

Wiltshire Council

Cabinet

20 June 2017

Subject: Draft Wiltshire Site Allocations Plan

Cabinet Member: Councillor Toby Sturgis - Planning and Strategic Asset Management

Key Decision: Yes

Executive Summary

The Wiltshire Core Strategy (adopted January 2015) plans for housing to come forward through a number of sources including: its strategic site allocations, neighbourhood planning, planning applications and subsequent site allocations plans. The Council's Local Development Scheme identified the need to prepare two site allocations plans which, as recognised in the Wiltshire Core Strategy, would allocate further sites for new homes and also review settlement boundaries. The Chippenham Site Allocations Plan was adopted by Council on 16 May 2017 and plans for additional new homes at Chippenham. A Draft Wiltshire Site Allocations Plan has now been prepared for the rest of Wiltshire to:

- (i) Identify, where necessary, new allocations for housing at settlements to provide for additional housing to ensure the delivery of the Wiltshire Core Strategy housing requirement of at least 42,000 dwellings (2006 to 2026) and maintain a five year land supply in each of Wiltshire's three Housing Market Areas over the period to 2026; and
- (ii) Review, where necessary, settlement boundaries (or 'limits of development') in relation to the Principal Settlements of Salisbury and Trowbridge, Market Towns, Local Service Centres and Large Villages.

The Draft Plan will complement the Chippenham Site Allocations Plan and neighbourhood planning. The overall level of growth proposed for allocation in the Draft Plan is 2,465 homes; with 1,205 homes in the North and West HMA (14 sites), 350 homes in the East HMA (4 sites) and 910 homes in the South HMA (6 sites).

Settlement boundaries have been reviewed to ensure that they properly reflect development that has occurred since they were first established and a consistent approach is taken across Wiltshire. This is with the exception of those boundaries that have recently been reviewed through sufficiently advanced Neighbourhood Plans and do not require further updates to take into consideration implemented

development.

At this stage of the process, the Council is publishing what it considers to be a sound plan and should be able to proceed to the submission stage following the consultation. At the submission stage the Draft Plan is formally submitted to the Secretary of State, who will appoint an Inspector to examine the Draft Plan in terms of its soundness. In examining the document the Inspector will consider the robustness of the evidence base and representations received at this formal stage of consultation.

Publication of the Draft Plan for consultation is proposed to start during the week commencing 10 July for ten weeks. Additional time to the statutory period of at least 6 weeks is proposed to allow for the consultation running over the summer period. Consideration of the Draft Plan by Cabinet has been delayed due to the announcement of the General Election and purdah, which will have a knock on effect to the overall timetable for the Plan.

Proposals

That Cabinet:

- (i) Approves the Draft Wiltshire Housing Site Allocations Plan, as set out in **Appendix 1** subject to amendment in (ii);
- (ii) Authorises the Associate Director for Economic Development and Planning in consultation with the Cabinet Member for Planning and Strategic Asset Management to: make any necessary minor changes to the Draft Wiltshire Housing Site Allocations Plan in the interests of clarity and accuracy before it is published; make arrangements for, and undertake statutory consultation for a 10 week period starting during the week commencing 10 July 2017.

Reason for Proposals

To ensure that progress continues to be made on maintaining an up-to-date development plan for Wiltshire, in line with the Council's Local Development Scheme and statutory requirements. In accordance with legislative requirements, following the consultation, Council will need to approve the submission of the Draft Wiltshire Housing Site Allocations Plan to the Secretary of State for examination.

Dr. Carlton Brand
Corporate Director

Wiltshire Council

Cabinet

20 June 2017

Subject: Draft Wiltshire Housing Site Allocations Plan

Cabinet Member: Councillor Toby Sturgis, - Planning and Strategic Asset Management

Key Decision: Yes

Purpose of Report

1. To:
 - (i) Seek Cabinet's approval for the Draft Wiltshire Housing Site Allocations Plan.
 - (ii) Seek delegated authority to make arrangements for its consultation and the next steps.

Relevance to the Council's Business Plan

2. Progression of the plan is important to realising the overarching aims of the Business Plan 2013-2017 of delivering stronger and more resilient communities through the identification of land to deliver new homes, to complement the Wiltshire Core Strategy.

Background

3. The Wiltshire Core Strategy, adopted January 2015, plans for housing to come forward through a number of sources including: its strategic site allocations, neighbourhood planning and planning applications; as well as subsequent site allocations development plan documents. It also recognised that settlement boundaries (or 'limits of development') would need to be reviewed to ensure they are up to date. The need to bring forward new homes through site allocation development plan documents was identified to provide a surety of housing supply throughout the Plan period to 2026. Council on 16 May 2017 adopted the Chippenham Site Allocations Plan, which reviews the settlement boundary for Chippenham and allocates land for 2,050 homes at the town. The Wiltshire Housing Site Allocations Plan complements the Chippenham Plan in reviewing settlement boundaries and providing for additional homes where needed elsewhere in the County.

4. The Council's Local Development Scheme (LDS) approved by Cabinet early 2014 first introduced the commitment to prepare the Wiltshire Housing Site Allocations Plan (hereafter referred to as the 'Draft Plan'). The LDS was updated in December 2016 and sets out the current timeline for preparation of the Plan. Consultation was programmed to commence June 2017, with submission to the Secretary of State programmed for February 2018. However, consideration of the Draft Plan by Cabinet has been delayed due to the announcement of the General Election and purdah, which will have a knock on effect to the overall timetable for the Plan.
5. The Draft Plan has been prepared in general conformity with the Wiltshire Core Strategy and will:
 - (i) Identify, where necessary, new allocations for housing at settlements to provide for additional housing to ensure the delivery of the Wiltshire Core Strategy housing requirement of at least 42,000 dwellings (2006 to 2026) and maintain a five year land supply in each of Wiltshire's three Housing Market Areas over the period to 2026; and
 - (ii) Revise, where necessary, settlement boundaries (or 'limits of development') in relation to the Principal Settlements of Salisbury and Trowbridge, Market Towns (12 in total), Local Service Centres (7 in total) and Large Villages (66 in total).

Small villages, in accordance with the Core Strategy, do not have settlement boundaries and only have the potential for limited infill development. As such, they are not considered through the Draft Plan.

6. The Settlement Strategy (Core Policy 1) and the Delivery Strategy (Core Policy 2) together with the Area Strategy Policies (Section 5) guide where and how much development should take place to provide for a sustainable pattern of growth. Core Policy 2 sets out housing requirements by Housing Market Area (HMA) and indicative requirements are provided in the Area Strategy Policies for each Community Area, the Principal Settlements and Market Towns and, in the South Wiltshire HMA the Local Service Centres. These are not intended to be prescriptive minima or maxima and instead they are an indication of the general scale of growth appropriate for each area and settlement during the plan period; and are expressed as 'approximate' or 'about' figures. In accordance with Core Policy 2, sites for housing development may come forward through new allocations on the edge of settlement boundaries where they are identified in neighbourhood or site allocations plans.

Main Considerations for the Council

7. The starting point for the Draft Plan is the requirements set out in the Wiltshire Core Strategy. As a subsidiary document to the Core Strategy, with

a particular purpose, the Draft Plan does not provide an opportunity to revisit the strategic policies within the core strategy, for example, the status of settlements or housing requirements.

9. Work on the Draft Plan commenced early March 2014, when in accordance with statutory requirements the formal Regulation 18 consultation on the scope of the Plan was carried out. At the same time, there was a call for sites to enable interested parties to put forward land for consideration through the Plan. Informal targeted consultation was undertaken on: draft proposals for amending settlement boundaries (July to September 2014); draft site selection methodology and initial site options (February to March 2015); and further consultation on the approach to large villages (June to August 2015). Full details of the consultation, together with the representations received and the Council's response is set out in the report on the Council's website at [this link](#).

Settlement Boundary Review

10. The purpose of settlement boundaries and methodology for their review is set out in **Appendix 2** (Topic Paper 1: Settlement Boundary Review Methodology). The Wiltshire Core Strategy uses settlement boundaries as a policy tool for managing how development should take place. Boundaries generally relate to the built up area of settlements and need to be reviewed to ensure that they properly reflect development that has occurred since they were first established - these may relate to more than one or parish. There is a general presumption in favour of development within settlement boundaries, with development outside only supported in appropriate circumstances determined by policies within the Core Strategy (Core Policy 2). This includes the allocation of land through site allocation plans and neighbourhood plans.
11. All boundaries have been reviewed in order to ensure a consistent approach, with the exception of those boundaries that have recently been reviewed through sufficiently advanced Neighbourhood Plans and do not require further updates to take into consideration implemented development.

Proposed Site Allocations

12. During the course of the Draft Plan's preparation, new sites for housing outside of settlement boundaries have been granted planning permission and to a lesser extent identified through neighbourhood plans. This has reduced the residual requirement at each of the Housing Market Areas (HMAs). Table 1 below sets out the housing requirements for Wiltshire's HMAs as set out in Core Policy 2 together with progress towards meeting those requirements. This has a base date of 1 April 2017 and has been forecast using the Council's recently published Housing Land Supply Statement (March 2017). While on the face of it, with the exception of the North and West HMA, there appears to be only a small proportion of the requirement left to be planned

for this does not take into consideration the need to maintain a five year land supply (with buffer) across the Plan period - a requirement of the National Planning Policy Framework (NPPF). Table 2 illustrates the current five year land supply position year on year without any new allocations.

13. The residual remaining requirement is 1,335 across the HMAs, which compares with 2,465 homes proposed to be allocated in the Plan (see paragraph 19 below - Table 3 illustrates the effect of the allocations on the five year land supply).

Area	Requirement (at least) 2006-2026	Completions 2006-2017	Developable commitments 2017-2026	Remaining requirement
East Wiltshire HMA	5,940	3,497	2,273	170
North and West Wiltshire HMA ¹	24,740	12,603	11,566	571
South Wiltshire HMA	10,420	5,067	4,759	594

Table 1: Housing Land supply for Wiltshire’s HMAs (forecast at 1 April 2017)

HMA	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26
East	8.47	8.18	8.32	10.11	13.64	10.79	8.21	6.29	4.94
North & West	6.62	6.80	6.81	6.55	6.48	6.11	5.42	4.60	3.82
South	5.64	5.57	5.42	5.35	5.28	5.13	4.59	3.83	2.97

Table 2: Five year housing land supply position by HMA (2017-2026)

14. The methodology for site selection involves a six stage approach and is set out in **Appendix 3** (Topic Paper 2 - Site Selection Process Methodology). This has been developed following feedback from the targeted consultation with parish and town councils and the development industry. Stage 1 of the process identifies 'areas of search' where the Plan should look to allocate sites for housing development. These are generally those 'areas' (see paragraph 6) where currently dwelling completions and commitments fall short of the indicative requirements set out in the Core Strategy and where there is the need to bring forward sites through the Plan in order to support the role and function of settlements.
15. In order to be sure of maintaining a five year land supply, the Plan aims to

provide for at least six years supply in each remaining year of the Plan period (i.e. five years plus highest buffer of 20% set out in the NPPF).

Draft Plan

16. The Draft Wiltshire Housing Sites Allocations Plan is set out in **Appendix 1** and is structured as follows:
 - (i) **Introduction** (Section 1) and **Context** (Section 2): Introductory sections to the Plan, which sets out background, policy context, supporting evidence and how to comment.
 - (ii) **Plan Objectives** (Section 3) and **Housing Delivery Strategy** (Section 4): Clarifies the objectives of the Plan including the settlement boundary review and the approach, how many homes are needed and where, the methodology for site selection and introduces the proposed allocations.
 - (iii) **Site Allocations** (Section 5): Sets out the policies, explanatory text and proposed changes to the policies maps relating to the proposed allocations.
 - (iv) **Settlement Boundary Review** (Section 6 and Appendix 1): Summarises the methodology for the boundary review and proposed changes to the policies maps.
 - (v) **Monitoring and Implementation** (Section 7): Clarifies how delivery of the Plan will be monitored.
17. A number of evidence papers that have informed the Draft Plan will be published alongside it. These have been made available as part of the Agenda papers, as follows:
 - (i) Topic Paper 1: Settlement Boundary Review Methodology (Appendix 2)
 - (ii) Topic Paper 2: Site Selection Methodology (Appendix 3)
 - (iii) Topic Paper 3: Housing Land Supply (Appendix 4)
 - (iv) Topic Paper 4: Developing Plan Proposals (Appendix 5)
 - (v) Topic Paper 5: Assessment of Viability (BNP Paribas) (Appendix 6)
18. The application of the methodology and findings are set out by Community Area in individual evidence papers informing the Plan (referred to as Community Area Topic Papers). These have been made available alongside the Agenda papers on the Council's website at [this link](#). Further justification for the proposed allocations is set out in **Appendix 5**.
19. The overall level of growth allocated in the Plan is 2,465 homes; with 1,205

homes in the North and West HMA (14 sites), 350 homes in the East HMA (4 sites) and 910 in the South HMA (6 sites). Table 3 below illustrates the effect of the allocations on the five year land supply).

HMA	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26
East	9.18	9.11	9.75	12.20	22.44	20.18	14.01	9.81	7.45
North & West									
West	7.15	7.54	7.64	7.54	7.85	7.92	7.48	6.54	5.30
South	6.09	6.30	6.43	6.65	6.88	7.13	6.70	5.87	4.75

Table 3: Five year housing land supply position by HMA (2017-2026) including proposed allocations

20. Alongside the above evidence, the following documents will also be made available when the Draft Plan is published:
- (i) A **Habitats Regulations Assessment (HRA)** has been undertaken to consider whether the Draft Plan is likely to have a significant effect on the integrity of internationally important wildlife sites in line with European legislation. This has confirmed that with mitigation there are unlikely to be adverse effects. In preparing the Draft Plan consideration has been given to effects on European designations, and the Community Area Topic Papers illustrate where this has influenced the proposals within the Draft Plan.
 - (ii) Draft **Sustainability Appraisal (SA) Report**: to demonstrate that the Draft Plan is sustainable and suggests mitigation measures to avoid or reduce negative impacts through an appraisal of reasonable options. SA has been integral to the sites selection process and the Community Area Topic Papers refer to the SA indicating how it has helped shape the proposals in the Draft Plan.
 - (iii) **Consultation Statement**: to set out the consultation that has been undertaken and has informed the preparation of the Draft Plan. Targeted consultation has been undertaken appropriate to this Draft Plan in accordance with the Council's Statement of Community Involvement. This document (Statement of Early Community Engagement) accompanies the Agenda papers and is available via the following link: [this link](#).

Consultation Arrangements

21. Preparations will be made to publish the Draft Wiltshire Housing Site Allocations Plan and supporting documents for a period of ten weeks in accordance with the Council's Statement of Community Involvement and statutory requirements. The consultation will start as soon as possible during the week commencing 10 July 2017 and allow for a ten week consultation period. It will include:

- (i) Early notification to Parish and Town Councils following Cabinet approval.
- (ii) Letter or email to consultees on the Spatial Planning consultation database, providing notification of the consultation.
- (iii) Online publication on the Council's website including consultation portal.
- (iv) Publication of advertisement in local newspapers to cover Wiltshire and the Parish/Town Council Newsletter.
- (v) Publication of press release on 'Our Community Matters' websites.
- (vi) Notification of the consultation to be distributed through Community Area Board networks and via Chairman's announcements at Board meetings leading up to and during the consultation period as necessary.
- (vii) Documents being made available for viewing at the Council's main office hubs (Chippenham, Devizes, Salisbury and Trowbridge) and at libraries.
- (iii) Four public exhibitions in Chippenham (17 July), Salisbury (19 July), Devizes (24 July) and Trowbridge (26 July) from 12 noon until 7pm, with Officers in attendance to answer questions.

Next Steps

22. Once the consultation has closed all responses will be considered in order to determine whether any changes to the Draft Plan are required. The outcome of the consultation following consideration of responses will be reported back to Cabinet before the Draft Plan and accompanying documents (as set out in the Legal Implications section) go to Council for approval. Following Council approval, the Plan will be submitted to the Secretary of State. The Local Development Scheme anticipated submission February 2018, although given the delays as outlined in paragraph 4 submission is likely to be around May 2018. Once submitted to the Secretary of State, the process of independent examination by a Government appointed Inspector will take place.

Safeguarding Implications

23. There are no safeguarding implications as a direct result of this proposal.

Public Health Implications

24. Planning for sustainable development to meet the employment, housing and infrastructure needs of communities helps foster their wellbeing. Well planned development, including appropriate infrastructure, supports health and well being of local communities, for example through the provision of green infrastructure and infrastructure to encourage walking and cycling as means of travel.

Procurement Implications

25. There are no further procurement implications as a direct result of this

proposal.

Environmental and Climate Change Considerations

26. Spatial Planning has implications for the natural, economic and social environment. A Sustainability Appraisal incorporating Strategic Environmental Assessment has been undertaken during the preparation of the Draft Plan ensuring that negative environmental impacts are avoided and sustainable development can be delivered. A Habitat Regulations Assessment has also been undertaken (see paragraph 20 above).
27. Managing climate change is one of the cross cutting objectives of the Wiltshire Core Strategy and therefore a principle reflected in this Draft Plan. In particular, it seeks to deliver the most sustainable pattern of growth to help promote self-containment as far as possible and minimise the need to travel, particularly by the private car. Work on flood risk has been undertaken as part of the process to ensure that development is not vulnerable to flooding or increases the risk of flooding elsewhere.
28. The Wiltshire Housing Site Allocations Plan will become part of the development plan for Wiltshire, alongside the Wiltshire Core Strategy, once adopted. The specific policies within the Core Strategy to protect and enhance the environment and protect against climate change will be relevant in the consideration of the planning applications that result from the Plan.

Equalities Impact of the Proposal

29. The Draft Plan aims to positively manage growth in accordance with the Wiltshire Core Strategy and seek to ensure sufficient homes are available to meet housing needs. The proposed consultation has been designed to help ensure that everyone has the opportunity to comment on the Draft Plan.
30. When the Draft Plan is submitted to the Secretary of State for examination, Regulations require that it will be accompanied by an Equalities Impact Assessment undertaken as part of a process to help the Council ensure that it discharges its section 149 duty under the Equality Act 2010 to have due regard to the need to:
 - eliminate discrimination;
 - advance equality of opportunity between persons who share a “relevant protected characteristic” and persons who do not share it;
 - foster good relations between persons who share a “relevant protected characteristic” and persons who do not share it.

Risk Assessment

31. Implementation of the Wiltshire Core Strategy is dependent on the progression of the Wiltshire Housing Site Allocations Plan to ensure that sufficient land is available for housing development and settlement boundaries are up to date.
32. A plan led approach to development in Wiltshire will enable the most sustainable sites for development to be identified, minimising impact on the local environment and maximising benefits of development rather than a piecemeal speculative approach.

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

33. There is a considerable amount of developer interest in Wiltshire. This means that in the absence of a Plan, the Council would need to consider speculative applications on a case by case basis impacting on the Council's ability to plan effectively for growth in the most sustainable way. Speculative applications can lead to additional costs for the Council through appeals and divert capacity away from core business.
34. Progression of the Draft Plan will help ensure that the Council is able to maintain and demonstrate a five year supply of housing land, in accordance with the requirements of the Government's National Planning Policy Framework, through the identification of sites for development. Without a five year land supply the Council is less able to defend against speculative development proposals. Maintaining a five year supply of housing should also ensure that the scale of growth appropriate for Wiltshire is managed and directed at the most sustainable locations and allocated proportionately to the scale, role and function of specific settlements.

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

35. There is a reputational risk to the Council as criticism may be attracted from local people who do not want to see developments close to where they live or areas they value. As part of the consultation arrangements local people will have the opportunity to find out more about the proposals and put forward any comments through the consultation.
36. See legal implications below for further risks.

Financial Implications

37. The financial implications of the preparation and consultation of the Draft Plan will be met from existing budget and income provision from the Economic Development and Planning budget during 2017/18. Provision will need to be made in the 2018/19 budget for costs associated with the submission and examination of the Draft Plan.
38. Progression of the Draft Plan will help bring forward new sites for housing,

thereby enabling the Council to benefit from revenue and capital associated with the delivery of new homes including contributing to the Council's Council Tax base.

Legal Implications

39. In accordance with the Planning and Compulsory Purchase Act 2004 (as amended), the Council has a statutory duty to prepare planning policy and maintain up to date policy, which is reinforced through the National Planning Policy Framework (NPPF). The Draft Plan has been prepared consistent with legislation. As illustrated by the Government's Housing White Paper, changes to legislation and the NPPF are being proposed as part of the Government's planning reforms. Currently, it is not clear what the implications (if any) will be for the Draft Plan.
40. The Council has a statutory duty to engage with local communities and other stakeholders bodies at this stage in the process in accordance with its Statement of Community Involvement.
41. Legislation relating to the local plan preparation process is set out in the Town & Country Planning (Local Planning) (England) (Amendment) Regulations 2012. Prior to submitting a plan to the Secretary of State, in accordance with these the Council must publish for inspection and invite representations on:
 - (i) The proposed submission plan and accompanying proposed changes to the policies map;
 - (ii) Sustainability appraisal report of the proposed plan;
 - (iii) Statement setting out which bodies and persons were invited to make representations on the subject of the plan, how they were invited, a summary of the main issues raised and how those main issues have been addressed (Regulation 18 stage); and
 - (iv) Other accompanying documents relevant to the preparation of the plan.
42. Following the close of the consultation, all representations will need to be considered and summarised. Copies of any representations made together with the summary will need to be submitted to the Secretary of State alongside the above documents for examination. In line with legislative requirements, following the formal consultation, submission will need to first be approved by Council.
43. When examining Plans, Inspectors consider whether the Plan's preparation has complied with the duty to co-operate inserted into the Planning and Compulsory Purchase Act 2004 by Section 110 of the Localism Act 2011, before considering whether the plan is sound and compliant with other legal

requirement. The Council has engaged constructively, actively and on an ongoing basis with the local authorities and prescribed bodies in the Act during the preparation of the Draft Plan as well as through the preparation of the Wiltshire Core Strategy. A statement on how the Council has fulfilled the duty to co-operate to date also needs to be made available as part of the consultation documents and updated following the consultation.

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

Options Considered

45. In preparing the Plan and identifying the proposals, different site options have been considered. The site options considered in each community area and the evidence based justification for the choices made are set out in the evidence papers. These show how the site selection methodology included in **Appendix 3** has been applied to the individual areas of search where allocation is required to ensure the housing levels set in in Core Policy 2 of the Wiltshire Core Strategy can be met over the Plan period.

Conclusion

46. Publication of the Draft Wiltshire Housing Site Allocations Plan for its formal stage of consultation will enable progress to be made on the preparation of the Plan in line with the commitment in the Council's LDS. Submission to the Secretary of State could be achieved around May 2018.
47. At this stage the Council will be publishing what it considers to be a sound document that is based on evidence and targeted consultation.
48. Following consultation, Cabinet should consider the outcome to determine whether changes should be made to the Draft Plan before Council consider approval of the document for submission to the Secretary of State.

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The following unpublished documents have been relied on in the preparation of this Report:

Appendices:

- Appendix 1: Draft Wiltshire Housing Site Allocations Plan
(including Appendix 1 'Proposed changes to policies maps - Settlement Boundaries')
- Appendix 2: Topic Paper 1: Settlement Boundary Review Methodology
- Appendix 3: Topic Paper 2: Site Selection Process Methodology
- Appendix 4: Topic Paper 3: Housing Land Supply
- Appendix 5: Topic Paper 4: Developing Plan Proposals
- Appendix 6: Assessment of Viability (BNP Paribas)

Documents published with the Agenda:

1. Statement of Early Community Engagement
2. Amesbury Community Area Topic Paper
3. Bradford on Avon Community Area Topic Paper
4. Calne Community Area Topic Paper
5. Chippenham Community Area Topic Paper
6. Corsham Community Area Topic Paper
7. Devizes Community Area Topic Paper
8. Malmesbury Community Area Topic Paper
9. Marlborough Community Area Topic Paper
10. Melksham Community Area Topic Paper
11. Mere Community Area Topic Paper
12. Pewsey Community Area Topic Paper
13. Royal Wootton Bassett and Cricklade Community Area Topic Paper
14. Salisbury Community Area Topic Paper
15. Southern Wiltshire Community Area Topic Paper
16. Tidworth Community Area Topic Paper
17. Tisbury Community Area Topic Paper
18. Trowbridge Community Area Topic Paper
19. Warminster Community Area Topic Paper
20. Westbury Community Area Topic Paper
21. Wilton Community Area Topic Paper