



# Wiltshire Housing Site Allocations Plan

Consultation Statement Regulation 22 (1) (c)

July 2018  
Submission version

## Wiltshire Council

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# 1 Introduction

- 1.1** Once adopted, the Wiltshire Housing Site Allocations Plan, 'the Plan' will form part of the Development Plan for Wiltshire. It is being prepared to support the delivery of the Spatial Strategy set out within the Wiltshire Core Strategy (adopted January 2015).
- 1.2** The purpose of the Plan is to:
- Allocate sites for housing to ensure the delivery of homes across the plan period in order to maintain a five year land supply in each of Wiltshire's three HMAs over the period to 2026; and
  - Revise, where necessary, settlement boundaries in relation to the Principal Settlements of Salisbury and Trowbridge, Market Towns, Local Service Centres and Large Villages.
- 1.3** The Plan has appraised site options and settlement boundaries across Wiltshire, excluding Chippenham. The planned development of Chippenham is addressed in a separate plan - the Chippenham Site Allocations Plan (adopted May 2017) <sup>(1)</sup>
- 1.4** The methodology and evidence to support the decisions made by the Council in respect of the proposed site allocations and settlement boundary review are set out in Topic Papers and supporting documents <sup>(2)</sup>. Where necessary, evidence base documents (e.g. Topic Papers) have been updated to correct factual errors, or address points raised through representations submitted during the formal consultation stage.

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1 The Chippenham Site Allocations Plan can be found on this link: <http://www.wiltshire.gov.uk/chippenhamsiteallocationsplan.htm>

2 The Topic Papers and supporting documents for the draft Wiltshire Housing Sites Allocations Plan can be found on this link: <http://www.wiltshire.gov.uk/planningpolicydocuments.htm?directory=Wiltshire%20Housing%20Site%20Allocations%20DPD/Pre-Submission%20Consultation%20July%202017>

## 2 Regulatory context for plan making – effective and meaningful consultation and engagement

- 2.1** Section 18 of the Planning and Compulsory Purchase Act 2004 <sup>(3)</sup> requires local planning authorities to prepare a ‘Statement of Community Involvement’ (SCI). The SCI explains how the Council will engage local communities and other interested bodies in the production of local plans and the determination of planning applications. Wiltshire Council’s SCI was published in July 2015 <sup>(4)</sup>. The SCI has therefore been instrumental in shaping the way in which the Plan has evolved from inception to submission. Indeed, it will also be used to guide any subsequent consultation required through the Examination process on matters such as ‘Main Modifications’ to the Plan.
- 2.2** Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012 <sup>(5)</sup> (TCPER) specifies the consultation that the local planning authority must undertake before it can proceed to publish a ‘publication’, or ‘pre-submission’ version of the Plan.
- 2.3** The TCPER also require that, at the point the Plan is submitted for independent examination, it is supported by a statement setting out:
- 2.4** *Regulation 22 (1)(c)*
- i. Which bodies and persons were invited to make representations under regulation 18;*
  - ii. A summary of the main issues raised by those representations;*
  - iii. How those main issues have been addressed in the local plan.*
- 2.5** The TCPER also require that, at the point the Plan is submitted for independent examination, it is supported by a statement setting out:
- v. If representations were made pursuant to regulation 20, the number of representations made and a summary of the **main issues** raised in those representations [emphasis applied].*
- 2.6** The consultation exercises undertaken by the Council have provided early, effective and meaningful engagement with what the TCPER and our SCI define as ‘specific’ and ‘general consultation’ bodies in accordance with the guidance set out in the National Planning Policy Framework (NPPF) <sup>(6)</sup> and the Planning Practice Guidance (PPG) <sup>(7)</sup>. This has included the ‘prescribed bodies’ and neighbouring local planning authorities, as required by the general duty to cooperate.
- 2.7** The Council has proactively engaged with ‘prescribed bodies’ through the legal duty to cooperate established through section 33A of the Planning and Compulsory Purchase Act 2004 (as inserted by section 110 of the Localism Act 2011). Further detail can be found in the Council’s Duty to Cooperate Report (June 2017) and the Addendum Update (May 2018).

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3 <https://www.legislation.gov.uk/ukpga/2004/5/contents>

4 Wiltshire Statement of Community involvement can be found on the following link:  
<http://www.wiltshire.gov.uk/statementofcommunityinvolvement.htm>

5 <http://www.legislation.gov.uk/uksi/2012/767/contents/made>

6 <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

7 <https://www.gov.uk/government/collections/planning-practice-guidance>

**2.8** Following the early consultation and engagement activities carried out under Regulation 18 of the TCPR, a regulation 19 public consultation was undertaken on the pre-submission draft Plan in the summer of 2017. Details in respect of this important phase of plan preparation are set out in Section 5 of this Statement.

## 3 How to use this document

3.1 This Regulation 22 Statement is broken down into a series of sections and appendices that cover how the Council has prepared the Plan, as follows:

- **Section 4** summarises the Regulation 18 consultations that were carried out to inform the early-stages of Plan preparation. This included consultation on the scope of the Plan; the methodology for the site selection process and settlement boundary review; informal consultations on early proposals; landowner site availability consultations; and consultation with neighbouring authorities to fulfil the Council's duty to cooperate.
- **Section 5** gives a broad overview of the outcome of the formal Regulation 19 consultation on the 'pre-submission' version of the Plan undertaken during the summer of 2017.
- **Section 6** provides an overview of the representations received through the Regulation 19 consultation.
- **Section 7** sets out a summary of what the Council consider to be the main issues arising from this consultation, and the Council's proposed response to these issues.
- The **Appendices** to this Statement set out further details in respect of the Regulation 19 consultation.



## 4 Early consultation on the draft Wiltshire Housing Site Allocations Plan

- 4.1 Table 1 below summarises early engagement exercises that have been carried in accordance with Regulation 18 of the TCPR prior to the formal 'pre-submission' (Regulation 19) consultation on the draft Plan.

Table 4.1 Early engagement exercises for the Wiltshire Housing Site Allocations Plan

Summary of consultation	Dates
<p><b>Formal "Regulation 18" consultation on the scope of the draft Plan.</b></p> <p>Comments were invited on the scope of the Plan during a six week consultation period. As part of this consultation developers were invited to submit sites for consideration through the Council's Strategic Housing Land Availability Assessment (SHLAA).</p> <p>This consultation included neighbouring authorities and prescribed bodies in line with the general duty to cooperate.</p>	<p>24 March - 5 May 2014</p>
<p><b>Informal consultation with town and parish councils on draft proposals for amending settlement boundaries</b></p> <p>To inform the Settlement Boundary Review element of the Plan, the Council undertook an informal consultation with parish and town councils whose area included settlements with existing boundary lines.</p> <p>Comments were invited on the methodology and draft proposals relating to the review of settlement boundaries over an 8-week period.</p> <p>As part of this consultation, the Council hosted briefing sessions for those parishes affected by the settlement boundary review process at venues in Calne, Salisbury and Trowbridge.</p> <p>The decision to directly engage with just town and parish councils at that early stage of the process was taken because they are elected to represent their respective communities and have detailed knowledge of their local area. However, the Council made the consultation materials publically available. Other consultees submitted representations and the Council considered these in the review of the methodology.</p>	<p>28 July - 22 September 2014</p>
<p><b>Informal consultation on the site assessment methodology and initial site options.</b></p> <p>This consultation included neighbouring authorities and prescribed bodies. Following consultation on the settlement boundary review element of the Plan, the Council undertook an informal consultation on the draft methodology for the identification of housing sites and initial site options.</p> <p>As part of this consultation, the Council again hosted briefing sessions at each of the three Wiltshire Housing Market Areas (HMAs) - Chippenham (North and West HMA), Devizes (East HMA) and Salisbury (South HMA).</p>	<p>23 February - 31 March 2015</p>

<p>The council also invited town and parish councils to attend one-to-one sessions with the Council to discuss how the Plan affects their area.</p> <p>In addition to the consultation targeted at town and parish councils, the Council held a workshop event for developers and landowners in Trowbridge, and invited comments on the draft methodology.</p>	
<p><b>Informal consultation on the approach to Large Villages.</b></p> <p>Following on from the consultation on the site assessment methodology which asked town and parish councils if they considered housing sites should be identified in Large Villages, the Council undertook a further, informal consultation on the Plan to provide another opportunity for parish councils with Large Villages to input into the preparation of the Plan.</p> <p>A questionnaire and site maps, which showed the location of all of the SHLAA sites in Large Villages, were emailed to all 66 parish councils with Large Villages, inviting comments on each of the SHLAA sites and asking a series of questions including: if they were preparing a neighbourhood plan and what progress had been made with it; what they considered an acceptable level of housing growth in their Large Village up to 2026 would be; and their views on the identification of housing sites in their Large Village.</p>	<p>30 June - 12 August 2015</p>
<p><b>Landowner deliverability consultation.</b></p> <p>The Council contacted the landowners or promoters of all SHLAA sites that had been carried forward after the application of the strategic assessment criteria. This stage of the process was applied to eliminate any sites that were not suitable and did not meet the criteria for further assessment.</p> <p>The Council requested confirmation that the land was firstly available; and that development would be achievable and deliverable within the plan period in order to maintain the rolling 5-year housing land supply position in each Housing Market Area.</p>	<p>February 2015 and August 2015</p>
<p><b>Consultation with neighbouring authorities.</b></p> <p>Following on from previous discussions with neighbouring authorities, the Council carried out targeted consultation with neighbouring authorities to ensure any issues of a strategic or cross boundary nature were identified, and to help fulfil the Council's duty to cooperate with bodies representing issues beyond the county boundary.</p>	<p>13 - 24 June 2016</p>

**4.2** Detailed information on the previous (Regulation 18) stages of consultation can be found in the following documents which supported the pre-submission draft Plan:

- *Statement of Early Community Involvement* (June 2017). <sup>(8)</sup> This report provides an overview of earlier consultation.

8 <http://www.wiltshire.gov.uk/planning/policy/document?directory=Wiltshire%20Housing%20Site%20Allocations%20DPDP%20Pre-Submission%20Consultation%20July%202017&file=15>

- *Report on the Regulation 18 consultation 24<sup>th</sup> March-5<sup>th</sup> May 2014* <sup>(9)</sup>
- *Statement on the informal consultation with town and parish councils on draft proposals for amending settlement boundaries 28<sup>th</sup> July-22<sup>nd</sup> September 2014* <sup>(10)</sup>
- *Report on the informal consultation on the approach to Large Villages 30<sup>th</sup> June-12<sup>th</sup> August 2015* <sup>(11)</sup>
- *Report on Landowner Deliverability Consultation 21<sup>st</sup> August-2<sup>nd</sup> October 2015* <sup>(12)</sup>
- *Duty to Cooperate Statement (June 2017)* <sup>(13)</sup>

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9 <http://www.wiltshire.gov.uk/planningpolicydocument?directory=Wiltshire%20Housing%20Site%20Allocations%20DPDPre-Submission%20Consultation%20July%202017&file=16>

10 <http://www.wiltshire.gov.uk/planningpolicydocument?directory=Wiltshire%20Housing%20Site%20Allocations%20DPDPre-Submission%20Consultation%20July%202017&file=20>

11 <http://www.wiltshire.gov.uk/planningpolicydocument?directory=Wiltshire%20Housing%20Site%20Allocations%20DPDPre-Submission%20Consultation%20July%202017&file=17>

12 <http://www.wiltshire.gov.uk/planningpolicydocument?directory=Wiltshire%20Housing%20Site%20Allocations%20DPDPre-Submission%20Consultation%20July%202017&file=19>

13 <http://www.wiltshire.gov.uk/planningpolicydocument?directory=Wiltshire%20Housing%20Site%20Allocations%20DPDPre-Submission%20Consultation%20July%202017&file=14>

## 5 Publication of the pre-submission draft Wiltshire Housing Site Allocations Plan

**5.1** In June 2017, Wiltshire Council's Cabinet resolved<sup>(14)</sup> that the draft Plan and its supporting evidence base should be published for public consultation under Regulation 19 of the TCPR. The consultation was comprehensive and followed the prescription outlined in Wiltshire Council's Statement of Community Involvement (SCI). It provided members of the public and interested parties the opportunity to comment on the 'soundness' of the draft Plan before submission to the Secretary of State for independent examination, and is a requirement under Regulation 19 of the TCPR. In particular, consultees were asked to comment on matters of 'soundness'<sup>(15)</sup> so whether the draft Plan was:

1. Justified;
2. Effective; and
3. Consistent with national policy.

**5.2** The council invited consultation responses over a **10-week period**, which ran from **Friday 4 July 2017 until Friday 22 September 2017**. The consultation period was longer than the standard 6 weeks set out in the SCI, to address the summer holiday period and thereby provide as much opportunity as possible for people to engage with the draft proposals.

**5.3** In accordance with Regulation 22 (1)(c) of the TCPR this section sets out who was consulted, and how these consultees were informed about the consultation.

### **5.4 Who was consulted?**

**5.5** In line with the SCI<sup>(16)</sup> the following organisations, groups and individuals were notified of the start of the consultation period by email or letter in accordance with Regulation 19. Statutory consultees, including the Environment Agency, Natural England, Historic England, NHS and Highways England as well as:

- Neighbouring local authorities
- All parish and town councils
- Parish and town councils adjacent to Wiltshire
- Wiltshire Councillors and Area Board Managers
- The housing industry
- Land and planning agents
- Landowners

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14 <http://cms.wiltshire.gov.uk/documents/g11096/Printed%20minutes%2020th-Jun-2017%2009.30%20Cabinet.pdf?T=1>

15 National Planning Policy Framework, paragraph 182

16 <http://www.wiltshire.gov.uk/statementofcommunityinvolvement.htm>

- General consultees, e.g. schools, MP/MEPs, the military, police authority, community groups
- Individuals and community groups who had previously requested to be informed about updates relating to the Plan.

## 5.6 How were people consulted?

**5.7** Consultees were made aware or formally notified of the consultation through a variety of means in accordance with the provisions of Regulations 19 and 35 of the TCPR. Contact was made with consultees on Wiltshire Council's Spatial Planning database which, in addition to the statutory and general consultees listed in the SCI, included those who have submitted comments during previous spatial planning consultations (including on the Wiltshire Core Strategy). It also included all who have expressed an interest in previous planning documents, and those who had asked to be kept informed about the progress of the Plan.

**5.8** In total, **10,461 consultees** were directly contacted. This included **8,663** consultees contacted by email and **1,758** consultees contacted by post. A copy of the letter and email that was sent to consultees can be viewed at **Appendix A**.

**5.9** In addition to this, opportunities for engagement with the consultation process were extended through :

- Early notification to Parish and Town Councils following Cabinet approval (see **Appendix B**)
- Publication of notice placed in local newspapers across the county (see **Appendix C**)
- Announcement of the consultation on the Council's website and on 'Our Community Matters' website (see **Appendix D**)
- Press releases about the consultation from the Council's Facebook and Twitter accounts (see **Appendix E**)
- Bulletins about the consultation made available to Community Area Boards (see **Appendix F**)
- Weekly updates in Parish Council and Town Council newsletters (see **Appendix G**)
- Announcement on the email bulletin to all Wiltshire Councillors (see **Appendix H**).
- External press coverage in local newspapers and radio (see **Appendix I**)

**5.10** Consultees were informed that the 'pre-submission' draft Plan and its supporting evidence base were available to view throughout the consultation period at the following locations:

- In electronic format on the Council's website
- In paper format at Monkton Park (Chippenham) reception
- In paper format at Bourne Hill (Salisbury) reception

- In paper format at County Hall (Trowbridge) reception
- In paper format at all of Wiltshire Council run libraries (list of libraries found at **Appendix J**).

**5.11** To aid consultees in the process of responding to the consultation, the Plan was also supported by a Guidance Note<sup>(17)</sup> which provided instruction on how to submit comments on the Plan.

**5.12** During the first two weeks of the consultation, four public exhibition events were held which allowed members of the public and interested parties to view the consultation material and ask questions of officers who were on hand to advise. A summary of the exhibition venues, times and level of attendance are set out below:

Table 5.1

Date	Time	Location	Approximate number of attendees
17th July 2017	12 noon - 7pm	Neeld Hall, Chippenham	63
19th July 2017	12 noon - 7pm	Guildhall, Salisbury	214
24th July 2017	12 noon - 7pm	Town Hall, Devizes	79
26th July 2017	12 noon - 7pm	County Hall, Trowbridge	306

**5.13** The exhibition board posters and summary leaflet for the exhibition can be found **Appendix K**. The 'rolling presentation' that was on display during the exhibitions' can be found at **Appendix L**.

**5.14** The exhibitions were attended by a range of people with a variety of interests. This included members of the public, parish and town councillors, residents' associations, members of local interest groups/societies, local business owners, members of national interest groups (e.g. CPRE), representatives of the housing industry and the press.

17 <http://consult.wiltshire.gov.uk/file/4616891>

## 6 Representations received

- 6.1** Over the consultation period **3,370 separate comments** were received from **972 contributing consultees**.
- 6.2** One petition consisting of 5 'e-signatures' relating to the proposed housing allocations at Netherhampton Road, Salisbury was received during the consultation period. A further 237 paper-copy signatures were added to this petition after the consultation period had closed.
- 6.3** The comments were processed and logged with unique ID numbers, and placed available to view publicly online on the Council's consultation portal <sup>(18)</sup>. Where necessary, representations from one consultee which dealt with a number of different issues were split into separate comments for ease of analysis. Each and every comment submitted by consultee was given its own ID number.
- 6.4** In the weeks following the close of the consultation period, representations were received from 34 consultees. These comments were logged separately and marked as 'unduly made' representations because they were received outside of the formal consultation period. Whilst these representations were submitted outside the consultation period, they were assessed insofar as they presented information that related to matters common to other representations and hence did not raise new issues. In addressing these late representations directly, the Council considers it acted reasonably and fairly to all representors.

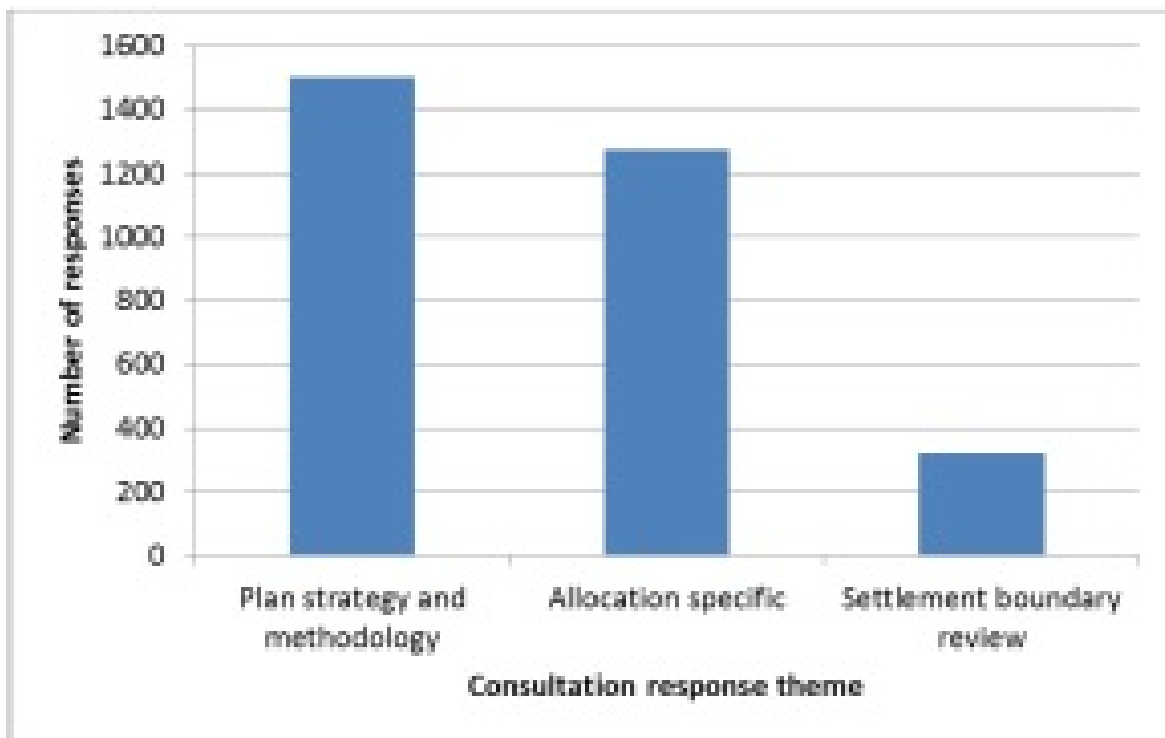
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18 [http://consult.wiltshire.gov.uk/portal/spatial\\_planning/sites\\_dpd/draftwhsap?pointId=4575798](http://consult.wiltshire.gov.uk/portal/spatial_planning/sites_dpd/draftwhsap?pointId=4575798)

## 7 Summary of responses and main issues arising

- 7.1** Section 7 sets out an overview of what are the key or, as described within Regulation 22, 'main issues' arising from the consultation. These are considered to be the main points concerning the potential soundness of the Plan and may form the basis of subsequent examination hearing sessions. This section also includes officer responses to the main issues.
- 7.2** A summary of all the comments that were received during the Regulation 19 consultation that relate to site allocations is included at **Appendix M**. This summary is split into separate tables by themes as they appear in Plan order, and includes reference to the unique ID numbers of the representors who comments on each of the themes.
- 7.3** A summary of all the comments received during the Regulation 19 consultation that relate to the settlement boundary review can be found at **Appendix P**.
- 7.4** A full schedule of the original representations that were submitted to the Regulation 19 consultation is provided in **Appendix Q** and available to view on the Council's website and will be submitted to the Secretary of State along with all other documents prescribed by Regulation 22 of the TCPR and Section 20 of the Planning and Compulsory Purchase Act, 2004.
- 7.5** By way of context, **Figure 7.1** below shows: (i) the number of comments that relate to the overall strategy of the Plan; (ii) the number of comments relating to specific proposed site allocations; and (iii) the number of comments relating to the settlement boundary review.
- 7.6** This shows that most of the comments submitted relate to the proposals for housing allocations and the strategy/methodology that influenced the decisions made by the Council in terms of where land was identified (or not) for future housing. Fewer comments were submitted in relation to the settlement boundary review.

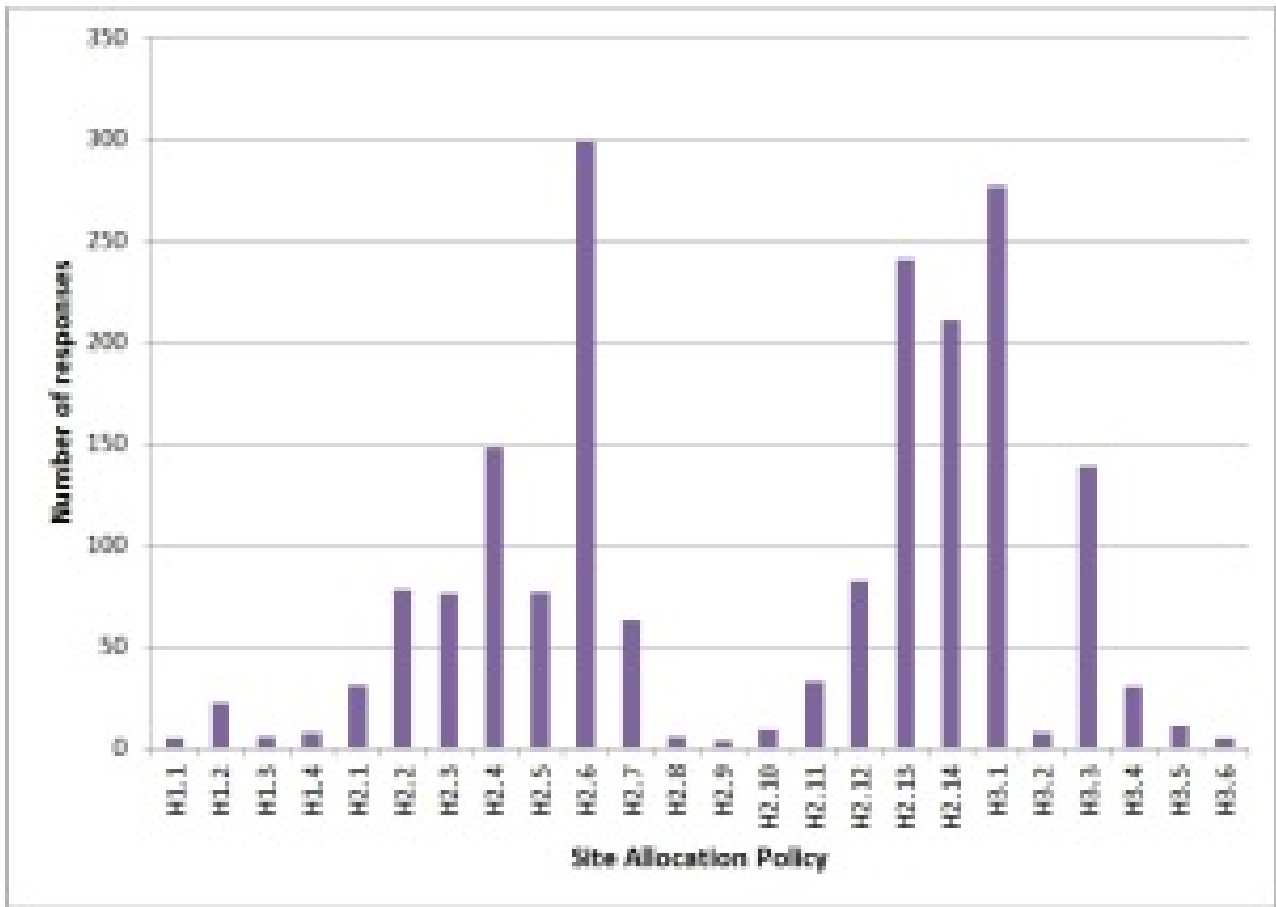
Figure 7.1 Graph showing number of comments on different parts of the draft plan.





7.7 **Figure 7.2** below shows the number of comments that were received which relate to each of the proposed housing allocations.

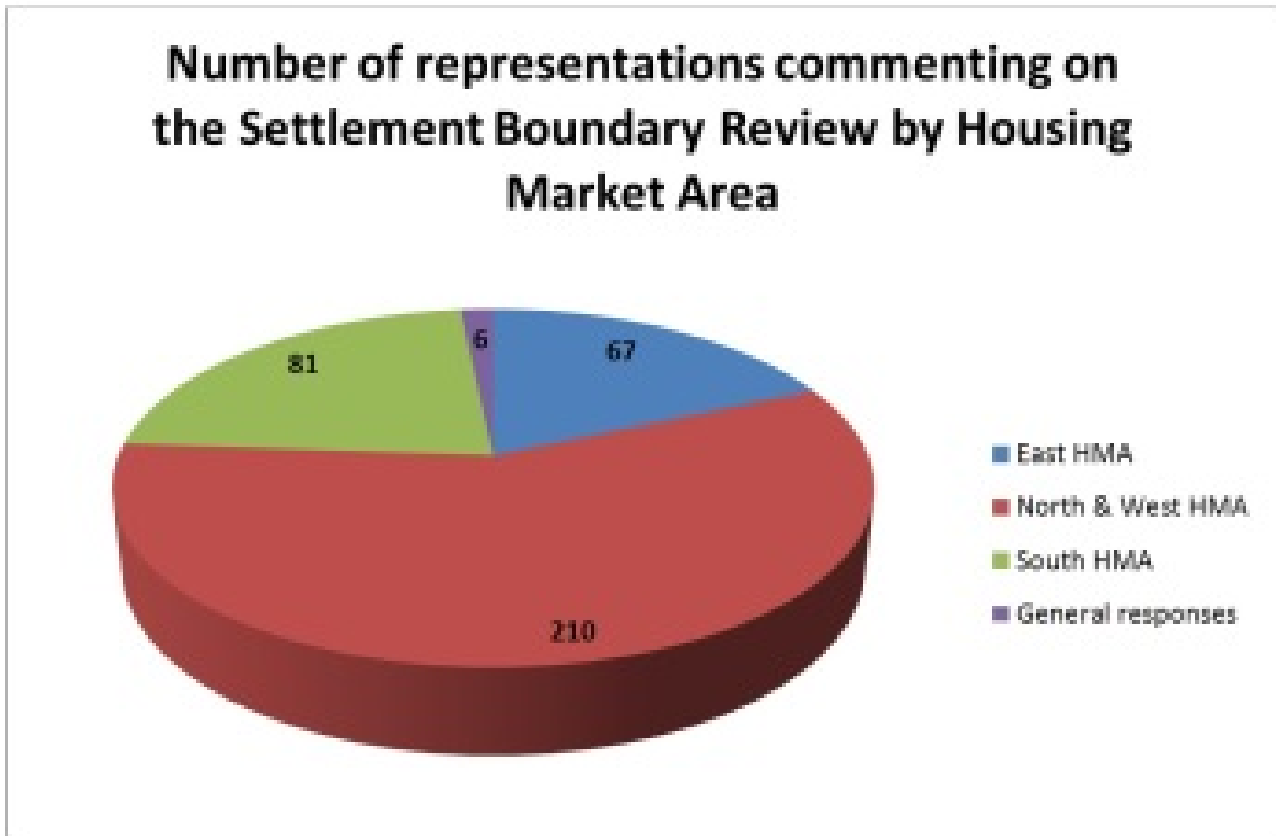
Picture 7.1 Graph showing number of comments on each housing allocation



7.8 This shows that comments were received in relation to every housing site proposed, and that the largest number of comments concerned site allocation H2.6 (Southwick Court, Trowbridge); site allocation H3.1 (Netherhampton Road, Salisbury); site allocation H2.13 (Ridgeway Farm, Crudwell); and site allocation H2.14 (Court Orchard/Cassways, Bratton).

7.9 In relation to the settlement boundary review, **Figure 7.3** below shows the number of comments that were received regarding settlements within each of the Housing Market Areas(HMA).

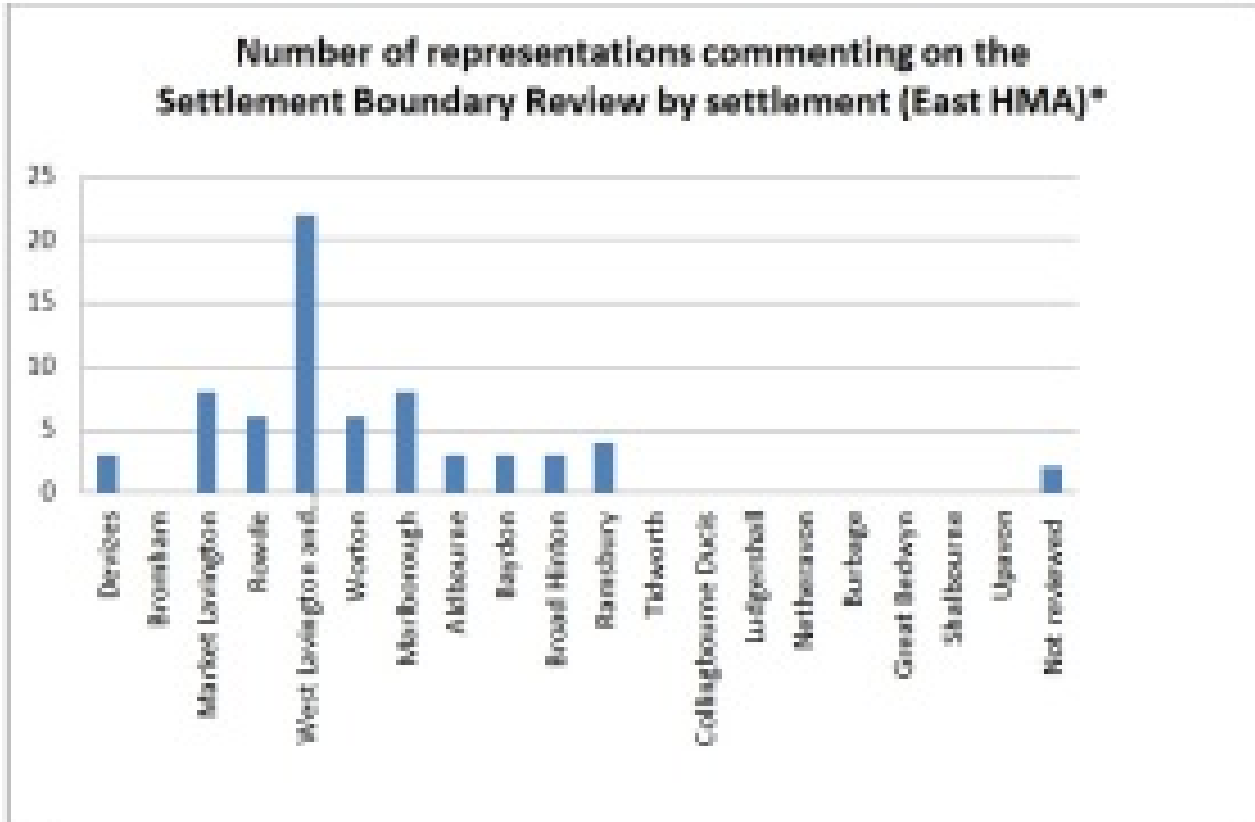
Picture 7.2 Chart showing settlement boundary review comments by HMA.



**7.10** Figures 7.4, 7.5 and 7.6 show the number of comments that were received in relation to the proposed settlement boundary amendments, split by the three Housing Market Areas in Wiltshire. The three graphs present a breakdown of the number of comments for each settlement boundary that was reviewed (or not reviewed).<sup>(19)</sup>

<sup>19</sup> 'Not reviewed' refers to settlements where the settlement boundary has not been reviewed by the Plan. This includes Small Villages where no boundary exists; settlements where the settlement boundary has been reviewed by a sufficiently advanced/made' neighbourhood plan; or Chippenham, where the settlement boundary was reviewed by the CSAP.

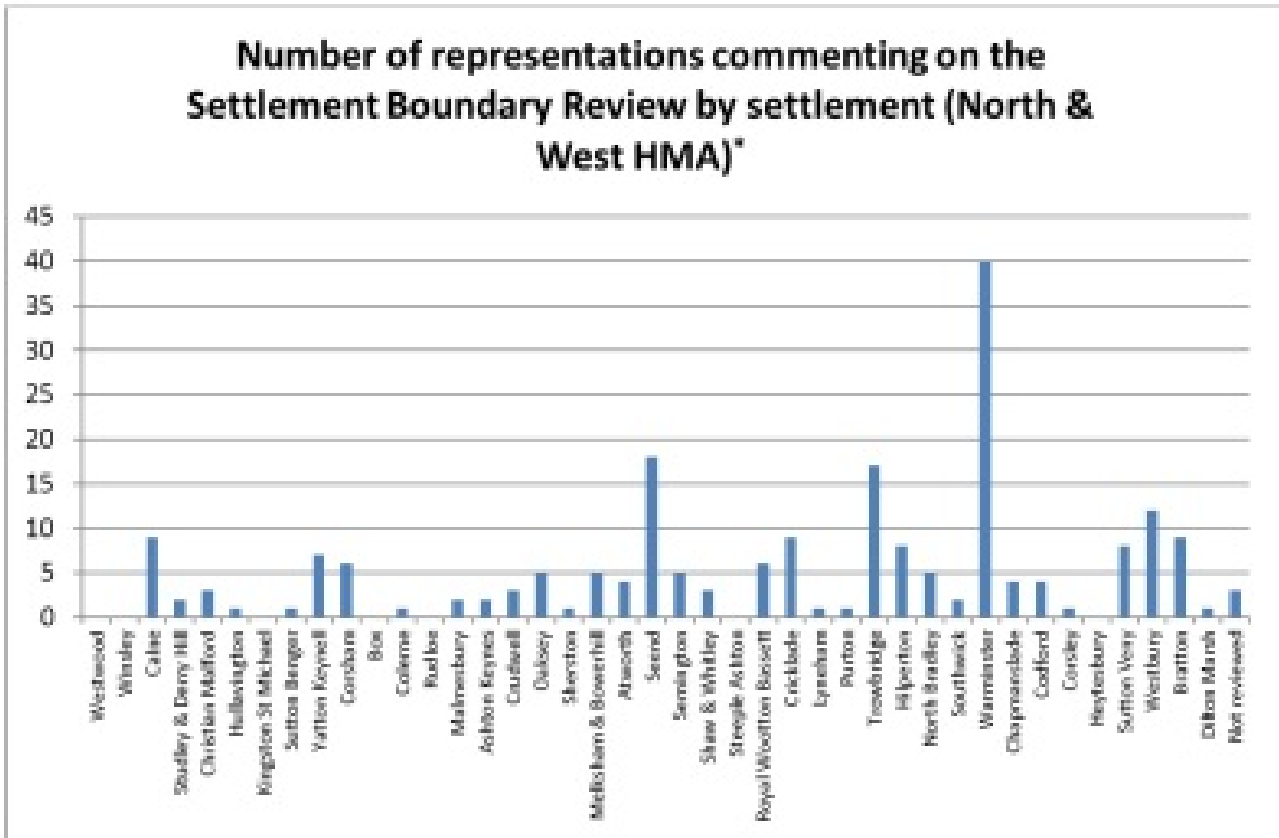
Picture 7.3 Graph showing comments to settlement boundary reviews in the East HMA.



\* The total number of representations by settlement is higher than for the HMA because one representation commented on more than one settlement.

**7.11** In the East Housing Market Area, proposed amendments to the settlement boundaries for settlements in the Devizes Community Area attracted the most comments, particularly for West Lavington and Littleton Panell. There were some comments on the proposed amendments for settlements in the Marlborough Community Area but none at all for those in the Tidworth Community Area. However, the informal consultation undertaken between July and September 2014 provided town and parish councils with the opportunity to comment on draft proposals for amendments to settlement boundaries. These comments then informed the proposed amendments to the settlement boundaries in the draft Wiltshire Housing Site Allocations Plan.

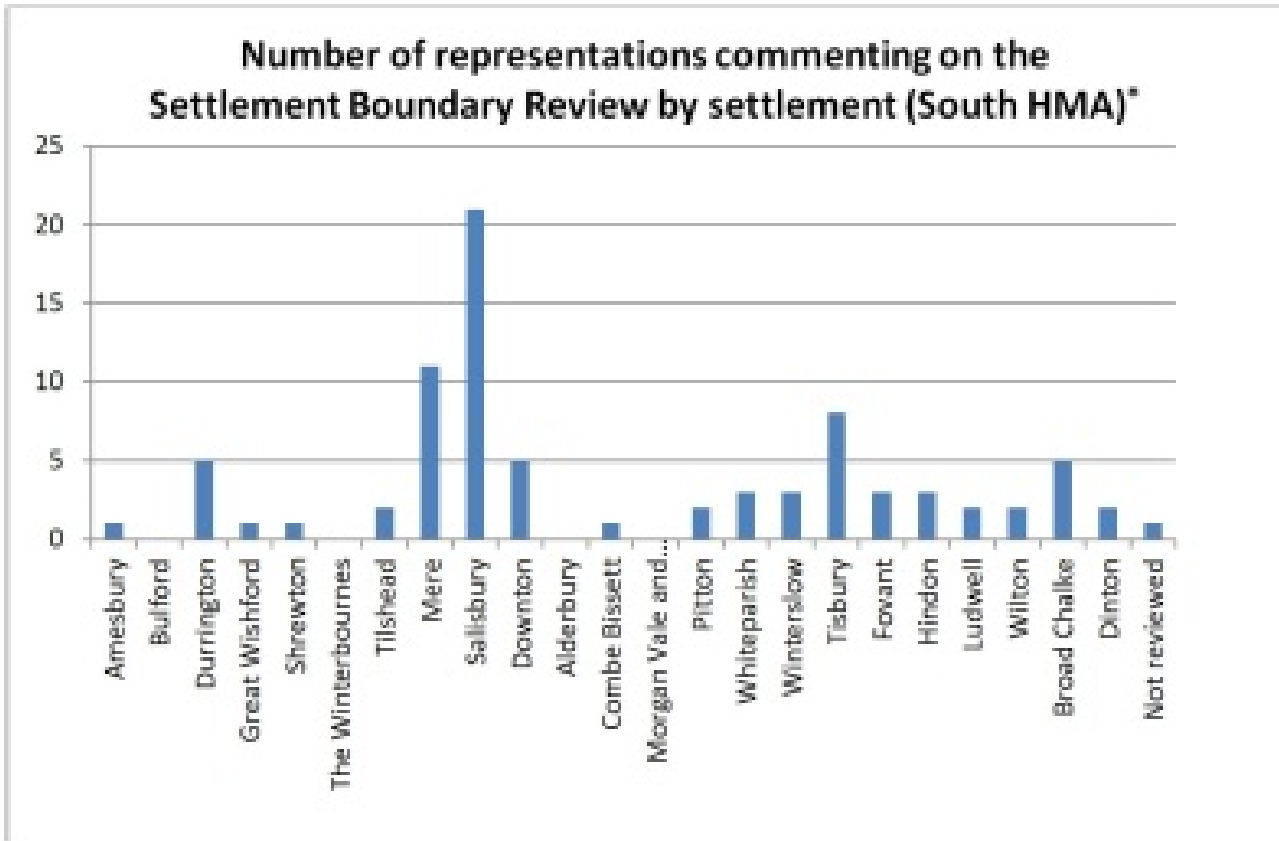
Picture 7.4 Graph showing comments to settlement boundary reviews in the North and West HMA.



\* The total number of representations by settlement is higher than for the HMA because one representation commented on more than one settlement.

**7.12** In the North and West Housing Market Area, there was an even spread of comments on the proposed amendments to the settlement boundaries across all community areas. Proposed amendments to the settlement boundaries for Warminster, Seend, Trowbridge and Westbury attracted a relatively higher number of comments, whereas no comments were received for seven of the 41 settlements whose boundaries were reviewed. However, the informal consultation undertaken between July and September 2014 provided town and parish councils with the opportunity to comment on draft proposals for amendments to settlement boundaries. These comments then informed the proposed amendments to the settlement boundaries in the draft Wiltshire Housing Site Allocations Plan.

Picture 7.5 Graph showing comments on the settlement boundary reviews in the South HMA.

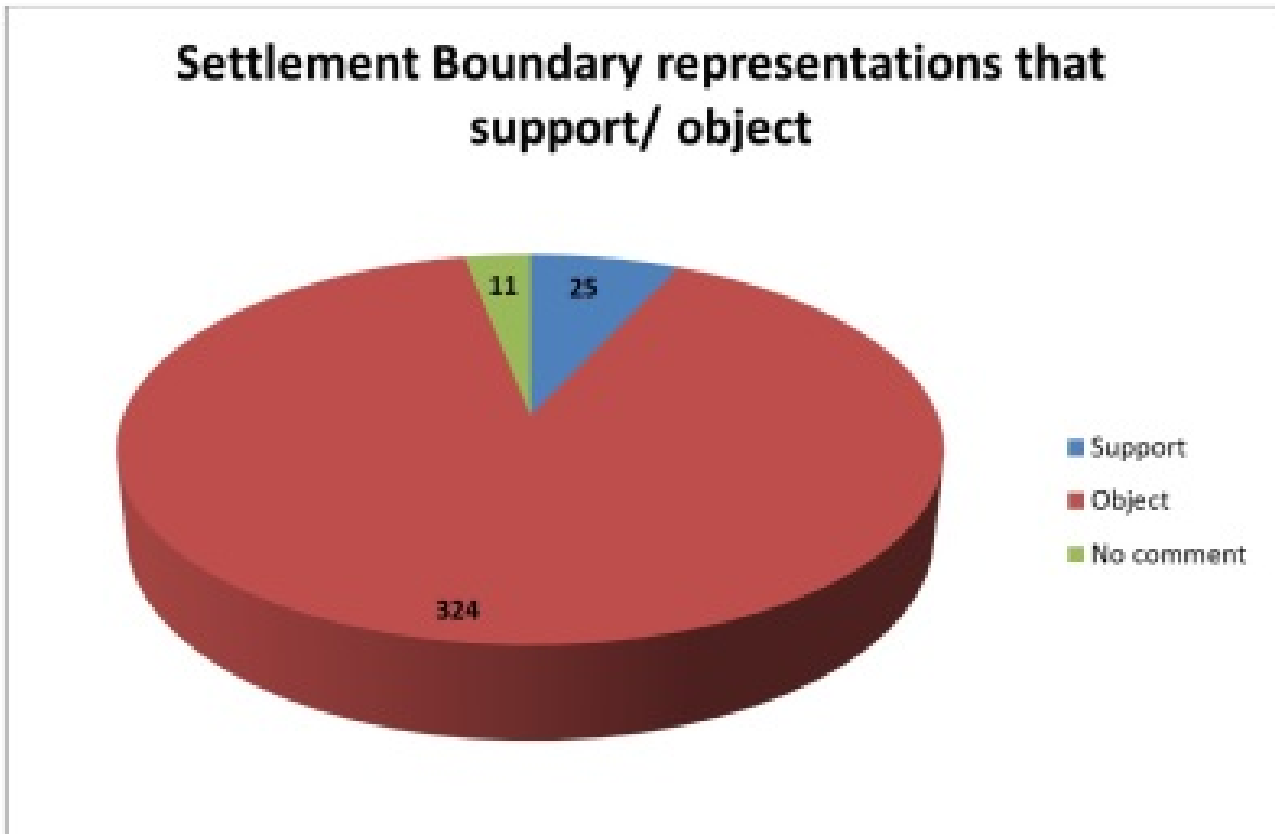


\* The total number of representations by settlement is higher than for the HMA because representations commented on more than one settlement.

**7.13** In the South Housing Market Area, there was an even spread of comments on the proposed amendments to the settlement boundaries across all community areas. Proposed amendments to the settlement boundaries for Salisbury, Mere and Tisbury attracted a relatively higher number of comments, whereas no comments were received for four of the 23 settlements whose boundaries were reviewed. However, the informal consultation undertaken between July and September 2014 provided town and parish councils with the opportunity to comment on draft proposals for amendments to settlement boundaries. These comments then informed the proposed amendments to the settlement boundaries in the draft Wiltshire Housing Site Allocations Plan.

**7.14** The pie chart below shows the number of comments supporting and objecting to the proposed amendments to the settlement boundaries.

Picture 7.6 Pie chart showing comments supporting or objecting to settlement boundary review changes.



**7.15** The remainder of this section will now outline the main issues made by prescribed bodies and neighbouring authorities before summarising the main issues raised by all representations.

**Prescribed Bodies and Neighbouring Authorities: summary of responses**

**7.16** As anticipated by the TCPR and the SCI, all prescribed bodies and neighbouring authorities have been consulted on the pre-submission proposals. A summary of the comments received from statutory bodies and neighbouring authorities is set out in Table 7.1 below:

Table 7.1 Summary of comments received from Prescribed Bodies and Neighbouring Authorities

<p><b>Historic England</b></p> <p><b>Summary of main issues raised:</b></p> <p>Historic England states that it will be important to clearly demonstrate within the Plan that the approach to development affecting designated and non-designated heritage assets is appropriately justified, that it is consistent with national policy, and likely to be effective in helping to deliver the requirements of the Wiltshire Core Strategy. In accordance with legislation and national policy, great weight must be applied to the conservation of the affected heritage assets. It may therefore be useful to produce a specific heritage topic paper/statement making the case for the spatial strategy and individual allocations from a heritage perspective.</p> <p>They suggest further evidence is required to inform site suitability and deliverability in accordance with national policy for the following proposed allocations:</p> <ul style="list-style-type: none"> <li>• H2.2 Land off the A363 at White Horse Business Park, Trowbridge</li> </ul>
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- H2.3 Elizabeth Way, Trowbridge
- H2.4 Church Lane, Trowbridge
- H2.6 Southwick Court, Trowbridge
- H2.7 East of the Dene, Warminster
- H3.3 North of Netherhampton Road, Salisbury

**Action taken by the Council in response:**

In consultation with Historic England, further evidence in the form of a high level Heritage Impact Assessment (HIA) was commissioned, to augment the Council's existing evidence base and, where necessary, help refine proposed allocations.

The Heritage Impact Assessment produced for the Council naturally reflects statutory <sup>(20)</sup> and national planning policy advice and takes a precautionary approach to the assessment of heritage assets and the degree to which their significance would be harmed by development proceeding. However, the assessment nonetheless concludes for all sites that the scale of harm would be less than substantial and for two site allocations (H2.3 Elizabeth Way, Trowbridge; H2.4 Church Lane, Trowbridge) there were low risks associated with development and can proceed as allocations. The report identifies more significant risks with proceeding with the H2.6 Southwick Court (Trowbridge), H2.2 Land off A363 at White Horse Business Park (Trowbridge), H2.7 East of Dene (Warminster) and H3.3 Land North of Netherhampton Road (Salisbury) site allocations that merit further consideration.

As defined by paragraph 134 of the National Planning Policy Framework, where a proposed development would lead to 'less than substantial harm' to the significance of a designated heritage asset (which can be of varying degrees of impact), should be weighed against the public benefits of development proceeding. This important consideration, together with an explanation of less than substantial harm, has been set out in more detail within a 'Heritage Note' (appended to the Cabinet/Council Committee Report) that will be submitted to the Secretary of State to inform the Examination process.

Having carefully considered the evidence from all sources and options for how to proceed, it is considered that there is no justification for recommending deletion of the proposed sites on heritage grounds. However, in the light of the HIA and comments by Historic England, a series of Proposed Changes have been prepared to reflect the evidence and comments submitted by Historic England. The Changes emphasise the special regard that needs to be applied to conserving heritage assets in a manner appropriate to their significance (including the contribution made by their settings).

**Environment Agency**

**Summary of main issues raised:**

In response to the consultation, Natural England and the Environment Agency raised concerns about the soundness of the draft Plan and the potential impact of proposed growth on the River Avon Special Area of Conservation (SAC), an internationally important wildlife site. They considered there to be insufficient evidence and certainty that development is unlikely to have an adverse effect on concentrations of phosphates within the River Avon SAC. In this regard, concerns were

20 Planning (Listed Buildings and Conservation Areas) Act 1990, Sections 66(1) and 72(1)

raised with the Habitats Regulations Assessment accompanying the draft Plan, which is published as a supporting paper to this report. This identified issues with the implementation of the Nutrient Management Plan (NMP) but concluded that with mitigation there are unlikely to be any adverse effects.

Phosphates in relation to the River Avon SAC is a complex and technical issue, as recognised by Core Policy 69 of the Wiltshire Core Strategy that relates to the Protection of the River Avon SAC and refers to the role of the Nutrient Management Plan (NMP) in managing phosphate levels. In simple terms, the reduction in phosphates anticipated through catchment sensitive farming practices has not been achieved. Since making their response to the draft Plan, Natural England and Environment Agency have confirmed that they will be reviewing some of the underlying assumptions in the NMP. As such, they have simplified their advice and require that development should be designed to be phosphate neutral.

The Environment Agency is otherwise satisfied with the Plan proposals, provided that built development only occurs within Flood Zone 1. For sites in Groundwater Source Protection Zone 1 the Environment Agency advises that there must be no discharges to ground other than clean, uncontaminated surface water. In addition, it was advised that the predicted effects of climate change must be taken into account by applying buffer zones to flood zones 2 and 3 and water courses within or in the vicinity of proposed sites.

The Environment Agency recommends that a requirement for drainage strategies is added to the policies relating to all proposed site allocations.

Natural flood management measures (e.g. 'leaky weirs', woodland planting etc), surface water attenuation features and Sustainable Drainage Systems (SuDs) should be incorporated into proposed development to manage surface water.

As a number of the proposed allocations are within groundwater Source Protection Zones, the Agency advises that the Council must ensure all proposed development activities are in line with the latest groundwater policy.

The Environment Agency has also provided individual comments on the site allocations.

#### **Action taken by the Council in response:**

In preparing the draft Plan, the Council undertook the sequential test and built development is only proposed to occur within flood zone 1. Flood risk from all sources will be addressed through site design and mitigation. In line with Core Policy 68 'Water Resources' of the Wiltshire Core Strategy, national policy and Environment Agency guidance, the Council will ensure, where appropriate to circumstance, that buffer strips are provided in the design and layout of schemes to account for the predicted effects of climate change in respect of the areal extent of flood zones 2 and 3.

Proposed changes to the draft Plan have been prepared to ensure buffer areas, and comprehensive drainage strategies (including Sustainable Drainage Systems (SuDS)) are delivered through subsequent planning applications.

Groundwater protection zones have been considered as part of the site selection process but a series of proposed changes to the draft Plan have been prepared to address the comments received from the Environment Agency.

Since the close of the consultation the Council has been working constructively with all relevant parties: Natural England, Wessex Water, the Environment Agency and neighbouring authorities (e.g. New Forest District Council) on the phosphates issue. Progress is being made on a 'Memorandum of Understanding' ('the MoU'), which has been drafted to set out the approach to



identifying effective and proportionate measures to remove or off-set the phosphate load from qualifying developments and how the Council and all parties will work together. This will give greater certainty with respect to nutrient management, sufficient for the Council to conclude that the draft Plan will support phosphate neutral development that is unlikely to have adverse effects upon the integrity of the SAC. Significant and constructive progress has been made towards finalising the MoU. This includes a commitment to preparing additional work to identify in more detail the measures that will be required to offset phosphate inputs, in Wiltshire to be paid for by the Community Infrastructure Levy. A proposed change is recommended to the draft Plan to reflect the requirements of the MoU and ensure development proceeds in a compliant way. This is reflected in the Addendum to the HRA.

Further work between all partners is ongoing to develop measures to address the phosphates issues in the geographical area covered by the Hampshire Avon Nutrient Management Plan. A memorandum of understanding is being developed to show all partners are in agreement that measures are being finalised that will ensure all new development is phosphate neutral.

## Natural England

### Summary of main issues raised:

Natural England objected to the draft Plan through the consultation in respect of the proposals at Trowbridge on the grounds that a mitigation strategy to protect the integrity of the Bath and Bradford on Avon Bats SAC was not in place. Again, work has been progressed in respect of this matter and constructive dialogue with Natural England has taken place. Natural England welcomed work to date on developing a mitigation strategy to ensure the qualifying features of the Bath and Bradford-on-Avon Bats SAC are appropriately protected from the pressures exerted by development through mitigation measures designed to safeguard protected bat species.

One of the issues at the heart of Natural England's objection relates to Core Policy 29 of the Core Strategy in terms of ensuring the impacts associated with further development at Trowbridge (loss of habitat and increased recreational pressure) are addressed. To this end, the Council commissioned work in July 2017 to investigate the nature of recreational pressure on large, publicly accessible open spaces including important bat habitats around the town. The findings led to a series of recommendations that are now being developed alongside measures for offsetting loss of habitat, to provide a coherent, strategic approach to safeguarding bats associated with the SAC.

Work is progressing on developing the Trowbridge Bat Mitigation Strategy in consultation with Natural England. It is anticipated that this will form part of the submission documents to support the draft Plan. It has been agreed that the Strategy will be delivered in two phases. Phase 1<sup>(21)</sup> will focus on development coming forward within the timescale of the draft Plan, including both allocated land and windfall sites, identifying the nature of mitigation required mostly within the allocations themselves. It will collate all available evidence on bat habitats at the town and provide recommendations to satisfy the Competent Authority (the Council), in consultation with Natural England, that the proposals in the draft Plan would not put at risk the integrity of the Bath and Bradford on Avon Bats SAC. To this extent, there are proposals already set out within the draft Plan for how development intends to bolster green infrastructure and create 'dark corridors' to provide greater permeability for bats in the urban/rural landscape.

21 Phase 2 will follow to provide a longer-term strategy to support the Local Plan Review, which plans for the period 2016 to 2036

The Addendum to the HRA considers that together with the proposals included in the draft Plan to protect and buffer existing bat habitat, Phase 1 of the Trowbridge Bat Mitigation Strategy will be sufficient to ensure that adverse impacts to the SAC features will be avoided and the integrity of the SAC maintained.

The second key issue raised relates to the management of phosphates and is discussed in more detail above under the section relating to engagement with the Environment Agency.

The approach to considering public rights of way and open space within the draft Plan is recognised as an issue that needs to be clear and equitably represented alongside other factors. Loss of recreation amenity must be properly considered and loss of green infrastructure resulting from the proposed development should be replaced by equivalent or better provision, without an approach to address any loss Natural England considers the Plan to be unsound.

**Action taken by the Council in response:**

A review of the evidence has been carried out to ensure public rights of way and open space were treated equitably in the site selection process and policy requirements. The Council has ensured it has acted equitably and in accordance with national planning policy in the site selection process and proposed modifications have been suggested to policy where appropriate. Core Policy 52 of the Wiltshire Core Strategy requires the creation of replacement green infrastructure if such land is lost through development.

Further work between all partners is ongoing to develop measures to address the phosphates issues in the geographical area covered by the Hampshire Avon Nutrient Management Plan. A memorandum of understanding is being developed to show all partners are in agreement that measures are being finalised that will ensure all new development is phosphate neutral. The action taken by the Council to address the phosphates issues is discussed in more detail above under the section relating to the Environment Agency.

Work is ongoing to deliver the Trowbridge Bat Mitigation Strategy. Phase I of this work will be submitted with the Plan to satisfy the immediate HRA compliance requirements. Phase II will be prepared alongside the emerging Local Plan (Core Strategy) Review process to inform longer-term plans for housing growth at the Trowbridge and potentially other locations too (e.g. Corsham).

**Network Rail**

**Summary of main issues raised:**

Network Rail comment that developer contributions would be required to fund necessary rail infrastructure improvements and this should be a consideration in viability testing. Specific comments are raised in relation to proposed allocation H1.1 at Ludgershall.

Network Rail requires that proposals for the site are supported by evidence to demonstrate that any increase of footfall across the existing pedestrian rail crossing would not compromise rail safety. It is recommended that the policy identifies either a need to close the crossing and divert the public right of way, or to improve the crossing - i.e. provision of a bridge.

**Action taken by the Council in response:**

The proposed amendment to the policy text for site allocation H1.1 would need to be discussed and agreed with the site promoter and Network Rail prior to the Examination hearings. At this stage, there is no evidence to justify a need to alter the existing rail crossing point.

<p><b>Highways England</b></p> <p><b>Summary of main issues raised:</b></p> <p>Highways England comments that the Plan needs to be supported by an assessment of infrastructure necessary to ensure that traffic impacts are not severe. Highways England would be content if the identified infrastructure satisfies requirements of Para 9 of Circular 02/2013<sup>(22)</sup></p> <p>Assessment of infrastructure requirements for the Strategic Road Network is currently ongoing, led by Wiltshire Council in consultation with Highways England. It is envisaged that infrastructure requirements will have been assessed by the time of examination and Highways England will be willing to assist the Inspector to report on any residual implications for the Strategic Road Network. The Highways Agency raise issues related to geographical areas, rather than specific sites as follows:</p> <ul style="list-style-type: none"> <li>● Salisbury Sites – impact on A36.</li> <li>● Chippenham sites - impact on M4 junction 17.</li> </ul> <p>Highways England state that in Salisbury, Policy H3.1 requires ‘transport network improvements’ to be made and that the same should be the case for site allocation H3.3.</p> <p><b>Action taken by the Council in response:</b></p> <p>There is ongoing joint working with Highways England to understand and address these issues. Modelling work is being carried out for Trowbridge and Salisbury to provide a package of mitigation measures to support the proposed allocations in these settlements. Highways England is also reviewed reviewing their own TEMPRO modelling work. It is considered unlikely that the proposals would lead to severe impacts on Junction 17 of the M4 and it has been agreed with Highways England that the response was looking for justification of why further assessment has not been carried out, in this case it is due to the small scale of the proposed allocations in the Chippenham Community Area. An agreed position will be presented through the Examination process as a Statement of Common Ground. Appropriate proposed changes have been suggested for site allocation H3.3.</p> <p><b>New Forest District Council</b></p> <p><b>Summary of main issues raised:</b></p> <p>New Forest District Council welcomes reference in the duty to cooperate statement to the implications of housing requirements for the parts of the wider South Wiltshire Housing Market Area that are within the New Forest National Park. There is housing need in the New Forest District area that New Forest District Council cannot accommodate. Wiltshire Council should take account of unmet housing need in these areas.</p> <p>In terms of recreation impacts on the New Forest European sites, the Council recognises that the draft Plan does not propose to allocate sites in proximity to the New Forest SPA/SAC (outside the visitor catchment area) and that the Habitat Regulations Assessment concludes no likely significant effects; but identifies that consideration should be given to impacts from neighbourhood plans. .</p>
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22 <https://www.gov.uk/government/publications/strategic-road-network-and-the-delivery-of-sustainable-development>

The Core Strategy Habitats Regulations Assessment did not identify adverse effects from development on the integrity of any European sites (including the New Forest SAC) from nitrogen deposition. This conclusion remains as little or no further growth has occurred in the visitor catchment area. However, following a High Court Judgement relating to the need to assess in combination air quality impacts, the Wiltshire Habitats Regulations Assessment may need to be reconsidered.

There are potential in-combination effects related to phosphate issues that need to be addressed on a catchment-wide basis, in the catchment area of the River Avon.

**Action taken by the Council:**

Work will be carried out through duty to cooperate to identify and address the specific issues raised. Where appropriate, mitigation measures will be incorporated into policy to ensure the integrity of the Natura 2000 network is not adversely affected by housing development although this may be through the Local Plan review process where appropriate.

Further work between all partners is ongoing to develop measure to address the phosphates issues in the geographical area covered by the Hampshire Avon Nutrient Management Plan. A memorandum of understanding is being developed to show all partners are in agreement that measures are being finalised that will ensure all new development is phosphate neutral.

Consideration of cross boundary strategic issues in relation to addressing unmet housing need will fall within the ambit of the Wiltshire Local Plan Review.

Funding has now been secured through a partnership bid to the Planning Delivery Fund (Joint Working) to develop evidence to understand the impact of recreational pressure on the New Forest arising from new development as basis for developing an appropriate framework for mitigation. This will inform the Wiltshire Local Plan Review. In the interim, in assessing the effects of neighbourhood plan proposals on the New Forest SPA, in line with paragraph 6.77 of the Wiltshire Core Strategy, "*planning applications will be subject to individual HRAs and bespoke mitigation secured as necessary.*"

**New Forest National Park**

**Summary of main issues raised:**

The New Forest National Park Authority recognises that none of the housing site allocations in this current consultation fall within the visitor catchment of the New Forest SPA and the requirements of the adopted Core Strategy (paragraph 6.77) to mitigate the impact of the plan in relation to the New Forest SPA and increased recreational pressure may not apply. The Authority would like to emphasise that Wiltshire Council isn't currently meeting its requirements in relation to other housing allocations identified within the adopted Core Strategy. As such, the impacts on the New Forest SPA are not currently being mitigated – an issue that was identified in the HRA of the Council's adopted Core Strategy some years ago.

Mitigation strategies have been in place for planning permissions granted by the National Park Authority and New Forest District Council since 2012 and 2015 respectively and could provide a useful starting point to any discussions on the production of a mitigation strategy in line with Wiltshire Council's obligations under the habitats regulations.

**Action taken by the Council:**

Further work is being carried out through the HRA process.

<b>Bath and North East Somerset District Council</b>
Bath and North East Somerset have no comments to make on the Plan.
<b>Gloucestershire County Council</b>
Gloucestershire County Council acknowledges sites in Oaksey and Crudwell are near the Gloucestershire boarder and they agree with the SA and HRA finding.
<b>Hampshire County Council</b>
Hampshire County Council draws attention to the importance of safeguarding two minerals and waste sites (Brickworth Quarry and Pound Bottom Landfill) on the Wiltshire/Hampshire border.
<b>North Dorset District Council</b>
North Dorset District Council has no objection to the draft Plan as there are no strategic impacts on North Dorset District. The expansion of Shaftesbury into Wiltshire is identified as a strategic issue in the duty to cooperate statement. However, this is an option to pursue through the review of the Wiltshire Core Strategy rather than this plan.
<b>Test Valley Borough Council</b>
Test Valley Borough Council support the Plan and would like to continue working cross boundary on housing, transport and infrastructure issues that may arise from future development.  In regard to proposed allocation H1.1 land at Empress Way, Ludgershall Test Valley Borough Council welcome the requirement for screening to the southern and eastern boundaries of the site which will protect middle and long distance views from Test Valley.

## Main Issues

- 7.17** As anticipated by the TCPR, the following section distils and summarises the main issues arising from the pre-submission consultation. These are numbered and cover both thematic and geographical issues.

### Main Issue 1: The proposed level and distribution of housing within the Plan

- 7.18** A number of responses refer to the level and distribution of housing proposed within the draft Plan. In general, the responses call for the allocation of more sites and increased flexibility in terms of where sites are allocated across the county. This includes the following inter-linked sub-issues:

## Conformity with the Wiltshire Core Strategy and national policy:

- The Objectively Assessed Need (OAN) of the County (as set out in the WCS <sup>(23)</sup> ) is not being met in accordance with paragraphs 14 and 47 of the NPPF. The Plan does not take into account the new Strategic Housing Market Area evidence.
- The Plan should cover a longer time frame (that is at least 10 years) in line with the advice set out in the NPPF.
- The Plan should provide a list of reserve sites.
- The housing requirements set out in the Wiltshire Core Strategy should not be seen as a minimum, neither should they be seen as a ceiling for development through the plan period. Potential under delivery on allocated sites in the Wiltshire Core Strategy and made neighbourhood plans should be addressed in the Housing Site Allocations Plan through the identification of more sites.
- The plan should also consider allocating sites for employment development.

## Flexibility or rigidity of the Plan

- The methodology employed for allocating sites across the Housing Market Areas is unduly rigid and a more flexible approach should be taken to meeting indicative housing needs across the county.
- Housing sites should be identified at sustainable locations in more areas, not just the identified 'areas of search'. The Plan should not exclude sustainable sites and land within areas of search where the indicative housing need has already been met.
- Suitable sites should be considered in any locations that are in line with the Wiltshire Core Strategy's spatial strategy and that the Plan should also consider sites outside of the Strategic Housing Land Availability Assessment (SHLAA)/ Strategic Housing and Economic Land Availability Assessment (SHELAA).
- Where areas are constrained consideration should be given to providing the housing requirement elsewhere in the wider HMA, for example, meeting some of the housing requirement for Trowbridge in the surrounding large villages.

## Approach to identifying housing sites at Large Villages

- On one hand comments were made that the Plan is not addressing affordability issues facing rural communities and that more new homes in villages may help support local services and meet affordable need. More housing needs to be delivered in rural villages to meet demand. But on the other hand comments were made that too many homes are being identified at large villages and that these are not 'modest development' and beyond the 10 dwellings referred to in the Core Strategy. <sup>(24)</sup>

23 The evidence to support the Wiltshire Core Strategy set the OAN as 44,000 homes to be delivered from 2006-2026. However, the overall requirement to be delivered by the Core Strategy is 42,000 homes.

24 Paragraph 4.15 of the Wiltshire Core Strategy: <http://www.wiltshire.gov.uk/adopted-local-plan-jan16-low-res.pdf>.

- Comments were also made that a consistent approach is not being taken to Large Villages across the county, with allocations made at Large Villages in some community areas, and not others. This also applied to the Local Service Centres with allocations made at Market Lavington but not at Cricklade.
- Comments were made that whole villages should not be ruled out of assessment.

### **The relationship with neighbourhood plans**

- The relationship between the Plan and neighbourhood plans needs further clarification. The reliance on sites in neighbourhood plans creates uncertainty as the sites identified are not rigorously tested. Sites in areas with a made neighbourhood plan allocating sites should not be removed from the site selection process. For example, calls are made for allocating sites in Pewsey, Devizes and Malmesbury despite there being made neighbourhood plans in place.

### **Housing land supply**

- Technical comments were made on how windfall is calculated.
- Technical comments were made on how housing land supply is calculated.
- More emphasis should be applied in the Plan to other sources of housing supply such as brownfield development within settlement boundaries and bringing long term empty homes back into use.

**7.19** Within this main issue there were some comments presented on an area basis as follows:

- Sites should be allocated in South Wiltshire to meet unmet housing need in the New Forest National Park.
- Sites should be allocated to meet unmet need in Swindon.
- Sites should be allocated in Chippenham.
- Land adjoining Shaftesbury in North Dorset should be considered for allocation.
- In each HMA there were responses that called for more development in some areas and less development in others and which questioned the way that housing requirements were rigidly applied to community areas and settlement.

### **The Council's response:**

**7.20** The adopted Wiltshire Core Strategy sets out the housing requirement for Wiltshire until 2026 and the distribution of this housing requirement by Community Area, principal settlement, market town and some local service centres. The Plan has been prepared in general conformity with the Wiltshire Core Strategy and delivers housing allocations in areas where the Core Strategy requirement is yet to be met. Within this Plan there is no need to look beyond these identified areas of search. The Local Plan Review has begun and will review the Wiltshire Core Strategy on the basis of revised housing evidence.

**7.21** The SHLAA/SHELAA provided a stock of developable sites and, in the main, it has not been necessary to look beyond these unless a clearly suitable site was identified through the Regulation 19 consultation process (e.g. 'Omission Sites'). With regard to 'Brownfield' land, the Council considers that where such sites occur within settlement boundaries, they can already come forward in accordance with national planning policy (the general presumption in favour of sustainable development) and Core Policy 2 of the Wiltshire Core Strategy. As such, there is no need to formally allocate such sites.

**7.22** The Council fully supports the delivery of housing through neighbourhood plans and has reflected this through the methodology that underpins the Plan. Prior to being 'made', neighbourhood plans are independently examined and hence proposals for development are scrutinised in line the basic conditions tests. Therefore, it is considered reasonable to assume that housing sites identified within made neighbourhood plans provide a credible source of housing land supply.

**7.23** The indicative remaining housing requirement has not been calculated to include a windfall allowance as it is not a committed source of supply. However, given the Council's understanding of historic delivery on windfall sites, the actual delivery against the indicative requirements for the Community Areas are likely to be greater than estimated.<sup>(25)</sup>

## **Main Issue 2: The methodology for identifying sites and the sustainability assessment**

**7.24** Linked to main issue 1 above, comments were also made on the site selection methodology and evidence base as follows:

- Sites allocated for non-residential uses such as Principal Employment Areas should not be excluded from the process.
- The Sustainability Appraisal (SA) should assess the following alternative approaches:
  - An alternative to the 'Local Service Centre' only strategy in East Wiltshire.
  - It should consider sites in areas where there is no indicative housing requirement or where there is a made neighbourhood plan allocating sites.
  - The SA should test the consequence of not allocating homes in rural areas.
  - Identifying sites for Trowbridge town in the wider community area.
- Specific comments about the SA criteria and individual application of the SA criteria to individual sites can be found in **Part 32 of Appendix M**.

### **The Council's response:**

**7.25** Principal Employment Areas are protected in the Wiltshire Core Strategy and any reassessment of such sites would take place through the Local Plan Review. The draft Plan has been prepared to support the Wiltshire Core Strategy and is in general conformity with it. Approaches that move away from the Core Strategy core policies will be tested through the Local Plan Review if necessary. For further information on the sustainability appraisal refer to the main SA Report (Atkins) that accompanies the Plan.

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25 Topic Paper 3 Housing Land Supply  
<http://www.wiltshire.gov.uk/planning/policy/document?directory=Wiltshire%20Housing%20Site%20Allocations%20DPD/Pre-Submission%20Consultation%20July%202017&ref=7>



### Main Issue 3: The methodology for reviewing settlement boundaries

**7.26** Many responses highlighted individual areas at settlements that should be included within or excluded from the settlement boundary to be consistent with the methodology. Some responses have challenged the methodology and, in general, have argued that the settlement boundaries are too tightly drawn. Specific issues include responses that have argued the settlement boundary review has

- Excluded undeveloped land suitable for development.
- Excluded built/ commenced development that is well-related to the settlement.
- Excluded the curtilage of properties, in part or in full, for example large gardens.
- Pre-empted reviews of settlement boundaries by neighbourhood plans.
- Included built/ commenced development that is isolated from the settlement.
- Excluded site allocations and extant planning permissions that have not commenced.
- Not been subject to an adequate consultation process.

**7.27** Further detailed analysis of representations related to the settlement boundary review can be found in **Appendix P**.

#### The Council's response

**7.28** The Wiltshire Core Strategy requires the Wiltshire Housing Site Allocations Plan (WHSAP) and the Chippenham Site Allocations Plan (CSAP) to review settlement boundaries. Settlement boundaries can also be reviewed through the neighbourhood planning process. Indeed, a number of settlement boundaries have been reviewed that way. The Plan shows revised settlement boundaries in line with the revised methodology published in the accompanying **Topic Paper 1 Settlement Boundary Review Methodology**. The revised methodology had been informed by an informal consultation with town and parish councils. Topic Paper 1 clarifies that settlement boundaries are a policy tool for ensuring the right type of development in the right place and their general purpose is to define the built form of the settlement and not to allocate sites for development. The Council has reviewed all consultation responses and proposes changes where it considers that the revised settlement boundary is not consistent with the methodology.

### Main Issue 4: 'Omission Sites'

**7.29** Several responses proposed alternative land for allocation in the draft Plan. These sites have been grouped together and defined as 'omission sites' and take one of three forms:

- Sites have been put forward that have not previously been assessed through the site selection process, but which are within areas of search where the Council is seeking to deliver housing. 25 of these new sites have been submitted to the Council as follows:
  - Land at Hullavington Airfield (site OM011)
  - Land at Tuners Lane, Crudwell (site OM014)
  - Land west of Greenlands, Heytesbury (site OM004)

- Land adjacent to site 611, Codford (site OM012)
  - Land at Brick Hill, Bath Road, Warminster (site OM005)
  - Land to the south of Boreham Road, Bishopstrow (site OM006)
  - Land at Pear Tree Orchard, Bratton (OM007)
  - Asda, London Road, Salisbury (site OM001)
  - Site north of the A3094, Salisbury (OM002)
  - Land at lower Bemerton Road, Salisbury (site OM008)
  - Land adjacent Britford Park and Ride, Salisbury (site OM009)
  - The Yard, Hampton Park, Salisbury (site OM003)
  - Land east of Yatton Keynell off the B4039 (site OM015)
  - Land off Elstone Lane, Shrewton (site OM010)
  - Land off Mill Lane, Stratford Sub castle, Salisbury (site OM013)
  - Minton Distribution Park, Amesbury (site OM016)
  - Land to the rear of Newton, Hullavington (site OM017)
  - Land to the south of Lye Common, Christian Malford (site OM018)
  - Land at High Street, Sutton Benger (site OM019)
  - Former Bowyers site, Trowbridge (site OM020)
  - East Wing site, Trowbridge (site OM021)
  - Trowbridge Hospital site (site OM022)
  - Margaret Stancombe School, Trowbridge (site OM023)
  - Virgin site, Trowbridge (site OM024)
  - Ashton Street Centre, Trowbridge (site OM025).
- A number of sites have been put forward which have already been assessed in areas of search where housing allocations are being sought. Further evidence has been provided to support some of these sites and thereby challenge the Council's assessment; and
  - A number of sites have been put forward in areas of search where we are not currently seeking sites for housing.

## The Council's response:

- 7.30** The Plan has been prepared to be in general conformity with the Wiltshire Core Strategy and delivers housing allocations in areas where the Core Strategy's indicative housing requirement is yet to be met, or where there is a risk of under-delivery. For the 25 new sites in areas of search where the Council is seeking housing allocations further assessment work has been carried out through the application of the Council's site selection methodology. Where sites have been put forward in areas where we are not seeking housing allocations, no further work will be carried out as the indicative requirements anticipated by the Core Strategy have either been met/exceeded, or will be met/exceeded through commitments or neighbourhood plan allocations. Where further evidence has been put forward for sites that have already been assessed and rejected through the site selection process, further work has been carried out to assess whether the new evidence would alter the original decision.
- 7.31** A full list of omission sites and outcomes can be found at **Appendix N** along with maps showing the omission sites by settlement at **Appendix O**.

## Thematic and Technical Matters

### Main Issue 5: Heritage Evidence

- 7.32** Historic England has stated that it must be ensured that great weight is given to heritage assets in Wiltshire. Responses from consultees have also highlighted heritage sensitivities for some of the proposed allocations.

## The Council's response

- 7.33** To address this issue, a high-level Heritage Impact Assessment (HIA) has been prepared that focuses on six proposed allocations where specific heritage sensitivities have been identified. Whilst high-level, the HIA augments the evidence base the Council relied upon for the purposes of identifying/assessing heritage issues. These sites are:
- H2.2 Land off the A363 at White Horse Business Park, Trowbridge
  - H2.3 Elizabeth Way, Trowbridge
  - H2.4 Church Lane, Trowbridge
  - H2.6 Southwick Court, Trowbridge
  - H2.7 East of the Dene, Warminster
  - H3.3 North of Netherhampton Road, Salisbury.

- 7.34** Where necessary, amendments to the draft Plan have been proposed to address the concerns raised by Historic England and the detailed findings set out within the high-level HIA.

### Main Issue 6: Habitat Regulations Assessment (HRA) - Trowbridge Bat Mitigation Strategy

- 7.35** Natural England has stated that this strategy must include consideration of both habitat degradation and recreation pressure. In addition, the Strategy will need to be in place prior to the Examination of the Plan in order for them to consider the Plan to be sound on the issue of impact on the Bath and Bradford Special Area of Conservation (SAC).

- 7.36** Numerous responses from other consultees have also referred to bats roosting and living near to the proposed Trowbridge site allocations. Reference has been made to the land that is the subject of the proposed allocations providing important habitat for protected bat species and the need to ensure they are protected.

#### **The Council's response**

- 7.37** The Council has responded positively to the advice provided by Natural England by developing the Trowbridge Bat Mitigation Strategy in two distinct phases. Phase I will address HRA concerns expressed by Natural England. Phase I of the Strategy will provide guidance for developers of the proposed allocations on measures to manage recreation pressure through the creation of open space; and mitigation in the form of on-site/off-site habitat creation. Phase II of the Strategy will be delivered alongside the review of the Wiltshire Core Strategy and hence provide a longer-term approach to addressing housing growth over the period up to 2036.

#### **Main Issue 7: Habitat Regulations Assessment - Phosphates Issues**

- 7.38** The Environment Agency and Natural England have commented that it is essential that consensus is reached on the approach to addressing phosphates issues in the area and that there is increased certainty on how these issues can be addressed. Further detail can be found in table 7.1 of this report and in the Addendum to the Duty to Cooperate Statement.

#### **The Council's response**

- 7.39** In line with the agreements reached to support the HRA of the Wiltshire Core Strategy, the Council has maintained a process of joint working with the Environment Agency, Natural England, Wessex Water, New Forest District Council, New Forest National Park and East Dorset District Council to reach consensus on solutions to identified phosphates issues over the short, medium and long-term. For the purposes of addressing the HRA for the Plan, an agreement will be in place in respect of phosphate management.

#### **Geographical Matters**

#### **Main Issue 8: The distribution of housing in the East Wiltshire Housing Market Area and site specific issues**

- 7.40** In the East Wiltshire Housing Market Area (HMA) consultation responses suggest the methodology and choice of locations for allocating sites is inconsistent. More emphasis should be applied to allocating housing sites in Large Villages in much the same way as is the case with the North and West Wiltshire HMA where allocations are made in the rural areas. It is suggested more sites should be allocated in the East Wiltshire HMA to meet local need in those areas. There are also comments that the Plan should make provision for anticipated under delivery on allocated sites within both the 'made' Devizes and Pewsey Neighbourhood Development Plans. This would mean that the Plan provides additional allocations in these locations.

#### **The Council's response:**

- 7.41** The Wiltshire Core Strategy sets out the indicative housing requirement and distribution for Wiltshire over the period 2006 to 2026. The Strategy is based upon housing delivery within Wiltshire's 20 Community Areas and then broken down to provide an indicative housing requirement to be delivered at: Principal Settlements, Market Towns and Local Service Centres. The Plan is in general conformity with the Wiltshire Core Strategy and delivers housing allocations in areas where the indicative Core Strategy requirements are yet to be

met. The housing land supply evidence suggests that there is no need to look beyond the identified areas of search. Neither is there any evidence at this stage to consider allocating additional strategic sites in areas with a 'made' neighbourhood development plan in place. Allocated sites in made neighbourhood plans in Pewsey and Devizes form part of the housing land supply. The Local Plan Review process has begun and this will lead to a full review the Wiltshire Core Strategy on the basis of revised housing evidence and will address any wider issues related to the revised housing projections over the period up to 2036.

### **Site specific issues for allocations in the East Wiltshire Housing Market Area**

- 7.42** The responses suggest the proposed site allocations in Market Lavington should be reviewed, or dropped. The reasoning for this suggestion is predicated on the fact that progress has been made with the Neighbourhood Plan and new heritage evidence submitted in respect of the proposed omission site - Land at the Spring.
- 7.43** Site specific issues for allocations in the East Wiltshire Housing Market Area can be found in **Appendix M** as follows:
- 7.44** **Part 3:** Housing allocation H1.1: Empress Way, Ludgershall  
**Part 4:** Housing allocation H1.2: Underhill Nursery, Market Lavington  
**Part 5:** Housing allocation H1.3 Southcliffe, Market Lavington  
**Part 6:** Housing allocation H1.4: East of Lavington School, Market Lavington

### **The Council's response:**

- 7.45** The Council acknowledges and supports the neighbourhood planning process taking place in Market Lavington. However, as with all neighbourhood planning taking place across the County, the Site Selection Methodology for the Plan has been consistently applied. The emerging neighbourhood plan for Market Lavington is yet to reach the formal consultation stage <sup>(26)</sup> stage. Therefore, a decision was made to proceed with the identification, assessment and proposed allocation of sites at the settlement in order to progress the Devizes Community Area Strategy set out in the Wiltshire Core Strategy.
- 7.46** In response to the Regulation 19 consultation, further assessment work has been undertaken on the proposed allocations and an Omission Site (Land at The Spring). Details in respect of these matters can be found in the update to Devizes Community Area Topic Paper.

### **Main Issue 9: The distribution of housing in the North and West Housing Wiltshire Housing Market Area and site specific issues**

- 7.47** In the North and West Housing Market Area (HMA) the consultation responses suggested that there is too much focus on Trowbridge and that housing land/sites should be allocated at other Market Towns/Large Villages in the HMA. In addition, consultation responses called for more emphasis to be applied to the regeneration of brownfield sites, particularly in Trowbridge.

### **The Council's response**

- 7.48** The Wiltshire Core Strategy sets out the indicative housing requirement and distribution for Wiltshire over the period – 2006 to 2026. The Strategy is based upon housing delivery within Wiltshire's 20 Community Areas and then broken down to provide an indicative housing requirement to be delivered at: Principal Settlements, Market Towns and Local Service Centres. The Plan has been prepared to be in general conformity with the Wiltshire Core Strategy and delivers housing allocations in areas where the indicative Core Strategy

requirements are yet to be met. The evidence suggests that there is no need to look beyond the identified areas of search. The Local Plan Review process has begun and this will lead to a full review the Wiltshire Core Strategy on the basis of revised housing evidence.

**7.49** It is anticipated that the delivery of housing on brownfield and greenfield sites will occur simultaneously to help address the projected number of homes needed for Trowbridge town set out within the Core Strategy (Core Policies 28 and 29).

**7.50** The potential risks associated with development at the town leading to coalescence with the outlying villages of Hilperton, Southwick and North Bradley is recognised as a local issue in the Wiltshire Core Strategy (see paragraph 5.150) and has been taken into account through the preparation of this Plan during site assessments under the landscape objective of the sustainability appraisal.

## **Site specific issues for allocations in the North and West Wiltshire Housing Market Area**

### **Trowbridge**

**7.51** In Trowbridge responses called for alternative approaches to delivering the indicative housing quantum for the Community Area as a whole. To meet the housing need in Trowbridge it was suggested allocations could be made at Large Villages within the wider Trowbridge Community Area or the wider North and West Housing Market Area in other Market Towns such as Calne or Melksham.

**7.52** As outlined above, a number of responses also called for greater priority to be given to deliver housing on brownfield land within Trowbridge town. The regeneration of these sites should be prioritised and set out within policy.

**7.53** Responses unequivocally stated that coalescence should not be allowed to occur between Trowbridge and its surrounding villages of Hilperton, North Bradley and Southwick.

**7.54** In Trowbridge a number of site specific, technical issues have been raised relating in particular to: concerns regarding the risk of harm to listed and non-listed heritage assets and their settings; drainage patterns; flood risk (linked to clay soils); ecology and biodiversity.

### **Bratton**

**7.55** A number of responses were received from the public that opposed development at the Large Village of Bratton and the parish council suggested an alternative site within the current settlement boundary.

### **Warminster**

**7.56** A number of objections related to proposed allocations at Warminster, in particular to site allocation H2.7 East of The Dene. Issues of concern relating to H2.7 include whether a sufficient need can be justified; the scale and location of development; concerns about impacts on heritage assets, biodiversity, flooding, local infrastructure capacity and highways capacity; and lack of employment opportunities.

### **Crudwell**

**7.57** A number of responses were received from the public that opposed the proposed site allocation H2.13 at the Large Village of Crudwell. These issues related to a range of issues, including whether a sufficient need can be justified; the scale of the allocation; concerns

about surface water drainage capacity and flooding impacts; potential impacts on heritage assets, landscape, highways capacity and local infrastructure; and whether the process of allocating sites should be left for a forthcoming neighbourhood plan.

### Yatton Keynell

- 7.58** A number of responses were received in opposition to the proposed site allocation H2.12 at the Large Village of Yatton Keynell. The issues of concern related to a range of issues, including whether there is sufficient justification for development at Yatton Keynell; the scale of the allocation proposed; potential impacts on biodiversity, landscape, highways capacity and local infrastructure; and whether the process of allocating sites should be left for a neighbourhood plan.

### Hullavington

- 7.59** The vast majority of the objections revolved around the scale of the proposed development with the majority of those who responded supporting the proposed allocation of 50 units as opposed to the developer who submitted a representation calling for the site to be extended to incorporate 70 units.
- 7.60** Other representations received related to the risks associated with development pressure being exerted on Junction 17 of the M4; and general concerns with regards to access to the site and sewage capacity.

### Chapmanslade

- 7.61** A number of objections were received in relation to the proposed site allocation H2.10 at Chapmanslade. The issues raised were in relation to the scale of proposed development; drainage capacity and the provision of affordable housing.
- 7.62** Site-specific issues relating to the allocations in the North and West Wiltshire Housing Market Area can be found in **Appendix M** as follows:
- 7.63**
- Part 8:** Housing allocation H2.1: Elm Grove Farm, Trowbridge
  - Part 9:** Housing allocation H2.2: Land off the A363 at White Horse Business Park, Trowbridge
  - Part 10:** Housing allocation H2.3: Elizabeth Way, Trowbridge
  - Part 11:** Housing allocation H2.4: Church Lane, Trowbridge
  - Part 12:** Housing allocation H2.5: Upper Studley, Trowbridge
  - Part 13:** Housing allocation H2.6: Southwick Court, Trowbridge
  - Part 14:** Housing allocation H2.7: East of the Dene, Warminster
  - Part 15:** Housing allocation H2.8: Bore Hill Farm, Warminster
  - Part 16:** Housing allocation H2.9: Boreham Road, Warminster
  - Part 17:** Housing allocation H2.10: Barters Farm, Chapmanslade
  - Part 18:** Housing allocation H2.11: The Street, Hullavington
  - Part 19:** Housing allocation H2.12: East of Farrells Field, Yatton Keynell
  - Part 20:** Housing allocation H2.13: Ridgeway Farm, Crudwell
  - Part 21:** Housing allocation H2.14: Court Orchard/ Cassways, Bratton.

### The Council response:

- 7.64** Where necessary, further assessment work has been undertaken to positively respond to representations received through the Regulation 19 consultation. Details of this work can be found in the updates to the relevant Community Area Topic Papers.

## **Main Issue 10: The distribution of housing in the South Wiltshire Housing Market Area and site specific issues**

- 7.65** The majority of consultation responses focussed on the proposed allocations at Salisbury. However, a good proportion of representations also called for sites to be considered at Large and Small Villages within the South Wiltshire (HMA).

### **The Council's response:**

- 7.66** The Wiltshire Core Strategy sets out the housing requirement for Wiltshire until 2026 and distribution of this housing requirement by community area, principal settlement, market town and local service centre. The Plan is in general conformity with the Wiltshire Core Strategy and delivers housing allocations in areas where the Core Strategy requirement is yet to be met. Within this Plan there is no need to look beyond these identified areas of search. The Local Plan Review has begun and will review the Wiltshire Core Strategy, this is based on a an emerging joint framework with Swindon and new housing market evidence and will address any wider issues related to the requirement and ongoing local plan policy.

### **Salisbury**

- 7.67** Comments submitted suggest that it is essential to ensure suitable infrastructure is in place to accommodate further growth in Salisbury, particularly transport infrastructure, on a city-wide and site-specific basis.
- 7.68** Some responses referred to the delayed delivery of the Wiltshire Core Strategy allocated sites at Churchfields and the Central Car Park and consequently suggested that housing numbers should increase for the City to address the under-delivery.

### **The Council's response**

- 7.69** The Salisbury Transport Strategy Refresh has assessed the highway network and modelled the effect of adding projected trip movements that would arise as a function of developing the proposed allocations within the Plan. The modelling work was premised on the fact that the level of housing allocations in Salisbury/Wilton effectively balances the lack of delivery on other strategic sites in Salisbury within the Plan period.
- 7.70** As part of the Council's commitment to meeting its obligations under the duty to cooperate, work is ongoing with the Highways England to address impacts on the A36(T).

### **Amesbury, Bulford and Durrington**

- 7.71** Comments object to further development at Durrington on grounds that it is not suitable for further development and that the cumulative impacts of the Army Basing Programme should be fully considered before any allocations are made. The approach to focus the housing requirement for Amesbury, Bulford and Durrington in Durrington has been questioned. Sites have been put forward as omission sites in Amesbury.

### **The Council's response**

- 7.72** The 'more sustainable' sites identified by the site assessment methodology in this area of search were at Durrington. However, due to the role of Amesbury as a Market Town within this Community Area, a site at Amesbury that was assessed as 'less sustainable' was considered for allocation and subsequently rejected due to the impact of noise from the A303 and the available evidence at the time that indicated the land was likely to be included in the plans to widen the A303.



## Site specific issues for allocations in the South Wiltshire Housing Market Area

- 7.73** For the proposed site allocations in Salisbury comments have been particularly made on transport and infrastructure provision, drainage issues and impact on view of Salisbury Cathedral Spire.
- 7.74** Site specific issues for site allocations in the South Wiltshire Housing Market Area can be found in **Appendix M** as follows:
- 7.75** **Part 23:** Housing allocation H3.1: Netherhampton Road, Salisbury  
**Part 24:** Housing allocation H3.2: Hilltop Way, Salisbury  
**Part 25:** Housing allocation H3.3: North of Netherhampton Road, Salisbury  
**Part 26:** Housing allocation H3.4: Land at Rowbarrow, Salisbury  
**Part 27:** Housing allocation H3.5: Clover Lane, Durrington  
**Part 28:** Housing allocation H3.6: Larkhill Road, Durrington

### The Council's response:

- 7.76** Where necessary, further assessment work has been undertaken to positively respond to representations received through the Regulation 19 consultation. Details of this work can be found in the updates to the relevant Community Area Topic Papers.

## 8 Conclusion and the need for proposed changes

- 8.1** As outlined above, this Statement presents all the comments received through the Regulation 19 – ‘pre-submission’ consultation. The comments have been analysed to draw out what the Council considers to be the main issues. The Council’s responses to these main issues are presented in Section 5 and **Appendices M and P**. In line with the Regulations, it is important to note that the Council has not sought to respond to every individual consultation response received. Instead, a general response to the main issues raised within the representations is presented in plan order.
- 8.2** The analysis of responses received and evidence provided by consultees has identified a need to make changes to the draft Plan. Such changes are proposed at this stage as they will need to be examined and are likely to be subjected to a further round of consultation through the Examination process. The Council fully acknowledges that it will be for the appointed Inspector to determine how proposed changes to the Plan are addressed through the Examination process.

This document was published by the Spatial Planning team, Wiltshire Council, Economic Development and Planning Services.

For further information please visit the following website:

<http://www.wiltshire.gov.uk/wiltshsgsiteallocationsplan.htm>

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