

AGENDA

Meeting: Environment Select Committee

Place: Online

Date: Wednesday 14 July 2021

Time: 2.30 pm

[Online](#)

Please direct any enquiries on this Agenda to Stuart Figini, of Democratic Services, County Hall, Bythesea Road, Trowbridge, direct line 01225 718221 or email stuart.figini@wiltshire.gov.uk

Press enquiries to Communications on direct lines (01225) 713114/713115.

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Membership:

Cllr Paul Sample JP	Cllr Ian McLennan
Cllr Liz Alstrom	Cllr Dr Nick Murry
Cllr Tony Jackson	Cllr Bill Parks
Cllr Bob Jones MBE (Vice-Chair)	Cllr Rich Rogers
Cllr Jerry Kunkler (Chair)	Cllr Iain Wallis
Cllr Dr Brian Mathew	Cllr Mary Webb
Cllr Charles McGrath	

Substitutes:

Cllr Mark Connolly	Cllr Jon Hubbard
Cllr Brian Dalton	Cllr Stewart Palmen
Cllr Andrew Davis	Cllr Ricky Rogers
Cllr Matthew Dean	Cllr Tom Rounds
Cllr Nick Errington	Cllr Tony Trotman
Cllr Ross Henning	

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AGENDA

PART I

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

1 **Apologies**

To receive any apologies or substitutions for the meeting.

2 **Declarations of Interest**

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

3 **Chairman's Announcements**

To receive any announcements through the Chair.

4 **Public Participation**

[Guidance on how to participate in this meeting online](#)

Statements

Members of the public who wish to submit a statement in relation to an item on this agenda should submit this electronically to the officer named on this agenda no later than 5pm Monday 12 July 2021.

Questions

To receive any questions from members of the public or members of the Council received in accordance with the constitution.

Those wishing to ask questions are required to give notice of any such questions in writing to the officer named on the front of this agenda no later than 5pm on Wednesday 7 July 2021 in order to be guaranteed of a written response. In order to receive a verbal response questions must be submitted no later than 5pm on Friday 9 July 2021.

Please contact the officer named on the front of this agenda for further advice. Questions may be asked without notice if the Chairman decides that the matter is urgent.

Details of any questions received will be circulated to Committee members prior to the meeting and made available at the meeting and on the Council's website.

5 **Local Plan review (Pages 5 - 152)**

The Select Committee will receive the report, considered by Cabinet on 29 June 2021, which provides an initial summary of the main issues that were raised through the Local Plan consultation and the next steps.

The statements, questions and responses arising from the report going to

Cabinet are also provided.

6 Leisure facilities insourcing

The Select Committee to receive an update on the programme to bring all Wiltshire leisure centres under council control by 1 October 2021.

7 Forward Work Programme (Pages 153 - 154)

To note and receive updates on the progress of items on the forward work programme.

Under the revised Overview and Scrutiny (OS) arrangements there is now a single OS work programme controlled by the OS Management Committee, linked to priorities in the Business Plan.

Therefore it should be noted that, whilst any matters added by Members are welcome, they will be referred to the OS Management Committee for approval before formal inclusion in the work programme for the Environment Select Committee.

A copy of the Overview and Scrutiny Forward Work Programme for the Environment Select Committee is attached for reference.

8 Urgent Items

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

9 Date of Next Meeting

To confirm the date of the next scheduled meeting as 14 September 2021.

Wiltshire Council

Cabinet

29 June 2021

Subject: Wiltshire Local Plan Review Update

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

Key Decision: Key

Executive Summary

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

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

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

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

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

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

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

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

Proposal(s)

That Cabinet:

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

Reason for Proposal(s)

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

**Terence Herbert
Chief Executive**

Wiltshire Council

Cabinet

29 June 2021

Subject: Wiltshire Local Plan Review Update

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

Key Decision: Key

Purpose of Report

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

Relevance to the Council's Business Plan

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

Background

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

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

Main Considerations for the Council

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

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

Housing growth

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

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

Employment growth

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

Distribution of growth

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

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

Planning for the main settlements

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

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

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

Chippenham Housing Market Area

Calne:

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

Chippenham:

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

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

Corsham:

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

Devizes:

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

Malmesbury:

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

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

Melksham:

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

Salisbury Housing Market Area

Amesbury:

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

Salisbury:

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

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

Tidworth and Ludgershall:

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

Swindon Housing Market Area (within Wiltshire)

Marlborough:

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

Royal Wootton Bassett:

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

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

Trowbridge Housing Market Area

Bradford on Avon:

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

Trowbridge:

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

Warminster:

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

Westbury:

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

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

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

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

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

Rural settlements

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

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

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

Climate change

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

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

Overview and Scrutiny Engagement

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

Safeguarding Implications

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

Public Health Implications

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

Procurement Implications

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

Equalities Impact of the Proposal

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

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

Environmental and Climate Change Considerations

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

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

44. As summarised above, concerns about climate change and a desire for climate friendly planning policies have been articulated by consultees. Paragraph 36 sets out the work that will be carried out to develop the evidence relating to transport, renewable energy, zero carbon development policies and energy networks.

45. Sustainability Appraisal and Habitats Regulations Assessment also form an integral part of the plan making process. These help to ensure negative environmental impacts are avoided, and policies and proposals deliver development in a sustainable manner.

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

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

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

47. See above.

Financial Implications

48. Further evidence will be required to support development of the draft Plan (e.g. viability assessment, transport studies). The draft Plan will need to be progressed through subsequent stages of preparation including a further stage of consultation and examination before it can be adopted. While as far as possible the draft Plan will be developed using technical expertise of officers within the Council there is the need to procure support from external sources to ensure timely delivery.

49. Provision has been made for this in the 2021/22 Spatial Planning revenue budget and a recommendation has also been put forward to Cabinet as part of the Provisional Outturn 2020/21 report to create a Local Plan earmarked reserve. Future year budget requirements for 2022/23 and 2023/24 will need to be identified and included as part of the budget setting process.

Legal Implications

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

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

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

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

Workforce Implications

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

Options Considered

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

Conclusions

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

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Appendices

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

Appendix 2: Wiltshire's Housing Market Areas

Background Papers

None

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APPENDIX 1:

Initial summary of main issues raised through consultation on Wiltshire Local Plan Review

1. Introduction

1.1 Consultation to inform the Wiltshire Local Plan closed on 9 March 2021. Overall, in excess of 3,500 representations from 2,682 people and organisations were submitted on the consultation documents. A breakdown of the number of representations is provided in this report below against each consultation document. This summary outlines an initial analysis of the main issues that have emerged from the following consultation documents:

- Emerging spatial strategy
- Empowering rural communities
- Addressing climate change and biodiversity net environmental gain
- Planning for the Principal Settlements (Chippenham, Salisbury and Trowbridge)
- Planning for the Market Towns (12 in total)

1.2 A tabular format is used for each document and the consultation documents can be viewed via this [link](#).

2. Emerging Spatial Strategy (372 comments, 324 respondents)

2.1 The scale of housing was the dominant subject of comments. Most representations were from the 'general public and town or parish councils' and 'developers and agents'. This analysis therefore focuses on these sources as they tend to represent the extreme differences in views and breaks them down into the main areas commented on.

Amount of housing	
General public and Town and Parish Councils	<ul style="list-style-type: none">• The environmental impacts of this number of new homes are too great (both for lower and higher estimates of housing need for the plan period 2016 to 2036).• Infrastructure is insufficient to support it (both for lower and higher estimates of housing need).• Should not exceed the standard method requirement (a higher number will result in difficulties sustaining a five-year supply).• Job growth does not support a higher amount than the standard method calculation.• The amount of housing is being justified to deliver development at Chippenham.• Evidence underpinning housing numbers is out of date due to COVID and impact on economy (housing need is less than estimated).

Developer/agent	<ul style="list-style-type: none"> • A higher number than the standard method is supported; with many supporting the higher end of the range or above. • It should be higher: <ul style="list-style-type: none"> - To boost supply over the assessed need of the Wiltshire Core Strategy (44,000) - By a longer plan period (see below) - To deliver more affordable homes - To reflect recent high levels of delivery (Housing Delivery Test) - To both respond to and support economic recovery - To marry up with the maximum forecasts of five or ten-year migration trends in housing market areas where they differ
Climate change	
General public and Town and Parish Councils	<ul style="list-style-type: none"> • The strategy does not do enough to address climate change. • It represents business as usual - greenfield and car based. There should be carbon accounting and measurable targets set by the plan. • Lack of employment allocation at Melksham would exacerbate out-commuting and increase carbon footprint.
Developer/agent	<ul style="list-style-type: none"> • The strategy should focus growth on “sustainable settlements”, with general support for the main settlements. • Should extend “sustainable settlements” to include local service centres and large villages - both generally and certain settlements named e.g. those well related Swindon and Salisbury (see transport).
Transport	
General public and Town and Parish Councils	<ul style="list-style-type: none"> • Main settlements are already congested, and additional growth cannot be supported. • Greater emphasis upon accessibility by active modes of travel and brownfield development.
Developer/agent	<ul style="list-style-type: none"> • A focus on sustainable settlements can reduce the need to travel and support more sustainable modes. • Settlements near Salisbury (Laverstock and Wilton) and Swindon (Purton and Cricklade) are well located to support more environmentally friendly transport links.
Distribution of growth	
General public and Town and Parish Councils	<ul style="list-style-type: none"> • Too much emphasis upon greenfield sites and brownfield sites should be prioritised. • The COVID-19 pandemic will change behaviour and release land for new homes (e.g. in town centres). • The decline of town centres should be reversed. • Trowbridge Town Council considers that growth at Trowbridge should be dispersed around the town (village locations and Green Belt review).

	<ul style="list-style-type: none"> Concerns that inability to meet growth in Trowbridge Housing Market Area (HMA) will impact on locations in Melksham Community Areas in adjoining HMA.
Developer/agent	<ul style="list-style-type: none"> There is too great a focus on large sites at Chippenham, Trowbridge and (to a lesser degree) Melksham to be sure housing needs can be met in a timely way. (Consequently) higher scales of growth are necessary at other market towns. There is too much of a focus on main settlements when rural settlements can play a greater role than solely meeting local need. Opportunities to extend Swindon west have not been properly considered. There is too much emphasis upon brownfield land. Cotswold Business Park / Kemble Airfield promoted as new community for 2,000 homes (of which a significant part is in Cotswold District Council).
Economy	
General public and Town and Parish Councils	<ul style="list-style-type: none"> Growth should provide more employment to balance jobs and homes and reduce commuting. Becoming carbon neutral and changing behaviour as a result of the COVID-19 pandemic will affect employment needs.
Developer/agent	<ul style="list-style-type: none"> The economic evidence is out of date and needs to be revisited. Further evidence is needed on sectoral requirements. Junctions 16 and 17, M4 are promoted for strategic employment use.
Plan period	
Developer/agent	<ul style="list-style-type: none"> The end date of the plan should be altered so that it plans at least 15 years ahead at the time of adoption (2038 to 2040). The plan baseline should be brought up to date so that it plans positively for the future (2020 or 2021).
Neighbourhood planning	
General public and Town and Parish Councils	<ul style="list-style-type: none"> Confusion about neighbourhood plan requirements for towns, and the relationship between the Local Plan and neighbourhood plans. Confusion regarding purpose of brownfield targets and how these relate to the overall requirement for main settlements.
Developer/agent	<ul style="list-style-type: none"> The strategy should not rely on a large proportion of the homes needed being brought forward by neighbourhood planning. The relationship between neighbourhood plans and the Local Plan needs to be clarified.

3. Empowering Rural Communities (337 comments, 158 respondents)

3.1 Over half of the comments received were from the general public, with approximately 20% from landowners, developers or their agents and just under 20% from Parish and Town Councils. The main topic of interest was the proposed housing requirements for Local Service Centres and Large Villages. The summary of responses below has been arranged around the proposed changes to strategic planning policy for rural areas, as set out in the consultation document.

Suggestion for 40% affordable housing on sites of 5 or more dwellings

40% Target:

- Many were supportive, with some asking that it be a minimum and others that it should be higher. A 50% target was suggested for Areas of Outstanding Natural Beauty.
- Some felt that it should be less than 40%; with one suggesting baseline target of 20%, with parish and town councils given scope to set higher targets in neighbourhood plans.
- Some highlighted national guidance that allows different targets to be set for different types/locations of sites.
- Others noted that the 40% target will need to be viability tested before it can be justified.
- Some expressed concerns that 'wherever possible' encouraged negotiation of lower provision, whereas others called for greater flexibility to reflect actual need at point in time.
- It was also suggested that a 40% target would compromise quality and mean greater proportion of larger homes for house builders to meet profit expectations.

The 5 dwelling threshold:

- Concerns that a 5 dwelling threshold would encourage developers to breakup larger sites.
- A 5 dwelling threshold is inconsistent with national policy and presupposes that applications for Designated Rural Status would be successful.
- A 5 dwelling threshold would impact on site viability in rural areas.
- Lower threshold of 2 dwellings was suggested in AONBs.
- Some support; thresholds higher than 5 (such as 10) would mean reduced affordable homes in rural area.

Revised Core Policy 44 - community led housing in rural areas

- General agreement and support for the proposed policy. However, concerns also raised.
- Some considered maximum homes on sites should remain as 10; others suggested 20 homes on some sites would be unviable - increase to a maximum of 30 dwellings, being no larger than 5% of the existing village size.
- Housing needs assessments to cover both affordable and market housing.
- 'Community support', 'genuine local need', 'community led' and 'affordable' should be clearly defined

- Inclusion of Community Led Homes (CLH) is supported; should reflect that can be provided by groups other than Community Land Trusts e.g. co-operatives
- 25% market homes cross-subsidy not justified.
- Concerns that allowing cross-subsidy of up to 50% market homes on CLH sites is too high, although some also felt that it should apply to all schemes.
- Self-build homes can't be retained as affordable in perpetuity.
- An additional exceptions policy is needed to support both affordable and market custom/self-build housing.
- Appropriate housing density should be one of the policy criteria.
- Provision should be made for down-sizing/retirement homes.
- Doesn't reflect proper use of brownfield sites.

Restricting permitted development rights to prevent small homes in rural areas being increased in size or replaced by larger homes

- Views were mixed. Whilst some were broadly supportive, many others were against.
- Wrong to restrict/withdraw permitted development rights. People extend to accommodate growing families due to restricted supply of larger houses and because moving is unaffordable.
- Would be justified if best way of maintaining good mix essential for vitality of village.
- 'Small' needs to be defined.
- Rural areas are already at disadvantage (poorer transport, more expensive internet, lower speeds, etc). Removing rights compared to those in urban areas is inequitable.
- Extending homes encourages redevelopment of buildings in need of repair. The proposed approach would prevent this.
- National policy encourages need for mix of housing to support local needs and the vitality of rural communities.
- Approach appears at odds with national planning policy, which is clear that policies should be positive and support sustainable development in rural areas.
- National guidance confirms permitted development rights should only be removed in exceptional circumstances. Government is clear that people should be able to alter and extend their own homes, which has led to a significant expansion of permitted development rights reflective of this presumption to support homeowners.
- There is no evidence to justify the approach proposed. Permitted development rights are enshrined in law and a compelling case is needed to withdraw them.
- Should only be applied to new and existing affordable homes regardless of size.
- Need for restrictions should be informed by housing needs assessments; and an understanding of number of households wishing to downsize and composition of the existing housing stock.

Housing figures for Local Service Centres and Large Villages

Method for calculating housing requirements:

- Figures do not seem to be based on clear evidence. Detailed methodology with stage-by-stage results should be published.
- Method should include factors such as:
 - safety and capacity of the highway network
 - access to public transport

- school capacity
- shop/ post office provision
- access to health services
- employment opportunities
- Grade 1 and Grade 2 agricultural land
- availability of sites for development
- proximity to services and facilities in nearby settlements
- how development can contribute to vibrancy of village and support services and facilities

- Method should be simpler, based on percentage increase of the existing population.
- Overall housing requirements allocated to Large Villages and Local Service Centres for each of the HMAs is too high.
- Figure for some places is too high e.g. Shaw/Whitley and Atworth
- Growth should be directed to areas where it will serve to enhance the vitality of communities across the area to support both housing and economic growth.
- Methodology is prejudicial against smaller Large Villages (LVs), imposing disproportionate level of housing upon them – proposed housing requirements for many of the smallest Large Villages is greater proportionately than for some of the Local Service Centres.
- Commitments that match or exceed requirements imposes moratorium on further growth to 2036 at those settlements.

Policy for housing delivery and settlement status

- Local Plan should allocate sites at Local Service Centres and Large Villages and not wait for Neighbourhood Plans or until the site allocations plan is reviewed.
- Should be time limits for how long Neighbourhood Plans will be given to allocate housing sites to meet their requirements.
- High residual housing requirements leave villages wide open for speculative development.
- Housing requirements should be for designated neighbourhood areas rather than settlements.
- Position of settlements in hierarchy should be reviewed to consider changes since they were first identified.
- Winterslow, Redlynch and Morgan's Vale should be reclassified as Small Villages.
- Purton and Lyneham should be reclassified as Local Service Centres.
- Durrington's population is significantly higher than other Large Villages - should at least be a Local Service Centre. No justification for changing status of settlement from Market Town.
- Shaw and Whitley should not be treated as a single Large Village, housing requirement is disproportionate.

4. Addressing climate change and biodiversity net gain (163 comments, 158 respondents)

4.1 Comments generally fell into two groups. The first, those with environmental interests including general public and some parish councils who felt the Plan should be more aspirational in terms of achieving net zero carbon. The second, the more cautious development industry who pushed back questioning cost of building to zero carbon standards and the need for justification. Little evidence was provided through comments to help develop policy themes explored through the consultation. A summary of comments against the five policy themes is set out below.

Tackling flood risk and promoting sustainable water management
<ul style="list-style-type: none">• Flood risk from all sources should be reduced through an evidence-led assessment process.• Proposals for new development:<ul style="list-style-type: none">- must be safe from flood risk from all sources, including the cumulative effects of flood risk.- should incorporate multifunctional Sustainable Drainage Systems (wherever practicable) alongside natural flood management measures and nature-based solutions.- should include measures to significantly reduce water consumption (e.g. using a standard of 110ltr/day).• Policies must be set for protection of water resources (e.g. Source Protection Zones).
Enhancing green/blue infrastructure and biodiversity
<ul style="list-style-type: none">• Proposals for new development to be designed with sufficient, accessible and interconnected open spaces.• Trees form an integral element of design of new developments.• Strategy for protecting and enhancing green/blue infrastructure should be linked to expanding the network of active travel routes (wherever practicable).• Proposals for new development should deliver biodiversity net-gains through comprehensive enhancement of existing habitats.
Delivering sustainable design and construction methods in the built environment
<ul style="list-style-type: none">• Proposals for new development should utilise design features - such as choice of fabric, plot orientation, appropriate massing/density and natural features - to adapt to and wherever practicable mitigate for the effects of climate change.• All new residential and commercial developments should be built to zero carbon standards for energy efficiency.• Some felt that proposals for delivering zero carbon standard developments can be achieved with limited or no impact on scheme viability; but developers questioned the ability to do so.
Encouraging sustainable renewable energy generation and management

- Proposals for new development should have the ability to link to the national grid with limited or no impact on scheme viability.
- Proposals for new development should reduce energy demand and consumption.
- Opportunities for small-scale and large-scale renewable energy schemes should be encouraged and where necessary planned for through allocations of land.
- Wiltshire Council should lead by example in the installation and delivery of renewable energy from all practicable sources.
- Council's 'policy' of not supporting large-scale wind energy schemes should be reversed.
- Greater capture of wind and solar energy should be planned for, subject to the satisfactory mitigation of environmental impacts.
- Greater encouragement and support for the installation of community renewable energy schemes.

Promoting sustainable transport, active travel and improving air quality

- Opportunities for incorporating new Electric Vehicle (EV) charging points and hydrogen fuel refilling facilities should be fully explored and adopted.
- Proposals for new development should be in accessible locations to maximise opportunities for active travel.
- Opportunities for sustainable public transport schemes should be incorporated into major development schemes to encourage modal shift.
- All new development proposals should be adaptable and provide storage areas for bicycles and clothes drying facilities.
- Changes to working arrangements due to the pandemic should be factored into the design of new residential and commercial buildings.

5. Principal Settlements: Chippenham, Trowbridge and Salisbury

- 5.1 In response to the proposals for the three Principal Settlements there were significant representations relating to 'strategic matters' (e.g. the proposed scale, distribution and location of growth, lack of infrastructure, track record of delivery failure on large greenfield allocations, particularly at Trowbridge) and 'site specific' matters (e.g. traffic/congestion, environmental impact, loss of open space, disregard for the character of nearby villages).

Planning for Chippenham (473 comments, 375 respondents)

Summary

There were significant objections in response to the proposals, the scale of housing growth receiving the most comments, alongside objections to the preferred sites. Other specific issues raised by a significant number of respondents, include the need to prioritise brownfield over greenfield land, impacts on transport, landscape and biodiversity, and importance of green infrastructure and addressing climate change. Alternative greenfield sites were suggested including to the west of the A350 and an extension to Rawlings

Green allocation. Strategic employment allocations are promoted to the north and south of Junction 17, M4.	
Scale of Growth	
General public and Town and Parish Councils	<ul style="list-style-type: none"> • Significant objections to proposed level of growth - too high. Comments include how Chippenham is becoming too large and lacks infrastructure; housing numbers beyond Chippenham's needs. • Lead to out-commuting, increasing traffic and effect environment (air and noise pollution.) • Impacts on greenspace and cycleways. • Requests to prioritise redevelopment of brownfield land, higher brownfield land figure, reuse vacant buildings in the town centre and other empty buildings for residential use. • Requests for housing to be distributed to other towns and villages. • Climate change and loss of greenfield land is a concern; retain for farms and food production. • HIF bid pre-determined scale of growth. • Not enough evidence for housing figure.
Developer/agent	<ul style="list-style-type: none"> • Support for Chippenham as focus for growth. • Although questions about deliverability of high number of dwellings in plan period, as well as existing allocations. • Mixed support for brownfield target.
Other	<ul style="list-style-type: none"> • Prioritisation of brownfield land supported but must be designed sensitively to historic environment. • No robust case for level of growth. Not deliverable. • Excessive loss of countryside and resultant impact; contradicts climate emergency declaration. • Brownfield target implies loss of substantial employment land/space, undermining jobs and homes balance - increasing out commuting (carbon use) and congestion. • Support homes as positive for economic future of town
Place shaping Priorities	
General Public and Town and Parish Councils	<ul style="list-style-type: none"> • Consider impact of COVID-19 on the town centre and new uses for vacant buildings, including residential uses to strengthen centre; suggestion no need for new employment land. • Disagree that new road is required. • Should emphasise importance of River Avon, other green corridors and separation from surrounding villages (e.g. Tytherton Lucas, Stanley). Concerns about coalescence. • Priorities designed to support new sites, rather than lack of leisure and retail in Chippenham or adverse effects of development on Bremhill Parish.

	<ul style="list-style-type: none"> • Protect: Marden River similar to River Avon; North Rivers Cycle route as important corridor for walkers and cyclists. A road to the East of Chippenham will not ease congestion. Prefer the road to the south of Chippenham. • General support by Chippenham Town Council, as match Neighbourhood Plan Vision - minor amendments for priorities 1 (employment), 2 (town Centre) and 5 (Transport).
Developer/agent	<ul style="list-style-type: none"> • Developers comments on the place shaping priorities generally relate to their use in justifying preferred sites. • Owners of Borough Parade and Emery Gate Shopping Centres seeking to change existing shops to residential.
Others	<ul style="list-style-type: none"> • Priorities could reflect positive strategy for conservation and enjoyment of the historic environment. • Sport England suggests the creation of a healthy, inclusive sustainable town can be achieved through use of their 'Active Design' guidance. • Priorities are business as usual references to sustainable development, air quality and congestion, town centre investment. Won't create homes or jobs for local people. • Priority 5 is disingenuous due to focus on traffic congestion, which facilitates homes to south of Chippenham. • National Trust objects to southward expansion of Chippenham due to impacts on wider landscape setting of Lacock village and its historic assets.
Preferred Sites	
General public and Town and Parish Councils	<ul style="list-style-type: none"> • Significant objections to preferred sites. Some support for other options instead, particularly west of A350. • Significant objection to Future Chippenham and HIF proposals - done deal without consultation. • Retain farms and use for local food production. • Petition from 65 Hardens Mead residents seeking some fields to be designated as local greenspace (Site 1, East Chippenham). • Much of Site 1 (East Chippenham) is in Bremhill Parish and not supported by Bremhill Parish Neighbourhood Plan. • Town Council objects to preferred sites: <ul style="list-style-type: none"> - severe adverse impact on town, unacceptable damage to local environment - destruction high-quality farmland and wildlife habitat in Avon and Marden Valley. - New road including 2 river crossings and railway bridge not required without excessive housing numbers. - Sustainability Appraisal site criteria is biased; site selection methodology used to dismiss other options, which would not require costly carbon intensive infrastructure.

	<ul style="list-style-type: none"> - No brownfield or town centre sites included as options despite opportunity to improve town character and vibrancy. - Selected for commercial reasons (Wiltshire Council owned land), to coincide with road route and support business case for a new road.
Developer/agent	<ul style="list-style-type: none"> • Developers of land within preferred sites generally supportive; but raise objections on specific points, particularly place shaping priorities and concept plan layouts. • All developers seeking to maximise residential use on their land; less supportive of providing other uses e.g. employment, schools, renewable energy, greenspace. • More housing can be accommodated north of the North Rivers Cycle Route (New Leaze Farm); this has closer links with town centre than other parts of the site. • Promotion of some parts of sites as standalone developments. • Employment land locations would be better located nearer to A4 and/or A350; seeking advice from Local Enterprise Partnership. • Developers for other options consider their sites should be preferred as they do not involve major infrastructure and capable of early delivery - they challenge sustainability appraisal, site methodology including place shaping priorities. • Allocation of Langley Park as a brownfield site is promoted. • Promotion of additional land at existing Rawlings Green allocation to provide more housing and country park. • Promotion of extension to employment site south of M4 Junction 17 and new strategic allocation of land north M4 Junction 17 for employment.
Others	<ul style="list-style-type: none"> • Greater clarity needed on how impact on historic environment has informed spatial strategy and site selection considering legislation and national policy. • Some support that sites are the most appropriate. • Proposed economic development helps redress out-commuting and support town centre. • Lack of progress on Rawlings Green will impact on delivery of east Chippenham site. Alternative mix of sites based on lower quantum suggested that benefits from credible public transport. • Recommendation for the completion of hospital link road instead of the southern link road. • County farms should be used for local food. • Objections to all proposed sites. New economic evidence is needed to consider impact of COVID-19 and inform balance of jobs to homes - question need for employment land; retail and offices should be converted into homes. • Support for more homes north of cycle route due to accessibility to town centre and railway.

Concept Plans	
General Public and Town and Parish Councils	<p>Detailed comments from Chippenham Town Council:</p> <ul style="list-style-type: none"> • Detail of sites should be left to neighbourhood plan; albeit broad support for land uses. • Infrastructure, renewable energy, green buffer, local green spaces, walking and cycling routes, sustainable building construction and biodiversity net gain most important aspects. • Concerns about impact on villages. • Walking/cycling to link with existing network, urban area, town centre and transport modes. • More employment land to reduce car use. • More land for renewable energy. • Objects to built-up areas either side of cycle route, should be a green corridor as in emerging neighbourhood plan; housing to north contrary to Bremhill neighbourhood plan. • Uses for Hardens and New Lease Farms should be agricultural.
Others	<ul style="list-style-type: none"> • Consider Agricultural Land Classification for East Chippenham - site includes soil graded as best and most versatile. • Sewage treatment works in south Chippenham option may need to be expanded, as such residential development would need to be at appropriate distance. • Significant infrastructure, such as bridges, will cross the floodplain and the main river - development of infrastructure must not increase flood risk, and be delivering flood risk betterment for community and new development. • Opportunity to provide a longer length of River Park through the town and beyond should be looked at, including options to replace radial gate, for benefit of biodiversity, amenity and flood risk. • Proposals should demonstrate how responded to the historic environment including historic and landscape setting of the town, as well as historic assets. • Wilts and Berks Canal Trust considers that provision of canal should be integrated into site proposals and construction secured as green and blue corridor with walking/cycling routes. • Location is sought for an indoor community tennis facility at town.

Planning for Salisbury (357 comments, 289 respondents)

Summary

Significant concerns were expressed by the local community about effects of additional growth, both upon infrastructure and the city's historic landscape setting; and particularly the preferred site North of Downton Road between the city and Britford. Impact on ecology of the East Harnham Meadows SSSI being a key concern as well as coalescence. Fewer

<p>objections were expressed about the other two preferred sites, but concerns were raised about impact on historic environment. Considerable support was expressed for brownfield development first from the community with some wishing to see Churchfields brought forward for housing led development. Conversely, the development sector highlights that brownfield is uncertain and may not realise affordable housing that is needed. Alternative sites were promoted.</p>	
<p>General Public and City and Parish Councils</p>	<ul style="list-style-type: none"> • Redevelopment of brownfield land should be prioritised, re-use vacant buildings in the centre and elsewhere for residential use; ahead of greenfield/reduce greenfield loss. • Objections mainly to consequences of growth i.e. lagging infrastructure delivery, impact on highways, air-quality, landscape and biodiversity. • More active travel modes needed. • Concerns about loss of greenfield land. • General support for redevelopment of Churchfields for residential rather than retain in employment use, due to concerns about traffic (congestion, air quality) as alternative to greenfield. • Improvement of amenities and facilities needed at Old Sarum.
<p>Developer/agent</p>	<ul style="list-style-type: none"> • Comments that housing number for Salisbury should be higher, particularly given demand. • Brownfield development is uncertain and will not deliver. • Salisbury needs affordable housing, more easily realised through greenfield development.
<p>Place-shaping Priorities</p>	
<p>General public and City and Parish Councils</p>	<ul style="list-style-type: none"> • Concerns that priorities on landscape setting of city and separation with outlying villages (particularly Britford) not properly reflected in preferred sites selected. • Place shaping priority about Central Area Framework and visitor economy should be expanded to incorporate other sectors. • Priority for affordable housing should include explicit reference to key worker, young people and elderly. • Churchfields should be prioritised for redevelopment as Wiltshire Core Strategy to avoid HGVs through city cen • Support for redeveloping Churchfields and r • educing employment.
<p>Preferred sites</p>	
<p>General public and City and Parish Councils</p>	<ul style="list-style-type: none"> • Significant objections to preferred site North of Downton Road; concerns raised about coalescence of Salisbury with Britford, East Harnham Meadows SSSI, views to Cathedral, loss of landscape character and flooding.

	<ul style="list-style-type: none"> • Salisbury City consider site should be country park, particularly if North of Downton Road is allocated. • Britford parish suggest alternative site option should be considered in combination with preferred site North of Downton Road. • Reduce quantum of development proposed on preferred site North of Downton Road. • Relatively few objections to preferred site South of Downton Road. • Quidhampton Parish Council objects to Quidhampton Quarry (although not preferred site) becoming housing allocation. • Concerns about preferred site North East of Old Sarum due to impacts on landscape and Monarch's Way long distance path, and lack of facilities and amenities at Old Sarum.
Developer/agent	<ul style="list-style-type: none"> • Support from developers and landowners of preferred sites; promoter of preferred site South of Downton Road seeking its expansion to include Britford Park and Ride. • Developer associated with alternative option South of Harnham promoting its allocation. • New sites submitted and promoted adjacent to Beehive Park and Ride (Old Sarum), and south-west of Salisbury, adjacent to existing allocation on Netherhampton Road.
Others	<ul style="list-style-type: none"> • Objection by Natural England to preferred site North of Downton Road adjacent to East Harnham Meadows SSSI, due to potential impacts from recreation and air quality on the grasslands. • Significant concerns by Highway's England about access to Quidhampton Quarry, albeit recognise it is not a preferred site. • Environment Agency raised concerns about preferred site at Old Sarum, which is adjacent to a Source Protection Zone (vulnerable to pollution). • Historic England raised concerns about: how development of preferred site at Old Sarum could be accommodated in sensitive and historic landscape setting; and for preferred sites at Downton Road, whether heritage and landscape constraints have been appropriately taken into consideration (Woodbury Scheduled Ancient Monument and heritage assets at Britford). • National Trust is concerned about further north-wards expansion of Salisbury that would have adverse impacts on landscape setting of Figsbury Ring (scheduled ancient monument).
Concept Plans	
General public	<ul style="list-style-type: none"> • Significant objections to Site 6, North of Downton Road (reasons see above). • Some support for custom and self-build housing.

Developers and agents	<ul style="list-style-type: none"> • Concerns over inclusion of custom and self-build housing. • Developers of preferred sites at Old Sarum and North of Downton Road have presented different approaches.
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Planning for Trowbridge (397 comments, 360 respondents)

Summary	
<p>There was a significant level of objection to the scale of growth and preferred sites at Trowbridge. Traffic, specifically the volume and congestion that development would bring to that part of Trowbridge, Hilperton and Staverton receiving the most comments. Other specific issues raised, like Chippenham, include: the need to prioritise the redevelopment of brownfield sites first; the scale of growth (housing need), flood risk, infrastructure provision, biodiversity and landscape. Alternative sites were promoted through the consultation.</p>	
Scale of Growth	
General Public and Town and Parish Councils	<ul style="list-style-type: none"> • Mixed opinion. However, more objections than support for proposed level of growth (reasons below). • Post COVID-19 and Brexit impacts not yet known. • Town needs regeneration and lacks adequate infrastructure. • Some requests for housing to be distributed to other towns and villages; including at Southwick and North Bradley or a new settlement created. • Scale of preferred sites inappropriate for Hilperton and Staverton – Hilperton is a Large Village, scale of growth contrary to Wiltshire Core Strategy. • Preferred sites would exacerbate commuting on congested roads and increase flood risk. • Allocated employment land should be considered for homes. • Growth should not be artificially inflated to justify a secondary school - rationale for secondary school is not explained. • Prioritise redevelopment of brownfield land, including vacant buildings in town centre, and set higher brownfield figure. • Objections due to climate change and loss of greenfield land. • Long-established, naturally integrated green spaces between settlements must be safeguarded against inappropriate development for mental and physical well-being. • Integrity and identity of Semington village must be maintained and protected from over-expansion of Trowbridge.
Developer/agent	<ul style="list-style-type: none"> • General agreement with Trowbridge's Principal Settlement status as focus for growth and level of growth, some stated it wasn't high enough.

	<ul style="list-style-type: none"> • Other comments impact of COVID-19 not yet known - advocates more decentralised strategy to meet growth with more development to market towns and rural areas. • Support for strategic site to be allocated that transcends into next plan period. Site large enough to promote self-containment • Suggestion that Trowbridge could do more if other settlements more constrained. • Growth distribution strategy too weighted towards large scale complex sites adjacent to principal settlements and less reliance should be placed upon volume home builders to deliver a small number of complicated strategic sites (for which there is poor delivery track record in Wiltshire). • Smaller sites, separate from the main allocation, will enable choice for developers and provision of self-build plots. • Brownfield target too high. • Economic evidence out of date; plan should enable more employment generating development. • Greenbelt review required at town. • New housing sites promoted: Green Belt sites; employment allocation at Ashton Park; additional land adjacent to preferred options.
Others	<ul style="list-style-type: none"> • Historic England consider greater clarity needed on how level of growth and proposals have considered and responded to historic environment (landscape setting and heritage assets). • Prioritisation of brownfield land, including underused heritage buildings, is supported but must be designed sensitively to historic environment. • Reappraise employment and economic growth and take realistic approach to housing numbers for a town which is swamped with commuters.
Place shaping Priorities	
General Public and Town and Parish Councils	<ul style="list-style-type: none"> • Few comments from local councils, suggestion that vague and ineffective. • Some stated that the priorities are reasonable, but the strategy seems to bear little relationship to them. • Order of priorities should refocus on sustainability and climate change. • Impact of COVID-19 on town centre and new uses for vacant buildings (including residential uses), should be reflected. • Provision of services and amenities, such as health, play provision and the re-generation of the town centre should be prioritised. • Prioritise protecting village identities and importance of green infrastructure (including green belt and spaces), development should take place within town boundary not encroaching on villages.

	<ul style="list-style-type: none"> • Priorities are nearly all focused on the town, not enough about the villages and important greenspace around them. • Staverton should be one of the villages identified. Addressing traffic impact around the town and surrounding area should be prioritised e.g. Staverton bridge and Hilperton village despite Elizabeth Way.
Developer/agent	<ul style="list-style-type: none"> • Broad support for priorities. • Right priorities but don't appear to have necessarily informed preferred strategy for town. • Wording in priority (v) (bat mitigation) should be reviewed to ensure it has a 'place-shaping' focus and not one that limits development sites.
Others	<ul style="list-style-type: none"> • Historic England suggests the priorities could reflect positive strategy for conservation and enjoyment of the historic environment. • Sport England suggests the creation of a healthy, inclusive sustainable town can be achieved through use of their 'Active Design' guidance.
Preferred Sites	
General Public and Town and Parish Councils	<ul style="list-style-type: none"> • Considerable objections to all preferred sites. • Location for growth inappropriate - it does not share a contiguous boundary with the town; and goes beyond recently adopted settlement boundary. • Specific concerns about: <ul style="list-style-type: none"> - traffic generation and congestion in Trowbridge, Hilperton and Staverton, impact on road network including Staverton Bridge and walking and cycling; - exacerbation of flood risk; - lack of infrastructure, including health care and local services; - loss of farmland; - impact on biodiversity and landscape; - loss of market value of existing homes • Brownfield sites should be prioritised before greenfield - develop Bowyers site, East Wing, unused commercial land and premises etc • Capacity of preferred sites far exceeds any "local" needs. • Alternative sites/strategies suggested: Green Belt release (better locations to Trowbridge centre and station), dispersing growth to Southwick and North Bradley villages; adjacent to Green Lane Wood; Biss Farm employment allocation; either side A361 beyond rugby club; new settlement elsewhere (Hullavington, east of Devizes or west of Salisbury); locate neat new roads West Ashton, Melksham and Chippenham.

Developer/agent	<ul style="list-style-type: none"> • Support from land promoters within preferred sites, with feedback on proposals and objections on specific points on concept plan layouts. • Close collaborative working will be needed between Council and developer to ensure no viability challenges are created through development assumptions and policy requirements. • Developer's concern about extent of open space on their part of the allocation, preferring to see more housing. • Promoter of North East Trowbridge preferred site considers that land at Paxcroft Farm could be provided as 'Suitable Alternative Natural Greenspace' to provide recreation facilities to avoid harm to bats. • Questions raised about: site selection methodology and how Green Belt land has been dismissed; what is meant by a self-contained sustainable community; relationship of Staverton Road Bridge improvements to the preferred sites.
Others	<ul style="list-style-type: none"> • Natural England: Concerns raised, as preferred sites are in a medium risk area associated with important bat populations, ecological connectivity with the Kennet and Avon Canal important. Further assessment is needed and updating of Trowbridge Bat Mitigation Strategy to consider functionality of landscape including Hilperton Gap. • Local Plan must also consider potential designation of Trowbridge Woods as a SSSI. • Concerns raised by Wessex Water about scale of development, which is significant and requires major investment in networks and treatment. Clear guidance needed as to timescales and phasing to ensure strategies and investment can be in place. • Historic England suggests that greater clarity needed on how landscape setting of town and historic environment has informed site selection in accordance with national policy.
Concept Plans	
General Public and Town and Parish Councils	<ul style="list-style-type: none"> • Rather than providing comments about the concept plans, comments generally focused on in principle objections to the preferred sites being allocated (as set out above) - other comments relate to land being used for food production, open space for recreation. • Most disagree but conclude, if going to be built should: <ul style="list-style-type: none"> - Examine potential for district heating systems. Otherwise use solar energy on homes. Mixed views on wind power. - Consider water source heat pumps utilising the canal as a heat source.
Others	<ul style="list-style-type: none"> • Solar panels on roofs of all new buildings/ retrofitted on old buildings where possible.

	<ul style="list-style-type: none"> • New construction must meet highest standards of energy efficiency
Developer/agent	<ul style="list-style-type: none"> • Questions rationale for allocating green space on majority of site being promoted as part of preferred site, when series of smaller open spaces throughout the new allocation may be more appropriate. • Location of proposed uses are not agreed, and alternative plans are promoted. • Some support for masterplan and design code approach.

6. Market Towns

- 6.1 Generally each local community was concerned about the scales of growth being proposed. Many wished to see brownfield development prioritised and as much as possible delivered so that it is the only form of development. Communities expressed how much they valued the character and setting to their settlements and saw greenfield development as likely to be harmful in those respects.
- 6.2 Developers on the other hand most often considered that scale of growth at Market Towns should be higher. Many supported this view on the basis that too many homes were being focussed at the Principal Settlements, contrasting the large urban extensions proposed there with the opportunities they said they could provide to deliver housing sooner and more easily.
- 6.3 There was more consensus around place shaping priorities. These seemed to be broadly in tune with the views of each community. However, there were additional suggestions, alongside questioning of how priorities could be achieved.
- 6.4 The pool of sites suggested at each Market Town attracted a good proportion of comments from both the local community and others. These included comments from statutory agencies, like Natural England and Sport England, to sites that affected their interests, for example because of potential impacts on nearby Areas of Outstanding Natural Beauty or for potentially impeding the use of playing fields.
- 6.5 Historic England advises that the form and character of a town, within its wider landscape and historic setting, and the availability of suitable sites should inform the proposed scale of growth. To this end, it is suggested that the Council prepares a Heritage Topic Paper for each settlement and ensures that Conservation Area appraisals and management plans are kept up to date.
- 6.6 The Environment Agency highlight that Amesbury, Salisbury, Warminster, Devizes are within the River Hampshire Avon catchment which is currently failing protected area and Water Framework Directive objectives because of elevated phosphorus.
- 6.7 A summary of the main issues raised for each Market Town is set out below in alphabetic order.

Planning for Amesbury (18 comments, 18 respondents)	
Respondent Type	Main Issues Raised
Prescribed bodies including Town and Parish Councils	<p>Scale of Growth</p> <ul style="list-style-type: none"> • Town Council supports self-sufficient communities and balanced housing and employment growth. They are concerned the 350 additional homes suggested are top-down without adequate consideration of local factors. • Town Council support separating Amesbury from Bulford and Durrington, but clarification is needed on each settlement's future housing requirement. <p>Place Shaping Priorities</p> <ul style="list-style-type: none"> • Sport England supports the priority to improve recreational facilities and sports pitches in Amesbury. • Town Council agrees with all place shaping priorities but considers that self-sufficiency also requires enough infrastructure to balance development. <p>Pool of Sites</p> <ul style="list-style-type: none"> • MoD objects to Site 3 (south of Amesbury) due to the Aerodrome and Technical safeguarding zones associated with Boscombe Down. Natural England also highlights provisionally as Grade 3 Agricultural Land Classification (ALC) • Natural England objects to Site 2 (rear Countess services) – as it supports mixed area of both Deciduous Woodland and Lowland Fen registered as Priority Habitats. • Wessex Water prefers Sites 1 (north of Amesbury, south A303) and 3 (south of Amesbury) as seeming the most appropriate for connections to water services. Site 2, adjacent to sewage treatment works with a risk of reduced amenity due to fly and odour issues. • Town Council raises concerns for all three sites. Site 1 overlooks the A303; Site 2 is close to river and Site 3 is close to Boscombe Down. All three might result in adverse impacts on the World Heritage Site, and recreational pressures on the Salisbury Plain Special Protected Area (SPA). They suggest development of any sites would require contributes towards local infrastructure. • Highways England notes two sites are next to the A303 and there could be noise and air quality issues, which will need to be mitigated alongside any other impacts on the integrity of the asset. <p>Other</p> <ul style="list-style-type: none"> • Town Council suggests effects of the pandemic, move towards a Net Zero economy and increased working from home will change

	<p>the needs of the population and shape requirements for Amesbury.</p>
Developer/agent	<p>Scale of Growth</p> <ul style="list-style-type: none"> • Scale of growth should be increased because Amesbury not only serves residents of the town but also neighbouring areas. • Residual housing requirement should be increased from 350 dwellings to a minimum of approximately 1,500 dwellings for the period 2018-2040. <p>Place Shaping Priorities</p> <ul style="list-style-type: none"> • New proposed site at South West Amesbury could potentially deliver or facilitate several of the priorities by the provision of new in infrastructure. • Site 3 is large enough to accommodate a mixed-use development that includes new land for employment. <p>Pool of Sites</p> <ul style="list-style-type: none"> • New site proposed on land adjacent to High Post Business Park - 146.5 acres of land for employment use. • New site proposed on land west of A345 to the south of High Post (Fourmile Hill) - 355 acres of land for mixed use development. • New site proposed on land South West Amesbury as a development of approximately 1,200 new homes to include local village centre, community facilities, potential health hub, new primary school, green space and mobility hub.
General Public	<p>Scale of Growth</p> <ul style="list-style-type: none"> • Views on the scale of growth were mixed. Some saw Army Re-basing already filling the towns 'quota' of additional homes. <p>Place shaping priorities</p> <ul style="list-style-type: none"> • Priorities were generally acceptable. • Additional infrastructure was necessary to accompany any additional growth. Health services and education provision is particularly limited. • With few jobs there was little encouragement to live and work within the town. <p>Other</p> <ul style="list-style-type: none"> • The town needed to be served by more shops
Others	<p>Scale of Growth</p> <ul style="list-style-type: none"> • A local councillor suggests Amesbury has seen significant growth and that scale of development proposed would further constrain

	<p>already limited infrastructure. There are also limited brownfield sites.</p> <p>Place Shaping Priorities</p> <ul style="list-style-type: none"> • A local councillor supports the priorities but suggests the integration of Boscombe Down and Amesbury should be included. • Priorities supporting future development of Porton Down and Boscombe Down should be included. <p>Pool of Sites</p> <ul style="list-style-type: none"> • A local councillor advises that Site 1 floods, noise pollution would be problematic on Site 2 and Boscombe Down could have adverse impacts on Site 3. <p>Other</p> <ul style="list-style-type: none"> • Stagecoach support development on Land South West Amesbury, as it could underpin delivery of public transport infrastructure.
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Planning for Bradford on Avon (674 comments, 667 respondents)	
Respondent Type	Main Issues Raised
Prescribed bodies including Town and Parish Councils	<p>Scale of Growth</p> <ul style="list-style-type: none"> • Natural England advise that air quality impacts from growth should be assessed. • Town Council considers the scale of growth acceptable if it can be delivered on brownfield sites determined by neighbourhood planning. <p>Place Shaping Priorities</p> <ul style="list-style-type: none"> • Town Council suggests there should be more detailed reference to the need to address the climate emergency and biodiversity. • Town Council also considers there should be stronger recognition of heritage, landscape setting and infrastructure constraints affecting the town. • Town Council question's whether land should be provided for employment. <p>Pool of Sites</p> <ul style="list-style-type: none"> • Sport England objects to Site 3 (golf course) unless golf course is shown to be surplus and Natural England raise concerns about potential loss of green infrastructure. • Of three sites, Town Council suggested only a small part of Site 2 (land north of Holt Road) might have some potential for

	<p>development. Any sites should be identified by neighbourhood planning.</p>
Developer/agent	<p>Scale of Growth</p> <ul style="list-style-type: none"> • Scale of growth should be higher as the town has a range of services and facilities and a pronounced need for affordable homes. • A supply relying on small windfall sites cannot respond flexibly to changes in demand and will not deliver affordable homes. • Town does not have a good supply of previously developed land and the role of a brownfield target is unclear. <p>Place Shaping Priorities</p> <ul style="list-style-type: none"> • Proposed growth will not be enough to address the priority for affordable housing in the town • Employment and economy is stated as a priority but no provision suggested for additional land. <p>Pool of Sites</p> <ul style="list-style-type: none"> • Sites 2 (land north of Holt Road) and 3 (golf course) have been promoted for development confirming availability. • Site 1 (allotments) has not been formally promoted but it has been suggested that it can be developed in combination with site 2, with relocation of allotments to an area within site 2. • Alternatives or additions to the sites are promoted at the Football Ground, North of Poulton Lane, Land parcels off Bath Road, Leigh Road West and Trowbridge Road (to rear of Beehive). All except the football ground are Green Belt. <p>Other</p> <ul style="list-style-type: none"> • There should be a review of Green Belt boundaries and the neighbourhood plan should plan more positively to meet needs.
General Public	<p>Scale of Growth</p> <ul style="list-style-type: none"> • Scale of growth too high and would exceed the capacity of local infrastructure. It would create unacceptable environmental harm, including to local air quality. • Small minority supported a higher scale pointing to a local need for affordable homes. <p>Place Shaping Priorities</p> <ul style="list-style-type: none"> • No proposals for additional employment land provision undermine a priority to support the economy. • Strong support for pedestrian/cycle bridge across the River Avon. • Town should have a by-pass. • Green space and biodiversity should have greater recognition.

	<p>Pool of Sites</p> <ul style="list-style-type: none"> • Significant scale of objections to all three sites for a variety of reasons, particularly Site 3 (golf course). Sites 1 and 3 (allotments) are valued community spaces • Some indicated that site 2 would be preferred out of the three and a minority of others thought that the golf course would be preferable. • Sites were suggested adjacent to Beehive (Green Belt), the undergrounding of Station Car Park to free up land and land along Winsley Road (Green Belt). <p>Other</p> <ul style="list-style-type: none"> • Some suggested that homes could be provided by converting vacant retail. • Impact of COVID-19 and the future of the town centre were raised as concerns
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Planning for Calne	
Respondent Type	Main Issues Raised
Prescribed bodies including Town and Parish Councils	<p>Scale of Growth</p> <ul style="list-style-type: none"> • Town Council accepted suggested scale subject to concerns about employment and infrastructure being addressed. Employment land at Oxford Road and Spitfire Way should be safeguarded and employment provided as a priority. • Significant additional growth could potentially deliver an eastern bypass. <p>Place Shaping Priorities</p> <ul style="list-style-type: none"> • Town Council listed key priorities as: <ul style="list-style-type: none"> - Protect and provide sites for employment - early provision; - Provision of open space and allotment land; - Provision of land suitable for cemetery space; - Improvements to existing and new pedestrian and cycle routes; - A Town Centre levy; and - Provision of Primary School places and NHS services. • Calne Without Parish Council believes the priorities should be determined in the Neighbourhood Plan and include provision of infrastructure such as broadband in rural areas. <p>Pool of Sites</p> <ul style="list-style-type: none"> • Calne Without Parish Council consider it would be appropriate to examine the feasibility of developing sites that would bring together existing new development on the edge of town

	<ul style="list-style-type: none"> • Natural England raise concerns about the cumulative impacts that development of sites 2, 3 and 4 may have on the Area of Outstanding Natural Beauty • Wessex Water state that sites to the west of Calne have more potential spare capacity, although significant development to the east could lead to significant capacity improvements • Historic England note that several proposed sites adjoin or affect the setting of designated heritage assets. Their significance needs to be determined and applied to inform site suitability
Developer/agent	<p>Scale of Growth</p> <ul style="list-style-type: none"> • Calne is capable, and suitable for accommodating a higher level of growth to meet housing needs and to support economic growth. • Proposed level of growth should be higher to achieve transport solutions to alleviate air quality issues. • Calne is not significantly constrained in environmental terms. • Question whether brownfield sites are available for 60 dwellings and can be viably developed. <p>Place Shaping Priorities</p> <ul style="list-style-type: none"> • Meeting the range of housing needs, particularly for older people and affordable homes, should be recognised by a higher scale of growth. • It is stated in the settlement profile for Calne that significant additional growth could potentially deliver an eastern bypass - this should be included in the strategic priorities. <p>Pool of Sites</p> <ul style="list-style-type: none"> • General agreement that this is the right pool of sites for the Council to be considering at this time; but Council need to demonstrate they have considered all reasonable alternatives. • Given past delivery rates of new homes on brownfield land it is highly unlikely that Calne's housing needs can be met in full using brownfield land. • Three new sites were put forward for consideration through the site selection process.
General Public	<p>Scale of Growth</p> <ul style="list-style-type: none"> • There is a lack of infrastructure at Calne to cope with significantly higher growth. • Brownfield target should be much higher. • Any growth should lead to improvement in town centre services and amenities. • Significant number of comments supporting an eastern bypass between Sand Pit Rd and A4 at Quemerford. <p>Place Shaping Priorities</p> <ul style="list-style-type: none"> • Priorities are supported but question how they will be achieved.

	<ul style="list-style-type: none"> • Town centre regeneration urgently needed - town has a much larger population than the centre would suggest with a lack of shops, pubs and amenities. • GP, dental surgeries and more shops are needed. • Growth should seek transport solutions to alleviate town centre congestion and air quality concerns. • Local green spaces and biodiversity are highly valued by local people. <p>Pool of Sites</p> <ul style="list-style-type: none"> • Any development should make full use of all available brownfield sites before encroaching onto greenfield sites. • Sites around Calne received various objections and support depending on where people live. • Sites should be chosen that have good access to the transport network and employment. • Sites to be developed should be decided through the neighbourhood plan process. • Site 4 is very large and if developed should provide for an eastern bypass linking Sand Pit Road/Oxford Road with the A4 at Quemerford. <p>Other</p> <ul style="list-style-type: none"> • Desire to develop links with Bath University, Swindon colleges and other centres of learning to create opportunities for new environmental and economic business to revitalise Calne • Important that any development is aesthetically pleasing, allowing residents to integrate into the community, adding value to the town • Sustainability needs to be given much greater importance in all respects - site location, method of building, house insulation, heating systems, cycle routes, access to public transport etc.
Others	<p>Scale of Growth</p> <ul style="list-style-type: none"> • Scale of growth should be constrained until Neighbourhood Plan has completed an assessment of town centre brownfield sites in the light of pandemic.

Planning for Corsham (40 comments, 40 respondents)	
Respondent Type	Main Issues Raised
Prescribed bodies including Town and Parish Councils	<p>Scale of Growth</p> <ul style="list-style-type: none"> • Town Council considers levels of growth above those proposed would put undue pressure on local health services. <p>Place Shaping Priorities</p>

	<ul style="list-style-type: none"> • General support for the priorities with rewording suggested. <p>Pool of Sites</p> <ul style="list-style-type: none"> • Town Council support for sites 5 (The Circus), part of 3 (Land east of Lypiatt Road and west of B3353) and part of 4 (Land east of Leafield Trading Estate and west of Lypiatt Road). • They also outline opportunities to consider land excluded at Potely Rise and Copenacre. • Town Council object to further consideration of Sites 1 (Pickwick Paddock, Bath Road), 2 (Land South of Brook Drive), and 6 (Land to the North of 16 Bradford Road). • Natural England objects to Sites 5 (The Circus) and 6 (Land to the North of 16 Bradford Road) due to potential impacts on Bath and Bradford on Avon Bats Special Area of Conservation (SAC), Box Mine Site of Special Scientific Interest (SSSI), Corsham Railway Cutting SSSI and Cotswold Area of Outstanding Natural Beauty. • Potential for all sites to impact on Bath and Bradford on Avon Bats SAC. Detailed consideration of this is required during further assessment. <p>Other</p> <ul style="list-style-type: none"> • Need to protect the local mining industry. • Protection of the green buffer. • Local infrastructure improvements i.e. healthcare and roads.
Developer/agent	<p>Scale of Growth</p> <ul style="list-style-type: none"> • Support for additional growth at Corsham. • Opportunity to increase requirements at Corsham to ensure housing needs are met across Chippenham Housing Market Area. • Brownfield target should be avoided or clearly evidenced. • Plan period should be extended and the housing requirement for Corsham increased to reflect this. <p>Place Shaping Priorities</p> <ul style="list-style-type: none"> • Development to south of Corsham would help avoid coalescence with villages to the west and should be a priority. • A priority should be the enhancement of existing public transport. <p>Pool of Sites</p> <ul style="list-style-type: none"> • Brownfield sites should be included in the pool, including former RAF Rudloe Manor and other brownfield sites which fall outside of, but are well related to, main settlements. • General support provided for pool of sites as proposed. • All sites are actively promoted, except Site 5 (The Circus), which is not available for development at this time.

	<ul style="list-style-type: none"> • Three sites excluded at stage two are promoted.
General Public	<p>Scale of Growth</p> <ul style="list-style-type: none"> • Additional growth should be as minimal as possible and is potentially too high as proposed. • Any additional homes should be on brownfield sites. • Need for clarity relating to the brownfield target, which is higher than the residual number of homes to plan for. • Transport infrastructure improvements and local facilities, such as schools and healthcare need to accompany new development. <p>Place Shaping Priorities</p> <ul style="list-style-type: none"> • Priorities need updating to reflect impacts of the COVID-19 pandemic on shopping habits. The need for the provision of a second supermarket is questioned. • Need for improved social infrastructure, particularly local health services. • Addressing climate change, particularly renewable energy opportunities, need to be incorporated. • Local transport infrastructure improvements, particularly sustainable transport modes. <p>Pool of Sites</p> <ul style="list-style-type: none"> • Generally, the further consideration of any greenfield sites is argued. Brownfield sites within the town should be considered. • All sites are subject to objections, most pointedly Sites 3 (Land east of Lypiatt Road and west of B3353) and 4 (Land east of Leafield Trading Estate and west of Lypiatt Road). • Some support for Sites 1 (Pickwick Paddock, Bath Road) and 6 (Land to the north of 16 Bradford Road). <p>Other</p> <ul style="list-style-type: none"> • Joined up approach needed with carbon reduction targets.

Planning for Devizes (118 comments, 111 respondents)	
Respondent Type	Main Issues Raised
Prescribed bodies including Town and Parish Councils	<p>Scale of growth</p> <ul style="list-style-type: none"> • Devizes Town Council and Neighbourhood Planning Group (NPG) state that it is not sustainable to plan for more housing than is needed for the local population. Level of growth proposed would decrease self-containment and increase traffic at peak times. More consideration to be given to type of housing needed to suit the population profile.

	<ul style="list-style-type: none"> • Potterne Parish Council supports brownfield development close to the town centre to avoid further traffic congestion. <p>Place Shaping Priorities</p> <ul style="list-style-type: none"> • Devizes Town Council and NPG consider high priority should be given to the North Wessex Down Area of Outstanding Natural Beauty (AONB). More recognition is needed of the landscape setting of the town. • More reference to proposed 'Devizes Gateway Rail Station'; more focus on homes to meet local needs; and more detail on design. <p>Pool of Sites</p> <ul style="list-style-type: none"> • Natural England do not support: Site 1 (land adjoining Lay Wood) due to impact on AONB and restriction on movement of species in Lay Wood from wider landscape to east; Site 2 (land at Coate Bridge) due to impact on AONB. They consider Site 3 (land east of Windsor Drive) would need careful consideration due to AONB setting and nearby allotments as green infrastructure asset. • Historic England seek clarification that proposals have considered and responded to the historic environment - town's history, character and landscape setting surrounding heritage assets. • Devizes Town Council and NPG favours smaller sites in line with the neighbourhood plan, and brownfield sites (Devizes Wharf Regeneration project, hospital site and land linked to Green Lane treatment centre). • Devizes Town Council and NPG object to: <ul style="list-style-type: none"> - Site 1 (Land adjoining Lay Wood) due to impact on AONB setting and distance from the town centre (more than 20 minutes walking distance). - Site 2 (Land at Coate Bridge) due to impact on rural setting. - Site 4 (Broadway Farm) due to distance from town centre. - Site 6 (Greencare Nursery) due to proximity to woods. - Site 7 (Caen Hill Farm and Garden Trading Estate) due to access and impact on landscape setting. • Devizes Town Council and NPG suggest Sites 3 and 5 should be reduced and consider Site 8 suitable due to proximity to town centre.
Developer/agent	<p>Scale of Growth</p> <ul style="list-style-type: none"> • Support for the level of growth and calls for a higher housing requirement for Devizes. • Brownfield sites are difficult to deliver, a more balanced approach to housing delivery should be sought rather than brownfield first. • Further greenfield sites should be identified. • Brownfield target is based on historic windfall and there may not be enough deliverable sites.

	<p>Place Shaping Priorities</p> <ul style="list-style-type: none"> • There is general support for the place making priorities. <p>Pool of Sites</p> <ul style="list-style-type: none"> • Plan should not just focus on strategic and complex sites but identify moderate and small sized sites. • Brownfield sites have been promoted at: Wadworth Brewery site, Devizes School and two sites that will be surplus to NHS requirements - the old Devizes hospital site when the new Integrated Care Centre opens and Southgate House. • Some housing should be allowed on the Wiltshire Core Strategy Horton Road employment site allocation. • Sites 3 and 4 are being promoted together and can be combined with an adjoining site - land east of Windsor Drive. • Additional land is promoted: to increase Sites 5 and 8, and Site 2 with benefit of connection with the Canal; new land south of Marshall Road has been promoted; existing neighbourhood plan allocation at Hillworth Road is promoted together with an adjoining site.
General Public	<p>Scale of Growth</p> <ul style="list-style-type: none"> • Some responses called for development to occur on brownfield sites only. • Scale of growth generally considered to be too high or 'about right' • Those of objecting to high level were concerned about traffic and air quality issues; lack infrastructure including GP surgeries, dentists, roads and schools; loss of agricultural land; impact on wildlife; and landscape impact. <p>Place Shaping Priorities</p> <ul style="list-style-type: none"> • General support for place shaping priorities. • Further emphasis could be added on protection of natural environment, biodiversity and greater access to green spaces in the town. • Development should not exacerbate traffic problems in town • Consider access to potential Lydeaway train station. • Lack of infrastructure for new housing • Heritage value of town should be emphasised. • Greater recognition of Devizes Wharf regeneration, vitality of the town centre and good design. <p>Pool of Sites</p> <ul style="list-style-type: none"> • Many object to the Site 6 (Greenacres Nursery) due to existing use by community as greenspace as well as its importance for biodiversity, including bats. • Site 6 incorrectly classified as brownfield land.

	<ul style="list-style-type: none"> • Objections to all other Sites, particularly Site 2 (land at Coate Bridge) and Site 5 (land off the A342 and Sleight Road). • Underused retail and commercial units should be redeveloped for housing. • Empty properties should be tackled. • Windsor Drive is an effective outer boundary to the town.
Others	<p>Scale of Growth</p> <ul style="list-style-type: none"> • North Wessex Downs AONB consider growth to be okay, and support brownfield target due to landscape constraints at town. • Trust for Devizes consider growth to be about right but raise concerns about growth elsewhere and need to maintain housing land supply to avoid impact on Devizes. <p>Place Shaping Priorities</p> <ul style="list-style-type: none"> • Trust for Devizes consider: higher recognition of AONB and setting of the town is needed; vitality and viability of the town centre must be considered, particularly following COVID; the renewal of Devizes Wharf and restoration of Assize Court are crucial for the town. • The Devizes Assize Courts Trust call for specific heritage related place shaping priority to recognise heritage value in town as well as referencing the aims of the Devizes Wharf project and role that Assize Court play in that. • North Wessex Down AONB comment little weight has been given to the setting of the AONB. <p>Pool of Sites</p> <ul style="list-style-type: none"> • North Wessex Down AONB don't support Sites 1, 2 and 3 due to impact on landscape setting. • Canal and River Trust consider Sites 1 and 2 should contribute to enhancements to the canal towpath.

Planning for Malmesbury (61 comments, 61 respondents)	
Respondent Type	Main Issues Raised
Prescribed bodies including Town and Parish Councils	<p>Scale of Growth</p> <ul style="list-style-type: none"> • The Town Council (on behalf of the Joint Neighbourhood Plan Working Group (JNPWG)) consider the suggested scale of growth to be unsustainable because of the pressures on local infrastructure that would result; and there is no local need for more homes. <p>Place Shaping Priorities</p> <ul style="list-style-type: none"> • The Town Council (JNPWG) support recognition and support for the special irreplaceable characteristics of the town,

	<p>including landscape, heritage and ecology. Priorities should extend to climate change and encompass a town centre strategy</p> <p>Pool of Sites</p> <ul style="list-style-type: none"> • The Town Council (JNPWG) identify constraints and object to all the pool of sites. Additional greenfield sites are not needed and should not therefore be considered. • Natural England raise concerns about the impacts that development of Sites 4 and 5 to west of town may have on the Area of Outstanding Natural Beauty • Sport England object to the potential loss of the cricket club in Site 1. <p>Other</p> <ul style="list-style-type: none"> • Town Council (JPNWG) consider there should not be a target for housing on brownfield land. Opportunities are limited and it would lead to the loss of other uses important to the town to residential redevelopment. • Town Council (JPNWG) identify a range of other issues (such as traffic, education and sport and leisure that are referenced in the Neighbourhood Plan)
Developer/agent	<p>Scale of Growth</p> <ul style="list-style-type: none"> • The proposed level of planned growth is too low. • The town is a sustainable location for further growth to meet needs for affordable homes and help support local economic growth • There is insufficient justification for curtailing continued growth below past rates <p>Place Shaping Priorities</p> <ul style="list-style-type: none"> • A priority to meet the housing range needs, particularly affordable homes, should be recognised by a higher scale of growth • Economic growth prospects should be matched by allocating land for business development <p>Pool of Sites</p> <ul style="list-style-type: none"> • Sites 1, 4 and 5 were supported by developers, landowners or their agents. • Five other parcels of land were suggested as fresh opportunities or land that should not have been rejected
General Public	<p>Scale of Growth</p> <ul style="list-style-type: none"> • The proposed level of planned growth is too high. The character and attractiveness of the settlement will be harmed, including access to limited and diminishing green space

	<ul style="list-style-type: none"> • There is insufficient infrastructure to support further significant development. • Levels of growth should respect proposals in the neighbourhood plan. <p>Place Shaping Priorities</p> <ul style="list-style-type: none"> • There should be greater recognition of the distinctiveness of the town, preserving its historic character and setting. • The town centre has an important role and character that should be protected and supported. • There should be a greater reference to meeting the needs of the young • Priorities should recognise needs for local sports and leisure provision <p>Pool of Sites</p> <ul style="list-style-type: none"> • The scope for development shown by a pool of sites does not correspond to the scale of growth proposed. • The only sites that should be developed are those in the neighbourhood plan or brownfield sites • Site 1 had the most objections largely because of its size, the threat to the cricket club and the impact development would have on the town's surroundings <p>Other</p> <ul style="list-style-type: none"> • There should be a greater emphasis upon tackling climate change. • The character of the town was already under threat from development that would harm it.
Others	<p>Pool of Sites</p> <ul style="list-style-type: none"> • The Malmesbury River Valleys Trust highlights the role of site 1 in mitigating flood risks and as a site of biodiversity value.

Planning for Marlborough (52 comments, 48 respondents)	
Respondent Type	Main Issues Raised
Prescribed bodies including Town and Parish Councils	<p>Scale of Growth</p> <ul style="list-style-type: none"> • Preshute Parish Council voiced objection to levels of housing and employment land that had not directly been tested, believing it unsustainable. Justification base on need for affordable housing is not fully evidenced. • Marlborough Area Neighbourhood Plan Steering Group (MANPSG) and Marlborough Town Council called for more detailed assessment of capacity for brownfield land to provide new homes.

	<p>Place Shaping Priorities</p> <ul style="list-style-type: none"> • The MANPSG and Marlborough Town Council generally support for priorities but wished to see the findings of their work on these to be given consideration. <p>Pool of Sites</p> <ul style="list-style-type: none"> • Natural England is concerned by Site 1's proximity to River Kennet SSSI and does not support Site 2 due to proximity of priority habitat. They raise the importance Savernake Forest SSSI and disused railway tunnel for species (bats). • The Environment Agency comments that the effect of climate change on the fluvial flood levels from the river may affect lower areas on Site 1; and as Site 2 lies almost entirely within Source a Protection Zone for Marlborough public water supply borehole it is not taken forward. • Sport England raised concern over Site 3 due to its proximity to playing fields, outlining no land should be developed on or impacting sports facilities. • Preshute Parish Council raised concerns about landscape character and impact on the AONB. • The MANPG and Marlborough Town Council referred to site selection work they undertook to allocate sites within their neighbourhood plan and highlighted that some sites appearing in the Site Selection Report had been identified as unviable. <p>Other</p> <ul style="list-style-type: none"> • The MANPSG and Marlborough Town Council outlined concerns regarding the impact of growth on education capacity, highway network and traffic congestion. • The MANPSG and Marlborough Town Council outlined a need to provide sports and leisure facilities.
Developer/agent	<p>Scale of Growth</p> <ul style="list-style-type: none"> • The scale of growth was broadly supported noting the need to provide more affordable homes. • The Council should undertake a more detailed assessment of capacity for brownfield land to provide new homes. <p>Place Shaping Priorities</p> <ul style="list-style-type: none"> • Broad agreement that affordable housing needs are met as part of a mixed and balanced community. <p>Pool of Sites</p> <ul style="list-style-type: none"> • The withdrawal of Preshute from the Marlborough Area Neighbourhood Plan means some sites cannot be considered by the that Plan that may be preferable. This should not influence the Local Plan Review.

	<ul style="list-style-type: none"> • Sites 3 and 4 can deliver a healthcare facility and primary school land.
General Public	<p>Scale of Growth</p> <ul style="list-style-type: none"> • There were concerns about the scale of growth being justified by a need of affordable housing that is not fully evidenced. • There was concern that additional housing was not being matched by equivalent new employment. • Growth should not put undue pressure on local infrastructure. In particular there were concerns about the effects of traffic, including HGVs and concerns about air quality. <p>Place Shaping Priorities</p> <ul style="list-style-type: none"> • Many were concerned about protecting the towns assets and character, in particular landscape value and biodiversity of natural space. • The impacts of the COVID-19 pandemic need consideration in relation to changing travel patterns and need for employment land. • Town centre should be enhanced. • Affordable housing should be genuinely affordable. <p>Other</p> <ul style="list-style-type: none"> • There were contrasting views on the role of the Neighbourhood Plan. One view was that neighbourhood planning should allocate sites for development. A different view was that the Local Plan should lead the planning process.
Others	<p>Scale of Growth</p> <ul style="list-style-type: none"> • North Wessex Downs AONB support the need for new development but advise this should be prioritised on brownfield land. <p>Place Shaping Priorities</p> <ul style="list-style-type: none"> • North Wessex Downs AONB broadly support the place shaping priorities, offering refinements. • Higher priority should be given to environmental considerations and net zero by 2030. <p>Pool of Sites</p> <ul style="list-style-type: none"> • North Wessex Downs AONB did not support the pool of potential development sites due to landscape sensitivities and ecological habitats. Consideration should be given to dark skies.

Planning for Melksham (102 comments, 95 respondents)

Respondent Type	Main Issues Raised
<p>Prescribed bodies including Town and Parish Councils</p>	<p>Scale of Growth</p> <ul style="list-style-type: none"> • Joint response of Melksham Without Parish Council (MWPC), Melksham Town Council (MTC) and Melksham Neighbourhood Plan Steering Group (MNPSG) - consider there has been a disproportionate uplift to Chippenham HMA and thus Melksham specifically. • MWPC/MTC/MNPSG wish to see additional employment land allocated at Melksham • MWPC/MTC/MNPSG strongly supportive of development of brownfield land being prioritised • Wessex Water consider development proposed at Melksham is significant and appraisal will be required to consider solutions and how best to direct investment for growth. <p>Place Shaping Priorities</p> <ul style="list-style-type: none"> • MWPC/MTC/MNPSG generally supportive of priorities but suggest some amendments. • MWPC/MTC/MNPSG - Melksham and Bowerhill have reached a point where much of its existing market town infrastructure is at or over capacity. Growth must be linked to delivery of infrastructure (schools, healthcare and community facilities) and investment in the town centre. • MWPC/MTC/MNPSG supportive of A350 bypass but consider larger scale planned growth should be delivered with and not before its delivery. <p>Pool of Sites</p> <ul style="list-style-type: none"> • MWPC/MTC/MNPSG consider that Sites 1, 9, 10, 11, 13, 17 are most suitable for development and suggest an alternative site (Cooper Tires brownfield site) is also suitable. • Historic England note several sites adjoin or affect the setting of designated heritage assets. Their significance needs to be determined and applied to inform site suitability. • Semington Parish Council is seeking a 500m no development zone to the north of the Kennet and Avon canal if Sites 5, 6 or 7 are allocated for development. • Sport England is concerned that Site 1 would prevent Melksham football and rugby club from expanding its facilities and that careful masterplanning will be required <p>Other</p> <ul style="list-style-type: none"> • Canal & River Trust request early engagement if bypass route to cross River Avon • Environment Agency highlight need for detailed flood risk assessment for the Melksham link project that will connect with

	<p>the River Avon; and potential for integrated approach to navigation and flood risk.</p>
<p>Developer/agent</p>	<p>Scale of Growth</p> <ul style="list-style-type: none"> • Most consider level of growth is appropriate, but some think it is too low. • Town is a sustainable location for further growth to meet needs for affordable homes and support local economic growth • Seek review of decision not to allocate employment land at Melksham. • General support for brownfield site development but this should not impact on the overall phasing and delivery of other sites that will be required. <p>Place Shaping Priorities</p> <ul style="list-style-type: none"> • General support for the priorities. • Support the proposed A350 bypass as it is needed as a strategic corridor. • Education, health care and transport improvements are rightly key infrastructure priorities that need to be addressed by new developments. <p>Pool of Sites</p> <ul style="list-style-type: none"> • General support for the pool of sites proposed. • Acknowledgment that several large sites may be needed to meet housing requirement. • Three new sites were promoted for development (land at Verbena Court/Eastern Way, land north and west of Manor Farm and land between Eastern Way and Site 1).
<p>General Public</p>	<p>Scale of Growth</p> <ul style="list-style-type: none"> • Proposed level of growth is far too high for a town the size of Melksham. • Melksham should retain its rural market town feel. • There should be a more equal distribution of new housing to other settlements in the HMA. • Brownfield target is not ambitious enough. • This high level of growth will add to coalescence with the villages of Bowerhill and Berryfield. • There is insufficient infrastructure to support further significant development, especially schools, GP surgeries and dentists. • Significant growth should not come forward before a bypass is in place as it will only add to A350 traffic congestion. <p>Place Shaping Priorities</p> <ul style="list-style-type: none"> • General support for the priorities.

	<ul style="list-style-type: none"> • Natural environment along the River Avon corridor should be protected. • New development must support regeneration of the town centre. • Widespread support for Wilts & Berks Canal restoration. • Kennet and Avon Canal must retain its rural character. • The town needs more GP and dental surgeries and a new secondary school. • There is generally a mixed response to the need for an A350 bypass - some believe it is urgently needed, some believe it is not a priority. <p>Pool of Sites</p> <ul style="list-style-type: none"> • There should be a policy of developing brownfield sites first and a higher brownfield target. • The only sites that should be developed are brownfield sites and those allocated through the neighbourhood plan process. • A priority should be the redevelopment of the Cooper Tires site which could aid town centre regeneration. <p>Other</p> <ul style="list-style-type: none"> • There should be a greater emphasis on tackling climate change and enhancing biodiversity. • An eastern bypass will have significant landscape and biodiversity impacts. • Infrastructure, especially schools, transport and healthcare must come first before any new housing.
Others	<p>Scale of Growth</p> <ul style="list-style-type: none"> • Stagecoach consider that Melksham has potential to support growth on a strategic scale and they see scope to develop the level of public transport provision substantially • National Trust is concerned that development to the north and east of Melksham will add to rat-running issues through Lacock. <p>Place Shaping Priorities</p> <ul style="list-style-type: none"> • Strong support for the safeguarding of route for the canal and restoration by Wilts and Berks Canal Trust.

Planning for Royal Wotton Bassett (59 comments, 57 respondents)	
Respondent Type	Main Issues Raised
Prescribed bodies including Town and Parish Councils	Scale of Growth

	<ul style="list-style-type: none"> • Royal Wootton Bassett Town Council is only supportive of the proposed level of growth if it can be assured that the infrastructure improvements to support it can be delivered. • Wessex Water state that significant improvements are likely to be required to support this scale of growth. • Highways England notes a potentially significant level of development and obstacles to overcome if growth is to be successfully delivered (traffic at Junction 16 and within the town), further information is sought on mitigation. <p>Place Shaping Priorities</p> <ul style="list-style-type: none"> • The Town Council would like to see four additional priorities to reflect those that have emerged from public consultation on the neighbourhood plan review. <p>Pool of Sites</p> <ul style="list-style-type: none"> • Natural England is concerned that Site 7 contains Wootton Bassett Mud Springs SSSI designated for its fluvial geomorphology. • Sport England is concerned that development at Sites 1 and 3 (north of town) could impede the use of adjacent playing fields • Royal Wootton Bassett Town Council do not support: Sites 1 and 2 (north of town), 4 (land at Whitehill Lane) ,7 (south of town) and 8 (land at Woodshaw), but in principle would support Sites 3 (land at Maple Drive), 5 and 6 (south of the town). <p>Other</p> <ul style="list-style-type: none"> • The Town Council do not support the brownfield target, as it is not in accordance with national policy, which requires neighbourhood areas to be given a 'housing requirement' figure. Also, target is based on historic windfall delivery and may not be possible to allocate sufficient sites.
Developer/agent	<p>Scale of Growth</p> <ul style="list-style-type: none"> • Scale of growth was generally supported, but it was suggested that higher scales could help meet needs for infrastructure (e.g. health and education). Growth scales reflected the town's relationship with Swindon. • The Neighbourhood Plan could be a platform to bring forward small scale brownfield land to complement Local Plan allocations. <p>Place Shaping Priorities</p> <ul style="list-style-type: none"> • Generally considered to be the right priorities. <p>Pool of Sites</p> <ul style="list-style-type: none"> • Sites 1, 3,4,5,6,7 and 8 have all been promoted, Site 2 was not.

	<p>Other</p> <ul style="list-style-type: none"> • Questionable whether brownfield sites are actually available and can be viably developed.
General Public	<p>Scale of Growth</p> <ul style="list-style-type: none"> • Growth should be lower and the need for additional employment land was questioned <p>Place Shaping Priorities</p> <ul style="list-style-type: none"> • Priorities 1 (protecting the distinct character and identity of the town, recognising its proximity to Swindon), 9 (conserving and enhancing environmental assets around Royal Wootton Bassett) and 10 (maintaining the town's elevated historical setting and central conservation area) are considered the most important. • There needs to be a bypass to deal with the town's traffic problems. • Investment in school and GP provision is needed <p>Pool of Sites</p> <ul style="list-style-type: none"> • Sites to the west of the town should be avoided to preserve the historic character of the town. Concerns raised about harm to landscape in relation to the Royal Wootton Bassett escarpment and Dauntsy Vale. • Significant objections to Site 4 (land at Whitehill Lane). These included references to flooding, traffic problems and loss of biodiversity. • Sites 5,6,7 and 8 should be avoided as they are on the floodplain. • Site 8 could cause coalescence with Swindon.
Others	<p>Scale of Growth</p> <ul style="list-style-type: none"> • Stagecoach consider quantum for the Swindon housing market area is suppressed, and as such fails to recognise role that Royal Wootton Bassett can play to meet the five delivery principles set out in the Emerging Spatial Strategy document. Higher growth can help support public transport infrastructure. <p>Place Shaping Priorities</p> <ul style="list-style-type: none"> • Wilts and Berk Canal Trust supports the safeguarding of a route and restoration of the canal as a priority.

Planning for Tidworth and Ludgershall (14 comments, 14 respondents)

Respondent Type	Main Issues Raised
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<p>Prescribed bodies including Town and Parish Councils</p>	<p>Scale of Growth</p> <ul style="list-style-type: none"> • Both Tidworth and Ludgershall Town Councils agree with the scale of growth, but do not support higher levels of housing. • They also support prioritisation of delivering employment at Castledown Business Park ahead of allocating additional employment land; and support limited retail and leisure uses on the site. <p>Place Shaping Priorities</p> <ul style="list-style-type: none"> • Town Councils provide general support for priorities and some rewording. • Ludgershall Town Council propose the incorporation of priority to address climate change, through 'greener' housing. • Environment Agency asks that the need to avoid impacts on River Avon SAC from new development are incorporated. <p>Pool of Sites</p> <ul style="list-style-type: none"> • Both Town Councils provide support for Sites 1 (Land East of Crawlboys Road), 4 (Land at Empress Way), 5 (south-west Ludgershall), 6 (Land North of Wellington Academy) and 7 (Land North of A3026). • Tidworth Town Council is concerned over sites around Tidworth. • Ludgershall Town Council believe Sites are good representation of land availability. • Wessex Water outline water supply requirements as a key consideration for this area, as it is subject to three separate undertakers. • Natural England outline landscape concerns relating to Sites 1 (Land East of Crawlboys Road), 4 (Land at Empress Way) and 5 (south-west Ludgershall). • Objections relating to the potential scale of residential development at Site 4 (Land at Empress Way). • Sport England raised concerns relating to Sites 5 (south-west Ludgershall) and 6 (Land North of Wellington Academy), which are adjacent to playing fields.
<p>Developer/agent</p>	<p>Scale of Growth</p> <ul style="list-style-type: none"> • Level of growth proposed is not justified and should take account of the extent of the functional relationship with Andover. • Increasing housing development will support the delivery of Castledown Business Park. The delivery of which should be prioritised ahead of making additional allocations. <p>Place Shaping Priorities</p> <ul style="list-style-type: none"> • Meeting 'local needs' does not reflect the area's strategic role.

	<ul style="list-style-type: none"> • Priorities iv and vi require the delivery of Site 4 (Land at Empress Way). <p>Pool of Sites</p> <ul style="list-style-type: none"> • Sites 5 (south-west Ludgershall), 6 (Land North of Wellington Academy), 7 (Land North of A3026), 8 (Land West of Pennings Road), 9 (North-west Tidworth), 10 (Land South of Bulford Road) and 11 (Land South of The Mall) are unavailable at this time. • Site 4 (Land at Empress Way) is actively promoted.
General Public	<p>Scale of Growth</p> <ul style="list-style-type: none"> • The proposed scale of growth is supported. • Additional employment could help overcome Ludgershall's dormitory role. • Castledown Business Park should be able to meet short term employment needs. <p>Place Shaping Priorities</p> <ul style="list-style-type: none"> • General support for the priorities as written. <p>Pool of Sites</p> <ul style="list-style-type: none"> • Some support for the proposed pool of sites. • Concern that the continuation of Empress Way linking to the A342 to the east would be needed ahead of additional housing development at Site 4 (Land at Empress Way) <p>Other</p> <ul style="list-style-type: none"> • Transport improvements are required to address local transport issues, including road, cycle and pedestrian improvements. • Timing of delivery of a road linking Empress Way to the east of Ludgershall is a key concern.
Others	<p>Scale of Growth</p> <ul style="list-style-type: none"> • The current or a lower quantum of housing development is accepted. • A joint neighbourhood plan could be the appropriate vehicle for delivering brownfield sites and affordable housing. • Prioritisation of the delivery of Castledown Business Park ahead of additional employment allocations. • Support for start-ups/small businesses at Castledown Business Park. <p>Place Shaping Priorities</p> <ul style="list-style-type: none"> • Support for the continuation of Empress Way, increased recreation and leisure facilities for younger people and housing to meet locally identified needs.

	<p>Pool of Sites</p> <ul style="list-style-type: none"> • There was strong support for Sites 5 (south-west Ludgershall) and 7 (Land North of A3026). • Salisbury Reds object to the further consideration of Sites 1 (Land East of Crawlboys Road), 2 (Land North of A342), 3 (Land North-East of A342) and 6 (Land North of Wellington Academy) due to distance from the existing bus network. • Public and private rights of way, which cross the railway line will require detailed consideration during further assessments. <p>Other</p> <ul style="list-style-type: none"> • Road improvements are required to address local transport issues, including road, cycle and pedestrian improvements. • Timing of delivery of a road linking Empress Way to the east of Ludgershall is a key concern.
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Planning for Warminster (25 comments, 24 respondents)	
Respondent Type	Main Issues Raised
Prescribed bodies including Town and Parish Councils	<p>Scale of Growth</p> <ul style="list-style-type: none"> • Chapmanslade Parish Council support the identification of opportunities for housing on brownfield sites. <p>Place Shaping Priorities</p> <ul style="list-style-type: none"> • Chapmanslade Parish Council outline a need to emphasise active travel. <p>Pool of Sites</p> <ul style="list-style-type: none"> • Natural England indicate that landscape and biodiversity are a concern for Site 9 (Land at New Farm). • Environmental Agency states that pollution prevention in relation to River Avon Special Area of Conservation (SAC) is a concern for Site 9 (Land at New Farm). • Environment Agency states risk of contamination of Warminster Malting Public Water Supply boreholes for Sites 5 (Land at Church Street), 6 (Land Adjacent 89 Bath Road), 7 (44 and 48 Bath Road) and 8 (Land at Brick Hill) and also, that sites are within areas where water resources and pollution prevention are a key consideration. • Highways England outline that due to proximity to A36, noise and air quality issues are concerns for Sites 4 (Warminster Common) and 8 (Land at Brick Hill). • Historic England have heritage concerns relating to Site 2 (East Warminster/East of the Dene).

	<ul style="list-style-type: none"> • Sport England objects to Sites 1 (North Warminster/Elm Hill) and 2 (East Warminster/East of the Dene) due to loss of playing fields.
Developer/agent	<p>Scale of Growth</p> <ul style="list-style-type: none"> • Risks identified related to a reliance on the delivery of the West Warminster Urban Extension - small/medium sites needed to diversify supply. • Interim Sustainability Appraisal suggests that there is capacity for additional/higher levels of growth. • Reliance on housing delivery through neighbourhood plans should be avoided. • Asks for detailed consideration of cross boundary housing needs and suggests unmet housing needs from Mendip District should be provided for. <p>Place Shaping Priorities</p> <ul style="list-style-type: none"> • A priority is needed to encourage the delivery of green space alongside new homes. • Support for incorporation of a priority for the use of sustainable materials and construction. <p>Pool of Sites</p> <ul style="list-style-type: none"> • Opportunity to maximise development at the West Warminster Urban Extension should be taken. • Opportunity on land excluded north of Grovelands Way, which is subject to planning permission for specialist housing for older people. • Sites 2 (East Warminster/East of the Dene), 5 (Land at Church Street), 8 (Land at Brick Hill) and 9 (Land at New Farm) have been actively promoted. Site 3 (Land adjacent to Fanshaw Way) is also being promoted, but as part of a larger site area. • Site 1 (North Warminster/Elm Hill) is not currently available for development.
General Public	<p>Scale of Growth</p> <ul style="list-style-type: none"> • The proposed scale of growth is accepted and should not increase. • Growth should be directed towards brownfield sites. <p>Place Shaping Priorities</p> <ul style="list-style-type: none"> • Priorities should support redevelopment in the town centre. • Priorities should include: need for GP surgery expansion; tree planting on new developments; flood risk; and the need to protect green space. <p>Pool of Sites</p>

	<ul style="list-style-type: none"> • Redevelopment of brownfield sites should be prioritised ahead of allocating additional greenfield land. • Objections raised to the further consideration of Sites 1 (North Warminster/Elm Hill), 5 (Land at Church Street) and 9 (Land at New Farm). • Support for further consideration of Sites 4 (Warminster Common) and 8 (Land at Brick Hill).
Others	<p>Scale of Growth</p> <ul style="list-style-type: none"> • Development in addition to that committed should be directed towards brownfield land/vacant land and buildings. <p>Place Shaping Priorities</p> <ul style="list-style-type: none"> • Priorities should support redevelopment in the town centre and other mixed-use development that could address the town's dormitory role. • Pedestrian, cycle and bus access should be a priority for all new developments to increase access between the town centre and edge of town developments. <p>Pool of Sites</p> <ul style="list-style-type: none"> • The Woodland Trust outline that Site 8 (Land at Brick Hill) is near Norridge Wood Ancient Woodland, which should be considered during further assessment. • Allocation of additional greenfield sites should be avoided. Brownfield sites or the increase in allocation at the West Warminster Urban Extension should be prioritised.

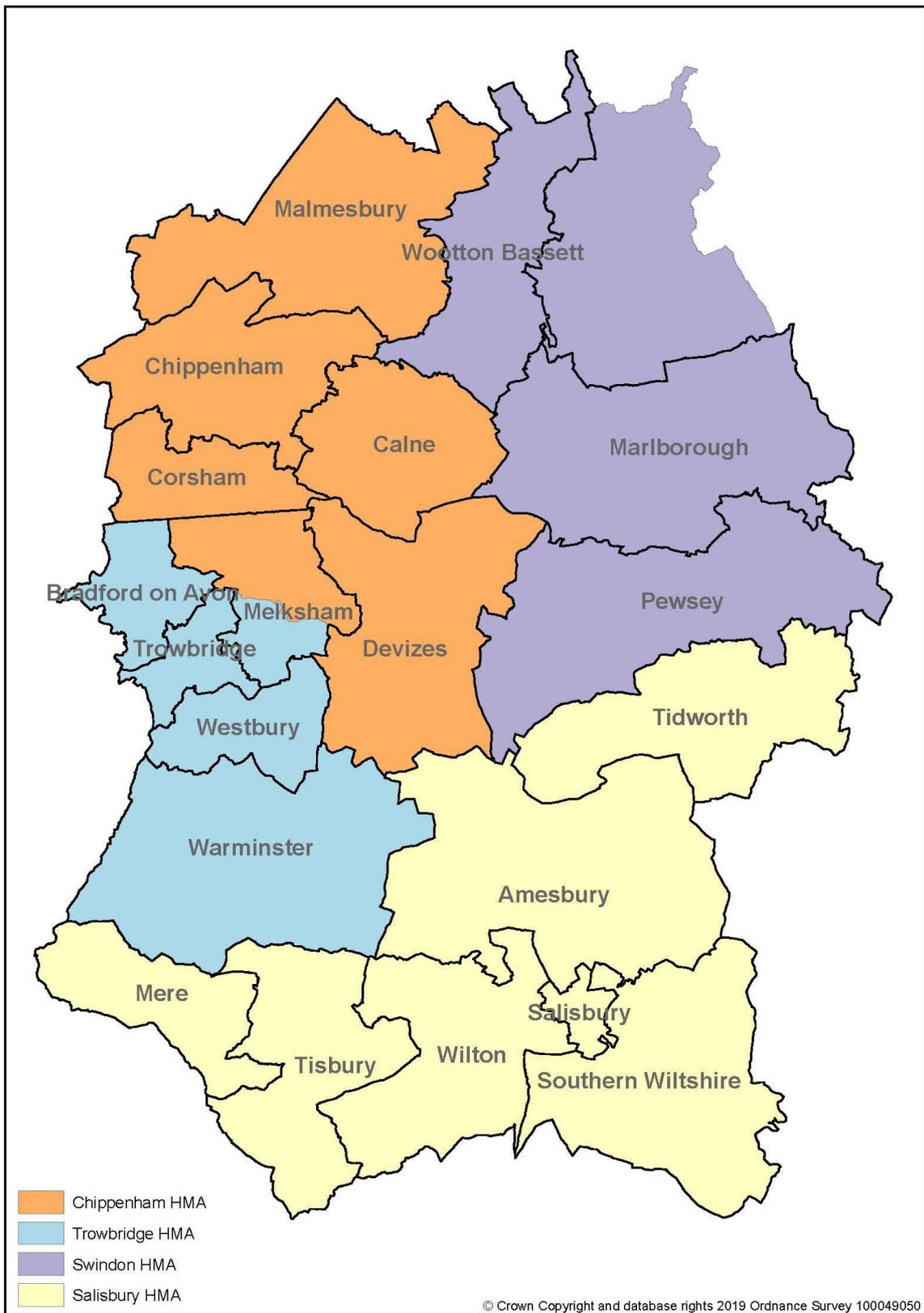
Planning for Westbury (39 comments, 33 respondents)	
Respondent Type	Main Issues Raised
Prescribed bodies including Town and Parish Councils	<p>Scale of growth</p> <ul style="list-style-type: none"> • Town Council considers that for the scale of growth to be sustainable, the following need to be addressed: <ul style="list-style-type: none"> - A350 congestion and air quality management - Sustainable transport and linkages - Town centre recovery and regeneration - Affordable housing delivery • Some support for less housing balanced with employment growth. <p>Place Shaping Priorities</p> <ul style="list-style-type: none"> • Town Council supports emphasis on infrastructure delivery, sustainable transport links and provision of open space.

	<ul style="list-style-type: none"> • Town Council highlights need for bypass, railway crossing from Mane Way/ Oldfield Road and better pedestrian links. • Town Council generally supports protection of employment areas, particularly at West Wiltshire Trading Estate but considers that former Westbury Ironworks due to its location by the station could have a more flexible approach to allow for greater diversity of uses and higher density to support economy of town. • Town Council highlights need to protect heritage assets and landscape setting of town and improve range of facilities and services. <p>Pool of Sites</p> <ul style="list-style-type: none"> • Town Council (with AECOM) identified those sites from the pool of sites they consider potentially suitable to progress <ul style="list-style-type: none"> - <i>Potentially Suitable:</i> Sites 4, 7, 8, 9, 10, 12 - <i>Not supported:</i> Sites 3, 5, 6 - <i>Not assessed:</i> Sites 1 and 2 (outside of Westbury Neighbourhood Plan boundary), and Site 11. • Town Council (with AECOM) considered that SHELAA sites 229, 3679 should be considered, and not excluded at stage 2. • Natural England objects to Site 6 because of unacceptable landscape impact. • Sport England objects to Site 11 (Land at Redland Lane) unless playing fields are replaced or surplus to requirements. • LaFarge Cement Works is identified as potential brownfield site, instead of greenfield. <p>Other</p> <ul style="list-style-type: none"> • Town Council supports brownfield target based upon previous years development; sees neighbourhood plan playing key role in delivery. • Town Council identify range of infrastructure alongside those identified in the consultation document. • Chapmanslade Parish Council highlight the impact of growth (past and present) on surrounding parishes, e.g. A3098 and Chapmanslade. • Westbury Leigh Primary School opposes more development to east of town, which has resulted in declining numbers for primary schools on the west. • Regeneration of town centre supported as priority, including improving air quality, range of shops and more housing. • Need for further employment questioned given existing areas and land.
Developer/agent	<p>Scale of growth</p> <ul style="list-style-type: none"> • Support higher level of growth at Westbury that could include additional housing required if plan period is extended. • Westbury is least constrained settlement in housing market area.

	<ul style="list-style-type: none"> • Some question how the precise figure of 1,820 homes was derived (down from TR-B growth option figure of 2,920). <p>Place shaping priorities</p> <ul style="list-style-type: none"> • Priority 4 needs to be addressed with a transport strategy, outlining delivery, sustainable travel and identify site-specific measures. <p>Pool of sites</p> <ul style="list-style-type: none"> • Further site assessment should consider the more detailed site assessments undertaken on behalf of the Town Council for the neighbourhood plan and, also include more recent confirmation of site availability. • Sites 1,2,3,7 and 10 are being promoted. • Calls for five sites that have been rejected should be re-instated. • New sites were promoted: southwest of Petticoat Lane, Dilton Marsh; at the former Westbury Cement Works; and Titford Farm, Westbury. <p>Other</p> <ul style="list-style-type: none"> • Oppose bypass because of little evidence of need. Other strategies to reduce congestion and air quality may be more appropriate e.g., enhanced rail services. • Unconvinced of scale of education requirements in the town - Council's evidence shows a likely 17% drop in the proportion of under 14s by 2036. • Support for a more flexible approach to the future of the Hawke Ridge Employment Allocation if evidence shows little prospect of delivery.
General Public	<p>Scale of growth</p> <ul style="list-style-type: none"> • The scale of growth is too high, without commensurate level of infrastructure investment (e.g. schools, GPs/ dentists and transport, including a bypass) <p>Place shaping priorities</p> <ul style="list-style-type: none"> • Priority 4 is most important - the A350 is a major problem. <p>Pool of sites</p> <ul style="list-style-type: none"> • Site 6 had most objections. There were also objections to Site 7 because of landscape and biodiversity concerns, and Site 11 as an existing playing field. • Site 10 had most support because of its proximity to existing housing/ employment developments, good transport links and opportunity to realise bridge over railway. • Other sites received a mixed response, or some objections (i.e. 1, 2, 3, 8 and 9).

	<p>Other</p> <ul style="list-style-type: none">• Most prevalent concern expressed is need for A350 bypass to combat traffic congestion, poor air quality and road safety.• Support for other transport improvements at Oldfield Road, a bridge over the railway off Mane Way and a shuttle bus between the railway station and town centre.• Improve town centre - challenges include traffic problems, range of shops and pedestrian safety.• Support for higher brownfield target and less, if any, further greenfield development• Support for better housing design, lower density, more open space, carbon neutrality and adequate parking provision• No demand for further employment provision, with Hawke Ridge remaining unbuilt and proposed housing near railway station likely to benefit commuters
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APPENDIX 2: Housing Market Areas (HMAs), Wiltshire



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Wiltshire Council

Cabinet

29 June 2021

Agenda Item 6 – Wiltshire Local Plan Review Update

Question from Adrian Temple-Brown

**To Councillor Nick Botterill Cabinet Member for Development
Management, Strategic Planning and Climate Change**

Statement

I attended the Strategic Planning Committee (SPC) Incinerator meeting yesterday to see how the local government works and to be honest, I'm still reeling. I have learnt a very, very difficult lesson:

No matter how expert you are, no matter how valid your opinion, no matter how well-founded your emotion, no matter how big your cause, or how large your numbers, you will not be listened to by the conservative majority of the committee unless you are advocating increased Economic Growth, which is Wiltshire Council's single, key, prime and only core policy.

The chairman of the committee went to great lengths to tell the committee members to give very little weight to anything and everything said by the informed public, received verbally, by written communication or through public consultation. He went on to explain that the committee members had no responsibility for any form of damage caused by their decision, because none were expert enough in any subject related to the decision set before them, didn't need to find out and it didn't matter anyway because national government would correct their decision if they got it wrong. Most risible was his statement that the decision should not fall along party lines. The ***Planning Officer*** then 'made the case' for the developer with a 20 minute presentation !!! Most depressing was the realisation that this group of conservatives control the raw power of money in our county.

Correction – their county.

I was ... disgusted.

To address your Leadership by Example in these times of climate and ecological crisis: I'm seriously considering cancelling my GSHP installation, dusting off my '57 3.4L Jag to drive regularly, skipping my windsurf kit & buying new, then driving daily to the coast to learn to carve gybe in my '67 Oxford; there's certainly going to be a great deal more wind in the coming years because your Local and National policy *accelerates* climate change – so, why not plan to enjoy it ?

As for this 24-hrs-to-respond agenda "consultation" and "next steps" ... ho ho ...

The leader of the council will whip his acolytes prior to the final meeting, the chair of the SPC will make the same greasy speech, the same impassioned public performance will be endured by the moneyed and the same result will be voted through:

Economic Growth, tick VG.

Next project, Sir Developer, if you please.

Question 1 - (21-166)

Why not cut the hypocrisy associated with claiming to actually *care* and just say it how it is:

We only care about money and we're going to make a shedload of it with "build, build build" ?

Just stating the truth would save those who care about all the other things a lot of time and effort.

And of course, it would save you council types a heap of cash.

Just Tell the Truth ... perhaps just the once in your upcoming term ?
Pretty Please ?

Response:

The planning application for the energy from waste facility at Northacre Industrial Estate was considered against the policies of the Development Plan and all other material considerations, in accordance with planning legislation. As explained in the report to the Strategic Planning Committee, the Development Plan policies are supportive of such development in this location, the Estate being designated as an area suitable for strategic scale waste treatment type uses. In terms of both the national and local 'Waste Hierarchy', an energy from waste facility qualifies as a 'recovery' operation and so fulfils the two roles identified in national planning policy for such facilities – namely to generate low carbon power and to treat waste so as to divert it from landfill.

It follows that the application was considered, and decided, in the context of both local and national land use planning policies which are supportive of such development. All other matters of detail - relating to, for example, traffic, ecology and amenity - were also taken into account, but none were of sufficient concern to justify a refusal of planning permission.

Wiltshire Council

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29 June 2021

Agenda Item 6 – Wiltshire Local Plan Review Update

Question from Anne Henshaw – CPRE Wiltshire

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

Statement

Given the recent very public loss of support for the housing and road proposals for Chippenham by the local MP and Town Council, does the Council now accept that its policies must be formed by better evidence which is responsive to what its residents wish, not on what speculative development financial return seeks?

Will the Council;

Question 1 – (21-167)

Make public the agreement with Homes England in order to gain effective participation by the Chippenham communities on a way forward.

Response:

Following questions about the publication of the GDA HIF Agreement advice was sought from Homes England. Their advice is that the GDA should not be published.

Agree that;

Question 2 – (21-168)

The Council must now deliver the commitment to understanding the consultation responses from the public, and that the lessons of avoidance of unacceptable proposals, not merely mitigation, be built into the Local Plan Review.

Response:

The Council is committed to a fair consultation process, which involves taking into consideration the views of all stakeholders including the local community.

Question 3 – (21-169)

The re-visiting of the housing numbers is based on proper evidence of present and future local housing need and mechanisms are explored to meet the essential future

local employment growth.

Response:

As set out in the Cabinet report, the proposal is to undertake further work in response to the consultation and the need to update parts of the evidence base including housing need and employment growth is recognised.

Question 4 – (21-170)

The brownfield figures for the county are properly scrutinised and more rigorously assessed for Homes and local Employment.

Response:

This point has been made in the consultation comments and will be given due consideration alongside other comments in preparing the draft Plan.

Question 5 – (21-171)

The review of the Transport Strategy is radical and closely integrated with the Local Plan Policies.

Response:

Transport assessments and evidence are an integral part of a Local Plan and the report recognises that further studies are needed to inform the development of the draft plan (paragraph 30).

Wiltshire Council

Cabinet

29 June 2021

Agenda Item 6 – Wiltshire Local Plan Review Update

Statement from Bill Jarvis

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

Statement

Climate

Having just approved a development that will cause more CO2 emissions than all the development in the County and for the next 25 years, your proposed Local Plan development now needs to become significantly carbon negative and “15 minute” developments mandatory to reduce car journeys by some 150,000km per year simply to support the private business you have just licensed.

This appears to be a legal requirement as indicated in your report p27 reference to the Planning and Compulsory Purchase Act “*Development plan documents must (taken as a whole) include policies designed to secure that the development and use of land in the local planning authority's area contribute **to the mitigation of, and adaptation to, climate change***”.

Developer inclusion

In the short time available to review the update report, a significant issue is the weight you are putting on developer concerns as to where housing is best placed and developed.

The Local Plan is for the County and its people, not a charter for developers. Statements such as “...the development industry was generally either supportive of the higher number or considered it should be raised further to boost housing and deliver more affordable homes...” And “...developers, suggesting higher scales reflecting the role of the town...”, AND, on brownfield sites “...Developers considered that this source should not be relied upon...” AND “ ... Local communities were cautious about further growth, whereas those with a development interest sought an increase...” AND “...” General support ... developers for the proposed scale of growth...” are stating the obvious at its most polite.

The development industry (house builders) will inevitably see large house numbers and greenfield building as a good thing. Surely they are there to deliver what the people of Wiltshire want, not to be the driver behind development of the County.

Specifically, you refer to developer concerns regarding the costs of addressing the need to address zero carbon development. “...a significant lobby from the development

industry who stressed a rapid transition to net zero carbon development would be unduly costly. Developers questioned the Council's evidence on the true costs of building to zero carbon standards..."

The markets will drive pricing and a competitive market place will resolve costs. I repeat my earlier statement, the Local Plan is not a charter for developers.

Local Plan extension of validity

Also, having the Local Plan be extended to 15 years would mean no meaningful change in policy for that time. The existing period is bad enough and you only have to look back 15 years from today to see what a straightjacket that would be. A better solution would be to have 3 year interim reviews of local plan policy to give flexibility to responding to change in the same way any business does. This might mean more effort, but it would at least ensure that the Council were proactive and not reactive to change.

Extension to enable Public Comment

There is much more in this report that needs consideration by the many people who have already contributed.

Please enable the people you are there to serve the time to do so by having a further debate at your next cabinet meeting.

Response:

While we don't normally provide written responses to Statements, there are a few matters that require clarification.

Firstly, the report does not give weight to developer's comments or anyone else's. It is intended to provide an initial summary of the main issues that were raised through the consultation and highlight some of the key areas where the evidence base will need to be developed further; including an assessment of the potential to achieve net zero carbon development.

Secondly, there is no need to allow people to comment on the outputs of a consultation, as these are a matter of fact.

No decisions are being made at this meeting on policies for the draft Plan. As set out in the report (paragraph 5), once the draft Plan has been prepared it will be brought back to Cabinet and onto Council for approval before a further stage of public and stakeholder consultation is undertaken.

Wiltshire Council

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29 June 2021

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Question from Charlie Caffyn

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

Question 1 (21-172)

In view of climate issues and the need for biodiversity, how can the amazing natural habitat that is the golf course (otters, badgers, bats etc) even be considered, this area needs and must be be conserved, once built on there is no turning back.

Response:

Similar concerns have been raised about this site through the consultation and will be given due consideration alongside other comments in preparing the draft Plan.

Question 2 (21-173)

Infrastructure in Braford on Avon is already stretched, and the access to the Golf Course site is untenable, all roads leading to the site are via residential areas, and with the on street parking are in affect single lane roads through built up residential areas populated with many children and young families.

Why has Wiltshire council continued during the consultation process to seek a Joint Venture (JV) partner offering county owned farm land to development partners? It is even prepared to offer land outside of Chippenham to seal the deal!

Response

See response to Question 1.

There is no Joint Venture in relation to Bradford on Avon.

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Question from Charmian Spickernell

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

Statement

The message from Consultation 18 and from the Parliamentary Committee's responses to the Planning White Paper is loud and clear. Does the Cabinet agree that:

Question 1 – (21-174)

The need now is to plan for the environment and climate change, health, education and transport infrastructure, jobs and the range of housing needed, prioritising brownfield re-development?

Response

These are all matters that need to be addressed in the preparation of any Local Plan in line with the National Planning Policy Framework.

Question 2 – (21-175)

The housing numbers need to be re-visited so they are calculated and allocated according to need rather than allowing for the wider opportunities pressed for by developers?

Response

As set out in the Cabinet report, the proposal is to undertake further work in response to the consultation and the need to update parts of the evidence base including that relating to housing need. The Local Plan needs to be based on robust evidence.

Question 3 – (21-176)

Experience has shown that building on the periphery and not re-developing in the town centre leads to serious economic decline?

Response

In developing the draft Plan, consideration will need to be given to the health of town centres and the potential for their regeneration as well as planning for the growth of places through greenfield expansion.

Question 4 – (21-177)

Wiltshire Council will give continued strong support to effective Neighbourhood Planning?

Response

The Council will continue to support communities to prepare their neighbourhood plans as we have done in the past.

Wiltshire Council

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29 June 2021

Agenda Item 6 – Wiltshire Local Plan Review Update

Statement and Question from Chris Caswill

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

Statement

The authors of the Appendix which forms the basis of the proposals to Cabinet admit that there has been a large response to the Council's Local Plan initial consultation, and that they have been able to produce only a preliminary account of the responses. Yet the intention is that the process moves forward on this very preliminary attempt at analysis which offers no proper account of the number, and content of critical or supportive responses. So that this paper is altogether premature and should have been deferred to a later meeting, where at least a more thorough evidence could have been available to the Cabinet and for the public to examine.

It is now also proposed that that more thorough account should not be brought back to cabinet, let alone the Council and only signed off behind closed doors by a Cabinet member. It will then be posted in public as the final account, which will then be evidence for the eventual Examination in Public, with no opportunity for the public to consider and comment on its accuracy and validity. This is democratically unacceptable.

The process is also problematic in the way the response summary gives equal presentational weight to the views of the profit-driven and national 'development industry' and the views of the citizens of Wiltshire in whose name this Plan is being prepared. It is an established fact that the development industry is a major financial contributor to the political party to which this Cabinet and Council majority belong, so this approach to response analysis sends an unfortunate message to the people of Wiltshire – your views are no more important than those of a national industry, many of whose main players are Conservative Party donors. I suggest this is an impression that this Cabinet should take urgent steps to correct, and not just with hot air.

I have seen a preliminary private analysis of Appendix 1, which lists at least 60 different examples of responses which were critical of the original Local Plan proposals, and suggesting changes. Yet the recommendations before Cabinet do not include the expectation that the next steps should take serious account of those objections, which is at best unfortunate and further undermines the Local Plan process. This at least should be corrected by the addition of a clear recommendation to this effect.

Response:

While we don't normally provide written responses to Statements, there are a few

matters that require clarification.

Firstly, the report is in response to a resolution of Cabinet on 1 December to receive a report on the main issues raised. It is intended to provide an initial summary of the main issues that were raised through the consultation and highlight some of the key areas where the evidence base will need to be developed further. This is not to the exclusion of all the other necessary steps that need to be taken to develop a sound plan based on evidence including as is made clear within the report proper consideration of all consultation responses.

Secondly, there is no need to bring another report back to Cabinet as the consultation report when completed will be a factual summary of the responses received. There is no need to allow people to comment on the outputs of a consultation, as this is a statement of fact.

No decisions are being made at this meeting on policies for the draft Plan. As set out in the report (paragraph 5), once the draft Plan has been prepared it will be brought back to Cabinet and onto Council for approval before a further stage of consultation is undertaken.

Question 1 – (21-178)

I submitted a detailed response to the Local Plan consultation which drew on national evidence and examples to make the point that the Local Plan proposals ignored, and should not ignore, the economic and social benefits that local farms bring to Wiltshire communities now, and the opportunities for these benefits to increase in the future with new environmentally friendly agricultural approaches. I also drew attention to the specific opportunities that public ownership of County Farms provide. In Appendix 1 I see there are only three brief and similar references to retaining farms for food production, one of which mentions County Farms, and one similarly brief which mentions Chippenham farms being retained for agriculture. This reductionist tick box approach has the effect of obliterating the argument and evidence about the social and economic benefits of local farms and their potential in the future. I am confident there are hundreds of other detailed arguments about the weakness of the Council's Local Plan proposals and consultation, similarly reduced in effect and attention by this bean counting approach.

What steps have you taken, or will you take, to ensure that the Council has the capacity and appetite for the competent review of consultation responses from the public and Town and Parish Councils that is needed to produce credible and useful evidence for decision making – evidence that is adequate for the Local Plan process and for giving confidence to the public that their views are being taken properly into account?

Response:

The initial summary of main issues, as you rightly point out, does refer to the issue that you raised through the consultation about the importance of retaining farms for food production. As a high-level summary, it provides the reader with an understanding of the issues that have been raised rather than the detail, which are in the representations themselves and will be published in due course. Officers have and will continue to use

the detailed comments received in taking the work forward. I can assure you that the views of all stakeholders are being taken into consideration.

Question 2 – (21-179)

As far as I can recall this is the first time that an account of responses to a planning consultation by this Council has given equal billing and apparent presentational weight to responses from the 'development industry', alongside an aggregation of responses from the public, and Town and Parish Councils. It is a clear statement that this Council does not believe in the primacy of its residents and its constituent Councils

(a) Why has this happened now?

Response

The report does not give weight to the comments from the development industry or those received from anyone else. It is intended to provide an initial overview of comments received. It is normal practice for local planning authorities to group responses received to consultations from different types of respondents.

(b) And (b) What right does a national industry whose primary aim must be profit have to comment substantively on issues such as local place shaping, the needs of Wiltshire rural communities, and local ambitions to address climate change?

Response

The development industry carries out business in the area and has a right to comment on consultations like other stakeholders. Paragraph 3.2 of the Council's adopted Statement of Community Involvement defines 'Our Community' as meaning "*residents, businesses, community and interest groups, town and parish councils, developers, adjoining local authorities...*".

Wiltshire Council

Cabinet

29 June 2021

Agenda Item 6 – Wiltshire Local Plan Review Update

Questions from Dr Helen Stride

**To Councillor Nick Botterill Cabinet Member for Development
Management, Strategic Planning and Climate Change**

Questions are linked to supporting documents, appendix 1

Question 1 – (21-180)

The point has been raised that the impact on the environment of the plans for housing in Chippenham and other areas, will be too great. By what date will WC have conducted an assessment of the environmental impact of its local plan?

Response:

The plan will be prepared to meet the tests of soundness as set out in the National Planning Policy Framework and legislative requirements. It will need to be underpinned by evidence and support the delivery of sustainable development across Wiltshire. Both Sustainability Appraisal and Habitats Regulations Assessment are an integral part of the Local Plan process.

When the draft Plan is completed and published for consultation this will be accompanied by the necessary evidence to support it, including the environmental assessments referred to.

Question 2 – (21-181)

Why do housing plans unnecessarily exceed the standard method requirement?

Response:

The Government's National Planning Policy Framework requires that plans "as a *minimum*" seek to meet the area's objectively assessed needs. So, the Government's standard method is the minimum level that should be planned for. There may be local evidence that suggests a higher figure.

Question 3 – (21-182)

When will carbon accounting and measurable carbon targets be included in the plan to ensure that WC meets its own target of being carbon neutral by 2030?

Response:

In developing the plan regard will continue to be given to the Wiltshire Council climate emergency declaration. It is too early to say what policies will be included in the draft plan as these will need to be based on evidence.

Question 4 – (21-183)

By when will WC have conducted an evidence based, flood risk assessment of the impact of the proposed housing and feeder road in the Avon and Marden valley, on Chippenham and the surrounding villages?

Response:

A Strategic Flood Risk Assessment has already been prepared to inform the plan (see [Link](#)). We will continue to work with the Environment Agency to ensure that flood risk is appropriately addressed in preparing the draft Plan and where necessary more detailed assessments are undertaken.

Wiltshire Council

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Agenda Item 6 – Wiltshire Local Plan Review Update

Statement and Question from Gail Delahaye

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

Statement and Questions

I am writing to express, amongst other things, my disappointment that the Local Plan Responses and next steps have been added to the cabinet meeting agenda at such short notice. Apart from the fact that many people may not revisit the agenda regularly it has left them with little if any time to respond by 12 noon today.

I have had very little time myself but these are things I have been able to identify. I am a Chippenham resident so some are town specific but many are equally applicable to other areas of the County.

- The surveys and statistics used in the formulation of the plan were pre Covid and pre Brexit and we all know that these events have had a large impact on both employment and industry generally. The end results of these changes are still not completely clear so new needs assessments need to be made.
- High street shopping is changing but town centres must remain as a destination to keep the heart of the town. This may well mean less shops but many still have attractions which should be improved and promoted e.g. Chippenham has the river side which could be improved visually at the very least.
- Development to the north east side of Chippenham will be out on its own, similar to Pewsham, so traffic/transport will still have to go to facilities such as shops, doctors, dentists, superstores etc adding to the load on the existing roads. The present infrastructure won't cope. Presently at peak times such as bank holidays and Christmas there are insufficient parking spaces.
- The proposals do not address climate change issues yet a carbon zero target has been set!
- The proposed housing numbers are disproportionate to both the need and the locations. We need to see the evidence of this need!
- The effect on green spaces and countryside is very detrimental to both nature and to the people who enjoy and benefit from it. It plays a big part in peoples mental health and well being as well as providing an alternative traffic free route for cyclists. Putting in a distributor road that slices across such a well used cycle path and other footpaths is unacceptable.

I could say much more but time is against me and so much has been previously said by many others.

I would ask the following -

Question 1 – (21-184)

Given the large of objections, with very good reasons, from public, councillors and our local MP, will the Cabinet accept that the HIF bid is no longer relevant and feasible to meet current and future needs?

Response:

A report on Future Chippenham is being brought to Cabinet on 13 July.

Question 2 – (21-185)

Will they now liaise and listen to local councils and communities as they are the people that live there and know the area so well?

Response:

In respect of the Local Plan, we are listening to the comments made on the recent consultation as expressed by local communities and other stakeholders. It is important that we take into consideration all comments made not only in relation to Chippenham but for the whole of Wiltshire as we move forward in preparing the draft Plan.

Once the draft Plan is completed, this will be considered by Cabinet and Council before it is published for consultation.

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Agenda Item 6 – Wiltshire Local Plan Review Update

Statement from Ian James

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

Question 1 – (21-186)

Para 4

- a) The council failed to publish the 17 webinars to the public. Many residents were working at the time of the arranged sessions. Does the cabinet member consider 1300 attendees a good response from a population of 500,000 in Wiltshire?

Response:

Yes, the attendance was good. These were held at 7pm to avoid the normal working day. We did publish the presentations from the webinars after the events for people to see, as well as a write up of the questions asked at those sessions.

- b) Arrangements were made in the last week of the Consultation for people that did not have internet access to have a paper copy of the Local Plan. Please provide the names and addresses who received such copies to their Parish Clerk so that there is a record of just how many copies the Council sent out.

How many copies did the Council distribute to those with no internet access?

Response:

People could ask for hard copies of documents throughout the consultation, this was not limited to the last week.

All requests were dealt with at the time they were received but we do not have specific numbers of how many. We would not be able to provide details of who they went to due to data protection issues.

Question 2 – (21-187)

Para 10

- a) The complexity of the responses is entirely the Council's making. Many

members of the public could not understand the process, running two Consultations at the same time was confusing for many, and the documents were hard to find on the Council website. Many I am told just gave up.

Was the software used for the Webinars piloted if so are those comments and feedback available to the public to view?

- b) Why were many of the public excluded from the Webinars? Was it software issues or did the Council want to keep the numbers low purposely?

Response:

The Local Plan consultation was well publicised with weblinks provided and officers available to assist anyone who was having trouble accessing information.

The software used for the Webinars had been used successfully prior to the Local Plan events. Checks were made when we were alerted to the fact that a few people had trouble logging on and steps taken to improve instructions for people attending subsequent events.

The software was chosen purposely because it didn't limit attendee numbers.

Question 3 – (21-188)

Para 13

The algorithm to calculate the housing figure of 40,840 is the 2014 algorithm, the later 2018 one has reduced number of houses. Why has the council gone with a higher figure?

Response:

The 40,840 figure referred to in the consultation reflected the standard methodology calculation at April 2019. As the Government's standard methodology uses inputs that change periodically including an affordability factor, this can fluctuate.

Question 4 – (21-189)

Para 15

Will the Council determine affordable housing numbers of 40% or will the Council rollover and accept the cash from the developers for a lesser number?

Response:

In developing the Local Plan, a viability assessment will need to be undertaken to test options for affordable housing delivery. A level of affordable housing provision will be set in policies that is based on robust evidence to ensure that on-site delivery is maximised. The preference is to see on site affordable housing delivery.

Question 5 – (21-190)

Para 17

It is good to see the Council reviewing the local plan in light of COVID. Will the cabinet member review the housing numbers in Chippenham in the light of less people commuting using the railway station and the M4?

Response:

As set out in the Cabinet report, the proposal is to undertake further work in response to the consultation and the need to update parts of the evidence base including housing need and employment growth is recognised.

The point made about commuting is reflected in the consultation comments and is just one of the many points made that will be considered in looking at the spatial distribution of growth.

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Statement and Question from Isabel McCord

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

Statement

If I want to attend the Cabinet meeting I understand I have to do so in person. This means a car journey to Trowbridge from Chippenham and then an indeterminate time spent at County Hall waiting for my specific agenda item. This is not good use of my time when I could be economically active, and neither is it good for the environment. There will be other residents who do not wish to attend in person due to Covid concerns. How is it that you had the technical know how to consult online in the recent consultations on Future Chippenham and the Local Plan and yet do not give the public remote access to Cabinet and committee meeting. In the interests of public engagement with your residents remote access is required.

The Local Plan Update records at Appendix 1 significant objections to the scale of housing growth proposed for Chippenham. The report notes the evidence base for housing numbers and employment land needs reviewing in the light of the consultation submissions. If you look at the responses from Chippenham Town Council and Bremhill Parish Council you will see both councils were against the number of houses proposed for Chippenham and Bremhill Parish Council. In the light of these submissions and those of the general public opposing the numbers, and the need to review the numbers, surely this increases the risk that you will not deliver the number of houses in the right location in Chippenham and Bremhill Parish to meet the requirements of the HIF. As the HIF agreement with Homes England has not been published I, along with other Wiltshire Council residents, do not know how great this risk is and what impact taking such a risk would have on Wiltshire Council.

Question 1 – (21-191)

In the interests of transparency and public confidence please will you now publish the agreement as promised by your predecessor.

Response:

Following questions about the publication of the GDA HIF Agreement advice was sought from Homes England. Their advice is that the GDA should not be published.

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Statement and Questions from Jane Durrant – Lacock Parish Council

**To Councillor Nick Botterill Cabinet Member for Development
Management, Strategic Planning and Climate Change**

Statement

We would like to raise our concern with regard to the fact that this meeting has been called at short notice with no notification. It is only today we have been made aware of this by a local resident and today is the deadline at midday for questions to be submitted.

This is completely unacceptable for an issue of such major significance to everyone impacted by this Local Plan and appears to undermine any due process. The Wiltshire Council local plan website has had no updates for some while on any progress or next steps.

Question 1 – (21-192)

On behalf of Lacock Parish Council we would like confirmation that the additional 5000 houses have now been removed from the local plan.

Response:

No decisions are being made at this meeting on policies for the draft Plan. As set out in the report (paragraph 5), once the draft Plan has been prepared it will be brought back to Cabinet and onto Council for approval before a further stage of consultation is undertaken.

It is therefore too early to say what the housing requirement should be. Further work needs to be undertaken in response to the consultation on key parts of the evidence base including testing the upper and lower levels of housing need and spatial distribution of growth for the plan period.

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Statement from Janet Giles

**To Councillor Nick Botterill Cabinet Member for Development
Management, Strategic Planning and Climate Change**

Statement

Like the cabinet I have just ploughed through the 158 pages of the support pack for this meeting including the comments made in relation to the Local Plan Review for Wiltshire. Whilst I have previously read individual and area specific proposals, the impact of reading this report entire is shocking.

There is an overwhelming feeling that all of Wiltshire is being bombarded with developments they neither want nor need. We are a rural county with rural communities, market towns and villages and we do not want an urban sprawl imposed on us under the guise of “affordable housing” or any other Government algorithm.

Our countryside with rolling hills and canals is our biggest asset and we are planning to ruin it to comply with metropolitan edicts. People need houses where there is employment and there is no plan for expansion of that in our market towns so new housing sites will become dormitories and out of county journeys will further impact on climate change. More journeys, more roads, less carbon neutral.

COME ON WILTSHIRE JUST SAY NO TO SHEELA.

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Statement and Questions from Jeremy Wire

**To Councillor Nick Botterill Cabinet Member for Development
Management, Strategic Planning and Climate Change**

Statement

I resent that my right to question this key decision by cabinet has been reduced to a few hours in the dead of night. There are lessons to be learnt here from the Chesham and Amersham by election where a strong Conservative majority was overturned because the electorate felt they were being taken for granted and overlooked specifically with respect to planning regulation.

I expected more from the new council after the lead party lost 10% of its seats in the latest local election. The electorate need to be able to have their say in a timely manner. You seem to have rushed this proposal to a decision to facilitate further landbanking by the development profiteers.

It is disproportionate to break down the responses into two strands without giving an indication of the numbers of responses from each side. This will give undue weight to the lesser responses.

Question 1 – (21-193)

Why is it deemed satisfactory to do it this way?

Response:

The report is intended to provide an initial summary of the main issues that were raised through the consultation and highlight some of the key areas where the evidence base will need to be developed further. It is normal practice to group comments into different types of stakeholders and to provide a summary of the points they make. The intention is not to give weight to any set of comments over another.

Question 2 – (21-194)

My second question relates to bullet point three of item 3 of the proposal to Cabinet: 'Wiltshire wide assessment of potential for renewable energy, zero carbon development and off grid energy networks at main settlements'. I would remind you that ALL development needs to be zero carbon if we are to address the greatest crisis facing humanity in its existence. Why is this being ignored?

Response:

This point about all development being zero carbon has been raised through the consultation and will be given consideration.

The Local Plan will need to be based on evidence and as such further assessments are needed to see whether this is possible at the present time.

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Statement from Kim Power

**To Councillor Nick Botterill Cabinet Member for Development
Management, Strategic Planning and Climate Change**

Statement

Malmesbury is a small market town in the rural north of the County. How our historic town grows and develops is of considerable importance to the people who live here, so much so that we made the first Neighbourhood Plan in Wiltshire, which is successfully delivering housing and well exceeding targets.

However, over the last year or so, amendments to the NPPF and other planning changes have meant planning permission has been given for housing which is not in our Neighbourhood Plan and was objected to for other reasons. Unfortunately, there are more of such applications in the pipeline. This situation is of great concern to residents, especially given the Government's 'Planning For the Future' White Paper, which appears to further reduce local influence and decision making.

Question 1 – (21-195)

So, what does the Cabinet consider will be the effects of the Government's on-going planning reforms in respect of the Wiltshire Local Plan and also the weight and role given to Neighbourhood Planning?"

Response:

It is too early to say what the effects of the Government's future planning reforms will be in respect of the Local Plan and Neighbourhood Planning. This will need to be monitored as the plan progresses.

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Statement from Kim Stuckey

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

Statement

This update on the Wiltshire Local Plan has been produced before the full Consultation Report has been completed. It is not apparent what selection criteria was used by officers to select comments for inclusion in Appendix 1 or the weight of numbers that “support” or “object to” a particular comment.

It appears the full Consultation Report will not be approved by Council or Cabinet in a formal meeting, with the associated opportunity for the public to comment on it. For this reason the agenda item appears premature.

The report in Appendix 1 gives as much weight to Developer and Agent comments as to those of the Public and Town/Parish Councils lumped together. It appears from the report that Wiltshire Council is where every developer matters. Surely a Local Plan should be shaped by local people and groups plus their elected representatives. There should then be a parallel and separate process of identifying possible sites from promotion by landowners and developers, with their comments taken there.

Finally the Proposals for the Cabinet to agree on Page 2 of the Review seem to miss some major areas of further work that need to be addressed the review of the local plan, in particular:

- A review of the impact of COVID on working and transport requirements, particularly home working, provision of fast broadband, reduced car and public transport dependence and design of houses to support homeworking.
- A review of Principal settlement town centres for brownfield opportunities, especially the mix of retail vs housing in the light of changing retail patterns leading to unoccupied premises.

These should be added to the list of items in Part iii of the Proposals.

Response:

While we don't normally provide written responses to Statements, there are a few

matters that require clarification.

Firstly, the report is in response to a resolution of Cabinet on 1 December to receive an update report on the main issues raised.

The report does not give weight to developer's comments or anyone else's. It is intended to provide an initial summary of the main issues that were raised through the consultation and highlight some of the key areas where the evidence base will need to be developed further. This is not to the exclusion of all the other necessary steps that need to be taken to develop a sound plan based on evidence, including as is made clear within the report proper consideration of all consultation responses.

Secondly, the consultation report when completed will be a factual summary of the responses received. There is no need to allow people to comment on the outputs of a consultation through a committee process.

No decisions are being made at this meeting on policies for the draft Plan. As set out in the report (paragraph 5), once the draft Plan has been prepared it will be brought back to Cabinet and onto Council for approval before a further stage of consultation is undertaken.

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Statement and Questions from Louise Weissel

**To Councillor Nick Botterill Cabinet Member for Development
Management, Strategic Planning and Climate Change**

Statement 1

On the Inclusiveness of the consultation itself: You state:

Executive Summary

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

Equalities Impact of the Proposal

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

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

I continue to argue (as set out in my response to the Local Plan consultation) that this was NOT an equitable or inclusive consultation, not least because it was conducted during Lockdown. The amount of non-online information was minimal, and insufficient to inform the vast majority of older people who were both shielding and not online/IT literate. We have compiled written and verbal evidence for these claims, from angry members of the public who felt excluded by the process. Moreover, no extra time was allocated to give those people who found out later through local word of mouth about the consultation. We (local residents in Bradford-on-Avon), fund-raised & leafletted throughout the town to tell people to respond. The breakdown of the response numbers indicates very clearly that we were successful in our efforts (BonA had by far the greatest numbers of responses & respondents), whereas other towns were not so lucky as to have such vociferous and engaged activists, and because of Wiltshire Council’s mishandling of the consultation, very few responses were received from other market towns. See image below for the numbers as set out in your Appendix 1:

Amesbury (18 comments, 18 respondents)
Bradford on Avon (674 comments, 667 respondents)
Calne [no number listed]
Corsham (40 comments, 40 respondents)|
Devizes (118 comments, 111 respondents)
Malmesbury (61 comments, 61 respondents)
Marlborough (52 comments, 48 respondents)
Melksham (102 comments, 95 respondents)
Royal Wotton Bassett (59 comments, 57 respondents)
Tidworth and Ludgershall (14 comments, 14 respondents)
Warminster (25 comments, 24 respondents)
Westbury (39 comments, 33 respondents)

Question 1 – (21-196)

What will you do to ensure that those who have been excluded by the consultation can still have their voices heard?

Response:

All reasonable steps were taken to raise awareness and ensure that people had the opportunity to comment including those without access to the internet. The consultation was carried out in line with the Council's Statement of Community Involvement (Temporary Arrangements) in accordance with Government recommendations for working within COVID guidelines.

Your efforts to help raise awareness are commendable and appreciated. I do not agree though that there was a mishandling of the consultation. The consultation resulted in a good representation of views from within the Bradford-on-Avon community including the Town Council, which will all be given due consideration as the draft Plan is developed.

There will be a further opportunity for people to comment once the draft Plan is prepared and published for consultation.

Statement 2:

On the community response, including that of the Town Council:
You have not indicated in your report, the strength of feeling against the Local Plan Review, as captured in our own Town Council response. See screenshot below:

Town Council Public Statement

Response to the Consultation on the Draft Wiltshire Local Plan



At a full meeting of the Town Council 2 March 2021, to reject the Wiltshire Local Plan in its entirety for not only our town, but the whole county. It is not so much a plan, as an allocation of houses in unsuitable places. It lacks vision for the future of our communities and our county.

It lacks integration and due consideration with other key strategies such as Highways and Blue Green Spaces, and many other infrastructure issues. It does not recognise or take appropriate account of our Neighbourhood Plan. It is, at best, a 'business as usual' plan, intended simply to mark time to 2036; it does not address the Climate Emergency in any meaningful way and would not attain our shared target of Carbon Neutral by 2030, but would take us backwards.

We reject all three green sites proposed for housing, for the reasons laid out below. It clearly does not appreciate the true value of the land for our wellbeing, the environment and biodiversity and how much is lost irretrievably, by developing on these kinds of sites.

Question 2 – (21-197)

How will you address the true and heartfelt concerns of communities which, as Bradford on Avon has done, have outrightly rejected the Local Plan in its entirety? Also: what recognition has been made that we already have a democratically endorsed Neighbourhood Plan, which was made with inclusive community involvement?

Response:

The concerns of the Town Council are fully appreciated as are those of the wider community and will be taken into consideration alongside all other comments received as the plan is progressed. The neighbourhood plan was recognised in the consultation material and will continue to be taken into consideration.

Statement 3:

On Health, wellbeing, access & inclusion:

Environmental Sustainability, and Planning is integral to community health and wellbeing. Therefore, public health, access and inclusion should be at the heart of strategies and proposals. There is no mention in any of the key consultation documents of health and wellbeing, equality, access or inclusion. Housing type, tenure, location, local facilities, access to natural spaces and transport links will impact positively or adversely on residents' health and wellbeing.

It is not good enough, in my opinion, to simply state that Public Health is an unrelated department, upon which Planning has no impact. Planning MUST be made with the health and wellbeing of local residents as a core concern.

Question 3 – (21-198)

How will the Local Plan Review seek to address issues of public health (including health inequalities), access & inclusion? Why haven't the Local Plan key documents included the public health implications of its proposals?

Response:

The consultation was not on a draft Local Plan but designed to inform key parts. Health and wellbeing and accessibility are important issues that flow through Local Plans and are being addressed as the draft Plan is prepared.

Statement 4

Finally: I was told about this Cabinet meeting today – as I understand the documents were only recently (this week) uploaded. You have given members of the public less than 24 hours to submit questions by the deadline of Wed 23 June.

Question 4 – (21-199)

To those who ticked 'YES' on the form asking if we'd like to be kept updated, why were we not emailed about this meeting? This flies, again, in the face of your claims of inclusivity, since even those who are well-connected IT-wise are not kept in the loop. How on earth are people who are not online, to be made aware of when the meetings are and the deadlines for asking questions?

Response:

The report is in response to a resolution of Cabinet on 1 December to receive an update report on the main issues raised. It is a factual report and not taking any decisions on the draft Plan and its content. The tick box on the form is used to notify people about progress on key stages of the plan's preparation, for example, publication of the draft Plan for consultation

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Statement and Questions from Margaret Green

**To Councillor Nick Botterill Cabinet Member for Development
Management, Strategic Planning and Climate Change**

Statement

I have a question for the cabinet about their plan for carbon sequestration to counterbalance their carbon emissions from road building, greenfield housing development and the planned incinerator.

The destruction of natural carbon sinks (green fields) and associated huge emissions from road/housing/incinerator building do not seem to add up.

It is worthy of note that Wales have halted all road building while they resolve similar challenges.

Question 1 – (21-200)

How can Wiltshire hope to reach zero emissions whilst increasing them at this scale and also destroying our natural carbon sinks?

Response:

The points you raise about zero emissions have been raised through the consultation and will be given due consideration as the Local Plan is progressed.

As set out in the report, the Council is mindful of its legal duty to prepare a Local Plan that contributes to the mitigation of, and adaptation to, climate change.

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Statement from Martin Valatin

**To Councillor Nick Botterill Cabinet Member for Development
Management, Strategic Planning and Climate Change**

Statement

- Bradford on Avon Town Council's observation that this is 'not so much a plan as an allocation of houses in unsuitable places is to the point and by no means unfair.
- Developer comments about affordable homes and employment are to a large extent crocodile tears (the main industrial sites here have now all been turned into expensive developer housing).
- Planners have the unenviable task of implementing exponential house building targets set by central government while vainly hoping that this can be done in such a way that will not cause irreversible harm to our environment.
- This is essentially a political crisis, by the recent by election result at Chesham and Amersham, planning without any real plans (apart from housing numbers) may prove electorally unsustainable.

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Statement from Maureen Lawrence

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

Statement

I was surprised to see without warning a report going to Cabinet on Tuesday detailing the responses to the Local Plan and would firstly suggest that this be widely circulated to all parish councils for further comment.

I would like to point out that the webinars held between January and March this year were unable to be accessed by myself and many others so we could not contribute live to the debate. Many people would have been unaware of any consultation.

I live in a large village, Alderbury, near Salisbury which has had significant executive development in recent years resulting in loss of hundreds of trees, habitat, peace and quiet - rural areas attract residents looking for peace and quiet. Alderbury is already the bypass to the A36 bypass as it is routinely used as a rat road, causing significant noise and air pollution exacerbated by this loss of established trees.

I believe the local housing plan is based on the out of date algorithm of 2014 which stated thousands of houses were needed in South Wiltshire, many built on green belt, with no concern for the environment. Importantly the resultant housing is often poorly designed, bland and frequently out of keeping with the heritage of the area and other nearby properties. I am pleased to see that council will be reviewing the needs analysis as clearly Brexit with the exit of Eastern Europeans, plus control on future immigration, Covid, and numbers of deaths and people living with long Covid, will affect any economic data. In addition, the rise in home working plus the death of High Streets to internet use, must change the figures. I would hope that Wiltshire Council will look more sensitively and carefully at places designated for development, looking both at actual numbers required and then the designs of those houses which are passed for planning; properties should be allowed only where they are needed, based on all the economic, social and environmental evidence and especially not at the expense of the environment, to promote a more creative and sustainable vision for the future.

The need for smaller non-executive housing schemes (up to 12) with green areas including tree planting schemes and preferably used as council housing or housing for different needs eg disabled people is paramount in all villages; this will mitigate against further air and noise pollution and allow residents to stay in the area they know. The arbitrary 40% affordable housing figure which developers are supposed to meet doesn't

work as it is promised and then reduced by developers as they claim it is 'uneconomic'. Land banking for years should not be allowed after planning permission is given.

The other two major issues are transport and flooding - in our village there are numerous underground springs which should be taken into account when planning any further development and often are not. Sustainable drainage plans should be considered everywhere. Public transport which works at night and bank holidays, car sharing schemes, people friendly streets in cities and towns which limit the use of cars and lorries should all be considered.

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Statement from Melissa Hillier

**To Councillor Nick Botterill Cabinet Member for Development
Management, Strategic Planning and Climate Change**

Statement

As a constituent of Nick Murry I would very much like to know the answers to the questions he has raised below and to understand more about future development plans for Chippenham. A balance clearly needs to be struck between actual demand for housing and the current plans which seem to create a vast extension of the town. Chippenham is already a dormitory/commuter town with most people driving out of town to work, increasing housing will simply increase current issues around congestion, lack of amenities etc.

Current plans seem to have little or no support from Chippenham Town Council or any residents, and as a resident I can confirm it has been hard to engage with this work as deadlines are short and finding out what is going on often happens by accident (eg stumbling across petitions online!). For something that will have huge impact on the town for the future, I feel more work is needed to bring about reasonable and sensible housing allocation, alongside discussion on amenities and local resources, rather than the current projection of 7,500 houses and a ring road - which is excessive.

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Statement from Cllr Myla Watts – Deputy Leader Chippenham Town Council

**To Councillor Nick Botterill Cabinet Member for Development
Management, Strategic Planning and Climate Change**

Statement

With no advance notice, Wiltshire Council Cabinet has included a paper on the Local Plan Consultation Responses on its agenda. I believe this was only published online yesterday, giving the public around a day to read and digest the lengthy document and send in Statements and Questions for the meeting. I was only alerted to the agenda this morning (23 June) at 9.15am, and only have until noon to send a statement in. However, like many people, I work and do not have time during my working day to read all the information in time to make an informed statement. This is not democracy, this is the Cabinet deliberately trying to push things through without allowing proper public scrutiny. I think this is an appalling misuse of power, particularly given how much public interest there has been in the local plan, and it makes me understand why the general population has so little trust in our elected members.

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Statement and Questions from Richard Ecclestone

**To Councillor Nick Botterill Cabinet Member for Development
Management, Strategic Planning and Climate Change**

Introduction

I am having to be necessarily brief on account of the very short notice provided by the Council to submit statements and questions. I would ask that more notice be given in future to allow citizens the opportunity to fully digest the material being discussed at Cabinet, so as to allow sufficient time to contribute.

Statement

In the Cabinet paper 'Wiltshire Local Plan Review Update' the sections relating to climate change fail to either grasp, or offer proposals to address, the magnitude of the task ahead, i.e. the need to radically reduce greenhouse gas emissions within the county in order to have any prospect of achieving either the legal reduction targets of 68% by 2030 and 78% by 2035 ([hWps://www.gov.uk/government/news/ukenshrines-new-target-in-law-to-slash-emissions-by-78-by-2035](https://www.gov.uk/government/news/ukenshrines-new-target-in-law-to-slash-emissions-by-78-by-2035)), or the local target of net zero by 2030. This is a fundamental flaw in the considerations about the Local Plan and is an omission that must be addressed urgently.

It will be absolutely necessary to measure the embodied and operational GHG emissions impact of the developments proposed in the plan, to identify whether they are compatible with the carbon reduction strategy the Council must pursue if it is to comply with the requirements of the legislation relating to climate change.

The Local Plan identified that climate change adaptation and mitigation strategies must be woven into a number of planning policy areas and act as a 'golden thread' through the plan. Despite the consultation responses highlighting the incompatibility of the proposals with emissions reduction requirements, this is still not evident in the Council's thinking. For example, paragraph 36 of the update, whilst encouragingly affirming the legal duty to ensure policies of the Local Plan address climate change, does not appear to focus on how the plan will contribute to the radical GHG emissions reductions that legal duty requires.

I submit that there is still insufficient understanding within the Council of the radical rethink needed if the climate change targets are to be met.

Question 1 – (21-201)

Will Cabinet commit to ensuring that the Local Plan policies will be compatible with the Carbon Reduction strategy, and ensure that the Local Plan contributes to the necessary GHG emissions reductions, rather than adding to them, thereby making the legal duty to address climate change unattainable?

Response:

Firstly, I would like to reassure you that the report to Cabinet is intended to provide an initial summary of the main issues that were raised through the consultation and highlight some of the key areas where the evidence base will be developed further. This is not to the exclusion of all the other necessary steps that need to be taken to develop a sound plan based on evidence. It is not therefore the complete response to the consultation, which will not be fully formed until the draft Local Plan has been prepared.

As set out in the report (paragraph 5), once the draft Plan has been prepared it will be brought back to Cabinet and onto Council for approval before a further stage of consultation is undertaken.

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Questions from Ros Oswald

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

Question 1 – (21-202)

On Monday the 21st I heard an excellent talk by Paul Robertson about the Community Environmental Toolkit which has been developed by the Council. It included a lot of information about all the steps volunteers can take to improve their environment and reduce the risks attached to Climate Change. What steps is the Council taking to ensure that each element of the Local Plan contributes positively to a significant reduction in carbon emissions in Wiltshire

Response:

Thank you for the positive feedback about the Council's Environmental Toolkit, which has been passed onto the officer concerned.

The point you raise about reduction in carbon emissions have been made through the consultation and will be given due consideration as the Local Plan is progressed.

As set out in the report, the Council is mindful of its legal duty to prepare a Local Plan that contributes to the mitigation of, and adaptation to, climate change.

Question 2 – (21-203)

Why doesn't the Council impose a condition that every new build in Wiltshire must be passive in terms of emissions

Response:

A requirement for all houses to be passive would need to be underpinned by national and local policy and evidence in respect of building fabric and energy performance standards. Work is being undertaken to inform draft policies for the Local Plan on building standards.

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Questions from Rowena Quantrill – Climate Friendly Bradford on Avon

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

Question 1 – (21-204)

First, and most importantly, will the council prioritise reduction of carbon emissions in all its decisions? The effects of climate change are already being felt all over the world and are likely to have a huge detrimental impact on the lives of our children and grandchildren. The council has declared a climate emergency and must act accordingly. Specifically we would like to see the council insisting that all new build housing is built to the highest environmental standards, preferably with solar panels. We would also like to see much more encouragement of onshore wind. As there are welcome plans to encourage electric car use and home heating to be by heat pumps, we will need more and more renewable energy generation and onshore wind turbines are the most economical way to produce this. We would also like to see better and more affordable public transport to reduce car use and thus alleviate congestion and air pollution.

Response:

The points you refer to have been raised through the consultation and will be given due consideration as the Local Plan is progressed.

As set out in the report, the Council is mindful of its legal duty to prepare a Local Plan that contributes to the mitigation of, and adaptation to, climate change.

Question 2 – (21-205)

In light of considerable objections from the local public, has the council re-considered its proposals of three sites for housing development in Bradford on Avon, particularly the old golf course and the allotments. The golf course is of considerable ecological value, particularly as a green corridor, the importance of which is being increasingly recognised and, at a time when the importance of local food and of the benefits to mental health of growing it are also being increasingly recognised, it seems completely perverse to consider building on allotments. We recognise the need for more affordable housing in the town but consider it is possible to provide this by small scale 'infill' developments on brownfield sites.

Response:

Similar concerns have been raised about these sites through the consultation and will be given due consideration alongside other comments in preparing the draft Plan. The Council is committed to a fair consultation process, which involves taking into consideration the views of all stakeholders including the local community.

No decisions are being made at this meeting on policies for the draft Plan or which sites should or should not be taken forward as further work needs to be undertaken.

As set out in the report (paragraph 5), once the draft Plan has been prepared it will be brought back to Cabinet and onto Council for approval before a further stage of consultation is undertaken.

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Statement from Steve Perry

**To Councillor Nick Botterill Cabinet Member for Development
Management, Strategic Planning and Climate Change**

Statement

First, I wish to state that I fully support the statement made to Cabinet by Cllr. Matthew Short, Chippenham Hardens and Central ward. He makes the same points that I and many, many other residents of Chippenham have been making for literally years, and I won't waste your time by going over them again.

Second, there is a petition against the road containing more than 6,000 signatures. Please take notice!

Third, in the CEO's report contained in the documents, it appears to ignore the fact that Chippenham, Calne and Bradford on Avon Town Councils have all unanimously rejected the Local Plan as well as the road altogether! Also the two local MP's have also either not given or have withdrawn their support for the proposals. That must tell you something, as should the fact that Chippenham has totally rejected the Conservative Policies for the town in the recent elections. PLEASE LISTEN to the electorate, not the developers!

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Statement and Questions from Steve Perry – Chair of CAUSE

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

Statement

1. This document is premature. By its own admission, it is not based on a full analysis and it is not safe to use it as a basis for decision making. How can it proprot to be a summary ahead of the full analysis having been completed? The full version MUST come to Full Council or Cabinet in advance of any decisions being made, and must be presented in advance for public scrutiny. It is clearly not acceptable for Cabinet to agree that “the Cabinet Member for Development Management, Strategic Planning and Climate Change signs off the completed consultation report prior to its publication on the Council’s website” before the analysis has been completed and the report published! This Cabinet Member would be signing off on a critical report, on the future of our County, regardless of and potentially in contempt of Wiltshire residents views.
2. The Spatial Strategy for Wiltshire should be determined by the people of Wiltshire, and not by developers or their agents, whose sole interest is in profiting financially. This summary presents the views of developers alongside those of Town and Parish Councils, the public and their elected representatives, *as though they had some sort of equivalence*. The development industry should not determine - or have any major influence on - the Spatial Strategy and the number of houses and their locations within our County. Land-owners and developers are there to facilitate and support the delivery of the Local Pan in strict accordance with its policies (including those of Neighbourhood Plans). To legitimise the development industry views in this way is frankly shocking. For example, comments such as “There is too much emphasis upon brownfield land” which of course support the financial interest of developers, should carry no weight relative to the overwhelming support from towns, parishes and the public to prioritise brownfield sites. It begs the question as to whether Wiltshire Council is representing the interests of the development industry or its residents?

3. Cabinet should take account of the fact that in spite of the above, there is no support whatsoever for the HIF bid, distributor road and associated 7,500 houses. If anything, this should be one of the key conclusions, leading to a proposal that work now be done to dissolve the Agreement with Homes England (which is still being kept secret from the public), in line with the complete lack of any local support, this being a key eligibility criterion. Anything else would be indefensible, unethical and a clear example of Wiltshire Council supporting developer interests over its own residents' interests.

4. Cabinet should also take account of the fact that there is no local support for the Local Plan proposals for Chippenham, and refer to the response recorded in the Minutes below, which states that:
 - i. "The housing target allocated to Chippenham is much too high, bears no relation to Chippenham's actual housing needs and is predicated on substantial numbers of people relocating here, in order to commute back out, causing more congestion and significant damage to the climate;

 - ii. The proposals to develop large suburbs to the East (Site 1) and South (Site 2) would have a severe adverse impact on the town and cause unacceptable damage to the local environment through the destruction of high-quality farmland and wildlife habitat in the Avon and Marden Valley;

 - iii. The Chippenham housing numbers and their location should not be dictated by a grant application for a road, which did not undergo any public consultation, and which serves to predetermine the spatial strategy; and

 - iv. Wiltshire Council needs to develop an alternative Spatial Strategy, which is employment led, "appropriate in scale" and "environmentally sustainable" as stated in the Vision for the Chippenham Neighbourhood Plan."
<https://www.chippenham.gov.uk/wp-content/uploads/2021/03/PET-Minutes-180221.pdf>
<https://www.chippenham.gov.uk/wp-content/uploads/2021/06/Draft-Minutes-Extraordinary-Full-Council-250221.pdf>
<https://www.chippenham.gov.uk/chippenham-town-council-say-no-to-proposed-new-housing-in-wiltshire-councils-local-plan-review-consultation>

The Proposal (ii) on page 16 should acknowledge this and all the other Town and Parish Council objections, by stating that Cabinet "Agrees that progress continues to be made to develop the Wiltshire Local Plan Review in line with the democratic will and clearly expressed views of Wiltshire's residents."

Question 1 – (21-206)

Why has this report been brought forward in such a rush and in an incomplete form to this Cabinet meeting, rather than bringing it forward once the analysis has been completed and the findings shared with the public?

Response:

Firstly, the report is in response to a resolution of Cabinet on 1 December to receive an update report on the main issues raised. It is intended to provide an initial summary of the main issues raised through the consultation and highlight some of the key areas where the evidence base will need to be developed further. There is no weight or bias given to developers' representations, it is merely a record of what comments were made.

No decisions are being made at this meeting on policies for the draft Plan. As set out in the report (paragraph 5), once the draft Plan has been prepared it will be brought back to Cabinet and onto Council for approval before a further stage of consultation is undertaken.

Secondly, there is no need to bring another report back to Cabinet or Council as the consultation report when completed will be a factual summary of the responses received. There is no need to allow people to comment on the outputs of a consultation.

Question 2 – (21-207)

Does the Cabinet agree that the Spatial Strategy for Wiltshire should be determined by the residents of Wiltshire, and not by developers or their agents? Please include a YES or NO in your answer and explain your reasons.

Response:

The legislation governing local-plan making makes it clear that in developing a plan consideration needs to be given to the views of all stakeholders including the local community. This is recognised in the Council's adopted Statement of Community Involvement that defines 'Our Community' as meaning "*residents, businesses, community and interest groups, town and parish councils, developers, adjoining local authorities...*".

Wiltshire Council

Cabinet

29 June 2021

Agenda Item 6 – Wiltshire Local Plan Review Update

Statement from Sue Deedigan

**To Councillor Nick Botterill Cabinet Member for Development
Management, Strategic Planning and Climate Change**

Statement

As a climate concerned citizen of Wiltshire living in Calne Without I was very pleased to see the papers relating to the Local Plan Consultation Responses and that there were in excess of 3,500 representations from 2,682 people and organisations. At a time when it is often said that the public lack the motivation to engage in local politics as they feel that nothing changes and they do not have a voice and are not heard, it is refreshing to see so many have come forward. This I feel reflects the strength of feeling from local people and organisations on this matter.

I would like to thank the Wiltshire Council staff concerned who have sifted through all the responses on a variety of mediums to produce the initial summary and to lay out the next steps. That is no mean feat and I would like to congratulate each and every WC person involved.

As the papers have only just been released, this has not given me enough time to respond properly - indeed I am still digesting them as I type - but I assume this is because they were so many responses. But as I am aware that questions need to be submitted by 12 noon today to be included. I submit the following question as this is what is jumping out at me as I initially look through the papers:

How can developers and their agents who may or may not live in Wiltshire be allowed to influence plans for Chippenham? Their comments seem to reflect only their own vested interests and the profits they can make from a higher number of homes being built with no consideration of the climate emergency and the need for mitigation and adaption plans, the impact of Covid-19 and Brexit. Indeed I note that one of their concerns (point 35 Wiltshire Local Plan Review Update) was the costs involved in a rapid transition to net zero carbon development. This is an incredibly individualistic viewpoint and I am sure fills me and others with horror. The Climate Change Committee recently published their advice to government (<https://www.theccc.org.uk/publication/independent-assessment-of-uk-climate-risk/>) in which they stated that the UK is failing to keep pace with the impacts of a warning planet and on the webinar that I attended they highlighted

the costs involved in converting recently built homes to carbon zero and bemoaned the fact that developers are still pushing through with plans to build more.

Please can I request that Wiltshire Council put its Climate Strategy at the forefront of all planning and development decisions and show brave leadership at this important juncture of human history.

Wiltshire Council

Cabinet

29 June 2021

Agenda Item 6 – Wiltshire Local Plan Review Update

Statement from Susan McGill

**To Councillor Nick Botterill Cabinet Member for Development
Management, Strategic Planning and Climate Change**

Statement

I wish to object in the strongest possible terms to the inclusion in the agenda papers for the Cabinet meeting, 29 June 2021, of a summary of the Council's Local Plan Review Consultation held in March.

A full report of the consultation has not been published in advance of these Cabinet agenda papers. The summary included is not in any way an adequate basis for decision-making.

I am, like the rest of Wiltshire residents (and, presumably, Wiltshire Councillors), unable to check or confirm a single assertion among the many contained in the related documents.

Item 6 must be struck from the 29 June 2021 agenda. It must be reintroduced only when the full results of the Local Plan Review consultation have been in the public domain for sufficient time for Wiltshire residents to have read it.

I remind you of what is written on the Council's Consultation Portal—

“The Spatial Planning Service carries out research and develops the policies that plan for physical, social and economic development in Wiltshire. Mindful of the necessity to protect and enhance our built and natural environment, the spatial planning service works with local communities to deliver change while protecting our heritage for future generations.” (<https://bit.ly/3xBH3bc>)

The Cabinet document takes no account of the aim to “protect and enhance our built and natural environment”. It refers repeatedly to the “development industry” without specifying—

1. The identity of individual “developers” (undefined in the document) included in the collective term “industry”;
2. The number of “developers” included in that term;
3. Most seriously—which “developers” included in the term “industry” have headquarters based in Wiltshire; and the numbers of their permanently contracted employees who live in Wiltshire, thus participating in the lives of their local communities.

The document utterly fails to demonstrate that the Council’s spatial planning department is working “with local communities to deliver change while protecting our heritage for future generations.”

The documents refer to respondents and summarize selected replies to questions in the consultation. They do not support their classifications of those replies by reference to a methodology. They make no attempt to enumerate replies within those classifications.

For example, regarding Chippenham—

Quote<<

- There was a significant amount of objection from the local community to the scale of growth on a variety of grounds, the most common being: environmental harm, traffic congestion, lack of justification and undermining tackling the climate emergency.
- There were considerable objections to new road proposals. Some suggested that the existing road infrastructure is sufficient and some suggested road improvements (e.g. Bridge Centre roundabout and further improvements to the A350 could be made instead).
- Support for Chippenham as a focus for growth came from developers and landowners, although questions were raised about whether the homes could be delivered in the timescale. There were no objections from statutory environmental agencies, pending further details
- Land was promoted as further development for employment at M4 Junction 17. Residential redevelopment was proposed for parts of Langley Park and Emery Gate.
- Possible opportunities from development were seen as local economic benefits (greater self-containment), restoration of the Wilts and Berks Canal and an extensive riverside park.

>>Unquote.

(1) By their use of the passive voice, the authors of the documents not only hold back the underlying data from which they have drawn the above inferences but also the number and identity of those respondents.

(2) In describing “significant amount of objection from the local community” the authors do not say what they mean by *significant*. They confound this omission because *significant* is a statistical term with specific implications for prediction, analysis, and the drawing of conclusions.

(3) In support of their claim of absence of objection, the authors do not specify which, if any, “statutory environment agencies” actually responded to the consultation.

(4) In failing to identify the “developers and landowners” who supported the expansion of Chippenham, the authors evade the issue that these people and organisations stand to profit from such growth.

I can find no reference to a Consultation Management Strategy, nor to plans for disclosure of consultation materials. I can find no reference to an evidence handling strategy—for example, methods used to collate, classify, or cross-reference replies. I can find no reference to quality assurance mechanisms—for example, testing the validity and reliability of methods used; supervision of the people entering data; piloting data storage/retrieval methods.

I can find little account of detailed reasoning behind Council officers’ reviews of all the information submitted by respondents to the consultation, including that which officers evaluated as not relevant to their purposes. In fact, Council officers acknowledge that the updates provided are a preliminary step towards full analysis of responses to the consultation.

I can find no reference to how material relevant to the consultation will be retained—for example, in case future re-analysis is required.

I reiterate that Item 6 must be struck from the 29 June 2021 agenda. It must be reintroduced only when the full results of the Local Plan Review consultation have been in the public domain for sufficient time for Wiltshire residents to have read it.

Wiltshire Council

Cabinet

29 June 2021

Agenda Item 6 – Wiltshire Local Plan Review Update

Statement from Sylvia Wyatt

**To Councillor Nick Botterill Cabinet Member for Development
Management, Strategic Planning and Climate Change**

Statement

I am a resident of Great Bedwyn and responded at length to the consultation on the Wilts Local Plan in Jan- March 2021.

Very poor Process and engagement of residents of Wiltshire: I am astonished that I have not been sent the summary of review of the local Plan being now considered by the WCC. As someone who spent at nearly one day trying to understand the proposals (they were very technical, complicated and extensive) it is very surprising that I have not been sent this information. Instead, we are being given zero notice that comments on the local plan are being discussed . **Please can this item be postponed and a special meeting convened to consider it properly, given its huge importance.**

Comments on WCC summary of the local plan:

The summary of summaries does not mention the WCC's climate emergency resolution more does it relate the Wilts local plan to the developments being planned eg Westbury Incinerator (discussed at the planning committee yesterday)

The UK's Climate Change Committee has said the UK will fail to meet the Fifth and Sixth carbon budgets (our national carbon reduction targets) if it (including WCC) continue to pursue current policies, including national and local planning policies, which are currently targeting rural counties such as Wiltshire for climate damaging commuter extension housing. Wiltshire Council needs to play its part in protecting our future and must stop pursuing environmentally destructive and climate damaging policies that undermine national and local carbon reduction targets.

To achieve carbon footprint reduction, and stop climate change Wiltshire residents to significantly **change their behaviours**, the WCC needs to move quickly to support local organisations to help them work towards changing behaviours. This includes building zero carbon houses, encouraging Electric Car use, building up public transport to reduce commuter traffic and removing fossil fuel cars from roads.

Comments on specific points

Prior to the council election WCC (Cllr Clewer and others) stated that the additional 5,000 houses Wiltshire had voluntarily taken on, would be removed from Wiltshire's housing target and the Local Plan would be adapted in accordance with the significant consultation response which identified:

- That the local housing need (closer to 2,500 houses for the 2016-36 plan period according to ONS growth figures (**not** the 7500 houses proposed in the HI
- There are likely to be few new local employment opportunities (no new employment has resulted from the last phase of the plan)
- The housing targets completely ignore brownfield/ town centre regeneration opportunities.

Additional people living in Wiltshire, but commuting to work, bring **few benefits to local residents**, adds congestion, air pollution and strains on existing services, as well as destroying or degrading local amenities eg cycle path on railway lines, local river landscapes, open spaces and footpaths. And most serious of all, it contributes to damaging the lives of future generations by generating huge quantities of greenhouse gas emissions (from commuting) and destroying natural carbon sinks.

Actions for WCC to support reducing impact of Climate Change

1. The Government has pledged to meet net zero carbon by 2050, with a 78% reduction in emissions (on a 1990 baseline) by 2035. Wiltshire Council have declared a Climate Emergency and with the aim of reaching net zero by 2030 **so WCC needs to work to support this in every way possible.**
2. The Cabinet must confirm and operationalise that climate change must be an over-arching priority for this Council (and the Government and society) and **should test every decisions against the need to reduce carbon footprints .**
3. How can the Cabinet expect the public to engage in the way forward with these crucial issues without knowing what has been agreed? **The Local plan summaries and actions MUST be circulated and discussed in Parish Councils and Town Councils and WCC must listen to the responses.**
4. **Postpone discussion of the local plan by WCC and hold a special meeting about the Local Plan** with the normal amount of time and opportunity to comment and contribute to gain more support from local communities.
5. **Ensure that local residents in their communities (not developers) should have the major say in what happens in their own community** as they are trying to do by supporting the Neighbourhood Plans)?
6. Local business should need people who live in affordable housing which will help make small communities sustainable and enable people to work locally. **WCC should encourage local green businesses** to develop rather than destroying carbon sinks and creating huge car commuter extensions.
7. Ensure that steps are being taken to ensure that all housing, road and business developments in the next 5 years are **zero carbon or generate carbon savings and encourage biodiversity.**

Wiltshire Council

Cabinet

29 June 2021

Agenda Item 6 – Wiltshire Local Plan Review Update

Statement from Viv Talbot

**To Councillor Nick Botterill Cabinet Member for Development
Management, Strategic Planning and Climate Change**

Statement

The public has been given an astonishingly short period of time to make comments or questions regarding this crucial item on the Cabinet agenda. The summary of views does not reflect the depth of concern regarding proposals on new housing and road development and glosses over the urgency to prioritise reducing carbon emissions over a 'business as usual' scenario.

Wiltshire Council

Cabinet

29 June 2021

Agenda Item 6 – Wiltshire Local Plan Review Update

Questions from Karen Crawford

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

Question 1 – (21-208)

Has the council removed the 5000 excess houses from its housing target and removed the over allocation from it's structural plan?

Response:

No decisions are being made at this meeting on policies for the draft Plan. As set out in the report (paragraph 5), once the draft Plan has been prepared it will be brought back to Cabinet and onto Council for approval before a further stage of consultation is undertaken.

It is therefore too early to say what the housing requirement should be. Further work needs to be undertaken in response to the consultation on key parts of the evidence base including testing the upper and lower levels of housing need and spatial distribution of growth for the plan period.

Question 2 – (21-209)

Will the council insist on cycle paths being integral to all new housing and planning decisions? I understand that the new housing in Rudloe, just outside Corsham does not have a cycle path into town

Response:

The current Local Plan (Wiltshire Core Strategy) has policies promoting cycling which are considered in appraising planning applications currently. Accessibility by different

modes of travel, including bikes, will be considered when developing new plan proposals and policies.

Wiltshire Council

Cabinet

29 June 2021

Agenda Item 6 – Wiltshire Local Plan Review Update

Statement and Questions from Cllr Ernie Clark

**To Councillor Nick Botterill Cabinet Member for Development
Management, Strategic Planning and Climate Change**

Statement

Hilperton Parish Council unanimously rejected Wiltshire Council's draft 2036 Local Plan proposal for the Hilperton area. The reasons were a) excessive housing numbers and b) the proposed site allocation to the east of the existing village.

The proposed allocation brings no benefit to local residents. On the contrary, it will add congestion, air pollution, strain on existing services, and destroy open space and footpaths.

I believe that, prior to the May 21 election, it was stated that the additional 5,000 houses Wiltshire had voluntarily allocated, would be removed from Wiltshire's housing target and the Local Plan would be adapted. Removal of these 5,000 'voluntary' houses from the target would totally remove any need for the 2,000+ houses in Hilperton parish.

Question 1 – (21-210)

Can Wiltshire Council now confirm that the 5,000 'voluntary' houses have been removed from the Local Plan?

Response:

No decisions are being made at this meeting on policies for the draft Plan. As set out in the report (paragraph 5), once the draft Plan has been prepared it will be brought back to Cabinet and onto Council for approval before a further stage of consultation is undertaken.

It is therefore too early to say what the housing requirement should be. Further work needs to be undertaken in response to the consultation on key parts of the evidence base including testing the upper and lower levels of housing need and spatial distribution of growth for the plan period.

Question 2 – (21-211)

Is the Cabinet aware of Hilperton Parish Council's objection to the proposed housing numbers and site allocation for the parish?

Response:

Yes.

Wiltshire Council

Cabinet

29 June 2021

Agenda Item 6 – Wiltshire Local Plan Review Update

Statement and Questions from Cllr Nick Murry

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

Statement 1

Chippenham Town Council unanimously rejected the Local Plan's Spatial Strategy for Chippenham in terms of both its excessive housing numbers and its proposed site allocations to the East and South-East of Chippenham. It also rejected the HIF bid proposals for a feeder road and associated 7,500 houses several times, including unanimously confirming its opposition at its Annual Council meeting on 19th May 2021, as well as unanimously voting to write a letter of opposition to the HIF, to Wiltshire Council, Homes England and the Secretary of State for MHCLG, at its meeting on 17th June 2021.

Chippenham's MP Michelle Donelan stated in the press on 15th June 2021 that "I have not been given the assurances I sought regarding infrastructure and investment in the town" and "It is important that the interests of Chippenham's current residents are prioritised - yes we do need more affordable homes for families and young people to stay in the town but we certainly do not need 7500," concluding that "Now more than ever we all appreciate the beautiful countryside around our town and we must preserve it for future generations."

I do not intend to repeat all the evidence provided against the HIF during the consultation, which I assume will be available on Wiltshire Council's website, or to detail all the multiple Town Council resolutions rejecting the HIF and local plan proposals for Chippenham – I would simply ask Cabinet members to click and read the links below:

Town Council resolutions:

Full Council resolution with regard to Housing Infrastructure Funding and the Local Plan Review on 21st June 2021:

<https://www.chippenham.gov.uk/full-council-resolution-with-regard-to-housing-infrastructure-funding-and-the-local-plan-review>

Chippenham Town Council, Annual Council meeting on 19th May 2021:

<https://www.chippenham.gov.uk/wp-content/uploads/2021/06/Draft-Minutes-Full-Council-190521-1.pdf>

Extraordinary Council meeting on 4th March 2021:

<https://www.chippenham.gov.uk/wp-content/uploads/2021/03/Draft-Minutes-Extraordinary-Full-Council-040321.pdf>

<https://www.chippenham.gov.uk/chippenham-town-council-reject-all-options-presented-by-wiltshire-council-for-future-chippenham-consultation>

Extraordinary meeting of Full Council on 25th February 2021:

<https://www.chippenham.gov.uk/wp-content/uploads/2021/06/Draft-Minutes-Extraordinary-Full-Council-250221.pdf>

<https://www.chippenham.gov.uk/chippenham-town-council-say-no-to-proposed-new-housing-in-wiltshire-councils-local-plan-review-consultation>

Meeting of the Planning, Environment and Transport Committee, 18th February 2021

<https://www.chippenham.gov.uk/wp-content/uploads/2021/03/PET-Minutes-180221.pdf>

News articles:

Town Council letter to Wilts Council and Homes England (17th June):

<https://www.chippenham.gov.uk/wp-content/uploads/2021/06/Council-resolution-with-regard-to-Housing-Infrastructure-Funding-and-the-Local-Plan-Review-18.06.21.pdf>

<https://www.gazetteandherald.co.uk/news/19380121.chippenham-council-try-decline-75m-road-funding/>

Michelle Donelan to fight housing numbers in Chippenham (15th June):

<https://www.gazetteandherald.co.uk/news/19372607.michelle-donelan-fight-housing-numbers-chippenham/>

Chippenham MP says Wiltshire housing numbers must be reduced (3rd June):

<https://www.gazetteandherald.co.uk/news/19345839.chippenham-mp-says-wiltshire-housing-numbers-must-reduced/>

Town council votes to reject Future Chippenham scheme (8th March):

<https://www.gazetteandherald.co.uk/news/19143407.town-council-votes-reject-future-chippenham-scheme/>

Chippenham Town Council reject all options presented by Wiltshire Council for Future Chippenham consultation (4th March)

<https://www.chippenham.gov.uk/chippenham-town-council-reject-all-options-presented-by-wiltshire-council-for-future-chippenham-consultation>

Chippenham Town Council say no to proposed new housing in Wiltshire Council's Local Plan Review Consultation (26th Feb):

<https://www.chippenham.gov.uk/chippenham-town-council-say-no-to-proposed-new-housing-in-wiltshire-councils-local-plan-review-consultation>

Chippenham councillors unanimously voted to reject the local plan for the town (26th Feb):

<https://www.gazetteandherald.co.uk/news/19120550.chippenham-unanimously-votes-reject-wiltshire-local-plan/>

Calne Town Council objects to Future Chippenham scheme (25th Feb):

<https://www.gazetteandherald.co.uk/news/19118103.calne-town-council-objects-future-chippenham-scheme/>

Prior to the election Cllr Clewer and others stated that the additional 5,000 houses Wiltshire had voluntarily taken on, would be removed from Wiltshire's housing target and the Local Plan would be adapted in accordance with the significant consultation response. Taking 5,000 houses off the target means a significant reduction for Chippenham (even if some houses are withdrawn elsewhere) and would completely remove the need for the HIF bid, which is conditional on 7,500 houses.

The scale of the HIF bid proposed development (which was used to predetermine the Local Plan Review Spatial Strategy numbers and location for Chippenham) bears no relation to local housing need (which is closer to 2,500 houses for the 2016-36 plan period according to ONS growth figures) or to employment opportunities (no new employment has resulted from the last phase of the plan) and completely ignores brownfield/ town centre regeneration opportunities. It brings no benefits to local residents and adds congestion, air pollution and strains on existing services, as well as destroying or degrading local amenities such as the Old Railway line Cycle Path and local river

landscapes, open spaces and footpaths. And most serious of all, it contributes to damaging the lives of future generations by generating huge quantities of greenhouse gas emissions (from commuting) and destroying natural carbon sinks.

The Government has pledged to meet net zero carbon by 2050, with a 78% reduction in emissions (on a 1990 baseline) by 2035. Wiltshire Council and Chippenham Town council have both declared a Climate Emergency and with the aim of reaching net zero by 2030. The UK's Climate Change Committee has said the UK will fail to meet the Fifth and Sixth carbon budgets (our national carbon reduction targets) if it continues to pursue current policies, including national and local planning policies, which are currently targeting rural counties such as Wiltshire for climate damaging commuter extensions. Wiltshire Council needs to play its part in protecting our future and must stop pursuing environmentally destructive and climate damaging policies that undermine national and local carbon reduction targets.

Question 1 – (21-212)

Will Cllr Clewer now confirm that the 5,000 additional houses have been formally removed from Wiltshire's housing target?

Response:

No decisions are being made at this meeting on policies for the draft Plan. As set out in the report (paragraph 5), once the draft Plan has been prepared it will be brought back to Cabinet and onto Council for approval before a further stage of consultation is undertaken.

It is too early to say what the housing requirement should be. Further work needs to be undertaken in response to the consultation on key parts of the evidence base including testing the upper and lower levels of housing need and spatial distribution of growth for the plan period.

Question 2 – (21-213)

Is the Cabinet aware of Chippenham Town Council's outright objection to the HIF bid and proposed housing numbers and site allocations for Chippenham? (see links to resolutions in statement)

Response:

The recent resolution of the Town Council is a matter of public record.

Question 3 – (21-214)

Is the Cabinet aware of Chippenham MP's withdrawal of her support for the HIF bid and her objections stated in the Wiltshire press last week? (see links to press articles above)

Response:

Recent correspondence with Michelle Donelan MP is available on the Chippenham

Futures website [Wiltshire Council responds to a letter from Michelle Donelan MP regarding Future Chippenham - Wiltshire Council](#) It is understood that The MP's support of the Future Chippenham programme has not been withdrawn and is dependent on the council delivering specific outcomes for Chippenham and its residents.

Question 4 – (21-215)

Will Cllr Clewer now publish the agreement with Homes England, as originally promised by Cllr Whitehead. If not, why not?

Response:

Following questions about the publication of the GDA HIF Agreement advice was sought from Homes England. Their advice is that the GDA should not be published.

Question 5 – (21-216)

How can the Cabinet expect the public to engage on a way forward with these crucial issues without knowing what has been agreed?

Response:

The Council is committed to providing information on the Future Chippenham programme so people can make informed comments. However, the Council will not publish information that is commercially sensitive and would be prejudicial to its current interests

Question 6 – (21-217)

Will the Cabinet share with its electors and local MPs, a commitment to understanding the consultation responses (which were overwhelmingly opposed to the HIF bid proposals and Local Plan spatial strategy for Chippenham) and how the lessons will be built into the Local Plan Review?

Response:

All representations received on the Local Plan will be given due consideration as the preparation of the draft Plan is progressed.

Question 7 – (21-218)

Has the Future Chippenham team now been dissolved? If not why not?

Response:

No. The team will continue to progress the Future Chippenham programme in line with direction from Cabinet.

Question 8 – (21-219)

If not, how does Future Chippenham relate to the Council's plans to sign up to a Joint Venture Partnership?

Response:

A report on Future Chippenham is being taken to Wiltshire Council's Cabinet in July.

Question 9 – (21-220)

Who exactly will be part of this JV partnership and what is its purpose/ objectives?

Response:

This is not known at this stage and is subject to on-going independent advice and a procurement process in due course.

Question 10 – (21-221)

Will Cllr Clewer confirm or deny that the proposed Joint Venture Partners could be comprised of developers with financial interests in future development in or around Chippenham?

Response:

The parties to the Joint Venture (with the Council) will be selected by an appropriate procurement process, it is not possible to say at this point the identity of parties that may choose to express an interest.

Question 11 – (21-222)

How can developers, driven by vested interests and profit, be allowed to influence plans for the future of Chippenham (including the Local Plan)?

Response:

Developers have a right to comment on Local Plans like anyone else. This is recognised in the Council's adopted Statement of Community Involvement that defines 'Our Community' as meaning "*residents, businesses, community and interest groups, town and parish councils, developers, adjoining local authorities...*". However, this does not mean they have any undue influence over and above any other stakeholders.

If a joint venture partnership is developed to bring forward development it will be on land allocated via the Local plan review post that review. Any development proposals will be subject to the statutory planning process.

Question 12 – (21-223)

Shouldn't Chippenham's residents (not developers) have the major say in what happens in their town (as they are trying to do by supporting the Neighbourhood Plan)?

Response:

See response to Question 11.

Question 13 – (21-224)

What steps are being taken to avoid corrupt practice in the JVP arrangement, given the obvious opportunities for insider trading and private deals between the JVP and the Council?

Response:

The parties to the Joint Venture (with the Council) will be selected by an appropriate procurement process

Question 14 – (21-225)

Does the Cabinet agree that climate change must be an over-arching priority for this Council (and the Government and society) and if so, that destroying carbon sinks and creating huge commuter extensions is not a viable proposition?

Response:

The points you raise have been made through the consultation alongside many others and will be given due consideration as the Local Plan is progressed.

As set out in the report, the Council is mindful of its legal duty to prepare a Local Plan that contributes to the mitigation of, and adaptation to, climate change.

Question 15 – (21-226)

Will the Cabinet acknowledge that the HIF bid is dead and start engaging with local councils and their local communities on a new way forward, that's fit for the future?

Response:

A report on Future Chippenham is being taken to Wiltshire Council's Cabinet in July.

Statement 2:

1. It was not known in advance that the Local Plan Review would be on this agenda and is completely unfair to put such an important item on the agenda mere hours before the deadline for public questions that will receive an answer expires (noon today).
2. The report is not only incomplete but the methodology is highly suspect in presenting the views of (a few) developers alongside those of Town and Parish Councils, the public and their elected representatives (all lumped together), as though they were somehow equivalent. The Spatial Strategy for Wiltshire should be determined by the people of Wiltshire not by developers, whose sole interest is financial gain. The development industry should not determine or have any major influence on the Spatial Strategy and the number of houses and their locations within our County. Comments from developers such as “Support for Chippenham as focus for growth,” and “Developers of land within preferred sites generally supportive,” and “There is too much emphasis upon brownfield land” which support their vested financial interests, should carry no weight in determining the Spatial Strategy, and relative to the overwhelming opposing views to these comments from towns, parishes and the public to prioritise brownfield sites. How are comments given by a single developer in relation to promoting their site comparable to unanimously supported Chippenham Town Council (representing c. 45k residents) representations in the opposite direction? Where is the appropriate weighting being applied? Is Wiltshire Council representing the interests of the development industry or its residents?
3. Cabinet needs to take account of the fact that, in spite of developer opinions, there is no local support for the HIF bid, distributor road and associated 7,500 houses. This should be one of the key conclusions of this summary report, which should have led to a proposal the Agreement with Homes England be urgently reviewed with a view to dissolving. It is important to point out that a key criterion for the HIF bid was local support, and that there is a complete lack of any local support (from residents, Town Council or Chippenham’s MP). Anything other than a withdrawal from this agreement would be supporting developer vested interests over Wiltshire’s residents’, and given the associated climate damage, Chippenham’s and the County’s future residents’, interests.
4. Cabinet also needs to take account of the fact that there is no local support for the Local Plan proposals for Chippenham, and refer to Chippenham Town Council’s consultation response, which states that:
 - i. “The housing target allocated to Chippenham is much too high, bears no relation to Chippenham’s actual housing needs and is predicated on substantial numbers of people relocating here, in order to commute back out, causing more congestion and significant damage to the climate;
 - ii. The proposals to develop large suburbs to the East (Site 1) and South (Site 2) would have a severe adverse impact on the town and cause unacceptable damage to the local environment through the destruction of high-quality farmland and wildlife habitat in the Avon and Marden Valley;
 - iii. The Chippenham housing numbers and their location should not be dictated by a grant application for a road, which did not undergo any public consultation, and which serves to predetermine the spatial strategy; and

iv. Wiltshire Council needs to develop an alternative Spatial Strategy, which is employment led, “appropriate in scale” and “environmentally sustainable” as stated in the Vision for the Chippenham Neighbourhood Plan.”

This was reconfirmed by the new Council (post May 2021 elections) via a resolution objecting to the HIF and associated housing proposals and by a letter sent to the Chief Executive of Wiltshire Council on 18th June 2021, stating that:

“Chippenham Town Council wholly opposes the construction of such a road and the use of HIF funding for highway infrastructure, to the east and south of Chippenham; disagrees with the proposals for 7,500 houses in the Avon and Marden Valley area defined by the proposed road routes that would be part funded by the HIF; and requests that the £75m funding for this road is withdrawn on the basis that there is overwhelming opposition from residents and local town/parish councils, including Chippenham and Calne, for this carbon intensive and environmentally damaging scheme.”

The proposal (ii) under item 6 needs to acknowledge this and other Town and Parish Council objections to the Spatial Strategy by adding that further development of the Local Plan *will take account of the democratic will and clearly expressed views of Wiltshire’s residents.* Perhaps one of the Cabinet members could propose this amendment.

Question 16 – (21-227)

Does the Cabinet agree that the Spatial Strategy for Wiltshire should be determined in the best interests of the residents of Wiltshire, including taking account of the need to minimise carbon emissions, and not by developers?

Response:

See response to Q11.

In developing any plan, the interests of the local community are key considerations.

Question 17 – (21-228)

For what reason has this incomplete report been brought to this Cabinet meeting, rather than completing its analysis and sharing with the public in advance?

Response:

The report is in response to a resolution of Cabinet on 1 December to receive a report on the main issues raised. Paragraphs 9 and 10 explain why only an initial summary has been provided. There is a need to press ahead with the preparation of the Local Plan and it was not felt necessary to delay the reporting to Cabinet.

The consultation report when completed will be a factual summary of the responses received. There is no need to allow people to comment on the outputs of a consultation through a committee process.

No decisions are being made at this meeting on policies for the draft Plan. As set out in the report (paragraph 5), once the draft Plan has been prepared it will be brought back to Cabinet and onto Council for approval before a further stage of consultation is undertaken.

Wiltshire Council

Cabinet

29 June 2021

Agenda Item 5 – Future Chippenham / HIF

Statement and Questions from Cllr Clare Cape

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

Statement

Chippenham Town Council emphatically and overwhelmingly rejected the Future Chippenham (HIF) distributor road; and the proposals in the Local Plan for a suburb of 7,500 homes to the south and east of Chippenham in February and March this year. In May, members of the new Chippenham Town Council voted unanimously to re-affirm the previous Council's position.

The recent Chesham and Amersham by-election, historically a safe Conservative seat, was won by the Liberal Democrats, at least in part due to this government's inappropriate desire for excessive development of the countryside. This was as clear on the Buckinghamshire doorsteps as it was reported in the media; and closely mirrors what we've heard in locally. Concreting over the countryside; continuously do-nutting our market towns and destroying our natural capital and farmland to accommodate commuters is not what local people want. Even Chippenham's MP now seems to be of the opinion that 7,500 houses is excessive; and that Chippenham's residents must be listened to.

Just yesterday (Tuesday 22 June) the media were reporting that the Welsh government are stopping road building because of the need to mitigate the climate crisis.

Question 1 (21-229)

Is my understanding correct that the Leader and Cabinet have agreed to remove the excess 5,000 houses from the Local Plan which would then reduce the number required for Chippenham and hence the justification for the HIF bid for a distributor road to serve those houses?

Response:

No decisions are being made at this meeting on policies for the draft Plan. As set out in the report (paragraph 5), once the draft Plan has been prepared it will be brought back to Cabinet and onto Council for approval before a further stage of consultation is undertaken.

It is too early to say what the housing requirement should be. Further work needs to be undertaken in response to the consultation on key parts of the evidence base including

testing the upper and lower levels of housing need and spatial distribution of growth for the plan period.

A report on Future Chippenham is being brought to Cabinet in July.

Question 2 (21-230)

Would the Leader, Cabinet member and officers kindly provide to an update to Cabinet regarding their intentions regarding the following?

- a) To re-work the Local Plan proposals for Wiltshire **as a whole**, based on a **revised and evidenced number** of homes - particularly **affordable homes**; and with **alternative options included** for example prioritised use of brownfield sites; a garden village; a different spread of development; and smaller developments.
- b) To undertake traffic flow studies to inform options for a **very significantly less damaging solution to traffic problems** in Chippenham.

Further, in addressing a) and b), to undertake:

- c) To take into account the **climate and ecological emergencies**
- d) To reflect **post-pandemic changes** to the way our residents live, work, do business, travel and spend their leisure time
- e) To take on board the **strength of feeling amongst local residents** who are against the HIF and associated huge development; and also those who recognise the need for housing of appropriate type, in appropriate locations; and who want to find a way to solve traffic problems in Chippenham.
- f) To **fully involve local elected members** of all political persuasions, from both Chippenham itself and the neighbouring affected Parishes in finding a way forward.

Response:

The points raised about Local Plan proposals have been made through the consultation, alongside many others, and will be given due consideration as the Local Plan is progressed.

See response to Question 1 also.

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Wiltshire Council

Cabinet

29 June 2021

Agenda Item 6 – Wiltshire Local Plan Review Update

Question from Cllr Alex Kay – Bradford on Avon Town Council

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

Statement

I would like to reinforce the position held by Bradford on Avon Town Council concerning the content and quality of the draft of the Wiltshire Council Local Plan as can be found on our website.

<https://bradfordonavontowncouncil.gov.uk/local-plan-rejected-by-full-council/>

I am astounded that no direct notice of this 29th June meeting came to me or others, and that we have had less than 24 hours' notice to consider the extensive summary documentation.

Question 1 (21-240)

Will Cllr Clewer now confirm that the 5,000 additional houses have been formally removed from Wiltshire's housing target?

Response:

Question 2 (21-241)

Is the Cabinet aware of Bradford on Avon Town Council's outright objection to all three greenfield sites suggested for development in Bradford on Avon?

Response:

Question 3 (21-242)

Does the Cabinet agree that climate change must be an over-arching priority for this Council (and the Government and society) and if so, that destroying carbon sinks and creating large housing estates on greenfield sites is not a viable proposition? How will

Cllr Clewer square the circle with pressure from developers and his committed role in the Wiltshire Council Climate strategy?

Response:

Question 4 (21-243)

Why has the Blue-Green Strategy consultation been delayed and why was it not integrated with the Local Plan? Why is it only a strategy and not a policy document?

Response:

Question 5 (21-244)

Shouldn't our residents (not developers) have the major say in what happens in their community (as many towns and parishes are attempting with their Neighbourhood Plan)?

Response:

Question 6 (21-245)

What measures are Wiltshire Council taking to support the Neighbourhood Planning process in the light of the significant evidence of strong commitment that has been made by residents across Wiltshire to their Neighbourhood Plan and Local Planning

Response:

Question 7 (21-246)

How can the Cabinet expect the public to engage on a way forward with these crucial issues without knowing what has been agreed?

Response:

Question 8 (21-247)

Why are developers, driven by vested interests and profit, allowed to influence plans across Wiltshire? They should provide affordable housing as an imperative and a significant proportion of any number of houses agreed, and not make it a condition for raising the maximum number of houses calculated and proven very unpopular across

Bradford on Avon and even more so, from our neighbours across Wiltshire such as Chippenham, Melksham, Trowbridge.

Response:

Question 9 (21-248)

Will the Cabinet commit to pressure developers to provide sustainable carbon-zero homes including suitable energy-making and water-saving measures?

Response:

Question 10 (21-249)

The volume of housing across the County is not commensurate with the infrastructure, particularly traffic, health and education. The volume of through traffic in Bradford in Avon is already unbearable now, as we come out of lock down and the recent start-up of the Bath CAZ. The additional housing in neighbouring towns will bring the entire road system to a standstill. Will Wiltshire Council commit to work with BOATC to reduce the through traffic and improve air quality and pedestrian safety in the town as a matter of urgency?

Response:

Wiltshire Council

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29 June 2021

Agenda Item 6 – Wiltshire Local Plan Review Update

Question from Dave Knight

**To Councillor Nick Botterill Cabinet Member for Development
Management, Strategic Planning and Climate Change**

Question 1 (21-250)

In light of the recent planning decision to allow the Westbury incinerator to go ahead even when this will work against Wiltshire Council's climate commitments and national legislation to reduce CO₂e emissions by 68% by 2030, how will the Local Plan policies be reviewed to check and confirm they are aligned to the objective to work towards getting the county to Net Zero asap (and the council to Net Zero by 2030)?

Response:

Wiltshire Council

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29 June 2021

Agenda Item 6 – Wiltshire Local Plan Review Update

Question from Janet Giles

**To Councillor Nick Botterill Cabinet Member for Development
Management, Strategic Planning and Climate Change**

Statement

The preferred route for a potential A350 bypass has been selected and will be subject to minor amendments to the north before being defined and put forward as the OBC for funding. Whether or not funding is granted and then whether or not the road is progressed could the route be granted protected planning status to prevent any development along the route which would preclude it as a bypass route at some future date. When we have more development in Melksham and may require a road, this may coincide with finally having funds but may be 10/15 years down the line and it would be disaster if we then had no option but build a longer bypass on even more open countryside.

Question 1 (21-251)

Can protection be incorporated into the local plan now?

Response

Wiltshire Council

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29 June 2021

Agenda Item 6 – Wiltshire Local Plan Review Update

Statement from Marilyn Longden

**To Councillor Nick Botterill Cabinet Member for Development
Management, Strategic Planning and Climate Change**

Statement

Having just read this document I would like to reiterate my concerns that environmental and well being issues must not be overlooked.

The old golf course here in Bradford on Avon is a much needed green space and adjoins neighbouring green spaces making a wonderful green corridor for residents to enjoy nature. The other documented issues relating to the use of this site for housing are extremely concerning.

The need for an infrastructure to support green energy and greater consideration of environmental impact is crucial with so much evidence of the negative impact of current provisions.

I welcome further research based on the findings which should include consultation with local (town etc) councils and residents. Please can Wiltshire Council ensure that ALL residents are made aware of consultations.

I would query the statement that:

"Arrangements were also put in place to allow people who did not have access to the internet to have hard copies sent to them by post." Maybe there were arrangements but there was no publicity.

There was nothing visible locally to notify residents of the proposals. The majority of my neighbours are elderly and don't use social media or ICT. They were severely disadvantaged and were only made aware of the plans when we talked to them. Unfortunately many older people were not informed at all.

I hope the genuine and valid concerns of residents will be taken into account.

Wiltshire Council

Cabinet

29 June 2021

Agenda Item 6 – Wiltshire Local Plan Review Update

Statement from Nick Wilkinson

**To Councillor Nick Botterill Cabinet Member for Development
Management, Strategic Planning and Climate Change**

Statement

1. Appendix 1 attached to your Agenda contains much publicly useful information. It is of great concern that you have now given your Public so little time to reflect and comment.
2. As far as residents of rural large villages (such as Great Bedwyn) are concerned, the Appendix covers us as though 'one-size-fits-all', whereas in reality some villages have major special interests.
3. The median household employed income in this part of Wiltshire is according to your own statistics about £34,000 a year; there are a few significantly wealthier residents, which means, as our recent NDP surveys confirmed, that there are many local families with much lower incomes.
4. The effect of the current pandemic has been that many people living in London and other cities such as Reading want to move to more rural areas, either to work from home or to be able to travel easily and occasionally to their employer's offices.
5. Bedwyn is not only at the centre of an Area of Outstanding Natural Beauty, but unusually for a village also has a railway station and close motorway access which enable travel to major work and population centres. This makes it highly attractive to families from elsewhere who are on generally higher than local median salaries.
6. Bedwyn was also already an expensive housing area for the reasons in 5, because it also has relatively limited housing, despite the regular building of small and medium estates since the 1950s.
7. So, for both reasons market house prices have risen very fast in recent months to a general level at which even those local families on median incomes can no longer consider buying or renting in the area. For example, at the largest local employer, Great Bedwyn Primary School, most of the teaching and educational support staff now have daily to drive significant distances from elsewhere. The same goes for others in support and service jobs.
8. The situation is made worse by the declining numbers and standard of local social housing (about 20% of local homes), because the principal Housing Associations are for business reasons selling on the market when residents die or move out,

and then concentrating any new builds in areas where land and support is cheaper. So even accommodation to rent is becoming much scarcer and less affordable.

9. When NDP work was started locally in recent years, our emphasis was on retaining a balanced community, maintaining the overall AONB environment, and reducing the need to travel to work. The prior Village Design Statement also required development standards which reduced heat loss and increased the use of natural energy sources.
10. We have a suitable potential medium-sized development site for a mix of market and social homes, in an available church-owned field along one side of the current GB Village settlement, bordering the Primary School and an existing estate, and within walking distance of our remaining local services centre and the railway station. There is predominantly supportive local desire for additional 'affordable' market and social housing here.
11. So please produce a Wiltshire Local Plan that includes supporting specific local community needs like ours.
12. And above all please accept, recognise and support that the limited actual financial wealth of some existing Wiltshire **local families and communities** requires at least equal balancing in development and conservation planning, with other more general environmental, business and political considerations.

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29 June 2021

Agenda Item 6 – Wiltshire Local Plan Review Update

Statement from Shirley McCarthy – Wiltshire Climate Alliance

**To Councillor Nick Botterill Cabinet Member for Development
Management, Strategic Planning and Climate Change**

Statement

Although I was alerted by Councillor Murry yesterday to the possibility of putting a question to Cabinet, the shortness of the timescale precluded my doing so by the deadline of noon today. I therefore hope that my points will be taken into account despite their arriving after the deadline.

The arguments against the Local Plan Review proposals, particularly as they affect the Chippenham Housing Market Area, have been reiterated by Cllr Murry and I have already commented as part of the consultation, so my focus is why Wiltshire Council is risking a failure in democratic accountability?

- a) the lack of notice that the Cabinet were to consider the LPR on 29/6
- b) recommending progression to the next stage before Councillors have seen a full digest of the massive response to the consultation
- c) giving equal weight to developer and resident input in the summary of responses
- d) omitting reference to critical comments on the way the consultation was carried out
- d) once again, assuring simply that the Global Warming and Climate Emergency Task Group will have its findings "taken into account" instead of making them central to producing the Local Plan.

Wiltshire Council

Cabinet

29 June 2021

Agenda Item 6 – Wiltshire Local Plan Review Update

Question from Cllr Derek Walters

**To Councillor Nick Botterill Cabinet Member for Development
Management, Strategic Planning and Climate Change**

Question 1 (21-252)

In 2018 Dominic Raab announced changes to the New Towns Act that would see local authorities leading new town developments that would be accountable to their local communities, rather than government ministers.

Does Cabinet think that this would help deliver new housing in communities designed to satisfy the low carbon commitments of our Climate Emergency pledge and thus consigning the HIF, a vote loser and an outdated solution, to Room 101.

Response:

Environment_Select_Committee_FWP(July-2021)

Last Updated 6 July 2021

Details	Start date	Final report expected
Global Warming and Climate Emergency Task Group	May 2019	tbc

Environment_Select_Committee_FWP(July-2021)			Last updated 6 July 2021		
Meeting Date	Item	Details / Purpose of Report	Associate Director	Responsible Cabinet Member	Report Author / Lead Officer
14 Sept 2021	CATGs: 10 Years On	As discussed at 24 October 2019 ESC-Executive meeting on the 'highways and transport' portfolio, a report to be provided detailing the benefit that CATGs have brought to Wiltshire's communities, following the now 10 years plus since they were first implemented.	Parvis Khansari	Cllr Dr Mark McClelland	Dave Thomas
14 Sept 2021	'A Better Deal for Bus Users'	Following the Briefing Note circulated on 26 February 2020 on the Government's funding for 'a better deal for bus users', the committee will be updated on the outcomes of a further consultation process with members, town and parish council asking how Wiltshire should spend the £671,171 allocated to Wiltshire for improving bus services.	Jessica Gibbons (Director - Neighbourhood and Community Services)	Cllr Dr Mark McClelland	Jason Salter