

From: [Parish Clerk](#)
To: [Clampitt-dix, Georgina](#)
Cc: [Spatial Planning Policy](#)
Subject: Re. Cabinet Meeting on 15th May / Crudwell Neighbourhood Plan *REF: 1 - printed*
Date: 27 May 2018 10:42:23
Attachments: [Spatial Planning.pdf](#)

Dear Ms Clampitt-Dix,

Crudwell Parish Council has as a matter of urgency compiled the attached response following the Cabinet Meeting held on 15th May 2018. We feel the emerging neighbourhood plan should allow our community, both those that live and work in Crudwell Parish, to have their views heard and taken into account with regards to Wiltshire Site Allocation Plan and we respectfully request your response to the items raised.

This letter has also been posted to you and e-mailed and posted to Baroness Scott and Cllrs Sturgis and Berry.

We also note receipt of the a Briefing Note on the Draft Wiltshire Housing Site Allocations Plan and will respond to this in due course.

Yours

Lisa Dent
Clerk - Crudwell Parish Council

Crudwell Parish Council
76 Dyer St
Cirencester
Gloucs
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Georgina Clampitt-Dix
Head of Spatial Planning
Economic Development and Planning
Wiltshire Council
County Hall
Trowbridge
BA14 8JD

24th May 2018

Dear Ms Clampitt-Dix

Re: Cabinet Meeting on 15th May / Crudwell Neighbourhood Plan

We regret that no member of Crudwell Parish Council or Neighbourhood Plan (NP) Steering Group was able to attend the Cabinet Meeting on 15th May, during which the draft Wiltshire Site Allocations Plan was extensively discussed. We would have welcomed the opportunity to make representations to Cabinet and to provide an update on progress with Crudwell's Neighbourhood Plan. Unfortunately, we were only made aware of the meeting the previous evening and, at that late stage, nobody was available. We note with interest that representatives from the Market Lavington NP Steering Group and North Bradley Parish Council were present to comment on progress with their Neighbourhood Plans.

However, we have viewed the webcast of the Cabinet meeting and wish to raise a number of points. With regard to the issue of timing, we are pleased that the decision has been taken to defer endorsement of the draft Site Allocations Plan and its subsequent submission to the Secretary of State for examination. This will provide a window to enable consideration of potential changes arising from representations by Ward Members and town and parish councils.

It was clear from the Cabinet Meeting that Cllr. Scott is concerned that the Site Allocations Plan may be over-riding the "localism" agenda in some cases. For this reason, she recommended, and Cabinet resolved, that officers should work with Market Lavington and North Bradley to give them every opportunity to reach regulation 16 before the Site Allocations Plan goes to examination. We are assuming that deferment of Cabinet's endorsement of the Site Allocations Plan is likely to result in it reaching examination in early 2019, taking account also of the Christmas / New Year break.

Whilst we were encouraged by this resolution, we were extremely disappointed that the Crudwell NP process was referred to dismissively by Cllr. Sturgis. We would submit that the Crudwell NP is at roughly the same stage of development as North Bradley's and therefore should be treated in the same way. We would expect a similar level of support to be offered to Crudwell to help us to reach regulation 16 by the examination date.

Progress that has been made with Crudwell's NP to date is as follows:

- Initial community engagement survey undertaken
- Over 300 parishioners on our mailing list
- Housing Needs Assessment completed
- Call for Sites undertaken, resulting in 11 sites identified
- Consultations with infrastructure providers ongoing
- General Meeting open to all parishioners and interested parties held (attendance: about 80)
- Focus Groups set up to make recommendations on policies and site / housing allocations
- Joint Focus Groups Exhibition and consultations with parishioners held (attendance: about 70)
- Focus Groups' recommendations due to be submitted to Steering Group 1st week in June, to include housing site allocation(s)
- Regulation 14 document to be released for consultation in Autumn 2018
- Regulation 16 submission in early 2019
- Please visit our website for more information on our progress <http://www.my-crudwell.org/plan/>

On that basis, there is likely to be very little time between our Neighbourhood Plan reaching regulation 16 and the examination of your Site Allocation Plan. This makes it even more pressing that we should be provided with every assistance to reach regulation 16 as early as possible, as advocated by Cllr. Scott.

It is noteworthy that our fundamental case with regard to the Housing Site Allocations Plan is very similar to that expressed by Cllr. Gamble at the Cabinet Meeting, i.e. that there is no strategic need for the Housing Site Allocations Plan to allocate any sites in Crudwell because there is already sufficient housing identified in both the North and West Wiltshire Housing Market Area and the Malmesbury Community Area. On that basis, any allocations in Crudwell should be made to meet local housing needs and this is precisely what the Crudwell NP aims to deliver. We have found no evidence explaining why officers feel that this view, and therefore the Government's "localism" agenda, should be disregarded.

We wholeheartedly support the "localism" agenda and understand the need for communities to provide homes to meet local needs. What we are asking is that Crudwell should be given the same opportunity as others to help shape the future of its community by being in a position to deliver a Neighbourhood Plan that truly reflects local needs and expectations.

We are very conscious that decisions made now will have long-term implications for the future of our community. Therefore, we believe that it is both prudent and appropriate that the views of those who live and work within the parish of Crudwell should be taken into account in the policies formulated in the Wiltshire Site Allocations Plan.

This letter has also been sent to Cllr Baroness Scott at Wiltshire Council and copied to Cllr Sturgis and Cllr Berry.

Yours sincerely,



Peter Gilchrist – Chairman, Crudwell Parish Council

Mike Credicott – Crudwell Parish Council, Neighbourhood Plan Lead

From: [Lisa Dent](#)
To: [Sturgis, Toby](#)
Cc: [Tucker, Paula](#); [Clampitt-dix, Georgina](#); [Spatial Planning Policy](#); [Scott, Jane](#); [Henry, Darren](#); [Berry, Chuck](#)
Subject: Crudwell Parish Council - Response to Briefing Note / following cabinet Meeting 15.05.18 *REF: 1a - printed*
Date: 10 June 2018 16:37:26
Attachments: [18.06.08 Response to Briefing Note.pdf](#)

Dear Cllr Sturgis,

Crudwell Parish Council is pleased to submit the attached response to the Briefing Note which followed the Cabinet Meeting held on 15th May 2018.

This report was written based on the housing supply situation as at the May Cabinet meeting. At that date, there was no strategic need to identify any housing sites in Crudwell because there was sufficient housing supply in the Housing Market Area and the Malmesbury Community Area already. Since then, we understand that another 48 new dwellings (net) have been approved in the Malmesbury Community Area, at the Cotswold Community. This means that the housing supply situation is even more favourable, so there is even less strategic need for the Housing Site Allocations Plan to allocate any housing sites at Crudwell.

Wiltshire Council's own documentation emphasises the importance of leaving neighbourhood plans to identify the level of local housing need and to determine the best location to meet that need. This recent planning decision only increases the strength of our argument that the Crudwell Neighbourhood Plan should be left to do just that.

Yours

Lisa Dent

Clerk - Crudwell Parish Council



Wiltshire Housing Site Allocations Plan Response to Briefing Note 355 on behalf of Crudwell Parish Council

June 2018

Project Reference: 00001



Wiltshire Housing Site Allocations Plan

Response to Briefing Note 355 on behalf of Crudwell Parish Council

Document Issue Record

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Produced by:	Stuart Miles BEng MA MRTPI	Stuart Miles BEng MA MRTPI	

June 2018

Project Reference: 00001

1 Introduction

- 1.1 Vision Planning is instructed by Crudwell Parish Council to respond to Briefing Note 355, which followed the Cabinet's deferral of a decision to endorse the Wiltshire Site Allocations Plan for submission on 15th May 2018.
- 1.2 Crudwell Parish Council continues to object to Wiltshire Council's proposed allocation of the Ridgeway Farm site (H2.13) in the context of the good work, rapid progress and strong public support for the emerging Crudwell Neighbourhood Plan.
- 1.3 Our fundamental point remains that the housing land supply position is such that there is no strategic need for Wiltshire Council to allocate any sites at any large villages in the Malmesbury Community Area, and no direct response to this point has been provided in the papers presented to Cabinet in May.
- 1.4 We welcome the Cabinet's support for the Localism agenda, and ask to be given the time to produce our own Neighbourhood Plan.

2 Proposed Housing Site Allocations Plan

2.1 The proposed Submission Draft Housing Site Allocations Plan presented to Cabinet in May 2018 continues to propose the allocation of the Ridgeway Farm site (Site H2.13) for 50 dwellings, including the 10 recently built on the site's frontage.

2.2 The justification for the choice of this site, given in paragraph 5.112 of the Site Allocations Plan itself, include:

"It is in a location that has the capacity to accommodate change from an environmental and landscape perspective."

"It would provide wider benefits for the local community by scope to provide for affordable housing and by supporting the expansion of the local primary school."

"The school is currently full but expansion could be possible through funding contributions toward additional capacity to cater for pupils arising from development. This would remove a particular constraint to the long term prospects of the village and support its role in the spatial strategy."

2.3 Proposed mitigation, set out in paragraphs 5.113 and 5.114 include:

"Additional screening at the site boundaries would be required to preserve and maintain the landscape's quality, particularly on the northern and eastern boundaries. This would retain views of a wooded framework in longer distance views and minimise the visibility of the development in the wider landscape."

"Development along Tetbury Lane should be sensitively designed to ensure it integrates with the existing semi-rural frontage and supports the distinctiveness of the village."

"Access will be from Tetbury Lane and will require highway improvement works to the junction of Tetbury Lane/ A429 and improvements for pedestrians along Tetbury Lane and, elsewhere where feasible, in order to improve accessibility to the centre of the village."

"An extension of public footpath CRUD9 would be required, to the west of the Dawneys, linking with Tetbury Lane to allow for wider improvements to be delivered in relation to the local public rights of way network."

2.4 Since the June 2017 draft of the Housing Site Allocations Plan was released, an additional omission site has come forward in Crudwell, at Tuners Lane, and been considered through the Housing Site Allocations process.

2.5 This site is not proposed for allocation for the following reasons, described in the “Community Area Topic Paper – Malmesbury”:

“It is considered that the site appears reasonably well-located to village services however there is uncertainty that the carriageway is suitable for increased numbers of vehicles and that comprehensive and attractive routes for pedestrians and cyclists are deliverable. There are also potential issues with respect to heritage and proximity to the conservation area.”

2.6 Topic Paper 2: Site Selection Process Methodology (Minor factual update) continues to emphasise, at paragraph 3.8, that:

*“It is only necessary for this Plan to allocate land for housing development where it is a strategic priority to do so. WCS Core Policy 1 proposes that development at Large Villages should be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities. **Unless there is a strategic priority to deliver the homes needed in an HMA, then the most appropriate means to assess local needs and plan growth at each Large Village is through the neighbourhood planning process.**”* (My emphasis)

3 Strategic Priority for Wiltshire to allocate housing sites at Crudwell

3.1 Topic Paper 3 – Addendum: Housing Land Supply Text, included in the papers to Cabinet, includes housing supply data for the North and West Wiltshire Housing Market Area and the Malmesbury Community Area, both of which include Crudwell.

3.2 The tables below are from the Topic Paper 3 Addendum. They exclude allocations proposed in the Housing Site Allocations Plan.

Table 3.3: Confirmed 2017 Housing Land Supply for the Wiltshire HMAs (April 2017 base date) excluding the Plan’s proposed allocations.

Area	Housing requirement 2006-2026	Housing completions 2006-2017	Five year housing requirement 2017-2022	Deliverable supply 2017-2022	Number of years of deliverable supply ¹¹
East Wiltshire HMA	5,940	3,624	1,287	2,164	8.41
North & West Wiltshire HMA	24,740	13,025	6,508	7,680	5.90
South Wiltshire HMA	10,420	5,388	2,796	3,014	5.39
Wiltshire HMAs	41,100	22,037	N/A	12,858	N/A
Swindon (within Wiltshire)	900	622	N/A	201	N/A
Wiltshire Total	42,000	22,659	N/A	13,059	N/A

Table 3.1: Residual indicative requirements 2014-2017 by Area⁴

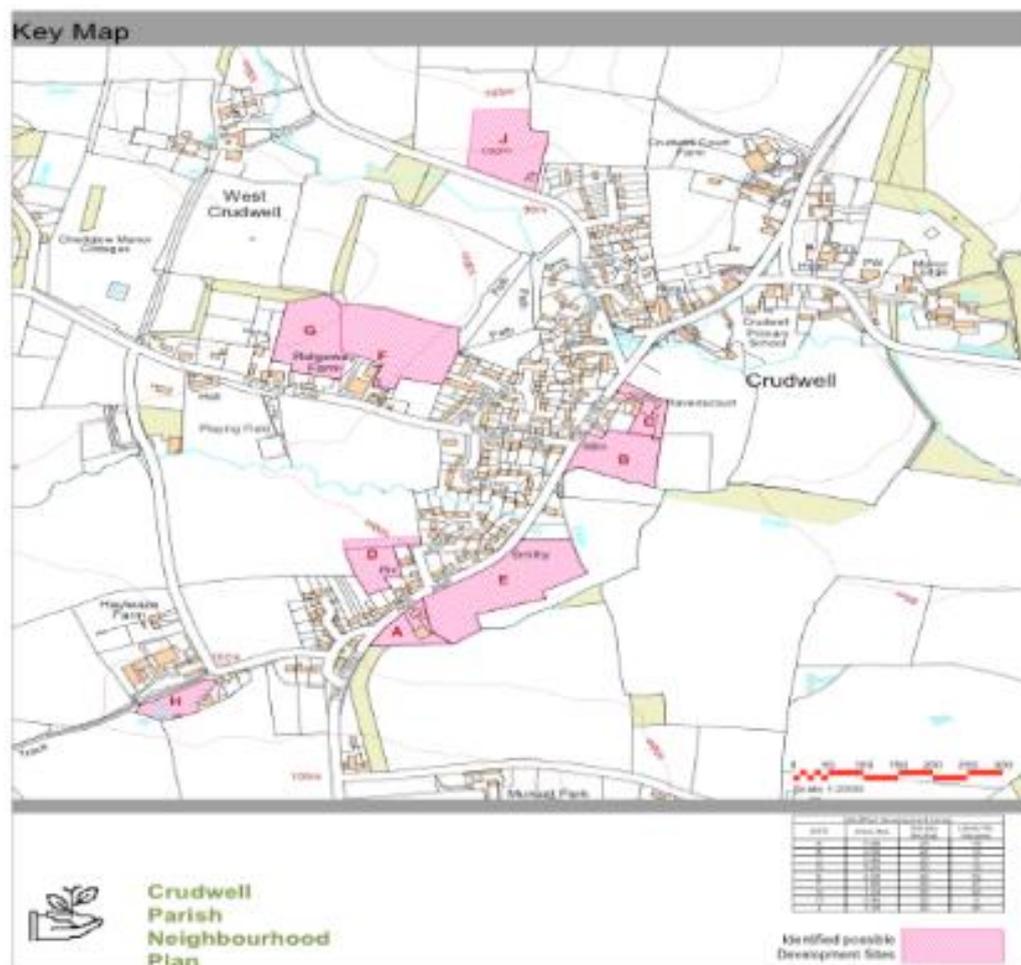
Area	Overall indicative requirement 2006-2026	Residual indicative requirement 2014	Residual indicative requirement 2015	Residual indicative requirement 2016	Residual indicative requirement 2017
Malmesbury	885	0	0	0	0
Malmesbury CA remainder	510	151	116	86	0
Malmesbury CA	1,395	151	116	86	0
NORTH & WEST WILTSHIRE HMA⁵	24,740	3,603	2,489	1,967	1,109

3.3 Table 3.3 indicates that there is currently 5.90 years housing supply in the North and West Wiltshire Housing Market Area, against a target of 5.25 years. There is, therefore, no strategic need for the Housing Site Allocations Plan to identify any housing sites at Crudwell in order to deliver sufficient homes in the housing market area.

- 3.4 Table 3.1 indicates that no new homes are needed in the Malmesbury Community Area as a whole, nor in the Malmesbury Community Area remainder, in order to meet the Community Area's housing requirements up to 2026.
- 3.5 So there is no strategic need for the Housing Site Allocations Plan to identify any housing sites at Crudwell. In the words of Topic Paper 2, this means that "*the most appropriate means to assess local needs and plan growth at each Large Village is through the neighbourhood planning process*".
- 3.6 This was the basis of the case made on behalf of Crudwell Parish Council in representations to the June 2017 draft of the Housing Site Allocations Plan. No response to this fundamental issue is provided in any of the paperwork provided to the Cabinet in May 2018.

4 Crudwell Neighbourhood Plan

- 4.1 The Crudwell Neighbourhood Plan is progressing well.
- 4.2 A number of rounds of consultation have already taken place, a Vision and a set of Objectives have been drafted, Focus Groups have been set up and recommended draft policies, and a draft neighbourhood plan will soon be produced.
- 4.3 In terms of potential housing, a Housing Needs Assessment has determined that 20 to 25 new homes are needed. Wiltshire Officers have seen this report.
- 4.4 A call for sites has been undertaken which resulted in the sites shown on the map below coming forward. These sites include Ridgeway Farm and Tuners Lane, the two sites that got furthest through the Wiltshire Housing Site Allocations process.



- 4.5 Our Design and Development Focus Group has assessed all the above

sites thoroughly, informed by public consultation. Of the sites large enough to deliver an element of affordable housing, the Tuners Lane site is the most popular with the public.

- 4.6 It is clear that the officer recommendation to continue to allocate Ridgeway Farm over the Tuners Lane site was a matter of tight planning judgement. The recommendation not to allocate Tuners Lane refers to “uncertainty” about the suitability of the carriageway and “potential” heritage impacts. The same comments could easily be applied to the Ridgeway Farm site, and other issues with both sites have been raised during public consultation.
- 4.7 Equally, the benefits and mitigations attributed to the Ridgeway Farm site relating to landscape impacts, screening and design, affordable housing provision, impact on the primary school and impact on existing junctions with the A429 could equally apply to the Tuners Lane site.
- 4.8 The Crudwell Neighbourhood Plan Steering Group agreed on 7th June 2018 to ask the Design and Development Focus Group to consider these issues further before deciding which site to propose for allocation in the Neighbourhood Plan. It also debated the merits of identifying a reserve site in the Plan.
- 4.9 This should give an indication of the depth of consideration and rapid progress of the Crudwell Neighbourhood Plan to date, and the good work already undertaken by the Steering Group and Focus Groups
- 4.10 At the May Cabinet meeting, the Council Leader, Baroness Scott, made clear her intention to ensure that emerging Neighbourhood Plans such as Crudwell’s should be given every opportunity to succeed.
- 4.11 Inevitably, if Wiltshire Council continues to pursue any allocations at Crudwell when there is no strategic need to do so and when the local community is forming its own opinion about future growth, this will bring the process into disrepute.
- 4.12 The Cabinet agreed that emerging Neighbourhood Plans should be helped by Council officers to reach regulation 16 draft stage as quickly as possible. Crudwell Parish Council has written separately to request that help.

5 Weight to be given to Wiltshire and Crudwell's emerging plans

5.1 The debate at the May Cabinet meeting was heavily influence by Cllr Sturgis' assertion that only neighbourhood plans that were likely to reach regulation 16 stage before Wiltshire's Site Allocations Plan reached examination could be taken into account. This is partly why Cllr Scott asked for neighbourhood plans to be helped to reach regulation 16 stage.

5.2 However, this is an oversimplification of the inter-relationship between emerging neighbourhood and local plans.

5.3 Paragraph 216 of the National Planning Policy Framework sets out the weight to be given to emerging development plans in planning applications. Both the Crudwell Neighbourhood Plan and the Wiltshire Site Allocations Plan are "emerging plans" in this context, and no distinction is made between the two types of development plan.

5.4 Paragraph 216 reads:

"... decision-takers may also give weight to relevant policies in emerging plans according to:

- the stage of preparation of the emerging plan (the more advanced the preparation, the greater the weight that may be given);*
- the extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given); and*
- the degree of consistency of the relevant policies in the emerging plan to the policies in this Framework (the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given)."*

5.5 Furthermore, the Planning Practice Guidance (Reference ID: 41-007-20170728) provides the following guidance under the heading "*What weight can be attached to an emerging neighbourhood plan when determining planning applications?*"

"Planning applications are decided in accordance with the development plan, unless material considerations indicate otherwise. It is for the

decision maker in each case to determine what is a material consideration and what weight to give to it.

*An emerging neighbourhood plan may be a material consideration. Paragraph 216 of the National Planning Policy Framework sets out the weight that may be given to relevant policies in emerging plans in decision taking. Factors to consider include the stage of preparation of the plan and the extent to which there are unresolved objections to relevant policies. Whilst a referendum ensures that the community has the final say on whether the neighbourhood plan comes into force, as part of the development plan, **decision makers should respect evidence of local support prior to the referendum when seeking to apply weight to an emerging neighbourhood plan.** The consultation statement submitted with the draft neighbourhood plan should reveal the quality and effectiveness of the consultation that has informed the plan proposals. And all representations on the proposals should have been submitted to the local planning authority by the close of the local planning authority's publicity period." (My emphasis)*

- 5.6 It is therefore clear that the strength of support or objection to a plan proposal influences the weight that the plan proposal should be given.
- 5.7 A regulation 14 draft of the Crudwell Neighbourhood Plan will be released well before the Housing Site Allocations Plan reaches examination. If, at this stage, any housing allocation receives a greater degree of support and a lesser degree of objection than the allocation proposed in the Housing Site Allocations Plan, then this influences the weight to be given to the respective proposals.

6 Conclusion

6.1 Crudwell Parish Council continues to object to the proposed allocation of Ridgeway Farm for 50 dwellings (or 40 additional dwellings) on the basis that:

- there is no strategic need for the Housing Site Allocations Plan to identify any housing sites in the Malmesbury Community Area;
- in that context, Wiltshire Council's own documentation states that *"the most appropriate means to assess local needs and plan growth at each Large Village is through the neighbourhood planning process"*
- the emerging Crudwell Neighbourhood Plan is advancing rapidly and has already been the subject of a number of rounds of public consultation and exhibitions;
- the Crudwell Neighbourhood Plan will identify a housing site or sites to meet its local housing needs as defined by a housing needs assessment produced to inform it;
- the collaborative and inclusive approach adopted in producing the Crudwell Neighbourhood Plan is intended to achieve public support to a far greater extent than Wiltshire's Housing Site Allocations Plan has achieved;
- the weight to be given to the emerging Housing Site Allocations Plan and Neighbourhood Plan is not only a matter of the stage they have each reached; it is also a function of the level of support and objection to each document.

6.2 On that basis, we request that the Housing Site Allocations Plan removes any proposed allocations in Crudwell, and allows the Crudwell Neighbourhood Plan to make the decision about Crudwell's growth.



Peter Gilchriest

Chair Crudwell Parish Council

From: [Karungi Grant](#)
To: [Spatial Planning Policy](#)
Subject: Wiltshire Housing Site Allocations Plan *REF: 2 - printed*
Date: 29 May 2018 08:24:55

Re: The Codford proposals for revised settlement boundaries (HSAP submission May 2018). Parish Council is happy with the current proposal; could you also include :
G5, H5, Bury Farm this site is already being built on and the Parish Council feels this should now be included, and
D4, Ivy Cottages, propose to consider this site for redevelopment.

regards

Karungi Grant
Clerk, Codford Parish Council

Tel: 01985 850523
21A Cherry Orchard, Codford
Warminster BA12 0PN



Westbury Town Council

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www.westburytowncouncil.gov.uk

Spatial Planning
Economic Development and Planning
County Hall
Trowbridge
Wiltshire
BA14 8JD

4th June 2018

Reference: Briefing Note on Wiltshire Housing Site Allocations Plan No. 355

Westbury Town Council does not have any adverse comments although we note that excessive development has taken place in Westbury previously due to the absence of a 5-year plan and identified sites which made speculative projects.

We welcome that it has been recognised that Westbury has seen over development and at this time no further development is desirable or necessary although we would point out as previously that there has been no infrastructure improvements to help sustain such development.

The draft plan fails to appreciate or address the fact that surrounding towns although not identified as providing more housing other than that in the pipeline will be affected by building in adjacent parishes. For example, the additional dwellings in Bratton are likely to impact on Westbury without any subsequent benefit to Westbury.

Mike Sutton

Chair
Highways Planning and Development

SEEND PARISH COUNCIL

Parish Clerk: Mrs Sue Bond
61 Seend Cleeve
Melksham
Wiltshire
SN12 6PX

Email: clerk@seendparishcouncil.co.uk
Tel: 07706 850859

5th June 2018

To: spatialplanning@wiltshire.gov.uk

Seend Parish Council's response to Wiltshire Housing Site Allocations Plan in relation to the proposed changes to Seend Parish's Settlement Boundary June 2018.

The newly revised draft Seend Settlement Boundary was discussed at Seend Parish Council's meeting on 29th May, and by the Seend Neighbourhood Plan Steering Group. All are in agreement with the following submission.

We are pleased to see that many of our recommended amendments following the first draft circulated last September 2017 have been taken into consideration. However, we would still like to see the following amendment made as per our previous submission.

On the western boundary at F8/G8, we do not agree that this site should be included within the settlement boundary as the site is more related to the open countryside, especially in relation to the expansive views it provides.

On H8/I8 we see you have included more of the frontage of Seend House which was not included in our original response of September 2017, and we would like the boundary line drawn back to the trees and the properties as per our previous submission.

We request that we are kept informed at each stage and reserve the right to be involved with the progress of the policy on the settlement boundaries until its adoption in Winter 2018.

The following resolutions were approved at the extraordinary meeting of the Policy & Resources Committee of Trowbridge Town Council held on Tuesday 5th June 2018.

- A. **Trowbridge Town Council supports Wiltshire Council's allocation of 1000 of the Windfalls allowance for the N&W HMA to Trowbridge CA as expressed by Councillor Sturgis at the Trowbridge Area Board on Thursday 24th May 2018.**
- B. **Trowbridge Town Council therefore agrees with Wiltshire Council that the shortfall in supply for the Trowbridge Community Area is 843 houses in the period up to 2026.**
- C. **Trowbridge Town Council supports Wiltshire Council in seeking to allocate a surplus in order to ensure that the five-year land supply can be met in the HMA and that this is met through identifying sites for 1100 houses.**

- D. **Trowbridge Town Council supports Wiltshire Council in the allocation of the following sites to meet part of the shortfall:**

Spring Meadows 3260	45
Elm Grove Farm 248/613	250
Church Lane 1021	45

- and; **Trowbridge Town Council supports the allocation of the following alternative sites to meet part of the shortfall:**

Additional allocation at Wain Homes' part of Ashton Park	21
Biss Farm 3247	267

- E. **Trowbridge Town Council does not support the following sites which are contrary to the Wiltshire Core Strategy:**

S of Elizabeth Way	355
W H BP	225
Southwick Court	180

- F. **Trowbridge Town Council agrees with Wiltshire Council, that the WCS figures are indicative only and should not be adhered to rigidly and therefore supports the reallocation of; 72 houses to the neighbouring villages, in order to ensure that they continue to maintain sustainability and local infrastructure; and 400 houses to other towns in the HMA such as Melksham, Calne and Westbury, to ensure that they can continue to sustain economic growth and the viability and vitality of their town centres, throughout the plan period.**
- G. **Trowbridge Town Council supports Wiltshire Council in meeting the longer term growth for Trowbridge through a review of the WCS and in particular a review of the Green Belt.**
- H. **Trowbridge Town Council does not support the redevelopment of the QEII 'Fields in Trust' Elm Grove Recreation Ground as part of a housing site allocation or school development and requests that the Spatial Planning Team identify the justification for a new 2 form entry primary school in this part of the town and also considers use of any land in this area in the ownership of Coulston Estates or Wiltshire Council that could accommodate a new site for Larkrise School. And that alternative arrangements to accommodate the school and housing development are brought forward which retain the Elm Grove Recreation Ground as a focal centre for the community, linking the existing and new developments.**
- I. **That regarding the sites put forward by Wiltshire Council, Trowbridge Town Council views with great concern the lack of transparency in respect of Spatial Planning's dealings with site owners and promoters. Additionally, Spatial Planning have failed to observe the protocol whereby ward councillors are fully briefed, at an early stage, of any major proposals for their area.**

Trowbridge Town Council

Working with the Community

HSAP Proposed Amendments 8th June 2018

Introduction

Trowbridge Town Council has considered the proposed Wiltshire Housing Site Allocations Plan on a number of occasions. Following deferral of further consideration by Wiltshire Council at its Cabinet meeting on 15th May, the town council reconsidered the matter at an extraordinary meeting of the Policy and Resources Committee held on Tuesday 5th June. The committee, having considered the matter resolved the following:

- A. **Trowbridge Town Council supports Wiltshire Council's allocation of 1000 of the Windfalls allowance for the N&W HMA to Trowbridge CA as expressed by Councillor Sturgis at the Trowbridge Area Board on Thursday 24th May 2018.**
- B. **Trowbridge Town Council therefore agrees with Wiltshire Council that the shortfall in supply for the Trowbridge Community Area is 843 houses in the period up to 2026.**
- C. **Trowbridge Town Council supports Wiltshire Council in seeking to allocate a surplus in order to ensure that the five-year land supply can be met in the HMA and that this is met through identifying sites for 1100 houses.**

- D. **Trowbridge Town Council supports Wiltshire Council in the allocation of the following sites to meet part of the shortfall:**

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and; Trowbridge Town Council supports the allocation of the following alternative sites to meet part of the shortfall:

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- G. **Trowbridge Town Council supports Wiltshire Council in meeting the longer term growth for Trowbridge through a review of the WCS and in particular a review of the Green Belt.**
- H. **Trowbridge Town Council does not support the redevelopment of the QEII 'Fields in Trust' Elm Grove Recreation Ground as part of a housing site allocation or school development and requests that the Spatial Planning Team identify the justification for a new 2 form entry primary school in this part of the town and also considers use of any land in this area in the ownership of Coulston Estates or Wiltshire Council that could accommodate a new site for Larkrise School. And that alternative arrangements to accommodate the school and housing development are brought forward which retain the Elm Grove Recreation Ground as a focal centre for the community, linking the existing and new developments.**
- I. **That regarding the sites put forward by Wiltshire Council, Trowbridge Town Council views with great concern the lack of transparency in respect of Spatial Planning's dealings with site owners and promoters. Additionally, Spatial Planning have failed to observe the protocol whereby ward councillors are fully briefed, at an early stage, of any major proposals for their area.**

Trowbridge Town Council*Working with the Community*HSAP Proposed Amendments 8th June 2018**Proposed amendments**

Further to the resolutions above, the town council now presents the following amendments to the Schedule of Proposed Changes, as required by the procedure outlined in Briefing note 355 published on 17th May 2018.

Policy H2

The starting point Policy H2 is:

Policy H2

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

Table 5.3 North and West Wiltshire Housing Market Area

Community Area	Reference	Site Name	No of dwellings
Trowbridge	H2.1	Elm Grove Farm, Trowbridge	200
	H2.2	Land off the A363 at White Horse Business Park, Trowbridge	150
	H2.3	Elizabeth Way, Trowbridge	205
	H2.4	Church Lane, Trowbridge	45
	H2.5	Upper Studley, Trowbridge	20
	H2.6	Southwick Court, Trowbridge	180

The changes to Policy H2 proposed by Wiltshire Council are:

Policy H2

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

Table 5.3 North and West Wiltshire Housing Market Area

Community Area	Reference	Site Name	No of dwellings
Trowbridge	H2.1	Elm Grove Farm, Trowbridge	250
	H2.2	Land off the A363 at White Horse Business Park, Trowbridge	225
	H2.3	Elizabeth Way, Trowbridge	355
	H2.4	Church Lane, Trowbridge	45
	H2.5	Upper Studley, Trowbridge	45
	H2.6	Southwick Court, Trowbridge	180

Trowbridge Town Council*Working with the Community*HSAP Proposed Amendments 8th June 2018

The amended changes to Policy H2 proposed by Trowbridge Town Council are:

Policy H2

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

Table 5.3 North and West Wiltshire Housing Market Area

Community Area	Reference	Site Name	No of dwellings
Trowbridge	H2.1	Elm Grove Farm, Trowbridge	250
	H2.2	<i>Deleted</i>	
	H2.3	<i>Deleted</i>	
	H2.4	Church Lane, Trowbridge	45
	H2.5	Upper Studley, Trowbridge	45
	H2.6	<i>Deleted</i>	
	H2.7	Biss Farm, Trowbridge	267

Policy H2.1

The starting point Policy H2 is:

Policy H2.1

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

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

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

Trowbridge Town Council

Working with the Community

HSAP Proposed Amendments 8th June 2018

The changes to Policy H2.1 proposed by Wiltshire Council are:

Policy H2.1

Approximately 17.78ha of land at Elm Grove Farm, as identified on the Policies Map, is proposed for mixed use development comprising the following elements:

- **Approximately 250 dwellings;**
- **At least 1.8ha of land for a two form entry primary school along with playing pitches on land owned by the Council, but held in Trust (the existing Queen Elizabeth II Field);**
- **A multi-purpose community facility;**
- **A significantly improved and consolidated public open space area adjacent to the existing Queen Elizabeth II Field to provide a play area and junior level sports pitches for local community teams to utilise;**
- **A road from the A363 through to an improved junction of Drynham Lane and Wiltshire Drive; and**
- **New cycling and walking routes through the site to link into the existing network and the proposed Ashton Park Strategic Allocation site, and the White Horse Business Park.**

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

The amended changes to Policy H2.1 proposed by Trowbridge Town Council are:

Policy H2.1

Approximately 17.78ha of land at Elm Grove Farm, as identified on the Policies Map, is proposed for mixed use development comprising the following elements:

- **Approximately 250 dwellings;**
- **At least 1.8ha of land for a two form entry primary school along with playing pitches;**
- **A multi-purpose community facility;**
- **A significantly improved and consolidated public open space area, a focal centre for the community, linking the existing and new development at the existing Queen Elizabeth II Field to provide a play area and junior level sports pitches for local community teams to utilise;**
- **A road from the A363 through to an improved junction of Drynham Lane and Wiltshire Drive; and**
- **New cycling and walking routes through the site to link into the existing network and the proposed Ashton Park Strategic Allocation site, and the White Horse Business Park.**

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

In addition Trowbridge Town Council proposes that any consequential amendments to the supporting text, reflecting the above, should also be made to paragraph 5.46.

Policy H2.2

Trowbridge Town Council's proposal is that Policy H2.2 is deleted in its entirety.

Policy H2.3

Trowbridge Town Council's proposal is that Policy H2.3 is deleted in its entirety.

Policy H2.4

Trowbridge Town Council proposes no amendments to Policy H2.3 in addition to those already made by Wiltshire Council.

Policy H2.5

Trowbridge Town Council proposes no amendments to Policy H2.5 in addition to those already made by Wiltshire Council.

Policy H2.6

Trowbridge Town Council's proposal is that Policy H2.6 is deleted in its entirety.

Policy H2.7

Trowbridge Town Council proposes an amendment to add a new policy H2.7

Policy H2.7

Approximately 14.00ha of land at Biss Farm, as identified on the Policies Map, is proposed for mixed use development comprising the following elements:

- **Approximately 267 dwellings;**
- **At least 1.6ha of land for a two form entry primary school along with playing pitches;**
- **Approximately 0.7ha for an extra-care facility, use class C2;**
- **Approximately 0.5ha for use class A3/A4**
- **Public open space; and**
- **Cycling and walking routes through the site to link into the existing network and the proposed Ashton Park Strategic Allocation site.**

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

Other amendments

Trowbridge Town Council does not fully understand how, given the nature of the work already undertaken, or not undertaken, it is possible to make proposals for amendments, in respect of the following:

- An increase in the number of houses allocated to Ashton Park from 2600 to 2621.
- The reallocation from Trowbridge to the villages in the Trowbridge Community Area of 72 houses.
- The reallocation from Trowbridge to other towns in the N&WHMA of 400 houses.
- The apportionment of the N&WHMA 'Windfalls' figure of 2209 to include 1000 windfalls within the Trowbridge total.

Trowbridge Town Council seeks to achieve some of this by the following amendment to paragraph 4.53

The starting point Paragraph 4.53 is:

4.53 One main reason for a shortfall in land supply is the complexity and consequent delay developing Ashton Park, a south eastern extension to the town. 1,600 dwellings will be built on this site in the plan period and a further 1,000 post 2026; rather than first envisaged that the whole of the allocation would have been completed in the plan period. This can be seen to account for 1,000 of the 1,220 dwelling shortfall.

The amended changes to Paragraph 4.53 proposed by Trowbridge Town Council are:

4.53 One main reason for a shortfall in land supply is the complexity and consequent delay developing Ashton Park, a south eastern extension to the town. 1,600 dwellings will be built on this site in the plan period and a further 1,000 post 2026; rather than first envisaged that the whole of the allocation would have been completed in the plan period. This can be seen to account for 1,000 of the 1,220 dwelling shortfall. Recognising the flexibility of the WCS figures as expressed in Paragraph 4.35 it is now appropriate to reallocate some of the housing numbers from Trowbridge town to other places in the HMA which have shown an ability to develop sustainably at a quicker rate than previously envisaged and that may, without such additional development, not be able to adequately sustain facilities and infrastructure in their communities. These reallocations are; 72 houses to other large villages in the Trowbridge Community Area and 400 houses to other towns in the N&WHMA. These reallocations should be the subject of further consideration during the examination. A reduction of the Trowbridge quantum from 6810 to 6338 still leaves Trowbridge as the largest single location for development in Wiltshire and does NOT detract from the WCS primary focus for development at the Principal Settlements.



A community
that cares

Durrington Town Council would like to comment further on the Draft Wiltshire Housing Site Allocations Plan following the deferral of a decision by Cabinet on the 15th of May 2018 to take it to Council on the 22nd of May 2018.

The Town Council has considered Wiltshire Council's responses under Regulation 22, Appendix M relating to Durrington and provides the following update for consideration:

21.108/109/110

Large Villages

Wiltshire Council has not addressed the issue of Durrington being included as the Market Town of Amesbury (including Bulford and Durrington), it should be re-classified on its own as a Large Village.

Only housing site allocations for Durrington alone have been put forward to this stage, there is no allocation for Bulford or Amesbury within the same Market Town. Durrington Town Council are aware of a potential freehold site belonging to Lincoln College on the London Road in Amesbury that has proposals for circa 73 homes, this was initially assessed as less sustainable due to noise concerns and potential A303 plans. Planners indicate that tests have been conducted and measures could be put in place to mitigate noise. With updated A303 plans, could this site be re-assessed?

Army Rebasing

There is no 'master-planned approach' for Durrington based on Army Rebasing, despite it incorporating Larkhill within its Parish and being sandwiched between Larkhill and Bulford. Wiltshire Council's requirement to find land and build more houses in line with Government directives is not working in tandem with Army Rebasing to completely understand the impact that Rebasing will have on Durrington. Building 440 houses within the Parish, along with another 225 on the outskirts in Bulford will already have a significant impact on Durrington without Wiltshire Council allocating another 60 houses in Durrington itself.

The impact on Durrington's roads and facilities has not been thoroughly considered. There is no planned investment by Wiltshire Council or Army Rebasing to improve roads within Durrington, despite the potential for thousands more road users travelling through the village. The original Traffic Assessment within Army Rebasing is outdated with a requirement for a new assessment to be conducted prior to the increase in service personnel and their families arriving at Larkhill/Bulford. This needs to include roads within Durrington (Particularly Larkhill Road/Bulford Hill), it would also benefit from an Assessment post arrival to fully determine the impact of the extra few thousand personnel in the area.

Army Rebasing in Larkhill will provide 440 homes and approximately 1500 single service personnel will move to the area. The only improvements to infrastructure are a new road layout (roundabout) on The Packway, a new medical and dental centre for both military and civilian patients (although capacity/quotas for civilians is unknown) and a new primary school including pre-school places. Of note, this will be the relocated St Michael's School from Figheldean. Residents will still use Durrington for local facilities such as shops, schools, leisure, garages and an access route to the A303 Eastbound. The Town Council is informed by MOD staff at Larkhill Garrison that only service personnel and their families working in Larkhill will be allocated housing in Larkhill, potentially mitigating some traffic movements in the area on a daily basis. In reality, this is not achievable due to Larkhill Garrison not owning the outsourced housing allocation system in place pan Armed Forces. Likewise, Army Rebasing in Bulford will provide 225 new homes just outside the boundary of Durrington. With limited facilities in Bulford itself, it is anticipated that more traffic will access Durrington from Bulford particularly using Bulford Hill and Larkhill Road as access routes to/from the A303 and A345.

21.127/128/129

Clover Lane

When the Avon Fields Site on Clover Lane was planned it was only accepted by Salisbury District Council on a Master Plan that designed the roads and access to the site within strict criteria, it was never designed to cope with the newly proposed numbers. The impact of a further 45 houses linking into the Avon Fields Estate needs addressing from a Highways perspective not that of the site promoters.

Conclusion

The Plan is unsound; it is not justified to make a decision at this time on extra houses being built in Durrington whilst the full impact of Army Rebasing on Durrington is unknown. The evidence will only be available once Army Rebasing has taken place. Whilst the Plan may be consistent with national policy, there is a conflict with Army Rebasing. Wiltshire Council is driving forward with its requirement to find land and build houses with the view that Core Policy 37 of the Wiltshire Core Strategy has dealt with everything required for Army Rebasing, when this is not the case. Larkhill cannot possibly provide everything that service personnel and their families require within the limits of Larkhill itself, therefore residents will be very reliant on Durrington.



Cllr JP Todd - Chairman

Yatton Keynell Parish Council

23 John Aubrey Close
Yatton Keynell
Chippenham
SN14 7EG

Spatial Planning
Economic Development & Planning
Wiltshire Council, County Hall
Bythesea Road
Trowbridge
BA14 8JN

8th June 2018

Dear Sir,

Draft Wiltshire Housing Site Allocations Plan - Changes to the Schedule of Proposed Changes

Yatton Keynell Parish Council request that the following amendments are made to the schedule of proposed changes.

Proposed Change 68 – Paragraph 5.109

Insert additional wording to improve clarity and to reflect the Parish Council's concerns expressed in their submission of 18th September with regards to the ability of the fresh water supply system and foul water system to cope with a development of 30 houses.

Proposed Change 69 – Paragraph 5.110

Access directly from the B4039 was identified as the preferred access point in the Parish Council's submission dated 18th September 2017, this was supported by Cllr Baroness J Scott who advised Wiltshire Council's officers accordingly. Cllr Baroness J Scott has reconfirmed the above on the 4th of June in a telephone conversation with our Chairman.

Therefore the final sentence should be changed to remove reference to vehicular access being through Farrells Fields to read "Access would be taken directly from the B4039 with provision for pedestrian only access through Farrells Field."

Yours faithfully

Ian J Plowman
Clerk to Yatton Keynell Parish Council

Briefing Note 355

Wiltshire Housing Site Allocations Plan

Response by North Bradley and Market Lavington Parish Councils

1.0 Introduction

Wiltshire Council is currently preparing its Housing Site Allocations Plan (HSAP). Section 1.2 of the above briefing note invites further comments on the proposed schedule of changes by noon on 11th June 2018. This document is such a response, with detailed comments being made in section 3.

1.1 Both Market Lavington and North Bradley Parish Councils are coincidentally midway through preparing neighbourhood plans (NDP's) and are alarmed and concerned that the HSAP as written and as modified by the proposed schedule directly conflicts with the Localism Agenda on which neighbourhood planning is based and which Wiltshire Council is bound by. Specifically, Localism is intended to enhance community involvement in planning whereas the HSAP process has led to ignoring a great deal of work undertaken selflessly by community volunteers and aimed at helping Wiltshire deliver necessary housing *with community support*.

1.2 Notwithstanding statements made by Wiltshire Council's officers, members should be aware that the above two neighbourhood plans have received professional advice and it is clear to them that the HSAP, as written, risks being found to be unsound at Examination, for the reasons that follow. As presently drafted, both Parish Councils will have no alternative but to object at the EIP and argue that the HSAP be rejected as unsound. They also intend to approach the Secretary of State directly about the HSAP and with specific and general comments about the failings of the present neighbourhood planning service provided by Wiltshire Council to NDP groups. The results of these exchanges will be published in the local press via the NDP groups' media officer. They will also approach their local MP's to ask that questions be raised at higher levels. You should not underestimate the anger and disappointment that is currently being felt, nor the determination that exists to put the situation right.

1.3 Conflicts in terms of site allocations exist between the HSAP and both the above neighbourhood plans, and these unfortunately stem from a fundamental misinterpretation of the Regulations by Wiltshire Council. This has resulted in a deeply flawed planning process, likely to undermine the HSAP. Members need to be aware of this, because it conflicts with what they are being told by officers. It has also caused the volunteer groups, giving up their time to produce the neighbourhood plans, to conclude that Wiltshire Council still prefers a traditional pre-localism, top-down planning approach rather than one based on co-operation and co-ordination with neighbourhood planning in Wiltshire.

1.4 As a result of the Wiltshire approach, there is now an emerging conflict between many neighbourhood plans and Wiltshire policy. This is completely unnecessary and most regrettable – but there is still time to put this right and deliver the housing we need with community consent.

1.5 Numerous attempts have been made to begin a dialogue for example:

North Bradley:

- Response to HSAP – August 2017 (detailed explanation of emerging conflict)
- Letter to Spatial Planning – March 2018

Market Lavington:

- Letter of Concern 28th June 2017
- Response to HSAP – August 2017 (detailed explanation of emerging conflict)
- Letter 29th August 2017
- Letter 26th September 2017

However, Wiltshire Council shows little interest in genuine partnership working.

1.6 The slow and inadequate responses to these urgent pleas to co-operate in planning Wiltshire's future, together with poor levels of support in general (see below) indicate that Wiltshire Council still prefers traditional top-down planning and does not want real engagement between neighbourhood plans and their own strategies.

The consequences for this flawed approach, if not corrected, are likely to include:

- The rejection of the HSAP at Examination
- Damage to the image of Wiltshire Council if seen to be ignoring Localism and the rights of the community to have a fair say in planning their future (the debate will extend into the local press).
- Considerable loss of public money and time (the Parish Council's intend to submit a freedom of information request to determine how much has been spent by Wiltshire Council. Grant payments to the NDP groups are also likely to have been wasted if the plans continue to be ignored.
- Significant extra work for neighbourhood plan groups and widespread damage to the reputation of neighbourhood planning in Wiltshire (the two PC's are in contact with other groups who also have concerns they are considering bringing to the EIP and the Secretary of State).
- Delays in delivering the necessary housing for Wiltshire

1.7 It is essential that members realise that conflict between neighbourhood planning and the HSAP is not what the NDP groups want. They are not opposed to providing the necessary housing for Wiltshire; the disagreement is ONLY over whether this should be met – at least partly - through the democratic, community-based approach of neighbourhood planning or whether sites should be imposed in a top-down manner by Wiltshire Council. The latter approach is what the HSAP uses.

1.8 Both NDP's have good strategies, based on factual professional evidence that command public support. However, they, like all neighbourhood plans in Wiltshire, have been effectively ignored by the HSAP process. The statement at 3.3 in the Briefing Note that a comprehensive approach to neighbourhood planning has been taken is false. The actual approach, contrary to Government guidance, has been to deliberately ignore all neighbourhood plans until near their final stages (Reg 16). This delay in engaging with local groups has created the present conflict and could easily have been avoided. The Wiltshire approach contrasts with more enlightened approaches elsewhere – for example at East Cambridgeshire Council - Neighbourhood planning does not have to be done this way.

2.0 **Background to Reasoned Justification**

Section 3 following contains detailed responses to the Schedule contained within the Briefing Note. However it is considered essential for members to realise just how flawed the HSAP process has been and so it is first necessary to present some basic arguments to set the comments in context.

2.1 The present approach of the HSAP is to take note of neighbourhood plans *only after they reach a very advanced stage* (Regulation 16 stage – i.e. submission). This is far too late, and it means that NDP groups may in some cases have been patiently working up proposals for years only to have them overridden at the last minute by the HSAP, with huge waste of effort and money resulting (it should be remembered that the NDP groups are funded by Government grants, so this is tax-payer's money that is being thrown away on abortive work).

2.2 In fact, Annex 1. Paragraph 216 of the NPPF says:

From the day of publication, decision-takers may also give weight to relevant policies in emerging plans according to:

- *the stage of preparation of the emerging plan (the more advanced the preparation, the greater the weight that may be given);*
- *the extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given); and*
- *the degree of consistency of the relevant policies in the emerging plan to the policies in this Framework (the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given).*

2.3 Wiltshire Council's approach is far too crude in giving no weight at all before the Reg.16 stage and only after that considering it relevant. The NPPF implies a much more nuanced and gradual approach.

In fact, Planning Practice Guidance explicitly requires decision makers to '*respect evidence of local support prior to referendum*' – that is BEFORE Reg.16 has been reached.

Planning Practice Guidance Neighbourhood Planning para 07 says:

'An emerging neighbourhood plan may be a material consideration. Factors to consider include the stage of preparation of the plan and the extent to which there are unresolved objections to relevant policies.... Decision makers should respect evidence of local support prior to referendum when seeking to apply weight to an emerging neighbourhood plan.It is for the decision maker in each case to determine what a material consideration is and what weight to give it.'

2.4 In summary, the Wiltshire approach relies on a very narrow view of the Regulations and ignores three main things:

- The wider regulatory context including planning practice guidance
- Best practice elsewhere
- Recent judgements in the Courts.

The above points will be explored below.

2.5 **The wider regulatory context.**

Consultation.

The statement at 3.3 of the Briefing Note that a *'comprehensive assessment of neighbourhood plan's across Wiltshire has also been undertaken'* is simply not true. A rough census of plans has been compiled but the approach has been to ignore **their actual proposals** until Regulation 16 and this falls far short of what is required by the Regulations.

Additionally, while Parish Council's were consulted, there was no direct consultation with Neighbourhood Plan Steering Groups – these are semi-autonomous and simply consulting the Parish Council is not sufficient. Both North Bradley and Market Lavington Steering Groups communicated their ideas to Wiltshire Council at an early stage but these were brushed aside and an attempt made to impose the HSAP against community wishes.

2.6 Duty to co-operate

The duty to co-operate in relation to planning of sustainable development is enshrined in law through Section 33A of the Planning and Compulsory Purchase Act 2004 (PCPA) (inserted by Section 110 of the Localism Act 2011). It is also included within the National Planning Policy Framework (NPPF). The NPPF Paragraph 157 states: *'Crucially, Local Plans should ... be based on co-operation with neighbouring authorities, public, voluntary and private sector organisations'*.

PPG adds:

'The local planning authority should work with the qualifying body to produce complementary neighbourhood and Local Plans. It is important to minimise any conflicts between policies in the neighbourhood plan and those in the emerging Local Plan, including housing supply policies. This is because section 38(5) of the Planning and Compulsory Purchase Act 2004 requires that the conflict must be resolved by the decision maker favouring the policy which is contained in the last document to become part of the development plan.'

Neighbourhood plans should consider providing indicative delivery timetables, and allocating reserve sites to ensure that emerging evidence of housing need is addressed. This can help minimise potential conflicts and ensure that policies in the neighbourhood plan are not overridden by a new Local Plan'. Paragraph: Planning Practice Guidance, Neighbourhood Plans, 009 Reference ID: 41-009-20160211.

Regarding the duty to co-operate, PPG says:

'The duty requires active and sustained engagement. Local planning authorities and other public bodies must work together constructively from the outset of plan preparation to maximise the effectiveness of strategic planning policies. It is unlikely that this could be satisfied by consultation alone. Local planning authorities that cannot demonstrate that they have complied with the duty will fail the independent examination process'. Paragraph: 009 Reference ID: 9-009-20140306

- 2.7 while a list of prescribed organisations is set out in Regulation 4 of the Town & Country Planning (Local Planning) (England) Regulations 2012 as amended (the Regulations), it is not generally realised that this list is NOT EXHAUSTIVE. It does not specifically list parish councils or neighbourhood plan groups. However the Regulations DO stress the need for co-operation in the preparation of plans and it seems essential therefore that such close co-operation exists where Wiltshire Council is preparing a Local Plan and well-established neighbourhood plan groups are likewise engaged. How can good, efficient and democratic planning happen otherwise?
- 2.8 In fact, attempts by the NDP teams to work with the LPA have been rebuffed, with local proposals over-riden by Wiltshire Council. There has been none of the collaborative working required by PPG . Wiltshire Council has decided to ignore the actual content all plans until a very late stage – despite the years of unpaid voluntary work and tens of thousands of tax pounds that that have gone into them by that point. This wastage of community effort, goodwill and public money cannot be either wise or correct.

Let's see what PPG has to say about the nature of the co-operation required:

'Cooperation should take place throughout Local Plan preparation – it is important not to confine cooperation to any one point in the process.

Local planning authorities and other public bodies need to work together from the outset at the plan scoping and evidence gathering stages before options for the planning strategy are identified. That will help to identify and assess the implications of any strategic cross boundary issues on which they need to work together and maximise the effectiveness of Local Plans. After that they will need to continue working together to develop effective planning policies and delivery strategies. Cooperation should continue until plans are submitted for examination and beyond, into delivery and review.

Local planning authorities should bear in mind that failure to demonstrate compliance with the duty at the Local Plan examination cannot be corrected after the Local Plan has been submitted for examination. The most likely outcome of a failure to demonstrate compliance will be that the local planning authority will withdraw the Local Plan'. PPG Paragraph: 012 Reference ID: 9-012-20140306

2.9 In connection with the NDP's of North Bradley and Market Lavington, there has been no:

- Early pre-HSAP-publication discussion of sites
- No joint working groups established
- No detailed responses given to very detailed submissions
- No attempt to create a joint, as opposed to Wiltshire Council strategy, by combining or 'trading' sites to reflect local wishes.

2.10 Wiltshire Council's approach seems to be to take no note of emerging policies or sites in neighbourhood plans until Regulation 16 – right near the end of the NDP process. How can this be working *'together from the outset* (emphasis ours) *at the plan scoping and evidence gathering stages before options for the planning strategy are identified'*? How can over-riding years of work by community volunteers be helping to minimise *'any conflicts between policies in the neighbourhood plan and those in the emerging Local Plan, including housing supply policies'* (PPG)? Simply providing some very basic support yet making no effort to take on board emerging NDP ideas or respond to requests to harmonise the merging HSAP strategy with that of emerging NDP's cannot be meaningful co-operation or consultation.

2.11 By eschewing effective and meaningful partnership working in favour of quicker, cheaper but far less democratic top-down planning, it is impossible to deliver what Government guidance requires – see PPG 009 Reference ID: 41-009- 20160211;

'The local planning authority should work with the qualifying body to produce complementary neighbourhood and Local Plans. It is important to minimise any conflicts between policies in the neighbourhood plan and those in the emerging Local Plan, including housing supply policies'

The present Wiltshire approach of ignoring emerging neighbourhood plan sites until the plan submission stage makes conflict inevitable. What should have happened was that Wiltshire Council should have done an audit of emerging NDP sites before producing the HSAP and then seen if any of these could be taken forward in a joint planning process. THIS CRUCIAL STAGE WAS OMITTED.

2.12 Localism

The Localism Act 2011 was designed to give local communities more control over what happens in their areas. The NPPF emphasises this, clearly indicating that giving local communities a say in planning is crucial; indeed, this forms one of the Core Planning Principles set out in paragraph 17 of the Framework:

'Within the overarching roles that the planning system ought to play, a set of core land use planning principles should underpin both plan-making and decision-taking. These principles are that planning should:

*be genuinely plan-led, **empowering local people to shape their surroundings, with succinct local and neighbourhood plans setting out a positive vision for the future of the area.** Plans should be kept up-to-date, and be based on joint working and co-operation to address larger than local issues. They should provide a practical framework within which decisions on planning applications can be made with a high degree of predictability and efficiency;'*

2.13 Since the Localism Act, the direction of travel of Government policy towards neighbourhood planning has been clear; successive measures have strengthened it – including the 2017 Neighbourhood Planning Act. Wiltshire Council officers seem unwilling to acknowledge this changed context, but it is clear from ministerial statements and court judgements (of which more later). Other authorities are also responding more positively.

2.14 What the parish councils would have liked would have been an early review of emerging sites and an agreed joint approach. It is quite in order form an NDP to propose alternative sites to an emerging Local Plan – yet this cannot take place unless the LPA is willing to co-operate. The NDP teams feel that they have been denied this ability.

'A neighbourhood plan can propose allocating alternative sites to those in a Local Plan, but a qualifying body should discuss with the local planning authority why it considers the Local Plan allocations no longer appropriate. In rural areas, all settlements can play a role in delivering sustainable development.' PPG Paragraph: 044 Reference ID: 41-044-20160519

PPG continues:

'If a local planning authority is also intending to allocate sites in the same neighbourhood area the local planning authority should avoid duplicating planning processes that will apply to the neighbourhood area. It should work constructively with a qualifying body to enable a neighbourhood plan to make timely progress'. PPG Paragraph: 043 Reference ID: 41-043-20140306

2.15 It might be argued that involving NDPs could slow down delivery of strategic needs, but this need not be the case. Both the NDP's the subject of this Response and the HSAP are at similar stages. NDPs are also generally faster than traditional local plans.

Nationally, two studies by the DCLG have conclusively demonstrated that NDP's actually delivery MORE housing and do it faster than do traditional Local Plans. (<https://www.gov.uk/government/collections/notes>)

2.16 **Best practice elsewhere**

Wiltshire Council officers argue that they are impelled to take their present approach due to the pressing need to deliver strategic housing. However, this is false. Not only are the timescale of NDPS and the HSAP similar, other authorities are pursuing more enlightened approaches, where neighbourhood planning and local planning co-operate much more closely and efficiently.

2.17 For example, East Cambridgeshire District Council, gives weight to emerging NDP's at this stage. East Cambs., talking about their Local Plan on their website states:

"To support Neighbourhood Planning, the East Cambs Local Plan (which is at an early stage of preparation as at January 2016) will:

- *Be prepared expediently to ensure an up-to-date Local Plan is in place;*
- *Address clearly and fully the strategic priorities for the district;*
- *Clarify which policies are "strategic" (and which are "non-strategic");*
- *Acknowledge the ambitions of any emerging neighbourhood plans, ensuring Local Plan policies are carefully worded to avoid any future conflict with Neighbourhood Plan policies; and*
- *Leave 'space' for Neighbourhood Plans – some (non-strategic) issues may be more effectively dealt with through Neighbourhood Plans". (E Cambs Website).*

This is a far more positive and pro-active stance than is being taken by Wiltshire Council.

2.18 **Recent Government Statements and the Courts.**

The direction of travel for neighbourhood planning is clear – the Government supports it and considers that it has a firm place in the planning system. The Courts are also starting to interpret Planning Law and Regulations insofar as they relate to neighbourhood planning and these show an increasing tendency to support the early consideration (and attribution of weight to) emerging neighbourhood plans.

2.19 Take for example the case of Crane V Secretary of State for Communities and Local Government (2015) EWHC 425. In his judgement, on Monday 23rd February 2015, Mr Justice Lindblom stressed that Neighbourhood plans are seen by the Government as an important part of its "localism agenda". He quotes the Secretary of State in a decision letter dated 17 April 2014, which places great weight on the policies of a neighbourhood plan because of paragraphs 183 to 185 of the NPPF, which 'underlines the Government's commitment to neighbourhood planning as a process in which communities are able *"to develop a shared vision for their neighbourhood"* ..and to *"shape and direct sustainable development in their area"*

2.20 Justice Lindblom also quoted the "Core Planning Principle" set out in paragraph 17 of the NPPF that planning should *"be genuinely plan-led, empowering local people to shape their surroundings, with succinct local and neighbourhood plans setting out a positive vision for the future of the area"*

2.21 The effect of this and other judgements must be to emphasise that weight should be given earlier in the process to neighbourhood plans and in particular that communities should have power and influence in planning for their areas. What this means and indicates in relation to the case of the North Bradley and Market Lavington NDPs, is that the ability of a community to influence development in their area is being accorded much greater weight in the courts and by the Secretary of State than it is by Wiltshire Council.

2.22 Resources

It is understood that the Council is facing staffing problems and that resources for Plan production are tight. However this is not a good enough reason to ignore obligations under the law. Wiltshire Council in fact receives over £30,000 in Government support specifically ear-marked for each neighbourhood plan. However the money does not appear to be getting through and appears to be diverted onto other causes. Market Lavington and North Bradley Parish Councils therefore intend to submit a Freedom of Information Request to demonstrate how the funds have been used.



In North Bradley residents and volunteers have been working for free for almost two years to create their neighbourhood plan.

3.0 Comments on the Schedule

Comments on the Schedule are presented in two tables, one for Market Lavington and one for North Bradley, below. However by way of some general observations: The schedule of changes in the Briefing Note refers to neighbourhood plans hardly at all – and then only in connection with boundary changes. Both North Bradley and Market Lavington Parish Councils submitted extensive responses – yet these remain unacknowledged in the schedule. This seems indicative of Wiltshire Council’s general attitude to neighbourhood planning and is of very great concern.

3.1 Market Lavington

Market Lavington Parish Council has been developing a plan for over 3 years, and has attempted to maintain a dialogue with Wiltshire Council throughout NDP production. While this has been somewhat one-sided, a letter was received from Alistair Cunningham (Director, Economic Development and Planning) dated 3rd July 2017 that seemed to offer some hope;

‘If the Market Lavington NP can now be progressed quickly, it could very well overtake the draft Housing Site Allocations Plan and thereby remove the need for this Council to progress proposals at the village. As anticipated by legislation, national and local planning policy, we will of course continue to support the Steering Group in developing the NP. However, I ask that you, or your consultant, arrange to provide officers with a clear timetable for the next steps in preparing the document. This will help determine whether there is a need to amend the draft HSAP in due course’.

A timetable was promptly provided, but the sites suggested by the NDP have been ignored in the recent schedule of changes this commitment seems not to have been honoured.

3.2 Specific comments regarding to the Schedule are given in the table below. What is sought is, as implied in the letter from the Director, a ‘trading’ of sites, whereby the strategic need for Market Lavington is met through the sites of the NDP which have local support rather than through the imposed strategy of Wiltshire Council.

Reference	Description	Comment
PC 13	Claim that 1247 homes at Ashton park will not be built until after 2026	Evidence supporting this is weak and the statement should be revised. See North Bradley section below.
PC 18	Policy H1 proposes allocating: <ul style="list-style-type: none"> • Underhill Nursery (50 homes) • Southcliffe (15 homes) • East of Lavington School (15 homes) <p>In Market Lavington parish</p>	Underhill nursery is OPPOSED by the NDP and should be withdrawn in favour of sites that have community support. SEE APPENDIX 1. Southcliffe (15 homes) is allocated by the NDP and East of Lavington School has been re-allocated following Reg 14 Consultation at an increased 20 homes. In lieu of Underhill Nursery, the NDP allocates: Longfield(20 homes) Spin Hill (25 homes) The total number of homes proposed by the HSAP in Market Lavington is 80, and by the NDP 80. In order to deliver the Localism Agenda the NDP sites should replace those proposed by the HSAP.
PC 29	Policy H1	Underhill nursery is OPPOSED by the NDP and should be withdrawn

- 3.3 Market Lavington would also like to raise again their concerns at the poor standard of co-ordination and support provided by Wiltshire Council. For example there have been long periods of time when we have not had an allocated link officer. Eventually, following repeated requests for a Link Officer, Kate Sullivan (Planning Officer) was appointed. Kate made the effort to attend one of our Steering Group meetings, and has been very helpful in obtaining maps etc. however, by her own admission, we were the first Neighbourhood Plan she had worked with, and she struggled with initially getting to grips with the process, and often had to seek further advice before being able to answer any of our questions. The point we would like to make however is that Wiltshire Council receive in excess of £30,000 for each Neighbourhood Plan produced, very little of which it would appear is currently used to directly support Steering Groups, through what is a complex and highly regulated process.
- 3.4 In fact, there have been a number of occasions that Wiltshire Council have themselves caused delays in the progress of the plan. For instance, there was very little communication regarding the on-going submission of SHLAA sites, which resulted in new sites coming to light later in the process, which then needed to be included in consultation and site assessment analysis / the notification extremely late in the process that a 'Housing Needs Survey' was required – arranging this and waiting for the subsequent report caused a delay of approx. 7 months (we first approached Wiltshire Council 15/8/16 to request a survey be undertaken, subsequent report finally received 3/3/17).
- 3.5 That there is no attempt being made to co-ordinate the HSAP and the NDPs is very clear from the fact that our Link officer had prepared for us detailed maps of our sites, several months before the draft HSAP was published in summer 2017. If Wiltshire Council knew of our sites, why was no attempt made to work with us to produce a co-ordinated strategy? A map showing the NDP sites, which would deliver 80 homes – the same as the HSAP – is given in Appendix 2.



The Market Lavington Community has spent hundreds of hours working on the NDP.

3.6 North Bradley

The North Bradley DPD has in fact been developing since November 2016. Early community engagement took place in February and March 2017 and sites consultation took place in spring 2018. After conducting a considerable amount of research and gathering community views, Regulation 14 consultation for the NDP is now imminent and the NDP has been submitted for SEA and HRA Screening. The sites proposed amount to some 90 homes and are given in Appendix 3.

Reference		
PC 13	Claim that 1247 homes at Ashton park will not be built until after 2026	Evidence supporting this is weak and the statement should be revised. See North Bradley section below.
PC 18	<p>The original Policy H2 allocates within the NDP Area: Elm Grove Farm (200 homes) Land off WHBP (150 homes) Southwick Court (180 homes)</p> <p>Number of homes have been raised and this should be reversed – see below.</p>	<p>NDP Opposes Land off WHBP and this allocation should be dropped in favour of the overall NDP plan which has community support.</p> <p>This is as follows: The NDP accepts Elm Grove Farm and Southwick Court.</p> <p>In lieu of WHBP the NDP now allocates:</p> <p>The Paddock (8 homes) 54 Woodmarsh (25) Park Farm (35 homes) Land off Westbury Road, Yarnbrook (22) Total 90</p> <p>The original HSAP housing numbers in North Bradley parish were 530: If the NDP strategy is adopted this would (using original HSAP figures) fall to:</p> <p>Elm Grove Farm (200) Southwick Court (180) NDP sites as above (90)</p> <p>Total 470 – but see below.</p>
PC33	Elm Grove Farm has been increased to 250 homes.	Object – case for this much housing is weak – see below. The figures should revert to those in the original HSAP
PC38/ 39	White Horse Business park reduced to 19.96 ha but housing numbers raised to 225	Object – case for this much housing is weak see- below. The figures should revert to those in the original HSAP.

- 3.7 It can be seen from the above that the North Bradley NDP allocates less housing than that advocated by the HSAP. Government policy states that an NDP cannot propose less development than the development plan. However;
- the HSAP is not yet part of the development plan and the possibility of replacing the proposed site at White Horse Business Park with the NDP sites is still an open possibility.
 - the case of need for housing put forward by the HSAP is flawed for the following reasons:
- 3.8 While the DPD states that there will be a shortfall of 1247 homes, this is disputed. The figure is based on the un-verifiable assumption that the Ashton Park will be much slower in delivery than anticipated (many homes not being delivered until after 2026) and that sites for additional homes therefore need to be identified to avoid a shortfall in housing land supply later in the plan period.
- 3.9 The assumption is presented as fact, however, it relies, according to the HSAP evidence base, simply on the word of the developers who supplied this information (an intention not to develop all of the site until after 2026) to the LPA. An intention or 'finger in the air' estimate of this type cannot be considered to be reliable. The developers may have a vested interest in encouraging the belief that delivery will be slow (so as to get other land allocated in the DPD). They are certainly not equipped with a crystal ball and cannot therefore accurately predict delivery ahead.
- 3.10 This is particularly relevant at the present time, which is one of great economic uncertainty, as the UK struggles with negotiations on Brexit. The share prices of housebuilders have been hard hit by Brexit (making it more difficult for them to raise finance for new housing projects) and many have announced that they are putting new projects on hold. Yet recent announcements by opposition parties in the UK suggest that Brexit, least of all a Hard Brexit, may not even happen. The truth is no one knows how Brexit will pan out, yet the DPD would have us believe that housing developers can accurately predict delivery for up to 9 years ahead! This seems very unlikely, if not impossible.
- 3.11 We then have to consider what would happen should the developers simply change their minds if circumstances change. This is not at all unlikely; should the Brexit logjam be suddenly released (for example if an agreement was reached to stay in the EU or at least the customs union) then the circumstances and attractiveness of development at Ashton Park could change dramatically and almost overnight. This would pump 1000 homes into the housing supply far earlier than the DPD predicts.
- iii. It is likely that the NDP will allocate more sites in its first review (3 years).
 - iv. Windfalls are not likely to provide a large number of homes, but some will be delivered on top of the NDP allocations.
 - v. The parish council is prepared to discuss site numbers at Park Farm and at the Yarnbrook site if a larger number would be helpful.
 - iv. The NDP contains other pro-development policies (such as a general housing policy)

- 3.12 The main reason for opposing the proposed site off A 363 at White Horse Business Park is because of the damage this will do to the landscape setting of North Bradley. This has been clearly demonstrated in the Landscape and Visual Analysis Report (that Wiltshire Council has been sent) - Yet this is completely ignored – including by the HSAP SA – a potentially fatal omission for the HSAP. Community engagement revealed a strong desire to preserve the identity and setting of North Bradley village and to prevent it from losing its identity as a suburb of the principal settlement. See Appendix 4 for maps showing the proposed site and proposed protected area.
- 3.13 The WHBP allocation must also therefore be opposed because it conflicts with Core Policy 29. A landscape protection policy in the NDP takes forward paragraph 5.150 of Core Policy 29 the Wiltshire Core Strategy (WCS). This encourages the community to develop a policy for the rural setting ‘gap’ between the village and Trowbridge in a neighbourhood plan.

‘It is recognised that the villages surrounding Trowbridge, particularly Hilperton, Southwick North Bradley and West Ashton, have separate and distinct identities as villages. Open countryside should be maintained to protect the character and identity of these villages as separate communities. The local communities may wish to consider this matter in more detail in any future community-led neighbourhood planning.’

However, now that the community has accepted their invitation and done this, Wiltshire Council seems to want to ride rough-shod over the result.

- 3.14 While development must take place to provide necessary housing, this should not be at the expense of destroying character and sense of place. If repeated across Wiltshire this would lead to an anonymous sprawl with everywhere becoming simply ‘somewhere on the way to somewhere else’. It is the individual character of settlements that residents value and which underpin the county’s tourism and leisure industries. Development which destroys this is not sustainable since it involves handing on to our descendants something worse than what we ourselves inherited.

3.15 **Defective Sustainability Appraisal**

Sustainability is something that was considered for the HSAP by the HSAP’s SA report (dated June 2017). In the view of the PC, this report is flawed and the HSAP is therefore unsound.

Objective 7 of the SA was *‘Conserve and enhance the character and quality of Wiltshire’s rural and urban landscapes, maintaining and strengthening local distinctiveness and sense of place.’*

- 3.16 Objective 7 should have enabled the plan makers to determine that the site off White Horse Business park (H 2.2) would be harmful to the setting of North Bradley. It is hard to see how they could have avoided this conclusion because paragraph 5.150 of Wiltshire Council's own Core Strategy Core Policy 29, clearly establishes the importance of this area. However, in Section 7.10.74 of the SA itself (regarding this site) we find no mention at all of the impact on the setting of North Bradley at all, except for a statement that:

'The site is situated to the immediate east of North Bradley village and west of the White Horse Business Park. The land comprises a series of agricultural fields / informal open space and, as such, would not maximise the use of previously developed land'.

- 3.17 The score given for this site against Sustainability Objective 7 records only minor adverse effects on landscape. This completely ignores the sensitivity of the area in landscape setting terms as established by WCS paragraph 5.150, to which it fails to refer, and is clearly wrong in terms of actual impact as is proven by the Landscape Setting Report commissioned for the NDP (See map extract as Appendix 4). The latter clearly demonstrates the importance of retaining this area. That the SA could have made such a fundamental mistakes brings its entire credibility into question. Clearly, the crucial importance of the area as a setting for North Bradley was not considered and the SA is therefore flawed and the policies based on it are unsound.

4.0 **Conclusion**

North Bradley and Market Lavington Parish Councils ('the Parish Councils') fully accept the need to deliver strategic housing for Wiltshire and are committed to neighbourhood plans which aim to do just this. However we have a choice in the County about how this is done; through traditional top-down planning by unelected officers or with the help and support of the community they serve via neighbourhood plans.

- 4.1 The Parish Councils do not desire conflict but harmony between the older traditional and newer community based plans. The carefully crafted neighbourhood plans present alternative strategies, with similar aims to the HSAP and are worthy of more consideration than they have received so far.
- 4.2 The proposal from both Parish Councils is therefore that a meeting should take place and that a joint approach should be adopted whereby strategic need is met first by neighbourhood plans sites and only where this is insufficient should strategic sites be imposed.
- 4.3 If this is not done then irreparable harm will be done to the reputation of Wiltshire Council and neighbourhood planning in the county. Public money will be wasted at a time when it is in short supply. The conflict will be carried over into the EIP for the HSAP and into the wider political and public domains and this will delay the delivery of much needed housing. These are consequences that the Parish Councils sincerely want to avoid.

North Bradley Parish Council NDP Steering Group
Market Lavington Parish Council NDP Steering Group

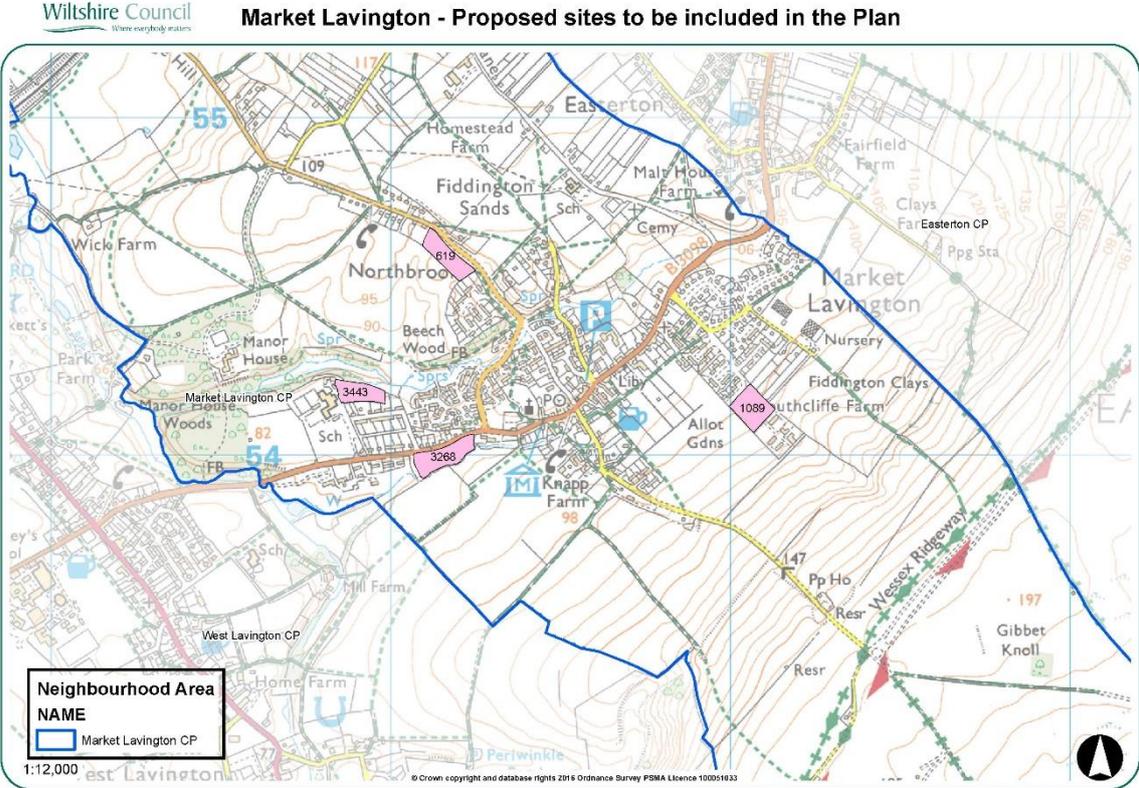
31st May 2018

APPENDIX 1:

Site name / SHLAA no.	Number of Dwellings NDP	Number of Dwellings DPD	Notes / Reasons
Underhill Nursery *	N/A	50	<p>This site was considered and was rejected for the following reasons:</p> <ul style="list-style-type: none"> • It is larger than the preferred size expressed in community engagement and tends to undermine the agreed strategy of a number of smaller sites located around the village (See Appendix 6). • The location is at the end of the village that suffers the worst congestion problems particularly bad pinch point, and mini-roundabout with limited vision – even if access were improved this would create a lot more traffic at exactly the worst location, especially on the High Street, and in Fiddington Clay Road. • The loss would represent a loss of employment possibilities which the NDP is trying to encourage. We would prefer the site to be used for agriculture, horticulture or suitable rural businesses. • The site is prone to bad flooding, being located at the bottom of a hill. This problem is likely to grow due to climate change. Development could add to the problem. • Soil contamination is likely to be present after horticultural use • Alternative sites are available (and proposed) in the NDP which adequately provide for the sustainable growth of Market Lavington <p>If not removed, this site proposal will effectively undermine the existing neighbourhood plan, which seeks to ‘plan by consent’ – giving local people a direct say in how and where Market Lavington grows. If the site is imposed, regardless of the NDP, then it could destroy confidence in neighbourhood planning and Localism generally.</p> <p>The Parish Council therefore respectfully requests that this site be dropped from the DPD.</p>

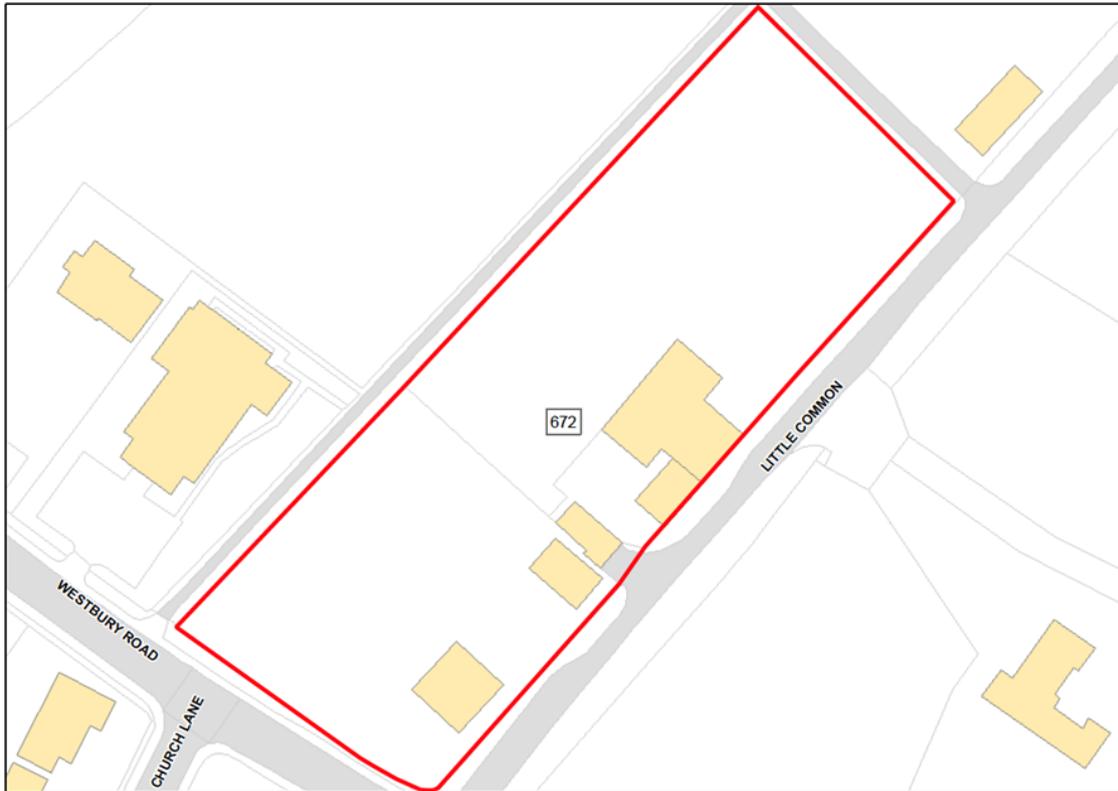
* also known as Fiddington Nursery

Appendix 2: Market Lavington NDP Proposed Sites

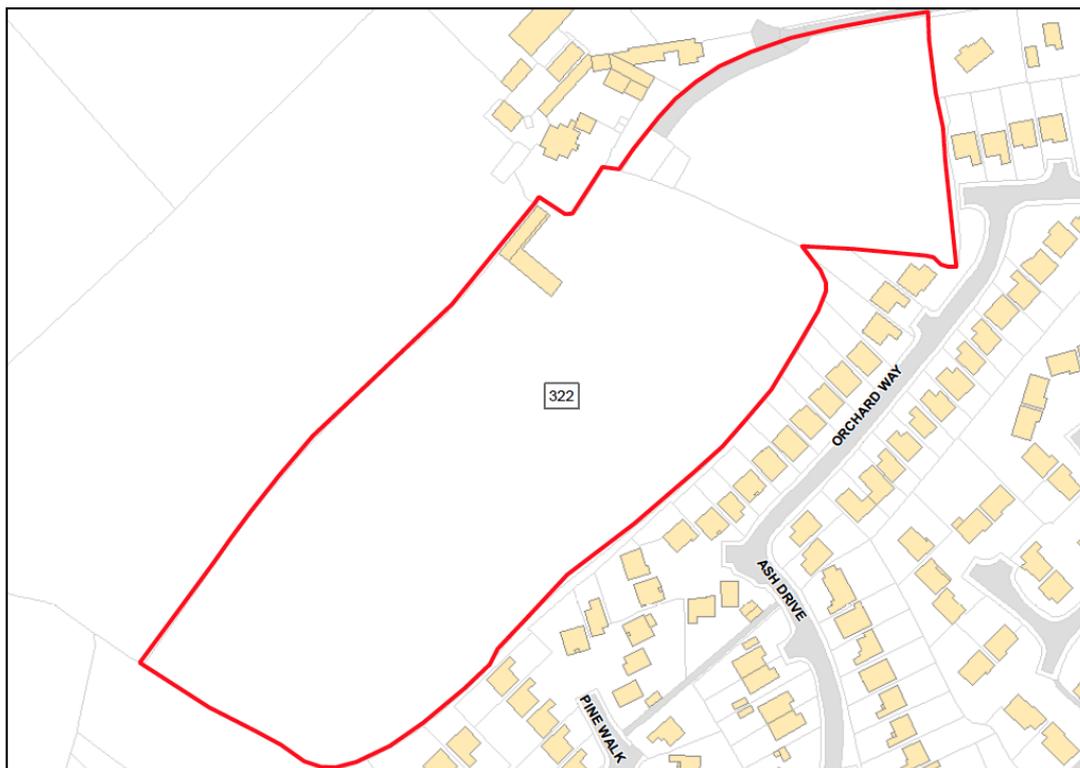


Appendix 3: North Bradley NDP Sites

The Paddock, Little Common Lane, (SHELAA 672)

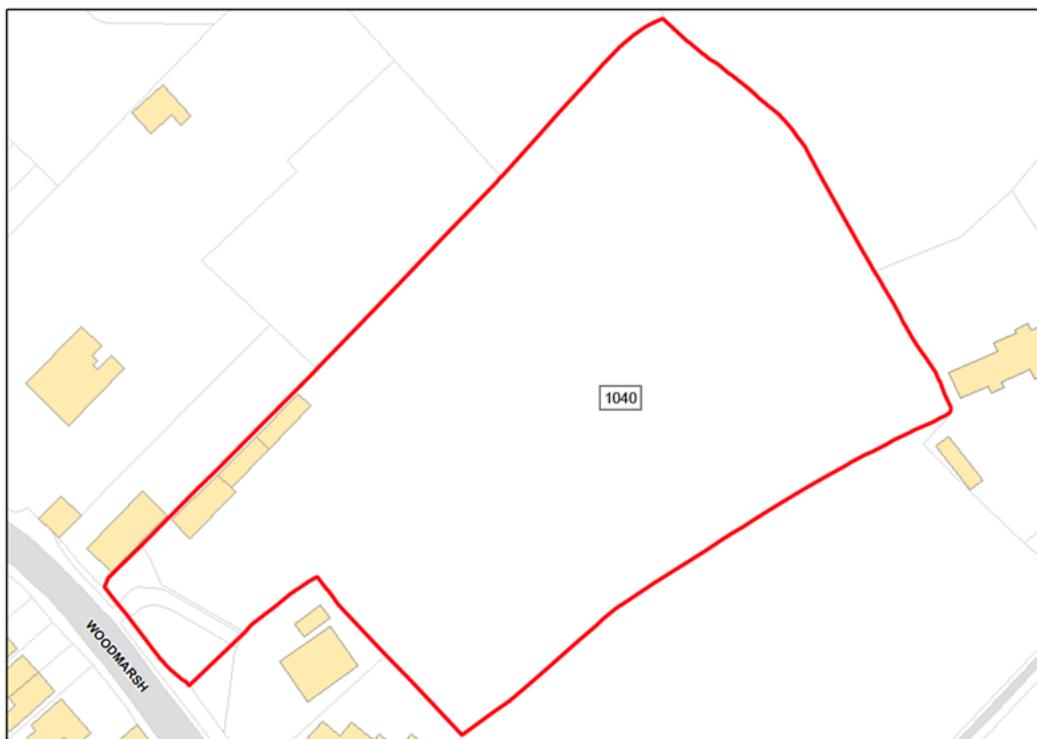


Park Farm, SHELAA 322

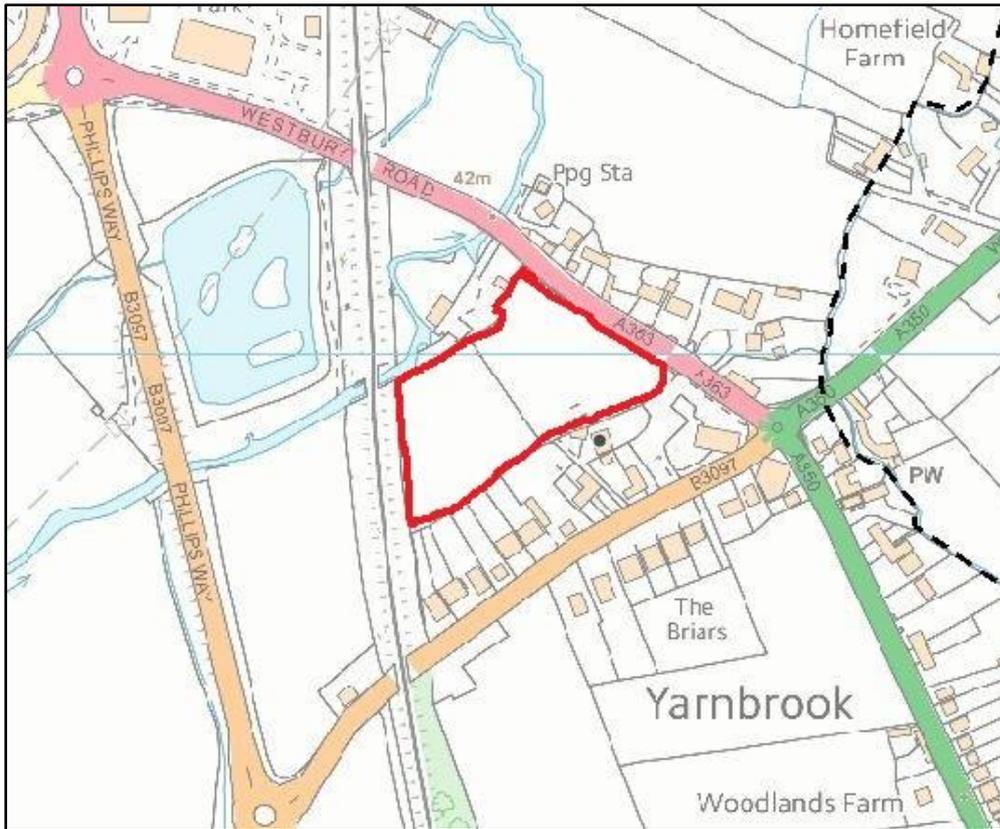


54

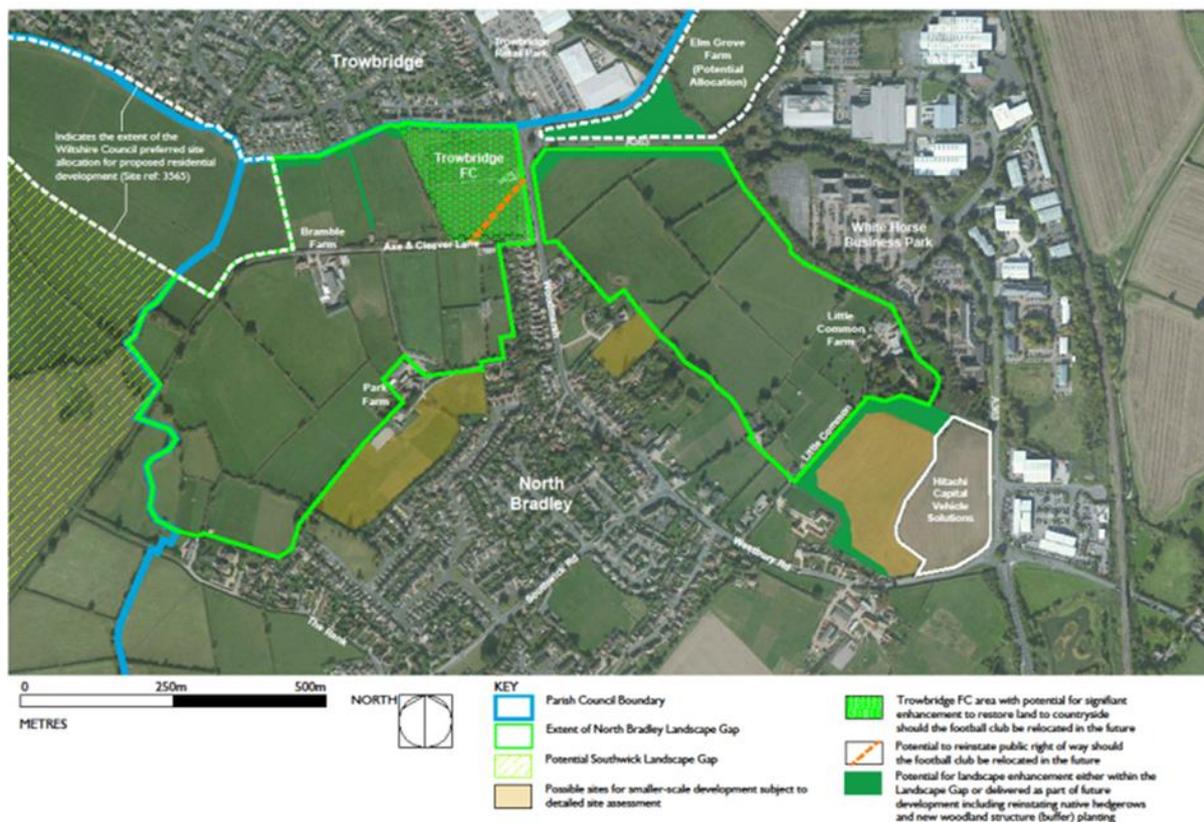
Woodmarsh, SHELAA 1040



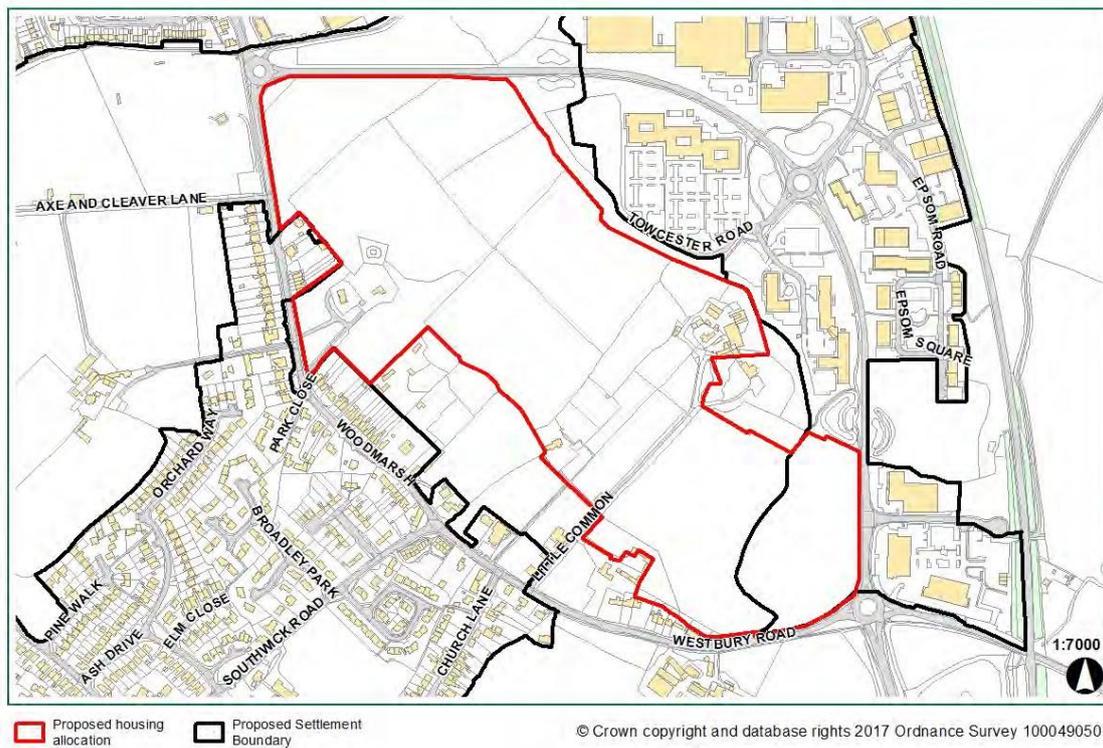
Land off Westbury Road, Yarnbrook



Appendix 4: Landscape Protection Area proposed for North Bradley



Proposed HSAP site H 2.2 that will destroy the landscape setting of North Bradley.



From: [Shelley Parker](#)
To: [Spatial Planning Policy](#)
Subject: Draft Wiltshire Housing Site Allocations Plan - Consultation *REF: 10 - printed*
Date: 11 June 2018 08:58:39

Dear Spatial Planning Team

Draft Wiltshire Housing Site Allocations Plan - Consultation - Marlborough Town Council

At its Planning Committee meeting on 29 May, Marlborough Town Council noted the changes to the Plan and commented that the Settlement Boundary may still be changed through the Neighbourhood Plan process currently being taken forward through the Marlborough Area Neighbourhood Plan Steering Group.

With best regards

Shelley

Shelley Parker
Town Clerk
Marlborough Town Council
01672 512487
07931 996632
townclerk@marlborough-tc.gov.uk
www.marlborough-tc.gov.uk

From: [Warminster Town Council](#)
To: [Spatial Planning Policy](#)
Subject: re-comments from Warminster Town Council *REF: 10 - printed*
Date: 11 June 2018 09:28:14
Attachments: [image001.gif](#)
[image002.gif](#)
[image004.jpg](#)
[2018.06.01 Settlement Boundary.pdf](#)
[WHSA PSCONS02 Representation Form June 2017 \(1\).docx](#)

Good morning

Thank you for the opportunity to comment further on the Wiltshire Housing Site Allocations Plan. We reiterate our previous comments made on 20th September 2017. Our only comment is to remove item No.24 from the list as we strongly oppose any change to the Settlement Boundary in the Grovelands Area.

Please see attached original comments

Many thanks

Judith

Warminster Town Council
Warminster Civic Centre
Sambourne Road
Warminster
Wilts
BA12 8LB

Tel 01985 214847

Email: admin@warminster-tc.gov.uk

Website: www.warminster-tc.gov.uk



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Wiltshire Housing Site Allocations Plan

Pre-submission Draft Representation Form and Notes

Ref: (For official use only)

Please return to Wiltshire Council, by 5pm on Friday 22nd September 2017.

By post to: Spatial Planning, Economic Development and Planning, Wiltshire Council,
County Hall, Bythesea Road, Trowbridge, Wiltshire, BA14 8JN.

By e-mail to: spatialplanningpolicy@wiltshire.gov.uk

Tel: 01225 713223

Website: <http://wiltshire.gov.uk/wiltshsgsiteallocationsplan>

This form has two parts:

Part A – Personal details

Part B – Your representation(s). Please use a separate sheet for each representation.

Part A – Personal details

*if an agent is appointed, please fill in your Title, Name and Organisation but the full contact details of the agent must be completed.

	1. Personal details	2. Agent's details (if applicable)*
Title	Mrs	
First name	Fiona	
Last name	Fox	
Job title (where relevant)	Town Clerk	
Organisation (where relevant)	Warminster Town Council	
Address Line 1	Warminster Civic Centre	
Address Line 2	Sambourne Road	
Address Line 3	Warminster	
Address Line 4		
Postcode	BA12 8LB	
Telephone Number	01985 214847	
Email Address	townclerk@warminster-tc.gov.uk	

Part B – Please use a separate sheet for each representation

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/ justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations based on the original representation to the pre-submission draft consultation.

After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/ she identifies for examination.

Name or organisation:	Warminster Town Council
-----------------------	-------------------------

3. To which part of the Wiltshire Housing Site Allocations Plan does this representation relate?

Policy: H2.7	Paragraph: 5.88	Table:	Figure: 5.11
Site: East of the Dene		Other:	

4. Do you consider the Wiltshire Housing Site Allocations Plan is:

(i) Legally compliant	Yes:			No:	
(ii) Sound	Yes:			No:	X

*If you have entered **No** to 4 (ii), please continue to Q5. In all other circumstances, please go to Question 6.*

5. Do you consider the Wiltshire Housing Site Allocations Plan is **unsound** because it is not:

(1) Positively prepared	
(2) Justified	X
(3) Effective	
(4) Consistent with national policy	

6. Please give details of why you consider the Wiltshire Housing Site Allocations Plan is not legally compliant or unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Wiltshire Housing Site Allocations Plan, please also use this box to set out your comments.

The Town Council feels this site meets the aspirations of the Warminster Neighbourhood Plan (section 4.2, third row), which aspires to: "A spread of new developments around the town to avoid imbalance caused by significant developments in any one area." However, they believe this should not be brought forward before 2026, the period of the Neighbourhood Plan and Core Strategy, as the sites already allocated in the west should be developed first. This site could be included when considering the town's future planning needs post 2026 when additional sites may need to be identified.

(Continue on a separate sheet/ expand box if necessary)

7. Please set out what change(s) you consider necessary to make the Wiltshire Housing Site Allocations Plan legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the Wiltshire Housing Site

Allocations Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any proposal or text. Please be as precise as possible.

Defer any plans for this site until after the period of the Wiltshire Core Strategy and Warminster Neighbourhood Plan.

(Continue on a separate sheet/ expand box if necessary)

8. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

	No, I do not wish to participate at the oral examination	x	Yes, I wish to participate at the oral examination
--	--	---	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Councillor Tony Nicklin has been nominated to speak on behalf of the Council and the Neighbourhood Plan Policy Review Group.

(Continue on a separate sheet/ expand box if necessary)

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:	Fiona Fox	Date:	20/09/2017
------------	-----------	-------	------------

Part B – Please use a separate sheet for each representation

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/ justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations based on the original representation to the pre-submission draft consultation.

After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/ she identifies for examination.

Name or organisation:	Warminster Town Council
-----------------------	-------------------------

3. To which part of the Wiltshire Housing Site Allocations Plan does this representation relate?

Policy: H2.8	Paragraph: 5.95, 5.96	Table:	Figure: 5.12
Site: Bore Hill Farm		Other:	

4. Do you consider the Wiltshire Housing Site Allocations Plan is:

(i) Legally compliant	Yes:			No:	
(ii) Sound	Yes:			No:	X
If you have entered No to 4 (ii), please continue to Q5. In all other circumstances, please go to Question 6.					

5. Do you consider the Wiltshire Housing Site Allocations Plan is **unsound** because it is not:

(1) Positively prepared	
(2) Justified	X
(3) Effective	
(4) Consistent with national policy	

6. Please give details of why you consider the Wiltshire Housing Site Allocations Plan is not legally compliant or unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Wiltshire Housing Site Allocations Plan, please also use this box to set out your comments.

The Town Council feels this site is unsuitable for housing due to its proximity to the biodigester. It would destroy any buffer to the bypass and the air quality would be an issue. This would not fit with Neighbourhood Plan policy L1 which includes 'Maintains a quality of life'. The site is inappropriate for residential properties and lends itself to commercial use.

(Continue on a separate sheet/ expand box if necessary)

7. Please set out what change(s) you consider necessary to make the Wiltshire Housing Site Allocations Plan legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the Wiltshire Housing Site

Allocations Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any proposal or text. Please be as precise as possible.

Remove this site for housing allocation.

(Continue on a separate sheet/ expand box if necessary)

8. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

	No, I do not wish to participate at the oral examination	x	Yes, I wish to participate at the oral examination
--	--	---	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Councillor Tony Nicklin has been nominated to speak on behalf of the Council and the Neighbourhood Plan Policy Review Group.

(Continue on a separate sheet/ expand box if necessary)

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:	Fiona Fox	Date:	20/09/2017
------------	-----------	-------	------------

Part B – Please use a separate sheet for each representation

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/ justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations based on the original representation to the pre-submission draft consultation.

After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/ she identifies for examination.

Name or organisation:	Warminster Town Council
-----------------------	-------------------------

3. To which part of the Wiltshire Housing Site Allocations Plan does this representation relate?

Policy:	Paragraph:	Table: 6.2	Figure:
Site:		Other: Proposed amendments to the settlement boundary for Warminster	

4. Do you consider the Wiltshire Housing Site Allocations Plan is:

(i) Legally compliant	Yes:		No:	
(ii) Sound	Yes:		No:	X
<i>If you have entered No to 4 (ii), please continue to Q5. In all other circumstances, please go to Question 6.</i>				

5. Do you consider the Wiltshire Housing Site Allocations Plan is **unsound** because it is not:

(1) Positively prepared	
(2) Justified	X
(3) Effective	
(4) Consistent with national policy	

6. Please give details of why you consider the Wiltshire Housing Site Allocations Plan is not legally compliant or unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Wiltshire Housing Site Allocations Plan, please also use this box to set out your comments.

<ol style="list-style-type: none"> The proposed lines now shown on the map, page 28 of the WCATP, do not show the current planning status accurately. They exclude the Core Strategy, the proposed SHLAA sites referred to in our earlier comments, and extant planning and completed permissions. The omission of the Core Strategy boundaries might prejudice the Appendix D Assessment Criteria, which are the basis for many of the SHLAA site selection process decisions. These could declare the process flawed, if the settlement boundaries are not correct, in particular the exclusion criteria set out in table D2 stage 2A questions 1 & 2. Further issues occur when assessing any SHLAA site on the basis of its separation from the boundary, or not being adjacent to it (see sites 2091, 1007 and 1030 for example) The new Core Strategy Areas represents a considerable expansion of the Town and Settlement Boundary, and even if the exact line cannot be currently defined (due to house positions not being agreed) then due regard must be made as if the boundary line is the same as the Core Strategy's allowance. This line can then be tightened up later.

4. Refer to the schedule of specific comments in section 7 below, based upon the same grid reference table A1 on page 29 of the WCATP. For convenience we have started at the same grid reference point G9, G10. All proposals in the WCATP table are accepted, these are:

- excluding existing recreational spaces
- following curtilages of existing properties
- excluding physical features such as roads, e.g. transferring the existing line to the other side of the road
- including newly built residential and commercial developments
- Including existing properties physically related but not necessarily directly attached to the existing settlement
- Excluding land more closely related to the countryside

We have also added our further comments where the principles used in the table have not been consistent throughout the boundary review.

We would invite WC to meet with WTC and review the proposals and discuss and assess each comment individually with larger scale drawings.

(Continue on a separate sheet/expand box if necessary)

7. Please set out what change(s) you consider necessary to make the Wiltshire Housing Site Allocations Plan legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the Wiltshire Housing Site Allocations Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any proposal or text. Please be as precise as possible.

ITEM NO.	MAP GRID REFERENCE	PROPOSED AMENDMENT OR CORRECTION
1	G9, G10	Agree with exclusion of the Warminster Common and Allotments.
2	F11, G11	Refer to section 1 of our response. We do NOT accept the use of SHLAA sites 1032 and 302 for residential housing.
3	G11 AND 12	The existing commercial Biogas site should be included as a detached site including its extant planning for commercial employment expansion.
4	J10	The newly developed extension to Damask Way should be included within the boundary.
5	I8	The proposed line should include the Football Club car park and clubhouse within the new green space.
6	N9	The small area alongside Boreham Road and rear of Rock Lane houses is currently subject to a planning application for which WTC has recommended refusal, but not yet determined by WC.
7	09 & 010	The SHLAA site refer 304 recently approved by Secretary of State and included in the WCATP should be included linked to the existing Boreham Road properties.
8	010	The newly built housing development (ex. Bus Depot) should be included as a detached site.
9	P8 & P9	The SHLAA site ref 603 included in the WCATP (accepted in section 1 of this response) should be included and attached to the existing line.
10	05	Why is this MOD building included with a narrow access line? Why has this MOD area been included, for the first time, together with all of the military barracks and ABRO workshops? This area has a barbed wire fence line and is not available to the public.
11	M5 to 03	This area is all military residential areas and accessible to the public, hence accepted as a detached site.
12	L3 to M4	This area is also an extensive military residential area and accessible to the public, and should also therefore be accepted as a detached site.
13	N4 to Q1	All the military units (inc. residential housing) are much more extensive over the grid N4 to Q1, and we question what policy or logic has been applied in order to understand why only part of this considerable area has been identified for inclusion with the new settlement boundary and others not included.
14	K4 & K3	The inclusion of the residential units along Elm Hill has been accepted, but the policy has not been applied consistently around the town boundary on similar properties.
15	G2, H2 & H3	The far north east end of the Warminster Business Park (access from Furnax Lane) goes right up to the railway lines, and is mostly built on. These are existing employment areas.

16	G4	This site has also planning permission, and is part of the Warminster Business Park.
17	H5	We recommend including the Minster Church car park with the churchyard boundary.
18	G5 & H5	We believe that it would be beneficial to include the Warminster School main grounds including the pool, workshops and Furneaux House as well as the hard sports courts within the new boundary. This would, however, exclude the green area sports field and pitches.
19	G4	Include the perimeter of the recently approved Traveller settlement at the corner of Bath Road and Coldharbour Lane.
20	F3 & G4	Include properties known as the White House and 109 Bath Road to be consistent with the policy of existing "built development physically related to the settlement". These properties are to be fully enclosed by the Core Strategy West Urban Extension.
21	E/F3 to B/C9	The new Wiltshire Core Strategy – Warminster West Urban Extension (WWUE) extends from the Bath Road, grid F3 to B8, on the north side of Victoria Road. This settlement boundary extension will need to be added at some time in the future when the full detailed site layout is approved. Noting that there will be extensive use of buffer zones along the A36 as well as internal to the new site.
22	B8 & D9	The southern side of Victoria Road contains the remaining part of the WWUE, and consists of three separate sites: <ul style="list-style-type: none"> - The Redrow site (known as Tascroft Rise) is already with full approval and under construction. The new boundary can therefore be extended from St Andrews Road and Folly Lane. - The Persimmon Site (known as Bugley Farm) has not yet been approved, but an application is under review. The site will enclose the Bugley Barton Farm House which therefore should be included within the new boundary. - The remaining site (known as Folly Farm) does not as yet have any planning proposals, but remains within the designated WWUE.
23	C9	The Rugby Club and grounds will be surrounded by the WWUE, but should be excluded from the settlement.
24	E6 to G5	This area known as SHLAA 1007 Grovelands is subject to a current planning application (exception site), with 17 acres set aside as open space. If this site is approved the settlement boundary will need to be adjusted accordingly.

(Continue on a separate sheet/ expand box if necessary)

8. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

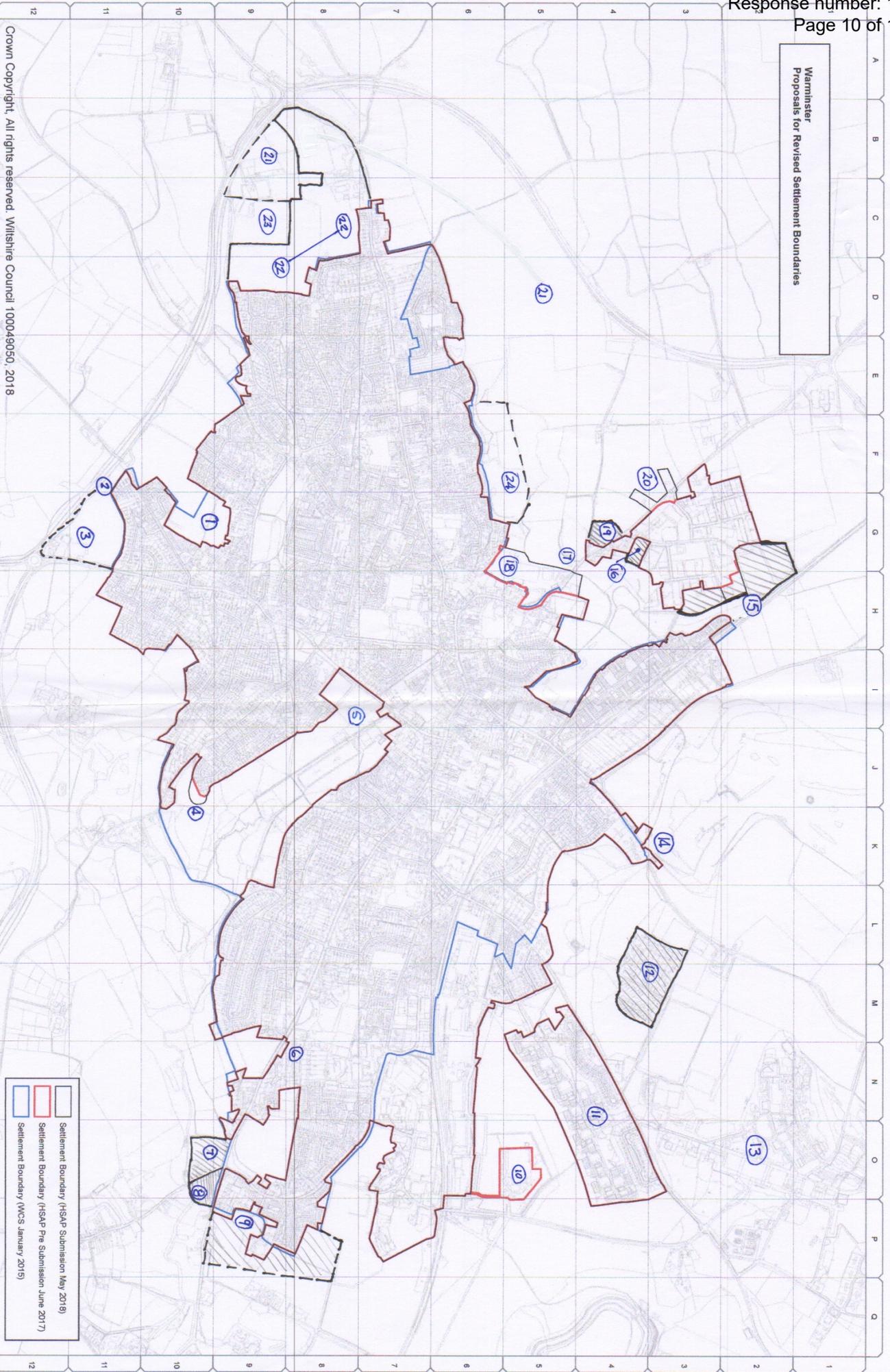
No , I do not wish to participate at the oral examination	x	Yes , I wish to participate at the oral examination
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9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

<p>Councillor Tony Nicklin has been nominated to speak on behalf of the Council and the Neighbourhood Plan Policy Review Group.</p> <p style="text-align: right;"><i>(Continue on a separate sheet/ expand box if necessary)</i></p> <p>Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.</p>

Signature:	Fiona Fox	Date:	20/09/2017
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Warrminster
Proposals for Revised Settlement Boundaries



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

From: [Shelley Parker](#)
To: [Spatial Planning Policy](#)
Subject: Wiltshire Housing Site Allocations Plan - MANP *REF: 11 - printed*
Date: 11 June 2018 10:12:49

Dear Spatial Planning Team

Consultation: Wiltshire Housing Site Allocations Plan - Marlborough Area Neighbourhood Plan (MANP)

At their meeting on 31st May, members of the Marlborough Area Neighbourhood Plan Steering Group considered a response to the above consultation. MANP would like to make the following comments:

- As raised in the 2017 consultation, it was not clear why Manton, part of the parish of Marlborough rather than a standalone village, was not included within the settlement boundary for Marlborough.
- Also raised in the 2017 consultation, Mildenhall is again not listed as a village in the table at 2.3 of the *Community Area Topic Paper for Marlborough - 2018*. (Mildenhall is not listed anywhere in the current WCS either)
- The Settlement Boundary may change through the Neighbourhood Plan process

With best regards

Shelley

Shelley Parker

Town Clerk (on behalf of MANP)

Marlborough Town Council

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Laverstock & Ford Parish Council

Incorporating Hampton Park & Old Sarum

3 Pilgrims Way, Laverstock, Salisbury, SP1 1RZ

Tel: 01722 411847

Email: parish-clerk@laverstock-ford.co.uk

Spatial Planning
Economic Development & Planning
Wiltshire Council
County Hall
Bythesea Road
Trowbridge
Wiltshire
BA14 8JN

11 June 2018

Dear Sir or Madam

Consultation on the Proposed Changes to the Wiltshire Housing Site Allocations Plan – Draft Laverstock and Ford Parish Council Response

Laverstock and Ford Parish Council are unable to provide a formal response until it has been agreed by resolution at its next Parish Council meeting on 18 June 2018. However, it understands that it is acceptable to provide a draft response prior to 12 noon Monday 11 June 2018 as an interim measure pending a resolution on 18 June. The Laverstock and Ford draft response identifies 2 objections.

Inclusion of OM003 The Yard, Hampton Park.

The Parish has been subjected to some 2600 units being either built, or planning permission granted to be built, over the last 15 years. Furthermore, the Parish Council supported a planning application for development at Longhedge for 673 dwellings – 223 more than called for in the Core Strategy. The Parish Council, therefore, believes that it is un-reasonable to consider any further development within the Parish boundaries and is disappointed to note the inclusion of OM003 The Yard, Hampton Park in the May 2018 amendment. The Parish Council objects to its inclusion.

Settlement Boundary in the vicinity of Old Sarum and Longhedge.

The developed areas both north and south of The Portway are identified as part of the Salisbury Settlement Area. The Council objected in its submission to the Pre-submission Draft Housing Site Allocation Plan in September 2017 to the inclusion of the Old Sarum area within the Salisbury Settlement Area. It is felt that this cannot be correct as this settlement falls both within the Parish of Laverstock and Ford as well as the Southern

Wiltshire Community Area. Old Sarum forms an 'island' which is well separated from the main body of Salisbury Settlement Area and, therefore, it is not logical for it to form part of this.

The recent proposed changes now include Longhedge in this 'island'. This overall settlement should be identified within the Southern Wiltshire Community Area Topic paper. The document already identifies boundaries for 7 separate settlements and an Old Sarum/Longhedge settlement should form the 8th. Therefore, the Council objects to both Old Sarum and Longhedge being included within the Salisbury Settlement Area.

Corrections to Appendix D to the Salisbury Community Area Topic Paper.

The Council is pleased to note that the errors in the data for 2 SHLAAs (S119 Old Sarum and 3381 Land at Manor Farm Road, Ford), which were identified by the Council in its September 2017 submission, have now been corrected.

Yours faithfully

Andrew Prince
Clerk to the Parish of Laverstock and Ford

RESPONSE FROM HILPERTON PARISH COUNCIL TO WILTSHIRE COUNCIL'S REVISED HOUSING SITE ALLOCATION PLAN

Hilperton Parish Council congratulates Trowbridge Town Council for its work on its Housing Site Allocations Plan Alternative Submission.

The Parish Council endorses the Resolutions agreed by the Town Council at an Extraordinary meeting of its Policy and Resources Committee held on the 5th June, 2018, and especially E, F, G and I.

The Parish Council wishes to formally object to the following suggested Wiltshire Council allocations as they are clearly contrary to Wiltshire Council's adopted Core Strategy, specially paragraph 5.150 on page 181 reproduced below:-

It is recognised that the villages surrounding Trowbridge - particularly Hilperton, Southwick, North Bradley and West Ashton - have separate and distinct identities as villages. Open countryside should be maintained to protect the character and identity of these villages as separate communities. The local communities may wish to consider this matter in more detail in any future community-led neighbourhood planning.

263/297/293 (part) – Hilperton Gap, located in Hilperton parish. Hilperton Parish Council policy is to oppose development in the Hilperton Gap in order to prevent its coalescence with Trowbridge.

298 North Bradley Gap, located in North Bradley parish..

3565 Southwick Court Gap, located in Southwick and North Bradley parishes.

None of these suggestions would maintain open countryside between the town and the villages, nor would they protect the character and identity of these villages as separate communities.

Furthermore, Hilperton Parish Council is confused as to why Wiltshire Council has now 'recommended' that 355 houses could be constructed on the land west of Elizabeth Way. This increase from the original suggestion of 205 (which allowed for landscaping etc.) would indicate that the spatial planning team at Wiltshire Council is far from competent in seeking suitable housing sites in the Trowbridge Community Area and too easily changes its stance to suit the suggestions of developers.

**Resolved by Hilperton Parish Council
at an Extraordinary Parish Council
Meeting dated 7th June, 2018**

Revised Salisbury Transport Strategy Refresh

Thank you for the opportunity to respond to the Salisbury Transport Strategy Refresh.

Salisbury City Council was disappointed to see that previous representations made to Wiltshire Council in relation to earlier iterations of the Salisbury Transport Strategy appear to have been ignored; namely relating to the need for an integrated transport hub for rail and bus users and improved light rail access from Salisbury to Wilton, Porton (particularly in light of increased Government investment) and Amesbury (see Appendix) as well as inconsistencies regarding the housing allocation and the environmental impact this will have on routes within the city.

SCC has the following requirements to ensure that the Salisbury Transport Strategy Refresh is meaningful and fit for both the long and short term viability of Salisbury.

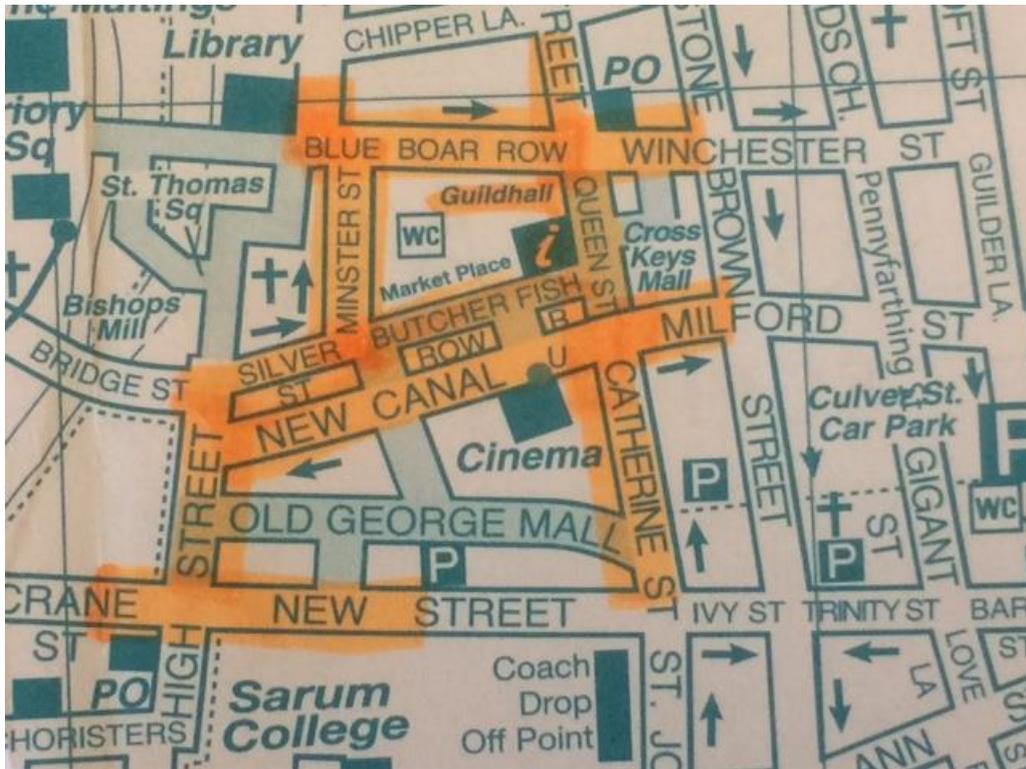
1 Churchfields

Whilst SCC note that the possible redevelopment of the Churchfields Industrial Estate has been deferred until after 2026 as referred to in Appendix 2 of the Wiltshire Housing Site Allocations PC16, it is recommended that the housing allocation should read the same in both documents. SCC remains extremely concerned that heavy goods vehicles will continue to travel through Salisbury and would ask that a provision made to move the HGV MoT site away from the Churchfields area, and that height and weight restrictions be applied to Crane Bridge Road and other key routes into the city during peak traffic flows in an attempt to reduce congestion and pollution in the City.

2 Pedestrianisation

SCC is keen to see increased pedestrianisation within the city centre, and considers that over the last decade the pedestrianisation of certain areas of the city have been widely successful, helping local business, shops and leisure outlets to expand. Further pedestrianisation would need careful thought to ensure that the needs of residents those with disabilities are met and allowing loading and unloading for local businesses and access for public transport. This could be implemented more easily if access for buses and taxis were permitted through the redeveloped Maltings (Fisherton Street to Castle Street) This would allow other city centre streets (for example Silver Street or Minster Street) to become properly pedestrianised, allowing people to explore the medieval heart of the city more easily, attracting more visitors and tourists and bringing more money into the local economy.

Map of Proposed Extent of Pedestrian Area



3 Walking and Cycling Links

A considerable amount of work has been done by the Salisbury Area Greenspace Partnership (SAGP) and SCC supports the ongoing work of the SGAP looking at connectivity and green linkages, particularly peripheral and radial greenways which should link new developments around the city, allowing safe traffic-free access for non-car modes of transport, including electric bikes. Please see appendix 2. It is essential that infrastructure must be of high quality for the entirety of the route in order to encourage people to walk and cycle. On road routes with busy traffic are unlikely to attract the sort of modal shift which is needed as the city expands. Proposed routes will need to be protected and it is likely that funding for pedestrian and cycling schemes will need to be increased to ensure high quality routes are provided.

4 Park and Ride

SCC wishes to see more use made of P&R in conjunction with rail travel, by introducing a number of Park and Ride routes that pass through the Railway Station and ensuring that these are well advertised. Extended opening hours for Park and Ride services would assist, as well as better publicity about those bus services which can serve Park and Ride sites 'after hours' if requested to do so. This would increase the use of the Park and Ride and would reduce the need for additional parking spaces at the Railway Station in Salisbury, therefore helping to reduce car dependency and making this an integrated transport hub. SCC would like to reiterate that there is a real need for a link from the Britford Park and Ride to the Hospital Site; this would not be difficult to implement but would be beneficial for all.

5 Air Quality within the City

SCC remains deeply concerned about the issue of air quality within the City.

The current AQ Action Plan (AQAP) for Wiltshire states that one of the actions (S02) is implementation of the Salisbury Transport Strategy (STS) measures that provide the opportunity to improve the air quality within the city. The current AQAP indicates that the estimate is that implementing the transport strategy for Salisbury could ensure that 45% of new trips to the city centre are made by sustainable modes in 2026, compared to 20% by sustainable modes if the strategy was not adopted. There are also estimates [AQAP, Salisbury 9] for how changes in vehicle emissions might improve between 2008 and 2026 based on improved fuel & vehicle technology.

Point 1: The importance of the STS to the AQAP remains, estimates of the impact of the transport strategy on % of trips made by sustainable modes and improvements in AQ need to be updated a) to reflect actual progress from 2008 – present and b) to reflect estimates for the remaining period to 2026.

These estimates need to come from the Transport Strategy and feed into the AQAP. The current themes (page 6, Salisbury Transport Strategy) are derived from eight objectives, and in some areas poorly represent key requirements of a transport strategy for the city.

Point 2: The themes need to be modified as follows:

- the theme to 'improve the accessibility and attractiveness of the city centre' should be expanded to include 'and other key service centres' (which was present in an early draft presented to Stakeholders). It is important these other service centres (e.g. Wilton, Laverstock & Ford) are included in order to reduce the need to travel.
- a theme should be added to 'ensure transport interventions result in air quality across the area being within legal limits'. This stresses the importance of air

quality, and the fact is that AQ issues are increasingly occurring outside the city centre on the approach roads to Salisbury and resolving these problems is not covered in the current theme which only refers to the 'attractiveness' of the city centre

- a theme should be added to 'reduce the need to travel and improve the infrastructure for non-car modes'.

The previous transport strategy linked each objective to a metric, and metrics are required to measure the effectiveness of interventions, and to assist in the prioritisation of schemes.

Point 3: Measures are needed which indicate the effectiveness of any steps implemented from the last Transport Strategy and the likely impact of proposed interventions.

Next steps – the only steps identified in paras 7.14 & 7.15 relate to some modelling results.

Point 4: Further work also needed to identify metrics, prioritise schemes, develop a Local Cycling & Walking Infrastructure plan, calculate contributions from developments to date on S106 & other transport funding and how this will be spent etc.

Improved Air Quality and Noise Pollution – Where there is traffic there is noise and air pollution and where the traffic moves slowly or not at all the situation becomes worse. Reducing City Centre vehicle movements by preventing through traffic, being restrictive with delivery vehicle access couple and the related removal of redundant traffic light stops would radically improve the situation on both counts.

Removal of non-essential traffic – There is a feeling that to avoid the congestion on the Ring Road a significant amount of traffic is going through the City Centre causing the related congestion and air quality issues.

Health and wellbeing – Open spaces encourage walking and cycling and having pleasant environment would encourage both

6 Light Rail Infrastructure to support Neighbouring Towns

At a time of growing concern over the level of traffic congestion this could provide an extremely useful link for commuting from the north of the city. In Europe light rail is proven to be the most efficient way to get people out of their cars and onto public transport. It would make Salisbury a far more attractive city. It would enable Salisbury to develop as a tourist city as most trips to Stonehenge are currently from London via

the A303. The link would encourage more people to come to Salisbury by public transport. The use of some vintage trams in summer would make the line an attraction in its own right (please refer to appendix 1 – this was produced 20+ years ago and would need updating in a number of respects, but it does offer some interesting thoughts into how light rail could be delivered to serve the expanding communities of Amesbury and Bulford.)

7 Economic Recovery Plan

Salisbury is in competition with Bath, Winchester, Bournemouth and Southampton and to pull in new business and attractions, and to re-launch itself as an International tourist destination after recent events in March 2018, there needs to be a comprehensive overhaul of the City Centre to complement what is arguably the finest provincial Market Square and historic surrounds in the Country. This strategy should not impede the work of the Recovery Coordinating Group and where, possible, the strategy should reflect the emerging priorities of this recovery work.

There has been, is currently and are further being proposed, large scale housing developments both within and on the outskirts of the City and slightly further afield with the Army rebasing program all of which will generate increased numbers of residents who, for the economic viability of the City, need to spend their money in Salisbury.

To realise this aspiration a large chunk of City Centre expanding outward for the Market Square should be pedestrianised and while at this point it is not proposed to try and address what is necessary on achieve this on the ground, that is the next piece of work, a sensible starting point is to look at the results for what a successful pedestrianisation program would achieve.

Outcomes

Maintain the vibrancy of the City Centre – As and when the Maltings is built out the developers will naturally wish to showcase their new Mall and push / pull people toward their new site. To maintain the vibrancy of the City Centre it needs to be reinvented and rejuvenated thus increase its economic viability by becoming a much more person friendly environment with a focus on leisure, lifestyle and independent businesses and away from “high pressure” West Quay style shopping centres.

A nicer place to visit – As the impact of on-line shopping increases the pressure on the high street, especially affecting the larger department and chain stores the City Centre needs to adapt to be a much more relaxed and visitor friendly environment for people to come and spend their money. The streets will also be easier to keep

clean, become much more attractive with increased flowers and greenery and require far less repair and maintenance with the much-reduced vehicle use.

Encourage more Leisure, Cultural and Tourist activities and attractions. – The City already has the Market Square and next door the Guildhall Square in which to hold events and attractions, as well as the Cathedral. However, the City's market has a Charter giving it the right to use the Square on every Tuesday and Saturday throughout the year and while the Market is an attraction in its own right it also prevents the City Centre hosting other events for a period any longer than three days and we have evidence from a number of groups that would like to come but don't because they need longer to set up and market themselves. More space would allow for other events to be hosted in the City on the same days as the market giving visitors more than one reason to stay and would allow for a much expanded events calendar.

Ease of Pedestrian Flow - At present pedestrians are confined to narrow pavements hemmed in by busy roads with lots of narrow gaps to squeeze through while transiting from one part of the City to the next via any number of pedestrian crossings. This makes for a pressured "start/stop" environment as there is always something in the way of where one wants to go with the consequence being visitors and shoppers end up going somewhere else. The want is for people to have a more relaxed experience where they can wander around see all the places they want to see in their own time without being herded down certain sections of the Centre and therefore missing all the other shops and attractions going on around them.

Low Carbon City – As part of the redevelopment of the Maltings, SCC supports micro hydro energy proposals at the Bishop's Mill site, such as those put forward by Salisbury Community Energy Limited, as discussed with Wiltshire Council. SCC consider that this proposal would contribute to three important priorities for this area:

- bring new investment to the Maltings
- transform the Bishops Mill and create a new tourism attraction for Salisbury, signalling that the city is clean, green and forward-looking;
- help Wiltshire Council to achieve its strategic objective of becoming a low carbon authority.

Example of a new-generation "Zuppinger Wheel"



8 Other Concerns include:

- The Wiltshire Housing Site Allocations Plan includes plans for an additional 840 dwellings to the west of Harnham, with additional windfall sites, (for example application 18/04067/OUT) – the majority of the traffic leaving these sites will use the Harnham gyratory and Exeter Street roundabout. The refreshed Transport Strategy merely states that modifications to these two important routes will be required, but fails to give any details, design, costing or timescales; it is vital that this work be carried out before the proposed development takes place. The refreshed Transport Strategy does not appear to address the issue of seasonality; traffic loadings across the city are highly season dependent. Peak loadings, especially during summer months and school holidays should be reported and considered. If this data is not currently collected this should be undertaken immediately. SCC believe it essential that all proposed infrastructure improvements are vigorously and robustly tested and modelled in order to validate the expected outcomes in terms of capacity and other traffic flow parameters specified, i.e., that the required mitigation measures and improvements needed to accommodate additional development will indeed be achieved.
- The short amount of time allowed for comments, lack of access to supporting background documents, for example modelling.
- Sustrans National Cycle Network cycle routes through Salisbury should be covered, as should the need for better cycling routes serving the area as well as in the area

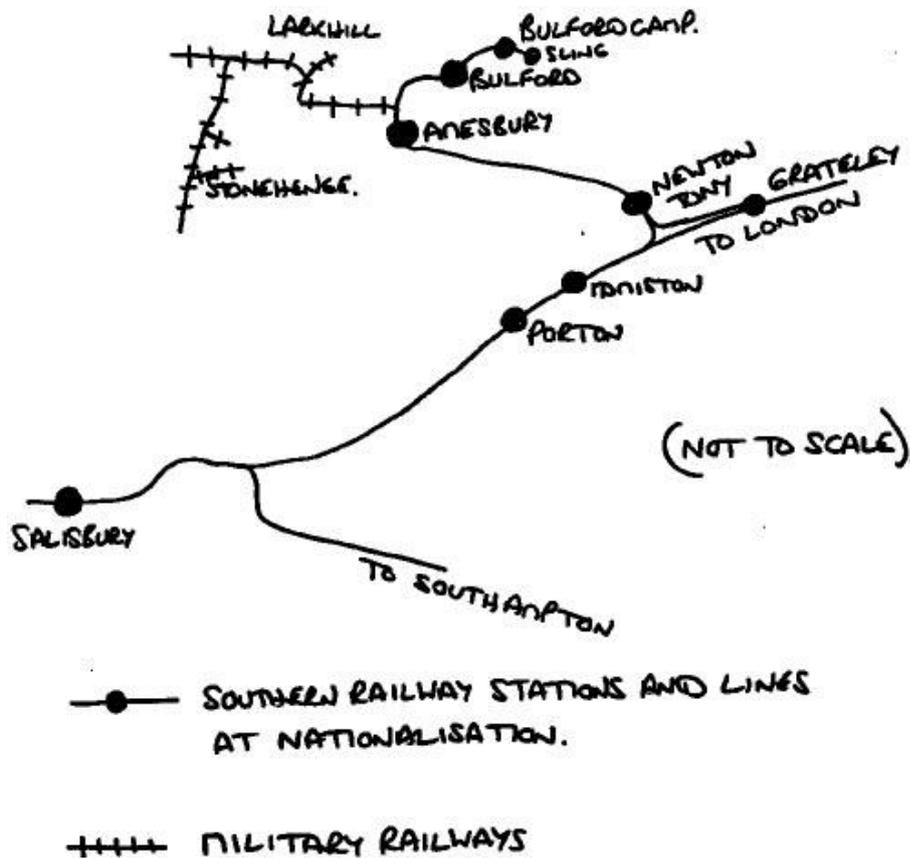
- Inaccurate housing numbers have underestimated the impact of some developments (e.g. Old Manor, Longhedge).
- Clarification needed of the contribution of through traffic to overall traffic in Salisbury
- The impact of interventions on attractiveness and timing of journeys by foot and bicycle would be helpful. A transport model which covers these modes might assist.

SCC is grateful for the opportunity to comment on the Revised Salisbury Transport Strategy and believes in partnership, a number of SCC's priorities can be implemented in the short to medium term.

Yours sincerely

Councillor Jeremy Nettle
Chair of Planning and Transportation

Appendix 1 – Light Rail by Colin Hall



By Rail to Stonehenge – Colin Hall

The problem with all the recent proposals to enhance the environment around Stonehenge is that they are all road based. At present, and for the foreseeable future, the only way to get to Stonehenge is by road. Very little of this is encouraged by public transport. Tourist coaches may reduce the amount of cars coming in but raises the doubt as to whether all using these would otherwise seek out Stonehenge if it was not on the itinerary. The more intrepid tourist arrives in Salisbury by train and then visits the stones via the Wilts & Dorset bus service from the station. This is the only true public transport link and as some of these services also serve Amesbury and Shrewton they are important locally. This shows how tourist revenue can help support rural transport when developed together. The question we must now ask ourselves is why depend on road transport for the future and what could be the alternative.

In 1902 a branch railway line opened from a junction with the main Salisbury to London line near Newton Tony to Amesbury and Bulford. During the First World War a military railway was built from Amesbury station to Larkhill and other camps in that part of Salisbury Plain. The military railway was wound down in stages during the 1920's until final closure in 1928. The branch line to Bulford continued to be extensively used but following the end of the Second World War the passenger service was withdrawn due to intense bus competition in 1952. However, the line continued for freight until 1963.

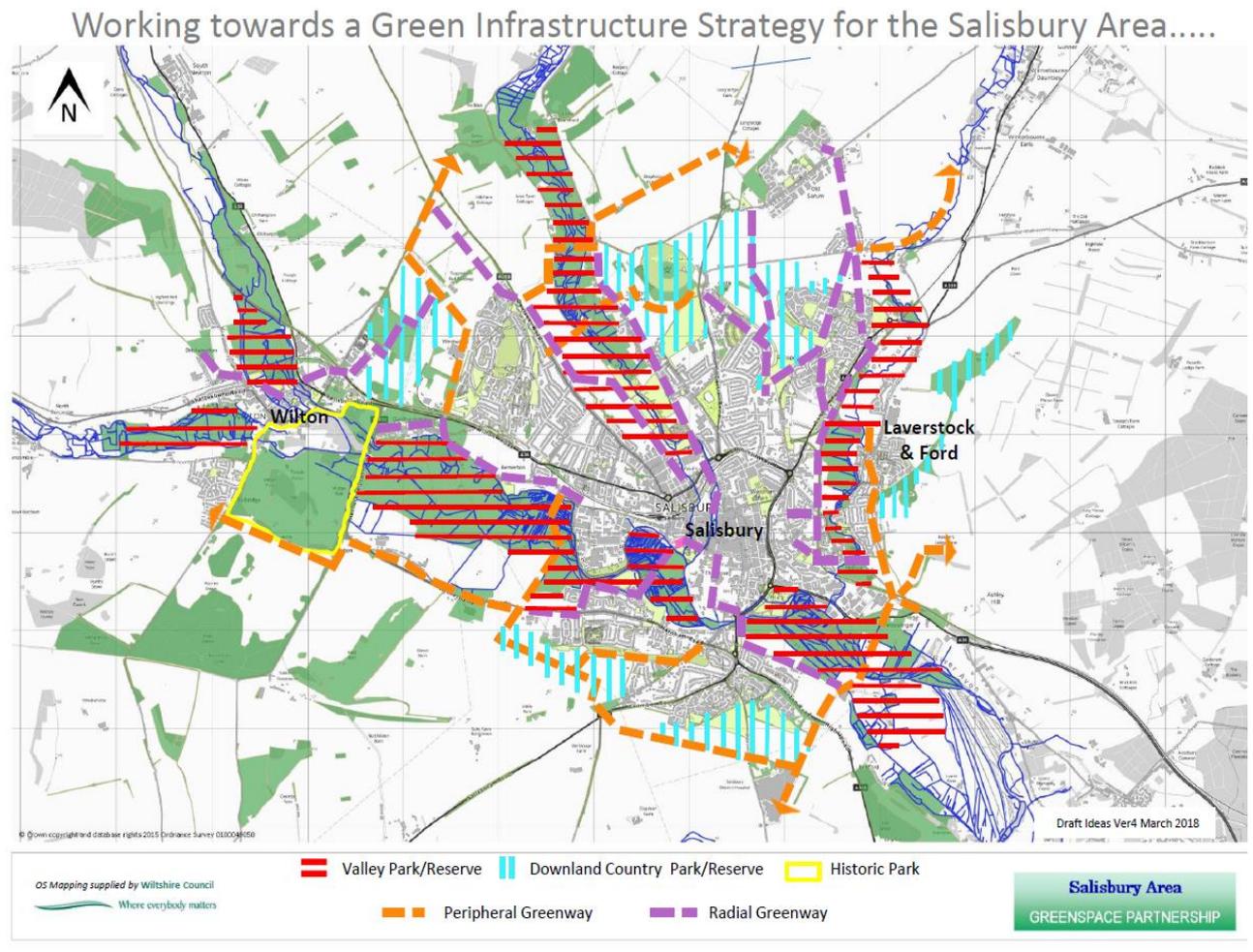
Although the course of these old railway lines has been interfered with by some recent development they are largely still clear. Reopening as a full rail link is out of the question due the high cost but there is potential with light rail. This means a service using modern trams. With their light axle weights and ability to go round sharp curves the cost of rebuilding the line is greatly reduced. Obstacles can be circumvented by stretches of road and street running which also means they can better serve the community by accessing parts a conventional railway cannot. Stations can serve Newton Tony, Amesbury, Bulford, Durrington, Larkhill and Stonehenge. Furthermore new stations can be sited on the main line into Salisbury at Idmiston, Porton, Gomeldon, the Winterbournes and Bishopdown. In Salisbury, by reversing in the railway station and using the remains of the old market railway, this service could terminate in the central car park at the back of Tesco's giving an important boost to the city centre.

The economics are favourable since a sometime failing of public transport due to the high cost of providing for commuter peaks does not apply here. The demand for journeys to and from Stonehenge virtually all year round would provide a high level of usage throughout the day balancing commuting, school and shopping trips.

Funding from the private sector could come from a consortium such as existing local transport operators, Railtrack, the construction industry, banking institutions and pension funds. Public sector funding would come from the local authorities and central government.

Rural and inter urban light rail systems are common in Europe particularly in Austria, Germany and Switzerland with old systems being modernised and new ones built. In Britain trams have already returned to the streets of Manchester, Sheffield and Croydon with considerable success. Closer to home a proposed link between Fareham and Portsmouth is gathering momentum. What better way to celebrate the new millennium than with a new way of looking at transport problems and their solution.

Appendix 2 - Working towards a local Green Infrastructure Strategy in the Salisbury area



The attached plan illustrating ideas for a local green infrastructure strategy is work in progress.

It is based on surveys that identified what & where our green (& blue spaces ie. rivers) are & how well they are connected, & further work is needed to incorporate the connectivity information for Laverstock & Ford, & Wilton.

Looking at the bigger picture, it is possible to see the potential for & value of establishing a range of dedicated routes or greenways for people on foot & cyclists -

peripheral & circular routes, as well as radial greenways making use of the valley corridors & connecting people with schools, local facilities, the city centre, the community hub, the hospital & work places around the area. It is important that these potential routes are safeguarded & protected from development

In addition, the green spaces, & particularly those associated with the river valleys & with the high ground in the area, provide the distinctive landscape setting for Salisbury. They also provide important vantage points for extensive views connecting the urban areas with the countryside beyond & are important for wildlife. Again, there is potential to extend the idea of Downland Country Parks/Reserves to the higher ground in the area eg. Lime Kiln Down & Rowbarrow, & to create Valley Parks/Reserves in the river valleys. This would safeguard & protect important landscapes & valuable wildlife corridors such as Britford Meadows from development in the longer term.

Further work is needed to develop these ideas more fully & to share them with the parish councils in the area as well as with Wiltshire Council. A high quality multifunctional GI network would help to deliver a number of Local Plan (formerly Core Strategy) policies; it is an important consideration in the preparation of neighbourhood plans & should also be an important element in the transport strategy & the master plan for the Salisbury area.

Salisbury Area Greenspace Partnership March 2018

From: [Clark, Ernie](#)
To: [Spatial Planning Policy](#)
Subject: Draft Wiltshire Housing Site Allocations Plan *REF: 16*
Date: 11 June 2018 17:27:24

Hi,

For some reason the following email failed to transmit this morning. Please confirm receipt.

Change PC43

You propose to amend Policy H2 to replace 205 dwellings in Table 5.3 for Elizabeth Way, Hilperton (it is NOT in Trowbridge) with 355 dwellings.

Your justification for the original figure was due to the amount of work that would be needed to make the proposed houses acceptable, hence the low density.

You have accepted the submissions of various developers to increase the allocation whilst ignoring the many cogent reasons put forward by other parties to remove the policy altogether.

As the elected Wiltshire Councillor for Hilperton Division I wish to formally object to the following suggested Wiltshire Council allocation as it is clearly contrary to Wiltshire Council's adopted Core Strategy, specially paragraph 5.150 on page 181 reproduced below:-

It is recognised that the villages surrounding Trowbridge - particularly Hilperton, Southwick, North Bradley and West Ashton - have separate and distinct identities as villages. Open countryside should be maintained to protect the character and identity of these villages as separate communities. The local communities may wish to consider this matter in more detail in any future community-led neighbourhood planning.

263/297/293 (part) – Hilperton Gap, located in Hilperton parish. It should be noted that Hilperton Parish Council policy is to oppose development in the Hilperton Gap in order to prevent its coalescence with Trowbridge.

This suggestion would **NOT** maintain open countryside between the town and the village, nor would it protect the character and identity of the village as a separate community.

Ernie Clark,

Wiltshire Councillor for Hilperton Division,
Independent Group leader, Wiltshire Council.

www.ernieclark.org.uk

3 Stonelea,

Hilperton,

Wiltshire, BA14 7QQ.

0794 120 1995

01225 769940

From: [Deborah Lawrence](#)
To: [Spatial Planning Policy](#)
Subject: RE: Briefing Note 355 - Wiltshire Housing Site Allocations Plan - DEFERRAL OF DECISION *REF: 16*
Date: 12 June 2018 16:13:30
Attachments: [image001.jpg](#)
[image003.jpg](#)

Good afternoon

At the Council meeting held on Monday 11th June 2018, the Council made no comment regarding the above briefing note.

Regards

Debbie

Deborah Lawrence, PSLCC
Parish Clerk
Purton Parish Council
Station Road
Purton
Wiltshire , SN5 4AJ
01793 771066



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From: Spatial Planning Policy [mailto:SpatialPlanningPolicy@wiltshire.gov.uk]

Sent: 22 May 2018 10:14

To: clerkpurton

Subject: FW: Briefing Note 355 - Wiltshire Housing Site Allocations Plan - DEFERRAL OF DECISION

Dear Ms Lawrence,

Thank you for your email in respect of the above.

In recognition of the fact that your relevant committee will not meet until 11 June, can you please send us your draft response as soon as possible and then confirm the formal response on the **12 June**.

Yours sincerely

Georgina Clampitt-Dix
Head Spatial Planning

Economic Development and Planning
Wiltshire Council | County Hall | Trowbridge | Wiltshire | BA14 8JN
Telephone: 01225 713223
Website: www.wiltshire.gov.uk

From: Democratic and Member Services
Sent: 18 May 2018 09:22
To: Spatial Planning Policy
Subject: FW: Briefing Note 355 - Wiltshire Housing Site Allocations Plan - DEFERRAL OF DECISION
HC to GW

From: Deborah Lawrence [<mailto:clerk@purtonpc.eclipse.co.uk>]
Sent: 17 May 2018 18:19
To: Democratic and Member Services <Committee@wiltshire.gov.uk>
Subject: RE: Briefing Note 355 - Wiltshire Housing Site Allocations Plan - DEFERRAL OF DECISION
Good evening

This briefing note has a deadline for comment of 11th June 12 noon, however our Council meeting isn't held until then, can I ask for an extension of a few days to allow comment ?

Regards

Debbie

Deborah Lawrence, PSLCC
Parish Clerk
Purton Parish Council
Station Road
Purton
Wiltshire , SN5 4AJ
01793 771066



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From: Democratic and Member Services [<mailto:Committee@wiltshire.gov.uk>]
Sent: 17 May 2018 17:32

To: undisclosed-recipients:

Subject: Briefing Note 355 - Wiltshire Housing Site Allocations Plan - DEFERRAL OF DECISION

Importance: High

Good Afternoon,

Please find attached a copy of Briefing Note no. 355

Note: this Briefing Note has been circulated to Parish & Town Clerks at the request of the author.

Many thanks,

Democratic Services

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From: McLennan, Ian
Sent: 09 June 2018 12:04
To: Clampitt-dix, Georgina
Subject: Consultation on site allocations for housing, within the core strategy

Georgina

Apologies, I am just off on holiday and remembered I have not input to the consultation, as members were asked.

I have many new homes allocated and built, as you know, in my ward/parish. However, there is one new site and that is the site known to Spatial Planning as 'The Yard' at Hampton Park/Bishopdown Farm, in Laverstock & Ford Parish.

Although in Cllr Derek Brown's ward, it impacts on my ward, as you would recognise.

I fully support this allocation of 14 dwellings. It was 'omitted' when this particular land was not sold to Barratt's for their 500 homes. I understand that this is why it would eventually reappear.

The documentation states entry via Neal Close, in Hampton Park. I suggest that the entrance should be via the shared road which will also be the entrance to the country park. The PC and Mr Pearce agree to a re-sited entrance on Roman Road, rather than use the existing entrance. This will provide better vision in both directions. Mr Pearce can then fund, via the development!

[REDACTED]

I ask that you input my thoughts to the consultation.

Many thanks

Ian

Cllr Ian McLennan
Laverstock, Ford & Old Sarum

[REDACTED]