

**Report on consultation with Wiltshire Councillors and town and parish councils
on the proposed changes to the Wiltshire Housing Site Allocations Plan
15th May -11th June 2018**

- 1.0 On 15 May 2018, Wiltshire Council's Cabinet deferred making a decision on the draft Wiltshire Housing Site Allocations Plan (the draft Plan), which was then due to go to Full Council on 22 May 2018. The decision to defer was taken to provide Wiltshire councillors with more time to fully consider the documents prepared by officers, and specifically, the Schedule of Proposed Changes to the draft plan. Cabinet considered that this offer should also be made available to parish and town councils. Comments on the Schedule of Proposed Changes were invited to be received by Noon Monday 11 June 2018.
- 1.1 The papers presented to Cabinet on 15 May 2018 will be considered, alongside comments received in respect of the Schedule of Proposed Changes as set out in this Addendum, at Cabinet on 3 July 2018 and then Full Council on 10 July 2018. For ease of reference the papers can be accessed via the following link:
<https://cms.wiltshire.gov.uk/ieListDocuments.aspx?CId=1393&MId=12117>
- 1.2 This Addendum will inform additional changes to the schedule of Proposed Changes as set out at Appendix 2 of the report originally presented to Cabinet on 15 May 2018.

2.0 Representations Received

- 2.1 In total representations were received from 20 respondents. Responses were received from 2 Wiltshire Councillors, 15 parish and town councils (of which two Parish Councils – Market Lavington and North Bradley submitted a joint response) and 3 Neighbourhood Plan Steering Groups (of which two steering groups – Market Lavington and North Bradley submitted a joint response). A summary of each response along with an officer response can be found in **Table 1** below. Full, verbatim transcripts of every response received can be found at **Appendix 1** to this Addendum document.
- 2.2 Whilst the consultation was for Wiltshire Councillors and parish and town councils 18 representations were received from members of the public. These responses from individual members of the public were not purposefully invited, as the consultation was specifically undertaken with town/parish councils and Wiltshire Council councillors only. However, in the interests of inclusivity, they have nonetheless been faithfully recorded as duly made. Details of each response and the response of officers can be found in **Table 2** below. Full, verbatim transcripts of every response received can be found at **Appendix 2** to this Addendum document.
- 2.3 Some changes are proposed for the settlement boundaries of Seend, Winterslow and Codford. Maps showing these proposed changes can be found at **Appendix 3**.

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Table 1: Summary of representations received from Wiltshire Councillors, town and parish councils and neighbourhood plan steering groups, and the Council’s response

Response number	Councillor/ Town or parish council	Summary of response	Officer response	Proposed change
1 and 1a (Crudwell Parish Council submitted two responses)	Crudwell Parish Council	<p>Crudwell Parish Council note that it was stated at the Cabinet meeting on the 15th May that Wiltshire Council will work with Market Lavington and North Bradley Parish Councils to help them reach their Regulation 16 stage before the Examination into the WHSAP. Crudwell Neighbourhood Plan has a similar timetable, rapid progress has been made and there is public support got the neighbourhood plan. It should therefore be treated in a similar way to Market Lavington and North Bradley.</p> <p>There is no strategic need to allocate housing sites in Malmesbury Community Area and the allocation of housing should be left to the neighbourhood plan</p>	<p>In accordance with the Council’s site selection methodology the Large Village of Crudwell fell within the draft Wiltshire Housing Site Allocations Plan (draft Plan) remit to help support the delivery of housing within the Malmesbury Community Area and thereby address the then indicative housing requirement set by the Wiltshire Core Strategy for 70 dwellings. Since the publication of the draft Plan the indicative, strategic housing requirement has now been met and hence there is a case for recommending that the proposed allocation at Ridgeway Farm be deleted from the draft Plan in order to allow the Qualifying Body to expedite their neighbourhood plan and thereby deliver housing to meet locally defined need. Whilst the draft neighbourhood plan is yet to reach the Regulation 14 stage, it is acknowledged that good progress has been made. However, in the interests of ensuring that the overall housing land supply position across the North and West Housing Market Area is sustained it is recommended that the proposed allocation be retained at this stage. The Council will continue to work with the Qualifying Body to progress their neighbourhood plan through to the Regulation</p>	<p>No change at this stage, the position will be kept under review and considered in detail through the examination of the draft Plan.</p>

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			<p>16/examination stage. In addition, the housing land supply position will continue to be monitored to inform the examination of the draft Plan. Should the emerging Crudwell neighbourhood plan continue to progress rapidly and soundly, then a decision as to whether to proceed with the proposed Ridgeway Farm site can be debated through the examination of the draft Plan.</p>	
2	Codford Parish Council	<p>The Codford Parish Council is happy with the current proposals for the village. However, they would also like to include the following amendments to the proposed settlement boundary before the draft Plan is submitted for examination:</p> <ul style="list-style-type: none"> • Include G5, H5 Bury Farm as this site has already been built on. • Propose D4 Ivy Cottage as a site for redevelopment. 	<p><u>Proposed Settlement Boundary Map</u> <u>Reference: G5, H5, Bury Farm</u></p> <p>The exclusion of the built residential development at Bury Farm is a mapping error, as the methodology includes built residential development that is physically related to the settlement. The adjacent farm buildings are part of the curtilage of Bury Farm/ built employment development that relates more to the built environment and, so should be included under the methodology. In any case, they are currently undergoing conversion to residential development.</p> <p><u>Proposed Settlement Boundary Map</u> <u>Reference: D4, Ivy Cottages</u></p> <p>Officers acknowledge the Parish Council's desire to see land at Ivy Cottages allocated for development by bringing it within the proposed settlement boundary line. However,</p>	<p>Make Proposed Changes to include the built residential development at Bury Farm and adjacent farm buildings within the proposed settlement boundary for Codford (See Appendix 3)</p>

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			<p>the land in question is considered to be some distance from the settlement boundary and the urban edge of Codford. Therefore, it would be impractical to include this land within the settlement boundary, particularly when assessed against the Council’s methodology on such matters.</p> <p>The Core Strategy includes ‘exception policies’ (see <i>paragraph 4.25 of the Wiltshire Core Strategy</i>) that, depending upon the type of redevelopment proposed, could be considered as a way forward. Alternatively, redevelopment of this site could be something that the community might wish to pursue through a future neighbourhood plan.</p>	
3	Westbury Town Council	<p>Westbury Town Council does not have any adverse comments but 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. They welcome the recognition 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.</p>	Comments noted.	No changes

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		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.		
4	Seend Parish Council	<p>Seend Parish Council propose the following settlement boundary changes: On the western boundary at F8/G8, Seend Parish Council do not agree that the site on the western boundary at F8/G8 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.</p> <p>On H8/I8 more of the frontage of Seend House has been included which was not included in our original response of September 2017. Seend Parish Council would like the boundary line drawn back to the trees and the properties as per our previous submission.</p>	<p><u>Proposed Settlement Boundary Map Reference: Western boundary at F8/G8</u></p> <p>Officers agree that this car park represents the extended curtilage of a property that relates more to the open countryside, in terms of its setting.</p> <p><u>Proposed Settlement Boundary Map Reference: H8/I8 frontage of Seend House</u></p> <p>Officers agree to amend the settlement boundary in this area in the interests of consistency as this would be in line with previous amendments to the settlement boundary for Seend that have excluded large dwellings/ curtilages or part thereof.</p>	<p>Make Proposed Changes to:</p> <p>(i) Exclude the car park on the western boundary F8/G8 from within the proposed settlement boundary for Seend.</p> <p>(ii) Retain the line of the existing settlement boundary in this area, except to include the strip of amenity land adjacent to the</p>

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				High Street, which relates more closely to the built environment. (See Appendix 3.)
5 and 5a Original response and proposed changes	Trowbridge Town Council	<p>Trowbridge Town Council reconsidered the draft Plan at an extraordinary meeting of the Policy and Resources Committee held on Tuesday 5th June. The committee, having considered the matter resolved the following:</p> <p>A. Trowbridge Town Council supports Wiltshire Council’s allocation of 1000 of the Windfalls allowance for the North & West Housing Market Area to Trowbridge CA as expressed by Councillor Sturgis at the Trowbridge Area Board on Thursday 24th May 2018.</p> <p>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.</p> <p>C. Trowbridge Town Council supports Wiltshire Council in seeking to</p>	<p>A. The windfall allowance for Wiltshire is presented at a Housing Market Area (HMA) level. Bringing forward brownfield sites is rarely straightforward due to the legacy of previous uses and the additional costs associated with redevelopment. Consequently, in housing land supply terms, brownfield sites without planning permission are not considered to be a reliable source of supply on a small geographical scale such as the settlement level.</p> <p>The Brownfield Register published on the Wiltshire Council website identifies sites in Trowbridge with a total capacity of 212 dwellings, of which 112 are allocated in the development plan and 100 have the benefit of planning permission. These sites are therefore already included in the housing land supply and will not contribute to the windfall allowance.</p>	No changes.

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		<p>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.</p> <p>D. Trowbridge Town Council supports Wiltshire Council in the allocation of the following sites to meet part of the shortfall: Spring Meadow SHELAA site 3260 (45 dwellings) Elm Grove Farm SHELAA sites 248/613 (250 dwellings) Church Lane SHELAA site 1021 (45 dwelling) 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 dwellings) Biss Farm SHELAA site 3247 (267 dwellings)</p> <p>E. Trowbridge Town Council does not support the following sites which are contrary to the Wiltshire Core Strategy: South of Elizabeth Way (355 dwellings)</p>	<p>Furthermore, previous experience has shown that relying on brownfield sites allocated in a development plan can result in a shortfall in housing land supply. This approach was adopted in the North Wiltshire Local Plan for Chippenham. Significant delays in bringing forward the allocated brownfield sites led to a substantial drop in housing delivery for the town over a sustained period. This had a negative impact on the demonstrable housing land supply, and contributed to unplanned speculative development coming forward across the housing market area.</p> <p>Given that there is less than 8 years of the plan period remaining, there would need to be robust and credible evidence to support the allocation of previously developed land in a local plan with such a short time horizon.</p> <p>The approach to windfall development developed for assessing housing land supply has been tested numerous times at planning appeal and found to be robust. The allowance is based on historic delivery rates for each HMA, smoothing out any peaks and troughs in delivery generally seen at the settlement level.</p>	

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		<p>White Horse Business Park (225 dwellings) Southwick Court (180 dwellings)</p> <p>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.</p> <p>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.</p> <p>H. Trowbridge Town Council does not support the redevelopment of the QEII 'Fields in Trust' Elm Grove Recreation Ground as part of a</p>	<p>As explained in Topic Paper 2 (paragraph 4.9) a separate windfall allowance is included in the housing land supply for each of the HMAs. The delivery of brownfield sites in Trowbridge up to 2026 has therefore already been accounted for in the evidence base for the WHSAP.</p> <p>There is no doubt that brownfield sites will make a significant contribution to the supply across the HMA as a whole. The evidence to support the HSAP indicates that 2,209 dwellings on such sites will be delivered in the North and West HMA between 2017 and 2026. This figure is based on a robust and defensible methodology and will no doubt be met to some extent through the delivery of brownfield sites in Trowbridge.</p> <p>B. Officers do not agree that the shortfall for Trowbridge is 843 dwellings. There is no evidence to indicate that Trowbridge would be able to deliver 1,000 dwellings from windfall sites that have not already been accounted for in the supply, by 2026. This would equate to 45% of the windfall allowance in the North and West HMA at a single settlement, which is significantly above historic rates, and is</p>	

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		<p>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.</p> <p>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.</p>	<p>not considered to be realistic or justified. A windfall allowance has already been taken into account for the HMA in the evidence base for the WHSAP. It is important the WHSAP provides surety of supply, something which cannot be achieved by relying on windfall development with less than 8 years of the plan period remaining. The shortfall for Trowbridge is therefore 2,230 dwellings.</p> <p>C. As shown in table 3.1 of the addendum to Topic Paper 3 the indicative remaining requirement for the Principal Settlement of Trowbridge has increased in recent years, mainly due to the delays in bringing forward the allocated site at Ashton Park. The indicative remaining requirement for the town as at April 2017 is 2,230 dwellings. This is significantly below the amount of development envisaged. It should be noted that the sites proposed for allocation at Trowbridge in the HSAP will not address the full shortfall of 2,230 but goes some way to correcting the current imbalance. The site selection process undertaken is robust and thorough, eliminating any sites that are currently not considered suitable for development. The reasons behind the selection of sites for the WHSAP can be</p>	

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		<p>In light of the above Trowbridge Town Council recommend a number of detailed changes which can be found in their full representation in Appendix 1.</p>	<p>found in the Trowbridge Community Area Topic Paper.</p> <p>D. Support noted.</p> <p>Biss Farm is located on an existing employment allocation associated with Ashton Park. As explained in the Community Area Topic paper for Trowbridge, the allocation of this site for housing development would be contrary to the Wiltshire Core Strategy and was therefore excluded from further consideration.</p> <p>Officers were not aware of a proposed extension to the site proposed by Wain Homes. Should this proposal become apparent in due course it will be considered in the housing land supply calculations.</p> <p>E. None of the sites allocated in the WHSAP will impact unacceptably upon the character and identity of the villages of Hilperton, Southwick, North Bradley or West Ashton. This has been demonstrated in the significant level of assessment undertaken for each of the sites proposed. Moreover, the policies of the Wiltshire Core Strategy would be</p>	

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			<p>applied to the consideration of any subsequent planning application and thereby limit such impacts.</p> <p>F. Where there is a shortfall in one location it does not follow that should be met by over delivery in another. Trowbridge is a Principal Settlement and so reallocating the shortfall to other Market Towns and Large Villages would result in an imbalance in the sustainable pattern of development planned for Wiltshire. Furthermore, Market Towns such as Melksham, Calne and Westbury have sufficient existing commitments to provide a steady supply of housing to the end of the plan period and potentially beyond. Every effort should therefore be made to identify sites at Trowbridge sufficient to ensure surety of supply for the North and West HMA.</p> <p>The Wiltshire Core Strategy sets out the strategic policies for the delivery of sustainable development across Wiltshire.</p> <p>Taken together CP1 and CP2 provide the context for the selection of sites for the WHSAP. Clearly it is important that the WHSAP seeks to avoid any imbalance in delivery of housing in Wiltshire. Table 4.2</p>	

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			<p>of Topic Paper 3: Housing Land Supply shows the indicative remaining requirement for each of the Community Areas, taking into account housing completions and developable commitments. The table illustrates that the majority of Community Areas are on track to meet or exceed their indicative requirements. However, the Principal Settlement of Trowbridge immediately stands out with a housing shortfall of 2,230 against the indicative requirement for the town. The Trowbridge Community Area Topic Paper notes this and highlights in paragraph 2.13 that the shortfall is predominantly due to delays in the delivery of the strategic allocation at Ashton Park and this remains the same today, despite Outline planning permission having been granted for the development of 2,500 homes in 2018.</p> <p>The status of Trowbridge in the settlement hierarchy means that the displacement of housing from the town to lower tier settlements would be likely to result in undermining the sustainable pattern of development for Wiltshire. This is something that should therefore be avoided wherever possible, particularly where other settlements have already met</p>	

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			<p>or exceeded their own indicative requirements. The WHSAP has sought to test the capacity of the town to accommodate growth through the identification of additional site allocations, whilst being mindful of housing delivery across the housing market area.</p> <p>It should be noted that the sites proposed for allocation at Trowbridge in the WHSAP will not address the full shortfall but go some way to correcting the current imbalance. The site selection process undertaken is robust and thorough, eliminating any sites that are currently not considered suitable for development. The reasons behind the selection of sites for the WHSAP can be found in the Trowbridge Community Area Topic Paper.</p> <p>G. A review of the Green Belt may be undertaken as part of the Local Plan Review, although the need to do so is yet to be determined. The NPPF states that “Greenbelts should only be altered in exceptional circumstances”. This means that all other reasonable alternative options should be considered in the first instance.</p>	

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			<p>The Wiltshire Core Strategy Examining Inspector concluded that the council should prepare a housing site allocations plan to ensure security of supply to the end of the plan period. Trowbridge is a principal settlement and it is therefore entirely appropriate to seek to allocate land as proposed in the WHSAP. The proposed sites have all been rigorously assessed as part of the site selection process, and the evidence indicates that they are suitable for development.</p> <p>H. There is an existing need for a two-form entry mainstream primary school in Trowbridge. Whilst it is appreciated that there is also a need to accommodate pupils with special needs as well, the debate for special school provision does not fall under the remit of this draft Plan. The draft Plan seeks to bring forward a new mainstream two-form entry primary school site as part of site allocation H2.1 Elm Grove Farm as no other alternative site has been identified within the plan period to meet the need of the town. There is provision of an alternative site within the development for a replacement playing field which could be dedicated as a replacement and provide betterment for the local community. See Appendix 3 –</p>	

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			<p>Note on Elm Grove Field that went to Cabinet May 2018.</p> <p>I. Comments noted.</p>	
6	Durrington Town Council	<p>Durrington should be reclassified as a Large Village, not be part of the Market town of Amesbury, Bulford and Durrington.</p> <p>Only housing site allocations for Durrington alone have been put forward to this stage, there is no allocation for Bulford or Amesbury. 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 and should be reassessed based on new evidence.</p> <p>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</p>	<p>Officers acknowledged the comment that Durrington should be classified as a Large Village, which was also raised through Durrington Town Council’s representation during the Summer 2017 pre-submission consultation. The draft Plan is based on the current Wiltshire Core Strategy, which classifies Durrington as part of a group of settlements making up a Market Town, with Amesbury and Bulford. The matter of re-designation can be considered through the Local Plan Review, but it is beyond the scope of this Plan to re-classify settlements.</p> <p>Land to the north of London Road, Amesbury has been assessed. As set out in the Amesbury Community Area Topic Paper this site (SHLAA reference 3379) was re-assessed on the basis of updated evidence that confirmed that the land is not needed in relation to the proposed A303 dualling project. Even with this information, the site is still assessed as being a ‘less sustainable’ option due to the potential impacts on future residents associated with noise and air pollution from the A303 as well as the</p>	No changes

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		<p>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.</p> <p>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.</p> <p>Allocation H2.5 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.</p>	<p>adjacent industrial uses on the Solstice Business Park. Despite the submission of a proposed layout during the Summer 2017 consultation that was informed by a noise assessment, our conclusions consider that the effects of vehicular noise would still be problematic to mitigate due to the topography of the site, resulting in a development that would be suboptimal for its residents. It is considered that there are more sustainable options available in the area of search, and these are at Durrington. Due to the role of Amesbury as a larger settlement, the ‘less sustainable’ option at Amesbury was considered, however it was concluded that the benefits of developing the site would not outweigh the negative effects.</p> <p>Army rebasing: As stated in the Regulation 22 Consultation Report, the Army Basing Programme is recognised as being a factor likely to put pressure on local services and facilities. The programme has considered the impacts of additional Service Family Accommodation (SFA) in the area. Assessments have been carried out (based on a worse case basis in relation to potential numbers). Necessary infrastructure and services are being put in place, such as additional road junction, cycle paths and pedestrian footpaths to encourage people to</p>	

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			<p>travel by means other than car. On the whole, the programme aims to increase the self-containment of military personnel on the bases. However, it is acknowledged that actual future traffic movements and use of facilities at Durrington cannot be known for certain at this stage. The allocations within the draft Housing Sites Allocations Plan, have been assessed in terms of their potential impact on Durrington. The impact on the local highway network is considered to be low, and it is considered that the local services and facilities are able to cope with the additional population and/or planning proposals will be subject to requirements to provide or contribute to necessary improvements. Therefore, the Army Basing Programme and the Wiltshire Housing Site Allocations Plan process have each assessed their impacts carefully. Any further queries regarding the implications of the Army Basing Programme should be directed through the appropriate channels to that programme. Cumulative impacts on environmental effects and European habitats designations (for example impacts on the River Avon SAC) have been assessed through the SEA and HRA of the WHSAP.</p> <p>Allocation 2.5 Clover Lane: Highways Officers have commented on the allocation at</p>	

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			<p>Clover Lane and not raised any objection from a highways perspective. As an aside, it should be noted that the Clover Lane allocation is for approx. 34 dwellings in addition to the existing Avon Fields outline planning permission – the land linking site S98 and site 3154 was already included within the Avon Fields proposals for approximately 11 larger dwellings. As stated in the Reg 22 statement “Development should be delivered according to the policy and taking account of issues raised during site assessment and consultation, including impacts on the River Avon SAC and SSSI, water infrastructure and drainage. The planning application process will also require that any necessary assessment is carried out and informs the proposals so that requirements can be met.” and “Considerations such as the impacts on highways, landscape, flooding and local services were taken into account during the site assessment process. None of the potential impacts were thought to be insurmountable based on evidence available at the time of assessment.”</p> <p>This means that all the relevant issues – raised through our own sustainability assessment as well as through the Summer 2017 consultation – were considered and necessary requirements have been included in the policy to supplement the usual</p>	

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			requirements that take place during the planning application process, such as flood risk assessment, transport assessment.	
7	Yatton Keynall Parish Council	<p>The following amendments are requested to be made to the schedule of proposed changes.</p> <ul style="list-style-type: none"> 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 	<p>The ability to provide a fresh water supply system and foul water system to cope with a development on this site is considered capable of being satisfactorily resolved through the development management process and does not need to be reiterated within policy. It is stated in the Chippenham Community Area Paper that there this is a wider consideration and measures will be needed to address this issue, as follows: “In Yatton Keynell there is limited capacity available from local mains for water supply. An assessment of capacity for water supply would need to be undertaken in order to support any subsequent planning applications. Infrastructure upgrades may be required and agreed through dialogue with the relevant water utilities company.”</p> <p>With regard to access arrangements, it is important to stress that Farrells Field is an adopted road, that was clearly designed in such a way as to allow for future extension of Farrells Field. On the basis of evidence gathered to date, the proposal to access via Farrells Field would be the solution preferred by our Highway engineers.</p>	No changes

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		<p>“Access would be taken directly from the B4039 with provision for pedestrian only access through Farrells Field.”</p>	<p>Officers acknowledge that access could be achieved directly off the B4039. However, this would likely be costlier to achieve and therefore the viability of delivering a small-scale development on the site may not be capable of yielding other community benefits, such as affordable housing. These matters would need to be addressed in detail at any subsequent planning application stage.</p>	
8 Joint response	North Bradley and Market Lavington Parish Councils	<p>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, a choice exists in plan making terms between a top-down approach undertaken by unelected officers; or with the help and support of the community via neighbourhood plans.</p> <p>The Parish Councils do not want to create conflict between traditional and newer community based plans. The emerging neighbourhood plans for both Market Lavington and North Bradley have similar aims to the draft Wiltshire Housing Site Allocations Plan and should therefore be</p>	<p>As anticipated by primary and secondary legislation, Wiltshire Council fully supports neighbourhood planning. In this regard, it is acknowledged that good progress has been made in respect of both the Market Lavington and North Bradley Neighbourhood Plans.</p> <p>The weight to be attached to emerging plans, including neighbourhood plans, is ultimately a matter for the decision maker to conclude, based upon the advice set out in paragraph 216 of the National Planning Policy Framework.</p> <p>Indeed, this position has been well rehearsed through appeal decisions¹ and the Courts. Planning Inspectors are clearly and consistently applying the advice in paragraph</p>	No changes

¹ Mr Gary Russell of Mulberry Homes (Ropley) Limited v East Hampshire District Council (17th April 2018); Mr J Wells (Studios Building (Falmouth) Ltd) v Cornwall Council (20th December 2017); Mr Richard Shires (R&S Shires(Farmers) Ltd) v Milton Keynes Council

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Response number	Councillor/ Town or parish council	Summary of response	Officer response	Proposed change
		<p>supported by Wiltshire Council in preference over a top down imposition of site allocations that communities do not favour.</p> <p>Moreover, Wiltshire Council are incorrect in their assessment of the weight to be attached to emerging neighbourhood plans. Weight should be applied to emerging neighbourhood plans at all stages of their preparation, not just at the Regulation 16/examination stage. Therefore, where an emerging neighbourhood plan identifies sites for housing development it should be supported to deliver what the community consider is an acceptable level of growth.</p> <p>A joint approach is needed whereby strategic housing need is met in the first instance by neighbourhood plans and only where this is insufficient should strategic sites be imposed on communities.</p> <p>Comments in respect of Wiltshire Council's Proposed Changes (PC)</p> <p>PC13: The Council's claim that 1247 homes at Ashton Park will not be built until after 2026 is baseless. The Council</p>	<p>216 and concluding that only limited weight can be ascribed to emerging neighbourhood plans, particularly where such documents have not reached a sufficiently advanced and robustly tested stage – i.e. the Regulation 16/examination stage.</p> <p>In line with the advice set out in the Planning Practice Guidance, officers respect the evidence prepared to date by both Parish Councils. Each neighbourhood plans is either at, or working towards the Regulation 14 stage. At this moment in time, it is not certain that they will go on to support the strategic priorities set out within the adopted Wiltshire Core Strategy through the delivery of housing to meet local needs. Indeed, in this regard, it is clear from the Planning Practice Guidance that neighbourhood planning should not seek to undermine the strategic policies/priorities of the Core Strategy.</p> <p>Whilst it is accepted that the indicative housing requirement for the Devizes Community Area has been met, the Council must present a rolling 5-year housing land supply position at the Housing Market Area level. The proposed allocations at Market Lavington have been robustly assessed and are considered to be deliverable, developable and thereby capable of supporting the supply</p>	

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Response number	Councillor/ Town or parish council	Summary of response	Officer response	Proposed change
		<p>cannot use this as a justification for increasing the density of certain sites and maintaining support for strategic sites in locations that are preparing neighbourhood plans.</p> <p>PC18: Policy H1 introduces sites that Market Lavington Parish Council are opposed to the allocation of the Underhill Nursery site which is too large and would, if developed, create significant environmental effects. It should therefore be removed from the draft Wiltshire Housing Site Allocations Plan. In order to support the Localism Agenda, the Parish Council’s preferred sites at Longfield (The Spring, 20 homes) and Spin Hill (25 homes) should be carried forward instead. Notwithstanding the Parish Council’s intention to bring forward housing sites through the Neighbourhood Plan, it is noted that the indicative housing requirement for the Devizes Community Area has already been met. This therefore adds further weight to the argument that the allocations proposed by Wiltshire Council should be withdrawn in order to allow the community of Market Lavington to determine the scale and location of development they consider is appropriate.</p>	<p>of housing in the East Wiltshire Housing Market Area.</p> <p>At Trowbridge, the indicative housing requirement to be delivered is very far from being addressed. Indeed, even with the recent resolution to grant planning permission for the Ashton Park Strategically Important Site Allocation, the overall remaining requirement stands at 2,230 dwellings. Therefore, in order to deliver the expected level of housing set out within the Wiltshire Core Strategy, further strategically important areas of land around the town need to be allocated, as anticipated by Core Policy 29. Indeed, without such land coming forward, there is a significant risk that the Council will fail to demonstrate it can maintain a 5-year housing land supply position within the North and West Housing Market Area, leading to the potential risk of speculative planning applications and appeals.</p> <p>The proposed allocation H2.2 (Land off the A363 at White Horse Business Park) has been identified and assessed in the light of the policies of the Wiltshire Core Strategy. In this regard, the text within the draft Plan that supports the proposed allocation clearly anticipates that any subsequent development proposals would: retain visual separation of</p>	

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Response number	Councillor/ Town or parish council	Summary of response	Officer response	Proposed change
		<p>PC18: In addition, the proposal to increase housing numbers on a range of sites is not supported by evidence and should therefore be withdrawn.</p> <p>PC18: With regard to Policy H2, North Bradley Parish Council oppose the allocation of H2.2 Land off the White Horse Business Park and request it be removed from the draft Wiltshire Housing Site Allocations Plan. In lieu of the H2.2 site, the Parish Council are seeking to allocate:</p> <p>The Paddock (8 homes), Land at Woodmarsh (25 homes), Park Farm (35 homes), Land off Westbury Road, Yarnbrook (22 homes). A total of 90 homes would be allocated by the neighbourhood plan and this should be supported by Wiltshire Council in preference to imposing strategic sites on the parish that would effectively lead to the coalescence of the town and village.</p> <p>PC18: North Bradley Parish Council support Wiltshire Council's proposed allocation of: Southwick Court (180 homes) and Elm Grove Farm (200 homes). When these sites are added to</p>	<p>the Town's urban area from North Bradley Village (paragraph 5.52); and protect the integrity of North Bradley as a Village (paragraph 5.56). Moreover, in order to provide the necessary level of mitigation to support protected bat species, existing hedgerow and trees will need to be protected to respect the setting of North Bradley Village (paragraph 5.53)</p> <p>Officers therefore recommend that the Council proceeds to propose the allocation of the Underhill Nursery site (H1.2) in Market Lavington and site H2.2 (Land off the A363 at White Horse Business Park) to help sustain a 5-year housing land supply position for the East Wiltshire and North and West Wiltshire Housing Market Areas respectively.</p>	

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Response number	Councillor/ Town or parish council	Summary of response	Officer response	Proposed change
		<p>the proposed neighbourhood plan sites a total of 470 homes would come forward to support the overall indicative requirements for the town.</p> <p>PC29: The proposed Underhill nursery site should be withdrawn.</p> <p>PC33: The evidence to support the increase the housing numbers for the Elm Grove Farm site is weak and indefensible.</p> <p>PC38/39: The case for increasing the housing numbers for the H2.2 (White Horse Business Park) site is not supported by evidence and hence should revert to 150 dwellings</p>		
9 Joint response	North Bradley and Market Lavington Neighbourhood Plan Steering Groups	Same representation as submitted by the respective parish councils. Please see above.	As above	As above
10	Marlborough Town Council	It is noted 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.	Paragraph 4.13 of the Wiltshire Core Strategy states that ' <i>it will also be the prerogative of the community to review settlement boundaries through a neighbourhood plan.</i> '	No changes

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Response number	Councillor/ Town or parish council	Summary of response	Officer response	Proposed change
11	Warminster Town Council	<p>Remove change 24 to Warminster settlement boundary as Warminster Town Council are opposed to any change to the settlement boundary in the Grovelands area.</p> <p>Item 24 from Warminster Town Council's response to the pre-submission Wiltshire Housing Site Allocations Plan consultation is as follows:</p> <p>“24: Settlement Boundary area E6 to G5</p> <p>This area known an 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.”</p>	<p>Item 24 from Warminster Town Council's response to the pre-submission Wiltshire Housing Site Allocations Plan consultation is as follows:</p> <p>“24: Settlement Boundary area E6 to G5</p> <p>This area known an 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.”</p> <p>This area is the subject of planning application 17/05360/OUT, which has now been permitted. The area is not included within the proposed submission settlement boundary for Warminster. Unimplemented planning permissions are excluded from settlement boundaries under the revised settlement boundary review methodology (June 2017).</p>	No changes
12	Marlborough Area Neighbourhood Plan Steering Group	<p>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.</p> <p>Mildenhall is again not listed as a village in the table at 2.3 of the <i>Community Area</i></p>	<p>Paragraph 4.16 of the Wiltshire Core Strategy (adopted January 2015) states that '<i>any existing settlement boundaries for Small Villages and other small settlements not identified in the settlement strategy will be removed (these are listed in Appendix F), and there is a general presumption against development outside the defined limits of</i></p>	No changes

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		<p><i>Topic Paper for Marlborough - 2018.</i> (Mildenhall is not listed anywhere in the current WCS either).</p> <p>The Settlement Boundary may change through the Neighbourhood Plan process.</p>	<p><i>development of the Principal Settlements, Market Towns, Local Service Centres and Large Villages.'</i></p> <p>Manton is classified separately from Marlborough as a small village under Core Policy 14 of the Wiltshire Core Strategy (adopted January 2015) and, therefore, no longer has a settlement boundary.</p> <p>Mildenhall is a small settlement that is not identified in the settlement strategy and, therefore, does not have a settlement boundary.</p> <p>Paragraph 4.13 of the Wiltshire Core Strategy states that 'it will also be the prerogative of the community to review settlement boundaries through a neighbourhood plan.'</p>	
13	Laverstock and Ford Parish Council	<p>Inclusion of OM003 The Yard, Hampton Park</p> <p>The Parish Council believes that it is unreasonable 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.</p>	<p>Comments noted. This site came forward as a new site in the Summer 2017 Pre-submission consultation and was subject to assessment of the potential effects of developing the site. The site is reasonably small, is previously developed with a large disused agricultural building and sits between Hampton Park and the Country Park. The site scored well in the site assessment and there are considered to</p>	No changes

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Response number	Councillor/ Town or parish council	Summary of response	Officer response	Proposed change
		<p>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.</p> <p>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</p>	<p>be no significant constraints that would prevent the site from being allocated.</p> <p>As set out in the Wiltshire Core Strategy (adopted January 2015) and the Housing Land Supply Statement (Updated March 2018), the Southern Wiltshire Community Area remainder and Southern Wiltshire Community Area exclude any development at Old Sarum or extensions to Salisbury into this Community Area, as these are classified as Salisbury Principal Settlement.</p>	

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		<p>included within the Salisbury Settlement Area.</p> <p>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.</p>		
14	Hilperton Parish Council	<p>Hilperton Parish Council endorses the resolutions agreed by Trowbridge Town Council and submitted to this consultation.</p> <p>Hilperton Parish Council object to the following allocations:</p> <p>SHELAA site 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.</p> <p>SHELAA site 298 North Bradley Gap, located in North Bradley parish.</p>	<p>The WHSAP recognises the issue of coalescence and states in the Trowbridge Community Area (page 91) that development at this site ‘is largely shaped by the urbanising effect of Elizabeth Way, development proposals would need to be carefully designed so as to protect the character and appearance of existing residential stock to the west and north, some of which is Listed and within a Conservation Area. In addition, any subsequent development proposals would need to provide Green Infrastructure connections to existing features on site. Footpaths/Bridleway and areas of open space would need to be included within any masterplan/planning application. These considerations are considered capable of successful mitigation.’</p>	No changes.

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		<p>SHELAA site 3565 Southwick Court Gap, located in Southwick and North Bradley parishes.</p> <p>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.</p> <p>Hilperton Parish Council is confused as to why the capacity of land west of Elizabeth way has increased.</p>	<p>The document (page 116) goes on to draw a distinction between land to the west of Elizabeth Way and states: ‘the land to the east of the road is considered to exhibit a strong relationship in landscape and heritage terms with the village of Hilperton. These matters are considered to be problematic to mitigate, particularly in terms of protecting the separate identity of Hilperton. Therefore, it is recommended that the parcel of site 293 that lies to the east of Elizabeth Way be removed from further consideration. This would leave land to the west of road intact and capable of being annexed to SHLAA sites 263/297 and thereby progressed for the purposes of plan making as an allocation.’</p> <p>The increased number at Elizabeth Way is a result of efficient use of land, as prescribed in the NPPF, which came through representations made on the WHSAP in Summer 2017, from members of the public, the parish council and promoters of the site. It is also because of further evidence to support an increase in units combined with the mapping error for the site whereby the site is not appropriately mapped to the road (Elizabeth Way) which also results in a larger area for consideration.</p>	

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Response number	Councillor/ Town or parish council	Summary of response	Officer response	Proposed change
15	Salisbury City Council	<p>Salisbury City Council (SCC) has responded in relation to the Revised Salisbury Transport Strategy Refresh, to express disappointment that earlier representations to previous versions of the Transport Strategy appear not to have been considered. SCC requests a number of amendments to the Transport Strategy Refresh, including in relation to:</p> <ul style="list-style-type: none"> - Delays in the development of the Churchfields site - Increasing pedestrianisation - Creating walking and cycling links - Better utilisation of the park and ride systems - Improvement of air quality and noise pollution - Exploring opportunities for light rail infrastructure to support neighbouring towns - An economic recovery plan <p>Other concerns include:</p> <ul style="list-style-type: none"> - The Transport Strategy Refresh does not adequately assess the effects of the Netherhampton Road development on the transport system and infrastructure 	<p>The response from Salisbury City Council is welcomed and relates to the Salisbury Transport Refresh. It contains some aspects where the Strategy will be amended accordingly, some aspects which we believe the Strategy already addresses, and some aspects which we do not believe will be implementable within the planned period (up to 2026), however we will look to incorporate these in a wider narrative where possible.</p>	<p>No changes proposed.</p> <p>The draft Salisbury Transport Strategy Refresh will be finalised alongside the draft Wiltshire Housing Site Allocations Plan.</p>

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		<ul style="list-style-type: none"> - Insufficient time allowed for comment on the consultation, and not enough access to evidence - Need to cover Sustrans National Cycle Network cycle routes through Salisbury - Inaccuracies in housing numbers. 		
16	Cllr Ernie Clark (Hilperton)	<p>Wiltshire Council has increased the capacity of the site the 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. The submissions of various developers to increase the allocation have been accepted whilst ignoring the many cogent reasons put forward by other parties to remove the policy altogether.</p> <p>Objects to the allocation of SHELAA 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.</p> <p>The allocation would not maintain open countryside between the town and the village, nor would it protect the character</p>	<p>The proposed allocation at Elizabeth Way is adjacent to the settlement boundary of Trowbridge and whilst it is in the parish of Hilperton it is serving the needs for Trowbridge town.</p> <p>The proposed increase in the deliverable housing quantum at Elizabeth Way represents the desire to ensure that land for development is used efficiently, as prescribed by the NPPF and outlined in representations made on the WHSAP in Summer 2017, from members of the public, the parish council and promoters if the site. In addition, in resolving a mapping error, it is evident that more land is available to the immediate west of Elizabeth Way which can be utilised to deliver a comprehensive development scheme that includes an increased number of dwellings.</p> <p>The WHSAP recognises and seeks to address the issue of coalescence and states in the Trowbridge Community Area (page 91)</p>	No changes

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		and identity of the village as a separate community.	<p>that development at this site ‘is largely shaped by the urbanising effect of Elizabeth Way, development proposals would need to be carefully designed so as to protect the character and appearance of existing residential stock to the west and north, some of which is Listed and within a Conservation Area. In addition, any subsequent development proposals would need to provide Green Infrastructure connections to existing features on site. Footpaths/Bridleway and areas of open space would need to be included within any masterplan/planning application. These considerations are considered capable of successful mitigation.’</p> <p>The document (page 116) goes on to draw a distinction between land to the west of Elizabeth Way and states: ‘the land to the east of the road is considered to exhibit a strong relationship in landscape and heritage terms with the village of Hilperton. These matters are considered to be problematic to mitigate, particularly in terms of protecting the separate identity of Hilperton. Therefore, it is recommended that the parcel of site 293 that lies to the east of Elizabeth Way be removed from further consideration. This would leave land to the west of road intact and capable of being annexed to SHLAA sites 263/297 and thereby progressed</p>	

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			for the purposes of plan making as an allocation.'	
17	Purton Parish Council	Considered at Council meeting. No comments made.	Noted.	No changes.
18	Cllr Ian McLennan (Laverstock, Ford and Old Sarum)	Support for the allocation of The Yard at HamptonPark/Bishopdown Farm. The entrance to the site should be via the shared road which will also be the entrance to the country park. The parish council and landowner agree to a re-sited entrance on Roman Road, rather than use the existing entrance. This will provide better vision in both directions.	Your full support for the allocation of 'The Yard' site is noted. Wiltshire Council Highways team have given support for the access to this site to be via Neal Close but it is acknowledged that the existing planning application for this site shows access as being via Roman Road.	No changes.

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Table 2: Summary of representations received from members of the public and Wiltshire Council response

Response number	Summary of response	Wiltshire Council response	Proposed change
1-10	<p>Winterslow proposed settlement boundary reference (K6, L6)</p> <p>Retain existing settlement boundary around 1 Witt Road, Winterslow. The proposed extension to the settlement boundary in this area includes agricultural buildings and land that are not part of the curtilage of 1 Witt Road. Development of this area/ inclusion within the settlement boundary would be inappropriate because of, among other issues, access and flooding concerns and is not supported by the parish council, neighbourhood plan steering group and local residents. The site is being promoted by the landowners/ developers for inappropriate development.</p>	<p>The extension to the settlement boundary in this area has been included in all previous consultations on settlement boundaries, i.e. the informal consultation with town and parish councils in summer 2014 and the public consultation on the pre-submission draft Wiltshire Housing Site Allocations Plan consultation between July and September 2017. No previous objections have been received to the extension of the settlement boundary in this area. The Council is aware that a planning application has recently been submitted for five houses on this site, to which most, if not all, of these comments appear to be in response. The site has historically been part of the curtilage of 1 Witt Road. The parish council have not raised objections to the principle of development upon this site. The emerging Winterslow Neighbourhood Plan, which does identify this site as a second priority site, is still at an early stage. An area designation has been granted (August 2017), however a draft Plan has not been submitted to the Council. Consequently, it can carry no weight in planning decision making.</p>	No changes
11	<p>Winterslow settlement boundary (F5, G5, F6, G6)</p> <p>Include the entirety of the garden of the property known as Beechwood, Winterslow, within the proposed settlement boundary. The inclusion would be</p>	<p>The exclusion of the entirety of the garden curtilage of this property from within the settlement boundary appears to have been an error. Its inclusion can be supported by the methodology.</p>	Make Proposed Change to include the entirety of the garden of Beechwood within

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	<p>consistent with the methodology that includes ‘<i>the curtilage of a property that relates more closely to the built environment (e.g. a garden) or has limited capacity to extend the built form of the settlement in terms of scale and location.</i>’ The garden, while large, is of a similar size to those of other properties in Winterslow that have been included in their entirety within the proposed settlement boundary. The garden is also registered as a SHLAA site (3408) and is supported as a priority site for allocation in the emerging Winterslow Neighbourhood Plan.</p>		<p>the proposed settlement boundary for Winterslow. (See Appendix 3.)</p>
<p>12</p>	<p>The draft Plan is not sound for the following reasons.</p> <p>Item 2 - The Housing Plan should be a document understood and decided upon by the whole of the Council, not just by Cabinet. The document has not been subjected to the Council’s Overview and Scrutiny function.</p> <p>Item 3 - The Plan does not take sufficient account of the “Consultation”. The report to Cabinet is 395 pages long. Comments were received from almost 1000 people and organisations. The section on the results of consultation amounts to 8 pages. Considerable weight is given to comments from developers, ecological and heritage aspects. Almost nothing is reported about comments from town and parish councils and members of the public.</p> <p>Item 4 - There is no mention in the plan about the character of Wiltshire that the community wishes to see. There should be a discussion about site density, ie homes per hectare. Members should have a say in</p>	<p>Item 2 – The draft Plan will be presented to both Cabinet and Full Council in July 2018. The draft plan must have full Council resolution to proceed to submission.</p> <p>Item 3 – The Regulation 22 (1) (c) Report (May 2018) - Consultation Statement provides a full statement of all representations made. Each comment is considered on an individual basis and have been fully taken into account in the preparation of the submission draft plan. However, not all comments submitted will result in a change to the plan.</p> <p>Item 4 – The draft Wiltshire Housing Site Allocations Plan (WHSAP) sits as a daughter document of the adopted Wiltshire Core Strategy (WCS). The WCS sets out how the County will develop in the plan period which is up to 2026, providing detailed descriptions for each community. Any decisions made on planning applications will need to be in conformity with the development plan as a</p>	<p>No changes</p>

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	<p>this. The site density in many cases has increased by up to 65% (PC43) with minimal explanation.</p> <p>There is no discussion about the density of population in community areas; no discussion about the percentage of undeveloped land within community areas that should be left undeveloped to provide an interesting and attractive environment. One might expect that both of these measures would help to assess the future quality of Wiltshire. One should expect an environment designed on the principles of the Garden Cities.</p> <p>Item 5 - Support the protection of Bechstein and other bats. However, the hedgehog appears to have been forgotten. Many existing houses have gardens large enough to allow some space to be unkempt and provide for hedgehogs. With a very high density development there will be minimal opportunities offered for hedgehog movement through them. The results of surveys carried out in 2015 showed a worrying decline. Hedgehogs are a protected species. The ecological aspects of the housing proposals should explain how hedgehogs will be safeguarded.</p> <p>Item 6 - One of the he biggest problems facing the country is handling the extension in life expectancy. Accommodation for the elderly should be a significant part of this report. It is seriously lacking.</p> <p>Item 7 - In the case of several sites around Trowbridge, development is proposed in direct contradiction of the Core Strategy policy to keep open space between Trowbridge and its surrounding villages.</p>	<p>whole. It is therefore unnecessary for the WHSAP to repeat the content of the WCS.</p> <p>The WHSAP provides an estimate of the number of dwellings that could be accommodated on each of the sites. This takes into account site specific constraints. Core Policy 57 of the WCS will ensure that proposals achieve a high quality of design, including appropriate housing densities.</p> <p>Item 5 –The sites in question within the draft WHSAP are in close proximity to the Bath and Bradford on Avon SAC and therefore mitigation must be made for the bats, specifically as the bat species of concern in Trowbridge are Annex II species, which are afforded protection by the SAC European legislation.</p> <p>Hedgehogs are protected under the Countryside and Wildlife Act but not to the level that European Protected Species are. Each site will be subject to an ecological survey at the planning application stage. The ecological survey will identify necessary mitigation measures for relevant protected species to be incorporated into the development.</p> <p>Item 6 – The development plan should be applied as a whole. Core Policy 46 of the WCS specifically addresses meeting the needs of Wiltshire’s vulnerable and older people. Core Policy 45 of the WCS requires provision to be made for mix type and tenure and meeting the</p>	
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	<p>Item 8 - The increase in numbers on many sites is so large that the proposals should go out again for consultation.</p> <p>Elm Grove Farm 1 PC33 and 34 are such extensive changes that this site should go out again for consultation.</p> <p>2 From the point of view of North Bradley residents a woodland buffer should be planted against the A363 to mask the side of Matalan in the Spitfire Retail Park.</p> <p>Land off A363 at White Horse Business Park 1 PC39 is such an extensive increase in numbers that it should go out again to consultation.</p> <p>2 Discussions should take place with North Bradley Parish Council to reach a compromise that will allow the North Bradley Neighbourhood Plan to proceed with its ambition to leave a green landscape gap between North Bradley village and the WHBP.</p> <p>3 The redevelopment of the ex-Virgin car park (brown site) should be promoted to replace the use of the fields (green site). Flats could be considered with a high density to match the proposed change of use from office to residential.</p> <p>4 The parish Council clearly knows the area well, possibly better than the officers and consultants who only make site visits. The Parish Council's expertise should be used.</p> <p>5 Para 3.3 should be explained in terms of a plan, rather than just words.</p>	<p>needs of Wiltshire's vulnerable and older people.</p> <p>Item 7— WCS Core policy 29 (referencing paragraph 5.150) requires that open countryside should be maintained between the town and surrounding villages. With sensitive mitigation and design the draft WHSAP will maintain the status quo.</p> <p>Item 8 – An increase in numbers reflects the requirement as set out in the National Planning Policy Framework (NPPF) to maximise densities and provide efficient use of the land. The principle of development for the proposed allocations has not changed. The changes to the estimated capacity of the sites are not considered significant to warrant further consultation.</p> <p>Elm Grove Farm 1 – The changes to the estimated capacity of the sites are not considered significant to warrant further consultation. 2 – Policy H2.1 of the WHSAP and the supporting text provides appropriate guidance for developers on this issue. Landscape screening will be taken into account at the planning application stage.</p> <p>Land off A363 at White Horse Business Park 1 - The changes to the estimated capacity of the sites are not considered significant to warrant further consultation.</p>	
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	<p>Ecology The Plan is clearly premature. It is anticipating a suitable Mitigation Strategy but this presumably will be subject to consultation and a suitable result is not ensured. For example, the effects of the plan on the hedgehog population in the Wiltshire Council area has not been considered.</p> <p>Heritage Whether the proposals are considered less than substantial depends on the viewpoint. To an authority anxious to boost housing numbers “less than substantial” is satisfactory. However, local residents might well argue that the effect will be very substantial. Surely it is the viewpoint of the local resident who lives with the situation day after day rather than the consultant who might spend an hour or less on site which should take precedent.?</p> <p>Road Conditions Highways England has commented that there could be a cumulative impact of traffic increase on A36. There does not appear to be any similar comment from the Highways section of Wiltshire Council on the effects of traffic generated by Elm Park Farm and the A363 WHBP development on A363 and other roads in the Trowbridge network. Is the Council not interested in potential worsening of congestion along Bradley Road?</p>	<p>2 – The WHSAP has been under preparation since 2014. This has given neighbourhood planning groups sufficient time to prepare a Neighbourhood Plan for their area.</p> <p>3 – The conversion of office to residential has been granted under permitted development or ‘prior approval’ rights. Further development of the land for housing would result in the further loss of important employment land for the area and therefore is currently not supported.</p> <p>4 – the parish councils have been consulted at various times during the process of formulating the draft WHSAP.</p> <p>5 – Paragraph 3.3 references the use of a consistent methodology across Wiltshire to determine the definition of and extent of built up areas in the county.</p> <p>Ecology The Trowbridge Bat Mitigation Strategy (TBMS) is being developed to address the requirements of the Habitats Regulations Assessment. The TBMS will form part of the evidence base for the WHSAP specifically to deal with this issue. The evidence base does not indicate that a specific mitigation strategy is required for hedgehogs.</p> <p>Heritage The test of substantial harm is established in paragraphs 132 and 133 of the NPPF.</p>	
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		<p>Ultimately the it is the responsibility of the decision maker to judge whether or not harm would be substantial, in consultation with Historic England, Conservation Officers, parish councils and other statutory consultees.</p> <p>Highways A transport Assessment for Trowbridge was commissioned and undertaken, and published as part of the supporting documents of the draft WHSAP.</p>	
13	<p>Objects to planned development at The Yard having any access or egress onto Roman Road (Ford Lane). It is a rural lane already heavily used by modern traffic and is unsuited for a large volume of modern traffic. Access should be through Neal Close where access is best afforded.</p>	<p>Your comments are noted. The ‘Schedule of Proposed Changes’ to the Plan include this new site allocation ‘<i>The Yard</i>’ and it is stated that ‘<i>Access to the site would be achieved via Neal Close.</i>’ The site assessment noted that access is possible through Neal Close and this was supported by Wiltshire Council Highways. The Plan is not proposing that access to this site is onto Roman Road (Ford Lane).</p>	No changes
14	<p>SHLAA site 3268 - The Spring, Market Lavington</p> <p>Submission of a site assessment prepared by the owner of site and how this fits with the strategy of the Neighbourhood Plan.</p> <p>It rebuts the arguments set out by the Council for excluding the site on the grounds of site storm water drainage, level of the B3098 public highway and public support.</p>	<p>The site has been subject to extensive site assessment, the outcomes of which have been published as part of the Devizes Community Area Topic Paper. The conclusion not to allocate The Spring (SHELAA site 3268) at Market Lavington is because the costs are not thought to be outweighed by the potential benefits. It is thought that a limited number of dwellings would be deliverable at this site due to the constraints and as such it is likely that it would not contribute to provision of affordable housing.</p>	No changes

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<p>15</p>	<p><i>[Full response can be found in Appendix 2. Summary of key points raised is provided below]</i></p> <p>Original comments submitted to the Council were not retained verbatim but were split into separate comments which did not reflect the content and arguments set out in the letter.</p> <p>Further consultation should be undertaken to allow comments to be submitted on the use of the Queen Elizabeth II Grove Field which was dedicated as a Queen Elizabeth II field in 2012, as part of a scheme to celebrate the Queens diamond jubilee and to create a grassroots legacy after the London Olympics. The papers reported that “Coulton Estates are looking to build 200 homes at Elm Grove Farm, off Drynham Lane, and Wiltshire Council’s strategic planning officers have recently been talking to them about building a school on the nearby Elm Grove field, to help with the town’s primary school shortage”. Elm Tree Farm is Site 613 in the Draft Housing Site Allocations Plan. This use of Elm Grove Field right next to Site 613 was not mentioned in the Draft Plan, therefore no public consultation has occurred, even though it should clearly have been included at that time.</p> <p>This playing field was dedicated in perpetuity as a playing field, yet within a mere 6 years of the signing of the Deed of dedication your department is considering allowing it to be built upon, without public consultation,</p>	<p>The draft WHSAP and all comment received to date have been published in full and reported on within the Regulation 22 (1) (c) Report (May 2018) - Consultation Statement provides a full statement of representations made verbatim and also in a summary of the issues raised.</p> <p>The Inspector appointed to undertake the Independent Examination of the submitted WHSAP will be provided with the full content of all comments received, including the comments submitted in response to this consultation. The Examining Inspector will refer to the comments received determining the matters to be debated at the hearing sessions.</p> <p>There is an existing need for a two-form entry main stream primary school in Trowbridge. The draft Plan seeks to bring this forward at site allocation H2.1 Elm Grove Farm as no other alternative site has been identified to meet the need of the town within the plan period.</p>	<p>No changes</p>
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	<p>and in clear defiance of the original intention. This is disgraceful.</p> <p>As a local resident in the Drynham Ward I object strongly to this even being considered. There are 7 schools already within a one-mile radius of this site, so it is highly questionable whether yet another school is needed on this side of Trowbridge. Wiltshire Council would need consent from Fields in Trust for this to go ahead, and must also provide an alternative piece of land with equivalent or better facilities in the same area.</p> <p>We do not need or want a school on this site, which is dedicated playing field, and large open green area for Drynham residents, the only one of any size left in our area.</p> <p>I would like this letter to go before the Cabinet or Council meeting in July when the Draft Plan is considered.</p>		
16	<p>Response given in Appendix M of the Regulation 22 Consultation Statement require further detail.</p> <p>The responder commented on the following proposed changes:</p> <p>Proposed Change 15/16 - It is unclear why the entirety of the Churchfields site is being deferred to 'beyond 2026'. It is a prime candidate for a high-density development.</p> <p>Proposed Change 74 - the Salisbury Transport Strategy refresh is not completed. The final version</p>	<p>The council is not obligated to provide detailed responses to all representations made. The purpose of the Regulation 22 (1) (c) Report (May 2018) - Consultation Statement is to summarise the main issues of concern for the draft WHSAP. Some issues raised do not fall under the remit of the draft WHSAP and cannot be addressed by this document.</p> <p>PC15/PC16 – the Churchfields site is allocated as a strategic site in the Wiltshire Core Strategy but the WHSAP acknowledges the complexity of bringing this site forward for</p>	No changes

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	<p>needs to be available to see whether the proposed interventions have been successful.</p> <p>The right is reserved to make further comments when there is an appropriate opportunity for the public to do so.</p>	<p>mixed-use development within the Plan period (to 2026). The location of this site in proximity to the railway station and city centre are acknowledged but alternative sites for housing have had to be allocated in Salisbury in the WHSAP to meet housing needs in the absence of housing delivery at Churchfields.</p> <p>PC74 – Your comments in respect of the draft Salisbury Transport Strategy Refresh are duly noted. As the Plan progresses through the Examination process, so the draft Transport Refresh will be progressed. It is still in draft form at the current time until the Examination process is completed. The concerns expressed in your submission are acknowledged and we will endeavour to find practical solutions wherever practicable.</p> <p>Your comments regarding making further comments in the future when there is opportunity to do so are noted.</p>	
17	<p>The proposed changes provided the Council with an opportunity to address the fundamental conflict between the draft Market Lavington Neighbourhood Plan and the draft Plan, a conflict that we had drawn attention to in our pre-submission representations. That conflict has been amplified since the pre-submission consultation because of the considerable progress that the neighbourhood plan has made and the delay in progressing the draft Plan.</p>	<p>The site has been subject to extensive site assessment, the outcomes of which have been published as part of the Devizes Community Area Topic Paper.</p> <p>With regard to the proposed allocation H1.2 (Underhill Nursery) (PC30) officers recommended that only the site area be increased. This was recommended to accommodate a substantial green infrastructure buffer and provision for access/egress. It is recognised that the</p>	No changes

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	<p>Response objects to the proposed increase in the size of Housing Site Allocation H1.2 (Underhill Nursery) (PC30) for the following reasons:</p> <ol style="list-style-type: none"> 1. The pre-submission draft plan (July 2017) proposed that the Underhill Nursery site allocation should accommodate 50 dwellings (Policy H1). The Plan at Annex A of the Draft Plan shows that the Proposed Change (PC30) increases the size of the allocated site area by about 50% - and yet Table 4.4 (at Paragraph 4.28) still indicates that the allocation will accommodate approximately 50 dwellings 2. The increase in the size of this proposed allocation is directly contrary to the clearly expressed views of the Community; namely that further growth at Market Lavington should be accommodated in a few small sites dispersed around the village. Increasing the size of the Underhill Nursery Allocation will also exasperate further the environmental impact that will be caused by an urban extension in this area. In particular, in our opinion the larger site will result in a “high to medium adverse” landscape and visual impact. We note that the Stage 4a Site Landscape Assessment (June 2017) did not assess the impact of developing the larger site that is now proposed. The larger site will also result in greater traffic impact on the village centre. 3. The revised proposed site access (now to be achieved by demolishing one half of a pair of semi-detached dwellings fronting on to Stirling Road) will have a severe and unacceptable impact on the residential amenity of the retained dwellings on either side. The proposed 	<p>proposed additional area of the site <i>could</i> increase the dwelling capacity. However, any new dwelling capacity figure would need to be addressed through the Examination process and based upon robust evidence. Therefore, at this stage, officers would recommend that we retain the phrase: ‘approximately 50 dwellings’ as per the Pre-submission draft Plan. Any significant and substantial changes to the Plan that flow from the Examination process will be subject to public consultation, which be directed by the Inspector</p> <p>Both sites at Fiddington Hill (SHLAA 530 and 2055) were subject to sustainability appraisal which include an assessment of landscape impacts. The potential impacts associated with development at these sites were considered to be capable of being successfully mitigated through careful mitigation and environmental enhancement strategies.</p> <p>Access either at Fiddington Hill or Stirling Road were assessed to be acceptable in Highways terms.</p>	
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	<p>change to the Draft Plan, to provide an alternative access, is a clear acknowledgement that the site cannot be satisfactorily accessed from Fiddington Hill (as had been originally proposal). Whilst the revised access may be acceptable in terms of highway engineering, it would have an unacceptable impact on neighbouring dwellings. A satisfactory access cannot be provided to the Underhill Nursery site.</p> <p>4. We assume that the Council is satisfied that this site is deliverable (ie is achievable and available now) with the revised access arrangement</p>		
18	<p>Upavon settlement boundary reference (I5, J5, I6, J6)</p> <p>The whole of Vicarage Lane should be included within the settlement boundary for Upavon. Vicarage Lane is part of the village and has been for some time. Residents pay Council Tax. We were unaware of the consultation; otherwise we would have submitted a response. The exclusion of Vicarage Lane is anomalous and reasonable a dwelling in such a location would be acceptable.</p>	<p>No responses relating to the settlement boundary review of Upavon were received during the pre-submission consultation.</p> <p>Vicarage Lane consists of a small number of dwellings separated by the River Avon from the main settlement of Upavon and is some distance from a more substantial area of residential development, which includes the primary school, off Andover Lane.</p> <p>Vicarage Lane is not within the existing settlement boundary.</p> <p>Its inclusion would not be supported by the revised settlement boundary review methodology (June 2017), which excludes 'isolated development that is physically detached from the settlement'.</p>	No changes

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