



# Wiltshire Housing Site Allocations Plan

**Focussed Consultation on the  
Council's Schedule of Proposed Changes  
and Associated Evidence Documents**

Consultation Report  
November 2018

## Wiltshire Council

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## 1. Introduction

- 1.1. In July 2018, Wiltshire Council submitted the draft Wiltshire Housing Site Allocations Plan (the Plan), along with a Schedule of Proposed Changes and supporting evidence to the Secretary of State for independent examination. Planning Inspector, Steven Lee BA (Hons) MA MRTPI has been appointed to undertake the examination.
- 1.2. The Plan will, once adopted, form part of the Development Plan for Wiltshire. It has been prepared to support the delivery of the Spatial Strategy set out within the Wiltshire Core Strategy (adopted January 2015).
- 1.3. The purpose of the Plan is to:
  - Allocate sites for housing to ensure the delivery of homes across the Plan period in order to help maintain a five-year land supply in each of Wiltshire's three Housing Market Areas (HMAs) over the period to 2026; and
  - Review and, where necessary, revise settlement boundaries in relation to the Principal Settlements of Salisbury and Trowbridge, Market Towns, Local Service Centres and Large Villages.
- 1.4. Following submission of the Plan in August 2018, the council received a procedural letter<sup>1</sup> from the Inspector. The letter explained that the Inspector's examination would take the Plan as submitted as the starting point for the examination. The council had also submitted the Schedule of Proposed Changes which set out a number of proposed changes that predominantly reflected the consultation responses received during the formal consultation period in Summer 2017. However, as the Schedule of Proposed Changes had not been consulted on, the Inspector took this opportunity to allow the council to carry out a period of focussed consultation on the proposed changes and other key evidence documents, to ensure that he can examine the submission Plan together with the changes that the council is proposing.
- 1.5. The council undertook the focussed consultation for a six week period from **Thursday 27 September to Friday 9 November 2018** and invited comments on the 'soundness' of the following document:
  - Schedule of Proposed Changes to Wiltshire Housing Site Allocations Plan – Consultation Document September 2018 (EXAM/01);
- 1.6. The focussed consultation also invited comments on the following updates to supporting evidence documents:
  - Sustainability Appraisal Revised September 2018 (EXAM/02A, EXAM/02A.1, EXAM/02B and EXAM/02C);
  - Update to the Assessment under the Habitats Regulations Assessment Addendum (September 2018) (EXAM/03)

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<sup>1</sup> Examiner's first procedural letter available at: <http://www.wiltshire.gov.uk/downloads/14171; Wiltshire Council's response to the first procedural letter available at: http://www.wiltshire.gov.uk/whsap-pc-01a-wiltshire-councils-response-to-pc-01-proposed-modifications.pdf>

1.7. In addition, the focussed consultation invited comments on the following supporting evidence documents that provide context to the Plan:

- Topic Paper 1 – Settlement Boundary Review Methodology (July 2018 Submission version) (TOP/01);
- Topic Paper 2 – Site Selection Process Methodology (July 2018 Submission version) (TOP/02);
- Topic Paper 3 – Housing Land Supply Addendum (July 2018 Submission version) (TOP/03C);
- Topic Paper 4 – Developing Plan Proposals Addendum (July 2018 Submission version) (TOP/04C);
- Devizes Community Area Topic Paper (July 2018 Submission version) (CATP/06);
- Malmesbury Community Area Topic Paper (July 2018 Submission version) (CATP/07);
- Salisbury Community Area Topic Paper (July 2018 Submission version) (CATP/13);
- Trowbridge Community Area Topic Paper (July 2018 Submission version - updated September 2018) (CATP/17a);
- Westbury Community Area Topic Paper (July 2018 Submission version) (CATP/19);
- Memorandum of Understanding: River Avon Special Area of Conservation Phosphate Neutral Development – Interim Mitigation (May 2018) (HRA/03);
- Heritage Impact Assessment Final Report Prepared by LUC (March 2018) (WHSAP/05);
- Stage 4a Site Landscape Assessment Part 2: Salisbury, Tidworth, Trowbridge, Warminster and Westbury Community Areas – Prepared by Wiltshire Council and The Environment Partnership (June 2017) (WHSAP/20);
- Stage 4a Site Landscape Assessment Part 3: Omission sites in the Chippenham, Devizes, Malmesbury, Salisbury, Warminster and Westbury Community Areas – Prepared by Wiltshire Council and The Environment Partnership (May 2018) (WHSAP/21);
- Consultation Statement Regulation 22 (1)(c) (July 2018 Submission version) (WHSAP/09);
- Consultation Statement Regulation 22 (1)(c) Appendices M and P (July 2018 Submission version) (WHSAP/11);
- Consultation Statement Regulation 22(1)(c) Appendix Q (July 2018 Submission version) (WHSAP/12);
- Appendix 3 to Cabinet Report 3rd July 2018 – Note on Elm Grove Field and Implications for Asset Transfer (July 2018) (WHSAP/04);
- Salisbury Transport Strategy – Draft Strategy Refresh 2018 (July 2018) (WHSAP/08);
- Trowbridge Transport Strategy Refresh – Strategy Refresh 2018 (May 2018) (WHSAP/07); and
- Draft minutes of the Cabinet meeting held on 3 July 2018 (DEM/03).

1.8. The consultation was advertised widely in accordance with the council's Statement of Community Involvement. All documents were made available on the council's website, main council offices and all council run libraries across Wiltshire. This provided all

interested parties the opportunity to comment on the published materials in advance of the Inspector commencing the formal public hearing sessions.

- 1.9. The purpose of this document is to explain the focussed consultation process that has been carried out, and to summarise the main issues arising. The document will assist the Inspector by helping to inform the matters to be discussed during the subsequent formal public hearing sessions.

## 2. **How to use this document**

2.1. This Consultation Statement is broken down into a number of sections and appendices that explain the focussed consultation process that has been carried out and identifies the main issues arising from the responses, as follows:

- Section 3 sets out the methodology that has been undertaken in carrying out the focussed consultation.
- Section 4 provides a statistical overview of the representations received through the consultation.
- Section 5 sets out a summary of what the council considers to be the main issues arising from the consultation.
- Section 6 provides a brief conclusion on the focussed consultation and introduces the appendices that follow.
- The Appendices to the Consultation Statement set out further details in respect of the consultation.

### 3. **Methodology for the focussed consultation**

- 3.1. In September 2018, the council embarked on a period of focussed consultation on a number of the documents submitted in support of the WHSAP submission to the Secretary of State. As explained in Section 1, this was to give interested parties an opportunity to comment on the Schedule of Proposed Changes that the council considers necessary to ensure the submission Plan is 'sound'; and to comment on amendments made to certain other evidence documents supporting the Plan.
- 3.2. The consultation was comprehensive and followed the prescription outlined in Wiltshire Council's Statement of Community Involvement (SCI)<sup>2</sup>. The council invited consultation responses over a 6-week period, which ran from **Thursday 27<sup>th</sup> September to Friday 9<sup>th</sup> November 2018**. A summary of responses to the Proposed Changes is provided at **Appendix A**. This is discussed further in Section 5 of this report.

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

- 3.3. The focussed consultation was widely advertised in the press and on social media. Organisations, groups and individuals set out within the Regulations<sup>3</sup> and the SCI were notified of the start of the consultation period and how to comment.

#### **How were people consulted?**

- 3.4. Consultees were made aware of the consultation through a variety of means.
- 3.5. In total, 1,413 consultees were directly contacted. This included 1,313 consultees contacted by email and 100 consultees contacted by post. A copy of the letter that was sent to consultees can be viewed at **Appendix B**, and a copy of the email can be found at **Appendix C**.
- 3.6. Opportunities for engagement with the consultation process were also widely advertised prior to commencement and included:
- Publication of a notice placed in local newspapers circulating across the county (see **Appendix D**)
  - Announcements of the consultation on various pages of the council's website (see **Appendix E**)
  - Press releases about the consultation (see **Appendix F**)
  - Communications via the council's Elected Wire notifying all Wiltshire councillors (see **Appendix G**)
  - Notifications via parish and town council newsletters (see **Appendix H**)
- 3.7. Through these various means, consultees were informed that the focussed consultation documents were available to view throughout the consultation period at the following locations:

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<sup>2</sup> Wiltshire Council Statement of Community Involvement (SCI), October 2017, available at: <http://www.wiltshire.gov.uk/downloads/9895>

<sup>3</sup> [The Town and Country Planning \(Local Planning\) \(England\) Regulations 2012](#)



- 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 and electronic format at all of council run libraries (list of libraries at **Appendix I**).
- 3.8. To aid consultees in the process of responding to the focussed consultation, a Guidance Note<sup>4</sup> was provided which set out instructions on the purpose of the consultation and how to submit comments.
- 3.9. Representors were given a number of ways to respond to the consultation. Comments could be submitted via the dedicated Consultation Portal<sup>5</sup> that had been set up specifically for this consultation. Alternatively, comments could be submitted by email or post to the Spatial Planning team.
- 3.10. Respondents were asked, where possible, to respond using one of two forms designed for the consultation. 'Form A'<sup>6</sup> was intended to be completed by respondents commenting on the soundness of the Schedule of Proposed Changes. To identify which of the proposed changes were being commented on, respondents were asked to quote the Proposed Change (PC) number corresponding with the PC numbers set out in the Schedule of Proposed Changes. 'Form B'<sup>7</sup> was intended to be completed by respondents commenting on any of the other consultation documents, that are listed in paragraph 1.6 and 1.7 above.
- 3.11. Considering the focussed nature of the subject matter, the coverage and penetration of the consultation was considerable. However, following the close of the consultation the council unfortunately identified an administrative error that had resulted in 400 consultees in the council's consultee database (approximately 22% of all consultees) not being directly notified about the consultation (i.e. written to). The breakdown of those who were not directly notified is as follows:
- South Gloucestershire District Council (incorrect email address, but subsequent confirmation was received that they had no comments on the published materials);
  - North Wessex Downs AONB Management Board (although a consultation response was received);
  - Coombe Bissett Conservation Community Group;
  - Paxcroft Mead Residents Association (commented at the informal consultation stage only);
  - West Wilts Watch Group (commented at the informal consultation stage only);

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<sup>4</sup> Guidance Note Sept 2018, available at: <http://wiltshire.objective.co.uk/file/5075801>

<sup>5</sup> Schedule of Proposed Changes – Consultation Portal, available at [http://wiltshire.objective.co.uk/portal/spatial\\_planning/sites\\_dpd/proposed\\_changes\\_on\\_draft\\_whsap/schedule\\_of\\_proposed\\_changes\\_to\\_the\\_draft\\_whsap?tab=info](http://wiltshire.objective.co.uk/portal/spatial_planning/sites_dpd/proposed_changes_on_draft_whsap/schedule_of_proposed_changes_to_the_draft_whsap?tab=info)

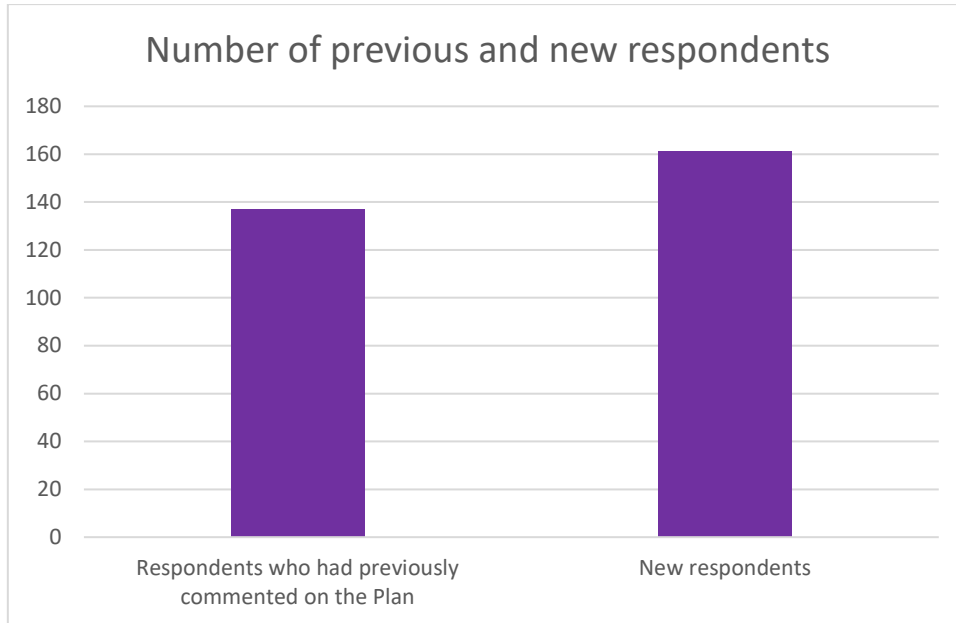
<sup>6</sup> Form A, available at <http://wiltshire.objective.co.uk/file/5075862>

<sup>7</sup> Form B, available at <http://wiltshire.objective.co.uk/file/5075861>

- Marlborough Neighbourhood Plan Steering Group (commented on options at the town through the informal consultation stage);
  - Scout Association (commented at the informal consultation stage only);
  - Friends of Abberd Brook (commented on options at Calne through the informal consultation stage);
  - 355 individual members of the public; and
  - 8 neighbouring Parish Councils (incorrect Clerk details).
- 3.12. In addition to the consultees above that were not directly notified about the consultation, 185 Parish/Town Councils were not written to through a consultation letter, but received two newsletters sent directly to them which included the text from the letters the council sent to consultees.
- 3.13. Despite not directly contacting a number of consultees, the consultation was nonetheless accessible and widely promoted, thereby offering ample scope for all those with an interest in the Plan to comment. Indeed, of those who were not directly notified, the council nonetheless received comments from some of these consultees on the published materials. The consultation also attracted attention from a significant number of people who had not commented before.
- 3.14. It could therefore be considered that the administrative error did not negate the adequacy of the consultation. If the Inspector considers that further targeted consultation is needed at this stage in the process to address the administrative error this will be undertaken by the council and summarised in an addendum to this Consultation Report.

#### 4. **Statistical analysis of the representations received**

- 4.1. Over the consultation period 541 duly made comments were received from 298 contributing consultees.
- 4.2. The chart below shows the comparison between the number of respondents who had made previous comments on a consultation relating to the Plan, against the number of new respondents who had not previously commented on the Plan. This shows that there were more new respondents (161) than respondents who had previously commented on the Plan (137).



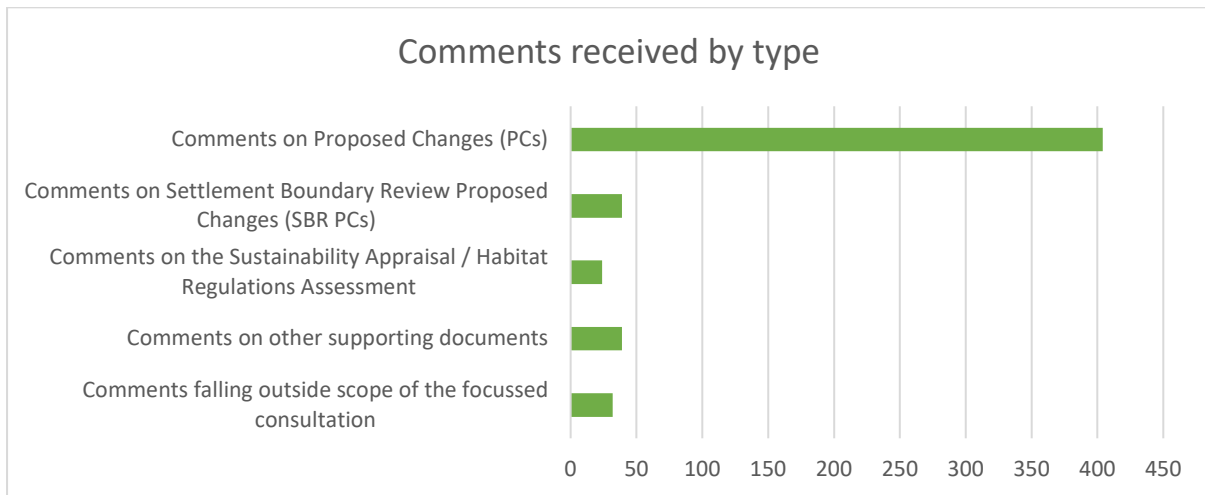
- 4.3. One petition in relation to the proposal (WHSAP/04) to extend the allocation area of H2.1 Elm Grove Farm, Trowbridge, to encompass the Queen Elizabeth II Field for delivering a new Primary School was presented to the Trowbridge Area Board meeting and then formally submitted in response to the consultation. The petition contained 348 signatures.
- 4.4. The comments submitted to the council were processed, logged with unique ID numbers, and made available to view in full on the council's Consultation Portal. Where necessary, representations from consultees which dealt with a number of different issues were split into separate comments for ease of analysis. Each comment submitted by consultee was given an ID number.
- 4.5. In the weeks following the close of the consultation period, representations were received from 5 consultees. These comments were logged separately and marked as 'unduly made' representations because they were received outside of the formal consultation period. These are referred to further in paragraph 4.19 below.

#### **Analysis of consultation topics**

- 4.6. Of the 541 duly made comments, the breakdown by type of consultee was as follows:

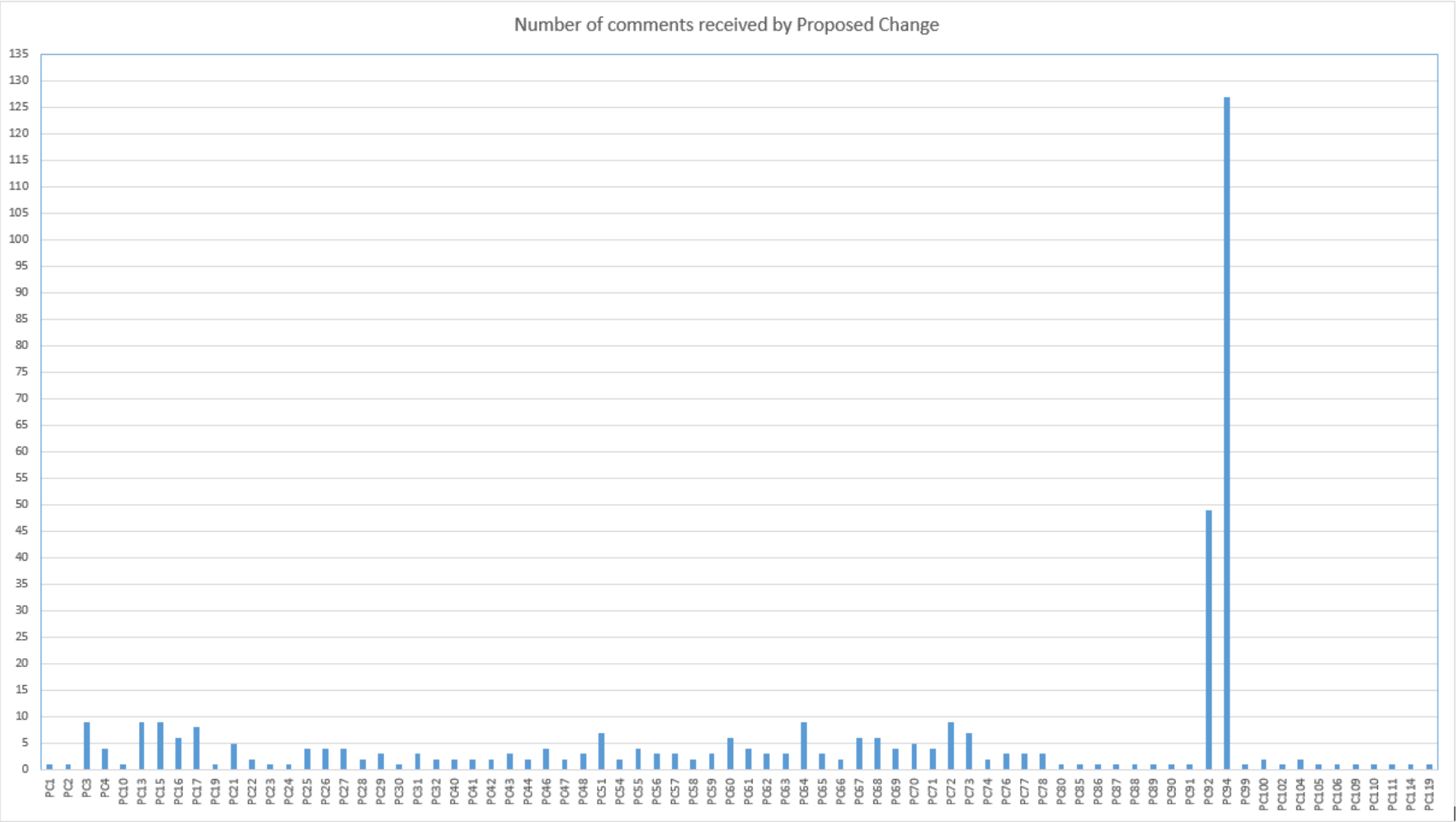
- Comments from members of the public – **276 comments**
- Comments from landowners or developers – **190 comments**
- Comments from Parish or Town Councils, or neighbourhood planning groups – **25 comments**
- Comments from residents' associations – **10 comments**
- Comments from statutory consultees – **21 comments**
- Comments from adjoining planning authorities – **17 comments**
- Comments from Wiltshire Councillors – **2 comments**

4.7. Of the comments submitted, the breakdown of comment type was as follows:



4.8. The data shows that comments predominantly related to the Proposed Changes that are proposed in respect of the policies and supporting text, rather than the Settlement Boundary Review proposals, or other supporting evidence documents.

4.9. Of the 408 comments relating to the changes set out in the Schedule of Proposed Changes (excluding those relating to the Settlement Boundary Review), the breakdown of comments was as follows:



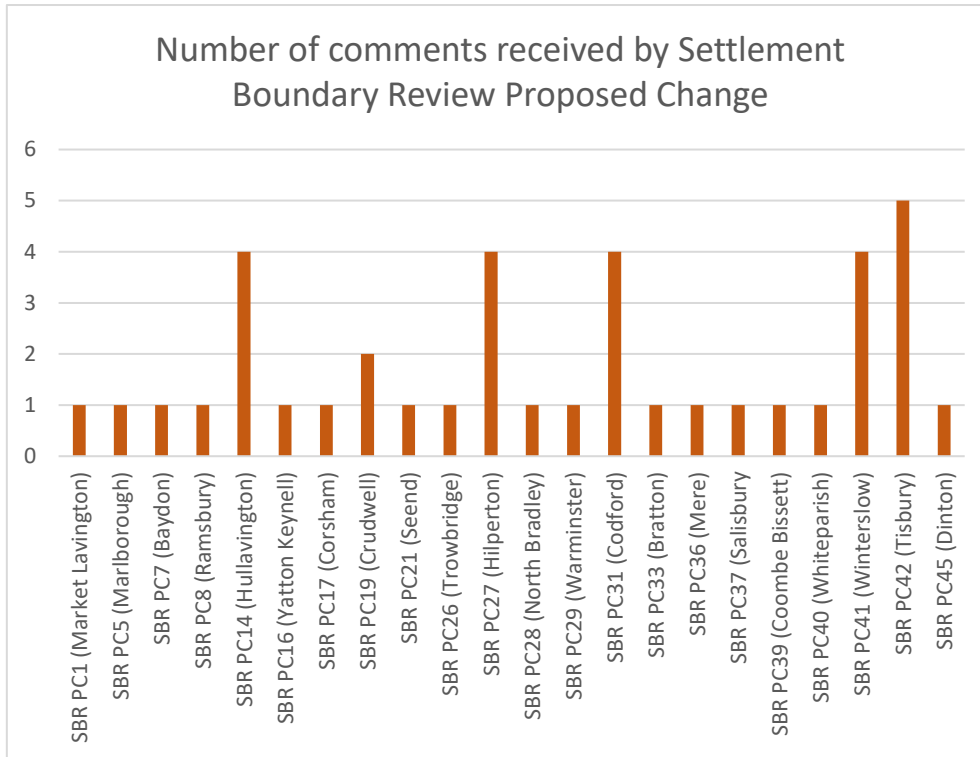
4.10. The data reflects that a significant proportion of the comments received (127) were in response to PC94, which concerns the number of proposed dwellings at H2.13: Court Orchard/Cassways, Bratton.

4.11. A smaller, but also significant number of responses (49) were submitted, which were predominantly in support of PC92, which proposes the removal of a housing allocation at Crudwell. A smaller number of representations were focussed on a range of Proposed Changes including – PC3, PC13, PC15, PC16, PC17, PC51, PC64, PC67, PC72 and PC73.

4.12. There were no comments submitted in relation to the following proposed changes:

- PC5
- PC6
- PC7
- PC8
- PC9
- PC11
- PC12
- PC14
- PC18
- PC20
- PC33
- PC34
- PC35
- PC36
- PC37
- PC38
- PC39
- PC45
- PC49
- PC50
- PC52
- PC53
- PC75
- PC79
- PC81
- PC82
- PC83
- PC84
- PC93
- PC95
- PC96
- PC97
- PC98
- PC101
- PC103
- PC107
- PC108
- PC112
- PC113
- PC115
- PC116
- PC117
- PC118
- PC120
- PC121
- PC122
- PC123
- PC124
- PC125
- PC126
- PC127
- PC128
- PC129
- PC130
- PC131
- PC132
- PC133
- PC134
- PC135

4.13. Of the 39 comments relating to the Settlement Boundary Review Proposed Changes (SBR PCs), the numerical breakdown of comments was as follows:



4.14. The data shows that marginally more responses to the proposed changes to the Settlement Boundary Review were made in relation to the settlements of Hullavington, Hilperton, Codford, Winterslow and Tisbury.

4.15. There were no comments submitted in relation to the proposed changes to the settlement boundaries of the following settlements:

- SBR PC2 Rowde
- SBR PC3 West Lavington & Littleton Pannell
- SBR PC4 Worton
- SBR PC6 Aldbourne
- SBR PC9 Burbage
- SBR PC10 Tidworth
- SBR PC11 Ludgershall
- SBR PC12 Derry Hill and Studley
- SBR PC13 Christian Malford
- SBR PC15 Sutton Benger
- SBR PC18 Colerne
- SBR PC20 Sherston
- SBR PC22 Semington
- SBR PC23 Royal Wootton Bassett
- SBR PC24 Cricklade
- SBR PC25 Purton
- SBR PC30 Chapmanslade
- SBR PC32 Sutton Veny
- SBR PC34 Amesbury
- SBR PC35 Tilshead
- SBR PC38 Downton
- SBR PC43 Wilton
- SBR PC44 Broad Chalke

4.16. The number of comments that were received relating to the supporting evidence and contextual documents can be summarised as follows:

- Sustainability Appraisal updated documents EXAM/02A, EXAM/02A.1, EXAM/02B and EXAM/02C (**19 comments**);

- Habitats Regulations Assessment updated documents EXAM/03 and HRA/3 (**3 comments**);
- Topic Paper 2 Site Selection Process Methodology TOP/02 (**4 comments**);
- Topic Paper 3 Housing Land Supply Addendum TOP/03C (**2 comments**);
- Topic Paper 4 Developing Plan Proposals Addendum TOP/04C (**1 comment**);
- Malmesbury Community Area Topic Paper CATP/07 (**1 comment**);
- Salisbury Community Area Topic Paper CATP/13 (**1 comment**);
- Trowbridge Community Area Topic Paper CATP/17a (**3 comments**);
- Westbury Community Area Topic Paper CATP/19 (**17 comments**);
- LUC Heritage Impact Assessment WHSAP/05 (**2 comments**);
- Stage 4a Site Landscape Assessment Part 3: Omission sites in the Chippenham, Devizes, Malmesbury, Salisbury, Warminster and Westbury Community Areas WHSAP/21 (**1 comment**);
- Consultation Statement Regulation 22 (1)(c) WHSAP/09 (**1 comment**);
- Consultation Statement Regulation 22 (1)(c) Appendices M and P WHSAP/11 (**4 comments**);
- Appendix 3 to Cabinet Report 3rd July 2018 – Note on Elm Grove Field and Implications for Asset Transfer WHSAP/04 (**2 comments**); and
- Salisbury Transport Strategy – Draft Strategy Refresh 2018 WHSAP/08 (**1 comment**).

4.17. No comments were received in relation to the following supporting contextual documents:

- Topic Paper 1 Settlement Boundary Review Methodology TOP/01;
- Devizes Community Area Topic Paper CATP/06;
- Stage 4a Site Landscape Assessment Part 2: Salisbury, Tidworth, Trowbridge, Warminster and Westbury Community Areas WHSAP/20;
- Consultation Statement Regulation 22(1)(c) Appendix Q WHSAP/12;
- Trowbridge Transport Strategy Refresh – Strategy Refresh 2018 WHSAP/07; and
- Wiltshire Council Draft minutes of the Cabinet meeting held on 3 July 2018 DEM/03.

4.18. There were 33 comments submitted which were relevant, particularly in terms of our on-going duty to cooperate commitments (e.g. those from neighbouring authorities), but nonetheless considered to fall outside of the scope of this focussed consultation – i.e. they didn't relate specifically to the wording within the Proposed Changes. These comments were varied in theme, and include remarks on the following topics:

- Reporting that the respondent had no comments to make on the focused consultation;
- The council's duty to cooperate where the comments from adjoining authorities either supported the draft Plan, or confirmed that the Plan raised no strategic issues;
- A reiteration of site specific comments about the principle of allocating land proposed in the WHSAP, including sites proposed at Trowbridge and Salisbury;
- Comments on individual planning applications;
- Suggested further amendments to settlement boundaries at locations which the council have proposed further changes.



4.19. There were 5 comments recorded as 'unduly made', having been submitted to the council after the close of the consultation period. These comments are not summarised in the appended summary of responses, but have nonetheless been made available to the Inspector to consider at his discretion. The unduly made representations related to:

- The council's duty to cooperate and confirmation from adjoining authorities that they had no comments to make in respect of the Plan and the council's Schedule of Proposed Changes;
- PC92 (removal of the proposed allocation at Crudwell);
- PC94 (the proposed allocation at Bratton); and
- SBR PC42 (the proposed amendments to the settlement boundary of Tisbury).

## 5. **Summary of responses and main issues arising**

- 5.1. Section 5 sets out an overview of what are considered to be the 'main issues' arising from the focussed consultation. These are the main points concerning the potential soundness of the proposed changes to the Plan and may inform the basis of subsequent examination hearing sessions.
- 5.2. A summary of all the comments that were received during the focussed consultation is included at **Appendix A**. This summary is split into separate tables by the following themes:
- Proposed Changes (PCs), excluding Proposed Changes to the settlement boundaries, ordered as they appear in the Schedule of Proposed Changes<sup>8</sup>;
  - Settlement Boundary Review Proposed Changes (SBR PCs), ordered as they appear in the Schedule of Proposed Changes;
  - Comments relating to the Sustainability Appraisal updates;
  - Comments relating to the Habitats Regulations Assessment updates;
  - Comments relating to the other supporting documents, as listed in paragraph 1.7; and
  - Comments relating to matters that are considered to fall outside of the scope of this focussed consultation.
- 5.3. Each summary table includes the unique ID numbers of the representors who made comments on each of the themes.
- 5.4. A full schedule of the representations that were submitted to the focussed consultation is provided in **Appendix J** and available to view on the council's website. Original copies of all the representations received have been submitted to the Inspector.

### **Specific and General Consultation Bodies: summary of responses**

- 5.5. Specific and General consultation bodies were consulted on the focussed consultation. A summary of the comments received is set out below:

#### **Historic England**

*(Comment ID nos 186, 187, 188, 189, 190)*

#### Summary of issues raised:

Historic England (HE) comment on the proposed changes that have been made in relation to the site allocations that have been subject to Historic Impact Assessment:

- **PC61** (H2.2: Land off the A363 at White Horse Business Park, Trowbridge): HE note the proposed modifications. It is queried whether the Plan might bring about

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<sup>8</sup> Where possible, the summaries in the Proposed Change tables only relate to the issue covered by the relevant Proposed Change. However, in some instances where comments related to a specific Proposed Change they also cover other (often more strategic) objections to the Plan as a whole, these have also been included within the summaries. Such issues are not new to the council, and are issues that have been raised through earlier consultation on the pre-submission draft Plan. The council consider their inclusion in objections to the Proposed Changes consultation to be symptomatic of a broad message that some respondents do not consider the scope of the Proposed Changes adequately addresses issues that were raised in previous representations.

- an opportunity to preserve the adjacent cemetery which is 'at risk', and clarification is sought on how archaeological significance should be addressed.
- **PC68** (H2.4: Church Lane, Trowbridge): HE note and welcome the proposed modifications. It is suggested the Plan might be more specific regarding the need to avoid redevelopment of the paddock adjacent to Church Lane and rear of the listed buildings fronting Frome Road. Clarification is also sought on how archaeological significance should be addressed.
  - **PC72** (H2.6: Southwick Court, Trowbridge): HE note and welcome the proposed modifications. To avoid undue harm to the significance of Southwick Court, the design of future road across the site and junction off the A361 (Frome Road) would require a very sensitive bespoke approach; a rural/parkland/ country estate typology with discreet low level lighting and unobtrusive signage to minimise harmful intrusion within this historic landscape. The Plan should clearly set out such expectations.
  - **PC77** (H2.7: East of the Dene, Warminster): HE note the proposed modifications. HE consider at present it cannot be demonstrated that a residential scheme could come forward to accord with the Plan objectives and specific conditions for the site; legislation, national policy and guidance in respect of the great weight that needs to be afforded the conservation of affected heritage assets and their setting. HE currently consider the site allocation is inappropriate.
  - **PC104** (H3.3: North of Netherhampton Road, Salisbury): HE note and welcome the proposed modifications. The site is important in its relationship to historic Salisbury, its Cathedral and wider landscape setting. HE have some doubts about the possibility of a scheme according with the Plan objectives, site specific conditions, national policy and guidance in respect of the great weight that needs to be afforded the conservation of affected heritage assets and their setting, primarily in this respect, Salisbury Cathedral. HE await the outcome of further work from the developer before the proposed allocation can be considered appropriate. Clarification is also sought on how archaeological significance should be addressed.

### **Environment Agency**

*(Comment ID nos 430, 431, 432, 433)*

#### Summary of issues raised:

The Environment Agency (EA) comment that the proposed changes address the matters that were raised by the EA in their pre-submission consultation response, and that the proposed changes make the Plan sound, provided all other related Plans (e.g. The Hampshire Avon Nutrients Management Plan) are carried forward and implemented. Additional comments are made in relation to:

- **PC13:** It is requested that the local authority check whether the amount of Flood Zone 1 on the Upper Studley and Elizabeth Way sites can adequately accommodate the proposed increase in housing.
- **PC111:** No objection to the additional proposed allocation at The Yard, Salisbury.
- **PC80:** In relation to H2.8 (Bore Hill Farm, Warminster), the EA wish to add to previous comments made about the potential for odour from the adjoining biodigester. There are existing records of odour complaints and this is very likely to be an issue for new residents at Bore Hill Farm in the future. Wiltshire should therefore carefully consider the allocation of the site for housing to ensure appropriate design measures are incorporated to address the relationship between the biodigester and future residents. Notwithstanding this, the EA do not object to the allocation.

**Natural England**

*(Comment ID no 86)*

Summary of issues raised:

Natural England (NE) confirm that none of the changes proposed lead them to find the Plan unsound. However, the **Habitats Regulation Assessment** for the Plan is awaited and until such time as NE are satisfied that the Plan will not have an adverse effect on the integrity of any relevant designated sites, NE cannot advise that the Plan is sound in HRA terms.

**Network Rail**

*(Comment ID no 285)*

Summary of issues raised:

**PC43:** Network Rail require that any funds required for necessary rail crossing improvements or rerouting of Berrys Crossing (LUDG1) are provided by the developer, and should be considered within any viability testing for the site, in collaboration with Network Rail.

**National Grid**

*(Comment ID no 43)*

Summary of issues raised:

National Grid had no comments to make in relation to this consultation.

**Sport England**

*(Comment ID no 44)*

Summary of issues raised:

Sport England provide general advice that no sites including playing fields should be allocated for development if this would include the loss of playing field or prejudice the use of the playing field unless it is in line with Wiltshire adopted playing pitch strategy.

**Wiltshire CCG Commissioning Group**

*(Comment ID no 177)*

Summary of issues raised:

The CCG comment that when the LPA grants permission for housing, this has a direct effect on the provision of health care in the area affected by that new housing. Contributions should be sought to support primary and secondary care development, in particular for GP premises. The CCG do not object to the draft Allocations Plan but wish to be fully consulted on the Plan as it proceeds and on any applications for housing of, say above 50 dwellings, in order that a case can be made for financial support via S106 or CIL where appropriate and look to the LPA to support those bids.

**Highways England**

*(Comment ID nos 183, 184, 185)*

Summary of issues raised:

Highways England note that there are 250 additional dwellings proposed in Trowbridge, and that sites within Market Lavington (80 dwellings) and Crudwell (50 dwellings) have been omitted.

Highways England welcomes the updates proposed by **PC74**, **PC100** and **PC106** which strengthen the requirement for proposals to be supported by appropriate transport assessment and mitigation necessary to ensure that impact on the Strategic Road Network is not severe. Highways England have been, and will continue to work with, Wiltshire Council to refresh the Salisbury Transport Strategy. Highways England is also progressing a study to identify potential options to improve the existing performance and operation of the A36 and to help to facilitate growth aspirations across the City.

**Cranborne Chase and West Wiltshire Downs Area of Outstanding Natural Beauty**

*(Comment ID no 397)*

Summary of issues raised:

Support for the amendments proposed to the settlement boundary of Coombe Bissett, as set out in **SBR PC39**.

**North Wessex Downs Area of Outstanding Natural Beauty**

*(Comment ID no 383)*

Summary of issues raised:

Objection to the proposed amendment to the settlement boundary of Aldbourne, as set out in **SBR PC7**. The amendment does not comply with the settlement boundary review methodology in that it includes land and buildings that are visually and physically separate from the village.

## Neighbouring Authorities: summary of responses

5.6. Neighbouring authorities were consulted on the focussed consultation. A summary of the comments received from the neighbouring authorities who responded to the consultation is set out below.

### **New Forest District Council** (Comment ID nos. 442, 443)

#### Summary of issues raised:

- The majority of the issues identified and the changes outlined are appropriate.
- There remain some outstanding issues in the (South Wiltshire) Downton area that have implications that could affect the New Forest European nature conservation sites.
- The Housing Site Allocations Plan now proposes 190 dwellings for the Downton area which will be within 5km of the New Forest SPA and will have a recreational impact on the New Forest Nature 2000 sites.
- The HRA fails to acknowledge the recreational impacts that will arise from development so close to the New Forest Natura 2000 sites and fails to address the adverse impacts through appropriate mitigation measures.
- NFDC objects to the commitment to 190 dwellings at Downton without ensuring the required mitigation to avoid adverse effects on the integrity of the New Forest European sites is provided.
- As currently drafted the Plan is contrary to the Habitats Regulations.

### **New Forest National Park Authority** (Comment ID no. 255)

#### Summary of issues raised:

- The Authority considers that Wiltshire Council needs to address impacts on the protected habitats of the New Forest through ensuring that adequate habitat mitigation measures are in place.
- The Authority is aware that a New Forest Mitigation Strategy referred to in paragraph 6.77 of the adopted Core Strategy (January 2015) hasn't been produced to date.
- 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 - it was suggested that these could provide a useful starting point for any discussions on the production of a mitigation strategy in line with Wiltshire Council's obligations under the Habitats Regulations.
- There is a clear need for local planning authorities around the New Forest to adopt a more strategic cross-boundary approach to habitat mitigation measures.
- Without provision for mitigation both in the recent past and moving forward, the Plan as currently drafted, fails to comply with the Habitats Regulations.

**Bath and North East Somerset District Council**

*(Comment ID no. 539)*

Summary of issues raised:

- Noted that in the proposed changes amendments to the housing capacity figures for allocated sites including at Trowbridge (which has a close relationship with Bath) are proposed.
- There are no outstanding issues or concerns to B&NES Council related to the Housing Site Allocations Plan.
- Confirmed that it is not considered necessary to prepare a Statement of Common Ground (as referenced in the NPPF, para 27) beyond what is being prepared for the West of England Joint Spatial Plan.

**Hampshire County Council**

*(Comment ID no. 279)*

Summary of issues raised:

- Whilst we have no comments to directly make, we would like to take the opportunity to highlight that there are two safeguarded mineral and / or waste sites on the Hampshire / Wiltshire border - Dean Hill MOD site, West Dean and Pound Bottom.
- Safeguarding requires any proposed development to avoid prejudicing the continued use of safeguarded minerals and waste infrastructure.

**North Dorset District Council**

*(Comment ID no. 235)*

Summary of issues raised:

- NDDC has responded to consultations on this proposed DPD in June 2016 and September 2017.
- Those comments relate to the potential need for allocating a site for development in Wiltshire to meet the needs of Shaftesbury (a town in our District).
- NDDC assumes that if there is anything in this consultation that would likely have an impact on the District then Wiltshire Council would draw our attention to it and seek meaningful consultation under the duty to cooperate.

**Test Valley Borough Council**

*(Comment ID nos. 191, 192, 193, 194, 195)*

Summary of issues raised:

- Confirm no objection to most relevant changes (PC40-44) concerning development at Ludgershall.

5.7. The following neighbouring authorities responded to say that they had no comments to make on the focussed consultation:

- Gloucestershire County Council
- South Somerset District Council
- Oxfordshire County Council
- Somerset County Council
- Mendip District Council
- Dorset County Council
- Vale of White Horse Council
- South Oxfordshire District Council

5.8. The following neighbouring authorities did not respond to the focussed consultation:

- South Gloucestershire Council
- North Somerset Council
- Swindon Borough Council
- West Berkshire Council
- Cotswold District Council
- East Dorset District Council<sup>9</sup>

### **Main Issues**

5.9. The following section distils and summarises what the council considers to be the main issues arising from the focussed consultation. These are numbered and cover both thematic and geographical issues.

5.10. **Main Issue 1: Housing Land Supply in the North and West HMA.  
The Proposed Changes do not go far enough to ensure that enough housing will be delivered in the North and West HMA.**

The assessment of housing land supply is questioned. It is argued that the council should use the Sedgefield method in the calculation of housing land supply, rather than the Liverpool approach. There have been significant delays in delivery of strategic sites (such as Ashton Park at Trowbridge), with knock-on effects on housing land supply across Housing Market Areas. The council's calculation of housing land supply differs between the methodology advocated in the 2012 NPPF and that used in the 2018 NPPF which will render housing land supply calculations out of date once the Plan is adopted. There is an over reliance on windfall delivery and the emerging Local Plan Review to address indicative housing shortfalls across the Plan area. It therefore follows that additional housing sites should be allocated.

5.11. **Main Issue 2: Housing Land Supply in the South HMA.  
The Proposed Changes do not go far enough to ensure that enough housing will be delivered in the South HMA.**

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<sup>9</sup> The council received correspondence from this authority but it was a generic response unrelated to the consultation on the Schedule of Proposed Changes



The assessment of housing land supply is questioned. It is argued that the council should use the Sedgfield method in the calculation of housing land supply, rather than the Liverpool approach. There have been significant delays in delivery of strategic sites (such as Churchfields and Fugglestone Red) with knock on effects on housing land supply in the Housing Market Area. The council's calculation of housing land supply differs between the methodology advocated in the 2012 version of the NPPF and that now used in the 2018 NPPF which will render housing land supply calculations out of date once the Plan is adopted. There is an over reliance on windfall delivery and the emerging Local Plan Review to address indicative housing shortfalls. It therefore follows that additional housing sites should be allocated.

**5.12. Main Issue 3: The Proposed Changes do not provide a sound solution to the relationship between the Plan and emerging neighbourhood plans.**

The council have misapplied its own methodology in the decision to delete proposed housing allocations at Market Lavington (PC46, PC47, PC48). There is no sound reasoning for proposing to delete the sites, particularly as there remains an indicative shortfall of housing in the Devizes Community Area Remainder to address. Conversely, the Proposed Changes have received support from Market Lavington Parish Council.

The council have misapplied its own methodology in the decision to delete proposed housing allocations at Crudwell (PC92). There is no sound reasoning for proposing to delete the site. Conversely, the Proposed Changes have received support from Crudwell Parish Council.

The emerging Bratton Neighbourhood Plan should be allowed to progress with an alternative allocation (PC94) than that proposed by Wiltshire Council. There is no evidence of there being a strategic need for Wiltshire Council to allocate a housing site at Bratton. The community are best able to address local housing need through the Neighbourhood Plan.

Concern from North Bradley Parish Council that the Proposed Changes do not adequately take account of the work carried out by the neighbourhood plan steering group. However, the Parish Council does not wish to impede the delivery of the site and recognises the need to avoid conflict between higher level plans and the NDP, and therefore supports allocations H2.1, H2.2 and H2.6.

**5.13. Main Issue 4: The Proposed Changes do not meet the Wiltshire Core Strategy housing requirement for Trowbridge.**

**5.14. Main Issue 5: The Proposed Changes do not adequately address the constraints on the proposed housing allocations at Trowbridge.**

H2.1 Elm Grove Farm (relevant Proposed Change references PC54, PC55, PC56, PC57, PC58, WHSAP/04):

- Loss of green/recreation space resulting from the proposed inclusion of the Queen Elizabeth II Field ('Elm Grove Field') within the allocation boundary;
- The justification and hence soundness of the council's proposal to increase the projected housing quantum from approximately 200 to 250 dwellings.

H2.2 Land off the A363 at White Horse Business Park (relevant Proposed Change references PC59, PC60, PC61, PC62):

- The justification and hence soundness of the council's proposal to increase the projected housing quantum from approximately 150 to 175 dwellings.
- Potential ecological constraints on site that would lead to delays in the delivery of housing on site;
- Potential for harm to heritage assets;
- Potential archaeological significance of the site and limitations on the developable area;
- Risk of coalescence between Trowbridge and North Bradley.

H2.3 Elizabeth Way (relevant Proposed Change references PC63, PC64, PC65, PC66):

- The justification and hence soundness of the council's proposal to increase the projected housing quantum from approximately 225 to 355 dwellings;
- Lack of policy consistency with the recently made Hilperton Neighbourhood Plan;
- Potential ecological constraints on site that would lead to delays in the delivery of housing on site;
- Site drainage considerations;
- Potential for harm to heritage assets;
- Risk of coalescence between Trowbridge and Hilperton.

H2.4 Church Lane (relevant Proposed Change references PC67, PC68, PC69):

- Potential harm to hedgerows protected under the Hedgerow Act;
- Site drainage considerations;
- Potential for harm to heritage assets;
- Potential archaeological significance of the site and limitations on the developable area;
- Potential harm to ecology.

H2.5 Upper Studley (relevant Proposed Change references PC70, PC71):

- The justification and hence soundness of the council's proposal to increase the projected housing quantum from approximately 20 to 45 dwellings;
- Potential harm to ecology, including protected bat species;
- Site drainage considerations.

H2.6 Southwick Court (relevant Proposed Change references PC72, PC73):

- Potential harm to hedgerows protected under the Hedgerow Act;
- Potential harm to ecology;
- Site drainage and flooding;
- Potential for harm to heritage assets;
- Potential archaeological significance of the site and limitations on the developable area.

**5.15. Main Issue 6: The strategy for housing delivery at Trowbridge places too much reliance on the outcome of the Bat Mitigation Strategy, which is currently unknown.**

**5.16. Main Issue 7: The Proposed Changes do not adequately address the constraints on the proposed housing allocations at Salisbury.**

H3.1 Netherhampton Road (relevant Proposed Change references PC99, PC100, PC101)

- Potential landscape harm caused by development proposals above the 75m contour line;
- Concerns over adequacy of the strategy for development utilising the existing road network (e.g. congestion on routes into Salisbury and pressure on junctions).

H3.3 North of Netherhampton Road (relevant Proposed Change reference PC104)

- Potential harm to heritage assets and their settings (particularly Salisbury Cathedral);
- Potential archaeological significance of the site and limitations to the developable area.

H3.4 Land at Rowbarrow (relevant Proposed Change references PC109, PC110)

- Potential for development leading to landscape harm;
- Potential harm to the heritage setting of a nearby Scheduled Monument.

**5.17. Main Issue 8: The Proposed Changes do not adequately address the constraints on the proposed housing allocations at Warminster.**

H2.7 East of The Dene (relevant Proposed Change references PC76, PC77, PC78):

- Inadequate response to the potential for harm to the heritage assets and their settings within and adjacent to the site;
- Lack of Strategic Flood Risk Assessment Level 2 for Warminster.

H2.8 Bore Hill Farm (relevant Proposed Change reference PC80):

- Potential odour impacts arising from the site's proximity to the adjacent anaerobic biodigester plant.

**5.18. Main Issue 9: The Proposed Changes do not adequately address the constraints on the proposed housing allocation at Bratton.**

H2.13 Court Orchard/Cassways (relevant Proposed Change reference PC94)

- There is no strategic need for a housing allocation at Bratton;
- The council's proposed reduction in the number of dwellings to be delivered does not address previously raised concerns regarding suitability of the site.

**5.19. Main Issue 10: The Proposed Changes do not address uncertainties surrounding the Habitat Regulations Assessment and effects of development on levels of phosphate in the River Avon SAC**

**5.20. Main Issue 11: The Proposed Changes do not address uncertainties surrounding the Habitat Regulations Assessment and effect of development on New Forest European Sites**

- 5.21. The main issues set out above are considered to be those matters that are of a direct consequence of the amendments presented in the council's Schedule of Proposed Changes. However, the council recognise that number of comments were received that related to matters that fall outside of the scope of the Proposed Changes (i.e. they did not relate specifically to Proposed Changes). These comments were predominantly repeated comments from representors who objected to the pre-submission draft Plan. In essence, the comments related to strategic matters (e.g. housing land supply and the adequacy of the draft Plan in terms of addressing indicative housing supply in various locations); and interpretation of the council's evidence base. The council considers that these types of responses, to this particular consultation, to be symptomatic of a broad message that some respondents do not consider the scope of the Proposed Changes have adequately addressed issues that were raised in previous representations. While this is not considered to be a 'Main Issue' directly arising from this consultation, the council are nonetheless drawing this to the attention of the Inspector to ensure that such matters can be appropriately considered through the examination of the Plan.
- 5.22. A further matter which has arisen from the consultation, but which does not form a Main Issue, is that there are a number of responses relating to Bratton which appear to suggest a misunderstanding about the sites proposed to be allocated at the village. The council's amendments to the assessment of SHELAA site 738, have resulted in some changes to the stage that site 738 was assessed against, which is reflected in the changes shown to the Westbury Community Area Topic Paper (CATP/19). It is apparent that some respondents have misinterpreted the reassessment to mean that site 738 is proposed to be allocated in addition to H2.13 Court Orchard/Cassway. For the avoidance of doubt, the council would like to clarify to the Inspector that H2.13 remains the only proposed allocation at Bratton, and that site 738 has been ruled out at Stage 4a of the site assessment process.

## 6. **Conclusion**

- 6.1. As outlined above, this Consultation Statement summarises the comments that have been received through the focussed consultation on the Schedule of Proposed Changes, the revised Sustainability Appraisal, the updated Assessment under the Habitats Regulations Assessment Addendum, and other supporting documents, as listed in paragraph 1.7.
- 6.2. The comments have been analysed to draw out what the council considers to be the 'main issues' for the Inspectors consideration, as set out in Section 5. For the purpose of analysis representations have been broken down and attributed, where possible, to individual Proposed Changes. However, all representations received have been made available in full on the council's website.
- 6.3. What follows are a series of appendices that summarise the issues raised against the Proposed Changes that were commented on. Further appendices provide information relating to how the consultation was undertaken.

## **Appendix A: Summary of responses to Proposed Changes**

<b>PC1</b> (Consequential change resulting from PC46, PC47 and PC48.)		
<b>WHSAP Page/Paragraph/Table:</b>	Contents page	
<b>Reason for proposed change:</b>	Update to reflect the proposed removal of housing allocations at Market Lavington for the reasons explained in PC46, PC47 and PC48.	
<b>Proposed change:</b>	Under Contents section 5: Housing Site Allocations, delete: <del>Devizes Community Area</del>	
No. of responses received:	1	
<b>Comment ID No.</b>	<b>Consultee ID</b>	<b>Agent ID</b>
<b>130</b>	1138002	1138006
<b>Summary of comments received:</b>		
<ul style="list-style-type: none"> <li>The term 'Devizes Community Area' is deleted. The word 'Remainder' should also be deleted.</li> </ul>		

<b>PC2 (Consequential change resulting from PC92.)</b>		
<b>WHSAP Page/Paragraph/Table:</b>	Contents page	
<b>Reason for proposed change:</b>	Update to reflect the proposed removal of the housing allocation at Crudwell, for the reasons explained in PC92.	
<b>Proposed change:</b>	Under Contents section 5: Housing Site Allocations, delete: <del>Malmesbury Community Area</del>	
<b>No. of responses received:</b>	1	
<b>Comment ID No.</b>	<b>Consultee ID</b>	<b>Agent ID</b>
<b>131</b>	1138002	1138006
<b>Summary of comments received:</b>		
<ul style="list-style-type: none"> <li>PC2 - the term 'Malmesbury Community Area' is deleted. The word 'Remainder' should also be deleted.</li> </ul>		

<b>PC3</b>		
<b>WHSAP Page/Paragraph/Table:</b>	Table 4.1	
<b>Reason for proposed change:</b>	Factual update to table of figures to reflect the latest Housing Land Supply Statement published March 2018 (base date April 2017).	
<b>Proposed change:</b>	Update Table 4.1 (as set out in full at Annex A to the Schedule of Proposed Changes <sup>10</sup> ).	
<b>No. of responses received:</b>	9	
<b>Comment ID No.</b>	<b>Consultee ID</b>	<b>Agent ID</b>
53	841197	397761
132	1138002	1138006
162	1132344	397761
196	1187599	894742
227	1187638	894742
258	900160	900154
370	1187775	894742
439	1187878	1187879
541	1187791	N/A
<b>Summary of comments received:</b>		
<ul style="list-style-type: none"> <li>• Amendments to Table 4.1 show a significant increase to the minimum number of houses to be allocated.</li> <li>• Careful assessment and review is needed to ensure that adequate housing land supply can be demonstrated.</li> <li>• Since the Pre-Submission Draft Plan there have been delays to delivery at Chippenham, Trowbridge and Salisbury, which have counteracted the large permissions granted in the 2017 monitoring year.</li> <li>• There needs to be careful analysis of the ability of permissions granted in the 2017 monitoring year to deliver development at the rates anticipated.</li> <li>• If sites are not coming forward as anticipated in the principal settlements in the North and West Wiltshire HMA, then there is a need for further allocations.</li> <li>• Even when including the proposed allocations in the South Wiltshire HMA housing land supply, there is only five year housing supply until the monitoring year of 2021.</li> <li>• The timely delivery of land in South Wiltshire (Central Car Park, Kings Gate, The Yard, Fugglestone Red, Netherhampton Road) is questioned as insufficient housing is being delivered annually.</li> <li>• The wording in Table 4.1 (“Minimum to be allocated”) should be amended to enable flexibility through use of an “additional buffer” (NPPF para 47). Suggestion of 5% on top of the minimum requirement to the upper end of a range.</li> <li>• For South Wiltshire the target range should be between 1,331 and 1,852 dwellings between 2017 – 2026. Additional land should be allocated.</li> <li>• For North and West Wiltshire the target range should be between 1,109 and</li> </ul>		

<sup>10</sup> Annex A to the Schedule of Proposed Changes, available at <https://cms.wiltshire.gov.uk/documents/s152172/EXAM0145ScheduleofProposedChangesSept2018Part45of46AnnexA.pdf>



2,346 dwellings between 2017 – 2026. Additional land should be allocated.

- For the purposes of Plan-making housing land supply is to be calculated in accordance with the NPPF (2012). However, housing land supply in planning applications is to be considered against the new NPPF (2018). Therefore, as soon as the Plan is adopted the housing land supply will be different to that considered through the examination.
- Object to the removal of proposed allocation at East of Lavington School.
- Support for the proposed increase to the minimum number to be allocated in the South Wiltshire HMA. The proposed increase is justified.

<b>PC4</b>		
<b>WHSAP Page/Paragraph/Table:</b>	Paragraph 4.2	
<b>Reason for proposed change:</b>	To improve clarity.	
<b>Proposed change:</b>	Amend the paragraph to read: “The figures above <b><u>do not include windfall and show a minimum to be allocated that the Plan should aim to allocate</u></b> , but a surplus is necessary to maintain five years supply of housing land in each HMA and to surpass the buffer in excess of five years required by the NPPF.”	
<b>No. of responses received:</b>	4	
<b>Comment ID No.</b>	<b>Consultee ID</b>	<b>Agent ID</b>
<b>52</b>	841197	397761
<b>133</b>	1138002	1138006
<b>163</b>	1132344	397761
<b>259</b>	900160	900154
<b>Summary of comments received:</b>		
<ul style="list-style-type: none"> <li>• Amendments to Table 4.1 show a significant increase to the minimum number of houses to be allocated, especially in the South Wiltshire HMA which has increased by approximately 55%.</li> <li>• There is an over reliance on windfall development in the South Wiltshire HMA.</li> <li>• Amendments to Table 4.1 does not include windfall development.</li> <li>• Object to approach to windfall development which has deviated from approach in the WCS (found sound, but conservative). The WHSAP approach gives higher figure based on greater number of large windfall sites. The differences in both methods used (WCS – Method 1, WHSAP – Method 3 / A) shows windfalls are declining. The WHSAP method is totally reliant on historic trends.</li> <li>• The capacity is reduced for windfalls as these sites will come forward as allocations, therefore the number of windfalls will be below the declining historic trend.</li> <li>• Delete the words ‘aim to’ in order to provide certainty of delivery.</li> </ul>		

<b>PC10</b>		
<b>WHSAP Page/Paragraph/Table:</b>	Paragraph 4.8	
<b>Reason for proposed change:</b>	Factual update to reflect the consideration of new sites.	
<b>Proposed change:</b>	Amend the paragraph to read: “All councils are required to maintain a register of land that has been put forward for development. This is referred to as the Strategic Housing Land Availability Assessment (SHLAA). Within areas of search the SHLAA provides a pool of land opportunities for possible housing development <b><u>Since the publication of the SHLAA other sites have been promoted to the Council through the consultation on the draft Plan, which would be considered through future updates to the SHLAA, now referred to as the Strategic Housing and Employment Land Availability Assessment (SHELAA). Such sites can also be regarded as SHLAA (SHELAA) sites for site assessment purposes.</u></b> ”	
No. of responses received:	1	
<b>Comment ID No.</b>	<b>Consultee ID</b>	<b>Agent ID</b>
32	1183327	N/A
<b>Summary of comments received:</b>		
<ul style="list-style-type: none"> <li>• Agree to amendments to PC10</li> </ul>		

<b>PC13 (Consequential change resulting from PC55, PC70, PC60, PC64 and PC94)</b>			
<b>WHSAP Page/Paragraph/Table:</b>	Table 4.5		
<b>Reason for proposed change:</b>	Update table to show proposed changes to approximate number of dwellings to be allocated at Elm Grove Farm, Trowbridge (see PC55); Upper Studley, Trowbridge (see PC70); Land off the A363 at White Horse Business Park, Trowbridge (see PC60); Elizabeth Way, Trowbridge (see PC64); and Court Orchard / Cassways, Bratton (see PC94).		
<b>Proposed change:</b>	Update housing numbers as follows:		
	Trowbridge	613	Elm Grove Farm
			<del>200</del> <b>250</b>
	Trowbridge	3260	Upper Studley
			<del>20</del> <b>45</b>
	Trowbridge	298	Land off the A363 at White Horse Business Park
			<del>150</del> <b>175</b>
	Trowbridge	297/263	Elizabeth Way
			<del>205</del> <b>355</b>
	Bratton	321	Court Orchard / Cassways
			<del>40</del> <b>35</b>
<b>No. of responses received:</b>	8		
<b>Comment ID No.</b>	<b>Consultee ID</b>	<b>Agent ID</b>	
35	1183327	N/A	
51	841197	397761	
68	402574	N/A	
135	1138002	1138006	
336	1132626	1187757	
430	555472	N/A	
454	903369	443671	
488	1137984	1130975	
<b>Summary of comments received:</b>			
<ul style="list-style-type: none"> <li>• Objection to the increase in number of dwellings at Elizabeth Way. This should be kept at 205 dwellings.</li> <li>• The increase in number of dwellings does not appear to be justified. High density housing is not appropriate for these rural areas. Developments with smaller gardens do not help to support wildlife. These aspects do not appear to have been considered in the allocation of a higher number of dwellings. An increase in dwellings will further exacerbate traffic and air pollution – a problem which does not appear to be considered seriously by the Plan.</li> <li>• Careful analysis of the housing supply figures and examination of the deliverability of these sites is needed, in order to ensure that the new allocation dwelling numbers are robust.</li> <li>• Concern about the deliverability of the sites at Trowbridge, therefore an</li> </ul>			

increase in the number of dwellings, though consistent with the Wiltshire Core Strategy, does not have adequate justification.

- The changes to numbers of dwellings do not adequately address the shortfall over the remaining years of the Plan period at Trowbridge;
- The allocated sites at Trowbridge, as well as the Ashton Park strategic site, have deliverability issues (including being affected by the Bat Mitigation Strategy), which will affect the housing delivery trajectory at Trowbridge;
- The council should, therefore, look to allocate additional sites to meet Trowbridge's housing needs over the remaining years of the Plan period
- EA comments relate to the allocations at Upper Studley (H2.5) and Elizabeth Way (H2.3) having had their housing numbers increased. Therefore, care must be taken to ensure that the amount of Flood Zone 1 on the sites can adequately accommodate the increase in housing.

<b>PC15</b> (Consequential change resulting from PC55, PC60, PC64, PC70, PC94, PC46, PC47, PC48, PC92 and PC111)		
<b>WHSAP Page/Paragraph/Table:</b>	Table 4.7	
<b>Reason for proposed change:</b>	Update to table of figures to reflect the latest housing land supply statement published March 2018 (base date April 2017). This has been updated to reflect amended capacities/ densities on housing allocations at Trowbridge (see PC55, PC60, PC64 and PC70) and at Bratton (see PC94); removal of housing allocations at Market Lavington (see PC46, PC47 and PC48) and Crudwell (see PC92); and addition of a new housing allocation at Salisbury (see PC111).	
<b>Proposed change:</b>	Update Table 4.7 (as set out in full at Annex A to the Schedule of Proposed Changes <sup>11</sup> ).	
<b>No. of responses received:</b>	9	
<b>Comment ID No.</b>	<b>Consultee ID</b>	<b>Agent ID</b>
50	841197	397761
136	1138002	1138006
164	1132344	397761
197	1187599	894742
230	1187638	894742
260	900160	900154
374	1187775	894742
489	1137984	1130975
516	1122879	
<b>Summary of comments received:</b>		
<ul style="list-style-type: none"> <li>• There is over-reliance on windfall delivery.</li> <li>• Objection to the approach taken to calculating windfall delivery which differs from the approach taken in the WCS, and results in a higher figure.</li> <li>• Suggestion that 4% windfall allowance (4% of minimum housing requirement) should be applied. For South Wiltshire windfall should be c.420 dwellings rather than c.740 between 2017 – 2026. For North and West Wiltshire windfall should be c.990 dwellings rather than c.2,210 between 2017 – 2026.</li> <li>• The council are allocating sites, which means that windfall capacity is reduced.</li> <li>• Tightening of settlement boundaries means that opportunities for windfall develop is reduced.</li> <li>• Objection to continued reliance on saved Local Plan allocations as a component of supply, as these sites have not delivered to date.</li> <li>• Careful assessment and review is needed to ensure that adequate housing land supply can be demonstrated.</li> <li>• There are differences between the figures quoted for deliverable housing land supply, between different documents.</li> <li>• There is no up-to-date housing trajectory to support the Focussed Changes.</li> </ul>		

<sup>11</sup> Annex A to the Schedule of Proposed Changes, available at <https://cms.wiltshire.gov.uk/documents/s152172/EXAM0145ScheduleofProposedChangesSept2018Part45of46AnnexA.pdf>

- The council can only demonstrate a deliverable supply of 2,593 homes, which equates to a 4.20 years' land supply rather than the figure of 5.7 years supply as suggested in amendments to Table 4.8 (PC17).
- The timely delivery of allocated land in South Wiltshire and North and West Wiltshire is questioned.
- Additional sites should be allocated as contingency.
- The capacity of 4 allocations at Trowbridge has increased, which suggests the council are 'squeezing' units out of sites. Alternative sites should be allocated instead.
- Object to the proposed change that results in a reduction in site capacity of H2.2.
- The importance of providing housing in rural areas should not be underplayed.

<b>PC16 (Consequential change resulting from PC17.)</b>		
<b>WHSAP Page/Paragraph/Table:</b>	Paragraph 4.32	
<b>Reason for proposed change:</b>	Factual update to reflect the latest published Housing Land Supply Statement (March 2018).	
<b>Proposed change:</b>	Amend paragraph to read: “Housing trajectories are site by site estimates of start and finish dates and annual completions. Aggregating housing trajectories for each HMA shows how the Plan helps to deliver in excess of five years supply of land in each area for the remaining years of the Plan period. The table below provides estimates of how many years supply there will be in each remaining year of the Plan period. It shows that supply exceeds the five-year requirement through to the end of the Plan period for all years except <del>one</del> <b>four</b> in the South Wiltshire HMA and <del>well before</del> <b>by</b> then additional allocations will be included within the review of the WCS.”	
No. of responses received:	6	
<b>Comment ID No.</b>	<b>Consultee ID</b>	<b>Agent ID</b>
<b>165</b>	1132344	397761
<b>198</b>	1187599	894742
<b>225</b>	1187638	894742
<b>261</b>	900160	900154
<b>373</b>	1187775	894742
<b>427</b>	1149598	N/A
<b>Summary of comments received:</b>		
<ul style="list-style-type: none"> <li>• The housing land supply deteriorates by 2019/2020 onwards and is also vulnerable for years 5-14. The Local Plan Review is now delayed and therefore cannot address this housing supply shortfall later in the Plan period. A contingency site should therefore be added.</li> <li>• The Plan does not deliver a wide choice of high quality homes in South Wiltshire or North and West Wiltshire and should not rely on the Local Plan Review to deliver housing towards the end of the Plan period.</li> <li>• More deliverable and developable land should be provided and PC16, PC17 and Annex A should be amended accordingly.</li> <li>• PC16 and 17 are not legally compliant because they do not reflect legislation or national policy and are not in line with Section 6 of the NPPF. They are not positively prepared because they do not provide surety of housing supply. They are not justified because they do not respond to change.</li> <li>• The minimum housing requirement is not a capped target and should not be treated as such in the Plan.</li> <li>• 20% contingency should be provided in the housing land supply.</li> <li>• Alternative sites should be allocated.</li> </ul>		



<b>PC17</b> (Consequential change resulting from PC55, PC60, PC64, PC70, PC94, PC46, PC47, PC48, PC92 and PC111)	
<b>WHSAP Page/Paragraph/Table:</b>	Table 4.8
<b>Reason for proposed change:</b>	Update to table of figures to reflect the latest housing land supply statement published March 2018 (base date April 2017). This has been updated to reflect amended capacities/ densities on housing allocations at Trowbridge (see PC55, PC60, PC64 and PC70) and at Bratton (see PC94); removal of housing allocations at Market Lavington (see PC46, PC47 and PC48) and Crudwell (see PC92); and addition of a new housing allocation at Salisbury (see PC111).
<b>Proposed change:</b>	Update Table 4.8 (as set out in full at Annex A to the Schedule of Proposed Changes <sup>12</sup> ).
<b>No. of responses received:</b>	8

<b>Comment ID No.</b>	<b>Consultee ID</b>	<b>Agent ID</b>
<b>49</b>	841197	397761
<b>137</b>	1138002	1138006
<b>166</b>	1132344	397761
<b>199</b>	1187599	894742
<b>226</b>	1187638	894742
<b>262</b>	900160	900154
<b>372</b>	1187775	894742
<b>490</b>	1137984	1130975

**Summary of comments received:**

- Unclear from Topic Paper 4 what calculations are behind the revised figures in Table 4.8, as no trajectory reflecting the Focussed Changes is available.
- Careful assessment and review is needed to ensure that adequate housing land supply can be demonstrated.
- Once adopted the method for calculating housing land supply will change and therefore the position is not as robust as set out in Topic Paper 4.
- The timely delivery of allocated land in South Wiltshire and North and West Wiltshire is questioned.
- Additional sites should be allocated as contingency.
- To plan positively for housing land supply and meet minimum local housing needs the WCS the WHSAP should allocate sites in the Large Villages.
- The WHSAP should deal upfront with land supply and should not rely on later reviews of the WCS which could take several more years.
- The capacity of 4 allocations at Trowbridge has increased, which suggests the council are 'squeezing' units out of sites. Alternative sites should be allocated instead.
- Object to proposed change that results in reduction in site capacity of H2.2.

<sup>12</sup> Annex A to the Schedule of Proposed Changes, available at <https://cms.wiltshire.gov.uk/documents/s152172/EXAM0145ScheduleofProposedChangesSept2018Part45of46AnnexA.pdf>

<b>PC19 (Consequential change resulting from PC18.)</b>		
<b>WHSAP Page/Paragraph/Table:</b>	Paragraph 4.39	
<b>Reason for proposed change:</b>	Update to reflect the latest published Housing Land Supply Statement (March 2018), to reflect changes to Table 4.9 as set out in PC18.	
<b>Proposed change:</b>	Amend paragraph to read: “The overall pattern of growth is in general conformity with the WCS. It is consistent with the principles of the spatial strategy. Compared to indicative levels, development is focussed slightly more on the Market Towns (+4% <b>+7.2%</b> ) and less on the rural settlements (-8% <b>-10.8%</b> ).	
No. of responses received:	1	
<b>Comment ID No.</b>	<b>Consultee ID</b>	<b>Agent ID</b>
<b>36</b>	1183327	N/A
<b>Summary of comments received:</b>		
<ul style="list-style-type: none"> <li>Growth should be considered in very rural settlements (i.e. Small Villages) to supply housing for young people and retired people wishing to downsize but who wish to remain in their rural environment.</li> </ul>		

<b>PC21</b> (Consequential change resulting from PC55, PC60, PC64, PC70, PC94 and PC92)	
<b>WHSAP Page/Paragraph/Table:</b>	Table 4.10
<b>Reason for proposed change:</b>	Factual update to table of figures to reflect the Latest Housing Land Supply Statement published March 2018 (base date April 2017). This has been updated to reflect amended capacities/ densities on housing allocations at Trowbridge (see PC55, PC60, PC64 and PC70) and at Bratton (see PC94); and removal of housing allocation at Crudwell (see PC92).
<b>Proposed change:</b>	Update Table 4.10 (as set out in full at Annex A to the Schedule of Proposed Changes <sup>13</sup> ).
<b>No. of responses received:</b>	5

<b>Comment ID No.</b>	<b>Consultee ID</b>	<b>Agent ID</b>
<b>138</b>	1138002	1138006
<b>228</b>	1187638	894742
<b>280</b>	1133384	1128217
<b>455</b>	903369	443671
<b>491</b>	1137984	1130975

<b>Summary of comments received:</b>
<ul style="list-style-type: none"> <li>• The proposed change indicates a significant shortfall in supply at Trowbridge (-19%) but hides key information about how big the shortfall is based on the minimum requirements set out in the Wiltshire Core Strategy.</li> <li>• The column headings are misleading.</li> <li>• An additional 5% buffer should be applied, meaning that Trowbridge has a shortfall of between 1,297 and 1,638 new houses from 2018 – 2026.</li> <li>• ‘Minimum to be allocated’ figures should not be seen as a maximum figure. Additional housing on top of the minimum to be allocated would provide additional buffer.</li> <li>• Careful assessment and review is needed to ensure that adequate housing land supply can be demonstrated.</li> <li>• The timely delivery of allocated land in the North and West Wiltshire HMA is questioned.</li> <li>• The strategy for Trowbridge is reliant on the uncertain outcomes of the Trowbridge Bat Mitigation Strategy. There is not enough certainty to the deliverability of the proposed Strategy.</li> <li>• The capacity Trowbridge allocations has increased, which suggests the council are ‘squeezing’ units out of sites.</li> <li>• Alternative/additional sites should be allocated.</li> <li>• The wider Trowbridge Community Area, particularly to the south and east where fewer constraints are present, should provide sites to deliver the flexibility the Plan requires.</li> <li>• Object to proposed change that results in reduction in site capacity of H2.2.</li> </ul>

<sup>13</sup> Annex A to the Schedule of Proposed Changes, available at <https://cms.wiltshire.gov.uk/documents/s152172/EXAM0145ScheduleofProposedChangesSept2018Part45of46AnnexA.pdf>

<b>PC22</b>		
<b>WHSAP Page/Paragraph/Table:</b>	Paragraph 4.45	
<b>Reason for proposed change:</b>	Minor factual amendment to express the degree to which market towns have disproportionately grown in recent years when compared to the Principal Settlements of Trowbridge and Chippenham. This reflects the latest published Housing Land Supply Statement (March 2018).	
<b>Proposed change:</b>	Amend paragraph to read: “There are marked differences in the anticipated growth of <b><i>many of the Market Towns in the HMA (including Calne, <u>Malmesbury, Melksham and Bowerhill</u></i></b> , and Westbury) over the Plan period compared to the two Principal Settlements of the HMA, Chippenham and Trowbridge.”	
No. of responses received:	2	
<b>Comment ID No.</b>	<b>Consultee ID</b>	<b>Agent ID</b>
<b>139</b>	1138002	1138006
<b>492</b>	1137984	1130975
<b>Summary of comments received:</b>		
<ul style="list-style-type: none"> <li>Careful assessment and review is needed to ensure that adequate housing land supply can be demonstrated.</li> <li>Object to the proposed change that results in a reduction in site capacity of H2.2.</li> </ul>		

<b>PC23</b>		
<b>WHSAP Page/Paragraph/Table:</b>	Paragraph 4.47	
<b>Reason for proposed change:</b>	Minor factual amendment for clarity to reflect the fact that Melksham and Bowerhill village are treated as being a single settlement within the Wiltshire Core Strategy for the purposes of planning.	
<b>Proposed change:</b>	Amend paragraph to read: “In contrast, rates of development at most Market Towns have met expectations and at Bradford on Avon, Calne, Malmesbury, Melksham <b><i>and Bowerhill</i></b> , Royal Wootton Bassett and Westbury anticipated levels of growth have been exceeded over the first half of the Plan period. Land has been available and some additional sites granted consent by planning appeals. Over the same interval, scales of development within rural areas in many places have also exceeded those anticipated by the WCS.”	
No. of responses received:	1	
<b>Comment ID No.</b>	<b>Consultee ID</b>	<b>Agent ID</b>
<b>140</b>	1138002	1138006
<b>Summary of comments received:</b>		
<ul style="list-style-type: none"> <li>Careful assessment and review is needed to ensure that adequate housing land supply can be demonstrated.</li> </ul>		

<b>PC24</b>		
<b>WHSAP Page/Paragraph/Table:</b>	Paragraph 4.49	
<b>Reason for proposed change:</b>	Factual update to reflect the latest published Housing Land Supply Statement (March 2018).	
<b>Proposed change:</b>	Amend paragraph to read: “Chippenham <del>however is now likely to exceed</del> <b><u>now has the potential to meet</u></b> the minimum scale of growth anticipated in the WCS by <b><u>delivery of</u></b> higher rates of house building in the last half of the Plan period compared to much lower rates over recent years. This will come about in large part as a result of significant allocations for housing development made in the Chippenham Site Allocations Plan <b><u>as well as other significant permissions at the town.</u></b> ”	
No. of responses received:	1	
<b>Comment ID No.</b>	<b>Consultee ID</b>	<b>Agent ID</b>
<b>141</b>	1138002	1138006
<b>Summary of comments received:</b>		
<ul style="list-style-type: none"> <li>Careful assessment and review is needed to ensure that adequate housing land supply can be demonstrated.</li> </ul>		

<b>PC25 (Consequential change resulting from PC55, PC60, PC64 and PC70)</b>	
<b>WHSAP Page/Paragraph/Table:</b>	Paragraph 4.52
<b>Reason for proposed change:</b>	Factual update to reflect the latest published Housing Land Supply Statement (March 2018) and to reflect PC55, PC60, PC64 and PC70 that propose higher densities on site allocations to make best use of land.
<b>Proposed change:</b>	Amend the paragraph to read: “Unlike Chippenham however, allocations made by the Plan will not be sufficient to ensure that housing provision meets indicative requirements. Six new site allocations provide land for approximately <del>800</del> <b>1,050</b> dwellings and have the potential to increase their capacity to make the best use of land. Nevertheless, housing development at Trowbridge will fall short of the WCS indicative level of 6,810 dwellings by around <del>4,220</del> <b>1,297</b> .”
<b>No. of responses received:</b>	4

<b>Comment ID No.</b>	<b>Consultee ID</b>	<b>Agent ID</b>
<b>330</b>	1132626	1187757
<b>345</b>	1132626	1187757
<b>494</b>	1137984	1130975
<b>530</b>	392036	1126545

**Summary of comments received:**

- Delivery rates predicted for large strategic sites are over-estimated.
- Substantial over-reliance on strategic sites to deliver homes over the remaining years of the Plan period which means that it will fail to deliver the requisite quantum of housing to secure five-year housing land supply position.
- The target requirement set out in the Core Strategy for each community area should be regarded as a minimum figure. Exceeding this figure should not automatically preclude further development within a specific area.
- The figure of approximately 1,050 dwellings to be delivered falls significantly short of the updated indicative minimum requirement of 2,230 dwellings set for Trowbridge over the Plan period by a total of 1,180 dwellings.
- The proposed changes have done nothing to address the indicative housing shortfall anticipated over the remaining years of the Plan period at Trowbridge.
- Questions over the deliverability of the identified allocations at Trowbridge given that there is potential for them to be affected by the same ecological issues that have affected the delivery of Ashton Park.
- Trowbridge is identified in the Core Strategy as a Principal Settlement and focus for significant levels of development. The draft WHSAP fails to meet the objectively assessed development and infrastructure requirements for the town and is therefore unsound.
- Based upon the evidence presented to date, the Plan has not demonstrated it is the most appropriate strategy, when considered against the reasonable alternatives.
- The Plan will not deliver housing in a timely manner in accordance with Wiltshire Core Strategy.

- A key priority of national planning policy is to boost significantly the supply and delivery of housing.
- The Sustainability Assessment does not examine the shortfall of housing within Trowbridge.
- Failure to deliver a full amount of housing at Trowbridge does not match the ambitions of the Town Council who want to maintain Trowbridge's status as Wiltshire's County Town.
- In order to meet the indicative housing requirement for Trowbridge Town, there is a need to allocate more sites at Trowbridge including within the parish of Hilperton. However, even if (contrary to footnote 56) Hilperton is excluded from Trowbridge Town, allocations are still required including those at Hilperton to address the Community Area requirements.
- PC25 highlights a deficit of 1,297 dwellings that would remain to be delivered at the town to meet Core Strategy expectations. The evidence base produced by the council does not appear to reconcile this shortfall and is therefore failing to deliver sufficient housing at the town.
- The Sedgefield method (rather than the Liverpool method) conforms more closely with the requirement to plan positively as it seeks to boost significantly the supply of land for housing in the early part of the Plan period.
- The proposed quantum of 355 dwellings currently associated with allocation H2.3, does not meet the full potential capacity of the site, therefore proving that the Plan is not justified, as it does not make efficient use of land in accordance with the expectation of national planning policy.
- The Plan does not generally propose to make the most efficient use of land through its allocations. This is contrary to national planning policy and inherently unsustainable.
- The site at Elizabeth Way (Allocation H2.3) has the potential to sustainably deliver circa 480 dwellings and hence the quantum to be delivered should be increased.
- The proposed modification is inconsistent with the technical information provided to the council by site owners/developers, and the council's own evidence base documents, with recognise the capability of the Proposed Allocation (H2.2) to accommodate a greater quantum of residential units whilst still maintaining appropriate separation between Trowbridge and North Bradley and providing adequate mitigation.
- The reduction in dwelling numbers for Proposed Allocation H2.2 does not represent positive plan preparation or the best and most efficient use of land.
- There is an identified housing need in the Trowbridge Community Area and the WHSAP as currently proposed does not meet the full indicative housing requirement. It is recognised that mitigation will be required in relation to heritage and ecology matters, however the technical work undertaken by the site promoters has identified that appropriate mitigation can be accommodated with a greater quantum of dwellings than 175 on site H2.2.
- The capacity of the Proposed Allocation H2.2 should be stated as "at least 300 dwellings", and consequential changes subsequently amended.
- Alternative/additional sites should be allocated.



<b>PC26</b>		
<b>WHSAP Page/Paragraph/Table:</b>	Paragraph 4.53	
<b>Reason for proposed change:</b>	Factual update to reflect the latest published Housing Land Supply Statement (March 2018) and PC55, PC60, PC64 and PC70.	
<b>Proposed change:</b>	Amend paragraph to read: “One main reason for a shortfall in land supply is the complexity and consequent delay developing Ashton Park, a south-eastern extension to the town. <del>4,600</del> <b>1,350</b> dwellings will be built on this site in the plan period and a further <del>4,000</del> <b>1,250</b> post-2026; rather than first envisaged that the whole of the allocation would have been completed in the plan period. This <b>broadly equates</b> <del>can be seen to account for 1,000 of the 4,220</del> <b>1,297</b> dwelling shortfall.”	
<b>No. of responses received:</b>	4	
<b>Comment ID No.</b>	<b>Consultee ID</b>	<b>Agent ID</b>
<b>72</b>	402574	N/A
<b>142</b>	1138002	1138006
<b>331</b>	1132626	1187757
<b>531</b>	392036	1126545
<b>Summary of comments received:</b>		
<ul style="list-style-type: none"> <li>• The Ashton Park developers should be encouraged to use modern building techniques which shorten the build time for housing.</li> <li>• Every effort should be made to expedite detailed planning applications for Ashton Park as it appears to be lost in planning negotiations.</li> <li>• The shortfall of provision of units at Ashton Park needs to be addressed with even greater urgency through planned growth that includes a sufficient number of allocations that are capable of delivering the required number of units.</li> <li>• The council may be seeking to address the housing shortfall through ‘squeezing’ units out of its proposed allocation sites.</li> <li>• The quantum of housing development proposed at Trowbridge is falling increasingly short of the indicative requirement and needs to be addressed if the Plan is to succeed.</li> <li>• At this stage of the plan making process Wiltshire Council should be required to establish how the identified housing need can be met over the remaining Plan period. With regards to the Trowbridge Community Area it clearly does not address the identified need set out in the Core Strategy. This proves that the draft proposals have not been consistently prepared using the best available evidence.</li> <li>• Clarification sought on whether it has been agreed by the council’s Estate Department that H2.1 now includes council owned land.</li> <li>• There is a danger that given there are complex issues in relation to the delivery of proposed allocated sites that sites may not realistically contribute towards meeting the housing requirement for Trowbridge.</li> <li>• The council should identify further suitable sites so that they are futureproofing the Plan and delivery of housing.</li> </ul>		

- The evidence base over-estimates the delivery rates at large strategic housing sites. The council is therefore failing to allocate a sufficient number of sites to account for the inevitable shortfall in housing delivery that will result, particularly when assessed against the latest national policy position.
- The evidence base places substantial over-reliance on strategic sites to deliver homes over the remaining years of the Plan period which means that it will fail to deliver the requisite quantum of housing to secure the council's five-year housing land supply position.
- The council are overly optimistic in their assumed delivery trajectories at a number of these proposed strategic sites.
- The indicative housing requirement should be seen as a minimum and exceeding this figure should not automatically preclude further development within any specific area.
- The indicative housing requirement which has been set for Trowbridge has still not been met through the proposed allocations at the town.
- The proposed quantum of 355 dwellings currently associated with allocation H2.3, does not meet the full potential capacity of the site. This therefore proves that the Plan is not justified as it does not make the best and most efficient use of land to be allocated through the Site Allocations Plan.
- The 'Sedgefield method' (rather than the Liverpool method) conforms more closely with the requirement to plan positively, as it seeks to boost significantly the supply of land for housing in the early part of the Plan period.
- In order to maintain a 5-year supply, the council should maximise site capacities, eliminate any small sites which have been built out or expired from the 5-year land supply calculations. In addition, the council must be in a position to demonstrate that the proposed Allocations are deliverable over the remaining Plan period.
- PC25 highlights a deficit of 1,297 dwellings and demonstrates that the Plan is failing to deliver a sufficient land to meet the Core Strategy housing requirement. The council's evidence base appears unable to reconcile this shortfall figure. or provide satisfactory solutions.
- Support of the update to the site boundary ay H2.3 Elizabeth Way.
- The proposed quantum of 355 dwellings at H2.3 currently associated with allocation H2.3, does not meet the full potential capacity of the site.
- H2.3 - Elizabeth Way is supported by a drainage masterplan that will ensure the site is capable of delivering an increased level of housing delivery.
- Ecological work undertaken by the site promoters has been used to inform the Concept Masterplan for site H2.3 and demonstrates that an increased level of housing can be delivered without compromising local ecology.
- The Plan does not propose to make efficient use of land to be allocated, which is unsustainable and not consistent with National Policy.
- Alternative/additional sites should be allocated.

<b>PC27 (Consequential change resulting from PC111.)</b>		
<b>WHSAP Page/Paragraph/Table:</b>	Table 4.11	
<b>Reason for proposed change:</b>	Factual update to table of figures to reflect the latest Housing Land Supply Statement published March 2018 (base date April 2017). This has been updated to reflect the addition of a new housing allocation at Salisbury (see PC111).	
<b>Proposed change:</b>	Update Table 4.11 (as set out in full at Annex A to the Schedule of Proposed Changes <sup>14</sup> ).	
No. of responses received:	4	
<b>Comment ID No.</b>	<b>Consultee ID</b>	<b>Agent ID</b>
167	1132344	397761
202	1187599	894742
263	900160	900154
438	1187878	1187879
<b>Summary of comments received:</b>		
<ul style="list-style-type: none"> <li>• The proposed change indicates shortfalls in supply but hides key information about how big the shortfall is based on the minimum requirement.</li> <li>• The column headings in Table 4.11 are misleading.</li> <li>• An additional 5% buffer should be applied to provide greater certainty in housing supply terms.</li> <li>• The developable commitments should be reduced further to reflect uncertainties of delivery at housing at Central Car Park and Kings Gate.</li> <li>• The overall housing requirement is a minimum, and not a ceiling figure.</li> <li>• Additional sites should be allocated to provide a contingency for housing land supply, particularly if build out rates are delayed.</li> <li>• Support for the figures shown for the indicative requirements in rural areas, which show a shortfall and shows there are housing needs in rural areas that need to be met.</li> </ul>		

<sup>14</sup> Annex A to the Schedule of Proposed Changes, available at <https://cms.wiltshire.gov.uk/documents/s152172/EXAM0145ScheduleofProposedChangesSept2018Part45of46AnnexA.pdf>

<b>PC28</b>		
<b>WHSAP Page/Paragraph/Table:</b>	Paragraph 4.63	
<b>Reason for proposed change:</b>	Factual update to reflect the latest published Housing Land Supply Statement (March 2018).	
<b>Proposed change:</b>	Amend the paragraph to read: "The South Wiltshire HMA has a slightly less generous housing land supply than elsewhere in Wiltshire."	
<b>No. of responses received:</b>	2	
<b>Comment ID No.</b>	<b>Consultee ID</b>	<b>Agent ID</b>
<b>203</b>	1187599	894742
<b>519</b>	1122879	
<b>Summary of comments received:</b>		
<ul style="list-style-type: none"> <li>• The projected housing land supply in the South Wiltshire HMA (i.e. the proposed allocations plus existing commitments) will not be sufficient and there will be a shortfall.</li> <li>• Additional land should be identified in South Wiltshire HMA to improve the 5-year supply of housing beyond 2022.</li> <li>• Existing site H3.6 Clover Lane should be extended.</li> <li>• Distribution of housing numbers should be mindful of the needs of the rural area and rural villages, as well as more urban centres. Rural new housing is of vital importance.</li> </ul>		

<b>PC29</b>		
<b>WHSAP Page/Paragraph/Table:</b>	Paragraph 4.64	
<b>Reason for proposed change:</b>	Factual update to reflect the latest published Housing Land Supply Statement (March 2018).	
<b>Proposed change:</b>	Amend the paragraph to read: “Salisbury is the Principal Settlement within the HMA. It is intended to be the primary focus for development, providing significant levels of jobs and homes. Two site allocations of more than 500 dwellings <b><u>provide a large source of supply</u></b> are important to ensuring there is a surety of supply to the end of the <b><u>Plan</u></b> period <b><u>to ensure</u></b> and that the City achieves the role set out in the spatial strategy: Churchfields <b><u>Fugglestone Red</u></b> and land at Netherhampton Road. The first is a strategic site allocated in the WCS. The latter of these, <b><u>land</u></b> at Netherhampton Road, is an allocation of the Plan.	
No. of responses received:	3	
<b>Comment ID No.</b>	<b>Consultee ID</b>	<b>Agent ID</b>
<b>168</b>	1132344	397761
<b>264</b>	900160	900154
<b>375</b>	1187775	894742
<b>Summary of comments received:</b>		
<ul style="list-style-type: none"> <li>• Object to reliance on housing delivery from the proposed Netherhampton Road allocations during Plan period – major concerns in respect of traffic/congestion, harm to landscape, water supply and overall deliverability. The council has failed to present sufficient evidence that constraints on H3.1 can be overcome within Plan period.</li> <li>• Proposals to allocate 74% of Salisbury’s indicative housing need in one location risks a significant housing shortage in Salisbury due to the complexity associated with implementation.</li> <li>• The council’s anticipated delivery rates for the Fugglestone Red site are unrealistic.</li> <li>• The council is missing an opportunity to bring forward a sustainable housing development predominantly within the settlement boundary at ‘Britford Park and Ride’ for 100 houses.</li> <li>• Alternative/additional sites should be allocated.</li> </ul>		

<b>PC30</b>		
<b>WHSAP Page/Paragraph/Table:</b>	Paragraph 4.66	
<b>Reason for proposed change:</b>	Factual update to reflect the latest published Housing Land Supply Statement (March 2018).	
<b>Proposed change:</b>	Amend paragraph to read: <b><u>“One of the WCS strategic allocations, namely Churchfields, is a strategic mixed-use site that Core Policy 20 of the WCS requires to deliver 1100 dwellings by 2026. To be developed, this site requires substantial employment uses to decant and is now expected to commence later than envisaged and much less land for new housing will be available before <b>beyond the current plan period of 2026.</b> It is a complex regeneration project that will take time to deliver and will require other sites to enable existing businesses to relocate.</u>”</b>	
<b>No. of responses received:</b>	1	
<b>Comment ID No.</b>	<b>Consultee ID</b>	<b>Agent ID</b>
<b>376</b>	1187775	894742
<b>Summary of comments received:</b>		
<ul style="list-style-type: none"> <li>• Objection to PC30 as the council has not adopted sound or realistic build-out rates and failed to allocate enough land in Salisbury over the remaining Plan period.</li> <li>• PC30 confirms the ‘dropping’ of Churchfields from the council’s housing land supply calculations. This is a major change to the evidence base and fundamentally confirms that insufficient land will be brought forward to meet the indicative housing requirements for the City and South Wiltshire HMA.</li> <li>• In part, Fugglestone Red is being put forward as a replacement for the Churchfields site, but both sites are already identified in the Wiltshire Core Strategy and hence the council is working with a flawed evidence base.</li> <li>• Delivering 1,750 houses at Fugglestone Red will take more than 7 years 2018 – 2026. At current rates, the build out will stretch from 2015 – 2032.</li> <li>• PC 31 explains that the Netherhampton Road site H3.1 will not deliver any housing for “several years”.</li> <li>• We do not think it is possible to deliver affordable and market houses for sale at Netherhampton Road by 2020/1 – it is too controversial. 2023 is the earliest date for commencement.</li> <li>• The council’s trajectory for the Netherhampton Road site is overly optimistic and therefore not sound.</li> <li>• Alternative/additional sites should be allocated.</li> </ul>		

<b>PC31</b>		
<b>WHSAP Page/Paragraph/Table:</b>	Paragraph 4.68	
<b>Reason for proposed change:</b>	Factual update to reflect the latest published Housing Land Supply Statement (March 2018).	
<b>Proposed change:</b>	Amend paragraph to read: “Recognising the scale of the site, a generous lead in time is provided for the delivery of Netherhampton Road. The site is not expected to contribute to housing delivery for several years whilst work is carried out to masterplan the site and develop mitigation measures. In the meantime, supply from major schemes such as Fugglestone Red and Longhedge will ensure sufficient supply. Churchfields <b>Fugglestone Red</b> and <b>the</b> Netherhampton Road sites will deliver new homes alongside each other toward the end of the plan period.”	
<b>No. of responses received:</b>	3	
<b>Comment ID No.</b>	<b>Consultee ID</b>	<b>Agent ID</b>
<b>169</b>	1132344	397761
<b>265</b>	900160	900154
<b>377</b>	1187775	894742
<b>Summary of comments received:</b>		
<ul style="list-style-type: none"> <li>• Anticipated housing delivery from Fugglestone Red and Netherhampton Road sites during Plan period is questionable.</li> <li>• PCs 29 and 30 confirm the ‘dropping’ of Churchfields that was to provide 1,100 dwellings between 2017 – 2026 - this is a major change.</li> <li>• Concerned that the sites the council is relying on at Salisbury will not deliver as set out in housing trajectory.</li> <li>• Nathaniel Lichfield and Partners produced a report which illustrates the long lead in times for large sites, on average 3.9 years lead in time for large sites prior to first planning application.</li> <li>• Alternative sites should be allocated.</li> </ul>		

<b>PC32</b>		
<b>WHSAP Page/Paragraph/Table:</b>	Policy H1, Table 5.2; Policy H2, Table 5.3; Policy H.3, Table 5.4	
<b>Reason for proposed change:</b>	Update heading in tables to ensure that the number of dwellings per allocation is referred to in a consistent manner throughout the Plan. Amend text to reflect Table headings in Chapter 4, which refers to 'Approximate dwellings'.	
<b>Proposed change:</b>	Amend title in third column in tables as follows: <del>"No of dwellings"</del> <b><u>"Approximate number of dwellings"</u></b>	
No. of responses received:	2	
<b>Comment ID No.</b>	<b>Consultee ID</b>	<b>Agent ID</b>
<b>134</b>	1138002	1138006
<b>467</b>	983136	N/A
<b>Summary of comments received:</b>		
<ul style="list-style-type: none"> <li>• Support need for flexibility but word 'approximate' should be replaced with 'minimum' as the housing requirement is a minimum.</li> <li>• Persimmon Homes supports the proposed change to "approximate". This is consistent with the rest of the Plan and the underpinning Wiltshire Core Strategy.</li> </ul>		



<b>PC40</b>		
<b>WHSAP Page/Paragraph/Table:</b>	Paragraph 5.21	
<b>Reason for proposed change:</b>	In response to concerns raised by Southern Water to provide clarity on water infrastructure and due to proximity of sewage treatment works.	
<b>Proposed change:</b>	Add text at the end of paragraph: <b><u>“Development will provide a connection to the nearest point of adequate capacity in the sewerage network, as advised by the service provider. Development layout should be informed by an odour assessment, to be undertaken in consultation with Southern Water.”</u></b>	
<b>No. of responses received:</b>	2	
<b>Comment ID No.</b>	<b>Consultee ID</b>	<b>Agent ID</b>
<b>191</b>	390753	N/A
<b>308</b>	758096	758092
<b>Summary of comments received:</b>		
<ul style="list-style-type: none"> <li>• Test Valley Borough Council confirm no objection to the proposed amendments.</li> <li>• The landowner and promoter of H1.1 raise no objections to the proposed change.</li> </ul>		

<b>PC41</b>		
<b>WHSAP Page/Paragraph/Table:</b>	Paragraph 5.19	
<b>Reason for proposed change:</b>	To provide clarity on how timing of access point will be determined.	
<b>Proposed change:</b>	Amend last sentence of paragraph 5.19 to read: "Transport assessment will <b><u>determine the trigger point for the delivery of the access via Simonds Road and</u></b> inform detailed measures to mitigate impacts on the local road network, including the A342 Andover Road, Memorial Junction and the capacity of the signals on the nearby railway bridge.	
<b>No. of responses received:</b>	2	
<b>Comment ID No.</b>	<b>Consultee ID</b>	<b>Agent ID</b>
<b>192</b>	390753	N/A
<b>309</b>	758096	758092
<b>Summary of comments received:</b>		
<ul style="list-style-type: none"> <li>• Test Valley Borough Council confirm no objection to the proposed amendments.</li> <li>• The landowner and promoter of H1.1 raise no objection to the proposed change. The scope for the Transport Assessment is to determine the trigger point for the delivery of the access via Simonds Road. The scheme for the Road Link Land should be submitted at reserved matters. The restriction on occupation of dwellings relative to the trigger is to be secured by means of planning condition.</li> </ul>		

<b>PC42</b>		
<b>WHSAP Page/Paragraph/Table:</b>	Paragraph 5.20	
<b>Reason for proposed change:</b>	Improved clarity. To clarify the position should land for a school not be required.	
<b>Proposed change:</b>	Insert additional text at the end of paragraph 5.20: <b><u>"In the event that land for a school is not required within a period to be agreed with the Council's Education Department, then the land will be returned and thereby revert to agricultural use."</u></b>	
No. of responses received:	2	
<b>Comment ID No.</b>	<b>Consultee ID</b>	<b>Agent ID</b>
<b>193</b>	390753	N/A
<b>310</b>	758096	758092
<b>Summary of comments received:</b>		
<ul style="list-style-type: none"> <li>• Test Valley Borough Council confirm no objection to the proposed amendments.</li> <li>• The landowner and promoter of H1.1 agrees with the clarification in PC42 concerning the delivery of the school land.</li> </ul>		

<b>PC43</b>		
<b>WHSAP Page/Paragraph/Table:</b>	Housing Allocation H1.1	
<b>Reason for proposed change:</b>	Improves context. In response to comment from Natural England to ensure sufficient weight is given to public rights of way.	
<b>Proposed change:</b>	Add fifth bullet point to policy text: <b><u>"the retention and enhancement of public rights of way LUDG1, LUDG2 and LUDG34 through the development of the site."</u></b>	
No. of responses received:	3	
<b>Comment ID No.</b>	<b>Consultee ID</b>	<b>Agent ID</b>
<b>194</b>	390753	N/A
<b>285</b>	408291	N/A
<b>311</b>	758096	758092
<b>Summary of comments received:</b>		
<ul style="list-style-type: none"> <li>• Test Valley Borough Council confirm no objection to the proposed amendments.</li> <li>• Network Rail require that any funds required for necessary rail crossing improvements or rerouting of Berry's Crossing (LUDG1) are provided by the developer, and should be considered within any viability testing for the site, in collaboration with Network Rail.</li> <li>• The landowner and promoter of H1.1 comments that Public Right of Way LUDG34 is not within the extent of the allocation and should be removed from the fifth bullet point. No diversions to LUDG1 are proposed. A partial diversion of LUDG2 is proposed. The wording 'retention and enhancement' is supported.</li> </ul>		

<b>PC44</b>		
<b>WHSAP Page/Paragraph/Table:</b>	Paragraph 5.21	
<b>Reason for proposed change:</b>	Insert additional wording to address concerns raised by the Environment Agency, highlighting the need for flood risk assessment and to address drainage for all development sites.	
<b>Proposed change:</b>	Amend paragraph to read: “The site design will be led by a strong landscape framework. Significant additional screening at the southern and eastern site boundaries would be required, along with landscaping and green infrastructure throughout the site as there are middle and long-distance views of the site from the south. The final design and layout should be informed by a Landscape and Visual Impact Assessment. <b><u>Flood Risk Assessment (incorporating an assessment of the predicted effects of climate change) and comprehensive drainage strategy.</u></b> ”	
No. of responses received:	2	
<b>Comment ID No.</b>	<b>Consultee ID</b>	<b>Agent ID</b>
<b>195</b>	390753	N/A
<b>312</b>	758096	758092
<b>Summary of comments received:</b>		
<ul style="list-style-type: none"> <li>• Test Valley Borough Council confirm no objection to the proposed amendments.</li> <li>• The landowner and promoter of H1.1 raise no objection to the proposed change.</li> </ul>		

<b>PC46</b>		
<b>WHSAP Page/Paragraph/Table:</b>	Housing Allocation H1.2	
<b>Reason for proposed change:</b>	To reflect the resolution of Wiltshire Council's Cabinet, all sites at Market Lavington are proposed to be deleted from the WHSAP. The reason for this is that there is a comfortable five-year housing land supply position in the East HMA such that there is not a strategic need for sites to be allocated through the WHSAP at Market Lavington. Furthermore, significant progress has been made on the preparation of the Market Lavington Neighbourhood Plan, and given the strong five-year supply position in the East HMA, the council can defer the consideration of potential housing allocations at Market Lavington to the emerging neighbourhood plan.	
<b>Proposed change:</b>	Delete section title 'H1.2 Underhill Nursery, Market Lavington'; delete site boundary map at Figure 5.2; delete paragraphs 5.25 to 5.33.	
No. of responses received:	4	
<b>Comment ID No.</b>	<b>Consultee ID</b>	<b>Agent ID</b>
38	1130978	1131263
65	1187002	1187003
82	924012	N/A
466	983136	N/A
<b>Summary of comments received:</b>		
<ul style="list-style-type: none"> <li>• Owners of The Spring site and the Parish Council support the proposed change to allow the consideration of housing allocations to be undertaken through the emerging Market Lavington Neighbourhood Plan (MLNDP).</li> <li>• The reasons given for removal of the site (H1.2) are not sound. The Pre-Submission Draft was previously supportive of the proposed allocation H1.2 at Underhill Nursery. Assessment in the SHLAA and the WHSAP process conclude that the proposed allocation was considered to be suitable, available and deliverable, in a sustainable location with good access to services at Market Lavington. The allocation was supported with technical work by the developer to show that the site was developable and represents a logical development site to meet the housing needs of Market Lavington as a Local Service Centre.</li> <li>• The figure stated in the council's Housing Land Supply Statement Addendum July 2018 [Topic Paper 3] indicates that there is still an indicative requirement of 81 dwellings in the remainder of the Devizes Community Area. Paragraph 47 of NPPF (2012) states that housing sites should be identified to ensure sufficient housing land supply for 5 years and beyond. The Plan is not positively prepared as it fails to meet its identified housing need.</li> <li>• Inconsistent application of methodology: Even though it is correct that the council is able to demonstrate a five-year land supply in the East Wiltshire HMA, the same reason has not been used by the council as justification for not allocating sites in other Community Areas that also have a substantial indicative remaining housing requirement. The proposed removal of sites at</li> </ul>		

Market Lavington is inconsistent with the objective and housing delivery strategy (Objective 3 of the draft WHSAP).

- Inconsistent application of methodology: The council's reasoning for making amendment PC46 due to the progress of the Market Lavington Neighbourhood Plan (MLNDP) conflicts with the information set out in the Devizes Community Area Topic Paper (CATP/06) which states at paragraph 2.13 that a neighbourhood plan is considered to be sufficiently advanced once it has been submitted to the council and contains information on whether it is allocating housing. Table 2.4 of the Devizes CATP establishes that the MLNDP has not yet progressed to the Regulation 16 stage and although it is known that the MLNDP will incorporate housing allocations, there is no mention of the quantum or location of housing. The objector contends the council's position that sufficient progress has been made on the MLNP to allow for the deferral of housing allocations.
- Objection to the proposed change because Neighbourhood Plans cannot be relied on until they have passed examination. Even in areas where plans that are 'well advanced' or made, Wiltshire Council should allocate reserve sites in the event that sites allocated in Neighbourhood Plans prove to be undeliverable.
- The MLNDP cannot be relied on to deliver the remaining housing requirement. The progress to date of the MLNDP has been slow and it is currently only at Regulation 14 stage. In addition, two of the sites allocated in the plan appear to have problems and it is considered that these draft allocations are unlikely to deliver in the way that the neighbourhood plan envisages. Therefore, the Plan is untested and unreliable in terms of its housing allocations.

<b>PC47</b>		
<b>WHSAP Page/Paragraph/Table:</b>	Housing Allocation H1.3	
<b>Reason for proposed change:</b>	To reflect the resolution of Wiltshire Council's Cabinet, all sites at Market Lavington are proposed to be deleted from the WHSAP. The reason for this is that there is a comfortable five-year housing land supply position in the East HMA such that there is not a strategic imperative for sites to be allocated through the WHSAP at Market Lavington. Furthermore, significant progress has been made on the preparation of the Market Lavington Neighbourhood Plan, and given the strong five-year supply position in the East HMA, the council can defer the consideration of potential housing allocations at Market Lavington to the emerging neighbourhood plan.	
<b>Proposed change:</b>	Delete section title 'H1.3 Southcliffe, Market Lavington'; delete site boundary map at Figure 5.3, delete paragraphs 5.34 to 5.35.	
No. of responses received:	2	
<b>Comment ID No.</b>	<b>Consultee ID</b>	<b>Agent ID</b>
66	1187002	1187003
83	924012	N/A
<b>Summary of comments received:</b>		
<ul style="list-style-type: none"> <li>• Owners of The Spring site and the Parish Council support the proposed change to defer the consideration of housing allocations to the emerging neighbourhood plan.</li> </ul>		



<b>PC48</b>		
<b>WHSAP Page/Paragraph/Table:</b>	Housing Allocation H1.4	
<b>Reason for proposed change:</b>	To reflect the resolution of Wiltshire Council's Cabinet, all sites at Market Lavington are proposed to be deleted from the WHSAP. The reason for this is that there is a comfortable five-year housing land supply position in the East HMA such that there is not a strategic imperative for sites to be allocated through the WHSAP at Market Lavington. Furthermore, significant progress has been made on the preparation of the Market Lavington Neighbourhood Plan, and given the strong five-year supply position in the East HMA, the council can defer the consideration of potential housing allocations at Market Lavington to the emerging neighbourhood plan.	
<b>Proposed change:</b>	Delete section titled 'H1.4 East of Lavington School, Market Lavington'; delete site boundary map at Figure 5.4; delete paragraphs 5.36 to 5.37. Renumber subsequent paragraphs.	
No. of responses received:	3	
<b>Comment ID No.</b>	<b>Consultee ID</b>	<b>Agent ID</b>
67	1187002	1187003
84	924012	N/A
542	1187791	N/A
<b>Summary of comments received:</b>		
<ul style="list-style-type: none"> <li>• Owners of The Spring site and the Parish Council support the proposed change to defer the consideration of housing allocations to the emerging neighbourhood plan.</li> <li>• Objection to the removal of the Lavington School (H1.4) allocation from the draft Plan, as it has been identified for development through the Market Lavington Neighbourhood Plan and the Pre-Submission draft of the WHSAP concluded that the site was suitable for housing development.</li> </ul>		

<b>PC51</b> (Consequential change resulting from PC55, PC70, PC60, PC64, PC94, PC92 and PC93)																															
<b>WHSAP Page/Paragraph/Table:</b>	Policy H2, Table 5.3																														
<b>Reason for proposed change:</b>	Updates to reflect amendments to housing site capacities/ densities of allocations at Trowbridge (see PC55, PC60, PC64 and PC70) and at Bratton (see PC94); removal of housing allocation at Crudwell (see PC92); and consequential site reference number amendment (see PC93).																														
<b>Proposed change:</b>	<table border="1"> <thead> <tr> <th>Community Area</th> <th>Ref</th> <th>Site Name</th> <th>No. of dwellings</th> </tr> </thead> <tbody> <tr> <td><b>Trowbridge</b></td> <td>H2.1</td> <td>Elm Grove Farm, Trowbridge</td> <td><del>200</del> <b>250</b></td> </tr> <tr> <td><b>Trowbridge</b></td> <td>H2.2</td> <td>Land off the A363 at White Horse Business Park, Trowbridge</td> <td><del>150</del> <b>225</b> <b>175</b></td> </tr> <tr> <td><b>Trowbridge</b></td> <td>H2.3</td> <td>Elizabeth Way, Trowbridge</td> <td><del>205</del> <b>355</b></td> </tr> <tr> <td><b>Trowbridge</b></td> <td>H2.5</td> <td>Upper Studley, Trowbridge</td> <td><del>20</del> <b>45</b></td> </tr> <tr> <td><b>Malmesbury</b></td> <td>H2.13</td> <td>Ridgeway Farm, Crudwell</td> <td>50</td> </tr> <tr> <td><b>Westbury</b></td> <td><del>H2.14</del> <b>H2.13</b></td> <td>Off B3089 adj. to Court Orchard / Cassways, Bratton</td> <td><del>40</del> <b>35</b></td> </tr> </tbody> </table>			Community Area	Ref	Site Name	No. of dwellings	<b>Trowbridge</b>	H2.1	Elm Grove Farm, Trowbridge	<del>200</del> <b>250</b>	<b>Trowbridge</b>	H2.2	Land off the A363 at White Horse Business Park, Trowbridge	<del>150</del> <b>225</b> <b>175</b>	<b>Trowbridge</b>	H2.3	Elizabeth Way, Trowbridge	<del>205</del> <b>355</b>	<b>Trowbridge</b>	H2.5	Upper Studley, Trowbridge	<del>20</del> <b>45</b>	<b>Malmesbury</b>	H2.13	Ridgeway Farm, Crudwell	50	<b>Westbury</b>	<del>H2.14</del> <b>H2.13</b>	Off B3089 adj. to Court Orchard / Cassways, Bratton	<del>40</del> <b>35</b>
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<b>No. of responses received:</b>	7																														

Comment ID No.	Consultee ID	Agent ID
48	841197	397761
69	402574	N/A
180	391073	N/A
346	1132626	1187757
378	1187638	894742
431	555472	N/A
537	1137984	1130975

<b>Summary of comments received:</b>
<ul style="list-style-type: none"> <li>• The site owners of “Land off the A363 at White Horse Business Park” (H2.2) object to the decrease the number of dwellings proposed at the site, as it is unjustified and instead should be increased to “at least 300 dwellings” to reflect the site’s capacity, the technical evidence and the shortfall at Trowbridge. (See also comments in relation to PC59 and PC60).</li> <li>• Concern about the deliverability of the sites at Trowbridge, therefore an increase in the number of dwellings, though consistent with the Wiltshire Core Strategy, does not have adequate justification.             <ul style="list-style-type: none"> <li>○ The changes to the proposed numbers of dwellings do not adequately address the shortfall over the remaining years of the Plan period at Trowbridge;</li> <li>○ The allocated sites at Trowbridge, as well as the Ashton Park strategic site, have deliverability issues (including being affected by the Bat Mitigation Strategy), which will affect the housing delivery trajectory at Trowbridge.</li> </ul> </li> </ul>

- The council should, therefore, look to allocate additional sites to meet Trowbridge's housing needs over the remaining years of the Plan period.
- Trowbridge Town Council remains opposed to the allocations at Southwick Court (H2.6), Elizabeth Way (H2.3) and Upper Studley (H2.5) and objects to the increased housing numbers at H2.3 and H2.5 because open countryside between Trowbridge and the surrounding villages should be maintained as per Wiltshire Core Strategy paragraph 5.150 and that the proposed 'strategic buffer' now proposed by PC60 will fail to maintain open countryside and is therefore unsound.
- The increase in number of dwellings does not appear to be justified. High density housing is not appropriate for these rural areas. Developments with smaller gardens do not help to support wildlife. These aspects do not appear to have been considered in the allocation of a higher number of dwellings. An increase in dwellings will further exacerbate traffic and air pollution – a problem which does not appear to be considered seriously by the Plan.
- Environment Agency comments relating to the allocations at Upper Studley (H2.5) and Elizabeth Way (H2.3) having had their housing numbers increased. EA previously specified that any housing on these sites must be kept within Flood Zone 1. Therefore, care must be taken to ensure that the amount of Flood Zone 1 on the sites can adequately accommodate the increase in housing.

<b>PC54 (Consequential change resulting from PC53.)</b>		
<b>WHSAP Page/Paragraph/Table:</b>	Housing Allocation H2.1, Figure 5.5, Paragraph 5.46	
<b>Reason for proposed change:</b>	To amend site boundary and include adjoining land within the council's ownership, but in trust by the National Playing Fields Association (operating as Fields in Trust charity), to allow for the relocation of the primary school on this land and enhanced community recreational facilities as part of the wider development. The extended site will enable the delivery of the school early in the site's development consistent with the strategic priority identified in PC53.	
<b>Proposed change:</b>	Amend the boundary of the allocation as set out in <b>Annex B</b> ; And first sentence of Housing Allocation H2.1 and paragraph 5.46 to read: "Approximately <del>44.33</del> <b>17.78</b> ha of land at Elm Grove Farm..."	
<b>No. of responses received:</b>	3 (including petition listing 348 signatures)	
<b>Comment ID No.</b>	<b>Consultee ID</b>	<b>Agent ID</b>
<b>88</b>	901939	901806
<b>347</b>	1132626	1187757
<b>548</b>	1187736	N/A
<b>Summary of comments received:</b>		
<ul style="list-style-type: none"> <li>• Petition to fight against the proposals for the Queen Elizabeth II Field. [A total of 348 signatures have been collected].</li> <li>• The loss of our only green area, for children to play, people exercising and dog walkers to use.</li> <li>• The field became part of a legacy, after the London Olympics. It has been a recreational area for the past 30 years.</li> <li>• Increased traffic on Wiltshire Drive. At least 12 recorded accidents in recent years</li> <li>• Large lorries entering the field from Wiltshire Drive, during the adjacent housing development, prior to a school being built.</li> <li>• Do we need a new school? Schools are included in plans for the Yarnbrook to Hilperton development.</li> <li>• Proposed allocation site area has increased from 17.78ha to 17.85ha, as has the projected number of houses without any justified reasoning.</li> <li>• There would appear to be no justifiable reason for delivering a new Primary School. There are sufficient spaces in local Primary Schools.</li> <li>• Development on the Queen Elizabeth II Playing Field ('Elm Grove Field') would result in the loss of open space play provision for the local community. The land and play equipment should be improved, not built on.</li> <li>• Concerns over the increased traffic congestion on Wiltshire Drive associated with school children being dropped off/picked up.</li> <li>• Concerns over the suitability of Wiltshire Drive to accommodate construction traffic.</li> <li>• H2.1 is supported in principle following a collaborative approach that has been undertaken between the site owners and Wiltshire Council.</li> <li>• An updated masterplan has been formulated which demonstrates that the site can deliver c.254 homes and a 2FE primary school and associated</li> </ul>		

infrastructure.

- Subject to the grant of outline planning permission in 2019, and subsequent approval of reserved matters, the infrastructure and housing elements of the proposed allocation will be capable of being fully delivered by the end of 2023.
- Coulston Estates are willing to participate in the preparation of a Statement of Common Ground in advance of the forthcoming Examination.
- The proposed modifications do not make any fundamental changes to the plan or strategy for Trowbridge.
- The proposed changes do not address the shortfall anticipated over the remaining years of the Plan period at Trowbridge.
- As a key strategic settlement and the primary focus of development, it is not clear how under delivery at Trowbridge can meet the spatial strategy and development requirements of Wiltshire.
- There is a need for Trowbridge to deliver housing in the short term to relieve pressure on other, less sustainable locations for development across the district.
- The delivery of housing at Trowbridge continues to rely on the delivery of housing at Ashton Park where anticipated delivery trajectories are overly optimistic and therefore unsound.
- There remain serious questions over the deliverability of the identified allocations at Trowbridge given that there is potential for them to be affected by same ecological issues that have affected Ashton Park.
- The Plan simply continues to postpone the delivery of housing at Trowbridge until after the Plan period which is an unacceptable approach.
- The council should allocate additional sites at Trowbridge.
- The Plan continues to fail when assessed against the four tests of soundness.

<b>PC55 (Consequential change resulting from PC53 and PC54.)</b>		
<b>WHSAP Page/Paragraph/Table:</b>	Policy H2, Housing Allocation H2.1, Paragraph 5.46	
<b>Reason for proposed change:</b>	To reflect the increase in site area consistent with PC54 and clarify the requirements for the use of the land, and associated provision of open space facilities. The increased site area has allowed for an uplift in housing numbers maximising the efficient use of land.	
<b>Proposed change:</b>	<p>Amend Policy H2 to replace 200 dwellings in Table 5.3 for Elm Grove Farm with 250 dwellings, and first sentence of paragraph 5.46.</p> <p>Amend first bullet point of Housing Allocation H2.1 to read:</p> <ul style="list-style-type: none"> <li>• “Approximately <del>200</del> <b>250</b> dwellings”</li> </ul> <p>Amend 2<sup>nd</sup> bullet point of Housing Allocation H2.1 to read:</p> <ul style="list-style-type: none"> <li>• “At least 1.8ha of land for a two-form entry primary school along with playing pitches <u><b>on land owned by the Council, but held in Trust (the existing Queen Elizabeth II Field).</b></u>”</li> </ul> <p>Amend 4th bullet point of Policy 2.1 to read:</p> <ul style="list-style-type: none"> <li>• “A <u><b>significantly improved and</b></u> consolidated public open space area incorporating and augmenting <u><b>adjacent to</b></u> the existing Queen Elizabeth II Field <u><b>to provide a play area and junior level sports pitches for local community teams to utilise;</b></u>”</li> </ul>	
No. of responses received:	5 (including petition listing 348 signatures)	
<b>Comment ID No.</b>	<b>Consultee ID</b>	<b>Agent ID</b>
<b>89</b>	901939	901806
<b>143</b>	1138002	1138006
<b>181</b>	391073	N/A
<b>348</b>	1132626	1187757
<b>549</b>	1187736	N/A
<b>Summary of comments received:</b>		
<ul style="list-style-type: none"> <li>• Petition to fight against the proposals for the Queen Elizabeth II Field. [A total of 348 signatures have been collected].</li> <li>• The loss of our only green area, for children to play, people exercising and dog walkers to use.</li> <li>• The field became part of a legacy, after the London Olympics. It has been a recreational area for the past 30 years.</li> <li>• Increased traffic on Wiltshire Drive. At least 12 recorded accidents in recent years</li> <li>• Large lorries entering the field from Wiltshire Drive, during the adjacent housing development, prior to a school being built.</li> <li>• Do we need a new school? Schools are included in plans for the Yarnbrook to Hilperton development.</li> </ul>		

- Proposed allocation site area has increased from 17.78ha to 17.85ha, as has the projected number of houses without any justified reasoning.
- There would appear to be no justifiable reason for delivering a new Primary School. There are sufficient spaces in local Primary Schools.
- Development on the Queen Elizabeth II Playing Field ('Elm Grove Field') would result in the loss of open space play provision for the local community. The land and play equipment should be improved, not built on.
- Concerns over the increased traffic congestion on Wiltshire Drive associated with school children being dropped off/picked up.
- Concerns over the suitability of Wiltshire Drive to accommodate construction traffic.
- H2.1 is supported in principle following a collaborative approach that has been undertaken between the site owners and Wiltshire Council.
- An updated masterplan has been formulated which demonstrates that the site can deliver c.254 homes and a 2FE primary school and associated infrastructure.
- Subject to the grant of outline planning permission in 2019, and subsequent approval of reserved matters, the infrastructure and housing elements of the proposed allocation will be capable of being fully delivered by end of 2023.
- Coulston Estates are willing to participate in the preparation of a Statement of Common Ground in advance of the forthcoming Examination.
- The capacity of four of the allocations has increased by 200 units which, in its own right, is not unacceptable.
- The increase in housing numbers suggests the council is seeking to address indicative shortfall at the town through 'squeezing' units out of sites.
- H2.1 now includes council owned land. Clarification on whether this has been agreed by the council's Estate Dept. or relevant Dept. is advised.
- All Trowbridge site allocations have complexities in relation to the delivery and they may not realistically contribute towards meeting the housing requirement for Trowbridge.
- The proposed modifications do not make any fundamental changes to the Plan or strategy for Trowbridge.
- The proposed changes do not address the shortfall anticipated over the remaining years of the Plan period at Trowbridge.
- As a key strategic settlement and the primary focus of development, it is not clear how under delivery at Trowbridge can meet the spatial strategy and development requirements of Wiltshire.
- There is a need for Trowbridge to deliver housing in the short term to relieve pressure on other, less sustainable locations across the district.
- Delivery of housing at Trowbridge relies on the delivery of housing at Ashton Park where anticipated delivery trajectories are overly optimistic.
- There remain serious questions over the deliverability of the identified allocations at Trowbridge given that there is potential for them to be affected by same ecological issues that have affected Ashton Park.
- The Plan continues to postpone the delivery of housing at Trowbridge until after the Plan period which is an unacceptable approach.
- The council should allocate additional sites at Trowbridge.
- The Plan continues to fail when assessed against the four tests of soundness.

<b>PC56</b>		
<b>WHSAP Page/Paragraph/Table:</b>	Housing Allocation H2.1 6th bullet	
<b>Reason for proposed change:</b>	Factual update to reflect the need for cycling and walking routes to integrate with the adjoining employment area.	
<b>Proposed change:</b>	Amend the 6th bullet point to read: <ul style="list-style-type: none"> <li>• "New cycling and walking routes through the site to link into the existing network and the proposed Ashton Park Strategic Allocation site, <b><u>and the White Horse Business Park.</u></b>"</li> </ul>	
No. of responses received:	3	
<b>Comment ID No.</b>	<b>Consultee ID</b>	<b>Agent ID</b>
<b>90</b>	901939	901806
<b>144</b>	1138002	1138006
<b>349</b>	1132626	1187757
<b>Summary of comments received:</b>		
<ul style="list-style-type: none"> <li>• Proposed allocation site area has increased from 17.78ha to 17.85ha.</li> <li>• H2.1 is supported in principle following a collaborative approach that has been undertaken between the site owners and Wiltshire Council.</li> <li>• An updated masterplan has been formulated which demonstrates that the site can deliver c.254 homes and a 2FE primary school and associated infrastructure.</li> <li>• Subject to the grant of outline planning permission in 2019, and subsequent approval of reserved matters, the infrastructure and housing elements of the proposed allocation will be capable of being fully delivered by end of 2023.</li> <li>• Coulston Estates are willing to participate in the preparation of a Statement of Common Ground in advance of the forthcoming Examination.</li> <li>• The capacity of four of the allocations has increased by 200 units which, in its own right, is not unacceptable.</li> <li>• The increase in numbers suggests that the council may be seeking to address the shortfall through 'squeezing' units out of sites.</li> <li>• H2.1 now includes council owned land (Elm Grove Field). Clarification on whether this has been agreed by the council's Estate Department is advised.</li> <li>• All Trowbridge site allocations have complexities in relation to the delivery and they may not realistically contribute towards meeting the housing requirement for Trowbridge.</li> <li>• The proposed modifications do not make any fundamental changes to the Plan or strategy for Trowbridge.</li> <li>• The proposed changes do not address the housing shortfall anticipated over the remaining years of the Plan period at Trowbridge.</li> <li>• As a key strategic settlement and the primary focus of development, it is not clear how under delivery at Trowbridge can meet the spatial strategy and development requirements of Wiltshire.</li> <li>• There is a need for Trowbridge to deliver housing in the short term to relieve pressure on other, less sustainable locations for development.</li> <li>• The delivery of housing at Trowbridge continues to rely on the delivery of housing at Ashton Park where anticipated delivery trajectories are overly optimistic.</li> <li>• There remain serious questions over the deliverability of the identified allocations at Trowbridge given that there is potential for them to be affected</li> </ul>		



by same ecological issues that have affected Ashton Park.

- The Plan simply continues to postpone the delivery of housing at Trowbridge until after the Plan period which is an unacceptable approach.
- The council should allocate additional sites at Trowbridge.
- The Plan continues to fail when assessed against the four tests of soundness.

<b>PC57</b>		
<b>WHSAP Page/Paragraph/Table:</b>	Paragraph 5.47	
<b>Reason for proposed change:</b>	Improve clarity.	
<b>Proposed change:</b>	Insert additional text at the start of paragraph 5.47: <u><b>“Proposals to develop the site will need to be supported by a Flood Risk Assessment (incorporating an assessment of the predicted effects of climate change) and comprehensive drainage strategy.”</b></u>	
<b>No. of responses received:</b>	3	
<b>Comment ID No.</b>	<b>Consultee ID</b>	<b>Agent ID</b>
<b>91</b>	901939	901806
<b>145</b>	1138002	1138006
<b>350</b>	1132626	1187757
<b>Summary of comments received:</b>		
<ul style="list-style-type: none"> <li>• The site owner of H2.1 is committed to continue to work proactively with the council to ensure the delivery of this site.</li> <li>• Concern about the deliverability of the sites at Trowbridge, therefore an increase in the number of dwellings, though consistent with the Wiltshire Core Strategy, does not have adequate justification.             <ul style="list-style-type: none"> <li>○ The changes to numbers of dwellings on the proposed sites at Trowbridge do not adequately address the projected housing shortfall over the remaining years of the Plan period at Trowbridge;</li> <li>○ The allocated sites at Trowbridge, as well as the Ashton Park strategic site, have deliverability issues (including being affected by the Bat Mitigation Strategy), which will affect the housing delivery trajectory at Trowbridge;</li> <li>○ The council should look to allocate additional sites to meet Trowbridge's housing needs over the remaining years of the Plan period.</li> </ul> </li> </ul>		

<b>PC58</b>		
<b>WHSAP Page/Paragraph/Table:</b>	Paragraph 5.50	
<b>Reason for proposed change:</b>	In response to comments from Heritage England to ensure the setting of assets is considered and to recognise in accordance with national policy, further detailed assessments of heritage would likely be required to guide layout and design at the planning application stage.	
<b>Proposed change:</b>	Amend paragraph to read: “Access to the site would need to be holistically planned with upgrades required to Drynham Lane, along with the construction of a connection to the A363 designed as a through-route anticipating future traffic growth. New and improved walking and cycling routes to existing and planned local services would encourage future residents to use sustainable forms of transport. The site has a medium potential for archaeological remains. Therefore any subsequent planning application should be informed by an archaeological assessment. In addition, development will need to minimise the potential to harm the significance of the Grade II Listed Drynham Lane Farmhouse <b><u>and, where appropriate, its setting.</u></b> Measures may also be necessary to prevent potential noise pollution from the existing main road and railway. These considerations should be addressed through the process of detailed design and layout which should be informed through a Heritage Impact Assessment. <b><u>by detailed assessments (including heritage) to support any subsequent planning application.</u></b> ”	
<b>No. of responses received:</b>	2	
<b>Comment ID No.</b>	<b>Consultee ID</b>	<b>Agent ID</b>
146	1138002	1138006
351	1132626	1187757
<b>Summary of comments received:</b>		
<ul style="list-style-type: none"> <li>• Concern about the deliverability of the sites at Trowbridge, therefore an increase in the number of dwellings on sites, including H2.1, though consistent with the Wiltshire Core Strategy, does not have adequate justification.                         <ul style="list-style-type: none"> <li>○ The changes to numbers of dwellings do not adequately address the shortfall over the remaining years of the Plan period at Trowbridge;</li> <li>○ The allocated sites at Trowbridge, as well as the Ashton Park strategic site, have deliverability issues (including being affected by the Bat Mitigation Strategy), which will affect the housing delivery trajectory at Trowbridge;</li> <li>○ The council should, therefore, look to allocate additional sites to meet Trowbridge’s housing needs over the remaining years of the Plan period.</li> </ul> </li> </ul>		

<b>PC59</b>	
<b>WHSAP Page/Paragraph/Table:</b>	Figure 5.6 Paragraph 5.52
<b>Reason for proposed change:</b>	Factual update. Amend site boundary to reflect land ownership and also to exclude site that has now been developed.
<b>Proposed change:</b>	Amend the boundary of the allocation as set out in <b>Annex C</b> ; And first sentence of paragraph 5.52 to read: "Approximately <del>25.62</del> <b>18.96</b> ha of land off the A363 south- west of the White Horse Business Park is allocated for the development...."
<b>No. of responses received:</b>	3

<b>Comment ID No.</b>	<b>Consultee ID</b>	<b>Agent ID</b>
<b>147</b>	1138002	1138006
<b>352</b>	1132626	1187757
<b>493</b>	1137984	1130975

**Summary of comments received:**

- There is a need to allocate sufficient land in the right places in and around Trowbridge.
- There have been delays in delivery at Principal Settlements including Trowbridge. This reiterates the need to identify sufficient land that is actually going to deliver the minimum amount of homes needed for the town.
- Uncertainty around delivery of Ashton Park is having a significant impact on the delivery of housing at Trowbridge.
- The increase in projected housing numbers at sites in Trowbridge suggests that the council may be seeking to address the shortfall through 'squeezing' units out of sites.
- With the complexities in relation to the delivery of Trowbridge sites they may not realistically contribute towards meeting the housing requirement for Trowbridge. The council should identify further suitable sites so that they can future-proof the Plan.
- The proposed modifications do not make any fundamental changes to the Plan or strategy for Trowbridge.
- The proposed changes do not address the shortfall anticipated over the remaining years of the Plan period at Trowbridge.
- As a key strategic settlement and the primary focus of development, it is not clear how under delivery at Trowbridge can meet the spatial strategy and development requirements of Wiltshire.
- There is a need for Trowbridge to deliver housing in the short term to relieve pressure on other, less sustainable locations for development across the district.
- The delivery of housing at Trowbridge continues to rely on the delivery of housing at Ashton Park where anticipated delivery trajectories are overly optimistic.
- There remain serious questions over the deliverability of the identified allocations at Trowbridge given that there is potential for them to be affected by same ecological issues (bats) that have affected Ashton Park.
- The Plan continues to postpone the delivery of housing at Trowbridge until after the Plan period which is an unacceptable approach.
- The council should allocate additional sites at Trowbridge.

- The Plan continues to fail when assessed against the four tests of soundness.
- Castlewood's interests relate to an 8.37ha parcel at the northern end of the proposed site allocation.
- Site H2.2 can deliver at least 300 dwellings of which around 140 could be delivered on the northern part of the site.
- Delivery of approximately 300 dwellings on the entire proposed allocation would not lead to unacceptable coalescence between Trowbridge and North Bradley and loss of open countryside.
- Development on the site would be sensitively designed with the incorporation of new or strengthened landscape buffers and careful siting of built form to protect visual separation between the two settlements. Utilising the approach set out in the Vision Document, the site could accommodate circa 140 units, as part of a wider 300-unit allocation.

<b>PC60</b>		
<b>WHSAP Page/Paragraph/Table:</b>	Policy H2, Table 5.3; Paragraph 5.52	
<b>Reason for proposed change:</b>	To reflect the resolution of Wiltshire Council's Cabinet, the capacity of allocation H2.2 is proposed to be amended. It was previously proposed through a schedule of proposed changes put before May Cabinet <sup>2</sup> that the site capacity should be increased from 150 dwellings to 225 dwellings in order to maximise efficient use of land whilst protecting heritage and ecological interests. However, as a result of subsequent further consultation it was resolved by Cabinet in July 2018 that the figure of 225 should be reduced by 50 dwellings, to 175. This would better enable the provision of a strategic landscape buffer between Trowbridge and the village of North Bradley.	
<b>Proposed change:</b>	Amend first sentence of paragraph 5.52 as follows: "...land off the A363 south-west of the White Horse Business Park is allocated for the development of approximately <del>150</del> <b>225 175</b> dwellings, as identified on the Policies Map."	
<b>No. of responses received:</b>	6	
<b>Comment ID No.</b>	<b>Consultee ID</b>	<b>Agent ID</b>
<b>70</b>	402574	N/A
<b>119</b>	391306	N/A
<b>148</b>	1138002	1138006
<b>182</b>	391073	N/A
<b>353</b>	1132626	1187757
<b>487</b>	1137984	1130975
<b>Summary of comments received:</b>		
<ul style="list-style-type: none"> <li>• Whereas high density developments may be acceptable and expected in the centre of a town, surely lower densities should be employed with most developments in rural areas.</li> <li>• North Bradley Parish Council acknowledges the change in respect of the Strategic Site H 2.2 'Land off A363 at White Horse Business Park' following submissions on behalf of the Parish Council.</li> <li>• While the Parish Council would prefer that this site is not developed, it does not wish to impede the delivery of a strategic site and recognises the need to avoid conflict between higher level plans and the emerging Neighbourhood Development Plan. On this basis only, North Bradley Parish Council supports the allocation of all the proposed strategic sites ('Elm Grove Farm' H2.1), 'Southwick Court' (H2.6) and 'Land off the A363 at White Horse Business Park' (H2.2).</li> <li>• The reduced quantum of development on H.2.2 does not take account of the work already done by the Neighbourhood Plan team and it is necessary to add more detail to the policy text. There should be greater co-ordination between Wiltshire Council and the Neighbourhood Planning steering group.</li> <li>• All Trowbridge site allocations have complexities in relation to the delivery and they may not realistically contribute towards meeting the housing requirement for Trowbridge.</li> </ul>		

- Trowbridge Town Council does not support H2.2 which is contrary to the Wiltshire Core Strategy.
- Open countryside should be maintained and the Town Council contends that the now proposed '*strategic landscape buffer between Trowbridge and the village of North Bradley*' (PC60) will fail to maintain open countryside and is therefore unsound.
- The proposed modifications do not make any fundamental changes to the Plan or strategy for Trowbridge.
- The proposed changes do not address the shortfall anticipated over the remaining years of the Plan period at Trowbridge.
- As a key strategic settlement and the primary focus of development, it is not clear how under delivery at Trowbridge can meet the spatial strategy and development requirements of Wiltshire.
- There is a need for Trowbridge to deliver housing in the short term to relieve pressure on other, less sustainable locations for development across the district.
- The delivery of housing at Trowbridge continues to rely on the delivery of housing at Ashton Park where anticipated delivery trajectories are overly optimistic.
- There remain serious questions over the deliverability of the identified allocations at Trowbridge given that there is potential for them to be affected by same ecological issues that have affected Ashton Park.
- The Plan continues to postpone the delivery of housing at Trowbridge until after the Plan period which is an unacceptable approach.
- The council should allocate additional sites at Trowbridge.
- The Plan continues to fail when assessed against the four tests of soundness
- Castlewood's interests relate to an 8.37ha parcel at the northern end of the site allocation H2.2.
- H2.2 can deliver at least 300 dwellings of which around 140 could be delivered on the northern part of the site.
- Delivery of approximately 300 dwellings on H2.2 would not lead to unacceptable coalescence between Trowbridge and North Bradley.
- Development on the site would be sensitively designed with the incorporation of new or strengthened landscape buffers and careful siting of built form to protect visual separation between the two settlements. Utilising the approach set out in the Vision Document, the site could accommodate c. 140 units, as part of a wider 300-unit allocation.

<b>PC61</b>		
<b>WHSAP Page/Paragraph/Table:</b>	New para after 5.56	
<b>Reason for proposed change:</b>	In response to comments from Heritage England. To reflect the Heritage Impact Assessment undertaken by the Council and ensure appropriate consideration is given to heritage assets and their settings consistent with national policy.	
<b>Proposed change:</b>	Insert new paragraph after paragraph 5.56 to read: <u><b>“As identified in the Council’s Heritage Impact Assessment, the site is an historic agricultural landscape and comprises a cluster of historic farmsteads where the farm houses and ancillary buildings may be susceptible to setting change. This includes Kings Farmhouse (Grade II listed), Willow Grove (Grade II listed), Little Common Farm (non-designated asset), Manor Farmhouse (Grade 2 listed) and Woodmarsh Farm (non-designated asset). An area of the site also includes a Baptist cemetery with an ornamental gateway structure (Grade II listed) and curtilage listed perimeter walls. The archaeological potential of the site is likely to be high. At the planning application stage, the layout and design of the site would need to give great weight to conserving the significance of these heritage assets and their setting in order to minimise harm.”</b></u>	
<b>No. of responses received:</b>	4	
<b>Comment ID No.</b>	<b>Consultee ID</b>	<b>Agent ID</b>
73	402574	N/A
149	1138002	1138006
186	403792	N/A
354	1132626	1187757
<b>Summary of comments received:</b>		
<ul style="list-style-type: none"> <li>• This Proposed Change is indicative of insufficient care in allocating this area for housing in the first place.</li> <li>• The delivery of these sites could be impacted upon as there are significant constraints relating to drainage and heritage assets in particular. We note that the council has addressed these matters through the submission of evidence to support the allocations. Do not question any of the information put forward in the Proposed Change, which relates to the provision of development in the North &amp; West Wiltshire HMA and Trowbridge, except in the identification of the components of supply as those figures impact upon the amount of land that is to be allocated. In that regard, this and other modifications do not overcome our concerns regarding the ability of the identified sites to meet the housing requirement. The strategy is not effective, as there are reasonable alternatives that can deliver, and has not been properly justified. Our objection to the submitted Plan remains.</li> <li>• Historic England note the Proposed Change, which seeks to ensure due regard is had to conserving the significance of the affected heritage assets and their settings. However as the adjacent cemetery is in a poor condition and clearly ‘at risk’ might the opportunity be taken for the Plan and associated development support improvements as part of a positive strategy</li> </ul>		



for the historic environment (NPPF para185)? Does the Plan make clear how this area of archaeological significance should be addressed?

- Concerns remain regarding components of housing supply and delivery.

<b>PC62</b>		
<b>WHSAP Page/Paragraph/Table:</b>	Existing Paragraph 5.56	
<b>Reason for proposed change:</b>	Improve clarity. Insert additional wording to address concerns raised by the Environment Agency, highlighting the need to address flood risk and drainage for all development sites.	
<b>Proposed change:</b>	Amend paragraph to read: "Proposals would need to provide for a high quality, sustainable development that enhances a key gateway approach to the town, whilst protecting the integrity of North Bradley as a village. <b><i>In addition, any subsequent planning application will need to be supported by a Flood Risk Assessment (incorporating an assessment of the predicted effects of climate change) and comprehensive drainage strategy to help inform matters such as layout and design.</i></b> "	
No. of responses received:	3	
<b>Comment ID No.</b>	<b>Consultee ID</b>	<b>Agent ID</b>
<b>150</b>	1138002	1138006
<b>269</b>	890227	1187890
<b>355</b>	1132626	1187757
<b>Summary of comments received:</b>		
<ul style="list-style-type: none"> <li>• The delivery of the proposed sites at Trowbridge could be impacted upon as there are significant constraints relating to drainage and heritage assets in particular.</li> <li>• With there being complexities in relation to the delivery of these sites that they may not realistically contribute towards meeting the housing requirement for Trowbridge</li> <li>• The council should identify further suitable sites so that they are futureproofing the Plan.</li> <li>• Surface water runoff from the Linden Homes controlled element of site H2.2 would be managed using a sustainable drainage strategy incorporating appropriately located Sustainable Drainage Systems (SuDS) features.</li> <li>• These features would include basins and swales to convey the surface water runoff across and from the proposed development at an attenuated rate.</li> <li>• The use of these features would also provide additional environmental and community benefits.</li> <li>• The use of these features is a key component of the layout of the site.</li> <li>• The allocations to the south and east of the town are likely to be affected by the same ecological issues that have affected Ashton Park coming forward</li> <li>• Concerns with regards to the deliverability of these sites within a timely manner (i.e. within the Plan period).</li> </ul>		

<b>PC63</b>		
<b>WHSAP Page/Paragraph/Table:</b>	Figure 5.7, Paragraph 5.58	
<b>Reason for proposed change:</b>	Factual update. Amend site boundary, as identified incorrectly, to align with Elizabeth Way Relief Road.	
<b>Proposed change:</b>	Amend the boundary of the allocation as set out in Annex D. And first sentence of paragraph 5.58 to read: "Approximately <del>46.33</del> <b>21.24</b> ha of land to the South West of Elizabeth Way is allocated for the development ...."	
<b>No. of responses received:</b>	3	
<b>Comment ID No.</b>	<b>Consultee ID</b>	<b>Agent ID</b>
<b>151</b>	1138002	1138006
<b>356</b>	1132626	1187757
<b>468</b>	983136	N/A
<b>Summary of comments received:</b>		
<ul style="list-style-type: none"> <li>• Persimmon Homes supports the proposed amendment to the boundary of the Elizabeth Way allocation (H2.3).</li> <li>• Uncertainty around delivery of Ashton Park is having a significant impact on the delivery at Trowbridge.</li> <li>• The shortfall needs to be addressed with urgency and that can only be achieved by properly planned growth that includes a sufficient number of allocations that are capable of delivering the required number of units.</li> <li>• The capacity of four of the allocations has increased by 200 units which is not unacceptable.</li> <li>• The increase in numbers suggests that the council may be seeking to address the shortfall through 'squeezing' units out of sites.</li> <li>• All Trowbridge site allocations have complexities in relation to the delivery and they may not realistically contribute towards meeting the housing requirement for Trowbridge.</li> <li>• The proposed modifications do not make any fundamental changes to the Plan or strategy for Trowbridge.</li> <li>• The proposed changes do not address the shortfall anticipated over the remaining years of the Plan period at Trowbridge.</li> <li>• As a key strategic settlement and the primary focus of development, it is not clear how under delivery of housing at Trowbridge can meet the spatial strategy and development requirements of Wiltshire.</li> <li>• There is a need for Trowbridge to deliver housing in the short-term to relieve pressure on other, less sustainable locations across the district.</li> <li>• The delivery of housing at Trowbridge continues to rely on the delivery of housing at Ashton Park where anticipated delivery trajectories are overly optimistic.</li> <li>• There remain serious questions over the deliverability of the identified allocations at Trowbridge given that there is potential for them to be affected by same ecological issues that have affected Ashton Park.</li> <li>• The Plan continues to postpone the delivery of housing at Trowbridge until after the Plan period which is an unacceptable approach</li> <li>• The council should allocate additional sites at Trowbridge.</li> <li>• The Plan continues to fail when assessed against the four tests of soundness.</li> </ul>		

<b>PC64 (In part, consequential change resulting from PC63)</b>		
<b>WHSAP Page/Paragraph/Table:</b>	Paragraph 5.58	
<b>Reason for proposed change:</b>	To maximise efficient use of land, increase the number of dwellings to approximately 355 units.	
<b>Proposed change:</b>	Amend first sentence in paragraph 5.58 as follows: "... land to the South West of Elizabeth Way is allocated for the development of approximately <del>205</del> <b>355</b> dwellings, as identified on the Policies Map."	
<b>No. of responses received:</b>	9	
<b>Comment ID No.</b>	<b>Consultee ID</b>	<b>Agent ID</b>
71	402574	N/A
152	1138002	1138006
332	840630	N/A
337	547867	N/A
357	1132626	1187757
368	1054271	N/A
386	1187763	N/A
469	983136	N/A
500	1131752	1131750
<b>Summary of comments received:</b>		
<ul style="list-style-type: none"> <li>• Allocation of land for housing on the 'Hilperton Gap' should be dropped as it would disrupt the Bechstein bat migration route, remove green space and is opposed by the vast majority of local residents.</li> <li>• Persimmon Homes supports the increase to the approximate number of dwellings to be delivered at the Elizabeth Way site allocation from 205 to 355.</li> <li>• The proposal to increase the quantum for site H2.3 to 355 dwellings is lower than what the site could sustainably deliver.</li> <li>• The site's delivery potential has been under-estimated. In total, it is considered that the entire site allocation area could accommodate approximately 450 dwellings.</li> <li>• The figure of 205 dwellings for this site stated in the pre-submission draft Plan equates to a gross density of circa 10 dwellings per hectare, and thus grossly underestimated the potential of the site to contribute to delivering the housing shortfall.</li> <li>• Persimmon would welcome an amendment to the Plan to require a site-wide masterplan as has been identified for the other large allocations in the draft Plan.</li> <li>• No justification is given for increasing the number of housing units on the sites.</li> <li>• Whereas high density may be acceptable and expected in the centre of a town, surely lower densities should be employed with most developments in rural areas.</li> <li>• The increase in area (16.33ha to 21.24ha) does not justify the increase in numbers especially when much of the 'new' land comprises balancing ponds for Elizabeth Way.</li> <li>• The suggested increase in housing numbers is contrary to Policy 1 of the Hilperton Neighbourhood Development Plan 'made' by Wiltshire Council on</li> </ul>		

the 5th November 2018. What is the point of a neighbourhood plan if its policies can be ignored?

- The capacity of four of the allocations has increased by 200 units which is not unacceptable.
- The increase in numbers suggests that the council may be seeking to address the shortfall through 'squeezing' units out of sites.
- The proposed modifications do not make any fundamental changes to the Plan or strategy for Trowbridge.
- The proposed changes do not address the shortfall anticipated over the remaining years of the Plan period at Trowbridge.
- As a key strategic settlement and the primary focus of development, it is not clear how under delivery at Trowbridge can meet the spatial strategy and development requirements of Wiltshire.
- There is a need for Trowbridge to deliver housing in the short term to relieve pressure on other, less sustainable locations for development across the district.
- The delivery of housing at Trowbridge continues to rely on the delivery of housing at Ashton Park where anticipated delivery trajectories are overly optimistic.
- There remain serious questions over the deliverability of the identified allocations at Trowbridge given that there is potential for them to be affected by same ecological issues that have affected Ashton Park.
- The Plan continues to postpone the delivery of housing at Trowbridge until after the Plan period which is an unacceptable approach.
- The council should allocate additional sites at Trowbridge.
- The Plan continues to fail when assessed against the four tests of soundness.

<b>PC65</b>		
<b>WHSAP Page/Paragraph/Table:</b>	Add to beginning of para 5.64	
<b>Reason for proposed change:</b>	In response to comments from Heritage England. To reflect the Heritage Impact Assessment undertaken by the Council and ensure appropriate consideration is given to heritage assets and their settings consistent with national policy.	
<b>Proposed change:</b>	Add text to beginning of paragraph 5.64: <u><b>“The site comprises historic field boundaries and has high archaeological value. It is adjacent to Trowbridge (Hilperton Road) Conservation Area and to Fieldways Highfield (Grade II* listed), a country house. Fieldways Highfield and its setting will need to be conserved in a manner appropriate to its significance. The relationship between development proposals and these heritage assets will need to be rigorously addressed through detailed design including provision for open greenspace in any layout.”</b></u>	
<b>No. of responses received:</b>	3	
<b>Comment ID No.</b>	<b>Consultee ID</b>	<b>Agent ID</b>
153	1138002	1138006
358	1132626	1187757
470	983136	N/A
<b>Summary of comments received:</b>		
<ul style="list-style-type: none"> <li>• The delivery of these sites could be impacted upon as there are significant constraints relating to drainage and heritage assets in particular. We note that the council has addressed these matters through the submission of evidence to support the allocations. Do not question any of the information put forward in the Proposed Change, which relates to the provision of development in the North &amp; West Wiltshire HMA and Trowbridge, except in the identification of the components of supply as those figures impact upon the amount of land that is to be allocated. In that regard, this and other modifications do not overcome our concerns regarding the ability of the identified sites to meet the housing requirement. The strategy is not effective, as there are reasonable alternatives that can deliver, and has not been properly justified. Our objection to the submitted Plan remains.</li> <li>• Note Proposed Change and others relating to amendments to the proposed allocations at Trowbridge. Concerns relate to components of housing supply and delivery at the town.</li> <li>• Persimmon has no objection to Proposed Change but note that the site is capable of being developed without damaging these assets and their setting. It should also be noted that the landscape features outside of the immediate grounds of the building are positioned within a small field immediately adjacent to the Fieldways Hotel within the allocation site. This field (c.0.8ha) is not controlled by Persimmon but will likely be retained as a green space.</li> <li>• Persimmon would also welcome an amendment to the Plan to require a site-wide masterplan, as has been identified for other large allocations in the Plan, to consider issues such as the potential impact on heritage assets.</li> <li>• Persimmon questions the description of the site in the Proposed Change as</li> </ul>		

having 'high archaeological value'. The reason given for this change is 'in response to comments from Heritage England'. However, their previous comments on the Plan note that the site is of 'medium archaeological value'.

<b>PC66</b>		
<b>WHSAP Page/Paragraph/Table:</b>	Paragraph 5.63	
<b>Reason for proposed change:</b>	Improve clarity. Insert additional wording to address concerns raised by the Environment Agency, highlighting the need to address flood risk and drainage for all development sites.	
<b>Proposed change:</b>	Amend paragraph to read: “An important measure will be the provision of landscaping between Elizabeth Way and new housing in order to attenuate noise and reduce the visual impact of this road. Consideration of drainage patterns and flood risk from all sources would need to inform any subsequent layout. In addition, surface water attenuation measures and improvements to existing on-site water infrastructure would need to be provided to support a comprehensive development of the site. <b><u>Proposals will therefore need to be supported by a Flood Risk Assessment (incorporating an assessment of the predicted effects of climate change) and comprehensive drainage strategy to help inform matters of layout and design.</u></b> ”	
No. of responses received:	2	
<b>Comment ID No.</b>	<b>Consultee ID</b>	<b>Agent ID</b>
<b>154</b>	1138002	1138006
<b>359</b>	1132626	1187757
<b>Summary of comments received:</b>		
<ul style="list-style-type: none"> <li>• The delivery of these sites could be impacted upon as there are significant constraints relating to drainage and heritage assets in particular.</li> <li>• With there being complexities in relation to the delivery of these sites that they may not realistically contribute towards meeting the housing requirement for Trowbridge.</li> <li>• The council should identify further suitable sites so that they are futureproofing the Plan.</li> <li>• The allocations to the south and east of the town are likely to be affected by the same ecological issues that have affected Ashton Park coming forward</li> <li>• Concerns with regards to the deliverability of these sites within a timely manner (i.e. within the Plan period).</li> </ul>		



<b>PC67</b>		
<b>WHSAP Page/Paragraph/Table:</b>	Figure 5.8, Paragraph 5.67	
<b>Reason for proposed change:</b>	In response to Natural England, extend site boundary to include land between the current boundary and the river, which allow for land to be used to mitigate bat impacts	
<b>Proposed change:</b>	Amend the boundary of the allocation as set out in <b>Annex E</b> . And first sentence of paragraph 5.67 to read: "Approximately <del>3.72</del> <b>5.93</b> ha of land at Church Lane is allocated for the development of approximately 45 dwellings, as identified on the Policies Map."	
No. of responses received:	6	
Comment ID No.	Consultee ID	Agent ID
<b>129</b>	1129173	1187476
<b>155</b>	1138002	1138006
<b>360</b>	1132626	1187757
<b>411</b>	1126922	N/A
<b>412</b>	1126922	N/A
<b>414</b>	1126922	N/A
<b>Summary of comments received:</b>		
<ul style="list-style-type: none"> <li>• The Proposed Change to the site area is not considered sound unless there is also a change to the proposed quantum of development. The dwelling figure should be for a 'minimum of 45 dwellings'.</li> <li>• The constraints of the site are clearly understood by the site owner and the design team and the proposed figure of circa 65 dwellings is considered entirely appropriate and justifiable. The site could accommodate a higher quantum of development, without detriment to ecological, landscape or heritage assets.</li> <li>• The capacity of four of the allocations has increased by 200 units which is not unacceptable.</li> <li>• The increase in numbers suggests that the council may be seeking to address the shortfall through 'squeezing' units out of sites.</li> <li>• The Proposed Changes do not make any fundamental changes to the Plan or strategy for Trowbridge.</li> <li>• The Proposed Changes do not address the housing shortfall anticipated over the remaining years of the Plan period at Trowbridge.</li> <li>• As a key strategic settlement and the primary focus of development, it is not clear how under delivery at Trowbridge can meet the spatial strategy and development requirements of Wiltshire.</li> <li>• There is a need for Trowbridge to deliver housing in the short term to relieve pressure on other, less sustainable locations for development across the district.</li> <li>• The delivery of housing at Trowbridge continues to rely on the delivery of housing at Ashton Park where anticipated delivery trajectories are overly optimistic.</li> <li>• There remain serious questions over the deliverability of the identified allocations at Trowbridge given that there is potential for them to be affected by the same ecological issues that have affected Ashton Park.</li> <li>• The Plan continues to postpone the delivery of housing at Trowbridge until</li> </ul>		

after the Plan period which is an unacceptable approach.

- The council should allocate additional sites at Trowbridge
- The Plan continues to fail when assessed against the four tests of soundness.
- Ancient hedgerows - we can evidence that the hedgerows were all in existence before 1850 (through maps) and are therefore protected under the Hedgerow Act.
- The council has not taken into account the heritage, environmental and flood importance of the site.
- The tiny Site 1021 with its unique historical rural setting and home to rare species of wildlife is inappropriate for development when compared against the vast majority of other sites in Trowbridge.

<b>PC68</b>		
<b>WHSAP Page/Paragraph/Table:</b>	Replace Paragraph 5.68 with new text	
<b>Reason for proposed change:</b>	In response to comments from Heritage England. To reflect the Heritage Impact Assessment undertaken by the Council and ensure appropriate consideration is given to heritage assets and their settings consistent with national policy.	
<b>Proposed change:</b>	<p>Replace 5.68 with new text:                  “Development proposals would need to ensure that the significance and setting of the Grade II Listed St John’s Church would be appropriately protected. To achieve this objective, access to the site would need to be secured via a new junction arrangement off the A361, rather than improvements to Church Lane.”  <b><u>“The site is adjacent to the Church of St John (Grade II listed), associated church school and schoolmasters house and is enclosed from the road by two rows of buildings at White Row Hill and Frome Road including Rose Villa (Grade II listed), 344 Frome Road (Grade II listed) and paddocks. There are key views across the site to St John’s spire from Southwick Country Park. The site comprises the degraded fragmentary remains of a post medieval water meadow system. The layout and design of the site would need to give great weight to conserving the significance of these heritage assets and their setting to minimise harm. Access to the site must be sensitively designed and accommodated in manner that minimises harm to heritage assets. This would need to be secured via a new junction arrangement off the A361, rather than improvements to Church Lane.”</u></b></p>	
No. of responses received:	6	
<b>Comment ID No.</b>	<b>Consultee ID</b>	<b>Agent ID</b>
74	402574	N/A
124	1187466	N/A
156	1138002	1138006
187	403792	N/A
361	1132626	1187757
450	903369	443671
<b>Summary of comments received:</b>		
<ul style="list-style-type: none"> <li>• Discrepancy between one part of the Plan, where the housing density is to be increased, and another, where the need for greater care to be given to heritage needs around Church Lane is stressed.</li> <li>• Friends of Southwick Country Park believe that together the park and the sites at Church Lane, Upper Studley and Southwick Court form a single historic landscape of water meadows and old pasture. It is a buffer between town and country which encourages wildlife into the park and protects it from disturbance.</li> <li>• The delivery of these sites could be impacted upon as there are significant constraints relating to drainage and heritage assets in particular. We note that the council has addressed these matters through the submission of</li> </ul>		

evidence to support the allocations. Do not question any of the information put forward in the Proposed Change, which relates to the provision of development in the North & West HMA and Trowbridge, except in the identification of the components of supply as those figures impact upon the amount of land that is to be allocated. In that regard, this and other modifications do not overcome our concerns regarding the ability of the identified sites to meet the housing requirement. The strategy is not effective, as there are reasonable alternatives that can deliver, and has not been properly justified. Our objection to the submitted Plan remains.

- Historic England note the Proposed Change, which seeks to ensure due regard is had to conserving the significance of the affected heritage assets and their settings, however might the Plan be more specific regarding the need to avoid the redevelopment of the paddock adjacent to Church Lane and to the rear of the listed buildings fronting Frome Road? Does the Plan make clear how this area of archaeological significance should be addressed?
- Note Proposed Change and others relating to amendments to the proposed allocations at Trowbridge. Concerns relate to components of housing supply and delivery at the town.
- Redrow Homes note the Proposed Change and acknowledge the key heritage constraints on the site. However, Redrow Homes consider that such constraints do not provide any certainty about the capacity for accommodating development, and raise questions about whether the housing should be sustainably accommodated at a less constrained location within the Trowbridge Community Area.

<b>PC69</b>		
<b>WHSAP Page/Paragraph/Table:</b>	Paragraph 5.67	
<b>Reason for proposed change:</b>	Improve clarity. Insert additional wording to address concerns raised by the Environment Agency, highlighting the need to address flood risk and drainage for all development sites.	
<b>Proposed change:</b>	Add text at the end of paragraph 5.67 as follows: “...It is an open site that slopes to the south-west towards the Lambrok Stream. <b><u>As parts of the site lie within Flood Zones 2 and 3, development proposals will need to be sequentially planned and supported by a Flood Risk Assessment (incorporating an assessment of the predicted effects of climate change). In addition, development proposals will need to be supported by a comprehensive drainage strategy designed to help inform site layout and provide attenuation measures, including Natural Flood Management – i.e. tree and hedgerow planting along the south-west margins of the site to slow the flow of surface water into the Lambrok Stream.</u></b> ”	
No. of responses received:	4	
<b>Comment ID No.</b>	<b>Consultee ID</b>	<b>Agent ID</b>
<b>75</b>	402574	N/A
<b>125</b>	1187466	N/A
<b>157</b>	1138002	1138006
<b>362</b>	1132626	1187757
<b>Summary of comments received:</b>		
<ul style="list-style-type: none"> <li>• The Lambrok Stream’s ecological importance has not been properly assessed.</li> <li>• Not possible to protect Lambrok Stream’s biota from consequences of development.</li> <li>• Development will significantly affect wildlife and biodiversity in this area.</li> <li>• The delivery of these sites could be impacted upon as there are significant constraints relating to drainage and heritage assets in particular.</li> <li>• With there being complexities in relation to the delivery of these sites that they may not realistically contribute towards meeting the housing requirement for Trowbridge.</li> <li>• The council should identify further suitable sites so that they are futureproofing the Plan.</li> <li>• H2.4, H2.5, H2.6 - these three sites should be removed from HSAP and reassessed together to provide a comprehensive approach to planning development and necessary mitigation measures, hopefully in consultation with the Friends of Southwick Country Park.</li> <li>• H2.4, H2.5, H2.6 - “Joined-up Planning” would look at the Lambrok stream as a whole. The stream is a resource in many ways and imaginative planning would have produced a design brief to look at the flood risk and ecology opportunities over its whole length across these three sites.</li> <li>• The allocations to the south and east of the town are likely to be affected by the same ecological issues that have affected Ashton Park coming forward.</li> <li>• Concerns with regards to the deliverability of these sites within a timely manner (i.e. within the Plan period).</li> </ul>		

<b>PC70</b>		
<b>WHSAP Page/Paragraph/Table:</b>	Paragraph 5.73	
<b>Reason for proposed change:</b>	To maximise efficient use of land and in response to representation increase the number of dwellings to approximately 45 dwellings, and correct site area.	
<b>Proposed change:</b>	Amend first sentence of paragraph 5.73 to read: "Approximately <del>2.33</del> <b>2.27</b> ha of land at Upper Studley is allocated for the development of approximately <del>20</del> <b>45</b> dwellings, as identified on the Policies Map."	
No. of responses received:	5	
<b>Comment ID No.</b>	<b>Consultee ID</b>	<b>Agent ID</b>
<b>78</b>	402574	N/A
<b>99</b>	395553	901806
<b>158</b>	1138002	1138006
<b>363</b>	1132626	1187757
<b>453</b>	903369	443671
<b>Summary of comments received:</b>		
<ul style="list-style-type: none"> <li>• The landowners of the site support in principle the proposed change to the allocation and are committed to working with the council on a Statement of Common Ground.</li> <li>• Concern that the justification to increase capacity of H2.5 to maximise efficient use of land means that the original appraisal work was not fit for purpose. If so, then all other sites need querying.</li> <li>• Concern with regard to the deliverability of the sites in a timely manner.</li> <li>• The council need to demonstrate the effects of increasing the number of units on the site.</li> <li>• The site's location in Flood Zone 3 and 2 places significant constraint on its developable area, as well as the nearby heritage assets along Frome Road.</li> <li>• Trees to the south of the site may have importance for bat species relevant to the Bath and Bradford on Avon Bats SAC. The extent to which this will constrain the site and neutralise land for development is unknown.</li> </ul>		

<b>PC71</b>	
<b>WHSAP Page/Paragraph/Table:</b>	Paragraph 5.73
<b>Reason for proposed change:</b>	Improve clarity. Insert additional wording to address concerns raised by the Environment Agency, highlighting the need to address flood risk and drainage for all development sites.
<b>Proposed change:</b>	Add text to end of paragraph 5.73 as follows: “...The land slopes towards the stream and is bound to the south by tall, mature poplar trees. <b><u>As parts of the site lie within Flood Zones 2 and 3, development proposals will need to be sequentially planned and supported by a Flood Risk Assessment (incorporating an assessment of the predicted effects of climate change). In addition, development proposals will need to be supported by a comprehensive drainage strategy designed to help inform site layout and provide attenuation measures, including Natural Flood Management – i.e. tree and hedgerow planting along the southern margins of the site to slow the flow of surface water into the Lambrok Stream.</u></b> ”
<b>No. of responses received:</b>	4

<b>Comment ID No.</b>	<b>Consultee ID</b>	<b>Agent ID</b>
<b>76</b>	402574	N/A
<b>126</b>	1187466	N/A
<b>159</b>	1138002	1138006
<b>364</b>	1132626	1187757

<b>Summary of comments received:</b>
<ul style="list-style-type: none"> <li>• The ecological importance of these sites has not been assessed.</li> <li>• WHSAP does not recognise the ecological importance of the Lambrok stream</li> <li>• Urbanisation will not improve the biodiversity of Lambrok Stream, it will pose a threat to it.</li> <li>• The Lambrok has form and function in the landscape that will not be enhanced by residential development; it is a habitat for species that will not survive development.</li> <li>• There has been no assessment of the complex ecological importance of Southwick Court's 16th Century moat, which the Lambrok flows through.</li> <li>• We feel the importance of the green space between Southwick and Trowbridge cannot be over-emphasised.</li> <li>• The delivery of these sites could be impacted upon as there are significant constraints relating to drainage and heritage assets in particular.</li> <li>• With there being complexities in relation to the delivery of these sites that they may not realistically contribute towards meeting the housing requirement for Trowbridge.</li> <li>• The council should identify further suitable sites so that they are futureproofing the Plan.</li> <li>• H2.4, H2.5, H2.6 - these three sites should be removed from HSAP and reassessed together to provide a comprehensive approach to planning development and necessary mitigation measures, to be comprehensively considered, hopefully in consultation with the Friends of Southwick Country Park. H2.4, H2.5, H2.6 - "Joined-up Planning" would look at the Lambrok</li> </ul>

stream sections in one. The stream is a resource in many ways and imaginative planning would have produced a design brief to look at the flood risk and ecology opportunities over its whole length across these three sites.

- The allocations to the south and east of the town are likely to be affected by the same ecological issues that have affected Ashton Park coming forward.
- Concerns with regards to the deliverability of these sites within a timely manner (i.e. within the Plan period).



<b>PC72</b>		
<b>WHSAP Page/Paragraph/Table:</b>	Paragraph 5.78	
<b>Reason for proposed change:</b>	In response to comments from Heritage England. To reflect the Heritage Impact Assessment undertaken by the Council and ensure appropriate consideration is given to heritage assets and their settings consistent with the national policy.	
<b>Proposed change:</b>	<p>Amend paragraph 5.78 to read:                  “The area is of historic significance as water meadows <b><u>(non- designated heritage asset)</u></b> associated with the Grade II* Listed Southwick Court Farmstead <b><u>that lies to the south of the site. The Southwick Court Farmstead is a heritage asset of significant importance. It is a medieval, manorial farmstead that includes a farmhouse, gatehouse and bridge juxtaposed with later post- medieval/modern additions surrounded by a moat.</u></b> An essential objective of detailed design will be to minimise harm to its significance. The setting to this heritage asset will be preserved, to the greatest extent possible, informed by <b><u>the Councils Heritage Impact Assessment and</u></b> the results of <del>further</del> <b><u>more detailed heritage assessment work to support any subsequent planning application.</u></b> Heritage Impact Assessment. Taking account of the weight attached to the significance of the assets, <b><u>alone and in combination,</u></b> any residual harm would require a clear and convincing justification <b><u>within any subsequent planning application</u></b> and should not be substantial. The social, <b><u>environmental</u></b> and economic advantages of the development, including the provision of homes <b><u>along with significant improvements to biodiversity and provision of open space will</u></b> achieve substantial public benefits. A <b><u>sensitively designed,</u></b> comprehensive development scheme will need to <b><u>minimise harm by ensuring</u></b> <del>ensure</del> that new homes are directed to the east of the Lambrok Stream <b><u>and built in a manner that respects both the topography of the land and existing urban form to the immediate north.</u></b> Land to the west may become either formal or informal open space or remain in agricultural use, but will not be developed for new homes. The character of the area will therefore help to retain the high significance of <b><u>Southwick Court and associated</u></b> <del>this</del> heritage assets.”</p>	
<b>No. of responses received:</b>	10	
<b>Comment ID No.</b>	<b>Consultee ID</b>	<b>Agent ID</b>
79	402574	N/A
127	1187466	N/A
160	1138002	1138006
188	403792	N/A

<b>248</b>	1126042	N/A
<b>256</b>	1126309	N/A
<b>365</b>	1132626	1187757
<b>398</b>	1137560	1138525
<b>451</b>	903369	443671
<b>458</b>	1126137	N/A

**Summary of comments received:**

- Extensive revision of the policy is indicative of poor research
- Research is incomplete (bat mitigation strategy and heritage considerations). Proposed Trowbridge sites should be withdrawn until the mitigation strategy is available.
- The Lambrok will not be enhanced by residential development, and habitat will not survive.
- There has been no assessment of the ecology of Southwick Court's 16th Century moat.
- The delivery of these sites could be impacted upon as there are significant constraints relating to drainage and heritage assets in particular. We note that the council has addressed these matters through the submission of evidence to support the allocations. Do not question any of the information put forward in the Proposed Change, which relates to the provision of development in the North & West HMA and Trowbridge, except in the identification of the components of supply as those figures impact upon the amount of land that is to be allocated. In that regard, this and other modifications do not overcome our concerns regarding the ability of the identified sites to meet the housing requirement. The strategy is not effective, as there are reasonable alternatives that can deliver, and has not been properly justified. Our objection to the submitted Plan remains.
- Historic England note the Proposed Change, which seeks to ensure due regard is had to conserving the significance of the affected heritage assets and their settings, however during recent discussion with the local authority and site promoters, it was apparent that to avoid undue harm to the significance of Southwick Court, the design of any future road across the site and junction off the A361 (Frome Road) required a very sensitive bespoke approach; a rural/parkland/country estate typology with discreet low level lighting and unobtrusive signage to minimise harmful intrusion within this historic landscape. It will be important for the Plan to clearly set out such expectations.
- The council acknowledges the historic importance of the site but in response to comments from Heritage England, without reference to any representations received from members of the public. Despite acknowledging the setting as a 'significant heritage asset', the Plan still proposes to build on the water meadows on the east of the site, even acknowledging that some harm may come from future planning applications. Various caveats to pacify the concerns of Heritage England still indicate that some harm to these heritage assets would be permitted. This is not reasonable. The obvious solution would be to remove the site from the Plan and preserve these assets, including the landscape. Earlier in the process, this site was assessed as 'less sustainable', the right decision given even then knowledge about the heritage assets. This early assessment is supported by the council's belated

acknowledgement of these 'significant heritage assets'. The Plan is not sound because it is not justified.

- Concern about the use of land to the west of Lambrok Stream (i.e. water meadows) for 'formal or informal open space or to remain in agricultural use'. These water meadows are, and always have been, in agricultural use since Southwick Court Farmstead was built. Their heritage integrity can only be maintained if they continue to remain as agricultural land, with the existing ancient footpaths remaining open to public use. Formal or open space has never been part of the setting of Southwick Court and cannot be justified to the detriment of the water meadows that complement its setting. This demonstrates that the Proposed Changes to the Plan are not justified and, therefore, not sound, and that the site should be removed from the Plan because it is an unreasonable strategy.
- Arguments against development of the site are as follows:
  1. Site is widely recognised as an area of 'archaeological landscape of considerable importance'.
  2. Site is recognised as of significant importance as referenced in the Listed Buildings and Conservation Area Act 1990, as it encompasses the Grade II\* Listed Southwick Court Farm and farmstead with its medieval moat and post medieval water meadow system.
  3. Development of the land would make Bramble Farm unsustainable by removing fields that provide essential winter feed.
  4. The site has historically provided recreational and leisure pursuits for the local community.
  5. Site encompasses hedgerows that fulfil the criteria of 'important' as set out in the 1997 Hedgerow Act.
  6. Site encompasses Level 2 and 3 flood plains.
  7. Access to the site would require breaking through 'important' and protected hedgerows and protected trees, dissecting flood plains and/ or building a culvert/ bridge from the A361.
- Note Proposed Change and others relating to amendments to the proposed allocations at Trowbridge. Concerns relate to components of housing supply and delivery.
- Waddeton Park support Proposed Changes to H2.6 in relation to heritage. A full Heritage Impact Assessment, undertaken by Cotswolds Archaeology, supersedes the LUC Wiltshire Housing Sites Allocations Plan Heritage Impact Assessment (March 2018) and corrects factual errors in that earlier high-level assessment. This provides certainty that the impact on heritage assets is acceptable and, as agreed with Historic England 'less than substantial'.
  1. Remnant Water Meadows: study confirms none on eastern part of site. Remnant features, on western side, have little value beyond their physicality, which has been substantially eroded. Thus, their setting must be commensurately limited. The draft allocation policy precludes development on the western side, thus preserving the assets, and there will be limited disturbance of the system (for access), which will be sensitively designed
  2. Southwick Court: key setting of the listed buildings comprises their location within the historic moated enclosure, which is very insular in its setting with very limited views of the historic buildings from beyond; this will not be

harmed by development. Keeping the western part of the site free from development enables an open parkland setting to be maintained across this part of the site. A sensitively designed access road, through the detailed planning application, will ensure that the effects of the western part of the development site on the heritage assets are minimalised.

Waddeton Park would support inclusion of a specific reference to the requirement for a sensitively designed rural access road on the western side of the allocation site

- Redrow do not believe that this Proposed Change provides enough certainty about the capacity of the site to accommodate development. This work must be progressed as part of the plan-making process. As it stands, there is not enough to justify the principal and amount of development on this site. A sequential flood risk assessment should also be undertaken at the plan-making stage. Sites that may not meet the sequential test should not be allocated, particularly when sites at lower risk of flooding are available.

<b>PC73</b>	
<b>WHSAP Page/Paragraph/Table:</b>	Paragraph 5.79
<b>Reason for proposed change:</b>	Improve clarity. Insert additional wording to address concerns raised by the Environment Agency, highlighting the need to address flood risk and drainage for all development sites.
<b>Proposed change:</b>	Add text to end of paragraph 5.79, as follows: “...The Lambrok Stream and its respective flood plain should be enhanced as a local amenity feature of the site in conjunction with development proposed at Upper Studley above. <b><u>As parts of the site lie within Flood Zones 2 and 3, development proposals will need to be sequentially planned and supported by a Flood Risk Assessment (incorporating an assessment of the predicted effects of climate change). In addition, development proposals will need to be supported by a comprehensive drainage strategy designed to help inform site layout and provide attenuation measures, including Natural Flood Management – i.e. tree and hedgerow planting along the northern margins of the site to slow the flow of surface water into the Lambrok Stream and associated field drainage systems.</u></b> ”
<b>No. of responses received:</b>	8

<b>Comment ID No.</b>	<b>Consultee ID</b>	<b>Agent ID</b>
<b>77</b>	402574	N/A
<b>128</b>	1187466	N/A
<b>161</b>	1138002	1138006
<b>366</b>	1132626	1187757
<b>399</b>	1137560	1138525
<b>436</b>	1126309	N/A
<b>452</b>	903369	443671
<b>459</b>	1126137	N/A

<b>Summary of comments received:</b>
<ul style="list-style-type: none"> <li>• The ecological importance of these sites has not been assessed.</li> <li>• WHSAP does not recognise the ecological importance of the Lambrok stream</li> <li>• Urbanisation will not improve the biodiversity of Lambrok Stream, it will pose a threat to it.</li> <li>• The Lambrok has form and function in the landscape that will not be enhanced by residential development; it is a habitat for species that will not survive development.</li> <li>• There has been no assessment of the complex ecological importance of Southwick Court's 16th Century moat, which the Lambrok flows through.</li> <li>• We feel the importance of the green space between Southwick and Trowbridge cannot be over-emphasised.</li> <li>• The delivery of these sites could be impacted upon as there are significant constraints relating to drainage and heritage assets in particular.</li> <li>• With there being complexities in relation to the delivery of these sites that they may not realistically contribute towards meeting the housing requirement for Trowbridge.</li> <li>• The council should identify further suitable sites so that they are futureproofing</li> </ul>

the Plan.

- H2.4, H2.5, H2.6 - these three sites should be removed from HSAP and reassessed together to provide a comprehensive approach to planning development and necessary mitigation measures, to be comprehensively considered, hopefully in consultation with the Friends of Southwick Country Park. H2.4, H2.5, H2.6 - "Joined-up Planning" would look at the Lambrok stream sections in one. The stream is a resource in many ways and imaginative planning would have produced a design brief to look at the flood risk and ecology opportunities over its whole length across these three sites.
- The allocations to the south and east of the town are likely to be affected by the same ecological issues that have affected Ashton Park coming forward.
- Concerns with regards to the deliverability of these sites within a timely manner (i.e. within the Plan period).
- A full suite of ecological surveys has been conducted, and these have raised no significant constraints to development on the allocation site.
- Development on the allocation site would not give rise to unacceptable landscape or visual impacts.
- A full Flood Risk Assessment has been undertaken which confirms the suitability of the site for development within the climate change +40% scenario.
- There has been widespread public condemnation of Site 3565 from the local community.
- The site encompasses both Level 2 and 3 flood plains. The area is bisected by the Lambrok Stream and the Lambrok Brook. The site has historically and regularly experienced episodes of significant flooding.
- We do not consider there is adequate evidence to justify the principle and quantum of housing development proposed in this location.
- The council should not be allocating sites in full knowledge that they may not meet the requirement of the sequential test, particularly when sites at a lower risk of flooding are available.

<b>PC74</b>		
<b>WHSAP Page/Paragraph/Table:</b>	New paragraph under 5.87	
<b>Reason for proposed change:</b>	Improve clarity. Highways England has raised that there may be cumulative impacts on the A36 arising from proposed housing allocations at Warminster and this requires consideration.	
<b>Proposed change:</b>	Add new paragraph under 5.87 as follows: <b><u>"Developments will be required to address any direct or indirect cumulative impacts on the A36."</u></b>	
No. of responses received:	2	
<b>Comment ID No.</b>	<b>Consultee ID</b>	<b>Agent ID</b>
80	402574	N/A
183	903251	N/A
<b>Summary of comments received:</b>		
<ul style="list-style-type: none"> <li>• Lack of concern about cumulative impact of development on traffic conditions. New development will exacerbate existing congestion in Trowbridge and should be delayed until capacity improvements considered; including park and ride/ parking control.</li> <li>• Highways England concerned about cumulative impact of traffic and this is not addressed by Wiltshire Council's highways section, which only considers the effect of each separate development on congestion.</li> <li>• Highways England welcomes Proposed Change PC74, which strengthens the requirement for proposals to be supported by appropriate transport assessment and mitigation necessary to ensure that impact on the Strategic Road Network (SRN) is not severe.</li> </ul>		

<b>PC76</b>		
<b>WHSAP Page/Paragraph/Table:</b>	Paragraph 5.89	
<b>Reason for proposed change:</b>	In response to comments from Historic England. To reflect the Heritage Impact Assessment undertaken by the council and ensure appropriate consideration is given to heritage assets and their settings consistent with the national policy.	
<b>Proposed change:</b>	Amend paragraph 5.89 to read: <u><b>“Bishopstrow Conservation Area encloses the site on two sides and there are a number of historic buildings within close proximity to the site boundary, including Bishopstrow House (Grade II listed) and its designed landscape, as well as Bishopstrow Home Farm (non- designated heritage asset). The archaeological potential on the site is high.</b></u> The main access will be from Boreham Road but the south-west part of the site is considered to be unsuited to built development because of its sensitivity in heritage and landscape terms. This land may remain in agricultural use or becomes either formal or informal open space, but will be undeveloped so the character of the area continues to preserve the significance of heritage assets.	
<b>No. of responses received:</b>	3	
<b>Comment ID No.</b>	<b>Consultee ID</b>	<b>Agent ID</b>
<b>245</b>	706891	N/A
<b>396</b>	709291	N/A
<b>445</b>	645345	389644
<b>Summary of comments received:</b>		
<ul style="list-style-type: none"> <li>• The proposed changes do not adequately respond to issues raised by respondents to previous consultations.</li> <li>• The potential landscape/conservation impacts highlighted in evidence (such as LUC report) have not been adequately addressed.</li> <li>• The LUC report provides a comprehensive assessment of the significance of effects than was considered in the Sustainability Appraisal.</li> <li>• The Bishopstrow Conservation Area should be extended to encompass part of the allocated site.</li> <li>• The site promoters are concerned that with inaccuracy of the proposed insertion of <i>“The archaeological potential on the site is high”</i>, which does not appear to be based on up to date factual evidence. Alternative evidence is presented to the contrary.</li> <li>• The site promoters object to the wording <i>“the south-west part of the site is considered to be unsuited to built development because of its sensitivity in heritage and landscape terms”</i>. Disagree that supporting text should specify that the land is ‘unsuited’ as this is a premature conclusion. Alternative policy wording is suggested.</li> <li>• The site promoters object to the requirement for 2ha undeveloped land; the proposed allocation boundary; and the site capacity of 100 dwellings.</li> <li>• The Proposed Change does not provide additional wording to ensure the policy adequately addresses the need to protect the River Avon SAC.</li> </ul>		



Concerns over health and infrastructure provision, highways impacts and lack of employment opportunities.

<b>PC77</b>		
<b>WHSAP Page/Paragraph/Table:</b>	Paragraph 5.90	
<b>Reason for proposed change:</b>	Improve context. In response to comments from Heritage England. To reflect the Heritage Impact Assessment undertaken by the council and ensure appropriate consideration is given to heritage assets and their settings consistent with the national policy.	
<b>Proposed change:</b>	Amend paragraph 5.90 to read: <u><b>"The design and layout of the site will need to give great weight to conserving the significance of these heritage assets to minimise harm. Access to the site must be accommodated in a sensitive manner.</b></u> The design of an <u><b>the</b></u> access point should also minimise <u><b>and mitigate</b></u> the loss of the high wall that is characteristic of this approach to the town. Secondary access, in particular for cycling and walking, should also be sought through The Dene and improvements should be made to footpath WARM40."	
<b>No. of responses received:</b>	3	
<b>Comment ID No.</b>	<b>Consultee ID</b>	<b>Agent ID</b>
<b>189</b>	403792	N/A
<b>403</b>	709291	N/A
<b>434</b>	706891	N/A
<b>Summary of comments received:</b>		
<ul style="list-style-type: none"> <li>• Historic England are of the view that at present it has not been demonstrated with any degree of confidence that a residential scheme could come forward to accord with the objectives of the Plan and its specific conditions for the site; legislation, national policy and guidance in respect of the great weight that needs to be afforded the conservation of affected heritage assets and their setting. At present Historic England consider the site allocation is inappropriate.</li> <li>• The proposed changes do not adequately respond to issues raised by respondents to previous consultations.</li> <li>• The potential landscape/conservation impacts highlighted in evidence (such as LUC report) have not been adequately addressed.</li> <li>• The LUC report provides a comprehensive assessment of the significance of effects than was considered in the Sustainability Appraisal.</li> <li>• The Bishopstrow Conservation Area should be extended to encompass part of the allocated site.</li> <li>• The proposed change does not provide additional wording to ensure the policy adequately addresses the need to protect the River Avon SAC.</li> <li>• Concerns over health and infrastructure provision, highways impact and lack of employment opportunities.</li> </ul>		

<b>PC78</b>		
<b>WHSAP Page/Paragraph/Table:</b>	Paragraph 5.91	
<b>Reason for proposed change:</b>	<p>In response to comments from Heritage England. To reflect the Heritage Impact Assessment undertaken by the council and ensure appropriate consideration is given to heritage assets and their settings consistent with the national policy.</p> <p>Additional wording to address concerns raised by the Environment Agency, highlighting the need to address flood risk for all development sites.</p>	
<b>Proposed change:</b>	<p>Amend paragraph 5.91 to read:                  "The site has a number of heritage and related landscape considerations. A sensitively designed scheme should be brought forward which has been informed by a <del>the Council's</del> Heritage Impact Assessment and <b><u>further detailed site specific assessments required to support the planning application. Development will need to</u></b> appropriately responds to the character and locational <b><u>context</u></b> of the site and <b><u>robustly</u></b> respects the significance of the following heritage assets:</p> <ul style="list-style-type: none"> <li>• Listed Buildings in the vicinity of the site, including Bishopstrow House</li> <li>• Bishopstrow Conservation Area</li> <li>• Views from Battlesbury Camp hillfort</li> </ul> <p><b><u>In addition, development proposals will need to be supported by a Flood Risk Assessment (incorporating an assessment of the predicted effects of climate change).</u></b>"</p>	
No. of responses received:	3	
<b>Comment ID No.</b>	<b>Consultee ID</b>	<b>Agent ID</b>
251	871876	N/A
404	709291	N/A
435	706891	N/A
<b>Summary of comments received:</b>		
<ul style="list-style-type: none"> <li>• The proposed changes do not adequately respond to issues raised by respondents to previous consultations.</li> <li>• The potential landscape/conservation impacts highlighted in evidence (such as LUC report) have not been adequately addressed.</li> <li>• The LUC report provides a comprehensive assessment of the significance of effects than was considered in the Sustainability Appraisal.</li> <li>• The Bishopstrow Conservation Area should be extended to encompass part of the allocated site.</li> <li>• The proposed change does not provide additional wording to ensure the policy adequately addresses the need to protect the River Avon SAC..</li> <li>• The council needs to have a better understanding of all causes of flooding and to devise a strategy to manage these issues.</li> <li>• Warminster has been highlighted as an area which needs more detailed assessment (SFRA2). This has not occurred, despite agreement between</li> </ul>		

the Environment Agency and the council in the Core Strategy examination.

- Concerns over health and infrastructure provision, highways impact and lack of employment opportunities.

<b>PC80</b>		
<b>WHSAP Page/Paragraph/Table:</b>	Paragraph 5.94	
<b>Reason for proposed change:</b>	Improve clarity. Insert additional wording to: address concerns raised by the Environment Agency, highlighting the need to address flood risk; and address issues associated with the waste management facility.	
<b>Proposed change:</b>	Amend paragraph to read: “The site is formed of land between the A36 and Deverill Road which lies adjacent to the Bore Hill Farm bio-digester. <b><u>Considering the site context, any subsequent development proposals (e.g. layout and screening) will need to take account of potential issues associated with the operational waste management facility, these may include: noise, dust and odour.</u></b> There is some limited screening on the north boundary with existing development at Bradley Close and Ludlow Close. Additional landscape screening at the site boundaries would be required to preserve and maintain the living conditions of adjoining residential dwellings. Vehicular access will be provided from Deverill Road, and connection to and improvement of public right of way WARM60 should be provided. <b><u>In addition, development proposals will need to be supported by a Flood Risk Assessment (incorporating an assessment of the predicted effects of climate change).</u></b> ”	
No. of responses received:	1	
<b>Comment ID No.</b>	<b>Consultee ID</b>	<b>Agent ID</b>
<b>433</b>	555472	N/A
<b>Summary of comments received:</b>		
<ul style="list-style-type: none"> <li>The Environment Agency (EA) have commented that since their previous comments were submitted the EA have been involved as the regulator in charge of Permitting the adjacent waste management facility (Anaerobic Digestion [AD] plant). Previous comments were made about potential for odour from the plant. The EA wish to add to previous comments by adding that there are many records of odour complaints relating to this AD plant. While the EA are working with the site operator to address the problem, odour persists as an issue for many existing local residents. Therefore, odour is very likely to be an issue for new residents at Bore Hill Farm in the future. The EA would encourage Wiltshire Council to carefully consider the allocation of this site for housing. Notwithstanding this, the EA would not wish to object to this allocation.</li> </ul>		

<b>PC85</b>		
<b>WHSAP Page/Paragraph/Table:</b>	Paragraph 5.105	
<b>Reason for proposed change:</b>	Factual update. Amend reference to the school area to refer to the correct size of 0.2 hectares.	
<b>Proposed change:</b>	Amend text to read: “Approximately 2.44ha of land adjacent to the Primary School is allocated for the development of approximately 50 dwellings and <del>0.25</del> <b>0.2</b> ha to allow for the expansion of the primary school, as shown on the Policies Map.”	
No. of responses received:	1	
<b>Comment ID No.</b>	<b>Consultee ID</b>	<b>Agent ID</b>
<b>284</b>	1133384	1128217
<b>Summary of comments received:</b>		
<ul style="list-style-type: none"> <li>• Support amended text to paragraph 5.015 to correspond with text of Policy H2.11 with regard to Hullavington Primary School.</li> <li>• Community consultation undertaken by Hullavington Neighbourhood Plan Steering Group identifies community aspirations for the delivery of community benefits at site H2.11.</li> </ul>		

<b>PC86</b>		
<b>WHSAP Page/Paragraph/Table:</b>	Paragraph 5.107	
<b>Reason for proposed change:</b>	Factual update. Remove first and second sentences which refers to land to the north of the proposed allocation.	
<b>Proposed change:</b>	Amend text to read: <del>“A sufficient buffer should be provided to the watercourse to the north of the site to safeguard the function of the tributary to the River Gauze. It also provides options to deliver public open space and biodiversity enhancement.</del> Mature hedgerows and trees would be retained and planting Barberry will enhance habitat for the Barberry Carpet moth, a priority species of the BAP. Development would need to retain the historic footpath through the site to the surrounding countryside. Moreover, footpaths HULL29, HULL1 and HULL33 should be retained and improved as part of the development of the site.”	
<b>No. of responses received:</b>	1	
<b>Comment ID No.</b>	<b>Consultee ID</b>	<b>Agent ID</b>
<b>296</b>	1133384	1128217
<b>Summary of comments received:</b>		
<ul style="list-style-type: none"> <li>Amendment to PC86 is correct (removal of reference to land outside allocation site to Policy H2.11). However, Pegasus' consultation response to the Regulation 19 WHSAP consultation argued for an increase in the site size of the allocation to 3.8ha as per SHLAA site 690. This wider site would have included the area for which text is now proposed to be deleted from the Plan. The consultation response did not provide an evidence base that required the deletion of the text from the Plan it merely pointed out that it would not be possible to provide public open space/biodiversity enhancements along the corridor of the watercourse as part of a comprehensive scheme if this land was not included within the allocation.</li> <li>The submitted Plan does not increase the size of the site allocated in Policy H2.11, therefore the opportunity is lost to secure open space/biodiversity enhancements. These issues are being addressed through the emerging Hullavington Neighbourhood Plan.</li> </ul>		

<b>PC87</b>		
<b>WHSAP Page/Paragraph/Table:</b>	Paragraph 5.107	
<b>Reason for proposed change:</b>	Improve clarity. Insert additional wording to address concerns raised by the Environment Agency, highlighting the need to address flood risk and drainage for all development sites, as well as groundwater.	
<b>Proposed change:</b>	Additional text to be added to the end of the paragraph: <b><u>“Considering the size of the site any subsequent planning application will need to be supported by a Flood Risk Assessment (incorporating an assessment of the predicted effects of climate change) and comprehensive drainage strategy to help inform matters such as layout and design. In addition, as the site lies within Groundwater Protection Zones 1 and 2, development proposals will need to comply with Core Policy 68 (Water resources) with applications demonstrating that regard has been paid to the advice set out in the Environment Agency’s groundwater protection policy.”</u></b>	
No. of responses received:	1	
<b>Comment ID No.</b>	<b>Consultee ID</b>	<b>Agent ID</b>
<b>298</b>	1133384	1128217
<b>Summary of comments received:</b>		
<ul style="list-style-type: none"> <li>The Environment Agency (EA) requirements regarding flood risk/groundwater protection at the site the site allocated in Policy H2.11 will be addressed in any forthcoming planning application by the submission of a Flood Risk Assessment/Groundwater Risk Assessment and additional supporting information to comply with Core Policy 68. Initial research indicates that the EA requirements regarding groundwater do not pose any risk to the development of the site and that all matters relating to potential pollutants; surface water runoff and mitigation can be conditioned at outline planning permission stage.</li> </ul>		



<b>PC88</b>		
<b>WHSAP Page/Paragraph/Table:</b>	Figure 5.16 Paragraph 5.109	
<b>Reason for proposed change:</b>	Factual update. The site boundary is identified incorrectly and should be amended to remove the track running along the western boundary of the site.	
<b>Proposed change:</b>	Amend the boundary of the allocation as set out in <b>Annex G</b> . And first sentence of paragraph 5.109 to read: “Land East of Farrells Field, Yatton Keynell is allocated for the development of approximately 30 dwellings on approximately <del>4.3</del> <b>1.2</b> ha of land, as shown on the Policies Map.”	
No. of responses received:	1	
<b>Comment ID No.</b>	<b>Consultee ID</b>	<b>Agent ID</b>
<b>471</b>	983136	N/A
<b>Summary of comments received:</b>		
<ul style="list-style-type: none"> <li>Support the Proposed Change to amend the allocation boundary to remove the adjacent track. The track is not a Public Right of Way and is not appropriate for use as a vehicular to the site.</li> </ul>		

<b>PC89</b>		
<b>WHSAP Page/Paragraph/Table:</b>	Paragraph 5.109	
<b>Reason for proposed change:</b>	Improve clarity. Insert additional wording to address concerns raised by the Environment Agency, highlighting the need to address flood risk and drainage for all development sites, as well as groundwater.	
<b>Proposed change:</b>	Amend paragraph after first sentence, as follows: <u><b>“Considering the size of the site any subsequent planning application will need to be supported by a Flood Risk Assessment (incorporating an assessment of the predicted effects of climate change) and comprehensive drainage strategy to help inform matters such as layout and design. In addition, as the site lies within Groundwater Protection Zone 2 development proposals will need to comply with Core Policy 68 (Water resources) with applications demonstrating that regard has been paid to the advice set out in the Environment Agency’s groundwater protection policy. It is The site</b></u> is well located with regard to local services and facilities. The site <u><b>It is</b></u> in agricultural use and represents the continuation of recent development in this part of the settlement.”	
<b>No. of responses received:</b>	1	
<b>Comment ID No.</b>	<b>Consultee ID</b>	<b>Agent ID</b>
472	983136	N/A
<b>Summary of comments received:</b>		
<ul style="list-style-type: none"> <li>No objection to the Proposed Change to require any planning application to be supported by a Flood Risk Assessment (FRA). Persimmon Homes is preparing a detailed planning application for the development of the site, which is supported by an FRA / Drainage Strategy.</li> </ul>		

<b>PC90</b>		
<b>WHSAP Page/Paragraph/Table:</b>	Paragraph 5.110	
<b>Reason for proposed change:</b>	Factual update. The site boundary is to be amended to remove the track running along the western boundary of the site. Consequential change to removed text relating to woodland corridor should also be removed.	
<b>Proposed change:</b>	Amend text to read: “ <del>A woodland corridor along the western boundary should be retained as a wildlife corridor.</del> Retention of the existing boundary vegetation...”	
No. of responses received:	1	
<b>Comment ID No.</b>	<b>Consultee ID</b>	<b>Agent ID</b>
<b>473</b>	983136	N/A
<b>Summary of comments received:</b>		
<ul style="list-style-type: none"> <li>Support the proposed change to amend the allocation boundary to remove the adjacent track. The track is not a Public Right of Way and is not appropriate for use as a vehicular to the site.</li> </ul>		

<b>PC91</b>		
<b>WHSAP Page/Paragraph/Table:</b>	Paragraph 5.110	
<b>Reason for proposed change:</b>	To reflect the resolution of Wiltshire Council's Cabinet, reference to vehicular access being taken from Farrells Field is proposed to be removed from paragraph 5.110.	
<b>Proposed change:</b>	Amend text to read: "...on site would provide screening to reduce the effect on adjacent visual receptors and be in keeping with the existing landscape character. <del>Access would be taken from Farrell Fields and t</del> The possibility to link to adjacent footpaths should be explored."	
No. of responses received:	1	
<b>Comment ID No.</b>	<b>Consultee ID</b>	<b>Agent ID</b>
<b>474</b>	983136	N/A
<b>Summary of comments received:</b>		
<ul style="list-style-type: none"> <li>• No objection to Proposed Change to delete sentence stating that access to the site would be taken from Farrells Field.</li> <li>• The agent's discussions with representatives of Yatton Keynell Parish Council as well as consultation with the local community have resulted in a preference for the site to be accessed via a new junction directly onto the main road (the B4039 to the north). Persimmon Homes has committed to this alternative access arrangement and are preparing a detailed planning application for the development of the site which identifies a vehicular access directly onto the B4039.</li> </ul>		

<b>PC92</b>	
<b>WHSAP Page/Paragraph/Table:</b>	Housing Allocation H2.13
<b>Reason for proposed change:</b>	To reflect the resolution of Wiltshire Council's Cabinet, the site at Crudwell is proposed to be deleted from the WHSAP. The reason for this is that in the wider context of completions that have already occurred in the Malmesbury CA over the WCS Plan period, there is no longer a strategic need to allocate a site in the community area through the WHSAP. Given that good progress has been made on the preparation of the Crudwell Neighbourhood Plan, which seeks to allocate sites, evidence indicates that the council can defer housing allocation options to be developed through the emerging neighbourhood plan, rather than through the WHSAP process.
<b>Proposed change:</b>	Delete section titled 'Malmesbury Community Area Remainder' and 'H2.13 Ridgeway Farm, Crudwell'; delete site boundary map at Figure 5.17; delete paragraphs 5.111 to 5.114. Renumber subsequent paragraphs.
<b>No. of responses received:</b>	49

<b>Comment ID No.</b>	<b>Consultee ID</b>	<b>Agent ID</b>
3	1184120	N/A
4	1184109	N/A
5	1125644	N/A
6	1184115	N/A
7	1184194	N/A
8	1184377	N/A
9	1184586	N/A
10	1184879	N/A
11	1185083	N/A
12	126672	N/A
26	1129633	N/A
28	1185606	N/A
29	1185678	N/A
30	1135102	N/A
37	1186289	N/A
39	1134604	N/A
40	1135864	N/A
41	1130479	N/A
42	1124620	N/A
56	1186982	N/A
95	1130710	N/A
176	1187846	N/A
238	1187696	N/A
239	1187701	N/A

241	1187701	N/A
267	1126295	N/A
268	1134553	N/A
271	1129610	N/A
272	1128343	N/A
274	1131243	N/A
297	1187739	N/A
302	1187922	N/A
335	1187762	N/A
339	1135814	N/A
341	1133304	N/A
367	1187773	N/A
382	1187777	N/A
385	1187779	N/A
413	1187847	N/A
415	1132247	N/A
418	1187850	N/A
421	1187855	N/A
422	1187433	N/A
444	1135849	N/A
446	1134691	1134691
465	1132949	N/A
495	1187943	N/A
527	1187981	N/A
528	1187985	N/A

**Summary of comments received:**

- Crudwell Parish Council and Crudwell Neighbourhood Plan Steering Group fully supports PC92 and would like to restate its previous comments that decisions of this type are best made at a local level with the support of the community.
- There is no Strategic Need for Wiltshire to allocate housing in Crudwell because supply in the Housing Market Area is good.
- The Neighbourhood Plan is progressing extremely well and is planning to allocate land to meet identified needs.
- The council's and Government's Localism agenda is best served by allowing the Parish to determine its own future.
- The Wiltshire Core Strategy states that development in Large Villages should be limited to small scale sites to meet local needs.
- The proposed deletion of the site may lead to potential conflicts with the WCS in terms of housing land supply expectations.
- Concern about local surface water drainage capacity associated with the proposed allocation.
- Concerns over highways safety and increased traffic/congestion associated with the proposed allocation.
- Disproportionate levels of growth being applied to village locations in the North and West Wiltshire HMA.
- Lack of footway connection between the site and the heart of the village is a

concern.

- Concern over lack of local employment opportunities in the village and surrounding area.
- If required, development should be on the east side of village
- The removal of the site was purely a political decision without appropriate evidence to justify that decision.
- Significant questions must be asked as to how much progress has been made with the Crudwell Neighbourhood Plan, and as such, no weight can be given to the Neighbourhood Plan at this stage.
- Neighbourhood Plans that are at an early stage should not dictate the overall strategy for strategic plan making within Wiltshire (Planning Practice Guidance and NPPF).
- The council is unable to demonstrate a 5-year housing land supply in the North and West Wiltshire Housing Market Area beyond 2024. Questions are already being raised over the level of existing housing land supply, a point argued in a recent appeal (APP/Y3940/W/17/3187915). When considered in the light of the incoming Standard Methodology for calculating Housing Supply significant questions on whether the housing requirements for the Malmesbury Community Area can be met would need to be addressed by the council through the examination process in order to demonstrate that the removal of the Crudwell site is sound.
- Housing figures for Community Areas in the Wiltshire Core Strategy are expressed as 'indicative' requirements and are not a cap on development.
- It has been demonstrated through the submission of a planning application that 'Land at Ridgeway Farm' is deliverable and there are no technical matters which prevent the site coming forward in the short term.
- We (the agents acting for the developer) have made previous representations on the Housing Sites Allocations Plan and we would be grateful if these representations together with all previous submissions are taken into account by the Inspector.

<b>PC94</b>		
<b>WHSAP Page/Paragraph/Table:</b>	Paragraph 5.116	
<b>Reason for proposed change:</b>	In response to comments received raising concerns about the density of development. Subsequent discussion with promoters of the site suggests that the developable capacity should be reduced to 35 dwellings to allow for a more sensitively designed development.	
<b>Proposed change:</b>	Amend first sentence of paragraph 5.116 to read: "Approximately 1.35ha of land at Court Orchard/ Cassways is allocated for the development of approximately <del>35</del> 40 dwellings, as identified on the Policies Map."	
<b>No. of responses received:</b>	127	
<b>Comment ID No.</b>	<b>Consultee ID</b>	<b>Agent ID</b>
92	901952	901806
109	1125255	N/A
112	1187385	N/A
115	1187391	N/A
117	1124313	N/A
122	1185926	N/A
178	704997	N/A
200	703547	N/A
201	704447	N/A
205	1123635	N/A
206	1137557	N/A
207	1187618	N/A
208	1187622	N/A
209	1126059	N/A
210	1187624	N/A
211	1187625	N/A
212	1187627	N/A
213	1125387	N/A
214	1126317	N/A
215	1187629	N/A
216	1187630	N/A
218	1187632	N/A
219	704174	N/A
220	1125357	N/A
221	1187633	N/A
222	704184	N/A
223	706349	N/A
224	1187637	N/A
231	1187642	N/A
233	1187644	N/A



<b>234</b>	1187645	N/A
<b>236</b>	1129817	N/A
<b>240</b>	1187707	N/A
<b>242</b>	1187708	N/A
<b>243</b>	1187709	N/A
<b>246</b>	1129546	N/A
<b>249</b>	704825	N/A
<b>250</b>	1187713	N/A
<b>253</b>	1187717	N/A
<b>257</b>	705001	N/A
<b>275</b>	706300	N/A
<b>276</b>	1187385	N/A
<b>278</b>	1125693	N/A
<b>283</b>	1187735	N/A
<b>286</b>	1187741	N/A
<b>287</b>	640295	N/A
<b>288</b>	1187743	N/A
<b>289</b>	1187746	N/A
<b>290</b>	1187747	N/A
<b>291</b>	1187748	N/A
<b>292</b>	1187750	N/A
<b>293</b>	1187751	N/A
<b>294</b>	1187752	N/A
<b>295</b>	645824	N/A
<b>301</b>	1187740	N/A
<b>304</b>	1187740	N/A
<b>305</b>	646571	N/A
<b>313</b>	1187749	N/A
<b>314</b>	703786	N/A
<b>317</b>	1133437	N/A
<b>318</b>	1187756	N/A
<b>319</b>	1187766	N/A
<b>320</b>	1187769	N/A
<b>321</b>	1187772	N/A
<b>323</b>	1131542	N/A
<b>326</b>	1187755	N/A
<b>327</b>	1187759	N/A
<b>328</b>	701404	N/A
<b>333</b>	1187760	N/A
<b>334</b>	1187761	N/A
<b>338</b>	1187768	N/A
<b>343</b>	1187770	N/A
<b>369</b>	1126734	N/A
<b>380</b>	1187776	N/A

<b>381</b>	703945	N/A
<b>389</b>	1187830	N/A
<b>400</b>	1126678	N/A
<b>402</b>	1187843	N/A
<b>405</b>	701132	N/A
<b>406</b>	710498	N/A
<b>407</b>	704026	N/A
<b>408</b>	703974	N/A
<b>409</b>	1187845	N/A
<b>417</b>	1187849	N/A
<b>420</b>	1187854	N/A
<b>423</b>	1187859	N/A
<b>424</b>	1187860	N/A
<b>425</b>	1187862	N/A
<b>426</b>	1187864	N/A
<b>429</b>	1187771	N/A
<b>457</b>	1187830	N/A
<b>475</b>	1187935	N/A
<b>476</b>	1187937	N/A
<b>477</b>	1125220	N/A
<b>478</b>	1187939	N/A
<b>479</b>	1187940	N/A
<b>480</b>	1187949	N/A
<b>482</b>	1126224	N/A
<b>483</b>	1187933	N/A
<b>484</b>	1126766	N/A
<b>485</b>	706361	N/A
<b>496</b>	705060	N/A
<b>497</b>	118745	N/A
<b>499</b>	704746	N/A
<b>501</b>	1187950	N/A
<b>503</b>	1187951	N/A
<b>504</b>	1187952	N/A
<b>505</b>	1122130	N/A
<b>506</b>	1187954	N/A
<b>507</b>	1187955	N/A
<b>508</b>	1187956	N/A
<b>509</b>	1187957	N/A
<b>510</b>	1187958	N/A
<b>511</b>	1187957	N/A
<b>512</b>	1126215	N/A
<b>514</b>	1187959	N/A
<b>515</b>	1187961	N/A
<b>517</b>	704313	N/A

<b>518</b>	1187964	N/A
<b>520</b>	704614	N/A
<b>521</b>	1187965	N/A
<b>522</b>	1125789	N/A
<b>523</b>	1187966	N/A
<b>524</b>	708592	N/A
<b>525</b>	1187968	N/A
<b>535</b>	1188071	N/A
<b>536</b>	1188071	N/A

**Summary of comments received:**

- The landowner supports the Proposed Change in principle. The site remains available for residential development. The revision to the quantum of development is supported. It is requested that the area of the proposed allocation is amended to include additional land to the western boundary for site drainage and landscape mitigation. The site could be built by the end of 2021.
- There is not a strategic need for the number of home proposed at Bratton.
- The site is too small for 35 dwellings.
- The emerging neighbourhood plan should be allowed to progress and allocate an alternative site that is preferred by the local community.
- An alternative site should be allocated inside the settlement boundary / brownfield land.
- Concern that site 738 is also allocated for development.
- Within the Westbury Community Area there is an oversupply of homes.
- Concern that once allocated, a prospective developer will then apply for a greater number of homes.
- Concern that the development would set precedent for further development of surrounding fields.
- Development at large villages should not exceed 10 dwellings.
- The proposed reduction of 5 dwellings does not resolve concerns over landscape impacts, highways impacts and safety, harm to character of the village, heritage concerns, impacts on wildlife habitat, lack of employment opportunities, added pressure on local services, overloading of sewage pumping station, flood risk and drainage, light/noise pollution, inadequate public transport, loss of agricultural land, broadband speed, reduced house values, and disruption to local residents.
- Affordable housing is needed in the village, but that does not justify the allocation of this site.
- There are errors in the council's assessment of available facilities at Bratton.
- There are errors in the census figures for number of dwellings in Bratton.
- The proposed allocation does not consider fragility of water supply / water pressure.
- Previous planning applications on the site have been refused.

<b>PC99</b>		
<b>WHSAP Page/Paragraph/Table:</b>	Para 5.129	
<b>Reason for proposed change:</b>	Factual update: Amend incorrect reference to '70m contour' and to reflect the latest housing land supply statement published March 2018 (base date April 2017)	
<b>Proposed change:</b>	Amend 2nd and 3 <sup>rd</sup> sentences of paragraph 5.129 to read: "All built development will be below the <b>75</b> 70m contour and a scheme will include a country park and extensive planting. Development of this site represents necessary growth to support the delivery of housing at Salisbury and thereby <b>contribute towards</b> maintain a 5-year housing land supply position within the South Wiltshire Housing Market Area."	
No. of responses received:	1	
<b>Comment ID No.</b>	<b>Consultee ID</b>	<b>Agent ID</b>
<b>170</b>	1013209	1146294
<b>Summary of comments received:</b>		
<ul style="list-style-type: none"> <li>• Development encroaching above the 70-metre contour would have an adverse effect on the approach and landscape setting of Salisbury along Netherhampton Road</li> <li>• The ability for built development to encroach above the 70-metre contour would fail to have full regard to the Stage 4a Site Landscape Assessment.</li> <li>• There are no comments similar to PC104 concerning the historic setting of Salisbury and its Cathedral.</li> </ul>		

<b>PC100</b>		
<b>WHSAP Page/Paragraph/Table:</b>	Para 5.136	
<b>Reason for proposed change:</b>	Factual update: The refresh of the Salisbury Transport Strategy has taken place so text needs to reflect this.	
<b>Proposed change:</b>	Amend third sentence to read: "To address such matters, dialogue with Highways England will be required and work would take place in conjunction with a refresh of the Salisbury Transport Strategy <b><u>Refresh (2018).</u></b> "	
No. of responses received:	2	
<b>Comment ID No.</b>	<b>Consultee ID</b>	<b>Agent ID</b>
<b>184</b>	903251	N/A
<b>416</b>	466628	N/A
<b>Summary of comments received:</b>		
<ul style="list-style-type: none"> <li>• Highways England confirms that a refresh of the Salisbury Transport Strategy has taken place in dialogue with Highways England.</li> <li>• Highways England welcomes these updates to the WHSAP which strengthen the requirement for proposals to be supported by appropriate transport assessment and mitigation necessary to ensure that impact on the Strategic Road Network (SRN) is not severe.</li> <li>• Highways England has worked collaboratively with the council to refresh the Salisbury Transport Strategy which sets out a package of high-level highways and transport interventions to improve accessibility and support growth and development across the city.</li> <li>• In parallel to the Salisbury Transport Strategy refresh and recognising particular constraints at A36 Southampton Road, Highways England is progressing a study to identify potential options to improve the existing performance and operation of this link and to help to facilitate growth aspirations across the City.</li> <li>• Highways England is working closely with the council in the development of this study, which will dovetail with the Salisbury Transport Strategy. The study is due to conclude in early 2019.</li> <li>• Both highway authorities recognise the challenges of the existing and predicted situations resulting from growth along the A36T through Salisbury. Highways England welcome the opportunity to continue to work with the council to further develop a joint understanding of the issues, problems and limitations of the existing network.</li> <li>• Traffic has increased enormously along the A3094 Netherhampton Road, particularly heavy lorries. Structurally the road is not suited to the heavyweight vehicles constantly using it. Added car movements and construction traffic will compound this.</li> <li>• The A3094 road is used as an unofficial by pass to Salisbury.</li> <li>• The Salisbury Transport Strategy Refresh 2018 acknowledges that there is little that can be done at the Park Wall end and that only some minor adjustments can be made at the Harnham Gyratory end of the A3094.</li> <li>• It is not guaranteed that the Netherhampton Rd sites will be well served by public transport.</li> <li>• The Netherhampton Road sites should include a doctor's surgery.</li> <li>• Tinkering with roads, adding cycle paths etc will not remove the unsuitability</li> </ul>		

of the A3094 without major commitment to the road network, access problems and more importantly doctor surgeries, shops and leisure outlets.

- I would not object to the Netherhampton Road sites if a smaller development of rentable council or housing association homes came forward for those on the council waiting list.
- All developments must provide proper facilities to avoid car dependence - development on the proposed scale without these facilities and road improvements such as a bypass will only add to the existing problems
- Suggest that construction traffic to the Netherhampton sites should only allowed from Park Wall end of A3094.

<b>PC102</b>		
<b>WHSAP Page/Paragraph/Table:</b>	Housing Allocation H3.1	
<b>Reason for proposed change:</b>	For clarity: To give further clarification regarding any approval of a masterplan for the site, to be consistent with text of other policies where a masterplan is required.	
<b>Proposed change:</b>	Amend final sentence of Housing Allocation H3.1 to read: “Development will take place in accordance with a masterplan for the site approved by the Council <b><u>as part of the planning application process.</u></b> ”	
No. of responses received:	1	
<b>Comment ID No.</b>	<b>Consultee ID</b>	<b>Agent ID</b>
<b>315</b>	420889	N/A
<b>Summary of comments received:</b>		
<ul style="list-style-type: none"> <li>Bovis have considered the various Main Modifications in respect of Salisbury and note there are no Main Modifications which affect either of the site allocations under Policies H3.1 and H3.3</li> </ul>		

<b>PC104</b>			
<b>WHSAP Page/Paragraph/Table:</b>	Replace para 5.144 with new text		
<b>Reason for proposed change:</b>	Improve clarity. To address the comments submitted by Historic England and reflect the advice set out in Council Heritage Impact Assessment. Additional weight to be given to heritage assets.		
<b>Proposed change:</b>	Replace paragraph 5.144 as follows: “The area is sensitive in terms of the setting to the Cathedral and views towards it. Open space along the southern boundary will maintain views of the Cathedral spire travelling east. Design and layout taking account of a Heritage Impact Assessment would be capable of preventing development from having a harmful influence. Proposals would need to provide for a high quality, sustainable development that enhances an important approach to the City and provides links to nearby public rights of way.” <b><u>“Long views to the historic City of Salisbury and Salisbury Conservation Area including the spire of Salisbury Cathedral (Grade I listed) are available across the site from the A3094, and at closer range from within the site itself. At the planning application stage, the layout and design of the site would need to give great weight to conserving the significance of these heritage assets and their setting. Development proposals would need to be sensitively designed to ensure that views of the Spire are not significantly compromised. Design and layout would also need to positively address the objectives of the City of Salisbury Conservation Area Appraisal and Management Plan to minimise harm. Proposals would therefore need to provide for high quality, sustainable development that enhances an important approach to the City and provides links to nearby rights of way.”</u></b>		
No. of responses received:	2		
<b>Comment ID No.</b>	<b>Consultee ID</b>	<b>Agent ID</b>	
171	1013209	1146294	PC10
190	403792	N/A	PC10
<b>Summary of comments received:</b>			
<ul style="list-style-type: none"> <li>• By reason of the sensitivity of this site for the setting of historic Salisbury, the heritage assessment should already have been undertaken to determine what the capacity of the land might be to accommodate development.</li> <li>• Consider that the belated preparation of the Heritage Impact Assessment (HIA) is seeking to justify the allocation after a decision has been taken rather than informing the assessment process.</li> <li>• The HIA identifies the very real and significant harm development on Land North of Netherhampton Road would cause to important heritage assets.</li> <li>• If site is to be retained, what is this site’s real capacity to accommodate built development without causing the significant harm to designated heritage assets as identified in the HIA.</li> </ul>			



- Object to the inadequacy of PC104 to address the real heritage concerns.
- Historic England welcome the proposed modifications that seek to ensure due regard is had to conserving the significance of the affected heritage assets and their settings.
- This is an important site in relation to the integrity of historic Salisbury, its Cathedral and the wider landscape setting.
- There is some doubt that a scheme could accord with the objectives of the Plan, the site-specific conditions, national policy and guidance in respect of the great weight that needs to be afforded the conservation of affected heritage assets and their setting, primarily in this respect, Salisbury Cathedral.
- Further evidence needs to be prepared and submitted to council to provide reasonable confidence that a scheme could be forthcoming that delivers a satisfactory housing development whilst protecting heritage assets. Historic England await the outcome of such further work before the proposed allocation can be considered appropriate.
- The Plan should also make clear how this area of archaeological sensitivity should be addressed.

<b>PC105</b>		
<b>WHSAP Page/Paragraph/Table:</b>	Paragraph 5.143	
<b>Reason for proposed change:</b>	Improve clarity. Insert additional wording to address concerns raised by the Environment Agency, highlighting the need to address flood risk and drainage for all development sites.	
<b>Proposed change:</b>	Amend to read: “Land north of Netherhampton Road is allocated for the development of approximately 100 dwellings on 5.6ha of land as shown on the Policies Map. It is reasonably well located with regard to services and facilities. The site is well contained in terms of visual impacts on the wider landscape. <del>The extent of possible flood risks areas will need to be carefully surveyed so that development avoids them. A detailed flood risk assessment would be required in order to identify a set of appropriate sustainable drainage measures.</del> <b><u>Part of the site lies within Flood Zone 2 and hence development proposals will need to be sequentially planned and supported by a Flood Risk Assessment (incorporating an assessment of the predicted effects of climate change). In addition, development proposals will need to be supported by a comprehensive drainage strategy to address issues of surface water flooding.</u></b> ”	
No. of responses received:	1	
<b>Comment ID No.</b>	<b>Consultee ID</b>	<b>Agent ID</b>
172	1013209	1146294
<b>Summary of comments received:</b>		
<ul style="list-style-type: none"> <li>Concerns regarding the suitability and appropriateness of allocating land North of Netherhampton Road for housing development.</li> <li>Due to the sensitivity of this site for the setting of Salisbury, a detailed landscape assessment should already have been undertaken to determine what the capacity of the land might be to accommodate development.</li> </ul>		

<b>PC106</b>		
<b>WHSAP Page/Paragraph/Table:</b>	Paragraph 5.145	
<b>Reason for proposed change:</b>	For clarity, in response to comments from Highways England.	
<b>Proposed change:</b>	Insert text at the end of paragraph 5.145: <u><b>“Transport assessment will be required to support any planning application and provision made for transport network improvements necessary to accommodate the scale of development.”</b></u>	
No. of responses received:	1	
<b>Comment ID No.</b>	<b>Consultee ID</b>	<b>Agent ID</b>
<b>185</b>	903251	N/A
<b>Summary of comments received:</b>		
<ul style="list-style-type: none"> <li>• Highways England welcomes these updates to the WHSAP which strengthen the requirement for proposals to be supported by appropriate transport assessment and mitigation necessary to ensure that impact on the SRN is not severe.</li> <li>• Highways England has worked collaboratively with the council to refresh the Salisbury Transport Strategy which sets out a package of high-level highways and transport interventions to improve accessibility and support growth and development across the city.</li> <li>• Both highway authorities recognise the challenges of the existing and predicted situations resulting from growth along the A36T through Salisbury.</li> <li>• Highways England welcome the opportunity to continue to work with the council to further develop a joint understanding of the issues, problems and limitations of the existing network.</li> </ul>		

<b>PC109</b>		
<b>WHSAP Page/Paragraph/Table:</b>	Para 5.148	
<b>Reason for proposed change:</b>	For clarity. Amend paragraph to add clarity regarding landscaping and open space requirements, as stated in the TEP Landscape Assessment.	
<b>Proposed change:</b>	Amend paragraph 5.148 to read: “This is a sloping and quite prominent site. In combination with Heritage Impact Assessment, development will need to take place within a strong landscape framework that maintains and enhances the existing woodland belts affecting the site. Containment provided by the beech shelterbelt on the southern boundary should extend as a green corridor from the end of the shelterbelt eastwards towards the existing Rowbarrow housing development and woodland around the Milk & More Salisbury Depot. <b><u>This green corridor should include copses, groups of trees and individual specimen trees. The arrangement of any proposed development and open space on the site should</u></b> This would provide a setting for public rights of way in the area and maintain their views of the Salisbury cathedral spire <b><u>and this could be achieved through careful street alignment and locating open space in the southern part of the site. The sloping buffer of land on the northern edge of the site should be enhanced with tree planting and the landscape buffer along Rowbarrow (road) retained.</u></b> ”	
No. of responses received:	1	
<b>Comment ID No.</b>	<b>Consultee ID</b>	<b>Agent ID</b>
<b>173</b>	1013209	1146294
<b>Summary of comments received:</b>		
<ul style="list-style-type: none"> <li>• Object to the principle of the Rowbarrow housing allocation.</li> <li>• PC109 confirms the concerns raised relating to landscape and ecological matters are important material considerations.</li> <li>• No clear evidence that this allocation can address these matters notwithstanding PC109.</li> </ul>		

<b>PC110</b>		
<b>WHSAP Page/Paragraph/Table:</b>	Paragraph 5.147	
<b>Reason for proposed change:</b>	Improve clarity. To reflect the advice provided by Historic England.	
<b>Proposed change:</b>	Amend paragraph to read: Development will need to preserve the contribution made by the site to the setting and therefore the importance of the Woodbury Ancient Villages Scheduled Monument. If necessary land will need to be set aside from development. <b><i>In line with national policy, detailed design and layout will be guided by an assessment of heritage assets and their significance (including the contribution made by their setting).</i></b> Heritage Impact Assessment. Scheduled monument consent will be required. The site also has high archaeological potential.	
<b>No. of responses received:</b>	1	
<b>Comment ID No.</b>	<b>Consultee ID</b>	<b>Agent ID</b>
<b>174</b>	1013209	1146294
<b>Summary of comments received:</b>		
<ul style="list-style-type: none"> <li>• PC110 fails to address the real and significant heritage concerns associated with Rowbarrow</li> <li>• No clear evidence that development could occur within the allocation without significant detriment to the setting of the Scheduled Monument (SM).</li> <li>• Unfathomable why the Heritage Impact Assessment does not include any assessment of the proposed Rowbarrow allocation.</li> </ul>		

<b>PC111</b>	
<b>WHSAP Page/Paragraph/Table:</b>	New site Housing Allocation H3.5
<b>Reason for proposed change:</b>	To include Omission Site OM003 The Yard, Hampton Park, Salisbury following consideration through site selection process (See Salisbury Community Area Topic Paper, May 2018).
<b>Proposed change:</b>	<p>After paragraph 5.149 add in new site allocation, as set out below.</p> <p>Insert heading:  <b><u>"H3.5 The Yard, Hampton Park, Salisbury"</u></b></p> <p>Then insert site allocation figure as set out in <b>Annex I</b>;          And insert following new paragraphs after.</p> <p>New para:  <b><u>"The Yard, Hampton Park is allocated for the development of approximately 14 dwellings on approximately 1.31 ha of land as shown on the Policies Map. The site lies adjacent to the settlement boundary and existing residential development, and would deliver a relatively small number of dwellings to help contribute towards the overall remaining indicative housing requirement for Salisbury."</u></b></p> <p>New para:  <b><u>"The site has previously been used for agricultural storage purposes, is fairly flat, and comprises small parcels of rough grassland and a large disused agricultural storage building. Access to the site would be achieved via Neal Close."</u></b></p> <p>New para:  <b><u>"This site is within the Special Landscape Area and in a rural fringe setting, adjacent to the Country Park. Access to the Country Park should be provided from this site and a robust landscape strategy and infrastructure is required to allow any development to appear as a natural extension to Hampton Park."</u></b></p> <p>New para:  <b><u>"Hedgerows around the site have the potential to be of importance for bat commuting and should be maintained where possible. There is a high population of slow worms to be translocated off site, which may be within the adjacent Country Park or other suitable location. Given the potential scale of the translocation, any receptor site will need to provide suitable habitat conditions for the species. Consideration also needs to be given to the site's potential use as a roost site for barn owls."</u></b></p> <p>New para:</p>

	<b><u>“As this site has previously been used for agricultural storage purposes, an assessment of the history and current condition of the site to determine the likelihood of the existence of contamination arising from previous uses should be carried to inform the planning application.”</u></b>	
No. of responses received:	1	
<b>Comment ID No.</b>	<b>Consultee ID</b>	<b>Agent ID</b>
<b>432</b>	555472	N/A
<b>Summary of comments received:</b>		
<ul style="list-style-type: none"> <li>• The Environment Agency have no objection to the addition of this site.</li> </ul>		

<b>PC114</b>		
<b>WHSAP Page/Paragraph/Table:</b>	Figure 5.23; Paragraph 5.153	
<b>Reason for proposed change:</b>	Factual update. Amend site boundary to reflect boundary correction	
<b>Proposed change:</b>	Amend the boundary of the allocation as set out in <b>Annex J</b> . And amend first sentence of paragraph 5.153 to read: "Approximately <del>1.9</del> 4.8ha of land to the north of Clover Lane, Durrington is allocated for the development of approximately 45 dwellings, as identified on the Policies Map."	
No. of responses received:	1	
<b>Comment ID No.</b>	<b>Consultee ID</b>	<b>Agent ID</b>
<b>204</b>	1187599	894742
<b>Summary of comments received:</b>		
<ul style="list-style-type: none"> <li>• Owners of site H3.6 take the position that the council's assessment of housing land supply was not sound at the time of submitting the draft Plan and therefore the allocation should be further increased in area, with a corresponding increase in number of dwellings (from 45 to 110).</li> </ul>		



<b>PC119</b>		
<b>WHSAP Page/Paragraph/Table:</b>	Paragraph 6.3	
<b>Reason for proposed change:</b>	Improve clarity in line with the Settlement Boundary Review Methodology.	
<b>Proposed change:</b>	Amend footnote 22, as follows: “Settlement boundaries have been updated to take account of implemented planning permissions <del>since</del> <b>up to</b> April 2016 <b>2017</b> .”	
No. of responses received:	1	
<b>Comment ID No.</b>	<b>Consultee ID</b>	<b>Agent ID</b>
<b>47</b>	841197	397761
<b>Summary of comments received:</b>		
<ul style="list-style-type: none"> <li>• The settlement boundaries (of Calne, Melksham and Westbury) have not been updated to reflect the changes Pegasus proposed in response to the consultation on the Pre-Submission Draft, therefore the statement in the focused changes is inaccurate. The settlement boundaries do not reflect implemented planning permissions up to 2017.</li> <li>• In some cases, Settlement Boundaries are clearly out of date and do not reflect recent planning permissions, therefore fail to meet the requirements of the WCS.</li> <li>• The revised settlement boundaries proposed for Melksham, Westbury and Calne are not up to date and do not reflect recent planning permissions to RHL references 15/12454, 14/09262/OUT, 14/11179/OUT land at Prince Charles Drive, Calne respectively and also land at Low Lane Calne (LPA reference 17/00679/OUT).</li> <li>• The settlement boundary of Melksham should be revised to reflect planning permission 15/12454 land to the north of Sandridge Common, Sandridge Road, Melksham, where development has started.</li> <li>• The settlement boundary of Westbury should be revised to reflect planning permission 14/09262 which was granted on appeal in July 2016 (300 dwellings, land north of Bitham Park, Trowbridge Road, Westbury) which has started. It is noted that the proposed new settlement boundary includes land to the west of Trowbridge Road which was granted permission and is under construction (220 dwellings 13/03568), but not land to the east of Trowbridge Road.</li> <li>• Recent planning permissions on land at Prince Charles Drive (14/11179 for 130 dwellings) and land at Low Lane Calne (17/00679 for 165 dwellings) are not reflected in the changes to the settlement boundary. Building has commenced on Land at Prince Charles Drive.</li> <li>• What harm would there be to the settlement strategy of updating the settlement boundary to reflect the recent planning permissions in addition to those under construction? These sites are after all considered against the housing supply and are consistent with the settlement strategy and are in some cases under construction.</li> </ul>		

<b>SBR PC1</b>		
<b>Name of settlement:</b>	Market Lavington	
No. of responses received:	1	
<b>Comment ID No.</b>	<b>Consultee ID</b>	<b>Agent ID</b>
85	924012	N/A
<b>Summary of comments received:</b>		
<ul style="list-style-type: none"> <li>• Support for the Proposed Change.</li> </ul>		

<b>SBR PC5</b>		
<b>Name of settlement:</b>	Marlborough	
No. of responses received:	1	
<b>Comment ID No.</b>	<b>Consultee ID</b>	<b>Agent ID</b>
<b>498</b>	1138628	1187946
<b>Summary of comments received:</b>		
<ul style="list-style-type: none"> <li>Support Proposed Change in relation to Marlborough College's land, at map grid references F8, G8, G9, I8, H8 and H9, and the open space at College Fields, at map grid references E7, F6 and F7, within the Marlborough settlement boundary.</li> </ul>		

<b>SBR PC7</b>		
<b>Name of settlement:</b>	Baydon	
No. of responses received:	1	
<b>Comment ID No.</b>	<b>Consultee ID</b>	<b>Agent ID</b>
<b>383</b>	1184289	N/A
<b>Summary of comments received:</b>		
<ul style="list-style-type: none"> <li>• Objection to inclusion of houses, at map grid references F7 and G7, within the Baydon settlement boundary. This is contrary to the methodology as it includes land and buildings detached from the village. This site has been continuously refused development including a dismissed appeal because it is separate from the village in the open countryside.</li> </ul>		

<b>SBR PC8</b>		
<b>Name of settlement:</b>	Ramsbury	
No. of responses received:	1	
<b>Comment ID No.</b>	<b>Consultee ID</b>	<b>Agent ID</b>
<b>394</b>	906566	N/A
<b>Summary of comments received:</b>		
<ul style="list-style-type: none"> <li>Proposed change should include the rest of the curtilage of the property known as Anvil Cottage, at map grid reference J7, within the Ramsbury settlement boundary.</li> </ul>		

<b>SBR PC14</b>		
<b>Name of settlement:</b>	Hullavington	
No. of responses received:	4	
<b>Comment ID No.</b>	<b>Consultee ID</b>	<b>Agent ID</b>
<b>110</b>	1182626	N/A
<b>111</b>	1182626	N/A
<b>299</b>	1133384	1128217
<b>303</b>	162663	N/A
<b>Summary of comments received:</b>		
<ul style="list-style-type: none"> <li>• Objection to the removal of an area of land, at map grid reference J6 and J7, from within the Hullavington settlement boundary. Argues that this repeats a previous objection made during the consultation on the pre-submission draft Plan that has not been received/ recorded by the council.</li> <li>• Support the inclusion of the school playing fields, at map grid reference J4 and J5, within the Hullavington settlement boundary.</li> <li>• Include land adjacent to the public house, at map grid reference H7, within the Hullavington settlement boundary. This would be an opportunity for infill development. There is a planning application currently being considered on this site (18/09895/FUL).</li> </ul>		

<b>SBR PC16</b>		
<b>Name of settlement:</b>	Yatton Keynell	
No. of responses received:	1	
<b>Comment ID No.</b>	<b>Consultee ID</b>	<b>Agent ID</b>
<b>322</b>	1126488	N/A
<b>Summary of comments received:</b>		
<ul style="list-style-type: none"> <li>Object to proposed change to include part of curtilage of the property, at map grid reference J8, within the Yatton Keynell settlement boundary. The existing settlement boundary correctly reflects the property line and the proposed change would include land more correctly described as a paddock. The representation to include this land is an attempt to circumvent a rejection of proposals to build a single dwelling on this land.</li> </ul>		

<b>SBR PC17</b>		
<b>Name of settlement:</b>	Corsham	
No. of responses received:	1	
<b>Comment ID No.</b>	<b>Consultee ID</b>	<b>Agent ID</b>
<b>401</b>	556491	901380
<b>Summary of comments received:</b>		
<ul style="list-style-type: none"> <li>Support inclusion of new residential development south of Potley Lane, at map grid reference F11, G11 and F12, within the Corsham settlement boundary.</li> </ul>		



<b>SBR PC19</b>		
<b>Name of settlement:</b>	Crudwell	
No. of responses received:	2	
<b>Comment ID No.</b>	<b>Consultee ID</b>	<b>Agent ID</b>
<b>104</b>	862330	N/A
<b>447</b>	1134691	1134691
<b>Summary of comments received:</b>		
<ul style="list-style-type: none"> <li>• Include additional land associated with the property known as Ravenscroft, at map grid references I6 and J6, within the Crudwell settlement boundary.</li> <li>• Support inclusion of linear development along Tetbury Lane, at map grid reference at G6 and H6, within the Crudwell settlement boundary.</li> </ul>		

<b>SBR PC21</b>		
<b>Name of settlement:</b>	Seend	
No. of responses received:	1	
<b>Comment ID No.</b>	<b>Consultee ID</b>	<b>Agent ID</b>
<b>395</b>	448943	1187838
<b>Summary of comments received:</b>		
<ul style="list-style-type: none"> <li>• Objection to proposed change to exclude the car park of the former Bell Inn, at map grid reference F8 and G8, from within the Seend settlement boundary. This is previously developed land and a small development of 2-3 bedroom houses would help meet housing need at this settlement. Its exclusion would be contrary to the NPPF and its strategic objectives of building resilient communities.</li> </ul>		

<b>SBR PC26</b>		
<b>Name of settlement:</b>	Trowbridge	
No. of responses received:	1	
<b>Comment ID No.</b>	<b>Consultee ID</b>	<b>Agent ID</b>
<b>229</b>	1187638	894742
<b>Summary of comments received:</b>		
<ul style="list-style-type: none"> <li>• Objection to removal of land, at map grid references H3, H4, I3 and I4, from within the Trowbridge settlement boundary. This is ad hoc residential/amenity land at the edge of a settlement that relates more closely to the built environment. The boundary should follow, but not include, the clearly defined physical feature of the railway line.</li> </ul>		

<b>SBR PC27</b>		
<b>Name of settlement:</b>	Hilperton	
No. of responses received:	4	
<b>Comment ID No.</b>	<b>Consultee ID</b>	<b>Agent ID</b>
<b>2</b>	1054315	N/A
<b>34</b>	1183327	N/A
<b>54</b>	1138113	899110
<b>55</b>	1186831	N/A
<b>Summary of comments received:</b>		
<ul style="list-style-type: none"> <li>• Discrepancy between wording of the proposed change and the accompanying map; the latter does not reflect the proposed change to the settlement boundary in relation to map grid references M9, N8, N9, O8, P8 and O9.</li> <li>• Settlement boundary does not include the rural hamlet of Whaddon, within the parish boundary. Housing need for young and elderly people needs to be considered for this settlement.</li> <li>• Include Land at the Grange and land immediately to the east within the Hilperton settlement boundary. The former has planning permission for 15 dwellings and there is also a current application for 20 dwellings. The latter has planning permission for 15 dwellings. Their inclusion will ensure that the principle of residential development on this land is acceptable and help to meet housing need.</li> <li>• Settlement boundary does not include the full extent of the property at Maxwell House, Maxcroft Lane, Hilperton Marsh, at grid references F3 and G3.</li> </ul>		

<b>SBR PC28</b>		
<b>Name of settlement:</b>	North Bradley	
No. of responses received:	1	
<b>Comment ID No.</b>	<b>Consultee ID</b>	<b>Agent ID</b>
<b>120</b>	391306	N/A
<b>Summary of comments received:</b>		
<ul style="list-style-type: none"> <li>• Support Proposed Change SBR PC28 to the North Bradley settlement boundary.</li> </ul>		

<b>SBR PC29</b>		
<b>Name of settlement:</b>	Warminster	
No. of responses received:	1	
<b>Comment ID No.</b>	<b>Consultee ID</b>	<b>Agent ID</b>
<b>108</b>	1134103	931633
<b>Summary of comments received:</b>		
<ul style="list-style-type: none"> <li>• Support inclusion of property known as The White House, at map grid references F4, G3 and G4, within the Warminster settlement boundary.</li> </ul>		

<b>SBR PC31</b>		
<b>Name of settlement:</b>	Codford	
No. of responses received:	4	
<b>Comment ID No.</b>	<b>Consultee ID</b>	<b>Agent ID</b>
<b>45</b>	1143253	N/A
<b>46</b>	1143232	N/A
<b>96</b>	1187089	N/A
<b>529</b>	1187998	N/A
<b>Summary of comments received:</b>		
<ul style="list-style-type: none"> <li>• Support proposed change at map grid reference F5 and F6</li> <li>• Extend the settlement boundary to include land on the old A36 below the property known as Ivy Cottages, at map grid reference D4, within the Codford settlement boundary.</li> </ul>		

<b>SBR PC33</b>		
<b>Name of settlement:</b>	Bratton	
No. of responses received:	1	
<b>Comment ID No.</b>	<b>Consultee ID</b>	<b>Agent ID</b>
<b>101</b>	1187159	N/A
<b>Summary of comments received:</b>		
<ul style="list-style-type: none"> <li>• Include land occupied by derelict building that is capable of development within the Bratton settlement boundary, at map grid reference I8.</li> </ul>		



<b>SBR PC36</b>		
<b>Name of settlement:</b>	Mere	
No. of responses received:	1	
<b>Comment ID No.</b>	<b>Consultee ID</b>	<b>Agent ID</b>
<b>393</b>	448866	1187789
<b>Summary of comments received:</b>		
<ul style="list-style-type: none"> <li>Support the inclusion of the Beaumont Business Park site, at map grid reference K9, K10, L9 and L10, within the Mere settlement boundary, given the previously developed nature of the site.</li> </ul>		

<b>SBR PC37</b>		
<b>Name of settlement:</b>	Salisbury	
No. of responses received:	1	
<b>Comment ID No.</b>	<b>Consultee ID</b>	<b>Agent ID</b>
<b>391</b>	903164	N/A
<b>Summary of comments received:</b>		
<ul style="list-style-type: none"> <li>Support inclusion of "Asda site" at London Road, Salisbury, at map grid reference M5, within the Salisbury settlement boundary. This site has extant planning permissions, including one that has been implemented. Its inclusion reflects both the support for the site to be developed and how it sits within the settlement of Salisbury.</li> </ul>		

<b>SBR PC39</b>		
<b>Name of settlement:</b>	Coombe Bissett	
No. of responses received:	1	
<b>Comment ID No.</b>	<b>Consultee ID</b>	<b>Agent ID</b>
<b>397</b>	556113	N/A
<b>Summary of comments received:</b>		
<ul style="list-style-type: none"> <li>• Support Proposed Change, at map grid reference J6, K6, J7 and K7, to Coombe Bissett settlement boundary.</li> </ul>		

<b>SBR PC40</b>		
<b>Name of settlement:</b>	Whiteparish	
No. of responses received:	1	
<b>Comment ID No.</b>	<b>Consultee ID</b>	<b>Agent ID</b>
<b>98</b>	473545	N/A
<b>Summary of comments received:</b>		
<ul style="list-style-type: none"> <li>• Support proposed change at map grid reference H7.</li> </ul>		

<b>SBR PC41</b>		
<b>Name of settlement:</b>	Winterslow	
No. of responses received:	4	
<b>Comment ID No.</b>	<b>Consultee ID</b>	<b>Agent ID</b>
<b>237</b>	1182628	N/A
<b>371</b>	391900	N/A
<b>440</b>	1187878	1187879
<b>441</b>	1187878	1187879
<b>Summary of comments received:</b>		
<ul style="list-style-type: none"> <li>• Objection to the proposed change, the inclusion of land, at map grid references F5, F6, G5 and G6, within the Winterslow settlement boundary. This is contrary to the revised methodology that excludes the curtilage of properties that have the capacity to substantially extend the built form of the settlement. The site was deemed undeliverable by the Winterslow Neighbourhood Planning Group and removed from their emerging draft Plan. Its inclusion is not supported by the Parish Council.</li> <li>• Support proposed change to Winterslow settlement boundary, particularly Old Manor Farm and part of the land to the rear (south west), at map grid reference D7.</li> <li>• Object to exclusion of part of the land to the rear (south west) of Old Manor Farm, at map grid reference D7, from the Winterslow settlement boundary. Including this land would follow a clearly defined physical feature, the footpath.</li> </ul>		

<b>SBR PC42</b>		
<b>Name of settlement:</b>	Tisbury	
<b>No. of responses received:</b>	5	
<b>Comment ID No.</b>	<b>Consultee ID</b>	<b>Agent ID</b>
121	1187418	N/A
306	1121411	N/A
342	1121411	N/A
390	1187835	N/A
486	1188037	N/A
<b>Summary of comments received:</b>		
<ul style="list-style-type: none"> <li>• Objection to Proposed Change (inclusion of land) which includes large gardens and paddocks at the edge of the settlement, contrary to the methodology. Based upon a representation from West Tisbury Parish Council, made without consultation with residents and which the Parish Council now wish to revise.</li> <li>• Request for local residents to be consulted about this proposed change, at map grid references E8 and F8, to Tisbury settlement boundary and for Wiltshire Council to clarify the status of the land.</li> <li>• Residents support inclusion in the settlement of the gardens and garages of 86, 87, 88 and 89 Monmouth Road, but exclude the field adjoining 86 Monmouth Road, the vegetable gardens next to Stanley Cottage Monmouth Road, the line of large conifers forming the field boundary and the space between those trees and the access track.</li> </ul>		

<b>SBR PC45</b>		
<b>Name of settlement:</b>	Dinton	
No. of responses received:	1	
<b>Comment ID No.</b>	<b>Consultee ID</b>	<b>Agent ID</b>
<b>387</b>	1187792	1187789
<b>Summary of comments received:</b>		
<ul style="list-style-type: none"> <li>• Objection to the removal of land associated with the property known as Fair View, at map grid reference G6, from within the Dinton settlement boundary. The proposed boundary does not align with clearly defined physical features and, moreover, a number of similar situations to the north of the settlements have been amended, adding residential gardens back within the settlement boundary.</li> </ul>		

<b>Representations made in relation to the Sustainability Appraisal Report (EXAM/02A)</b>		
No. of responses received:	13	
<b>Comment ID No.</b>	<b>Consultee ID</b>	<b>Agent ID</b>
22	1126059	N/A
59	704825	N/A
60	704825	N/A
61	704825	N/A
62	704825	N/A
81	402574	N/A
217	1187599	894742
252	871876	N/A
266	900160	900154
300	1133384	1128217
449	645345	389644
460	1126137	N/A
461	1126137	N/A
<b>Summary of comments received:</b>		
<ul style="list-style-type: none"> <li>• Page 254 of main Sustainability Appraisal (SA) Report refers to 32 dwellings for 'Land off B3098, Bratton' but page 14 of SA Non-Technical Summary (NTS) refers to 35 dwellings.</li> <li>• The SA Report contains a summary of the '6 key challenges' from the Wiltshire Core Strategy. The development of Site 321 at Bratton contravenes several of these.</li> <li>• The number of houses proposed at Bratton is beyond the needs and employment opportunities in the village and will increase out-commuting.</li> <li>• Bratton has an emerging neighbourhood plan. The proposed development of site 321 is against the wishes of the parish council.</li> <li>• The existing infrastructure of Bratton does not provide safe access into the village for cyclists and pedestrians travelling from Site 321.</li> <li>• Development south of Trowbridge will lead to increased traffic congestion and exacerbate air quality issues.</li> <li>• Para 8.3.226 – object to new text as misleading and confusing. The SA of site S98 is generalised and nebulous and the dwelling figures quoted for S98 and 3154 as assessed by the SA are incorrect – the original capacities assessed were 103 (S98) and 14 (3154).</li> <li>• Request that the Plan wording is amended to extend H3.6 Clover Lane</li> <li>• The SA does not assess adequately the issue of surface water flood risk and does not mention Environment Agency advice that an SFRA 2 and Surface Water Management Plan are required for Warminster.</li> <li>• Object to the SA assessing site 3435 as a 'less sustainable' site and the 6 'moderate adverse effects'. The SA makes incorrect assumptions that are not justified.</li> <li>• Including Site 3435 as a housing allocation would ensure that the WHSAP is effective and deliverable within the Plan period.</li> <li>• The SA does not give a well-argued reasoned justification for a reduction in capacity of the wider SHLAA site 690 at Hullavington from 86 dwellings to 50 dwellings hence there is no SA justification for a site allocation that is smaller than SHLAA site 690.</li> </ul>		



- SA Report paras 1.7.42 and 8.3.115 do not reference the 'Memorandum of Understanding: River Avon Special Area of Conservation Phosphate Neutral Development Interim Mitigation (May 2018) (HRA/03)'.
- SA Report para 8.3.2 incorrectly lists 'East of the Dene, Warminster' as a mixed-use development which it is not.
- SA Report para 8.3.105 - even with a significant over-provision of open space and a sensitive response to the constraints within the application masterplan, the site has the potential to deliver a quantum of development in excess of 100 dwellings. it is considered that the capacity should be stated as approximately 100 – 130 dwellings.
- Site 3565 Southwick Court, Trowbridge – the SA defines the site as being used for informal recreation. A survey delivered average daily usage as being between 100 and 120 individuals.
- Site 3565 - The SA advises strongly that an independent Heritage Impact Assessment be made of the site.
- Site 3565 - the site is presented as being of marginal sustainability and fails many of the tests set up for sustainability criteria.

<b>Representations made in relation to the Sustainability Appraisal Report Annex I: A3 Chippenham CAR (EXAM/02A.1)</b>		
No. of responses received:	1	
<b>Comment ID No.</b>	<b>Consultee ID</b>	<b>Agent ID</b>
<b>307</b>	1133384	1128217
<b>Summary of comments received:</b>		
<ul style="list-style-type: none"> <li>Exam/02A.1 does not provide a well-argued reasoned justification for a reduction in capacity of the wider SHLAA site 690 from 86 dwellings to 50 dwellings hence there is no SA justification for a site allocation that is smaller than SHLAA site 690.</li> </ul>		

<b>Representations made in relation to the Sustainability Appraisal Report Non-Technical Summary (EXAM/02B)</b>		
No. of responses received:	1	
<b>Comment ID No.</b>	<b>Consultee ID</b>	<b>Agent ID</b>
<b>21</b>	1126059	N/A
<b>Summary of comments received:</b>		
<ul style="list-style-type: none"> <li>Page 14 of Sustainability Appraisal (SA) Non-Technical Summary refers to 35 dwellings for 'Land off B3098, Bratton' but page 254 of main SA Report refers to 32 dwellings.</li> </ul>		

<b>Representations made in relation to the update to the Update to the Assessment under the Habitats Regulations Assessment Addendum (September 2018) (EXAM/03)</b>		
No. of responses received:	4	
<b>Comment ID No.</b>	<b>Consultee ID</b>	<b>Agent ID</b>
<b>86</b>	382216	N/A
<b>255</b>	382305	N/A
<b>442</b>	979508	N/A
<b>443</b>	979508	N/A
<b>Summary of comments received:</b>		
<ul style="list-style-type: none"> <li>• Natural England - none of the changes proposed lead us to advise the Plan is unsound. However, we await the Habitats Regulation Assessment for this Plan, and until such time as we are satisfied that the Plan will not have an adverse effect on the integrity of any relevant designated sites, we cannot advise that the Plan is sound in HRA terms.</li> <li>• New Forest District Council - the 190 dwellings proposed in the WHSAP in the Downton area will have likely significant effects on New Forest European sites unless provision for mitigation is incorporated into the WHSAP - as currently drafted the Plan is contrary to the Habitats Regulations.</li> <li>• New Forest National Park Authority - the council needs to address impacts on the protected habitats of the New Forest through ensuring that adequate habitat mitigation measures are in place.</li> <li>• New Forest National Park Authority - The Authority is aware that a New Forest Mitigation Strategy referred to in paragraph 6.77 of the adopted Core Strategy (January 2015) hasn't been produced to date.</li> <li>• New Forest National Park Authority – 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 more recently Test Valley Borough Council).</li> <li>• New Forest National Park Authority – there is a clear need for local planning authorities around the New Forest to adopt a more strategic cross-boundary approach to habitat mitigation measures, to ensure each local planning authority complies with the requirements of the Habitats Regulations.</li> <li>• New Forest National Park Authority – the council's current involvement in the on-going research project along with other partner local authorities is welcomed.</li> <li>• New Forest National Park Authority – in the absence of a current mitigation strategy it is unclear how the housing allocations proposed in southern Wiltshire, which may have an impact on the New Forest protected European sites, <u>have been</u> (if already developed) and <u>will be</u> mitigated against (as they come forward for development).</li> <li>• New Forest National Park Authority - without provision for mitigation both in the recent past and moving forward, the Plan as currently drafted, fails to comply with the Habitats Regulations.</li> </ul>		

<b>Representations made in relation to Topic Paper 2 Site Selection Process Methodology (TOP/02)</b>		
No. of responses received:	4	
<b>Comment ID No.</b>	<b>Consultee ID</b>	<b>Agent ID</b>
<b>23</b>	1126059	N/A
<b>24</b>	1126059	N/A
<b>25</b>	1126059	N/A
<b>27</b>	1185571	N/A
<b>Summary of comments received:</b>		
<ul style="list-style-type: none"> <li>• Appendix 1, Page 29. Bratton Parish Council raised objections and withdrew its support for the site 321 proposal. This is not reflected in any of the September 2018 documents.</li> <li>• Appendix 1, Page 26. It is inaccurate to state Bratton comprises 819 dwellings. In 2011 the census identified 512. The document is a misrepresentation of the village size. The proposed addition of 35 dwellings represents an 8% growth. That's significant, not modest. This significant error was highlighted during the 2017 consultation and never rectified.</li> <li>• Appendix 1, Page 30. At Stage 2 site 321 was under consideration for 32 dwellings. In other documents this number is 35. Where is the justification to increase from 32 to 40, then reduce to 35? Consistency is required across all documents.</li> <li>• The Idmiston Parish Council (IPC) have a "made" Neighbourhood Plan. IPC (supported by the IPC Neighbourhood Plan) and the three villages in the Parish - Porton (<i>Large Village</i>), Gomeldon (<i>Small Village</i>) and Idmiston (<i>Small Settlement</i>) status do not support the inclusion of the SHLAA sites in the WHSAP.</li> </ul>		

<b>Representations made in relation to Topic Paper 3 Housing Land Supply Addendum (TOP/03C)</b>		
No. of responses received:	2	
<b>Comment ID No.</b>	<b>Consultee ID</b>	<b>Agent ID</b>
<b>33</b>	1183327	N/A
<b>533</b>	392036	1126545
<b>Summary of comments received:</b>		
<ul style="list-style-type: none"> <li>• More priority needed for rural settlements outside of defined settlement boundaries for windfall sites.</li> <li>• A data base should be kept of windfall sites of less than ½ hectare in case of shortfall in housing.</li> <li>• The council should apply the Sedgefield method (rather than Liverpool method) of calculating housing land supply.</li> <li>• To rectify the current shortfall in Trowbridge the WHSAP must maximise sustainable development opportunities.</li> <li>• The housing trajectory includes a number of the small sites (less than 10 dwellings) in Trowbridge Community Area that have permissions dating pre-2015. It is unclear if these sites will realistically come forward.</li> <li>• The five-year supply figures at Table 3.4 show that delivery is only marginally above 5 years.</li> </ul>		

<b>Representations made in relation to Topic Paper 4 Developing Plan Proposals Addendum (TOP/04C)</b>		
No. of responses received:	1	
<b>Comment ID No.</b>	<b>Consultee ID</b>	<b>Agent ID</b>
<b>534</b>	392036	1126545
<b>Summary of comments received:</b>		
<ul style="list-style-type: none"> <li>• The Plan is unsound as it has not been positively prepared and is not justified. This is primarily due to the fact that the indicative housing requirement which has been set for Trowbridge has still not been met through the proposed allocations.</li> <li>• The site promoter is able to demonstrate the deliverability of land at Elizabeth Way for circa 450 dwellings.</li> <li>• The quantum of housing development proposed at Trowbridge is falling increasingly short of the indicative requirement and needs to be addressed if the Plan is to succeed.</li> <li>• The Plan has not been positively prepared due to the fact that more than half of the indicative housing requirement allocated for delivery within Trowbridge has not been met, with a calculated deficit of 1,180.</li> <li>• The proposed quantum of 355 dwellings currently associated with allocation H2.3, does not meet the full potential capacity of the site</li> <li>• In order to make the Plan sound additional evidence needs to be provided as to how the council will maintain a 5-year supply.</li> <li>• We are in support of the update to the site boundary, which has also been accompanied by the council proposing that an additional 150 dwellings can be accommodated on the site.</li> <li>• In order to make the Plan sound, the allocation for land at Elizabeth Way should be increased to appropriately reflect the true capacity of the site.</li> </ul>		

<b>Representations made in relation to Malmesbury Community Area Topic Paper (CATP/07)</b>		
No. of responses received:	1	
<b>Comment ID No.</b>	<b>Consultee ID</b>	<b>Agent ID</b>
<b>448</b>	1134691	1134691
<b>Summary of comments received:</b>		
<ul style="list-style-type: none"> <li>• Question the late consideration of the site at Tuners Lane (OM014) as this site has not been considered by the council through previous versions of the Strategic Housing Land Availability Assessment (SHLAA).</li> </ul>		



<b>Representations made in relation to Salisbury Community Area Topic Paper (CATP/13)</b>		
No. of responses received:	1	
<b>Comment ID No.</b>	<b>Consultee ID</b>	<b>Agent ID</b>
<b>106</b>	1120809	N/A
<b>Summary of comments received:</b>		
<ul style="list-style-type: none"> <li>• Netherhampton Road site allocation:                             <ul style="list-style-type: none"> <li>○ Is poorly located to serve a wider area in terms of primary school provision.</li> <li>○ Positive effects identified are not site specific and would apply to any site of this size.</li> <li>○ – the site has no public transport or facilities within walking distance it will compound social disadvantage for those allocated to live there in social housing.</li> <li>○ the negative effects have been underestimated in the assessment.</li> <li>○ The Salisbury Transport Strategy fails to demonstrate that mitigation schemes are achievable to avoid significant effects on A36T and thereby support the allocation of land.</li> </ul> </li> </ul>		

<b>Representations made in relation to Trowbridge Community Area Topic Paper (CATP/17a)</b>		
No. of responses received:	3	
<b>Comment ID No.</b>	<b>Consultee ID</b>	<b>Agent ID</b>
<b>379</b>	1187638	894742
<b>463</b>	1126137	N/A
<b>532</b>	392036	1126545
<b>Summary of comments received:</b>		
<ul style="list-style-type: none"> <li>• This Plan should be prepared based on the Wiltshire Core Strategy objectives which seeks to meet the objectively assessed housing need by the end of the Plan period.</li> <li>• The indicative housing requirement has not been met through the proposed allocations.</li> <li>• The 'Sedgefield approach' conforms more closely with the requirement to Plan positively as it seeks to boost significantly the supply of land for housing in the early part of the Plan period.</li> <li>• In order to maintain a 5-year supply the council should maximise site capacities, eliminate any small sites which have expired from the 5-year land supply calculations, and ensure that the proposed Allocations are deliverable sites.</li> <li>• PC25 highlights a deficit of 1,297 dwellings at the town. The council's evidence base appears unable to reconcile this figure and therefore calls into the question the soundness of the Plan would like to raise this point to be clarified by the council.</li> <li>• Support of the update to the site boundary at H2.3 Elizabeth Way</li> <li>• The proposed quantum of 355 dwellings currently associated with allocation H2.3, does not meet the full potential capacity of the site.</li> <li>• H2.3 Elizabeth Way is supported by a drainage masterplan which will assist in addressing technical matters regarding the deliverability of the allocation.</li> <li>• Ecological work undertaken has been used to inform the Concept Masterplan.</li> <li>• The Plan does not propose to make the best and most efficient use of land to be allocated, which is unsustainable and not consistent with National Policy.</li> <li>• Site 3565 (H2.6) is unsuitable for development and unsustainable, which runs contrary to Core Policy 29 and should immediately render the site invalid, and would result in the coalescence of Trowbridge and Southwick.</li> <li>• On the northern side of the site (H2.6) lies the Lambrok stream drainage network which is defined by a hedgerow dating to at least 1795 and is protected by the 1997 Hedgerows Act.</li> <li>• Issues of surface water and untreated sewage flooding in the nearby housing developments adjacent to site H2.6.</li> <li>• Impacts of development on H2.6 on nearby heritage assets including Southwick Court and moat.</li> <li>• Development of H2.6 will lead to a loss / impact upon cattle farming, informal recreation and leisure, and houses a number of public footpaths.</li> <li>• Use of site H2.6 for dwellings will therefore increase flooding suffered by current dwelling invalidating the Environment Agency requirement for 'lifetime certainty' of freedom from flooding and fail NPPF sequential testing</li> <li>• Access to site H2.6 will either involve cutting through a level three flood plain and protected hedgerow; or cutting through Important Hedgerow protected by the 1997 Hedgerows Act; or cutting a road from Southwick village across landscape integral</li> </ul>		

to listed Heritage Assets; or enacting a Compulsory Purchase Order to develop Axe and Cleaver Lane to make it fit for vehicular traffic.

- Alternative/additional sites should be allocated.

<b>Representations made in relation to Westbury Community Area Topic Paper (CATP/19)</b>		
No. of responses received:	17	
<b>Comment ID No.</b>	<b>Consultee ID</b>	<b>Agent ID</b>
13	1125408	N/A
18	1126059	N/A
19	1126059	N/A
20	1126059	N/A
57	704825	N/A
63	704825	N/A
64	704825	N/A
94	1187065	N/A
114	1187388	N/A
118	1125770	N/A
325	1122130	N/A
329	1187758	1187754
340	1187761	N/A
437	1187771	N/A
464	1132525	N/A
481	1187949	N/A
513	1132525	N/A
<b>Summary of comments received:</b>		
<ul style="list-style-type: none"> <li>• There is not a strategic need for the number of homes proposed at Bratton. Both site 321 and 738 exceed the need for new housing in Bratton.</li> <li>• Within the Westbury Community Area there is an oversupply of homes.</li> <li>• Dilton Marsh should absorb some of the proposed housing.</li> <li>• Development at large villages should not exceed 10 dwellings.</li> <li>• The selection of the proposed allocation appears to be engineered. The site scored negatively in the SA.</li> <li>• The site opposite (738) was excluded due to a lack of walking/cycling facilities but this is not mentioned for the proposed allocation site.</li> <li>• Concern that site 738 is also allocated for development.</li> <li>• Do not support removal of site 738.</li> <li>• The landowner of site 738 objects to the removal of the site as there is a remaining requirement which hasn't been met.</li> <li>• Cycle/pedestrian access is achievable and 738 remains a viable site.</li> <li>• Site 738 would be less obtrusive/better screened than Site 321 and would deliver a smaller number of dwellings, addressing concerns about there being too many houses.</li> <li>• The re-introduction of Site 738 has highlighted an unfair assessment of sites 321 and 738 against sustainability criteria, with a bias in favour of Site 321.</li> <li>• Objections to the pre-submission consultation responses have been ignored.</li> <li>• The CATP has not been updated to mention that Bratton Parish Council rejected site 321 in September 2017.</li> <li>• The CATP contains contradictions – on page 46 it is noted that, "<i>The Parish Council did not respond to consultation on the Housing Site Allocations DPD.</i>" On page 63 it then notes that, "<i>Bratton Parish Council are in the early stages of preparing a Neighbourhood Development Plan...</i>" which implies</li> </ul>		

that they did respond.

- Inconsistency in the CATP and SA over number of dwellings on the proposed allocation (CATP page 17 table 6.6; page 18 table 6.8; page 68 table G6)
- Bratton Neighbourhood Steering Group have begun the process of developing a neighbourhood plan. It is felt that other more advanced neighbourhood plans have been afforded more weight than Bratton in terms of making proposed changes to the allocations set out in the WHSAP.
- There is insufficient evidence of need in the Westbury Community Area (including Westbury town) to justify the proposed allocation, and that too many homes are proposed.
- Not all available alternatives have been considered.
- A neighbourhood plan should be allowed to progress instead of allocation H2.13.
- Allocation of the proposed site would undermine the efforts of the neighbourhood plan steering group.
- Concerns are raised regarding impacts of development on the local landscape, ecology, highways and employment opportunities.
- There are errors in the census figures for number of dwellings in Bratton.
- There is a lack of clarity and consistency between the SA scoring differences between site 321 and 738.

<b>Representations made in relation to Memorandum of Understanding: River Avon Special Area of Conservation Phosphate Neutral Development Interim Mitigation (HRA/03)</b>		
No. of responses received:	3	
<b>Comment ID No.</b>	<b>Consultee ID</b>	<b>Agent ID</b>
<b>462</b>	1126137	N/A
<b>344</b>	487991	N/A
<b>456</b>	903369	443671
<b>Summary of comments received:</b>		
<ul style="list-style-type: none"> <li>• Site 3565 is unsuitable for development and unsustainable.</li> <li>• Concerns raised that the HRA assessment of 3565 determined that due to its ecologically and environmentally sensitive nature the Lambrok stream and associated drainage features must be protected and/or buffered.</li> <li>• The conservation status of the Avon SAC does not currently comply with the Habitats Directive/Regulations.</li> <li>• Serious doubts over compliance with the Habitats Directive/Regulations in relation to the integrity of two of the three SACs that could be adversely impacted by the Plan. Disagree that the site can be judged 'sustainable' – or lawful, or sound.</li> </ul>		

<b>Representations made in relation to Heritage Impact Assessment prepared by LUC (WHSAP/05)</b>		
No. of responses received:	2	
<b>Comment ID No.</b>	<b>Consultee ID</b>	<b>Agent ID</b>
<b>105</b>	1105805	N/A
<b>546</b>	1013209	1146294
<b>Summary of comments received:</b>		
<ul style="list-style-type: none"> <li>• Commentary on potential archaeological remains at H2.6, possibly land drains, and suggests that evidence in the HIA would indicate the capacity of the site should be reduced.</li> <li>• Unfathomable why the Heritage Impact Assessment does not include any assessment of the proposed Rowbarrow allocation.</li> </ul>		

<b>Representations made in relation to Stage 4a Site Landscape Assessment Part 3: Omission sites in the Chippenham, Devizes, Malmesbury, Salisbury, Warminster and Westbury Community Areas (WHSAP/21)</b>		
No. of responses received:	1	
<b>Comment ID No.</b>	<b>Consultee ID</b>	<b>Agent ID</b>
<b>388</b>	1122130	N/A
<b>Summary of comments received:</b>		
<ul style="list-style-type: none"> <li>• The site description for site 738 should include reference to the site's location close to the White Horse and Salisbury Plain.</li> <li>• Object to reference within site 738 assessment to the B3098 being 'not a particularly busy road'. This is not the case. Sites 738 and 321 are not 'peaceful'.</li> <li>• Object to visual prominence judgement for Site 738 as "Moderate-Low sensitivity". Site 321 is judged as "Moderate - High" – site 738 would be harmed to at least the same extent as Site 321.</li> <li>• Object to site 738 being assessed as having "moderate - high" overall mitigation potential.</li> <li>• Object to the magnitude of effects on landscape character as "Low adverse".</li> <li>• Object to site 738 being assessed as having "high" capacity to accommodate change.</li> </ul>		



<b>Representations made in relation to Consultation Statement Regulation 22 (1)(c) (WHSAP/09)</b>		
No. of responses received:	1	
<b>Comment ID No.</b>	<b>Consultee ID</b>	<b>Agent ID</b>
<b>58</b>	704825	N/A
<b>Summary of comments received:</b>		
<ul style="list-style-type: none"> <li>• The council has not adequately addressed the issues raised about the development of Site 321 as a result of the September 2017 consultation.</li> <li>• Site 321 - The Plan contravenes the WCS as it seeks to fulfil the quota for the Westbury Area Remainder rather than the needs of the village.</li> <li>• Site 321 - The reduction in the proposed number of houses from 40 to 35 is still totally unacceptable and in contravention of the statements contained within the WCS.</li> <li>• Site 321 - The Parish Council has put forward an alternative site within the village that would address the needs of the village and is currently working on its Neighbourhood Plan.</li> <li>• Site 321 - No amount of tree planting will lessen the impact of a densely developed housing estate on the edge of a unique village when viewed from the White Horse escarpment Ridge and Castle Road.</li> <li>• Site 321 - My house is adjacent to Site 321 and I will not be looking forward to sitting out in my garden during the summer months should the development go ahead.</li> <li>• Site 321 - Potential impacts on amenity of existing residents are easy to determine. There will be increased noise, traffic and light pollution for local residents and significant loss of views for others. Two windows of my house currently overlook miles of uninterrupted countryside.</li> <li>• Site 321 - The existing footpaths should not be diverted to facilitate the proposed development.</li> <li>• Site 321 - Many of the representations from the September 2017 consultation refer to the over-capacity of the village Doctor's surgery. This appears to have been overlooked by the council.</li> <li>• Site 321 - no mention is made of the congestion difficulties presented to the village by the potential increased volume of cars (at least 2 cars per household - 70 cars plus.</li> </ul>		

<b>Representations made in relation to Consultation Statement Regulation 22 (1)(c) Appendices N and O (WHSAP/11)</b>		
No. of responses received:	4	
<b>Comment ID No.</b>	<b>Consultee ID</b>	<b>Agent ID</b>
<b>14</b>	1126059	N/A
<b>15</b>	1126059	N/A
<b>16</b>	1126059	N/A
<b>17</b>	1126059	N/A
<b>Summary of comments received:</b>		
<ul style="list-style-type: none"> <li>• The statement presumes site 321 is a foregone conclusion rather than considering 321 and 738 based on their own merits.</li> <li>• Different, but also weak, reasons are being cited to eliminate site 738 from the fair democratic process. Reinstate site 738.</li> <li>• Alternative omission sites should be allocated.</li> <li>• A neighbourhood plan is being developed by Bratton Parish Council and parish council owned land is available within the village limits for development.</li> <li>• The council appear to have liaised with the site promotor but failed to liaise with the Parish council who represent the residents.</li> <li>• Public rights of way BRAT24 and BRAT25 should remain in situ and the Site Allocation documents amended accordingly. Sufficient land exists under this land's Title to accommodate the proposed dwellings AND accommodate the historic PROWs as existing.</li> </ul>		

<b>Representations made in relation to Appendix 3 to Cabinet Report 3rd July 2018 Note on Elm Grove Field and Implications for Asset Transfer (WHSAP/04)</b>		
No. of responses received:	2 (including petition listing 348 signatures)	
<b>Comment ID No.</b>	<b>Consultee ID</b>	<b>Agent ID</b>
<b>273</b>	1187727	N/A
<b>410</b>	1187736	N/A
<b>Summary of comments received:</b>		
<ul style="list-style-type: none"> <li>• Petition to fight against the proposals for the Queen Elizabeth II Field. [A total of 348 signatures have been collected].</li> <li>• The loss of our only green area, for children to play, people exercising and dog walkers to use.</li> <li>• The field became part of a legacy, after the London Olympics. It has been a recreational area for the past 30 years.</li> <li>• Increased traffic on Wiltshire Drive. At least 12 recorded accidents in recent years</li> <li>• Large lorries entering the field from Wiltshire Drive, during the adjacent housing development, prior to a school being built.</li> <li>• Do we need a new school? Schools are included in plans for the Yarnbrook to Hilperton development.</li> <li>• There are many mature and elderly residents in the immediate catchment area of Elizabeth II field. The lack of use of the play equipment is partly due to the increasing age profile of local residents.</li> <li>• The environment of Elizabeth II field represents one of the few areas of land available to exercise dogs. There are no other areas available for this amenity within any reasonable distance.</li> <li>• It is laudable to promote transport choices but it does not fit with the potential access hazards of a bend in Wiltshire Drive.</li> <li>• Schools should be placed central to new development, with appropriate transport planning.</li> <li>• The bend in Wiltshire Drive means that there is extremely poor visibility splay for which any access from Wiltshire Drive (including for construction traffic) would undoubtedly cause a parking problem either side of this bend, further adding to the reduction in visibility, and almost certainly, potential for accidents.</li> </ul>		

<b>Representations made in relation to Salisbury Transport Strategy Refresh Draft 2018 (WHSAP/08)</b>		
No. of responses received:	1	
<b>Comment ID No.</b>	<b>Consultee ID</b>	<b>Agent ID</b>
<b>419</b>	446468	N/A
<b>Summary of comments received:</b>		
<ul style="list-style-type: none"> <li>• Proposals for 840 houses plus other facilities in Salisbury would generate a large amount of traffic on local roads.</li> <li>• Building a southern by-pass might work but there is only one road out to the west of Harnham and one to the east.</li> <li>• The council should continue to look for brown sites etc like UK land and stop building on our fields or we will have to source more and more food from abroad.</li> </ul>		

<b>Representations made that were outside the scope of the consultation on the Schedule of Proposed Changes and Associated Documents / no specified Proposed Change</b>		
No. of responses received:	33	
<b>Comment ID No.</b>	<b>Consultee ID</b>	<b>Agent ID</b>
1	1102653	N/A
31	1185580	N/A
43	1121272	1146750
44	987760	N/A
87	895665	N/A
93	1106467	N/A
97	712868	1187094
100	556401	N/A
102	976774	N/A
103	558923	N/A
107	639331	N/A
113	1125430	N/A
116	392675	N/A
123	1187466	N/A
175	1187326	N/A
177	910944	N/A
179	1187579	N/A
235	1135279	N/A
244	1187710	N/A
254	634998	N/A
270	1187602	N/A
277	1187730	N/A
279	1134720	N/A
281	1187736	N/A
282	1131898	N/A
316	1131754	1131747
324	995516	N/A
384	1127014	N/A
392	457823	N/A
428	1187722	N/A
526	1119432	N/A
538	1069602	N/A
539	558939	N/A
<b>Summary of comments received:</b>		
<b>Objection that previous comments have not resulted in a Proposed Change / re-iteration of previous (Pre-Submission Consultation) comments</b>		
<ul style="list-style-type: none"> <li>Schedule of Changes does not reflect comments submitted at Pre-Submission Consultation contending the result of the assessment of site 3187 (Land at Harnham Business Park, Salisbury). The conclusion was to remove the site from consideration due to its existing designation as employment land and</li> </ul>		

that it would be within the proposed Settlement Boundary. Re-iteration of comments submitted on the Pre-Submission draft that the site should be considered suitable for allocation, as the Employment Land Review concluded that it was no longer needed as employment land.

- H2.4 Church Lane and H2.5 Upper Studley
  - Comments made regarding the necessary protection of ancient hedgerows at the boundary and through the site have not led to any change in the allocation.
  - Comments on the approach that discounts sites that are within the settlement boundary: the objectors insist that brownfield sites should be developed before sites outside the settlement boundary are allocated.
  - Information regarding the archaeology, heritage, recreation, agriculture, and environmental aspects of H2.4 Church Lane and H2.5 Upper Studley could not have been considered during the original assessment of the site as it was raised by residents and external agencies during the pre-submission consultation. Therefore the site should have been re-assessed following the pre-submission consultation.
- Reiteration of objection to allocation H2.4 Church Lane, H2.5 Upper Studley and H2.6 Southwick Court due to issues including impact on heritage assets, wildlife, coalescence between Trowbridge and surrounding villages, biodiversity and pollution of adjacent stream, flooding (on-site and beyond), traffic congestion, road safety, air pollution and impact on residents' recreational amenity.
- A number of representations have been submitted to reinforced objections to the allocation H2.4 Church Lane, quoting the sensitivity and importance of the Lambrok Stream in particular and suggestion that the site be included in the Southwick Country Park Nature Reserve instead of being allocated for housing.
- North Dorset District Council reiterated comments made at Pre-Submission stage and in June 2016, alerting Wiltshire Council to the potential need to allocate a site to meet the needs of Shaftesbury (Wiltshire).
- Objection to the way the Pre-Submission consultation was carried out, including points relating to the information provided, questions remaining unanswered, and that residents in close proximity to the proposed allocations were not directly informed.

**Representations on Pre-Submission Draft WHSAP, rather than on the present consultation material (Schedule of Proposed Changes)**

- H2.3 Elizabeth Way – objection to site allocation – when Elizabeth Way (the road) received permission it was on the basis that it would be a relief road for Hilperton and houses would not be built along the road. If access to housing developments are created along Elizabeth Way it will no longer serve as a relief road.
- Hullavington Settlement Boundary – Objection to the change to the Hullavington Settlement Boundary as proposed in the Pre-Submission and Submission Draft. Comments were not submitted at the time of the Pre-Submission consultation as the objector was not aware of the changes. The change relates to a site that has a planning application currently at appeal.
- Box Settlement Boundary – Two separate objections to changes to the Box Settlement Boundary as proposed in the Pre-Submission and Submission Draft. Comments were not submitted at the time of the Pre-Submission consultation as the objectors were not aware of the changes. Both comments

request that Settlement Boundary includes the entirety of the garden and curtilage of the property remains within the Settlement Boundary.

### **Support / no objection**

- Duty to Cooperate – the following bodies confirmed that they had no comment to make on the proposed changes: National Grid, Hampshire County Council, Dorset County Council, Gloucestershire County Council, Oxfordshire County Council, North Dorset District Council, Somerset County Council. The latter defers to Mendip DC and South Somerset DC as the relevant authorities to make comments on this Plan and these authorities also confirmed that they have no comments on the Plan.
- Bath and North East Somerset Council (B&NES) support the Plan as it aims to deliver the housing requirement set out in the Wiltshire Core Strategy, which was prepared in consultation with B&NES to be a complimentary spatial strategy to the B&NES Core Strategy.
- Instructive comments for all allocations
  - Sites must not be allocated if they would include the loss of playing fields or prejudice the use of a playing field unless it is in line with Wiltshire playing pitch strategy.
  - NHS CCG have no objections to the proposed allocations, but wish to be fully consulted on the Plan as it proceeds and at planning application stage to ensure appropriate CIL and S106 funding is secured.
  - Esso Petroleum state that they have apparatus near the proposed works. Esso Petroleum Ltd have no objections as long as the safety practice is followed, as per the 'Special Requirements for Safe Working' booklet provided. *[However, the rep provides maps showing Esso apparatus across Wiltshire – possibly as they were unable to locate the sites – and on inspection it appears that the only allocation in close proximity to a pipeline is H3.6 The Yard.*
- Support for the draft WHSAP in so far as it does not allocate sites at Mere, and objection to the sites at Mere being proposed by developers for inclusion as allocations within the WHSAP.
- Non-specific support for / no objection to the Plan in general.
- Pitton and Farley Parish Council – reiteration of comments submitted during 2015 consultation with Town and Parish Councils.
- Crudwell Planning Application 18/05429/FUL: Comments have been submitted in error to the Schedule of Proposed Changes Consultation. Comments object to a planning application at the site allocated in the Pre-Submission Draft WHSAP, that is removed from the Submission Draft WHSAP as per PC92. These representations can be read as support for PC92, and have also been submitted to the relevant consultation on the planning application.

Economic Development and Planning  
County Hall  
Bythesea Road  
Trowbridge  
Wiltshire  
BA14 8JN

25 September 2018

Our reference: 1134742

Dear Sir/Madam,

**Wiltshire Housing Site Allocations Plan - Focused consultation on the Schedule of Proposed Changes to the draft Wiltshire Housing Site Allocations Plan and associated evidence documents**

In July 2018, the council submitted the draft Wiltshire Housing Site Allocations Plan (the Plan), along with a 'Schedule of Proposed Changes' and supporting evidence to the Secretary of State for independent examination (<http://www.wiltshire.gov.uk/planning-housing-sites-examination>) process. Planning Inspector, Steven Lee BA (Hons) MA MRTPI has been appointed to undertake the examination.

Details of all the documents submitted can be found on the Council's website at the following address: <http://www.wiltshire.gov.uk/planning-whsap>

In August 2018, the council received a procedural letter from the Inspector. In response to that letter, the Council is undertaking consultation on the 'Schedule of Proposed Changes' to the Plan and associated evidence documents.

This further round of consultation will take place for six weeks from **9am Thursday 27 September to 5pm Friday 9<sup>th</sup> November** to give all interested parties the opportunity to comment on the published materials before the Inspector commences the formal public hearing sessions.

The Schedule of Proposed Changes should be read in conjunction with the Wiltshire Housing Site Allocations Plan - Submission Draft Plan July 2018 (WHSAP/01). Representations are invited on the 'soundness' and legal compliance of the Proposed Changes only and should not seek to introduce new matters. Once the consultation has ended the Inspector will consider the responses received on the Proposed Changes and assess whether they raise any issues of 'soundness' or legal compliance. A guidance note has been prepared to explain what is meant by soundness and legal compliance as well as how to make your comments.

The council has also produced a Revised Sustainability Appraisal (SA) (EXAM/02A, EXAM/02A.1, EXAM/02B and EXAM/02C) and an update to the Addendum to the Wiltshire Housing Site Allocations Pre-Submission Draft (June 2011) Assessment under Habitats Regulations: September 2018 (EXAM/03). Comments can also be made on these during the consultation period.

We have produced a number of evidence documents, which can be referred to in commenting on the Schedule of Proposed Changes. These documents are listed in the final column of that schedule.



## **Consultation documents**

The main consultation documents are as follows:

- Schedule of Proposed Changes to Wiltshire Housing Site Allocations Plan – Consultation Document September 2018 (EXAM/01);
- Wiltshire Housing Site Allocations Plan Sustainability Appraisal Revised September 2018 (EXAM/02A, EXAM/02A.1, EXAM/02B and EXAM/02C); and
- Update to the Addendum to the Wiltshire Housing Site Allocations Pre-Submission Draft (June 2017) Assessment under the Habitats Regulations Assessment Addendum (September 2018) (EXAM/03)

The following documents also provide the context for the Proposed Changes to the Wiltshire Housing Site Allocations Plan:

- Wiltshire Housing Site Allocations Plan Topic Paper 1 – Settlement Boundary Review Methodology (July 2018 Submission version) (TOP/01);
- Wiltshire Housing Site Allocations Plan Topic Paper 2 – Site Selection Process Methodology (July 2018 Submission version) (TOP/02);
- Wiltshire Housing Site Allocations Plan Topic Paper 3 – Housing Land Supply Addendum (July 2018 Submission version) (TOP/03C);
- Wiltshire Housing Site Allocations Plan Topic Paper 4 – Developing Plan Proposals Addendum (July 2018 Submission version) (TOP/04C);
- Wiltshire Housing Site Allocations Plan Community Area Topic Paper Devizes (July 2018 Submission version) (CATP/06);
- Wiltshire Housing Site Allocations Plan Community Area Topic Paper – Malmesbury (July 2018 Submission version) (CATP/07);
- Wiltshire Housing Site Allocations Plan Community Area Topic Paper - Salisbury (July 2018 Submission version) (CATP/13);
- CATP/17 – Wiltshire Housing Site Allocations Plan Community Area Topic Paper – Trowbridge (July 2018 Submission version);
- Wiltshire Housing Site Allocations Plan Community Area Topic Paper – Westbury (July 2018 Submission version) (CATP/19);
- Memorandum of Understanding: River Avon Special Area of Conservation Phosphate Neutral Development – Interim Mitigation (May 2018) (HRA/03);
- Wiltshire Housing Site Allocations Plan Heritage Impact Assessment Final Report Prepared by LUC (March 2018) (WHSAP/05);
- Wiltshire Housing Site Allocations draft plan - Stage 4a Site Landscape Assessment Part 2: Salisbury, Tidworth, Trowbridge, Warminster and Westbury Community Areas – Prepared by Wiltshire Council and The Environment Partnership (June 2017) (WHSAP/20);
- Wiltshire Housing Site Allocations Plan Consultation Statement Regulation 22 (1)(c) (July 2018 Submission version) (WHSAP/09) (available on line and at the Council's main offices as below);
- Wiltshire Housing Site Allocations Plan Consultation Statement Regulation 22 (1)(c) Appendices N and O (July 2018 Submission version) (WHSAP/11) (available on line and at the Council's main offices as below);
- Wiltshire Housing Site Allocations Plan Consultation Statement Regulation 22(1)(c) Appendix Q (July 2018 Submission version) (WHSAP/12) (available on line and at the Council's main offices as below);
- Appendix 3 to Cabinet Report 3<sup>rd</sup> July 2018 – Note on Elm Grove Field and Implications for Asset Transfer (July 2018) (WHSAP/04);
- Wiltshire Council - Salisbury Transport Strategy – Draft Strategy Refresh 2018 (July 2018) (WHSAP/08);

- Wiltshire Council - Trowbridge Transport Strategy Refresh – Strategy Refresh 2018 (May 2018) (WHSAP/07); and
- Wiltshire Council Draft minutes of the Cabinet meeting held on 3 July 2018 (DEM/03).

Note: the references in brackets are taken from the Document Library which can be found here <https://cms.wiltshire.gov.uk/ecCatDisplay.aspx?sch=doc&cat=14020>.

### **Location of documents**

Copies of the consultation documents can be viewed and downloaded:

- from the Consultation Portal  
[http://wiltshire.objective.co.uk/portal/spatial\\_planning/sites\\_dpd/proposed\\_changes\\_on\\_draft\\_whsap/schedule\\_of\\_proposed\\_changes\\_to\\_the\\_draft\\_whsap](http://wiltshire.objective.co.uk/portal/spatial_planning/sites_dpd/proposed_changes_on_draft_whsap/schedule_of_proposed_changes_to_the_draft_whsap)
- the Council's website at <http://www.wiltshire.gov.uk/wiltshsgsiteallocationsplan>.

They can also be viewed during normal opening hours at Wiltshire Council Libraries and the Council's main offices at:

- Monkton Park, Chippenham Wiltshire SN15 1ER;
- Bourne Hill, Salisbury, SP1 3UZ; and
- County Hall, Bythesea Road, Trowbridge BA14 8JN.

### **How to respond**

Comments are only invited on the above matters and should not repeat any previous representations that you have made during the draft Wiltshire Housing Site Allocations Plan consultation (14 July 2017 to 22 September 2017), as these have already been sent to the Inspector. A guidance note has been produced to assist you and can be referred to before completing the form(s).

We welcome your comments via the following means although direct input via the portal or email is the preferred method of communication:

- Online via the consultation portal  
[http://wiltshire.objective.co.uk/portal/spatial\\_planning/sites\\_dpd/proposed\\_changes\\_on\\_draft\\_whsap/schedule\\_of\\_proposed\\_changes\\_to\\_the\\_draft\\_whsap](http://wiltshire.objective.co.uk/portal/spatial_planning/sites_dpd/proposed_changes_on_draft_whsap/schedule_of_proposed_changes_to_the_draft_whsap)
- by email using the specific representation form under Supporting Documents below and returned to [spatialplanningpolicy@wiltshire.gov.uk](mailto:spatialplanningpolicy@wiltshire.gov.uk); or
- by post in writing to: Spatial Planning, Economic Development & Planning, Wiltshire Council, County Hall, Bythesea Road, Trowbridge, Wiltshire, BA14 8JN.

Please note that copies of all comments will be made available to the public to view and therefore cannot be treated as confidential. Anonymous representations cannot be accepted.

### **Next steps and further information**

Following the consultation, the Council will collate the responses received and provide the Inspector with the full responses together with a summary of the main issues raised.

Should you require further information on the consultation, please email: [spatialplanningpolicy@wiltshire.gov.uk](mailto:spatialplanningpolicy@wiltshire.gov.uk) or telephone 01225 713223.

We have written to you today because you have previously commented on a planning policy document or asked to be kept informed about planning policy matters. If you no longer want

to be involved or notified about the Plan please let us know using this email contact and we can remove you from our mailing list: [spatialplanningpolicy@wiltshire.gov.uk](mailto:spatialplanningpolicy@wiltshire.gov.uk)

Yours faithfully

A handwritten signature in black ink, appearing to read 'T. Martienssen', with a horizontal line extending to the right.

Tim Martienssen  
Director, Economic Development and Planning  
Wiltshire Council

Schedule of Proposed Changes to the draft WHSAP will be available for you to view and comment between the following dates:

Start date: 27/09/18 09:00

End date: 09/11/18 17:00

Please select the following link to view this event:

[http://consult.wiltshire.gov.uk/portal/spatial\\_planning/sites\\_dpd/proposed\\_changes\\_on\\_draft\\_whsap/schedule\\_of\\_proposed\\_changes\\_to\\_the\\_draft\\_whsap](http://consult.wiltshire.gov.uk/portal/spatial_planning/sites_dpd/proposed_changes_on_draft_whsap/schedule_of_proposed_changes_to_the_draft_whsap)

If the link appears to be broken, please try copying the entire link into the address bar on your web browser.

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#### List of planning applications

#### Town and Country Planning (General Development Procedure) (England) Order 2015 Town and Country Planning (Listed Buildings and Conservation Areas (Amendment) (England) Regulations 2010

The following planning applications are those affecting the setting of a Listed Building, a Conservation Area, a Public Right of Way, or major applications and are available to view on our website. Views relating to the planning applications listed below should be made by **18 October 2018** quoting the reference number. All views expressed regarding a planning application will be considered and placed on a file, which is open to the public.

**AMESBURY 18/07937/FUL & 18/08276/ADV** - Land East of Solstice Park Roundabout Equinox Drive – Distribution centre/signage **18/08146/FUL** - Dianas House Abbey Mews – Garden studio/log shed/ (retrospective) tool shed **COMPTON CHAMBERLAYNE 18/08326/FUL** - Bank Cottage High Street – Replacement dwelling **ENFORD 18/08354/FUL** - Land Opposite The Cottage East Chisenbury – Two parking spaces **GRIMSTEAD 18/07210/FUL** - Rowdens Farm Grimstead Road – Replace greenhouse, shed & veranda (retrospective) **IDMISTON 18/08496/FUL & 18/08762/LBC** - Boxhedge Cottage High Street – Replacement gate (retrospective) **SALISBURY CITY 18/07749/FUL & 18/07996/LBC** - Salisbury Arts Centre Bedwin Street – Air conditioning **18/08289/VAR** - Homebase Ltd Southampton Road – Vary condition 5 of S/1991/1131 **18/08334/106** - Homebase Ltd Dolphin Trading Estate Southampton Road – Modification of schedule 2 of the S106 on S/1991/1131 **18/08599/FUL & 18/08848/LBC** - 3 Endless Street – Change of use to residential

Email: developmentmanagement@wiltshire.gov.uk

#### Wiltshire Council Local Development Framework Planning and Compulsory Purchase Act 2004 (as amended) The Town and Country Planning (Local Planning) (England) Regulations 2012 and The Environmental Assessment of Plans and Programmes Regulations 2004

#### Focused consultation on the Schedule of Proposed Changes to the draft Wiltshire Housing Site Allocations Plan supported by the accompanying Sustainability Appraisal Report, Habitats Regulations Assessment Addendum and associated evidence documents

Wiltshire Council is consulting on the Schedule of Proposed Changes to the draft Wiltshire Housing Site Allocations Plan and associated evidence documents from **Thursday 27th September until 5pm, Friday 9th November 2018**.

The draft Wiltshire Housing Site Allocations Plan, a formal Development Plan Document, along with a Schedule of Proposed Changes was submitted to the Secretary of State for Communities and Local Government on 31 July 2018 for Examination. The Schedule of Proposed Changes, along with the updates to the Sustainability Appraisal, Habitat Regulations Assessment Addendum and associated evidence documents are the subject of this consultation.

#### Availability of Documents

The consultation documents can be viewed at:

<http://www.wiltshire.gov.uk/planning-housing-sites-examination> and at the following locations during normal opening hours: the council's main offices at Monkton Park, Chippenham Wiltshire SN15 1ER; Bourne Hill, Salisbury, SP1 3UZ and County Hall, Bythesea Road, Trowbridge BA14 8JN; and in Wiltshire Council libraries.

#### How to submit comments

A guidance note on the consultation is available at the above locations. Comments are only invited on the above matters and should not repeat any previous representations that you have made during the draft Wiltshire Housing Site Allocations Plan consultation (14 July 2017 to 22 September 2017), as these have already been sent to the Inspector.

We welcome your comments in writing (preferred method through direct input via the portal/email) by **5pm, Friday 9th November 2018** via the following means:

- online via the council's consultation portal: <http://consult.wiltshire.gov.uk/portal>
- by email using the form available at: <http://www.wiltshire.gov.uk/planning-housing-sites-examination> and returned to [spatialplanningpolicy@wiltshire.gov.uk](mailto:spatialplanningpolicy@wiltshire.gov.uk); or
- by post in writing to: Spatial Planning, Economic Development and Planning, Wiltshire Council, County Hall, Bythesea Road, Trowbridge, Wiltshire, BA14 8JN.

#### Next steps

Following the close of the consultation all the comments received will be forwarded to the appointed Inspector to be taken into consideration as part of the examination process.

Any representation may be accompanied by a request to be notified at a specified address of any of the following: that the Inspector's Report (including any recommendations) into the draft Wiltshire Housing Site Allocations Plan has been published; and that the Wiltshire Housing Site Allocations Plan has been adopted.

Director for Economic Development and Planning

#### Section 14(1) of the Road Traffic Regulation Act 1984

Notice is hereby given that Wiltshire Council has made an Order to temporarily introduce No Waiting at any time in the interests of public safety on the following lengths of roads: **a) Christie Miller Road (Part), Salisbury;** from its junction with St Gregory's Avenue/Indian Avenue to its junction with Montgomery Gardens; **b) Montgomery Gardens (Part), Salisbury;** from its junction with Christie Miller Road to its junction with Chancery Close; **c) Chancery Close, Salisbury;** from its junction with Montgomery Gardens. **The closure will be clearly indicated by traffic signs and access will be maintained for residents and businesses.** This closure which follows an emergency notice will come into operation on 4 October 2018 and it will be required until 1 December 2018. It is anticipated that the works will take the stated duration to complete. Access will be maintained for residents and businesses where possible, although delays are likely due to the nature of the works. The Order will have a maximum duration of 18 months. For further information please contact Simon Rowe (Wiltshire Council) on 01225 718284.

#### Section 14(1) of the Road Traffic Regulation Act 1984

Notice is hereby given that Wiltshire Council has made an Order to close temporarily to all traffic in the interest of public safety: **a) Christie Miller Road (Part), Salisbury;** from its junction with Montgomery Gardens; **b) Footway between Christie Miller Road and Highbury Avenue;** from adjacent to 1 Montgomery Gardens to adjacent to 63 Highbury Avenue. **The closure will be clearly indicated by traffic signs and access will be maintained for residents and businesses.** This closure which follows an emergency notice will come into operation on 1 October 2018 and it will be required until 1 December 2018. It is anticipated that the works will take the stated duration to complete. Access will be maintained for residents and businesses where possible, although delays are likely due to the nature of the works. The Order will have a maximum duration of 18 months. For further information please contact Simon Rowe (Wiltshire Council) on 01225 718284.

#### Road Traffic Regulation Act 1984

#### Traffic Management Act 2004

#### 1. The County of Wiltshire (Various Roads, Tisbury) (Prohibition and Restriction Of Waiting) Order 2018

#### 2. The County of Wiltshire (Various Roads, Tisbury) (Street Parking Places) Order 2018 (Previously advertised as 2017)

Notice is hereby given that on 11 September 2018 Wiltshire Council made the above mentioned Orders under the Road Traffic Regulation Act 1984 ("the Act of 1984") and the Traffic Management Act 2004 the effect of which is to revoke The County of Wiltshire (Various Roads Tisbury) (Prohibition and Restriction of Waiting) Order 2003 and re-enact it, in part, in the above Order 1 and to revoke The County of Wiltshire (Various Roads, Tisbury) (Street Parking Places) Order 2003 and The County of Wiltshire (Various Roads, Tisbury) (Street Parking Places) Order 2003 (Amendment No.1) Order 2013 and re-enact them, in part, in the above Order 2 the effect of which will be a) To introduce **No Waiting at any time on Vicarage Road** – north west side – from its junction with Churchill Estate for a distance of 71 metres in a north easterly direction; **Vicarage Road** – south east side – from a point 17 metres south west of its junction with High Street for a distance of 51 metres in a south westerly direction; b) To remove Parking Monday to Saturday 8am – 6pm 1 hour No return within 2 hours and replace with **No Waiting at any time on High Street** – south west side – from a point 37 metres south east of its junction with Beckett Street to a point 29 metres north west of a point in line with the south eastern elevation of property known as Blundells House; c) To remove Parking Monday to Saturday 8am – 6pm 1 hour No return within 2 hours and replace with unrestricted parking on **High Street** – east side – from a point 2 metres south of a point in line with the northern boundary of property known as The Elms to a point 71 metres north of its junction with Park Road. Following a decision from the Cabinet Member for Highways, Transport and Waste amendments have been made to the restrictions previously advertised on **High Street**. A copy of the Orders and plans may be inspected at the offices of Wiltshire Council, County Hall, Trowbridge during normal office hours. Any person aggrieved by the Orders and desiring to question the validity of the Orders or of any provision contained in the Orders on the grounds that it is not within the powers of the relevant Section of the Act of 1984 or on the grounds that any requirement of that Section or of Part III of Schedule 9 of the Act of 1984 or any regulation made under the said Schedule, has not been complied with in relation to the Orders may, within six weeks of the date on which the Orders were made, make application for the purpose to the High Court. The Orders came into operation on 24 September 2018.

#### Road Traffic Regulation Act 1984

#### The County of Wiltshire (Various Roads, Salisbury, South Newton and Woodford) (50mph Speed Limit) Order 2018

Notice is hereby given that on 18 September 2018 Wiltshire Council made the above mentioned Order under the Road Traffic Regulation Act 1984 the effect of which is to revoke The County of Wiltshire (Various Roads, Salisbury, South Newton and Woodford) (50mph Speed Limit) Order 2004 and re-enact for administrative purposes, and to introduce a 50mph speed limit on **A360 Devizes Road** – from a point 67 metres north west of its roundabout junction with Ramleaze Drive to a point 390 metres south east of its junction with C57 The Avenue. A copy of the Order and plan may be inspected at the offices of Wiltshire Council, County Hall, Trowbridge during normal office hours. Any person aggrieved by the Order and desiring to question the validity of the Order or of any provision contained in the Order on the grounds that it is not within the powers of the relevant Section of the above Act or on the grounds that any requirement of that Section or of Part III of Schedule 9 of the Act or any regulation made under the said Schedule, has not been complied with in relation to the Order may, within six weeks of the date on which the Order was made, make application for the purpose to the High Court. The Order will come into operation on 1 October 2018.

#### Section 14(1) of the Road Traffic Regulation Act 1984

Notice is hereby given that Wiltshire Council has made an Order to close temporarily to all traffic: **C296 Millbrook Lane, East Knoyle;** from its junction with C309 Tokes Lane to its junction with A350 to enable repairs to the highway due to damage caused by badger activity. Alternative routes: traffic approaching from the west – A350 - C58 Sheephouse Lane - C302 - C309 via White Hill Hindon to Kinghay Crossroads or alternatively A350 - C62 - C309 back to Kinghay – and vice versa. traffic approaching from the east via Semley and West Tisbury, C309 Tokes Lane at Kinghay Crossroads - A350 via the C62 Semley Common, or alternatively heading due north at Kinghay Cross roads, via the C309 Cools Farm and the C302 white Hill to Hindon – and vice versa. **The closure and diversion route will be clearly indicated by traffic signs.** This road closure, which follows an emergency notice, will come in to effect on 2 October 2018 and it is anticipated that the closure will be required until 30 November 2018. It is anticipated that the works will take the stated duration to complete depending upon weather conditions. Access will be maintained for residents and businesses where possible, although delays are likely due to the nature of the works. The Order will have a maximum duration of 18 months. For further information please contact David Button (Wiltshire Council) on 01722 438923.

#### Section 14(1) of the Road Traffic Regulation Act 1984

Notice is hereby given that Wiltshire Council intends to make an Order to close temporarily to all traffic: **(a) Slab Lane, Downton and Redlynch;** from its junction with B3080 Lode Hill to its junction with B3080 The Ridge to enable Tarmac to carry out Carriageway Resurfacing, Drainage and Road Marking works. Alternative route via B3080 Lode Hill – B3080 The Ridge and vice versa. This Order will come into operation on 23 October 2018 and it is anticipated that the closure will be required between the hours of 09:30 and 15:30 until 27 October 2018. For further information please contact Chris Jenkins on 01225 730362. Notice is hereby given that Wiltshire Council has made Orders to close temporarily to all traffic: **(b) Wishford Road, Woodford;** from its junction with A360 to its junction with C42 to enable Tarmac to carry out carriageway resurfacing & associated maintenance works. Alternative route via A360 – Camp Hill – C42 and vice versa. This Order will come into operation on 03 October 2018 between the hours of 09:00 and 15:00 for one day. For further information please contact Terry McKenna (Atkins) on 01225 730360. **(c) C288 (Part), Idmiston, Winterbourne and Durnford;** from its junction with A345 to its junction with A338 to enable Tarmac to carry out carriageway resurfacing and associated maintenance works. Alternative route via A345 – Down Barn Road – A338 and vice versa. This Order will come into operation on 02 October 2018 between the hours of 09:00 and 15:00 for 1 day. For further information please contact Terry McKenna (Atkins) on 01225 730360. Orders (a) to (c) will have a maximum duration of 18 months. **The closure and diversion route will be clearly indicated by traffic signs.** It is anticipated that the works will take the stated duration to complete depending upon weather conditions. Access will be maintained for residents and businesses where possible, although delays are likely due to the nature of the works.

# Planning policy

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## Introduction to Planning Policy

> [What is Planning Policy?](#)

> [National Planning Policy](#)

## Latest News

Please see below information on selected recent news that we feel may be of interest to you.

✓ **Wiltshire Housing Site Allocations Plan - Focussed consultation on the Schedule of Proposed Changes and associated evidence documents**

In July 2018, the council submitted the draft Wiltshire Housing Site Allocations Plan (the Plan), along with a 'Schedule of Proposed Changes' and supporting evidence to the Secretary of State for independent examination. Planning Inspector, Steven Lee BA (Hons) MA MRTPI has been appointed to undertake the examination.

In August 2018, the council received a procedural letter from the Inspector. In response to that letter, the Council is undertaking a consultation on the 'Schedule of Proposed Changes' to the Plan, along with the revised Sustainability Appraisal, update to the Habitats Regulations Assessment Addendum, and associated evidence documents.

This further round of consultation will take place for six weeks from 9am Thursday 27 September to 5pm Friday 9 November 2018 to give all interested parties the opportunity to comment on the published materials before the Inspector commences the formal public hearing sessions.

For more information please visit the [Wiltshire Housing Site Allocations Plan webpage](#).

Close ^

> [Local Plan Review Update](#)

> [Employment Land Review](#)

> [Residential Boaters Survey 2017](#)

> [Data Protection](#)

## In Planning policy

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[Saved policies from District Local Plans](#)

[Chippenham Site Allocations Plan](#)

[Minerals and Waste](#)

[Local Plan Review](#)

[Wiltshire Housing Site Allocations Plan](#)

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## Links



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## Local Plan

The Local Plan acts as a critical tool in guiding decisions about individual development proposals, with the Local Plan acting as the starting-point for considering whether applications can be approved.

In Wiltshire, the Local Plan includes the Wiltshire Core Strategy incorporating saved policies from

# Wiltshire Housing Site Allocations Plan

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## Wiltshire Housing Site Allocations Plan - Focussed consultation on the Schedule of Proposed Changes and associated evidence documents

(including revised Sustainability Appraisal and an update to the Addendum to the Habitats Regulations Assessment)

In July 2018, the council submitted the draft Wiltshire Housing Site Allocations Plan (the Plan), along with a 'Schedule of Proposed Changes' and supporting evidence to the Secretary of State for independent examination. Planning Inspector, Steven Lee BA (Hons) MA MRTPI has been appointed to undertake the examination. Details of all the documents submitted can be found in the section below "The documents submitted to the Secretary of State were as follows"

In August 2018, the council received a procedural letter from the Inspector. In response to that letter, the Council is undertaking a consultation on the 'Schedule of Proposed Changes' to the Plan, along with the revised Sustainability Appraisal, update to the Habitats Regulations Assessment Addendum, and associated evidence documents.

This further round of consultation will take place for six weeks from **9am Thursday 27 September to 5pm Friday 9 November** to give all interested parties the opportunity to comment on the published materials before the Inspector commences the formal public hearing sessions.

[Schedule of Proposed Changes - Consultation Document September 2018 \(EXAM/01\)](#)

[Other consultation documents](#)

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## Schedule of Proposed Changes to the draft WHSAP

### **Wiltshire Housing Site Allocations Plan - Focussed consultation on the Schedule of Proposed Changes and associated evidence documents (including revised Sustainability Appraisal and an update to the Addendum to the Habitats Regulations Assessment)**

In July 2018, the council submitted the draft Wiltshire Housing Site Allocations Plan (the Plan), along with a 'Schedule of Proposed Changes' and supporting evidence to the Secretary of State for independent examination. Planning Inspector, Steven Lee BA (Hons) MA MRTPI has been appointed to undertake the examination. In August 2018, the council received a procedural letter from the Inspector. In response to that letter, the Council is undertaking a consultation on the 'Schedule of Proposed Changes' to the Plan, along with the revised Sustainability Appraisal, update to the Habitats Regulations Assessment Addendum and associated evidence documents.

This further round of consultation will take place for six weeks from **9am Thursday 27 September to 5pm Friday 9 November** to give all interested parties the opportunity to comment on the published materials before the Inspector commences the formal public hearing sessions.

### **Consultation documents**

The consultation documents are as follows (and available to view [below in the 'Supporting Documents'](#)):

- Schedule of Proposed Changes to Wiltshire Housing Site Allocations Plan – Consultation Document September 2018 (EXAM/01);
- Wiltshire Housing Site Allocations Plan Sustainability Appraisal Revised September 2018 (EXAM/02A, EXAM/02A.1, EXAM/02B and EXAM/02C); and
- Update to the Wiltshire Housing Site Allocations Pre-Submission Draft (June 2017) Assessment under the Habitats Regulations Assessment Addendum (September 2018) (EXAM/03)

The following documents also provide the context for the Proposed Changes to the Wiltshire Housing Site Allocations Plan and can be used to help you comment (and also available to view [below in the 'Supporting Documents'](#)):

- Wiltshire Housing Site Allocations Plan Topic Paper 1 – Settlement Boundary Review Methodology (July 2018 Submission version) (TOP/01);
- Wiltshire Housing Site Allocations Plan Topic Paper 2 – Site Selection Process Methodology (July 2018 Submission version) (TOP/02);
- Wiltshire Housing Site Allocations Plan Topic Paper 3 – Housing Land Supply Addendum (July 2018 Submission version) (TOP/03C);
- Wiltshire Housing Site Allocations Plan Topic Paper 4 – Developing Plan Proposals Addendum (July 2018 Submission version) (TOP/04C);
- Wiltshire Housing Site Allocations Plan Community Area Topic Paper Devizes (July 2018 Submission version) (CATP/06);
- Wiltshire Housing Site Allocations Plan Community Area Topic Paper – Malmesbury (July 2018 Submission version) (CATP/07);
- Wiltshire Housing Site Allocations Plan Community Area Topic Paper - Salisbury (July 2018 Submission version) (CATP/13);
- Wiltshire Housing Site Allocations Plan Community Area Topic Paper – Trowbridge (July 2018 Submission version - updated September 2018) (CATP/17a);
- Wiltshire Housing Site Allocations Plan Community Area Topic Paper – Westbury (July 2018 Submission version) (CATP/19);
- Memorandum of Understanding: River Avon Special Area of Conservation Phosphate Neutral Development – Interim Mitigation (May 2018) (HRA/03);
- Wiltshire Housing Site Allocations Plan Heritage Impact Assessment Final Report Prepared by LUC (March 2018) (WHSAP/05);
- Wiltshire Housing Site Allocations draft plan - Stage 4a Site Landscape Assessment Part 2: Salisbury, Tidworth, Trowbridge, Warminster and Westbury Community Areas – Prepared by Wiltshire Council and The Environment Partnership (June 2017) (WHSAP/20);
- Wiltshire Housing Site Allocations draft plan - Stage 4a Site Landscape Assessment Part 3: Omission sites in the Chippenham, Devizes, Malmesbury, Salisbury, Warminster and Westbury Community Areas – Prepared by Wiltshire Council and The Environment Partnership (May 2018) (WHSAP/21);
- Wiltshire Housing Site Allocations Plan Consultation Statement Regulation 22 (1)(c) (July 2018 Submission version) (WHSAP/09);
- Wiltshire Housing Site Allocations Plan Consultation Statement Regulation 22 (1)(c) Appendices M and P (July 2018 Submission version) (WHSAP/11);
- Wiltshire Housing Site Allocations Plan Consultation Statement Regulation 22(1)(c) Appendix Q (July 2018 Submission version) (WHSAP/12) (available online and at the Council's main offices as below);
- Appendix 3 to Cabinet Report 3<sup>rd</sup> July 2018 – Note on Elm Grove Field and Implications for Asset Transfer (July 2018) (WHSAP/04);
- Wiltshire Council - Salisbury Transport Strategy – Draft Strategy Refresh 2018 (July 2018) (WHSAP/08);
- Wiltshire Council - Trowbridge Transport Strategy Refresh – Strategy Refresh 2018 (May 2018) (WHSAP/07); and
- Wiltshire Council Draft minutes of the Cabinet meeting held on 3 July 2018 (DEM/03).

**Note:** You can view all of the documents relating to the Wiltshire Housing Site Allocations Plan in the [Document Library](#). The reference numbers in brackets, e.g. (WHSAP/21), are taken from the [Document Library Index](#).

### **How to respond**

Click on the 'Start Survey' icon below to view the online comment form. In order to comment online you must first [log in](#) or [register](#) if you have not yet done so already.

A simplified [guidance note](#), which is available under the 'Supporting Documents' tab of the box at the bottom of this page, can also be downloaded. The Schedule of Proposed Changes should be read in conjunction with the Wiltshire Housing Site Allocations Plan - Submission Draft Plan July 2018 (WHSAP/01). Representations are invited on the 'soundness' and legal compliance of the Proposed Changes only and should not seek to introduce new matters. Once the consultation has ended the Inspector will consider the responses received on the Proposed Changes and assess whether they raise any issues of 'soundness' or legal compliance.

We welcome your comments via the following means:

- Online via this consultation web site
- by email using the specific representation form under Supporting Documents below and returned to [spatialplanningpolicy@wiltshire.gov.uk](mailto:spatialplanningpolicy@wiltshire.gov.uk); or
- by post in writing to: Spatial Planning, Economic Development & Planning, Wiltshire Council, County Hall, Bythesea Road, Trowbridge, Wiltshire, BA14 8JN.

Please note that copies of all comments (including your personal details) will be made available to the public to view and therefore cannot be treated as confidential. Anonymous representations cannot be accepted.

Any representation received may be accompanied by a request to be notified at a specific address of any of the following:

- that the Wiltshire Housing Site Allocations Plan has been submitted to the Secretary of State for independent examination;
- that the Inspector's Report (including any recommendations) into the Wiltshire Housing Site Allocations Plan has been published; and
- that the Wiltshire Housing Site Allocations Plan has been adopted.

### **Location of documents**

Copies of the consultation documents can be viewed and downloaded:

- under Supporting Documents below; and
- from the Council's website at <http://www.wiltshire.gov.uk/planning-whsap>.

They can also be viewed during normal opening hours at Wiltshire Libraries and the Council's main offices at:

- Monkton Park, Chippenham Wiltshire SN15 1ER;
- Bourne Hill, Salisbury, SP1 3UZ; and
- County Hall, Bythesea Road, Trowbridge BA14 8JN.

### **Next steps and further information**

Following the consultation, the Council will collate the responses received and provide the Inspector with the full responses together with a summary of the main issues raised. Should you require further information on the consultation, please email: [spatialplanningpolicy@wiltshire.gov.uk](mailto:spatialplanningpolicy@wiltshire.gov.uk) or telephone 01225 713223.



**From:** [Communications](#)  
**Subject:** Wiltshire Council: Changes to key future housing plan goes out to consultation  
**Date:** 03 October 2018 16:23:04

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cid:image001.jpg@01D45B25.CDEDF70



**NEWS  
RELEASE**

**3 October 2018**

## **Changes to key future housing plan goes out to consultation**

People will be able to have their say on a series of changes to a key plan that explains how Wiltshire will provide sufficient housing into the future.

The draft Wiltshire Housing Site Allocations Plan proposes to allocate new sites for housing and to maintain a five-year housing land supply in each of Wiltshire's three Housing Market Areas (HMA) up to 2026.

Housing growth is a government priority and all local authorities have to prepare plans to identify sites for development.

The plan builds on the framework already provided by the long-term Wiltshire Core Strategy, which provides an over-arching planning policy and details the overall principles for development in Wiltshire.

Much of the housing growth for Wiltshire has already been delivered or identified, and the proposed plan brings forward further sites, designed to ensure the scale of growth appropriate for Wiltshire is managed and directed in the most sustainable locations.

In July, the draft plan was submitted with supporting evidence and a "schedule of proposed changes" to the Secretary of State for independent examination.

Copies of the consultation documents can be [viewed and downloaded via our website](#).

People are encouraged to comment [via the consultation portal](#).

This further round of focussed consultation will take place until 5pm on Friday 9 November to give all interested parties the opportunity to comment on the proposed changes to the plan and associated documents before the Inspector begins the formal public hearing sessions.

Toby Sturgis, cabinet member for planning said: “This plan ensures development takes place in the most appropriate locations in Wiltshire.

“We are grateful to everyone who gave their views for last year’s consultation on the actual plan. This time we are consulting on specific changes to that document and I would encourage people to visit our website and tell us their views.”

The Schedule of Proposed Changes can be read in conjunction with the [Wiltshire Housing Site Allocations Plan - Submission Draft Plan July 2018 \(WHSAP/01\)](#).

Once the consultation has ended, the inspector will consider the responses received and assess whether they raise any issues for discussion at the forthcoming public hearings.

The consultation can also be viewed during normal opening hours at Wiltshire Council Libraries and the council’s main offices at:

- Monkton Park, Chippenham Wiltshire SN15 1ER;
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Please note that copies of all comments will be made available to the public to view and therefore cannot be treated as confidential. Anonymous representations cannot be accepted.

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-ends-

#### **Notes to editors:**

For more information please contact the Wiltshire Council communications team on 01225 713115/6 or 01225 713370.

#### **For political comment:**

Conservatives: Toby Sturgis [toby.sturgis@wiltshire.gov.uk](mailto:toby.sturgis@wiltshire.gov.uk)

Liberal Democrats: Ian Thorn [ian.thorn@wiltshire.gov.uk](mailto:ian.thorn@wiltshire.gov.uk)

Labour: Ricky Rogers [ricky.rogers@wiltshire.gov.uk](mailto:ricky.rogers@wiltshire.gov.uk)

Independent: Ernie Clark [ernie.clark@wiltshire.gov.uk](mailto:ernie.clark@wiltshire.gov.uk)

'Elected Wire' – email communication (extract) 5<sup>th</sup> October 2018:

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**Wiltshire Housing Site Allocations Plan examination – consultation on the schedule of proposed changes**

Following our previous message to you regarding progress on the Wiltshire Housing Site Allocations Plan, we wanted to let you know the consultation is now live for comments on the Schedule of Proposed Changes and associated documents.

The consultation starts today and ends at 5pm on Friday 9 November. This will give all interested parties the opportunity to comment on the published materials before the inspector begins the formal public hearing sessions.

Copies of the consultation documents can be views and downloaded via [our website](#).

People are encouraged to comment via the [consultation portal](#).

Following the consultation, we will collate the responses received and provide the inspector with the full responses, together with a summary of the main issues raised. The inspector will consider the responses received.

We will continue to publish all documents related to the examination on the webpage and will keep you updated throughout the process.

For more information on the consultation, please email [spatialplanningpolicy@wiltshire.gov.uk](mailto:spatialplanningpolicy@wiltshire.gov.uk) or call 01225 713223.

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'Elected Wire' – email communication (extract) 12<sup>th</sup> October 2018:

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**Wiltshire Housing Site Allocations Plan examination – consultation on the schedule of proposed changes**

Following our previous message to you regarding progress on the Wiltshire Housing Site Allocations Plan, we wanted to let you know the consultation is now live for comments on the schedule of proposed changes and associated documents.

The consultation is underway and ends at 5pm on Friday 9 November. This will give all interested parties the opportunity to comment on the published materials before the inspector begins the formal public hearing sessions.

Copies of the consultation documents can be views and downloaded via [our website](#).

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Following the consultation, we will collate the responses received and provide the inspector with the full responses and a summary of the main issues raised. The inspector will consider the responses received.

We will continue to publish all documents related to the examination on the webpage and will keep you updated throughout the process.

More information contact [spatialplanningpolicy@wiltshire.gov.uk](mailto:spatialplanningpolicy@wiltshire.gov.uk) (01225 713223)

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## Draft Housing Site Allocations Plan – focused consultation to support the examination

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The draft Housing Site Allocations Plan sets out proposals for new sites for housing to help maintain a five-year housing land supply in each of Wiltshire's three Housing Market Areas up to 2026.

Housing growth is a government priority and all local authorities must prepare plans to identify sites for such development. The draft plan builds on the framework already provided by the Wiltshire Core Strategy for where development should take place.

In July 2018, following wide consultation, the draft plan was submitted with a "schedule of proposed changes" and supporting evidence to the [Secretary of State for independent examination](#). Details of all the documents submitted can be found on the Council's website at the following address: <http://www.wiltshire.gov.uk/planning-whsap>

In August 2018, the council received a procedural letter from the Inspector. In response to that letter, the Council is undertaking consultation on the 'Schedule of Proposed Changes' to the Plan and associated supporting evidence documents.

This further round of focussed consultation will take place for six weeks from **9am Thursday 27 September to 5pm Friday 9<sup>th</sup> November** to give all interested parties the opportunity to comment on the published materials before the Inspector commences the formal public hearing sessions.

The Schedule of Proposed Changes should be read in conjunction with the [Wiltshire Housing Site Allocations Plan - Submission Draft Plan July 2018 \(WHSAP/01\)](#).

Representations are invited on the 'soundness' and legal compliance of the Proposed Changes only and should not seek to introduce new matters. Once the consultation has ended the Inspector will consider the responses received on the proposed changes and assess whether they raise any issues of 'soundness' or legal compliance.

The council has also produced a Revised Sustainability Appraisal (SA) (EXAM/02A, EXAM/02A.1, EXAM/02B and EXAM/02C) and an Update to the Addendum to the 'Wiltshire Housing Site Allocations Pre-Submission Draft (June 2011) Assessment under Habitats Regulations': September 2018 (EXAM/03). Comments can also be made on these during the consultation period.

We have produced a number of evidence documents, which can be referred to in commenting on the Schedule of Proposed Changes. These documents are listed in the final column of that Schedule.

### Location of documents

Copies of the consultation documents can be viewed and downloaded at the following addresses:

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### **How to respond**

Comments are only invited on the above matters and should not repeat any previous representations that you have made during the draft Wiltshire Housing Site Allocations Plan consultation (14 July 2017 to 22 September 2017), as these have already been sent to the Inspector.

A guidance note, is available for download under the ['Supporting Documents' tab](#) of the Consultation Portal.

We welcome your comments via the following means, although direct input via the portal / email is the preferred method of communication:

- Online via this [consultation web site](#);
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Appendix I  
List of Wiltshire Libraries

<b>Wiltshire Libraries</b>		
<b>Library</b>	<b>Address</b>	<b>Opening Times</b>
Aldbourn Library	South Street,	Monday & Thursday - 2.00pm to 5.00pm and 6.00pm to 8.00pm
	Aldbourn,	Tuesday - 10.00am to 12.00pm*
	Marlborough.	Wednesday, Friday, Saturday & Sunday - Closed
	SN8 2DW	
	Tel:01672 540632	
Amesbury Library	Smithfield Street,	Monday - 2.00pm to 7.00pm
	Amesbury,	Tuesday & Friday - 9.30am to 5.00pm
	SP4 7AL	Wednesday & Sunday - Closed
	Tel: 01980 623491	Thursday - 9.30am to 7.00pm
		Saturday - 9.30am to 1.00pm
Box Library	Selwyn Hall,	Monday - 2.00pm to 5.00pm
	Valens Terrace,	Tuesday & Sunday - Closed
	Box.	Wednesday & Saturday - 10.00am to 12.00pm
	SN13 8NT	Thursday - 10.00am to 1.00pm
	Tel: 01225 742256	Friday - 2.00pm to 5.00pm
Bradford On Avon Library	Bridge Street,	Monday - 10.00am to 7.00pm
	Bradford on Avon.	Tuesday & Sunday - Closed
	BA15 1BY	Wednesday & Friday - 9.30am to 5.00pm
	Tel: 01225 863280 or 01225 868127	Thursday - 9.30am to 7.00pm
		Saturday - 9.30am to 4.00pm

Calne Community Hub and Library	The Strand,	Monday - 8.00am to 10.00am* 10.00am to 7.00pm
	Calne.	Tuesday & Thursday - 8.00am to 9.30am* 9.30am to 5.00pm
	SN11 0JU	Wednesday - 8.00am to 9.30am* 10.00am to 4.00pm**
	Tel: 01249 813128	Friday - 8.00am to 9.30am* 9.30am to 7.00pm
		Saturday - 9.00am to 9.30am* 9.30am to 4.00pm
		Sunday – Closed
		*Unstaffed self-service session **Community hub self-service session
Chippenham Library	Timber Street,	Monday - 10.00am to 7.00pm
	Chippenham.	Tuesday & Saturday - 9.00am to 5.00pm
	SN15 3EJ	Wednesday - 9.00am to 1.00pm
	Tel: 01249 650536	Thursday & Friday - 9.00am to 7.00pm
		Sunday - Closed
Corsham Library	Springfield Community Campus,	Open for self-service from Monday to Friday 7.00am to 10.00pm, Saturday 8.00am to 6.00pm and Sunday 8.30am to 9.00pm. The times below are staffed sessions.
	Corsham	Monday & Friday - 9.00am to 7.00pm
	SN13 9DN	Tuesday, Wednesday, Thursday & Saturday - 9.00am to 5.00pm
	Tel: 01249 713159	
Cricklade Library	113 High Street	Monday - 2.00pm to 5.00pm*
	Cricklade,	Tuesday - 10.00am to 1.00pm
	Swindon	Wednesday - 2.00pm to 5.00pm*

	SN6 6AE	Thursday - 2.00pm to 7.00pm
	Tel: 01793 750694	Friday - 2.00pm to 5.00pm
		Saturday - 10.00am to 1.00pm
		Sunday – Closed
		*Volunteer operated sessions
Devizes Library	Sheep Street,	Monday - 10.00am to 7.00pm
	Devizes.	Tuesday & Friday - 9.30am to 5.00pm
	SN10 1DL	Wednesday - 9.30am to 12.30pm
	Tel: 01380 726878	Saturday - 9.30am to 4.00pm
		Sunday - Closed
Downton Library	Church Leat,	Monday - 2.00pm to 7.00pm
	Downton,	Tuesday & Wednesday - 2.00pm to 5.00pm*
	Salisbury.	Thursday - 10.00am to 1.00pm and 1.00pm to 5.00pm*
	SP5 3PD	Friday - 2.00pm to 5.00pm
	Tel: 01725 511003	Sunday – Closed
		* Volunteer operated sessions.
Durrington Library	75 Bulford Road, Durrington,	Monday, Wednesday & Friday - 10.00am to 5.00pm
	Salisbury.	Tuesday, Thursday & Sunday - Closed
	SP4 8EU	Saturday - 10.00am to 1.00pm
	Tel: 01980 652672	
Ludgershall Library	Memorial Hall,	Monday, Thursday, Saturday & Sunday - Closed
	Andover Road,	Tuesday - 2.00pm to 7.00pm
	Ludgershall.	Wednesday - 2.00pm to 5.00pm
	SP11 9LZ	Friday - 9.30am to 12.30pm
	Tel: 01264 790350	

Lyneham Library	Memorial Hall,	Monday - 2.00pm to 7.00pm
	Lyneham,	Tuesday, Thursday & Friday - 2.00pm to 5.00pm
	Chippenham.	Wednesday & Sunday - Closed
	SN15 4PR	Saturday - 10.00am to 12.00pm
	Tel: 01249 890230	
Malmesbury Library	Cross Hayes, Malmesbury.	Monday - 2.00pm to 7.00pm
	SN16 9BG	Tuesday & Wednesday - 9.30am to 5.00pm
	Tel: 01666 823611	Friday - 9.30am to 7.00pm
		Saturday - 9.30am to 1.00pm
Market Lavington Library	High Street,	Monday, Wednesday, Thursday, Saturday and Sunday - Closed
	Market Lavington,	Tuesday - 2.00pm to 7.00pm
	Devizes.	Friday - 10.00am to 5.00pm
	SN10 4AG	
	Tel: 01380 818358	
Marlborough Library	91 High Street, Marlborough.	Monday - 2.00pm to 7.00pm
	SN8 1HD	Tuesday & Sunday - Closed
	Tel: 01672 512663	Thursday - 9.30am to 7.00pm
		Saturday - 9.30am to 1.00pm
Melksham Library	Lowbourne,	Monday - 10.00am to 7.00pm
	Melksham.	Tuesday & Friday - 9.30am to 5.00pm
	SN12 7DZ	Wednesday & Sunday - Closed
	Tel: 01225 702039	Saturday - 9.30am to 4.00pm
Mere Library	Barton Lane,	Monday - 10.00am to 2.00pm* and 2.00pm to 7.00pm
	Mere,	Tuesday, Thursday & Friday - 9.30am to 5.00pm
	Warminster.	Wednesday - 9.30am to 1.00pm*

	BA12 6JA	Saturday - 9.30am to 1.00pm
	Tel: 01747 860546	
Netheravon Library	High Street,	Monday - 1.00pm to 7.00pm
	Netheravon,	Tuesday, Wednesday, Friday, Saturday & Sunday - Closed
	Salisbury.	Thursday - 1.00pm to 5.00pm
	SP4 9PJ	
	Tel: 01980 670018	
Pewsey Library	Aston Close,	Monday - 2.00pm to 5.00pm*
	Pewsey.	Tuesday - 10.00am to 1.00pm and 2.00pm to 7.00pm
	SN9 5EQ	Wednesday - 10.00am to 1.00pm*
	Tel: 01672 562265	Friday - 2.00pm to 5.00pm
		Saturday - 10.00am to 1.00pm
		Sunday – Closed
		* Volunteer operated sessions.
Purton Library	1 High Street, Purton, Swindon.	Monday & Friday - 2.00pm to 5.00pm
	SN5 4AA	Tuesday - 2.00pm to 7.00pm
	Tel: 01793 770870	Thursday, Saturday & Sunday – Closed
Ramsbury Library	Chapel House,	Monday & Thursday - 2.00pm to 5.00pm
	High Street,	Tuesday, Friday & Sunday - Closed
	Ramsbury,	Wednesday & Saturday - 10.00am to 12.00pm
	Marlborough.	
	SN8 2QP	
	Tel: 01672 520364	
Royal Wootton Bassett Library	Borough Fields, Royal Wootton Bassett,	Monday - 10.00am to 7.00pm

	Swindon.	Tuesday & Sunday - Closed
	SN4 7AX	Wednesday - 9.30am to 7.00pm
	Tel: 01793 853249	Saturday - 9.30am to 4.00pm
Salisbury Library	Market Place,	Monday - 10.00am to 7.00pm
	Salisbury.	Tuesday & Friday - 9.00am to 7.00pm
	SP1 1BL	Wednesday, Thursday & Saturday - 9.00am to 5.00pm
	Tel: 01722 324145	
Tidworth Library	Tidworth Leisure Centre, Nadder Road,	Monday, Wednesday & Friday - 10.00am to 1.00pm and 2.00pm to 5.00pm
	Tidworth.	Tuesday & Thursday - 2.00pm to 7.00pm
	SP9 7QA	Saturday - 10.00am to 1.00pm
	Tel: 01980 843460	
Tisbury Library	Nadder Centre,	Open for self-service Monday to Friday 7.00am to 9.00pm and 8.00am to 5.00pm at the weekend. The times below are volunteer operated sessions.
	Tisbury,	Monday, Tuesday & Thursday - 2.00pm to 5.00pm
	SP3 6HJ	Wednesday & Friday - 10.00am to 1.00pm 2.00pm to 5.00pm
	Tel: 01747 870469	Sunday - Closed
Trowbridge Library	Ground Floor,	Monday, Thursday and Friday - 8.30am to 7.00pm
	County Hall,	Tuesday & Wednesday - 8.30am to 5.30pm
	Bythesea Road,	Saturday - 9.00am to 5.00pm
	Trowbridge.	Sunday - Closed
	BA14 8JN	
	Tel: 01225 716700	



Warminster Library	Three Horseshoes Walk, Warminster.	Monday - 10.00am to 7.00pm
	BA12 9BT	Tuesday & Friday - 9.30am to 5.00pm
	Tel: 01985 216022	Thursday - 9.30am to 7.00pm
		Saturday - 9.30am to 4.00pm
		Sunday - Closed
Westbury Library	Westbury House,	Monday - 2.00pm to 7.00pm
	Edward Street,	Tuesday & Friday - 9.30am to 5.00pm
	Westbury.	Wednesday & Sunday - Closed
	BA13 3BD	Thursday - 9.30am to 7.00pm
	Tel:01373 822294	Sunday - Closed
Wilton Library	South Street,	Monday, Wednesday & Sunday - Closed
	Wilton,	Tuesday - 10.00am to 2.00pm* and 2.00pm to 7.00pm
	Salisbury.	Thursday - 10.00am to 1.00pm and 1.00pm to 5.00pm*
	SP2 0JS	Friday - 10.00am to 2.00pm* and 2.00pm to 5.00pm
		* Volunteer operated sessions

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>

Information about Wiltshire Council services can be made available in other formats (such as large print or audio) and languages on request. Please contact the council on 0300 456 0100, by textphone on (01225) 712500 or by email on [customerservices@wiltshire.gov.uk](mailto:customerservices@wiltshire.gov.uk).