



# Wiltshire Housing Site Allocations Plan

Pre-submission  
draft plan

Consultation statement  
- Annex A: Report on the regulation  
18 consultation

June 2017

Wiltshire Local Development Framework

Wiltshire Housing Site Allocations Development Plan Document (DPD)

## **Report on the Regulation 18 Consultation**

### **Final Report**

**January 2016**

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## Chapter 1 Introduction

### Overview of the Wiltshire Housing Site Allocations Plan

- 1.1. The Wiltshire Housing Site Allocations Development Plan Document (DPD), 'the Plan' will, once adopted, provide part of the Development Plan for Wiltshire.
- 1.2. The council declared its intention to prepare the Wiltshire Housing Site Allocations Development Plan Document (DPD), in its Local Development Scheme (LDS) of January 2014. This was subsequently updated in January 2015<sup>1</sup> and continued to include preparation of the Plan in the three year rolling programme.
- 1.3. The scope of the Plan was described in the LDS as a document '*to provide surety of housing delivery for the Wiltshire Core Strategy plan period and will be used to identify sites where there is a potential shortfall in supply on the horizon, or neighbourhood planning is failing to deliver the numbers required to meet local needs. In addition, the document will address the review of settlement boundaries currently outlined in the 'saved' policies of the existing district local plans*'.
- 1.4. As well as identifying housing sites, as indicated in the LDS, the Plan will review settlement boundaries, as defined on the Wiltshire policies maps. Settlement boundaries are drawn for: the Principal Settlements of Salisbury and Trowbridge; Market Towns; Local Service Centres and Large Villages.
- 1.5. The Plan will present proposals and associated policies designed to be in general conformity with the Wiltshire Core Strategy and National Planning Policy Framework. It will consider sites across Wiltshire, excluding Chippenham. Growth in Chippenham is being addressed in a separate DPD.

### Regulation 18 consultation

- 1.6. To ensure plans are prepared on a sound footing, the Council is required to undertake a consultation and seek representations on the proposed scope of the Plan as described in the LDS. This is a requirement under Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012.
- 1.7. In accordance with these regulations the council sought comments on the proposed scope of the Plan and undertook a call for sites exercise as explained below.

### Structure of this document

- 1.8. Chapter 2 lists the various ways by which the council consulted upon the scope of the Plan and undertook a call for sites exercise.

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<sup>1</sup> <http://www.wiltshire.gov.uk/local-development-scheme-doc-jan-15-cabinet.pdf>

- 1.9. Chapter 3 provides a breakdown of the representations.
- 1.10. Chapter 4 summarises the key issues arising from the representations with officer comments.
- 1.11. Chapter 5 lists the proposed changes and sets out the next steps in the preparation of the Plan.
- 1.12. Appendix A provides a list of respondents to the consultation.
- 1.13. Appendix B is the schedule of original comments in full.
- 1.14. Appendix C is the consultation letter and public notice.
- 1.15. Appendix D is a list of all potential SHLAA sites put forward in the call for sites.

## Chapter 2 Consultation methodology

### Consultation methods

2.1. Comments were invited during a six week consultation period between Monday 24<sup>th</sup> March 2014 and Monday 5<sup>th</sup> May 2014. The consultation was planned to meet all of the requirements of Regulation 18 (preparation of a local plan) of the Town and Country Planning (Local Planning) (England) Regulations 2012, which states: “(1) A local planning authority must—

*(a) notify each of the bodies or persons specified in paragraph (2) of the subject of a local plan which the local planning authority propose to prepare, and*

*(b) invite each of them to make representations to the local planning authority about what a local plan with that subject ought to contain.*

*(2) The bodies or persons referred to in paragraph (1) are—*

*(a) such of the specific consultation bodies as the local planning authority consider may have an interest in the subject of the proposed local plan;*

*(b) such of the general consultation bodies as the local planning authority consider appropriate; and*

*(c) such residents or other persons carrying on business in the local planning authority’s area from which the local planning authority consider it appropriate to invite representations.*

*(3) In preparing the local plan, the local planning authority must take into account any representation made to them in response to invitations under paragraph (1).”*

2.2. Consultees were contacted through Wiltshire Council’s Spatial Planning database, which includes those who have submitted comments during previous spatial planning consultations (including on the Wiltshire Core Strategy). It also includes all who have expressed an interest in previous planning documents together with all statutory consultees. Approximately 7000 consultees were contacted by email and 6000 consultees were contacted by post. In addition, public notices were placed in local newspapers across the County.

### Consultation materials

2.3. All consultation documents were available on the Council’s website and respondents were able to respond via email, our online portal or by post. A copy of the letter and public notice that was sent out can be found in Appendix C.

## Chapter 3 Representations

### Overview of representations received

- 3.1. In all, the council received 342 representations during the Regulation 18 consultation on the Wiltshire Site Allocations DPD from 233 different individuals or organisations. A list of all individuals and organisations who responded can be found in Appendix A.

### Breakdown of respondent by type

- 3.2. Figure 3.1 below illustrates the breakdown of respondent by type. It shows that the largest groups of respondents were land owners and developers and individuals. Other representations were received from advisory and local interest groups, town and parish councils, infrastructure organisations and neighbouring authorities.

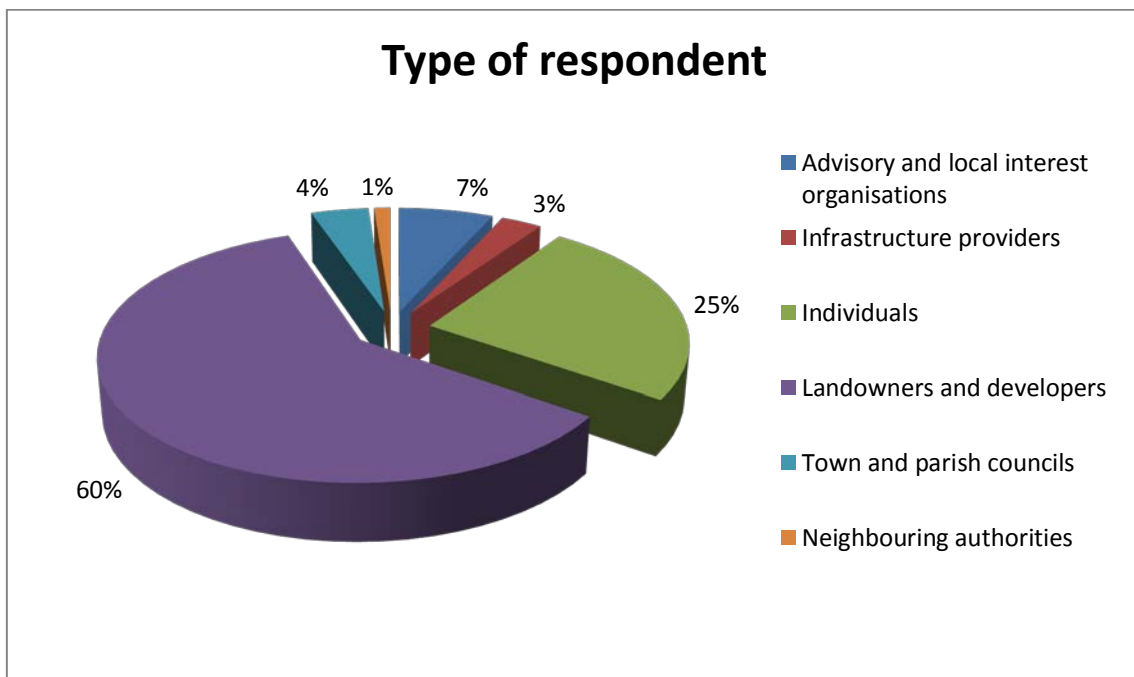


Figure 3.1 - Breakdown of respondents by type

### Breakdown of responses by submission

3.3. Figure 3.2 below illustrates the methods by which the council received representations.

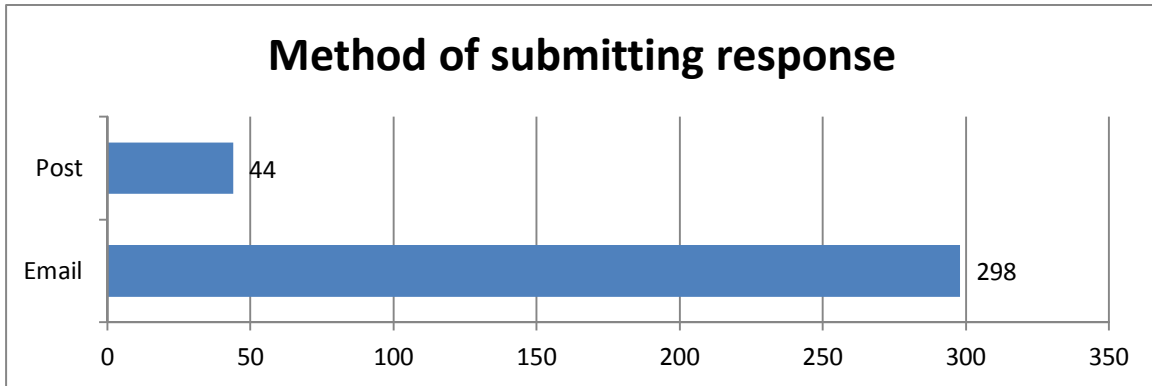


Figure 3.2 - Responses by method of submission



## Chapter 4 Summary of the main issues raised by the representations

- 4.1. Table 4.1 summarises the main issues raised by the representations, with officer comments and proposed changes / actions. All individual representations are available to view in full in Appendix B or through the council's online consultation portal at <http://consult.wiltshire.gov.uk/portal>.

Table 4.1 - Summary of the main issues raised by the consultation

Topic	Issues	Officer response / Proposed action
Infrastructure & Facilities	Ensuring the local facilities and infrastructure keep up with the rate of development to reduce the impact of additional housing on the area and to reduce the need for out commuting.	Noted. The Council will identify the necessary infrastructure requirements of allocated sites in the Plan through its infrastructure planning evidence base. Specific details of infrastructure projects will be identified and progressed through the planning application process.
Traffic & Parking	Concerns were raised about the accessibility of some sites, commenting that highway improvements would be needed to ensure safe access to sites. There were also concerns raised about the increased traffic levels that additional housing would cause and the impact on parking.	Noted. As above but to add that, in addition, site-specific transport assessments would be undertaken as part of the planning application process.
Neighbourhood Plans	There were many queries regarding how the Wiltshire Housing Site Allocations DPD would sit in relation to neighbourhood plans, whether the DPD would take into account neighbourhood	At this stage, in locations where neighbourhood plans are sufficiently advanced and identify housing sites, the council is not proposing to identify further sites. This will serve to support neighbourhood plans already in preparation; and allow

<p>Character of areas</p>	<p>plans and which would take precedence.</p> <p>Many of the respondents were concerned about the impact of additional housing on the character of the area. Comments were made that any additional housing should be in keeping with the character and scale of the area and that housing density should be kept similar to existing housing.</p>	<p>appropriate opportunity for dialogue with communities, who may be considering the preparation of such plans, to articulate their views on how settlements should grow. However, it is recognised that in certain locations (particularly higher order settlements such as Market Towns and Local Service Centres) there may be a need for the council to take a strategic lead, by identifying sites to ensure that sufficient land is made available to maintain supply.</p> <p>Noted. The design and scale of housing must conform to the relevant policies within the Wiltshire Core Strategy. <i>Core Policy 57 iv</i> states, development should make “efficient use of land whilst taking account of the characteristics of the site and the local context to deliver an appropriate development which relates effectively to the immediate setting and to the wider character of the area”. These aspects will be further addressed during the design part of the planning process.</p>
<p>Brownfield or Greenfield sites</p>	<p>The development of brownfield sites over greenfield sites was supported throughout the responses. There was concern over the environmental impact of any development on greenfield sites, both in terms of how it would affect the nature of the area and the impact on wildlife.</p>	<p>Noted. The Wiltshire Housing Sites DPD is to be prepared in general conformity with the WCS. Core Policy 2 states housing ‘will be delivered in a sustainable pattern in a way that prioritises the release of employment land and the re-use of previously developed land ...’ Furthermore, the impact of housing must be assessed in line with the relevant policies in the Wiltshire Core Strategy. <i>Core Policy 51</i> states “Development should protect, conserve and where possible enhance landscape character and must not have a harmful impact upon landscape character, while any negative impacts must be mitigated as far as possible through sensitive design and landscape measures.” <i>Core Policy 50</i> states “Development proposals must demonstrate how they protect features of nature conservation and geological value as part of the design rationale...All development proposals shall incorporate</p>

Settlement Boundaries

Comments were raised about a potential inconsistency between *Core Policy 1, and paragraphs 4.13 and 4.15* relative to the way in which the settlement boundary will be reviewed: *Para 4.13 states:* These settlement boundaries will be reviewed as part of the Wiltshire Housing Site Allocations and Chippenham Site Allocations DPDs, as set out in the Council's Local Development Scheme, in order to ensure they are up to date and can adequately reflect changes which have happened since they were first established. *Para 4.15 states:* "These settlement boundaries will also be reviewed as part of the Housing Site Allocations DPD as set out in the Council's Local Development Scheme, in order to ensure they remain up to date and properly reflect building that has happened since they were first established."

appropriate measures to avoid and reduce disturbance of sensitive wildlife species and habitats throughout the lifetime of the development." These aspects will be further addressed during the planning application process through various surveys and assessments.

The difference appears to be between 'can adequately reflect changes' and 'properly reflect building'. Revised boundaries will reflect the latter, which is the urban form. In terms of the wider definition of 'changes', this will depend upon the consultation feedback and the point raised will be taken into account when developing the methodology.

Settlement Boundaries

Many mentioned that previous policies should be taken into account when reviewing the boundaries, to take into account settlements that the Core Strategy grouped together as Large Villages.

The Wiltshire Housing Sites DPD will be reviewing the original settlement boundaries for the Principal Settlements (excluding Chippenham, which is being addressed through the Chippenham Site Allocation Sites Plan), Market Towns, Local Service Centres and Large Villages. These were identified and

Potential SHLAA sites

Many potential SHLAA sites were put forward in response to the call for sites exercise.

adopted as part of the former district local plans.

Proposed SHLAA sites have been noted, analysed and responded to as appropriate.

## Chapter 5 Potential SHLAA sites put forward in the call for sites

5.1. In total 207 responses were potential SHLAA sites put forward by land owners and developers. Table 5.1 below is a list of the top 12 areas which had potential SHLAA sites put forward in the call for sites exercise. A full list can be found in Appendix D.

Table 5.2 – Top 12 potential SHLAA sites put forward in response to the call for sites.

Area	Number of sites	Area	Number of Sites
Melksham	19	Beanacre	5
Calne	15	Chippenham*	5
Westbury	8	Cricklade	5
Purton	7	Devizes	5
Corsham	6	Sailsbury	5
Alderbury	5	Shrewton	5

\*Chippenham will be dealt with in a separate DPD.

## Chapter 6 Conclusions and next steps

- 6.1. *Table 6.1* contains a list of actions as a result of consultation feedback. Comments focused on the identification of new sites for inclusion in the SHLAA and the process of assessment to be undertaken to identify individual housing sites to be identified in the Plan or to inform the review of settlement boundaries. As a result no change is proposed to the original scope of the Plan, instead comments received will inform the methodology for both the selection of sites to include in the Plan and the review of settlement boundaries.

### Actions

#### Actions

1. The Council will identify the necessary infrastructure requirements of allocated sites in the DPD. Specific infrastructure projects will be identified and progressed through the planning application process.
2. Site-specific transport assessments will be undertaken as part of the planning application process.
3. The Council will ensure that any applications comply with the relevant policies within the Wiltshire Core Strategy.
4. Officers will review all consultation feedback and consider how they should inform the methodology for the assessment of sites and review of settlement boundaries.
5. Sites identified through the consultation will be appraised as part of the site assessment methodology developed for the Wiltshire Housing Site Allocations DPD

Figure 6.1 Proposed actions as a result of feedback

### Next steps

- 6.2. This report presents a summary of the feedback from the Regulation 18 consultation on the Plan.
- 6.3. The next steps in the preparation of the Plan will be, firstly, to assess sites submitted during this consultation and through the Strategic Housing Land Availability Assessment (SHLAA). The aim is to identify additional housing sites across Wiltshire to take forward as potential allocations. Secondly, to prepare draft revised settlement boundaries. The outputs from both processes will then be subject to further consultations.

## Appendix A: List of respondents

Name	Consultee ID	Organisation (where applicable)	Comment ID
Mr Malcolm Watt	198565	Cotswold Conservation Board	<a href="#">30</a>
Mr Charles Routh	382216	Natural England	<a href="#">38</a> , <a href="#">50</a>
Dr Richard Pagett	389605		<a href="#">244</a>
Mr Keith Harvey	389714	Westbury Town Council	<a href="#">345</a>
Ms A Burchell	390222		<a href="#">36</a>
Mrs A Roe	390287	Lydiard Tregoz Parish Council	<a href="#">44</a>
Ms C Sealy	390389	Country Landowners Association	<a href="#">312</a> , <a href="#">313</a> , <a href="#">314</a> , <a href="#">315</a> , <a href="#">316</a>
Mr D Ogborne	390498	Wessex Water	<a href="#">68</a>
Mr Chris Rolfe	390659	Wilton Estate Office	<a href="#">347</a>
Mr P Gantlett	390699	Clyffe Pypard Parish Council	<a href="#">10</a>
Ms Lucy Cliffe	390747	Fisher German LLP	<a href="#">46</a>
Mr Graham Singer	391165	Graham Singer	<a href="#">11</a> , <a href="#">12</a> , <a href="#">22</a> , <a href="#">23</a> , <a href="#">24</a> , <a href="#">25</a> , <a href="#">34</a>
Mrs Joanna Atkinson	391542	Fisher German Chartered Surveyors LLP	<a href="#">343</a>
Mr R P Coleman	391586	Dilton Marsh Parish Council	<a href="#">35</a>
Mrs S Harry	391632	Tisbury Parish Council	<a href="#">85</a>
Mr M Buckland	391751		<a href="#">304</a>
Mr T Daw	391786		<a href="#">75</a>
Mrs J Tier	391900	Winterslow Parish Council	<a href="#">150</a>
Mr Peter Bayley	392002		<a href="#">17</a> , <a href="#">76</a>

MMA Mortimer	392003	M M A Morimer & Son	<a href="#">31</a>
Mr Desmond Dunlop	392036	Barratt Homes	<a href="#">111</a>
Mr Cornwell	392369	The Bell Cornwell Partnership	<a href="#">213</a>
Mr Burden	392646	Cranborne Chase & West Wiltshire Down AONB	<a href="#">70</a>
Mr Desmond Dunlop	392725	Crest Strategic Projects Limited & Redcliffe	<a href="#">132</a>
Mr Simon Hart	393520	Lovell Stone Group	<a href="#">14</a>
Mr Royston Thomas	394285		<a href="#">18</a>
Mrs Sue Lawton	394814		<a href="#">193</a>
Mr T Molloy	394945		<a href="#">55</a>
Mr & Mrs G.J & M.E Hobbs	394961		<a href="#">309</a>
Ms J Gough	394994		<a href="#">26</a>
Mrs S J Richards	395098		<a href="#">7</a>
Mr F Rumble	395110	Friends of Abberd Brook	<a href="#">1</a>
Miss Katherine Burt	395940	Environment Agency (Wessex Area)	<a href="#">88</a>
Mr D Kilmister	395968	Langley Burrell Without Parish Council	<a href="#">136</a>
Mr Brian Clifford	195993	Network Rail	<a href="#">19</a>
Slater Reynolds	396105		<a href="#">13</a>
Mr Andrew Ross	397786	Taylor Wimpey UK Ltd	<a href="#">91</a>
Mr Andrew Hattersley	397800	Society of Merchant Venturers	<a href="#">16, 341, 348</a>
Mr Andrew Hungerford	399807		<a href="#">9</a>
Lorraine McRandle	404445	Melksham Town Council	<a href="#">33</a>
Giles Brockbank	404631	Colerne Industrial Estate	<a href="#">209</a>
D.C.M Robinson, Esq. &	405996		<a href="#">2</a>



Lady L. Robinson			
Mrs P Daniel	446038		<a href="#">20</a>
Mr & Mrs J Amos	446046		<a href="#">41</a>
Mr A Hill	446592		<a href="#">311</a>
Mr T Elliott	446593		<a href="#">42</a>
Mr D Rusholme	446598		<a href="#">43</a>
Mr Poole	447415		<a href="#">21</a>
Mr M West	448530		<a href="#">3</a>
Mr James Millard	449064	Pegasus Group	<a href="#">221</a> , <a href="#">339</a>
Mr J Woolley	449224	Woolley and Wallis	<a href="#">151</a>
Mr D Barnes	449236	Star Planning and Development	<a href="#">110</a>
Mr P Atfield	449269	Goadsby Planning and Environment	<a href="#">45</a> , <a href="#">49</a> , <a href="#">330</a> , <a href="#">334</a>
Mr B C Woodcock	449495	B C W Developments	<a href="#">346</a>
Mrs M.H Trounson	457348		<a href="#">98</a>
Mr Tim Baker	458945		<a href="#">47</a>
Mrs Janet Amos	467567	West Tisbury Parish Council	<a href="#">40</a>
Mrs J Turner	470100		<a href="#">322</a>
Mr Michael Summers	470381		<a href="#">317</a>
Mr Andrew Lord	472647	North Wessex Downs AONB	<a href="#">29</a>
Mr and Mrs David and Greta Margetts	473133		<a href="#">37</a> , <a href="#">318</a>
Mr John Baumber	473205		<a href="#">4</a>
Mr Ian Scaife	473545		<a href="#">240</a>
C V & L Morley	477217		<a href="#">320</a>
Mrs Alyson Garland	477721		<a href="#">143</a>

Ms Jenny Joyce	477725		<a href="#">303</a>
Mr Alan Whear	477726		<a href="#">301</a>
Mr Neil Truckell	478940		<a href="#">310</a>
Mr David Sandberg	479312		<a href="#">54</a>
Mr Duncan Young	480526		<a href="#">327</a>
Mr Anthony Whinney	481039		<a href="#">263</a>
Mrs Elise Baird	481076		<a href="#">177</a>
Janet Robbins	481569		<a href="#">69</a>
Barbara Morgan	488946	Network Rail	<a href="#">71</a>
Mrs Karen Howard	507700		<a href="#">260</a>
Mr Owen Inskip	544808	Chippenham 2020 LLP	<a href="#">32</a>
G R Elliott	547987		<a href="#">138</a>
Mr G Gardiner	548256		<a href="#">28</a> , <a href="#">195</a>
Mr Michael Orr	549006	CSJ Planning Consultants Ltd	<a href="#">288</a>
Mr Stephen Siddall	549248	Holt Parish Council	<a href="#">176</a>
Mr David Fovargue	549444	The Crown Estate	<a href="#">178</a> , <a href="#">179</a> , <a href="#">180</a> , <a href="#">181</a> , <a href="#">182</a> , <a href="#">183</a>
Nigel Dexter	550594	Savills	<a href="#">67</a>
John Baker	556321	Peter Brett Associates	<a href="#">191</a> , <a href="#">324</a>
Mr Daniel Washington	556368	GL Hearn Limited	<a href="#">157</a>
Robert Niblett	556401	Gloucestershire County Council	<a href="#">66</a>
Mr Duncan Hartley	556420	Rural Solutions Consulting Ltd	<a href="#">344</a>
Mr Jeremy Woolf	556491	Woolfe Bond Planning	<a href="#">155</a> , <a href="#">156</a>
Marion Barton	558192	Shrewton Parish Council	<a href="#">144</a>
Mr Simon Chambers	635979		<a href="#">292</a> , <a href="#">293</a> , <a href="#">294</a> , <a href="#">295</a> , <a href="#">296</a> , <a href="#">297</a> , <a href="#">298</a> , <a href="#">299</a>

Mr Gerald Harford	639580	Chesterton Humberts	<a href="#">133</a>
Mr Nick Mathews	644496	Savills	<a href="#">87</a>
Mr John Owen	647559	Green Square Group Ltd	<a href="#">187</a> , <a href="#">190</a> , <a href="#">255</a> , <a href="#">256</a> , <a href="#">257</a> , <a href="#">242</a> , <a href="#">238</a> , <a href="#">249</a> , <a href="#">250</a> , <a href="#">251</a> , <a href="#">252</a>
Mr Charles Leather	701699		<a href="#">109</a> , <a href="#">113</a> , <a href="#">114</a> , <a href="#">116</a> , <a href="#">118</a> , <a href="#">122</a> , <a href="#">168</a> , <a href="#">169</a> , <a href="#">170</a>
Mr David Parsons	705222		<a href="#">321</a>
Mr Guy Hemsley	712868	Esso Petroleum Ltd	<a href="#">15</a>
Ms Fiona Brereton	738177	Bovis Homes Ltd South West Region	<a href="#">188</a>
Mr Chris Beaver	752571	Planning Sphere Limited	<a href="#">131</a>
Miss Claire Hambleton	756575	Persimmon Homes	<a href="#">236</a> , <a href="#">237</a>
Ms Nicole Penfold	758255	Gladman Developments	<a href="#">225</a>
Ms Sandra Bartlett	783430	Bradford On Avon Town Council	<a href="#">48</a>
Mr Chris Coyle	798099	Wilts & Berks Canal Trust	<a href="#">272</a> , <a href="#">273</a> , <a href="#">275</a> , <a href="#">276</a> , <a href="#">277</a> , <a href="#">278</a> , <a href="#">279</a> , <a href="#">281</a> , <a href="#">282</a> , <a href="#">283</a>
Sarah Purvey	816728		<a href="#">90</a>
Mrs Anna Southern	820831	Salisbury City Council	<a href="#">86</a>
Mr Ed Halford	824178	Highways Agency	<a href="#">291</a>
Tara Maizonnier	824512	Amita Management Ltd	<a href="#">224</a>
Andrew Purvey	827702		<a href="#">89</a>
Mr Dave Clements	827869		<a href="#">39</a>
Helen Clements	827872		<a href="#">128</a>
Andrew and Mary Emmerson	827877		<a href="#">121</a>
Mark Saint	827889		<a href="#">146</a>
Martin and Angie Cleverly	827891		<a href="#">305</a> , <a href="#">306</a>

Cllr Mike Whelan	828249		<a href="#">5</a>
Mrs Jeremy Flawn	828250	Associate	<a href="#">6</a>
Mr Alan Gibson	828472		<a href="#">8</a>
Ms Idris Kirby	833825		<a href="#">27</a>
Mrs M Frances	833976		<a href="#">51</a>
Mr Martin Houghton	833978	Houghton Telecom Services Limited	<a href="#">52</a>
Ms Jo Freyther	833980		<a href="#">53</a>
Mr Conor Lee	834142		<a href="#">56, 57, 58, 59, 60, 61, 62, 63</a>
Mr David Glasson	834156	Glasson Planning	<a href="#">64</a>
Mr and Mrs Terry and Anne Tottingham	834163		<a href="#">65</a>
Chrystle Garnier	834818	Highways Agency	<a href="#">72</a>
Mr R M Wilde	834861		<a href="#">73</a>
Lucy Dawson	734863		<a href="#">74</a>
Bernie Crew	834879		<a href="#">77</a>
Christopher Jowett	834925		<a href="#">78, 79, 80, 81, 82</a>
Rob Duff	834944	Earlsfield	<a href="#">83</a>
S K Brown	834964		<a href="#">84</a>
Ms Claire Hambleton	834975	Persimmon Homes Wessex	<a href="#">92, 93, 94, 95, 96, 97, 100, 102, 103, 105, 106, 107, 108</a>
Miss Henny Collins	835303	GolDev Ltd	<a href="#">99, 338</a>
Mary Blanchard	835307		<a href="#">101, 104</a>
Mr Michael Gray	835348		<a href="#">112</a>
Ms A De La Mare	835379		<a href="#">115, 119</a>
Mr Michael Bull	835390		<a href="#">117</a>
Kate Taylor	835396		<a href="#">120</a>

Mr Jeff Lee	835403		<a href="#">123</a>
Mr Robin Collyer	835406		<a href="#">125</a>
Nathan McLoughlin	835407		<a href="#">124</a> , <a href="#">129</a>
Mr Shane O’Neill	835408		<a href="#">126</a>
Ms Sarah Collyer	835412		<a href="#">127</a>
Ms Yvonne Savage	835412		<a href="#">130</a>
Mary Hodge	835418		<a href="#">134</a>
Ms Sally Walters	835420		<a href="#">135</a>
Taylor Wimpey	835422		<a href="#">137</a>
Mr Graham Harris	835435		<a href="#">139</a>
Mr Chris Walkes – Ciudad	835439		<a href="#">140</a>
Ms Janet Higham	835450		<a href="#">141</a>
Mr Alan Higham	835452		<a href="#">142</a>
Mrs Nicky Saint	835456		<a href="#">145</a>
Ms Elizabeth Hart	835467		<a href="#">147</a>
Mr Keith Bradshaw	835493		<a href="#">148</a>
Ms Jane Kennedy	835494		<a href="#">149</a>
Mr Jason Lewis	835496	Smiths Gore	<a href="#">152</a>
Mr Christopher Wickham	835502	Christopher Wickham Associates	<a href="#">153</a> , <a href="#">189</a>
Miss Deborah Smart	835509		<a href="#">154</a>
Mr K Bowley	835906		<a href="#">158</a>
Janet Montgomery	835915	Brimble Lee and Partners	<a href="#">185</a> , <a href="#">186</a>
Mr George Smith	835920		<a href="#">159</a> , <a href="#">160</a> , <a href="#">161</a> , <a href="#">162</a> , <a href="#">163</a>
Paddy O’Keeffe	835927		<a href="#">167</a>
Mr Bryan Barnett	835943		<a href="#">164</a>
Ian Taylor	835954		<a href="#">174</a> , <a href="#">165</a> , <a href="#">172</a>

Mr Bob Nicholas	835957		<a href="#">166</a>
B Wells	836022		<a href="#">171</a>
	836038	Waddeton Park Limited	<a href="#">173</a>
Mr and Mrs Ray and Ann Gilbert	836054		<a href="#">175</a>
Mr James Wood	836091		<a href="#">184</a>
Mr Chris Dance	836105	LPC (Trull) Ltd	<a href="#">203</a>
Mr Stephen Jeary	836126		<a href="#">192</a>
Rev'd Peter M Brant	836155		<a href="#">194</a>
Jenny Henderson	836254		<a href="#">196, 201</a>
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Mr Paul Newman

837789

Qdos Homes Ltd

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## Appendix B: Schedule of comments

Comment ID	Settlement referred to / site location	Comment
1	Calne	I live in Calne which is not mentioned on your DPD and as such I do not understand why I have been sent the original email. I understand there are numerous areas already identified within the SN11 post code area for development plus areas for which various people are seeking planning permission outside of those already agreed. As Calne is classified as a Market Town and already has a population of some 23,000 with not enough infrastructure and facilities to support this number then any further development will surely result in a) the loss of the Market Town status and b) result in the area being classed as a place where no one wishes to live.
2	Neston	Re: Affordable Housing for the village of Neston, near Corsham. Thank you for your e-mail. When do you think planning permission will be allowed in the village of Neston? Knowing there is an outcry for a development there with the need of affordable housing. Any information on this most useful to know..
3	Amesbury	As suggested in the emailed document sent to me, I would like to make some suggestions/observations. Amesbury will become a focal point for the returning Army units that are to be housed in the surrounding area and as such, requires more infrastructure to accommodate these increases. Traffic congestion can only get worse at the Countess Road intersection with the A303. Priority must be given to dualling the A303 and building a flyover at this junction. The wasted money spent on such study projects over the last twenty years could have done the job many times over. The 'new' Countess roundabout is an eyesore and badly needs regular maintenance to show that Wiltshire really does care. The A345 from Amesbury to Salisbury will attract more vehicles, which is too small for present traffic and urgently needs widening plus a pavement and/or cycle track. As further commercial development takes place at Solstice park, more heavy goods vehicles will be using these two roads. Visitors to Stonehenge must think that access from Salisbury via Amesbury during the summer months is 'some kind of quaint detour' - with long traffic queues to reach the site being as bad - if not worse - than before. Finally, more people mean

more buses. Both Salisbury and Amesbury need bus stations. It beggars belief that an English 'attraction' city - Salisbury - has no dedicated central bus station. Already, traffic problems are being seen on the A345 in Amesbury due to insufficient space for two or more buses in the new laybys provided. The original bus station - now converted to a pay car park - is hardly used. (Free parking 50 metres away at the Co-op store?!).

- 4            Devizes            With regards to the Core Strategy, is this seeking sites within the designated areas identified in the Core Strategy as actual sites to achieve the numbers for each area? If so, for Devizes for instance the required housing numbers to 2026 already have identified sites which are detailed in the Draft Neighbourhood plan. This is particularly important with respect to the appeal for the Coates Road Development which quite logically and rationally has been turned down by Wiltshire Council.
- 5            General                When considering building, please don't forget off road parking for at least 3 cars, 2 for the House and 1 for Visitors and wider Roads. No parking on the footpath's.
- 6            West Lavington        We are currently advising West Lavington Parish on their Neighbourhood Plan and I want to understand how the new site allocations document will sit in relation to emerging NPs. 1 Will NPs no longer be needed in, eg, West Lavington? 2 Will Wiltshire Council purposely exclude West Lavington / Littleton Panell from the site allocations identification / settlement boundary review processes? 3 What happens if the NP stops and the answer to 2 above is yes ? Will there be a series of reserve sites identified in locations where parishes are progressing NPs and if so, will parishes like West Lavington / Littleton Panell find themselves suddenly having sites imposed on them at a late stage in the site allocations process? 4 How would any review of the settlement boundary / identification of potential allocation sites and associated sustainability appraisals of such sites carried out in West Lavington feed into / be influenced by the Wiltshire Site Allocations DPD? 5 Should the parish be encouraged to identify sites in the call for sites? This process is essentially going to run in parallel with their own process of identifying and appraising sites and I can see opportunities for conflict arising. I am sure there will be other questions but I wanted to try and understand the mechanics of this new process and see how it impacts upon the NP before advising my clients.
- 7            RWB / Swindon        In reply to your letter ref:WCHSA/395098, I do not own any land suitable for development but I would like to suggest the council look at the undeveloped land at Ballard's Ash for future development. With direct access to the B4042 and far enough away from Junction 16 to keep a gap between Royal Wootton Bassett and Swindon this land could be ideal for development.

- 8            General            a) Whatever is proposed will never satisfy or keep up with human population growth. b) 'Brownfield' land must be utilised first despite developer's objections.
- 9            General            Keep to basics like flood defences and areas not at risk of flooding. Then road volumes and access to shops, schools and doctors/dentists. Then there is leisure to keep communities healthy and peaceful. Everyone accepts need of more houses but not like Bradley Stoke in Bristol that built 10,000 houses before building facilities. You've done a good job in Melksham with that new road and ditches. Also paths are great for exercise and getting people out to let off steam.
- 10           Clyffe Pypard       Clyffe Pypard Parish Council is currently conducting a community plan to establish the future wishes and requirements of the community. It is also part of the NEWV neighbourhood plan. We are aware of some potential sites that may be put forward for possible housing developments. Should we, as part of your consultation, invite residents to submit their potential sites to you?
- 11           Allington            I act for Mr. G. Shiles, Manor Farm, Allington, Chippenham, who is the sole owner of land shaded mauve on the attached plans being (a) 32 ha (80 acres) north west of the A350 and (b) 39 ha (96 acres) land south of Pewsham Way - No. 8 on plan. I attended the meeting with the planning team and others to consider the proposed 'Range' application to be sited on Shiles land adjacent to the A350. I noted enthusiasm for the application and the employment opportunities it presents. Referring to the multi-coloured plan, a link road from Pewsham Way to the (allocated) residential site at Milbourne Farm (No. 4) would involve a short stretch of new road. This would facilitate free movement of traffic from Pewsham, Calne, Marlborough and Devizes to the A350 without congesting the Bridge Centre and the Bristol Road area of central Chippenham and offer quick access to The Range. To fund the cost of this link road additional allocation of housing numbers would be required on Council land and Shiles land in south Chippenham. I submit that this proposal is readily deliverable and more affordable, sensible and preferable to the circuitous project to the East.
- 12           Lyneham            I act for Messrs. D & T Webb, Pound Farm, Lyneham, Chippenham. I attach plan of some 20.23 ha (50 acres) which is available for residential development to accommodate the recently approved Military training centre in Lyneham. The site is in the sole ownership of the Webb family and is being promoted by Gleeson Strategic Land Ltd.
- 13           Market            I refer to your email dated 20/03/04. When the Kennet District Plan was in course of preparation I made proposals to amend Lavington            that policy and on the majority of my amendments, related to minor changes to ANOB boundaries, the inspector found against me but allowed a housing proposal behind 41 The Spring being the conversion of a small set of buildings. The land which is the

subject of this submission relates to a parcel fronting The Spring, B3098, next to the recent housing development nearly at the mini roundabout giving access to the Park Farm Estate and lying between the highway and a drainage stream running from Broadwell, White Street, Market Lavington. The land to the East was scheduled for commercial redevelopment from a garage but in the end went for housing. The subject paddock, being pretty well within the centre of the village has, as you will readily understand, certain alternative uses: A strip might be used to provide access to land lying to the South which might be thought appropriate probably for residential use; the balance say, for a suitable retail scheme. Residential linking with the existing frontage housing to East & West. A retail/ light industry/office scheme with a low cost housing/flat component. My parents lived in Market Lavington for over 40 years and they saw great changes with a disappearance of so many retailers while the population rose from 900 to 2300. Now the community is recovering from the commercial damage inflicted by the War Department (as it then was) purchases in the 19th & 20th C.s. This large village should never be thought to be more than a compliment for Devizes yet it does serve and attract, as you know, a wide local population stretching under The Plain from perhaps Bratton to Marden. Our traders have, at the moment a solid local village base. As town retailers seek greater market share, so our village businesses either need better locations or a bigger residential population. Maybe I ought to say that I am aware of the retail proposal, now shelved, at West Lavington cross roads. Market Lavington is a secondary growth point and certainly deserves to succeed. Please advise if you need me to send a location plan; my scanning efforts are hopeless.

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| 14 | General  | The only comments I have to make regarding the scope of the two new plans is the supply of local building stone, and where possible the use of local building stone should be used to fit in with the local vernacular of the area. Also sustainability of building materials should be looked at, with local stone being top of the list.  |
| 15 | General  | Esso have two pipelines which run through Wiltshire and obviously, they would expect Fisher German as their agents to be consulted on any proposed scopes if they affect either of their pipelines. You can use the website <a href="http://www.linesearchbeforeudig.uk">www.linesearchbeforeudig.uk</a> to determine if this will be the case.   |
| 16 | Devizes  | Smiths Gore on behalf of the Society of Merchant Venturers submit the attached Call for Site forms and Site Location Plans at the following sites: Quakers Walk SHLAA forms provided.   |
| 17 | Melksham | I have looked at the list of sites put forward for future development in Melksham on the website and noticed that the land that I co- own with other members of my family, namely site 715 Woodrow House Farm is listed as 'not available at present as in multiple or unknown ownership' we put the land forward for consideration some years ago and it is available and I can give you |

details of all the owners if needed. Please can you amend the details of this site to reflect the true status and I let me know when this has been done. Below is the address I found it on. [www.wiltshire.gov.uk/planning-shlaa-2011-dec-appendix-3-melksham.pdf](http://www.wiltshire.gov.uk/planning-shlaa-2011-dec-appendix-3-melksham.pdf) - 22 December 2011

- 18      Urchfont      I confirm that I am the owner of the site identified as SHLAA site 523 known as Peppercombe in Peppercombe Lane, Urchfont. I confirm that I am actively seeking to develop this site within the next year or so, subject to obtaining PP. The 0.7Ha site is on the edge of Urchfont and I have already had useful discussions with the Urchfont Neighbourhood Plan committee regarding development here. I envisage a small development of no more than 5 open market houses, the existing bungalow being demolished, giving a net gain of 4 dwellings on the site. I consider anymore dwellings would crowd the small site and would probably be unacceptable to the local community both in terms of impact and increase in traffic. I and my family plan to live in one of the new houses. I would like to make a few suggestions on the proposed revision of the SHLAA: The previous version was not easy to search so the new version does need to be easily searchable. Organise the listings into towns and villages in alphabetical order. I look forward to hearing further from you in due course.
- 19      General      Referring to your letter of the 20th March, 2014 regarding Wiltshire Housing Site Allocations DPD and Chippenham Site Allocations DPD. I have looked through the council documents and can find no reference to mineral extraction or landfill operations on which it is our department's role to assess and comment. Therefore, we have no recommendations or comments thereon.
- 20      Salisbury      Housing in the Salisbury Area with 5 rivers and 1 main exit bridge from the City, Salisbury cannot sustain any more building on open land. However, with more and more public shopping on the internet and shops closing, there is an opportunity to use these for housing, as they become empty. Like brown sites wherever possible. Please consider this.
- 21      Alderbury      Thank you for your letter of 20th instant. I wish the last of my building land in Wiltshire at Canal Lane Alderbury as notified in 2008 to be included in the proposed new plan. It proposed to develop in about 2018/9.
- 22      Sherston      I act for Messrs T & P Moody, Upper Stanbridge Farm, Sherston. I attach plan with red and blue edged land owned by my clients. The Wiltshire Council have contractual provision to re-purchase the land edged red at agricultural value on production of a planning consent. The area edged red is eminently suitable for a number of village facilities including possible extension of the school, additional car parking, doctors surgery and allotments. The land edged blue is suitable for over 55s bungalows,

market and affordable housing. The total area is 8 acres.

- 23 Malmesbury I act for the owners of the site identified on the attached plan in School Lane, Lea, Near Malmesbury. My clients would like to promote this village site for residential development.
- 24 Purton I act for the owners of the site identified on the attached plan west of Reids Piece, Purton. My clients would like to promote this village site for residential development.
- 25 Quemerford I act for Mr. A Whinney of Quemerford Farm, Calne - please see attached plan. This site is well contained, deliverable and suitable for residential development.
- 26 Calne I recently received a letter regarding the above, Wiltshire Housing Site Allocations DPD, and have had a chance to look at the areas which would affect my community - Calne. The amount of housing proposed for Calne seems extraordinary when there doesn't seem to be any plans being made to enhance the infrastructure of the town. More and more housing estates are being built with limited shopping facilities, schools, leisure facilities - including restaurants, a council run sports centre, and a police station which is manned and open during the day. I am also extremely concerned about a number of the areas being targeted and the roads leading to these and how the people living in the surrounding areas will be affected by the significant increase in traffic and the road widening which will have to take place. I am all for Calne moving with the times and becoming a vibrant market town but if nothing is done to improve the infrastructure and all that happens is housing, housing, housing. Calne will become nothing more than a large housing estate itself!
- 27 Tisbury I write to object to two sites near my dwelling that are being considered for development. They are site 3171 and site S59. Both sites exit on a very narrow country lane with very poor visibility. Site 3171 is used extensively by the general public. There is a public footpath across the top end and a permissive path from south to north that the school children use to walk to school. The field is used for recreation " Kite flying, sledging in winter. It is also a wildlife haven for birds, horses and badgers. It is also on a steep slope and not at all suitable for building. The next field north is owned by the Parish. The site is currently let and the tenant maintains it. Previously the owner let the site to nature. Please come out to Tisbury and see the site and see what damage development would do.
- 28 General I have the following comment to make in representation on the Wiltshire Housing Site Allocations DPD. Action on the Wiltshire Housing Site Allocations DPD should be deferred until there is evidence of inward investment into Chippenham by

business/commercial/entertainment entities. The town has long since outgrown its capability to sustain its local population and/or offer an attractive quality of life. No meaningful policy or planning can be undertaken until such investment is in place.

- 29            General            The North Wessex Downs AONB Unit wish to respond to the Wiltshire Housing Site Allocations DPD scoping consultation: The Council has a legal duty to consider the conservation and enhancement of the AONB under Section 85 of the CRoW Act 2000 and they are a partner in the production of its Management Plan. In the production of a Site Allocations DPD due consideration should be given to the purposes of conserving and enhancing the AONB and specific reference should be made to its Management Plan and the attached Approved Housing Position Statement and Approved Setting Position Statement. The North Wessex Downs AONB Unit made detailed submissions to the Core Strategy Hearings as to the correct approach to housing provision within the Wiltshire AONBs (44% of Wiltshire is within an AONB). We attach again copies of our Hearings Submissions from 2013 on Matter.1. and Matter.4. and in relation to the proposed delivery of housing to the Marlborough and Pewsey Areas to highlight our previous objections. Further to this specific changes to the Core Strategy (tracked changes version November 2013) were secured following the Hearings in specific relation to the approach to the AONBs. These include the changes from supporting paragraphs 6.73 onward and in specific relation to CP51 Landscape. We therefore request that these changes are also taken into consideration before undertaking the Site Allocations DPD work. Additional text was also added at 6.74 of the Core Strategy for the provision of a Landscape Strategy for Wiltshire in early 2015. We recommend that a Landscape Strategy should be undertaken before or in conjunction with the Site Allocations DPD, to help guide development and settlement boundaries in specific reference to the AONBs and sites outside but within the setting of the AONBs. We would be happy to meet with Officers again to discuss our comments.
- 30            General            The Cotswolds Conservation Board supports and endorses this response from the North Wessex Downs AONB unit with respect to that part of Wiltshire within the Cotswolds AONB. Reference should be made in the DPD to the Cotswolds AONB Management Plan 2013-18 and associated Position Statements. These documents are available on the Boards website at: <http://www.cotswoldsaonb.org.uk/?page=managementplan> <http://www.cotswoldsaonb.org.uk/?page=positionstatements>
- 31            Melksham            Following your letter dated 20th March 2014 ref:WCHSA/392003 - Notification of Intention to Prepare Two New Development Plan Documents. Having looked at the on-line form it states not to complete for sites which have previously been submitted to previous or current authority. Please however note interest of our land at Northbrook Road (Dunch Lane, Melksham) as part of the DPD.



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General

I write partly as a follow up to our telephone conversation on the 21st March and partly as a submission to the current consultation relating to the Notification of Intention to Prepare Two Development Plan Documents. The consultation invites comments to ensure the DPDs are as informed as possible from the outset of the preparation process. The notice states that the primary role of the Housing Allocations DPD is to support the delivery of housing growth set out within the emerging Wiltshire CS and the Chippenham Site Allocations DPD will ensure that specific development sites are allocated at Chippenham to fulfil the growth planned for the town over the period to 2026. There are a number of recent documents which are relevant to the above: Methodology for Disaggregation of Increased Housing Requirement to Community Area and Housing Market Area Level (January 2014), “ this says the starting point is a pro rata distribution but it goes on to say in Para 2.8 that: Past rates of housing (over the period 2006-2013) in each settlement and community area are compared to the rate implied by the proposed scale of development. The proposed level of new homes is considered unrealistic if the implied rate of house building for the remainder of the plan period is being expected to more than double what has been achieved in recent years in some areas there may have been under delivery for a variety of reasons and past rates may not be a true reflection of what the private sector might otherwise deliver, but more than doubling rates is the upper limit for what is considered a reasonable ceiling for a realistic upturn. Topic Paper 15 addendum, “Housing Requirement Technical Paper (28th February 2014). Para 4.10 repeats the words of para 2.8 above verbatim. This seems to suggest that if a town such as Chippenham has under delivered in the past it will not be allowed or able to deliver in the future and this is clearly illogical and contrary to the spirit of the NPPF which encourages a positive attitude to growth. In particular para 52 states: The supply of new homes can sometimes be best achieved through planning for larger scale development, such as new settlements or extensions to existing villages and towns that follow the principles of Garden Cities. Working with the support of local communities, local planning authorities should consider whether such opportunities provide the best way of achieving sustainable development. What is strange is that this illogical constraint, outlined above, is at odds with: SA Addendum (28th February 2014) which states in para 3.6.3 as follows: The scale of housing requirements in Core Policy 10 is expressed as a minimum to reflect the further work needed to achieve a pattern of development that can best realise the towns economic potential. The Chippenham Sites Allocation DPD will support the area strategy; it will focus on identifying land for mixed use development adjoining the built up area. Limited land opportunities have inhibited development in the past, and this needs to be addressed urgently, but growth also needs to be underpinned by investment in new infrastructure. It is considered that Chippenham will benefit from a more detailed framework that coordinates growth and key infrastructure necessary to deliver a more resilient long term future. Para 3.6.4 goes on to say that: Unlike other areas, Chippenham Town housing requirements are retained as a minimum. I applaud the suggestion in this SA Addendum that Chippenham should grow to realise its economic potential (which is huge!) but am

concerned that the Methodology Statement and the Topic Paper 15 Addendum, referred to above, may serve to severely curtail its growth potential as a direct consequence of its recent under delivery. I consider the limitation in constraining housing delivery to a formula based on past rates of housing completions to be unsound with reference to NPPF 182. I am further concerned to hear comments from senior Councillors and Officers that the Inspector has suggested curtailing Chippenham's potential in favour of Trowbridge on the grounds of past delivery records. Unless I am missing something I can find nothing to corroborate this, "indeed in his letter of the 4th February he anticipates the likely need for some flexibility in how sites are identified. He goes on to say that disaggregation should not be so prescriptive as to be inflexible and potentially ineffective in delivering the identified level of housing etc. and I am interested in a proportionate level of evidence that supports the Plans intentions and I am ever mindful of the content of the NPPF etc. I do concede that, due to the size and complexity of the Chippenham sites, there may be a limit on what can be delivered in Chippenham during the first 5 years of the plan. Should there be any shortfall, this can be addressed in other parts of Wiltshire and will, in any event, be well caught up in Chippenham during the rest of the plan period and beyond. Also I imagine that the plan will include a procedure to monitor ongoing delivery and make necessary changes in the event of under delivery. The main point of this letter is to ask for your comments and thoughts on the apparent contradiction outlined above and to log these concerns as a formal submission to the current consultation. However whilst writing I would like to take the opportunity to raise one or two further issues that are of concern: The Modified Version of the Chippenham Area Strategy (March 2014) contains, between paras 5.52 and 5.53, a map of Chippenham with the old strategic sites "surely this is incorrect? Also in relation to CIL (and there will be relevance here in comparing one site against another in terms of viability and deliverability): The Wilts CIL Draft Charging Schedule (Jan 2014) makes specific reference in the plan on page 5 to the old strategic sites in Chip. This is wrong since the sites are now unallocated. The Wilts CIL Draft Regulation 123 List (Jan 2014) contains a table on page 1 which includes for Chippenham: the provision, improvement, replacement, operation or maintenance of infrastructure items required to ensure the successful implementation of the Chippenham Masterplan with a \* denoting, Note: the master plans are in an early stage of development and specific infrastructure requirements have not yet been identified. Any infrastructure items arising from the master plans will be added to the draft Regulation 123 List when they are known and the details of them will be added to the Infrastructure Delivery Plan. It would therefore appear that WCs recent CIL consultation referred to a document that included the old and currently unallocated sites in Chippenham, and a Masterplan that is incomplete and not yet agreed. The Wilts CIL Infrastructure Delivery Plan 2 - 2011/16 "App 1 (Sept 2013) makes reference to the strategic sites including of old Chippenham ones and, in a table, shows a raft of essential pieces of transport infrastructure. Six of these relate to the Salisbury Transport Strategy totalling £23.4m but, other than reference to J17 (M4) capacity, there is nothing for Chippenham despite its crucial significance to

Wiltshire's growth plans. The Wilts Infrastructure Delivery Plan 2011/2026 (Feb 2012) which will become the CIL bible, worryingly still refers to the old Chippenham strategic sites and to the Chippenham Transport Strategy which was completely discredited during the EIP. I appreciate that there was an earlier consultation which gave the opportunity to comment on matters relating to CIL and that there will shortly be a further consultation on modifications to the emerging Core Strategy. However it is hard for a layman to work out how, when and where to comment on what, and therefore I would like all the above to be taken into account now as I believe that all this is relevant in ensuring the development plans are as informed as possible from the outset of the preparation process (see below). I would therefore be grateful if you would acknowledge this note as a formal submission to the consultation referred to below (see Notice attached), and I much look forward to your response to the matters referred to above, in particular the potential constraint placed upon Chippenham's potential growth in direct contradiction to para 3.6.3 of the SA Addendum, which would appear to encourage the opposite.

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| 33 | Melksham  | Melksham Town Council recently consider Wiltshire Council's request for sites as part of the Wiltshire Housing Site Allocations DPD. The Town Council noted several Wiltshire Council owned sites may become available in the near future once the Library and Canberra Youth Centre move into the new Campus and questioned whether these sites could be considered appropriate for future housing development.   |
| 34 | Sherston  | I act for Messrs T & P Moody. Upper Stanbridge Farm, Sherston. I attach plan with red and blue edged land owned by my clients. The Wiltshire Council have contractual provision to re-purchase the land edged red at agricultural value on production of a planning consent The area edged red is eminently suitable for a number of village facilities including possible extension of the school, additional car parking, doctors surgery and allotments. The land edged blue is suitable for over 55's bungalows, market and affordable housing. The total area is 8 acres. |
| 35 | General   | Dilton Marsh Parish Council resolved at its Parish Council meeting held on 17 April 2014 that the following comments be sent to Wiltshire Council in respect of the consultation on the Wiltshire Housing Site allocations: Dilton Marsh Parish Council does not believe that any review of the Village Policy Limits is appropriate. Dilton Marsh Parish Council strongly opposes any review of the Policy Limits to the west of Westbury (east of Dilton Marsh) because it would place in jeopardy the valued rural buffer between Westbury and Dilton Marsh.                |
| 36 | General - | I am writing in response Wiltshire Council's consultation on the HSA process. As an ordinary member of the public, I do not fully understand the legal jargon surrounding the HSA process, but having read the Calne Community Area Action plan from 2006  |

Studley felt reassured that the following statement "It has also been agreed that the villages of Derry Hill, Studley and Heddington, should receive only limited infill housing development, appropriate for local housing needs". Having lived in the hamlet of Studley for 27 years and my husband's family for over 50, we have been extremely happy bringing our children up in a rural community where we can appreciate all the aspects of nature and rural country and community life. Whilst we accept some change is inevitable and we do appreciate the Council are in a very difficult position, please consider the commitment of 2006 to protect the villages with just infill and consider that for a rural county like Wiltshire, the extreme damage changing boundaries could do to our historically smaller communities long term for future generations - will they get to enjoy and understand seeing hares, deers, badgers etc - riding horses and walking along country lanes in safety, will people from towns be able to continue walking up lanes and enjoying the peace and tranquillity away from town life - or are you threatening to engulf these small communities, with large, disproportionate housing developments. Whilst we accept we need to take our infill % of housing, the council should also consider that redefining communities as 'large villages' by joining villages and hamlets for planning purposes- the fear is that developers, planners and the council will fail to see the communities as individual settlements - which they have been for many 100's of years and our natural boundaries will be altered to accommodate housing stock - thus the natural community element will be lost forever, which will be incredibly sad, not just for the people living there, but for the people who want to walk, ride, run and cycle to enjoy the natural environment without having to go miles from towns to do so. I hope you will take into account the considerations of Wiltshire people and the commitments that were originally made to these communities when you review the Housing Site Allocations.

37 General - Studley I would like to respond to the Council's consultation on the HSA process. I accept the constraints of the national planning framework and emerging core strategy, but I believe it is important that the boundary review and the allocation process HSA DPD properly reflect the circumstances which existed before we were defined as a large village (Studley/Derry Hill). As an interim measure, before the core strategy is completed, some of the policies should be kept from the North Wilts Local Development Plan. The distinct Studley and Derry Hill boundaries, for example. In the Calne Community Area Action Plan 2006/2014 (amended in 2010) it stated - "It has also been agreed that the villages of Derry Hill, Studley and Heddington, should receive only limited housing development, appropriate for local housing needs." Therefore I believe the boundary review must recognise and include these previous policies. Also it should recognise that large villages may comprise of distinct components with intermediate boundaries and gaps that should also be respected. Thank you for this opportunity to respond.

38 General Many thanks for the above consultations. I can confirm that Natural England has no comments to make with respect to the

scope of these DPDs.

- 39            General        Reference: Scope and Content of the Draft Wiltshire Housing site Allocations DPD Further to the current consultation on the scope of the HSA DPD I have the following comments about the scope of the document where a hamlet or small village has been aggregated with a larger neighbour and re-defined as a 'large village' for planning purposes under the emerging core strategy: 1. In such cases the scope of this document must cover the practical effect of housing site allocations within the settlement through the core strategy process. The national planning framework does, and the emerging core strategy will, provide policy constraints. However, at a practical level the boundary review and the allocation process /HSA DPD can still properly reflect the circumstances which existed before the large village definition became effective. In particular, the scope should address the scale and character of the former village/hamlet, and the impact of any natural boundaries or distinct 'subsections' within a settlement that in whole or part has been newly defined as a large village for planning purposes. 2. As part of the HSA DPD, I understand that settlement boundaries will be reviewed. I would draw your attention to the inconsistency between Core policy 1, 4.13 and 4.15 relative to the way in which the settlement boundary will be reviewed: Para 4.13: 'These settlement boundaries will be reviewed as part of the Wiltshire Housing Site Allocations and Chippenham Site Allocations DPDs, as set out in the Councils Local Development Scheme, in order to ensure they are up to date and can adequately reflect changes which have happened since they were first established.' On the other hand , Para 4.15 is written as follows: 'These settlement boundaries will also be reviewed as part of the Housing Site Allocations DPD as set out in the Council's Local Development Scheme, in order to ensure they remain up to date and properly reflect building that has happened since they were first established.' I urge you to clarify that in the HSA process the definition used in 4.15 is adopted, and that only physical changes are taken into account in the boundary review - rather than the policy change to define two previously physically separated areas as one. 3. Given that neighbourhood plans are at such an early stage of preparation, the HSA DPD should from the outset adopt an assumptions that large villages may comprise distinct components with intermediate boundaries and gaps which must be respected I trust these points are clear.
- 40            West Tisbury        At their meeting on 3rd April 2014, West Tisbury parish councillors considered the above document and resolved to make the following response at this stage of the process: The re-use of old farm buildings and brown field sites is preferred rather than development on green field sites High density developments will be resisted Development of Small plots in the outlying settlements would be preferred to large scale development. Further consultation with the community through the neighbourhood planning process will determine other criteria Site S68 - Land opposite The Avenue, Tisbury - this land is on the

flood plain, Site 100 - Land at Tuckingmill Highways Depot - this area was a filled-in quarry and is contaminated land, Site 3085 - Land and disused quarry at Tuckingmill - this is an area of special wildlife interest.

- 41 Tisbury Thank you for inviting us to comment on this proposal. We should like to comment as follows: Site 59 - Land adjacent to Tuckingstones - this is a Greenfield site which dominates the village. It may be suitable for very low density development but a large number of houses on this site would be detrimental to the landscape in the AONB and the character of the village. Site S68 - Land opposite The Avenue, Tisbury - this land is on the flood-plain and should be taken out of the SHLAA as it is unsuitable for development, Site S75 - Land at Station Works, Tisbury - this is a brownfield site which preferably should be retained for employment and/or mixed use, but not retail development. Site 100 - Land at Tuckingmill Highways Depot - this area is quarry infill and is possibly a contaminated site. Site 3085 - Land and disused quarry at Tuckingmill - this area is a significant wildlife site and is unsuitable for housing development. It should be taken out of the SHLAA. Site 3171 - Land north of Vicarage Road - this land is on a very steep slope near a geological fault line. The only access to the Highway is on a sharp bend at the bottom of a hill, at a point where the lane is known to get flooded. It is most unsuitable for development. It also dominates the western approach into the village and would be detrimental to the landscape in the AONB. It should be taken out of the SHLAA. Our preferred criteria for the choice of suitable sites are as follows: The re-use of old buildings and brown field sites is preferred. High density developments should be resisted. Small scale developments of infill plots in or on the edge of existing settlements are preferred. Small scale ribbon development between settlements is preferable to the development of Greenfield sites. 'Back land' development should not be permitted. Developments on flood plains should not be permitted. Views of local residents should be given more credence than at present
- 42 Winterslow Your letter: WCHSA/446593 dated 20 March 2014 refers. Your letter calls for representations on the proposed scope of the documents. In regard to Winterslow, a parish plan and a village design statement have been completed in the past 3 years, both documents being approved and endorsed by the relevant committees of the Wiltshire Council. The VDS in particular detailed sites suggested by residents that were felt appropriate for development. I am therefore unsure of the objective of your new survey as I assume you will have seen the VDS. At the same time as you are engaging in your consultation, Winterslow has already embarked on a neighbourhood plan project. Please could you advise how your development plan document and the village neighbourhood plan will mesh together, as it seems to me that the 2 could well be contradictory - in that your proposed documents may be suggesting a strategy at odds with what the village decides in its neighbourhood plan.

- 43 Alderbury Submission to support amendment to Housing Settlement Boundary- Alderbury Wiltshire Housing Site Allocations DPD Two maps are attached showing the boundary for the proposed extension to the current village settlement boundary. In support of the representation the following points are made. 1. The land is level and forms the gardens to a number of houses. 2. Should the land be developed in the future the existing dwellings would all still retain good sized gardens 3. There are no trees subject to TPO's on the land. 4. The land is on the approved list of SHLAA sites reference number S197. 5. There are a number of potential access points, via the lane to the north east of the proposed extension; by the potential demolition of an existing dilapidated and unoccupied dwelling (Oakfield); or through land which is subject to a right of way running along the south western boundary of the house known as Snowflakes (previously Aspenglow). 6. The character of the land is identical to recently developed land to the north of Oak Acre and Parkside ( immediately to the north east) and also to the land which now forms South Way and Birch Grove to the east of Rectory Road. The latter having been developed around 15 years ago. 7. Consultation in 2007 through the parish plan identified the communities wish for small scale local infilling in Alderbury rather than large scale housing developments. This site exactly fits that category. 8. Placement of this land within the settlement boundary will allow the various landowners to come together in the long term to bring the land for development in a way that meets their views as to the shape and character of any residential development. 9. Rectory Road is an adequate highway to serve a greater level of usage for the modest level of development that the extension would bring. 10. The site is 100% garden land. 11. There are good local transport links with the bus stop for Alderbury/ Southampton passing within 150m of the site. 12. When the site was put forward for the SHLAA this had the full support of all the landowners which means the issue of multiple ownership can be overcome for future redevelopment. This application has been made by David Rusholme, owner in April 2014.
- 44 Lydiard Tregoz Your letter dated 20th March 2014 referring to Two new Development Plans was read and discussed at this month Parish Council meeting. After a lengthy debate it was agreed by all council members it is for the parish to decide what action to take with regards to future development. If at such time a Local Development Scheme should be discussed the parish council should wish to have the prime say on the matter. Therefore the parish council do not wish to partake in the consultation period of the DPD.
- 45 Alderbury & Whiteparish WILTSHIRE HOUSING SITE ALLOCATIONS DEVELOPMENT PLAN DOCUMENTS (DPD): REPRESENTATIONS IN RESPECT OF HOUSING DELIVERY & SETTLEMENT BOUNDARIES I act on behalf of the owners of land at Oaklea Lane, Alderbury and Romsey Road, Whiteparish. I have been asked to submit representations to you as part of the consultation on the future Site Allocations

DPD. My clients' landholdings fall within settlements identified as Large Villages within the Wiltshire Core Strategy. However, they are beyond the settlement boundaries as previously defined in the Salisbury District Local Plan. The residential development potential of each site has previously been highlighted through the Strategic Housing Land Availability Assessment (SHLAA) process. Plans and the historic SHLAA appraisal summaries are attached to this letter. Could you therefore please also accept this letter of representation as a new SHLAA submission, as both of the sites remain available for development. In the context of my clients' interests, it is considered that a key issue for the DPD is the extent to which sites, such as the ones identified with this letter, can contribute to the overall housing requirement of the Southern Wiltshire Community Area. The importance of this is highlighted by the increase in the housing delivery targets from those set out in the Core Strategy Pre-Submission Document of 2012. This is demonstrated in the table on the following page.

Table Area	CS Pre-Submission	Proposed Modifications	Variatio	(February 2012)	(From Exam 101, April 2014)
Downton 1	190	190	0	Remainder	365
Community Area Total	555	615	+60	Given that the figure for Downton has not changed, it is all the more important to identify and allocate sites for residential development in the larger villages. Wiltshire Core Policy 24 identifies these as:	1. Alderbury 2.. Coombe Bissett 3. Morgan' Vale I Woodfalls 4. Pitton 5. Whiteparish 6. Winterslow I Middle Winterslow

Of these, Morgan's Vale I Woodfalls, Pitton and Winterslow I Middle Winterslow are in rural locations, with limited facilities, and at some distance from the strategic road network. However, Alderbury and Whiteparish are two of the larger settlements where additional development would support the existing facilities. They are also situated on or adjacent to main roads; the A36 in the case of Alderbury; and the A27 in the case of Whiteparish. It is considered important for the DPD to carry out a detailed Sustainability Appraisal of each of the larger villages, and for the allocation of suitable sites for development as a consequence of this work. In particular, the requirement to accommodate 425 dwellings on sites in the larger villages is likely to require settlement extensions and alterations to settlement boundaries, as there will be limited opportunities to accommodate substantial development through infilling or the re-development of existing sites and properties. The historic SHLAA's indicated that the subject sites have the potential to accommodate the following number of dwellings: Oaklea Lane, Alderbury -36 Ramsey Road , Whiteparish -54 These sites can therefore accommodate approximately 20%of the total required for the South Wiltshire Community Area. Each site is also of a sufficient size to accommodate the required quota of affordable housing, in accordance with Core Policy 43. Affordable housing delivery is also considered to be a key issue for the DPD to deal with. Whilst the Core Strategy sets out the principle policy framework, delivery will come from two main sources of supply; through direct development on large sites; and through the development of as yet unidentified sites, constructed following the 'pooling' of financial contributions from small sites. The latter is likely to be a longer process, whereas the former can provide a faster route to delivery. Thank you for the opportunity to submit these comments on the DPD. As set out earlier, would also be grateful if



you could register this continued interest on the SHLAA.

- 46        General        Thank you for your letter to GPSS, Government Pipelines and Storage Systems dated 20 March 2014 regarding the above. Please find attached a plan of our clients apparatus. We would ask that you contact us if any works are in the vicinity of the GPSS pipeline or alternatively go to [www.linesearchbeforeudig.co.uk](http://www.linesearchbeforeudig.co.uk) our free online enquiry service.
- 47        Chippenham        Please find attached to this email our completed Call for Sites submission form relating to land at Saltersford Lane, Chippenham.
- 48        Bradford on Avon        Bradford on Avon Town Council considers the scope of this documents to be relevant and important to the process of finalising the emerging Wiltshire Core Strategy and, in the light of continuing pressure on the town, requests Wiltshire Council to undertake the work required without delay, The Town Council also requests that the scope of the document should take into account the work currently in progress on the Bradford on Avon Neighbourhood Plan.
- 49        Salisbury        WILTSHIRE HOUSING SITE ALLOCATIONS DEVELOPMENT PLAN DOCUMENTS (DPD): REPRESENTATIONS IN RESPECT OF HOUSING DELIVERY I act on behalf of the owners of land at Nadder Bank, Middle Street, Salisbury. I have been asked to respond to your invitation to make comment on key issues to be addressed in the future Housing Site Allocations DPD. The land owned by my clients is identified on the first plan attached to this letter. It currently falls just beyond the settlement boundary to the city. Historically, it was also identified as being in an area of potential flood risk. It is considered important that the City of Salisbury continues to act as the principal focus for development in South Wiltshire. The Core Strategy requires 6,060 new homes to be built in the period 2006 -2026. Taking into account housing already provided for (completions and specific permitted sites) and the strategic sites, land for the development of 340 dwellings still has to be identified. A review of the settlement boundary will assist in meeting the housing delivery target. In the specific case of the land at Nadder Bank, Middle Street, there has been a material change in circumstances to merit an alteration to the settlement boundary in this part of the city. In 2008, planning permission was granted to the Environment Agency for the construction of improved flood defences by way of the installation of new sheet piles, raising existing flood defence banks; and constructing new flood walls and banks. The effect of the implementation of this approval is to remove Nadder Bank from an area previously prone to potential flooding. The Flood Risk Assessment that accompanied the application contains two plans showing the extent of the flood risk area in a 1 in 200 year event -before construction of the new defences -and after. The plans are attached to this letter. It can be seen that Nadder Bank, together with other land to the north of Middle Street, is now afforded full protection from flooding. It is

therefore submitted that the line of the improved flood defences can form one way in which the settlement boundary can be re-defined, thus opening up opportunities to develop land within the urban area so as to meet the required strategic housing target. Thank you for the opportunity to put forward representations on the scope of the DPD.

- 50            General            Thank you for consulting EH on the intention to produce the above. The selection of sites for development needs to be informed by the preparation of a robust evidence base and the DPDs should avoid allocating those sites which are likely to result in direct and indirect harm to the significance of heritage assets. The relevant tests for assessing harm to the significance of heritage assets are NPPF para 132 onwards. The vital issue of setting can be considered by ensuring your evidence base applies The Setting of Heritage Assets (EH Oct 2011) <http://www.english-heritage.org.uk/publications/setting-heritage-assets/setting-heritage-assets.pdf> The impact of necessary associated infrastructure to facilitate the delivery of large scale development can have a profound effect on the character of historic places and must be considered. It will be important to ensure the significance and integrity of Wiltshire's historic towns and villages are conserved.
- 51            General - Studley            Reference: Response to Consultation: Scope and Content of the Draft Wiltshire HSA DPD I am writing in response to the Council's consultation on the HSA process. Whilst accepting the constraints of the national planning framework and emerging core strategy, it is imperative that the boundary review and the allocation process HSA DPD correctly reflects the circumstance which existed before Studley was defined as a large village, incorporated with Derry Hill. Until the core strategy is fully in place, as an interim measure some policies were 'saved' from the North Wilts Local development Plan. These include for example, distinct Studley and Derry Hill boundaries. In the Calne community Area Action Plan 2006-2014 (updated in 2010) it was also stated 'It has also been agreed that the villages of Derry Hill, Studley and Heddington, should receive only limited infill housing development, appropriate for local housing needs.' That sentence clearly implies that Studley was defined as a separate village. <http://www.wiltshire.gov.uk/ccap-update-2010.pdf> The boundary review must therefore recognise and incorporate these previous policies. It should also recognise that large villages may comprise of distinct components with intermediate boundaries and gaps that should also be respected.
- 52            General            I have concerns regarding the scope and content of the draft Wiltshire HSA DPD, as part of the Wiltshire HSA DPD, I understand that settlement boundaries will be reviewed. However there appears to be an inconsistency between Core policy 1, 4.13 and 4.15 relative to the way in which the settlement boundary will be reviewed: Para 4.13: These settlement boundaries will be reviewed as part of the Wiltshire Housing Site Allocations and Chippenham Site Allocations DPDs, as set out in the Council's Local Development Scheme, in order to ensure they are up to date and can adequately reflect changes which have happened

since they were first established. Para 4.15 These settlement boundaries will also be reviewed as part of the Housing Site Allocations DPD as set out in the Council's Local Development Scheme, in order to ensure they remain up to date and properly reflect building that has happened since they were first established. Can you look into and clarify than in the HSA process the definition used in 4.15 is adopted, and that physical changes only are used in the boundary review " rather than the policy change to define two previously physically separated areas as one.

- 53 General In addition to the Housing Site Allocations DPD identifying sites for market and affordable housing, I think the scope should extend to consider self build plots and live work units. Both these offer a more affordable way of obtaining a home or setting up/running a small business.
- 54 Calne In the Planning Shlaa Appendix 3 Calne document on page 17 the above land is proposed for building houses on. I would like to object to the above land being proposed for use for building housing on. If I need to direct this objection to someone else please let me know. In the outline planning application for the Silver Street development (11/03628/OUT) the applicant said they were going to make an application to build 60 houses on this land. I would guess that would result in 100 cars leaving and entering the estate each day. I do not believe Wenhill Heights/Marden Way or Wenhill Lane are suitable to carry this amount of additional traffic. In the application for Phase 1 of the Silver Street development (13/06774/REM) the following comment about Wenhill Lane was made in relation to the original plan to put 18 allotments on the field up the hill from the lane. The allotment proposal has a number of car parking spaces which would require access via Wenhill Lane. Our warden says he has had a lot of issues with Wenhill Lane, it is only a footpath but illegal parking has sometimes prevented residents getting to their properties and the public have no legal right to drive on it unless they have the express permission of the landowner. It is very narrow and lorries to the depot at the sewage works would find access more difficult if there is an increase in traffic using the lane. There would be a negative impact on the safety of rights of way users. While the provision of the allotments is to be supported the proposed access is unacceptable, so for the above reasons we object to this part of the planning application. If Wenhill Lane is unsuitable access for 18 allotments then it is surely unsuitable for 60 houses.
- 55 General I am writing to state my objection to the changes to the Core Strategy which propose housing and other associated developments on all the land between Langley Burrell and the A4 to the east of Chippenham for the following reasons : The development would result in the destruction of an area of great natural beauty and tranquility, which is a valuable resource for the people of Chippenham as well as for those lucky enough to live in the area. The beautiful meadows running down to the place where the Marden and the Avon rivers meet would be irreversibly destroyed for posterity. Building on the higher ground

at Peckingell and New Leaze Farm would ruin the views from the river valleys. The natural river environment consisting of important wildlife habitats would be badly degraded by housing development. The cycle path along the former track of the branch line railway to Calne is a wonderful resource created for everyone in Chippenham. From it there are uplifting views of the Cherhill monument and the downs, and the walker or cyclist has an immediate sense of emerging into a quintessential Wiltshire landscape right on the doorstep of the town. This amenity would be destroyed for ever by building a housing estate between Hardens Farm and New Leaze Farm. This year there have been extensive floods over a prolonged period, of both the river Avon and also the river Marden. Development of the catchment areas would lead to greater run-off and worse flooding. The economic centre of gravity of Chippenham is now to the west of the historic town centre, in the Bumpers Farm and Methuen Park industrial estates and the housing at Cepen Park, and it is this development which should be continued. The A350 around the west of Chippenham was constructed from the outset with a view to being widened to a dual carriageway. Modern economic activity cannot be based around the now dead idea of a town with an old fashioned 'high street'. There is no logical reason why such a historic centre should be geographically located in the centre of the town as it grows.

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| 56 | Malmesbury           | Please find attached representations on the following site which Hannick Homes would like considered within the emerging Housing Site Allocations DPD and associated settlement boundary review: Land at Park Road, Malmesbury                           |
| 57 | Minety               | Please find attached representations on the following site which Hannick Homes would like considered within the emerging Housing Site Allocations DPD and associated settlement boundary review: Land at Rylands, Minety                                 |
| 58 | Lydiard<br>Millicent | Please find attached representations on the following site which Hannick Homes would like considered within the emerging Housing Site Allocations DPD and associated settlement boundary review: Land at The Mews, Lydiard Millicent                     |
| 59 | Broad Town           | Please find attached representations on the following site which Hannick Homes would like considered within the emerging Housing Site Allocations DPD and associated settlement boundary review: Land South of Broad Town CoE Primary School, Broad Town |
| 60 | Purton               | Please find attached representations on the following site which Hannick Homes would like considered within the emerging Housing Site Allocations DPD and associated settlement boundary review: Land South of Jewels Ash, Purton                        |
| 61 | Devizes              | Please find attached representations on the following site which Hannick Homes would like considered within the emerging   |

- Housing Site Allocations DPD and associated settlement boundary review: Land South of Marshall Road, Devizes
- 62 Lydiard Millicent Please find attached representations on the following site which Hannick Homes would like considered within the emerging Housing Site Allocations DPD and associated settlement boundary review: Land South of Stone Lane, Lydiard Millicent
- 63 Semington Please find attached representations on the following site which Hannick Homes would like considered within the emerging Housing Site Allocations DPD and associated settlement boundary review: Land South of St Georges Rd, Semington
- 64 General We act on a behalf of a landowner at North Bradley and would offer the following comments on the proposed scope of the above document. We welcome the proposed DPD adopting a Wiltshire-wide approach and the inclusion of a range of settlement sizes as new development is equally vital to the vitality and future well-being of Large Villages as it is to Principal Settlements. The proposed DPD should consider sites which are deliverable and of varying sizes to ensure new housing is not concentrated on sites regarded as strategically important. A range of sites will ensure the distribution and delivery of housing across the County and will widen choice for developers in the provision of housing supply. In addition to housing sites, the proposed DPD should allow for the potential of housing sites to meet needs for a range of complementary land uses including employment, education, leisure and open space. The proposed DPD should give particular attention to allocating/identifying sites in settlements where there is no likelihood of a Neighbourhood Plan coming forward. In these areas it is important that a site can be promoted for development and assessed for its appropriateness through the DPD route otherwise the only recourse available to land-owners is through the submission of planning applications/appeals. Thank you for your consideration of these points.
- 65 General We support the idea that housing growth in Wiltshire is essential to meet the needs of a growing local population. As the emerging Wiltshire Core Strategy DPD is not finalised the policy framework for identifying suitable housing sites is not available. However we would like to maintain the small village category which is relevant to local rural communities. This implies that any new housing in small rural communities should be proportionate to village size and sensitively developed within that community. This applies whether it is infill housing of one or two properties or a small development of rural properties to meet local need. At all stages development must be planned and delivered with local people at the heart, since they are the community that must make new housing a success for those living in the village. It must take account of existing infrastructure and the wishes of residents in order to achieve a sustainable future for all. Towns and larger villages obviously have more scope for development, but smaller villages will play their part in ensuring the long term viability (and vibrancy) of their community.

Development potential must be consulted upon with not only the Parish Council and Area Board, since the majority of residents do not appear to engage with these. Alternative ways of including rural communities must be sought or existing fora must demonstrate that they are accessible and relevant to all. More communication on the emerging Wiltshire Core Strategy DPD would be a good place for Wiltshire Council to start so that rural communities feel that consultation is more than a formal exercise and that they can actively contribute to development in their own villages.

- 66            General            Thank you for consulting Gloucestershire County Council on the above matter. I have the following officer level comments to make: Wiltshire Housing Site Allocations DPD Biodiversity In identifying sites for housing delivery close to the boundary with Gloucestershire the impact on North Meadow & Clattinger Farm SAC will need to be screened as part of a Habitats Regulation Assessment of the DPD. In addition the Cotswold Water Park Masterplan & Biodiversity Action Plan and the Gloucestershire Nature Map might be material considerations. Further details can be found at: <http://www.waterpark.org/looking-after/resources-documents/> and <http://gloucestershirebiodiversity.net/actionplan/nature-map.php> Transport In identifying potential housing sites close to the boundary with Gloucestershire the impact on the County road network will need to be taken into account and particularly the A419/417. Mitigation measures will need to be considered where appropriate. I look forward to being kept informed of future progress regarding these documents.
- 67            General            Wiltshire Housing Site Allocations DPD On behalf of our client, Commercial Land, we have been instructed to submit representations with regard to the proposed scope for the Housing Site Allocations DPD. As a landowner within Wiltshire, our client welcomes the proposal to produce this document and the opportunity it offers for appropriate sites to be considered in terms of their potential contribution to meeting the ongoing demand for new housing in Wiltshire. We note the recent proposal, in response to comments from the appointed Planning Inspector, to amend draft Core Policy 2 within the proposed Core Strategy in order to increase the delivery of new housing from 37,000 to 42,000 additional units in the period from 2006 to 2026. In light of this, it is essential that all potential sites for residential development are considered again in order to support this extended provisioning of new housing . Our client holds interests in two sites within Wiltshire which were originally submitted for consideration and assessed as part of a Strategic Housing Land Availability Assessment in 2007. It is our understanding that these sites will continue to be considered as part of the current consideration of potential Housing Site Allocations. In addition to considering specific sites, it is also considered to be appropriate to assess again the limits of development and development boundaries that have been established around some towns and villages within Wiltshire. Given the need to identify sites for an additional 5,000 residential units, it is not realistic to consider that the entirety of this can be

accommodated without expansion of at least some of the existing towns and villages. Any assessment of the potential designation of sites for residential development must be undertaken in the context of the presumption in favour of sustainable development that underpins the national planning guidance set out within the National Planning Policy Framework (NPPF). In short, any site (regardless of its location) could provide an appropriate opportunity for residential development so long as it can be shown that it would be sustainable. In many cases, there is little or no difference in terms of the sustainability of a site whether it is located inside or outside of a designated development boundary. However, where such designations exist there is a risk that the site outside will not be considered and therefore its potential contribution to meeting an increased housing target will also be ignored. It is reasonable therefore to consider whether specific development boundaries are actually required. There is the potential that sufficient suitable sites can be identified throughout Wiltshire from either the Site Allocations consultation or proposed as part of Neighbourhood Plans and assessed in the context of sustainable development without a need for formal development boundaries around towns and villages. As such, we would therefore propose that the scope of the Site Allocations DPD should include the following: 1) A full assessment or reassessment of all potential sites for residential development within Wiltshire, including both those that have been submitted previously and those that may be put forward for the first time as part of this consultation; and 2) A full review of all existing development boundaries and/or limits of development to identify whether there are either appropriate residential development sites outside of the existing boundaries or alternatively whether residential development can be better served by the removal of designated boundaries in order to assess all potential sites in the context of sustainable development. I trust that these comments will be taken into account and that there will be further opportunities to take a fuller part in further consultations on this DPD in the future.

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General

Thank you for the invitation to comment upon the preparation of the development plan documents for Wiltshire and Chippenham. The following comments are made on behalf of Wessex Water acting as the water and sewerage undertaker. Planning Policies We acknowledge that the introduction of the NPPF has replaced significant areas of policy guidance, in particular PPS 25 Flood Risk and PPS 23 Pollution. We have previously placed a great reliance upon a number of these policy documents to support the services we provide. This consultation provides Wessex Water with an opportunity to promote a range of policies drafted to support the activities of a water and sewerage undertaker and protect existing assets associated with these essential services. Please see attached range of policies for your consideration. We are aiming to provide a consistent approach across the region and will be promoting these policies to all planning authorities across the Wessex Water region. There is a preference for these to be considered and where possible incorporated within the Core Strategy policies, however we recognise this will not be possible owing to the advanced stage of the programme. We request that the Council

consider inclusion within the proposed Development Plan Documents and then at a future review of the Local Plan. Existing Assets The adoption of the attached planning policies to avoid encroachment upon existing assets will in particular prevent the risk of statutory nuisance from odour at sewage treatment works. The use of development restraint zones around the works will ensure that appropriate assessments are completed in support of any development proposals. Capacity Planning Wessex Water will continue to invest in strategic capacity for new development over the plan period. This includes water resources, sewage treatment, trunk mains and trunk sewers. Where these schemes are development led it may be appropriate to nominate these schemes within the supporting Infrastructure Delivery Plan. Where the scale of new development proposals require off site reinforcement for water supply and sewerage networks we will need to complete suitable engineering assessments. The master-planning process normally provides a suitable opportunity to develop a strategy for capacity improvements and where possible these improvements will be phased to match the rate of development. We will be pleased to participate in master-planning arrangements where appropriate. This will ensure that we remain within existing consents and permits and provide satisfactory service levels to all customers. We request that development plan documents recognise the need for the developer working with Wessex Water to complete supporting assessments for water and sewerage and confirm the scope of necessary improvements. Flood Risk Fluvial flood risk is recognised within the planning process and is adequately considered. Recent groundwater flooding occurred across the Council area and affected many settlements. These incidents affected both domestic and business customers for lengthy periods with public and private sewer systems suffering from rising groundwater levels. We will be seeking appropriate groundwater management strategies and mitigation plans in conjunction with all risk management authorities under the Floods and Water Management Act. If we are unable to agree these mitigation measures we will be unable to support new development within vulnerable areas. We will consider objections where the severity and consequences of sewer flooding are at increased risk. We will be seeking further discussions with your council on this matter and agreement with all stakeholders on groundwater management.

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General

I am writing in response to the Council's consultation on the HSA process. It appears that, as part of the HAS DPD these settlement boundaries will be reviewed. However, it is important to note that there may be some inconsistencies between the two sections of the core policy shown below: Para 4.13: These settlement boundaries will be reviewed as part of the Wiltshire Housing Site Allocations and Chippenham Site Allocations DPDs, as set out in the Council's Local Development Scheme, in order to ensure they are up to date and can adequately reflect changes which have happened since they were first established. Para 4.15 "These settlement boundaries will also be reviewed as part of the Housing Site Allocations DPD as set out in the Council's Local Development Scheme, in order to ensure they remain up to date and properly reflect building that has happened since



they were first established." There is a serious concern that the definition used in 4.15 is adopted, and that physical changes only are used in the boundary review - rather than the policy change to define two previously physically separated areas as one. The effect of combining two areas of very different character, topography and layout even if adjacent, can have profound detrimental effects to the hamlet involved.

70            General            Thank you for your letter dated 20th March notifying the Cranborne Chase AONB of this consultation. We have looked at your documentation and have had discussion with two of the other AONBs within your Council's area. We would therefore like to endorse the comments of the North Wessex Downs AONB, and I have copied these comments below for your convenience. The North Wessex Downs AONB Unit wish to respond to the Wiltshire Housing Site Allocations DPD scoping consultation: The Council have a legal duty to consider the conservation and enhancement of the AONB under Section 85 of the CRoW Act 2000 and they are a partner in the production of its Management Plan. In the production of a Site Allocations DPD due consideration should be given to the purposes of conserving and enhancing the AONB and specific reference should be made to its Management Plan and the attached Approved Housing Position Statement and Approved Setting Position Statement. The North Wessex Downs AONB Unit made detailed submissions to the Core Strategy Hearings as to the correct approach to housing provision within the Wiltshire AONBs (44% of Wiltshire is within an AONB). We attach again copies of our Hearings Submissions from 2013 on Matter.1. and Matter.4. and in relation to the proposed delivery of housing to the Marlborough and Pewsey Areas to highlight our previous objections. Further to this specific changes to the Core Strategy (tracked changes version November 2013) were secured following the Hearings in specific relation to the approach to the AONBs. These include the changes from supporting paragraphs 6.73 onward and in specific relation to CP51 Landscape. We therefore request that these changes are also taken into consideration before undertaking the Site Allocations DPD work. Additional text was also added at 6.74 of the Core Strategy for the provision of a Landscape Strategy for Wiltshire in early 2015. We recommend that a Landscape Strategy should be undertaken before or in conjunction with the Site Allocations DPD, to help guide development and settlement boundaries in specific reference to the AONBs and sites outside but within the setting of the AONBs. We would be happy to meet with Officers again to discuss our comments.

71            General            Network Rail has been consulted by Wiltshire Council on the Wiltshire Housing Site Allocations DPD. Thank you for providing us with this opportunity to comment on this Planning Policy document. This email forms the basis of our response to this consultation request. Network Rail is a statutory undertaker responsible for maintaining and operating the country's railway infrastructure and associated estate. Network Rail owns, operates, maintains and develops the main rail network. This includes

the railway tracks, stations, signalling systems, bridges, tunnels, level crossings and viaducts. The preparation of development plan policy is important in relation to the protection and enhancement of Network Rail's infrastructure. In this regard, please find our comments below.

**Developer Contributions** The Wiltshire Housing Site Allocations DPD should set a strategic context requiring developer contributions towards rail infrastructure where growth areas or significant housing allocations are identified close to existing rail infrastructure. Many stations and routes are already operating close to capacity and a significant increase in patronage may create the need for upgrades to the existing infrastructure including improved signalling, passing loops, car parking, improved access arrangements or platform extensions. As Network Rail is a publicly funded organisation with a regulated remit it would not be reasonable to require Network Rail to fund rail improvements necessitated by commercial development. It is therefore appropriate to require developer contributions to fund such improvements. Specifically, we request that a Policy is included within the document which requires developers to fund any qualitative improvements required in relation to existing facilities and infrastructure as a direct result of increased patronage resulting from new development. The likely impact and level of improvements required will be specific to each station and each development meaning standard charges and formulae may not be appropriate. Therefore in order to fully assess the potential impacts, and the level of developer contribution required, it is essential that where a Transport Assessment is submitted in support of a planning application that this quantifies in detail the likely impact on the rail network. To ensure that developer contributions can deliver appropriate improvements to the rail network we would recommend that Developer Contributions should include provisions for rail and should include the following: A requirement for development contributions to deliver improvements to the rail network where appropriate. A requirement for Transport Assessments to take cognisance of impacts to existing rail infrastructure to allow any necessary developer contributions towards rail to be calculated. A commitment to consult Network Rail where development may impact on the rail network and may require rail infrastructure improvements. In order to be reasonable these improvements would be restricted to a local level and would be necessary to make the development acceptable. We would not seek contributions towards major enhancement projects which are already programmed as part of Network Rail's remit.

**Level Crossings** Development proposals' affecting the safety of level crossings is an extremely important consideration for emerging planning policy to address. The impact from housing development and associated facilities/infrastructure can result in a significant increase in the vehicular and/or pedestrian traffic utilising a crossing which in turn impacts upon safety and service provision. As a result of increased patronage, Network Rail could be forced to reduce train line speed in direct correlation to the increase in vehicular and pedestrian traffic using a crossing. This would have severe consequences for the timetabling of trains and would also effectively frustrate any future train service improvements. This would be in direct conflict with strategic and government aims of improving rail services. In this regard, we

would request that the potential impacts from development affecting Network Rail's level crossings, is specifically addressed through planning policy as there have been instances whereby Network Rail has not been consulted as statutory undertaker where a proposal has impacted on a level crossing. We request that a policy is provided confirming that: The Council have a statutory responsibility under planning legislation to consult the statutory rail undertaker where a proposal for development is likely to result in a material increase in the volume or a material change in the character of traffic using a level crossing over a railway: Schedule 5 (f)(ii) of the Town & Country Planning (Development Management Procedure) order, 2010 requires that... "Where any proposed development is likely to result in a material increase in volume or a material change in the character of traffic using a level crossing over a railway (public footpath, public or private road) the Planning Authority's Highway Engineer must submit details to both Her Majesty's Railway Inspectorate and Network Rail for separate approval". Any planning application which may increase the level of pedestrian and/or vehicular usage at a level crossing should be supported by a full Transport Assessment assessing such impact: and The developer is required to fund any required qualitative improvements to the level crossing as a direct result of the development proposed. Planning Applications We would appreciate the Council providing Network Rail with an opportunity to comment on any future planning applications or proposed site allocations should they be submitted for sites adjoining the railway, or within close proximity to the railway as we may have more specific comments to make (further to those above). We trust these comments will be considered in your preparation of the forthcoming Wiltshire Housing Site Allocations DPD document.

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General

The Highways Agency (the Agency) welcomes the opportunity to provide comments on the scope and content on the Housing Site Allocations (HSA) DPD. The comments in this letter reflect guidance contained in: the Department for Transport (OfT) & Department for Communities & Local Government (DCLG) publication entitled Guidance on Transport Assessment (dated March 2007); OfT Circular 02/2013 entitled The Strategic Road Network and the Delivery of Sustainable Development, dated 10 September 2013; and the National Planning Policy Framework (NPPF), published by DCLG in March 2012. Please note that the use of the term local plans in the OfT Circular is taken to mean all development plan documents prepared by the local planning authority (LPA), whatever their title. The Strategic Road Network in Wiltshire As you will be aware, the Highways Agency is responsible for operating, maintaining and improving the Strategic Road Network (SRN). The SRN within the plan's area comprises of the following routes: The M4, including Junctions 16 and 17; The A36(T) between the Hampshire and Bath & North East Somerset borders; The A303(T) between the Hampshire to Dorset borders; and A short section of the A419(T) close to Cricklade. Background The Agency has provided representations throughout the various consultation stages of the emerging Core Strategy. In April 2013, prior to the commencement of the Examination in Public, a Statement of Common Ground (the

Statement) was agreed between the Agency and the Council. The agreed position was that the Wiltshire Core Strategy was generally in compliance with the NPPF. However, the Agency submitted a number of additional comments as part of their representations on the Wiltshire Core Strategy Pre-Submission. Document consultation. Specifically, the Agency was supportive of Core Policies 1 (Settlement Strategy) and 2 (Delivery Strategy). The Agency considered that the settlement strategy and the hierarchy of settlement would help to ensure that development is directed to the most sustainable locations. The Agency was also supportive of the emphasis of development on previously developed land. However, the Statement did raise some concerns in relation to the omission of certain items from being listed in the Infrastructure Delivery Plan (IDP) which were considered necessary to achieve specific area strategies listed within the Core Strategy. Notably this applied to three Area Strategies (Malmesbury, Marlborough and Chippenham) along with Core Policy 3 (Infrastructure Requirements), due to the increased pressure anticipated on Junction 17 of the M4 by 2026. The agreed position was to include the junction improvements at Junction 17 in the IDP. Since the issuing of the Statement a new version of the IDP has been issued (IDP2, dated September 2013). The schedule within Appendix 1 of the IDP (entitled Wiltshire Strategic, Regional and General) refers to Capacity improvements to M4 Junction 17 (Reference WC 003) and is categorised as being essential infrastructure. The Agency would like to highlight that its level of interest in the DPD is likely to be proportionate to the scale of development proposed in each settlement covered and their proximity (or otherwise) to the SRN. Where settlements are distant from the SRN or allocations are small in scale, or both, then the Agency may not have concerns about traffic impact at all. DPD Scope and Content It is the Agency's understanding that the purpose of the DPD is to: a) identify sufficient land (in the form of sites) to accommodate the housing growth prescribed in the policies of the emerging Core Strategy, and to b) review boundaries of various categories of settlements outlined in draft Core Policy 1 in the emerging Core Strategy, as follows: 2 of the 3 principal settlements (Salisbury & Trowbridge); All 12 of the market towns (Amesbury, Bradford-on-Avon, Caine, Corsham, Devizes, Malmesbury, Marlborough, Melksham, Tidworth and Ludgershall, Warminster, Westbury, and Royal Wootton Bassett); Local Service Centres in the South Wiltshire Housing Market Area (HMA) -Tisbury, Mere, Downton and Wilton -4 of the 7 local service centres designated in the Core Strategy); and All large villages (67 in total). The Agency notes in the Regulation 18 Notice that the DPD will include proposals and associated policies designed to be in general conformity with the emerging Wiltshire Core Strategy and National Planning Policy Framework (NPPF). The Agency welcomes this and has previously provided comments at various stages of the emerging Core Strategy. We also note your intention to prepare a second DPD (Chippenham Site Allocations DPD) to cover specific matters in the geographic area of the Chippenham Community Area and those parts of the Caine & Corsham Community Areas adjacent to the built-up area of Chippenham. No other DPDs beyond these two are programmed in the most recent edition of your Local Development Scheme. Whilst the Agency is broadly content with the

scope and purpose of the DPD as set out above, it does give rise to the following queries which will need clarification as the DPD is prepared: It is not clear why the settlement boundaries of the three local service centres outside the south Wiltshire HMA (Cricklade, Market Lavington & Pewsey) are not intended to be reviewed; Matters relating to defining settlement boundaries and allocating sites in the five large villages within the Chippenham Community Area would appear to fall within the remit of both this DPD and the CSA DPD and it be useful to make clear as to which of the two will cover the matters. We however, anticipate that proposals coming forward in any of them are unlikely to cause significant impact on the SRN; and There does not appear to be any requirement in the DPD to identify land for non housing development purposes (including, potentially, land for transport infrastructure), even though: the settlement boundary review will presumably need to take account of any land requirements for such uses and include them within the settlement boundary; and the absence of additional DPDs means such allocations would not be covered elsewhere. Transport considerations when identifying allocations

The NPPF explains that one of the twelve core planning principles is to actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focusing significant development in locations which are, or can be, made sustainable. The NPPF also makes it clear that, in plan-making: Developments that generate significant movement should be located where the need to travel will be minimised and the use of sustainable modes of transport can be maximised (para 34); Where practical, developments should be located to have access to high-quality public transport facilities (para 35); and Policies should aim for a balance of land uses in the plan area so that people can be encouraged to minimise journey lengths. The Agency will be looking for evidence that site allocations in the DPD have been chosen on this basis. We have assumed that, in order to be in general conformity with the Core Strategy, the DPD will be identifying non-strategic (i.e. smaller-scale) sites for development. Notwithstanding that assumption, the Agency has set out relevant excerpts of the OfT Circular which relate to plan-making and transport impact below, for information. The policy states that: Development proposals are likely to be acceptable if they can be accommodated within the existing capacity of a section (link or junction) of the SRN or they do not increase demand for use of a section that is already operating at over-capacity levels, taking account of any travel plan, traffic management and/or capacity enhancement measures that may be agreed (para 9); The Highways Agency's prime consideration will be the continued safe operation of its network, even where development proposals would not result in capacity issues (para 10); In framing its contribution to the development of Local Plans, the Highways Agency's aim will be to influence the scale and patterns of development so that it is planned in a manner which will not compromise the fulfilment of the primary purpose of the SRN. (para 14); and Development should be promoted at locations that are or can be made sustainable, that allow for uptake of sustainable transport modes and support wider social and health objectives, and which support existing business sectors, as well as enabling new growth (para 16). The methodology the Agency must use to assess the need for

infrastructure is similarly set out in the OfT Circular. In summary, the Circular states that: Capacity enhancements and infrastructure required to deliver strategic growth should be considered at the Local Plan stage and would not normally be considered as a fresh proposal at the planning application stage (Para 18); Where a potential new capacity need is identified, it will be considered and weighed alongside environmental and deliverability considerations. Additional capacity may be considered in the context of the Highways Agency's forward programme of works, balancing the needs of motorists and other road users with the wider impact on the environment and the local/regional community (para 19); The Agency will work with local authorities and developers to identify opportunities to introduce travel plan and demand management measures through the Local Plan, based on existing and proposed patterns of development, that will support sustainable transport choice and retain capacity within the transport network, so as to provide for further development in future plan periods (para 17); Proposals for the creation of new junctions or direct means of access may be identified and developed at the plan-making stage in circumstances where it can be established that such new infrastructure is essential for the delivery of strategic planned growth (para 39). Other than for serving strategic growth, signed roadside facilities, maintenance compounds and, exceptionally, major transport interchanges, no additional accesses to motorways or other routes of near-motorway standard will be permitted (para 42). The preference will always be that new development should make use of existing junctions; however, the Agency will adopt a graduated and less restrictive approach to the formation or intensification of use of access to the remainder of the SRN. Where a new junction or direct means of access is agreed, the promoter will be expected to secure all necessary consents, and to fund all related design and construction works (para 43); and Modifications to existing junctions will be agreed these do not have an adverse impact on traffic flows and safety (para 42). Transport evidence to support the DPD

As you will be aware, the NPPF explains that LPAs should, ensure that the local plan is based on adequate, up-to-date and relevant evidence. As part of this an assessment should be made of the current quality and capacity of transport infrastructure and its ability to meet forecast demands. This evidence will enable both the LPA and the Agency to satisfy themselves that, in line with the policy in para 182 of the NPPF, that the plan will be found sound by the inspector and that it is positively prepared -the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development; Justified -the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence; Effective -the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and Consistent with national policy -the plan should enable the delivery of sustainable development in accordance with the policies in the [NPPF]'. The Agency notes the existence of relevant transport and accessibility evidence which supports the Core Strategy, or the previous district plans,

either directly or indirectly. This includes: Salisbury Transport Strategy (Atkins, 2012); Salisbury Core Strategy Transport Assessment (MVA, 2008) Wiltshire LDF Strategic Transport Assessment (Wiltshire Council, 2009); Chippenham Transport Strategy (SKM, 2013); and The Agency-commissioned M4 Junction 16 and 17 PARAMICS -Wiltshire & Swindon Core Strategy Assessment Report (JMP, 2012). According to how recently they were published and whether the underlying development assumptions in them remain the same, these may provide useful evidence for the preparation of the DPDs. If they are considered out-of-date then additional evidence is likely to be required. The Agency's involvement in transport evidence is guided by policy in the DfT Circular. Paragraph 15 states that the Agency will work with the local authority to understand the transport implications of development options, including assessing the cumulative and individual impacts of local plan proposals on the ability of the road links and junctions affected to accommodate the forecast traffic flows in terms of capacity and safety. Such assessments should be carried out in line with current DfT guidance or on a basis otherwise agreed with the Agency. In addition to the DfT Circular, the Agency's Spatial Planning Advice Note 09/09 (SPAN) entitled Local Plans: Evaluating Transport Impacts is relevant. It was updated and reissued in January 2014 and it is appended to this letter. The SPAN explains inter alia that the evaluation to be undertaken should: Confirm there is a realistic expectation that the impact of development can be mitigated; Identify the nature and magnitude of any mitigation required; and Provide a basis for comparison between alternative sites. The Agency considers that the most appropriate way forward at this initial stage of plan preparation will be for the LPA to prepare a scope for the evaluation considered necessary to support the DPD. It should then be agreed with both highway authorities before the work is undertaken. The evaluation should take account of policy in the DfT Circular and the SPAN. The Agency is keen to work closely with Wiltshire Council officers and other relevant bodies to ensure the appropriate transport evidence is in place for the DPD so that it can be demonstrated that allocations are viable and deliverable in transport infrastructure terms. The evaluation should be commensurate with the smaller, non-strategic, nature of the proposed allocations. Concluding Remarks Thank you for consulting the Agency in line with the Local Planning Regulations on the scope and content of the proposed DPD, which is intended to set out allocations for housing and define settlement boundaries across much of the authority area. At this initial stage of plan preparation it is the Agency's view that the critical task for the LPA, in liaison with the Agency and other relevant bodies, is to ensure that: Relevant and up-to-date transport evidence is available to support the DPD, with an evaluation undertaken of the both individual and cumulative traffic impacts of proposed allocations; and with Any mitigation measures which are required to serve the allocations having been identified, taking account of government policies on inter alia viability and deliverability. This will enable all relevant bodies to form a definitive view as to the suitability of the allocations and to understand the infrastructure requirements which will arise. The Agency is keen to work constructively and closely with the LPA and other relevant bodies to agree the necessary transport



evidence and prepare the DPD. This will help demonstrate that the duty to cooperate is being met by relevant bodies.

- 73            General -  
              Barford St  
              Martin
- I write as a resident of Barford St Martin who has volunteered to participate in the development of a Village Design Statement leading to a Neighbourhood Plan. We have spent many hours holding public meetings, circulating and collecting questionnaires in order to ensure grass-roots participation and democratic reflection of community wishes. The responses reflected total support for the maintenance of conservation areas, important open spaces, and AONB boundaries. As far as I am aware all the way through the WCC planning briefings that I and other members of the Barford Planning Group attended, we were led to believe that Barford was not earmarked for any housing development other than "In-fill only" and this would be reflected in the Wiltshire Core Plan. We have recently been told that the Core Plan will be more than a year before it is published. To propose production of a Wiltshire Housing Site Allocations Development Plan Document covering Strategic Housing Land Availability Assessment sites, ahead of the Wiltshire Core Plan, and one that will endorse the sacrifice of strategic open land to housing estates, directly undermines this community work. It is, at best, negligent timing, at worst, a direct challenge to the basic tenets of community government. First, I question the purpose to which this particular Wiltshire Housing Site Allocations Development Plan Document will be put. There appears to be a mis-match between the intentions at unitary/county level and those at Communities and Local Government Departmental level as regards the Government's increased housing targets. Whilst the drafting process is quoted as 'just be the normal annual round' in Trowbridge, at Westminster it is regarded as a firm 'deliverable' set to be achieved in 5 years. As Wiltshire has already absorbed a 9% increase in its population in the period 2001-2011, it has grounds to question the wisdom of the Secretary of State for Communities and Local Government's future housing target allocations, quoting his own 2010 policy that unitary/county authorities are to be the final arbiters of "the right level of local housing provision in their area". Second, at the local level there are practical alternatives to the destruction of key green spaces within Wiltshire Council's bailiwick. According to your own publications, in March 2013 there were 116 long-term empty homes recorded in South West Wiltshire. Currently 14% of socially rented housing in Wiltshire is under-occupied. These circumstances offer practical management opportunities without the need for destructive impact on the community and its associated capital cost. In examining the new Wiltshire SHLAA Appendix 3 for Wilton Community Area that will constitute the practical detail behind the proposed DPD, there are 2 sites in Barford St Martin that are worthy of detailed comment: a.Site s1025-Land at St Martins Close. The site proposed next to the London-Exeter railway line is the noise buffer which, in 1949, owing to the prominent height of the embankment, was judged too close to the railway for residential development. In the intervening 75 years trains have greatly increased their average speed and consequent noise and air-displacement. It is advised that any development approvals would have to be restricted to single story, triple-insulated buildings. b.Site S29-Land at Mount



Lane (Front Field). (1) Under the previous Salisbury District Plan this site was designated an Important Open Space. It is used for village social, sporting and charitable events on several occasions each year. It has been designated a 'Community Asset' in the new draft Village Design Statement. (2) Access via either Mount or Short Lanes is restricted; Short Lane is only 10ft wide at its narrow point (alongside the wall of a Grade II\* listed building). Mount Lane is 14ft wide at its east end, where a 90° turn between the walls of two listed properties creates difficulties even for small vehicles. Current access to the site is via a 10ft wide gate opposite a high wall; any widening of access would entail destruction of a hedge-bank in excess of 700 and probably 1,000 years old. (3) The site is in a Conservation Area and abuts the curtilages of four listed buildings. Any building would seriously impair the view of three of them. It is one of only two open areas in the Parish that has never been dressed with agricultural chemicals and not been ploughed within living memory. It is a haven for glow-worms (*Lampyrus noctiluca*) and a vital linking site for the springtime passage of mating European toads (*Bufo bufo*) to the dew-pond bordering the southern edge of the site. (4) The site is not in single ownership. (5) Should the site ever suffer development, the proposed density at 11 properties is unacceptably high. The draft Village Design Statement calls for infill to be of no greater density than the remainder of the Conservation Area, from which 3 houses would be the proportional allocation. (Comment: I was particularly puzzled to compare this proposed density with the 21 houses proposed for the former UK Land Command site S250, a brown-field site of over 9 hectares). In conclusion, I am concerned at the consequences of the unfortunate timing of the proposed new Housing Site Allocation Development Plan Document and revision of its subsidiary SHLAA lists. To the residents of Barford St Martin it appears to directly undermine the Neighbourhood Planning Process. The chance discovery of this action, just 6 days prior to the closure of its comment period, leads me to question both the wisdom and the timing of this process.

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General -  
Barford St  
Martin

I wish to object to the possible development of the land on Mount Lane, Barford St Martin, for future residential use, for the following reasons: 1) This area of Barford St Martin is particularly attractive, with thatched cottages and Grade 2 listed properties. A modern development, however sympathetically done, cannot help but detract from the unique character and appearance of this part of the village. 2) Development here would rob the village of valuable amenity space. Village events are frequently held here (with full consent of the owners). Over the last 12 months these have included a dance, quiz night, village cream tea and our annual summer fete, which raise money for upkeep of the village and community projects, as well being vital in maintaining the vibrancy and sense of community in our village. 3) The open aspect of the neighbourhood is a particular defining feature of this area of Barford St Martin, and any development in this area would completely destroy this characteristic. 4) The adverse effect of the development on the setting of listed buildings, including The Old Cottage and Barford House on Mount Lane. 5) The loss of existing views from neighbouring properties would adversely affect the residential

amenity of neighbouring owners. These neighbouring properties include, but are not limited to Barford House, Mount Cottage, The Old Cottage, Primrose Cottage and Deerhayes. 5) The proposed density of the site at 11 properties is unacceptably high. The proposed development would be completely out of keeping compared with existing development in the vicinity, which consists entirely of three and four bedroom character detached properties. 6) Mount Lane and Short Lane are narrow single carriageway country lanes; there is substantial concern regarding access and road capacity should a development go ahead. It should also be noted that the land on Mount Lane is under multiple ownership, not single ownership as stated on your plans. As we believe the site is unsuitable for any future development for the above reasons, we would like to request that the site is deleted from any future council housing proposals. The residents of Barford St Martin are actively working on a Village Design Statement / Neighbourhood Plan to help with future planning. This is a long and time consuming piece of work which has been underway since October 2012. The plan specifically acknowledges that Barford is not ear-marked for development and it will only support appropriate in-fill development. Nowhere on our Plans do we foresee developing on the land on Mount Lane which we see as essential to our neighbourhood for the aforementioned reasons. I do hope our Plans will be taken into consideration when considering such future developments.

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|----|-----------------------|--|
| 75 | All Cannings          | See attached SHLAA submission for Bridge House Paddock, All Cannings.  |
| 76 | Melksham              | Amendment to a SHLAA proforma - I have looked at the list of sites put forward for future development in Melksham on the website and noticed that the land that I co- own with other members of my family, namely site 715 Woodrow House Farm is listed as "not available at present as in multiple or unknown ownership" we put the land forward for consideration some years ago and it is available and I can give you details of all the owners if needed. Please can you amend the details of this site to reflect the true status and I let me know when this has been done . Below is the address I found it on.<br><a href="http://www.wiltshire.gov.uk/planning-shlaa-2011-dec-appendix-3-melksham.pdf">www.wiltshire.gov.uk/planning-shlaa-2011-dec-appendix-3-melksham.pdf</a> - 22 December 2011 See attachment for amendment. |
| 77 | Devizes               | See attached SHLAA submission for Dunkirk Hill, Devizes.   |
| 78 | Broadchalke           | See attached SHLAA submission for land at Bury Lane.   |
| 79 | Newtown,<br>Salisbury | See attached SHLAA submission for land at Newtown, Salisbury.  |

80	Coombe Bissett, Salisbury	See attached SHLAA submission for land at Coombe Bissett, Salisbury.
81	Harnham	See attached SHLAA submission for land at Harnham.
82	Salisbury	See attached submission for land at Manor Farm, Salisbury.
83	Westbury	See attached SHLAA submission for land at Slag Lane, Westbury.
84	General - Barford St Martin	I have just found out that you have plans to develop land at Mount Lane, Barford St Martin. I sincerely hope that this does not happen. The only access to this site is via Mount Lane or Short Lane. These are very narrow country lanes which I do not think could take any additional traffic. This field is often used for community events, with the full agreement of the present owners. It would be a shame to lose this facility in a village which is already short of community amenities. Development of this area would change the character of the village. This central area of the village has thatched cottages and listed buildings. No modern development, no matter how sympathetic, could fit in this space without ruining the visual aspect of the area. 11 houses on the site is far too many. Please think again about this site.
85	Tisbury	Please accept the following comments from Tisbury Parish Councillors. P.Cnllrs discussed the issues of potential housing units on each of the following sites in the Tisbury area: Site S68 - Land opposite The Avenue, Tisbury Site S75 “ Land at The Station Works, Tisbury Site 3171 “ Land north of Vicarage Road The density of proposed housing, along with issues such as highway access and characteristics of the local environs were not felt to be ideal at any site. P.Cnllrs did however resolve, in the awareness of the current expected obligations in terms of additional housing units, to: i. request the removal of site S68 “ The Avenue, from the site allocation listing altogether. ii. support the inclusion of site S75 “ Land at The Station Works, with a mix of housing (recognizing the demographic age profile) and commercial/light industrial use, but not a retail zone; recognition of the need for parking for the railway station and also proper access to the village should also be a requisite. iii. the land north of Vicarage Road, site S3171 - was felt to be a site requiring a lower density of housing units than that projected, especially as access to the highway was likely to be an issue. However, P.Cnllrs did eventually resolve to support the inclusion of this site providing that the housing density was reduced.

- 86            Salisbury            Salisbury City Councils Planning and Transport Committee would like to submit the following comments in relation to the current Wiltshire Housing Site Allocations DPD consultation: Ensure that the settlement boundary review for Salisbury takes account of the strategic sites for the city already allocated or underway, currently many of which are wholly or partly outside the city boundaries. Note that the disaggregation currently proposed does not include further housing in Salisbury City/Wilton Town above the levels in the adopted South Wiltshire Core Strategy, but note too that Salisbury acts as a service centre for South Wiltshire and that any increase in housing in the South Wiltshire area will substantially compound traffic and air quality problems in and around the city. The DPD therefore needs to consider these issues and how they can be addressed.
- 87            General                Please find attached a letter providing our comments on the Wiltshire Council Site Allocations Development Plan Document - Scoping Consultation on behalf of Hallam Land Management. [below]

We recently received notification that the Council is consulting upon the scope of the Wiltshire Housing Site Allocations Development Plan Document (DPD). This letter provides our observations and comments on behalf of Hallam Land Management.

Overall we support the general approach proposed including the review of the settlement boundaries and the allocation of land for development. There are a number of settlements within Wiltshire which require substantial allocations to support the delivery of the scale of development envisaged through the emerging Core Strategy. Of particular note is the town of Melksham where there is a residual requirement to deliver 752 dwellings during the plan period yet no strategic allocations in the Core Strategy and only very limited urban capacity identified in the SHLAA. In Melksham, and other similar settlements, it is therefore essential for the Council to proactively identify suitable allocations and to work with landowners to bring these forward in order to deliver the identified scale of housing within the plan period.

In so doing, the Site Allocations DPD must consider all available options in the context of the NPPF. As part of the options assessment, significant weight should be attached to the sustainability credentials and infrastructure delivery potential of large

strategic sites. In contrast to smaller sites, larger developments are often able to meet their infrastructure needs (such as open space etc) on site and support the delivery of affordable housing. These benefits are recognised in paragraph 52 of the NPPF which states that

"The supply of new homes can sometimes be best achieved through planning for larger scale development, such as new settlements or extensions to existing villages and towns that follow the principles of Garden Cities."

With regards the identification of the options, we note that the Council propose to use the SHLAA as the principal background evidence. This provides a reasonable starting point, however, in identifying the options, the Council also has a wealth of background information available which was produced to support previous versions of the emerging Core Strategy.

We draw particular attention again to the settlement of Melksham, where the Preferred Option version of the Core Strategy, following rounds of public consultation, identified land to the east of Melksham as the preferred option for an urban extension to the town. Indeed the Sustainability Appraisal scored this option higher than the strategy of 'no strategic allocation' which the Council chose to progress. The information and public input in relation to Melksham and other settlements which had previously been produced by the Council could usefully be taken forward through the Site Allocations DPD and supplement the SHLAA in the identification of land for residential and commercial development.

There are other community areas within Wiltshire where the main settlement does benefit from the allocation of a strategic site through the emerging Core Strategy. Where this is the case, this should not preclude the potential allocation of further substantial areas of land for development, where the requirement exists and these options are demonstrated to be the most sustainable means of delivering the required scale of housing. Warminster is one example of such a settlement 'where the strategic allocation to the west of Warminster might provide a large proportion of the future housing needs of the town, yet

further land is nevertheless required within the community area to meet the residual needs.

The DPD also offers an opportunity for sites to be considered that offer different benefits to a town to the strategic allocations. It is important that where a town has a strategic allocation proposed, residual numbers are simply not 'added onto' the strategic allocations. A thorough process is needed to ensure a good spatial spread across a town where there are suitable sites available.

Our final comment on the scope of the Site Allocations DPD relates to the scale of housing land identified at each of the settlements. The primary purpose of the Site Allocations DPD is to identify the land needed to ensure the delivery of the strategic housing requirement. In this regard, we note that the 42,000 dwelling housing requirement in the emerging Core Strategy is very clearly identified as a minimum "at least" figure. Where there is potential to allocate more land for development, and in so doing to secure social and economic sustainability benefits, the Council should seek to take these opportunities and not instead interpret the housing requirement to be a cap on development.

Furthermore, the NPPF at paragraph 14 endorses flexibility in plan-making stating that:

"For plan-making this means that: ... Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change." [our emphasis]

This principle is applicable to all development plan documents including the Site Allocations DPD. It is our view that, to accord with the NPPF, the site Allocations DPD should allocate additional land, over and above the total anticipated to be needed to support the delivery of 42,000 dwellings. This would provide flexibility and increase certainty over housing delivery. A 10% 20%

allowance for each of the community areas would represent a reasonable starting point.

We trust the comments provided in this letter are helpful in establishing the scope for the Site Allocations DPD. If you require any further information or clarification, please do not hesitate to contact me.

88

General

WILTSHIRE HOUSING SITE ALLOCATIONS DPD Thank you for your email dated 20 March 2014, which is seeking representation on the proposed scope of the Wiltshire Housing Site Allocations Development Plan Document (DPD). At this stage our comments are fairly generic, but we would welcome more detailed discussion with you as your assessment of sites progresses. Our comments are provided below. Climate change As you are probably aware, paragraph 99 of the National Planning Policy Framework (NPPF) states that Local Plans should take account of climate change over the longer term, including factors such as flood risk, coastal change, water supply and changes to biodiversity and landscape. New development should be planned to avoid increased vulnerability to the range of impacts arising from climate change. When new development is brought forward in areas which are vulnerable, care should be taken to ensure that risks can be managed through suitable adaptation measures, including through the planning of green infrastructure. Flood Risk The NPPF (paragraph 100) states that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk, but where development is necessary, making it safe without increasing flood risk elsewhere. Local Plans should be supported by Strategic Flood Risk Assessment and develop policies to manage flood risk from all sources, taking account of advice from the Environment Agency and other relevant flood risk management bodies, such as lead local flood authorities and internal drainage boards. Local Plans should apply a sequential, risk-based approach to the location of development to avoid where possible flood risk to people and property and manage any residual risk, taking account of the impacts of climate change, by: applying the Sequential Test; if necessary, applying the Exception Test; safeguarding land from development that is required for current and future flood management; using opportunities offered by new development to reduce the causes and impacts of flooding; and where climate change is expected to increase flood risk so that some existing development may not be sustainable in the long-term, seeking opportunities to facilitate the relocation of development, including housing, to more sustainable locations. The aim of the Sequential Test is to steer new development to areas with the lowest probability of flooding. Development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower probability of flooding. The Strategic Flood Risk Assessment will provide the basis for applying this test. A sequential approach should be used in areas known to be at risk from any form of flooding. If, following

application of the Sequential Test, it is not possible, consistent with wider sustainability objectives, for the development to be located in zones with a lower probability of flooding, the Exception Test can be applied if appropriate. For the Exception Test to be passed: it must be demonstrated that the development provides wider sustainability benefits to the community that outweigh flood risk, informed by a Strategic Flood Risk Assessment where one has been prepared; and a site-specific flood risk assessment must demonstrate that the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall. Both elements of the test will have to be passed for development to be allocated or permitted.

**Sustainable Drainage Systems** When considering potential sites for allocation, adequate space must be made available for Sustainable Drainage Systems (SuDS) to be incorporated. Using SuDS has the benefit of not only disposing of surface water effectively and managing flood risk, but also has the potential to improve water quality, create wildlife habitat and amenity areas.

**Groundwater protection** Assessment of proposed housing site allocations must consider the potential impact on groundwater quality and quantity. This is to ensure that the many groundwater water supplies that are in Wiltshire would be protected. We apply a general level of protection for all drinking water sources through the use of source protection zones (SPZs). SPZs are used to identify those areas close to drinking water sources where the risk associated with groundwater contamination is greatest. Our groundwater Source Protection Zone maps, which have previously been provided to your council, should be referred to as part of your assessment of sites. Please also refer to our Groundwater Protection: Principles and Practice (GP3) document for further information.

<https://www.gov.uk/government/publications/groundwater-protection-principles-and-practice-gp3>

**Water supply and waste water capacity** When considering sites the water supply and waste water capacity must be assessed. The local water company should be contacted to determine this. All proposed allocations must be able to connect to a mains foul sewer. Any required improvements to water supply and waste water infrastructure systems must be identified at the site allocation stage.

**Potential contamination** The previous use of sites must be reviewed and consideration of any potential contamination identified. Further site risk assessment may be needed, which would outline any required remediation.

**Water framework directive** Water Framework Directive requirements would need to be considered when assessing sites. This should include identifying any specific River Basin Management Plans (RBMPs) measures that are relevant to Wiltshire. The South West RBMP is the main plan for you to consider. This covers the majority of Wiltshire, but there are some small areas that are covered by other RBMPs. More information on RBMPs can be found on the Gov.uk website - <https://www.gov.uk/government/collections/river-basin-management-plans>

**Green infrastructure** Green space should be incorporated into the design of any housing sites to ensure that enhancement of biodiversity in the area can be achieved, along with the other benefits that green space brings.

**Nature conservation** Any existing water features within potential sites should be protected and enhanced where possible. Ecological



surveys would be required to establish the species and habitat present. Waste management Your assessment should determine whether there are sufficient waste management facilities available to serve the proposed allocation site. We would like to continue to be involved in the development of this DPD. Please contact me if you have any queries, or if you would like any further information relating to the points raised above.

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| 89 | General    | Scope and Content of the Draft Wiltshire HSA DPD With reference to the above document I believe that any housing allocations in rural areas must take account of the scale and character of the existing developments. This is particularly the case where rural hamlets and villages of differing and distinct characters have been grouped together and re-defined as large villages through the core strategy process for planning purposes. In such cases, the scope for additional development must address and respect the scale and character of the individual hamlet or village, and the impact of any of their natural boundaries.   |
| 90 | General    | Scope and Content of the Draft Wiltshire HSA DPD As part of the HSA DPD, I understand that settlement boundaries will be reviewed. However there appears to be an inconsistency between Core policy 1, 4.13 and 4.15 relative to the way in which the settlement boundary will be reviewed: Para 4.13: These settlement boundaries will be reviewed as part of the Wiltshire Housing Site Allocations and Chippenham Site Allocations DPDs, as set out in the Council's Local Development Scheme, in order to ensure they are up to date and can adequately reflect changes which have happened since they were first established. Para 4.15 "These settlement boundaries will also be reviewed as part of the Housing Site Allocations DPD as set out in the Council's Local Development Scheme, in order to ensure they remain up to date and properly reflect building that has happened since they were first established." We urge you to clarify than in the HSA process the definition used in 4.15 is adopted, and that physical changes only are used in the boundary review - rather than the policy change to define two previously physically separated areas as one. Furthermore, I believe that any housing allocations in rural areas must take account of the scale and character of the existing developments. This is particularly the case where rural hamlets and villages of differing and distinct characters have been grouped together and re-defined as large villages' through the core strategy process for planning purposes. In such cases, the scope for additional development must address and respect the scale and character of the individual hamlet or village, and the impact of any of their natural boundaries. |
| 91 | Westbury   | Please find attached.  |
| 92 | Trowbridge | Re: Call for Sites This letter comprises a noter on behalf of Persimmon Homes Wessex (PHW)1 in response to the Council's 'Call for Sites' process. PHW controls Land at Biss Farmr Trowbridge. Within Wiltshire Core Strategy Pre-Submission Document  |

(tracked Changes Version/ April 2014) Trowbridge is identified as a Principal Settlement within Trowbridge Community Area. Development in the Community Area is based on a settlement hierarchy which constitutes settlements depending on the level of services and local facilities available. For the Community Area the Settlement Hierarchy is as follows: Principal Settlement: Trowbridge Large Villages: Hilpertonn North Bradley and Southwick. Small Villages: West Ashton and Yarnbrook. The scale of development proposed for the Community Area is shown below: Area Requirement 2006-2026 Trowbridge Town 6/810 Remainder 165 Community Area Total 6/975 Taking into account Completions and sites with Planning Permission (2006-2014) the remaining requirement for the Trowbridge Community Area is as follows: Area Remaining Requirement 2006 2026 Trowbridge Town Remainder 1/476 -69 Community Area Total 1,406 Future development proposals for Land at Biss Farm are consistent with the Settlement Strategy for the Trowbridge Community Area and will make an important contribution to meet the identified housing requirement. In any case, PHW considers that a comprehensive review of the existing settlement boundaries through the Housing Site Allocations DPD should be undertaken to enable the delivery of sustainable development throughout the Plan Period. The comprehensive review should be undertaken irrespective of overall housing provision as the above housing requirements for the Community Area are 'indicative' minimum figures. Additional housing at Trowbridge will help sustain and enhance the Town's services and facilities which will in turn help to promote better levels of self containment and a viable sustainable community. The site is located to the South East of Trowbridge and comprises approximately 13 hectares of relatively level land. This land has an existing Planning Permission for employment, however, very limited interest has been received since it was marketed in April 2013. PHW believes that residential development would be more suited within this location. The land uses surrounding Biss Farm are predominately residential. Land to the South of the site has a draft allocation within the emerging Core Strategy for 2,600 dwellings; Land at Biss Farm should form part of this allocation for residential development. For additional information, please see attached Call for Sites Submission Form and Location Plan. It is considered that this site could deliver approximately 300 dwellings within the SHLAA's initial 5 year period. Future residential development within this location would positively contribute to its locality and produce local housing that will go some way in sustaining the vitality of the Town. We hope that the above and attached information clearly outlines our interest and provides sufficient information to inform the 'Call for Sites' process. Should you require any further information then please do not hesitate to contact me.

93

Pewsey

Please find attached Call for Sites submission documents - Black Mikes, Pewsey. Re: Call for Sites. This letter comprises a note, on behalf of Persimmon Homes Wessex (PHW), in response to the Council's 'Call for Sites' process. PHW controls land at Black Mikes, Pewsey, north of Astley Close, extending to approximately 1.8 hectares. Within Wiltshire Core Strategy Pre-Submission

Document (tracked Changes Version, April 2014), Pewsey is identified as a Local Service Centre in Pewsey Community Area. The Pewsey Community Area is predominantly rural in character, with the main settlement being Pewsey. Development in the Community Area is based on a settlement hierarchy which constitutes settlements depending on the level of services and local facilities available. For the Community Area the Settlement Hierarchy is as follows; Local Service Centre: Pewsey Large Villages: Burbage, Great Bedwyn, Shalbourne and Upavon. Small Villages: Alton Priors/Alton Barnes, Charlton St Peter, Chirton, East Grafton, Easton Royal, Ham, Hilcott, Little Bedwyn, Manningford Bruce, Marden, Milton, Lilbourne, Oare, Rushall, Stanton St Bernard, Wilcot, Woodborough and Wootton Rivers. The scale of development proposed for the Community Area is shown below; Area Requirement 2006-2026 Community Area Total 600 Pewsey being the highest tier settlement is best suited to accommodate a reasonable proportion of the 600 dwellings identified. Taking into account Completions and sites with Planning Permission (2006-2014) the remaining requirement for the Pewsey Community Area is as follows; Area Remaining Requirement 2006-2026 Community Area Total 189 Future development proposals for Pewsey are consistent with the Settlement Strategy and will make an important contribution to meet the identified housing requirements for the Community Area. In any case, PHW considers that a comprehensive review of the existing settlement boundaries through the Housing Site Allocations DPD should be undertaken to enable the delivery of sustainable development throughout the Plan Period. The comprehensive review should be undertaken irrespective of overall housing provision as the above housing requirements for the Community Area are 'indicative' minimum figures. A large proportion of Wiltshire's population live in the rural areas, additional housing within these areas is critical to ensure that local needs are met and that the vitality of rural communities are sustained. Paragraph 55 of the National Planning Policy Framework states that "to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities". Additional housing at Pewsey will help sustain and enhance the settlement's services and facilities, which in turn will help to promote better levels of self containment and a viable sustainable community. The site extends to approximately 1.8 hectares of level green field land and lies to the North West of Pewsey. The site itself is well enclosed; the western boundary is formed by Hollybush lane, an established existing development of bungalows to the South, hedgerow and a large residential dwelling to the North and a line of trees and bushes to the East. The site is to be accessed via Astley Close. The site is within the Wessex AONB, as is the whole of Pewsey. Due to the site's enclosed nature there are no long distant views into the countryside. It is considered that future development on this site would not cause any significant harm to the aim of conserving and enhancing the AONB's landscape or natural beauty. The site is currently outside but abuts the development limits of the settlement; there is no policy restriction/designation on the site, other than being within the AONB. It is considered that a well designed development having regard to its location and landscape containment, which is commensurate to the scale of Pewsey, could be accommodated

without detriment to the setting of the settlement. It is considered that the location of the site is sustainable. The main hub of the settlement is centred along High Street and North Street where a number of local amenities exist, such as a pharmacy and Co-Operative Food Store; this is approximately 500 metres from the site. For additional information please see attached Call for Sites Submission Form, Location Plan and previous SHLAA Form. This site was included within Wiltshire's previous SHLAA (Land at Black Mikes, Pewsey ref 1300). It is considered that this site could deliver approximately 60 dwellings within the SHLAA's initial 5 year period, development within this location would positively contribute to its locality and produce local housing that will go some way in sustaining the vitality of Pewsey. We hope that the above and attached information clearly outlines our interest and provides sufficient information to inform the 'Call for Site's process. Should you require any further information then please do not hesitate to contact me.

- 94 Christian Malford Re: Call for Sites Please find attached SHLAA Submission Forms and Plans for the following sites: Land at Station Road, Christian Malford. I hope that the attached information clearly outlines our interest and provides sufficient information to inform the 'Call for Site's process. Should you require any further information then please do not hesitate to contact me.
- 95 Melksham Re: Call for Sites Please find attached SHLAA Submission Forms and Plans for the following sites: Land at 398a Spa Road, Melksham I hope that the attached information clearly outlines our interest and provides sufficient information to inform the 'Call for Site's process. Should you require any further information then please do not hesitate to contact me.
- 96 Westbury Re: Call for Sites This letter comprises a note, on behalf of Persimmon Homes Wessex (PHW), in response to the Council's 'Call for Sites' process. PHW controls land at Fairdown Avenue, Westbury. Within Wiltshire Core Strategy Pre-Submission Document (tracked Changes Version, April 2014) Westbury is identified as a Market Town within Westbury Community Area. Development in the Community Area is based on a settlement hierarchy which constitutes settlements depending on the level of services and local facilities available. For the Community Area the Settlement Hierarchy is as follows: Market Towns: Westbury Large Villages: Oilton Marsh and Bratton. Small Villages: Edington/Tinhead . The scale of development proposed for the Community Area is shown below: Area Requirement 2006-2026 Westbury Town 1,500 Remainder 115 Community Area Total 1,615 Taking into account Completions and sites with Planning Permission (2006-2014) the remaining requirement for the Westbury Community Area is as follows: Area Remaining Requirement 2006 2026 Westbury Town 203 Remainder 571 Community Area Total Future development proposals for Westbury are consistent with the Settlement Strategy for the Westbury Community Area and will make an important contribution to meet the identified housing requirements for Westbury Town. In any case, PHW considers that a comprehensive review of the existing settlement boundaries through the Housing Site Allocations DPD

should be undertaken to enable the delivery of sustainable development throughout the Plan Period. The comprehensive review should be undertaken irrespective of overall housing provision as the above housing requirements for the Community Area are 'indicative' minimum figures. Additional housing at Westbury will help sustain and enhance the Town's services and facilities which will in turn help to promote better levels of self containment and a viable sustainable community. It is important to note that PHW submitted a Planning Application in December 2012 (Ref: 12/02323/OUT) which was subsequently refused in March 2013. An Appeal was then lodged and dismissed in August 2013. The Inspector clearly recognised that the site was sustainable in terms of its location and stated "the site is well located for walking and cycling to the Town Centre". Despite the site's suitability credentials, the Appeal was dismissed on the grounds that the Council could demonstrate a 5 year supply of housing land. However, it should be noted that the Inspector based his conclusions on the housing requirement of 37,000, not 42,000. Since the Appeal Decision, Wiltshire Council have resolved to grant Planning Permission, subject to the completion of a S106, in March 2014 for 220 units at the Mead, Westbury. The Officer's Report stated that "the Town policy limits have been found by the Core Strategy Inspector to be out of date, bringing into play national policy in the NPPF that states that Planning Permission should be granted, unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits (NPPF paragraph 14). The issue of the 5 year land supply is less clear cut... compared to the 5.25 required. The Inspector has yet to confirm whether he agrees with this and the margin is thin". The site is located on the North Eastern edge of Westbury and comprises approximately 1.8 acres of relatively flat green field land. The site itself is well enclosed; it is bordered on two sides by an existing housing estate, which forms the built up edge of the Town. A third side is adjacent to a cemetery extension; the fourth side is bordered by a hedgerow with countryside beyond. The site is to be accessed through the existing estate, Fairdown Avenue. For additional information, please see attached Call for Sites Submission Form. This site was included within Wiltshire's previous SHLAA (Land at Fairdown Avenue, Ref: 272). It is considered that this site could deliver 29 dwellings within the SHLAA's initial 5 year period, development within this location would positively contribute to its locality and produce local housing that will go some way in sustaining the vitality of the Town. We hope that the above and attached information clearly outlines our interest and provides sufficient information to inform the 'Call for Sites' process. Should you require any further information then please do not hesitate to contact me.

- 97            Trowbridge    Re: Call for Sites This letter comprises a note on behalf of Persimmon Homes Wessex (PHW)<sup>1</sup> in response to the Council's 'Call for Sites' process. PHW controls Land at Biss Farm Trowbridge. Within Wiltshire Core Strategy Pre-Submission Document (tracked Changes Version/ April 2014) Trowbridge is identified as a Principal Settlement within Trowbridge Community Area. Development in the Community Area is based on a settlement hierarchy which constitutes settlements depending on the level

of services and local facilities available. For the Community Area the Settlement Hierarchy is as follows: Principal Settlement: Trowbridge Large Villages: Hilperton North Bradley and Southwick. Small Villages: West Ashton and Yarnbrook. The scale of development proposed for the Community Area is shown below: Area Requirement 2006-2026 Trowbridge Town 6/810 Remainder 165 Community Area Total 6/975 Taking into account Completions and sites with Planning Permission (2006-2014) the remaining requirement for the Trowbridge Community Area is as follows: Area Remaining Requirement 2006 2026 Trowbridge Town Remainder 1/476 -69 Community Area Total 1,406 Future development proposals for Land at Biss Farm are consistent with the Settlement Strategy for the Trowbridge Community Area and will make an important contribution to meet the identified housing requirement. In any case, PHW considers that a comprehensive review of the existing settlement boundaries through the Housing Site Allocations DPD should be undertaken to enable the delivery of sustainable development throughout the Plan Period. The comprehensive review should be undertaken irrespective of overall housing provision as the above housing requirements for the Community Area are 'indicative' minimum figures. Additional housing at Trowbridge will help sustain and enhance the Town's services and facilities which will in turn help to promote better levels of self containment and a viable sustainable community. The site is located to the South East of Trowbridge and comprises approximately 13 hectares of relatively level land. This land has an existing Planning Permission for employment, however, very limited interest has been received since it was marketed in April 2013. PHW believes that residential development would be more suited within this location. The land uses surrounding Biss Farm are predominately residential. Land to the South of the site has a draft allocation within the emerging Core Strategy for 2,600 dwellings; Land at Biss Farm should form part of this allocation for residential development. For additional information, please see attached Call for Sites Submission Form and Location Plan. It is considered that this site could deliver approximately 300 dwellings within the SHLAA's initial 5 year period. Future residential development within this location would positively contribute to its locality and produce local housing that will go some way in sustaining the vitality of the Town. We hope that the above and attached information clearly outlines our interest and provides sufficient information to inform the 'Call for Sites' process. Should you require any further information then please do not hesitate to contact me.

98            Beanacre            Following our last conversation please find attached a completed "Call for Sites" form re the above. An OS plan is also attached. I have copied this email to the spatial planning email address as well because of the letter we received dated 20th March from Alistair Cunningham which covered the New Wiltshire Housing Site Allocations DPD Document as well as the Call for Sites. I am not sure whether my representation has any relevance to that Consultation which has a timescale for representations of 5th

May etc. So it is included for them just in case! Please could you acknowledge receipt?

99 Corsham Comments on the Wiltshire Housing Site Allocations Development Plan Documents (DPD). I am writing on behalf of GolDev who hold an interest in land in Corsham, and am providing comment on the scope of the DPD along with a completed call for sites form. GolDev have received verbal advice from officers at Wiltshire District Council that the site may be appropriate for an application during the course of this year, however, this position is being considered and therefore if the site can be considered through the call for sites we would be grateful. I have reviewed the scope for the document as set out on the Councils website, and I have set it out below for ease of reference. The scope of this document is proposed to cover two key matters. Its primary role is to support the delivery of housing growth set out within the emerging Wiltshire Core Strategy. The document will identify sufficient land (in the form of sites) across Wiltshire to provide surety of housing delivery over the plan period to 2026. In addition to identifying sites for housing delivery, the document will review settlement boundaries, as defined in the emerging Wiltshire Core Strategy in relation to: the Principal Settlements of Salisbury and Trowbridge; Market Towns; Local Service Centres in the South Wiltshire Housing Market Area; and Large Villages. The plan will present proposals and associated policies designed to be in general conformity with the emerging Wiltshire Core Strategy and National Planning Policy Framework. It will consider sites in relation to the geographic area of Wiltshire, but excluding Chippenham. Growth at Chippenham is to be dealt with as a separate DPD. This Development Plan Document above all other requirements, needs to ensure that it meets with the NPPF's four tests of soundness. These tests ensure that the plans are positively prepared by being based on a strategy that seeks to meet objectively assess development and infrastructure requirements. The plan must be justified to ensure that it is the most appropriate strategy based on proportionate evidence. The plan must be effective in delivering development over its period and based on cross boundary strategic priorities and the plan must be consistent with national policies in ensuring the delivery of sustainable development. In summary, the National Planning Policy Framework establishes the following planning principles relevant to the consideration of the preparation of this development plan document. There is a presumption in favour of sustainable development; This presumption should be applied where local plan policies are out of date; Local planning authorities are required to plan to meet the full objectively assessed need for housing; Local planning authorities need to maintain a five year land supply of deliverable sites with an additional 5% buffer, or 20% where there is a persistent under delivery; Existing local plan policies can be used in decision making only where they remain up to date and consistent with the NPPF; The NPPF establishes a clear cost-benefit approach to the assessment of sustainable development. This cost-benefit approach should therefore be clearly present in Local Plan policies (including those adopted prior to the NPPF) for them to be considered to be in conformity with the NPPF, and continue to be given due weight in decision making; Emerging local plan



policies can be afforded some weight, depending on the stage of plan preparation and level of objection. In regards to the relevant components of the emerging Core Strategy, Draft Core Policy 2 proposes the Delivery Strategy for Wiltshire. This includes planning for the delivery of a housing target of 37,000 homes for the period 2006 to 2026. This is significantly below the level of housing considered appropriate in the dRSS and has attracted significant objection in the hearing sessions to date, and therefore the DPD needs to address this short fall and ensure that the Council are working towards an acceptable housing target. Finally, Draft Core Policy 61 promotes the location of development in sustainable locations to reduce the need to travel and encourage the use of sustainable transport. Wiltshire Council has identified Corsham as a Market Town, and as such it is a settlement of sufficient size that is well provided with local amenities and is a sustainable location to provide further housing. It is requested that particular regard is given to the development capacity of Corsham and its current settlement boundary. Thank you for allowing me the time to comment upon the scope for this document.

- 100      Trowbridge      Re: Call for Sites This letter comprises a note, on behalf of Persimmon Homes Wessex (PHW), in response to the Council's 'Call for Sites' process. PHW controls land South of Green Lane, Trowbridge. Within Wiltshire Core Strategy Pre-Submission Document (tracked Changes Version, April 2014) Trowbridge is identified as a Principal Settlement within Trowbridge Community Area. Development in the Community Area is based on a settlement hierarchy which constitutes settlements depending on the level of services and local facilities available. For the Community Area the Settlement Hierarchy is as follows: Principal Settlement: Trowbridge Large Villages: Hilperton, North Bradley and Southwick. Small Villages: West Ashton and Yarnbrook. The scale of development proposed for the Community Area is shown below: Area Requirement 2006-2026 Trowbridge Town 6,810 Remainder 165 Community Area Total 6,975 Taking into account Completions and sites with Planning Permission (2006-2014) the remaining requirement for the Trowbridge Community Area is as follows: Future development proposals for Land South of Green Lane are consistent with the Settlement Strategy for the Trowbridge Community Area and will make an important contribution to meet the identified housing requirement. In any case, PHW considers that a comprehensive review of the existing settlement boundaries through the Housing Site Allocations DPD should be undertaken to enable the delivery of sustainable development throughout the Plan Period. The comprehensive review should be undertaken irrespective of overall housing provision as the above housing requirements for the Community Area are 'indicative' minimum figures. Additional housing at Trowbridge will help sustain and enhance the Town's services and facilities which will in turn help to promote better levels of self containment and a viable sustainable community. The site is located to the East of Trowbridge and comprises approximately 7.5 hectares of relatively level land. This land sits to the East of PHW's development which is currently under construction. The location of the site is sustainable, given that there are two Residential Allocations which



adjoin the site on the Northern and Western boundaries. The site can be accessed through PHW's adjacent site. For additional information, please see attached Call for Sites Submission Form and Location Plan. The site was included within the previous SHLAA, Ref: 256. It is considered that this site could deliver approximately 240 dwellings within the SHLAA's initial 5 year period. Future residential development within this location would positively contribute to its locality and produce local housing that will go some way in sustaining the vitality of the Town. We hope that the above and attached information clearly outlines our interest and provides sufficient information to inform the 'Call for Sites' process. Should you require any further information then please do not hesitate to contact me.

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| 101 | Burbage | With reference to the SHLAA I submit herewith a site for consideration for a housing scheme in Burbage.  |
| 102 | Mere    | <p>Re: Call for Sites. This letter comprises a note, on behalf of Persimmon Homes Wessex (PHW), in response to the Council's 'Call for Sites' process. PHW controls land at Castle Street, Mere. Within Wiltshire Core Strategy Pre-Submission Document (tracked Changes Version, April 2014), Mere is identified as a Local Service Centre in Mere Community Area. The Mere Community Area is predominantly rural in character, with the main settlement being Mere. Development in the Community Area is based on a settlement hierarchy which constitutes settlements depending on the level of services and local facilities available. For the Community Area the Settlement Hierarchy is as follows; Local Service Centre: Mere Small Villages: East Knoyle, Kilmington, Semley/Semley Station, Stourton and Zeals. The scale of development proposed for the Community Area is shown below; Area Requirement 2006-2026 Mere 235 Remainder 50 Community Area Total 285 Mere being the highest tier settlement is best suited to accommodate a reasonable proportion of the 235 dwellings identified. Taking into account completions and sites with planning permission (2006-2014) the remaining requirement for the Mere Community Area is as follows; Area Remaining Requirement 2006-2026 Mere 111 Remainder 11 Community Area Total 122 Future development proposals for Mere are consistent with the Settlement Strategy and will make an important contribution to meet the identified housing requirements for the Community Area. In any case, PHW considers that a comprehensive review of the existing settlement boundaries through the Housing Site Allocations DPD should be undertaken to enable the delivery of sustainable development throughout the Plan Period. The comprehensive review should be undertaken irrespective of overall housing provision as the above housing requirements for the Community Area are 'indicative' minimum figures. A large proportion of Wiltshire's population live in the rural areas, additional housing within these areas is critical to ensure that local needs are met and that the vitality of rural communities are sustained. Paragraph 55 of the National Planning Policy Framework states that "to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities".</p> |

Additional housing at Mere will help sustain and enhance the settlement's services and facilities, which in turn will help to promote better levels of self containment and a viable sustainable community. Land at Castle Street, Mere extends to about 26 acres and lies to the South of Castle Street. The site itself is well enclosed; existing built form lies to the North beyond Castle Street, Town End nurseries to the East, Mapperton Hill to the West and hedgerow to the South. The site is currently outside but abuts the development limits of Mere; there is no policy restriction/designation on the site. It is considered that a well designed development having regard to its location and landscape containment, which is commensurate to the scale of the settlement, could be accommodated without detriment to the setting of Mere. For additional information please see attached Call for Sites Submission Form, Location Plan and previous SHLAA Form. This site was included within Wiltshire's previous SHLAA (Land off Castle Street, Mere ref s1 051 ). It is considered that this site could deliver approximately 160 dwellings within the SHLAA's initial 5 year period, development within this location would positively contribute to its locality and produce local housing that will go some way in sustaining the vitality of Mere. We hope that the above and attached information clearly outlines our interest and provides sufficient information to inform the 'Call for Site's process. Should you require any further information then please do not hesitate to contact me.

103 Seend

This letter comprises a note, on behalf of Persimmon Homes Wessex (PHW), in response to the Council's 'Call for Sites' process. PHW controls land at School Road, Seend, extending to approximately 3.3 acres. Within Wiltshire Core Strategy Pre-Submission Document (tracked Changes Version, April 2014), Seend is identified as a Large Village within Melksham Community Area. The Melksham Community Area is predominantly rural in character and the main settlement within the Community Area is Melksham. Development in the Community Area is based on a settlement hierarchy which constitutes settlements depending on the level of services and local facilities available. For the Community Area the Settlement Hierarchy is as follows; Market Town: Melksham Large Villages: Atworth, Seend, Semington, Shaw/Whitley and Steeple Ashton. Small Villages: Beanacre, Berryfield, Broughton Gifford, Bulkington, Great Hinton, Keevil, Poulshot and Seend Cleeve. The scale of development proposed for the Community Area is shown below; Area Requirement 2006-2026 Melksham Town 2,240 Community Area Remainder 130 Community Area Total 2,370 Taking into account completions and sites with planning permission (2006-2014) the remaining requirement for the Melksham Community Area is as follows; Area Remaining Requirement 2006-2026 Melksham Town 752 Community Area Remainder 51 Community Area Total 803 PHW considers that a comprehensive review of the existing settlement boundaries through the Housing Site Allocations DPD should be undertaken to enable the delivery of sustainable development throughout the Plan Period. The comprehensive review should be undertaken irrespective of overall housing provision as the above housing requirements for the Community Area are 'indicative' minimum figures. A large proportion of

Wiltshire's population live in the rural areas, additional housing within these areas is critical to ensure that local needs are met and that the vitality of rural communities are sustained. Paragraph 55 of the National Planning Policy Framework states that "to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities". The NPPG expands on rural housing and states that "a thriving community in a living, working countryside depends, in part, on retaining local services and community facilities such as schools, local shops, cultural venues, public houses and places of worship. Rural housing is essential to ensure viable use of these local facilities. Assessing housing need and allocating sites should be considered at a strategic level and through the Local Plan and/or neighbourhood plan process. However all settlements can play a role in delivering sustainable development in rural areas". In response to the NPPG the settlement boundaries at the Large Villages should be comprehensively reviewed to enable sustainable development at settlements such as Seend. In the last few years Wiltshire villages have seen a loss of key services and facilities such as the closure of local shops and pubs. Additional housing within the villages which are best served by services and facilities will go some way to ensure that sustainable development is sustained. Seend is a sustainable Large Village where there are a number of key services and facilities such as; Post Office A Pub A Post Office Village Shop Primary School Recreation Ground Regular Bus Services The site comprises approximately 3.3 acres of land to the North West of Seend. The site itself is well enclosed; School Road abuts the site to the South, a Bridle Way to the East and dense hedgerow to the North and West. The site is to be accessed from School Road. The majority of the village falls within a Conservation Area, however the northern and western fringes fall outside the designation. The site is currently outside but abuts the development limits of the village; there is no policy restriction/designation on the site. It is considered that a well designed development having regard to its location and landscape containment, which is commensurate to the scale of the village, could be accommodated without detriment to the setting of the village. For additional information please see attached Call for Sites Submission Form and Location Plan. It is considered that this site could deliver approximately 30 dwellings within the SHLAA's initial 5 year period, development within this location would positively contribute to its locality and produce local housing that will go some way in sustaining the vitality of Seend. We hope that the above and attached information clearly outlines our interest and provides sufficient information to inform the 'Call for Site's process. Should you require any further information then please do not hesitate to contact me.

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| 104 | Burbage  | I attach herewith a completed call for submission of sites form and location plan for a site in Burbage for a nursing home.  |
| 105 | Westbury | Re: Call for Sites. This letter comprises a note, on behalf of Persimmon Homes Wessex (PHW), in response to the Council's 'Call for Sites' process. Persimmon Homes Wessex controls land to the west of Mane Way, Westbury. Within Wiltshire Core Strategy |

Pre-Submission Document (Tracked Changes Version, April 2014), Westbury is identified as a Market Town within Westbury Community Area. Development in the Community Area is based on a settlement hierarchy which constitutes settlements depending on the level of services and local facilities available. For the Community Area the Settlement Hierarchy is as follows; Market Towns: Westbury Large Villages: Oilton Marsh and Bratton. Small Villages: Edington/Tinhead. The scale of development proposed for the Community Area is shown below; Area Requirement 2006-2026 Westbury Town 1,500 Remainder 115 Community Area Total 1,615 Taking into account completions and sites with planning permission (2006-2014) the remaining requirement for the Westbury Community Area is as follows; Area Remaining Requirement 2006-2026 Westbury Town 203 Remainder 57 Community Area Total 260 PHW considers that a comprehensive review of the existing settlement boundaries through the Housing Site Allocations DPD should be undertaken to enable the delivery of sustainable development throughout the Plan Period. The comprehensive review should be undertaken irrespective of overall housing provision as the above housing requirements for the Community Area are 'indicative' minimum figures. Additional housing at Westbury will help sustain and enhance the Town's services and facilities which will in turn help to promote better levels of self containment and a viable sustainable community. PHW controls land at Mane Way, Westbury. The site is located to the South of the strategic allocation (Land at Station Road , Westbury) in the emerging Core Strategy. The land comprises approximately 27 hectares of relatively level greenfield land to the West of Westbury. Given the nature and extent of the various planning constraints in and around the draft allocation at Westbury, the scale of the strategic site is insufficient to achieve a viable and deliverable development. PHW believes that the release of Land at Mane Way, Westbury could help to unlock the delivery of the Station Road site and bring significant benefits to the town, as envisaged by the Westbury Town Plan. The site is currently outside but abuts the development limits of the Town; there is no policy restriction/designation on the site. It is considered that a well designed development having regard to its location and landscape containment could be accommodated without detriment to the setting of Westbury. For additional information please see attached Call for Sites Submission Form and Site Location Plan. It is considered that this site could deliver approximately 500 dwellings within the SHLAA's initial 5 year period, development within this location would positively contribute to its locality and produce local housing that will go some way in sustaining the vitality of Westbury Town. We hope that the above and attached information clearly outlines our interest and provides sufficient information to inform the 'Call for Sites' process. Should you require any further information then please do not hesitate to contact me.

106 Westbury Re: Call for Sites. This letter comprises a note, on behalf of Persimmon Homes Wessex (PHW), in response to the Council's 'Call for Sites' process. Persimmon Homes Wessex controls land at Leigh Park, Westbury. Within Wiltshire Core Strategy Pre-

Submission Document (tracked Changes Version, April 2014), Westbury is identified as a Market Town within Westbury Community Area. Development in the community area is based on a settlement hierarchy which constitutes settlements depending on the level of services and local facilities available. For the Community Area the Settlement Hierarchy is as follows; Market Towns: Westbury Large Villages: Oilton Marsh and Bratton. Small Villages: Edington/Tinhead. The scale of development proposed for the Community Area is shown below; Area Requirement 2006-2026 Westbury Town 1,500 Remainder 115 Community Area Total 1,615 Taking into account completions and sites with planning permission (2006-2014) the remaining requirement for the Westbury Community Area is as follows; Area Remaining Requirement 2006-2026 Westbury Town 203 Remainder 57 Community Area Total 260 PHW considers that a comprehensive review of the existing settlement boundaries through the Housing Site Allocations DPD should be undertaken to enable the delivery of sustainable development throughout the Plan Period. The comprehensive review should be undertaken irrespective of overall housing provision as the above housing requirements for the Community Area are 'indicative' minimum figures. Additional housing at Westbury will help sustain and enhance the Town's services and facilities which will in turn help to promote better levels of self containment and a viable sustainable community. The site is located on the western edge of Westbury (Leigh Park) and comprises approximately 4.83 acres of relatively level Greenfield land. The site itself is well enclosed; with the A3098 and Blackhorse Lane forming the boundary to the West and South-East, respectively. To the East lies an existing 2 storey residential development. Westbury Leigh Primary School is located to the North of the site. The site is to be accessed through 118 Chestnut Gardens; this is under Persimmon's control. The site is currently outside but abuts the development limits of the Town; there is no policy restriction/designation on the site. It is considered that a well designed development having regard to its location and landscape containment could be accommodated without detriment to the setting of Westbury. For additional information please see attached Call for Sites Submission Form and Location Plan. The site was included within Wiltshire's previous SHLAA (Land at Leigh Park, ref 268). It is considered that this site is deliverable within the SHLAA's initial 5 year period. Future residential development within this location would positively contribute to its locality and produce local housing that will go some way in sustaining the vitality of Westbury Town. We hope that the above and attached information clearly outlines our interest and provides sufficient information to inform the 'Call for Sites' process. Should you require any further information then please do not hesitate to contact me.

107

Sutton  
Benger

This letter comprises a note, on behalf of Persimmon Homes Wessex (PHW), in response to the Council's 'Call for Sites' process. PHW controls land at Sutton Lane, Sutton Benger, extending to approximately 9 acres. Within Wiltshire Core Strategy Pre-Submission Document (tracked Changes Version, April 2014) Sutton Senger is identified as a Large Village within Chippenham

Community Area. The Chippenham Community Area is predominantly rural in character and the main settlement within the Community Area is Chippenham. Development in the Community Area is based on a settlement hierarchy which constitutes settlements depending on the level of services and local facilities available. For the Community Area the Settlement Hierarchy is as follows: Principal Settlements: Chippenham Large Villages: Christian Malford, Hullavington, Kington St. Michael, Sutton Senger and Yatton Keynell. Small Villages: Biddestone, Burton, Grittleton, Kington Langley, Langley Burrell, Lower Stanton St. Quintin, Nettleton, Stanton St. Quintin and Upper Seagry. The scale of development proposed for the Community Area is shown below: Area Requirement 2006-2026 Chippenham Town 4,510 Community Area Remainder 580 Community Area Total 5,090 The highest tier settlement after the Principal Settlement of Chippenham is Large Villages. Sutton Senger is one of the Large Villages best suited to accommodate a reasonable proportion of the 580 dwellings identified. Taking into account Completions and sites with Planning Permission (2006-2014) the remaining requirement for the Chippenham Community Area is as follows: Area Remaining Requirement 2006 2026 Chippenham Town Community Area Remainder Community Area Total 275 302 576 Future development proposals for Sutton Senger are consistent with the Settlement Strategy for the Chippenham Community Area and will make an important contribution to meet the identified housing requirements for the Community Area. In any case, PHW considers that a comprehensive review of the existing settlement boundaries through the Housing Site Allocations DPD should be undertaken to enable the delivery of sustainable development throughout the Plan Period. The comprehensive review should be undertaken irrespective of overall housing provision as the above housing requirements for the Community Area are 'indicative' minimum figures. A large proportion of Wiltshire's population live in the rural areas, additional housing within these areas is critical to ensure that local needs are met and that the vitality of rural communities is sustained. Paragraph 55 of the National Planning Policy Framework states that "to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities". The NPPG expands on rural housing and states that "a thriving community in a living, working countryside depends, in part, on retaining local services and community facilities such as schools, local shops, cultural venues, public houses and places of worship. Rural housing is essential to ensure viable use of these local facilities. Assessing housing need and allocating sites should be considered at a strategic level and through the Local Plan and/or Neighbourhood Plan process. However all settlements can play a role in delivering sustainable development in rural areas". In response to the NPPG, the settlement boundaries at the Large Villages should be comprehensively reviewed as part of the Wiltshire Housing Site Allocations DPD. In the last few years Wiltshire Villages have seen a loss of key services and facilities such as the closure of local shops and pubs. Additional housing within the Villages which are best served by services and facilities will go some way to ensure that sustainable development is sustained. Sutton Senger is a sustainable Large Village where there are a number of key services and facilities such as: 2 Pubs A Restaurant A Post Office/Shop Primary School

Doctor's Surgery Recreation Ground Regular Bus Services The site is located on the Southern edge of the Village and comprises approximately 9 acres of level green field land. The site itself is well enclosed; existing residential development and the recreation ground abuts the site to the North, the other three boundaries comprise of dense hedgerow. The site is to be accessed from Sutton Lane. The site is currently outside, but abuts the development limits of the village; there is no policy restriction/designation on the site. It is considered that a well designed development having regard to its location and landscape containment, which is commensurate to the scale of the Village, could be accommodated without detriment to the setting of the Village. For additional information, please see attached Call for Sites Submission Form, Location Plan and previous SHLAA Form. This site was included within Wiltshire's previous SHLAA (Land at Sutton Lane, Ref: 600). It is considered that this site could deliver approximately 50 dwellings within the SHLAA's initial 5 year period, development within this location would positively contribute to its locality and produce local housing that will go some way in sustaining the vitality of Sutton Benger. We hope that the above and attached information clearly outlines our interest and provides sufficient information to inform the 'Call for Site's process. Should you require any further information then please do not hesitate to contact me.

108

Yatton  
Keynell

Re: Call for Sites This letter comprises a note, on behalf of Persimmon Homes Wessex (PHW), in response to the Council's 'Call for Sites' process. PHW controls land at Yatton Keynell, South of Farell Fields, extending to approximately 3.2 acres. Within Wiltshire Core Strategy Pre-Submission Document (tracked Changes Version, April 2014) Yatton Keynell is identified as a Large Village within Chippenham Community Area. The Chippenham Community Area is predominantly rural in character and the main settlement within the Community Area is Chippenham. Development in the Community Area is based on a settlement hierarchy which constitutes settlements depending on the level of services and local facilities available. For the Community Area the Settlement Hierarchy is as follows: Principal Settlements: Chippenham Large Villages: Christian Malford, Hullavington, Kington St. Michael, Sutton Benger and Yatton Keynell. Small Villages: Biddestone, Burton, Grittleton, Kington Langley, Langley Burrell, Lower Stanton St. Quintin, Nettleton, Stanton St. Quintin and Upper Seagry. The scale of development proposed for the Community Area is shown below: Area Requirement 2006-2026 Chippenham Town 4,510 Community Area Remainder 580 Community Area Total 5,090 The highest tier settlement after the Principal Settlement of Chippenham is Large Villages. Yatton Keynell is one of the Large Villages best suited to accommodate a reasonable proportion of the 580 dwellings identified. Taking into account Completions and sites with Planning Permission (2006-2014) the remaining requirement for the Chippenham Community Area is as follows: Area Remaining Requirement 2006 2026 Chippenham Town 275 Community Area Remainder 302 Community Area Total 576 Future development proposals for Yatton Keynell are consistent with the Settlement Strategy for the Chippenham Community Area and will make an important contribution to meet the identified housing requirements for



the Community Area . In any case, PHW considers that a comprehensive review of the existing settlement boundaries through the Housing Site Allocations DPD should be undertaken to enable the delivery of sustainable development throughout the Plan Period. The comprehensive review should be undertaken irrespective of overall housing provision as the above housing requirements for the Community Area are 'indicative' minimum figures. A large proportion of Wiltshire's population live in the rural areas, additional housing within these areas is critical to ensure that local needs are met and that the vitality of rural communities is sustained. Paragraph 55 of the National Planning Policy Framework states that "to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities". The NPPG expands on rural housing and states that "a thriving community in a ; living, working countryside depends, in part, on retaining local services and community facilities such as schools, local shops, cultural venues, public houses and places of worship. Rural housing is essential to ensure viable use of these local facilities. Assessing housing need and allocating sites should be considered at a strategic level and through the Local Plan and/or Neighbourhood Plan process. However all settlements can play a role in delivering sustainable development in rural areas". In response to the NPPG, the settlement boundaries at the Large Villages should be comprehensively reviewed as part of the Wiltshire Housing Site Allocations DPD. In the last few years Wiltshire Villages have seen a loss of key services and facilities such as the closure of local shops and pubs. Additional housing within the Villages which are best served by services and facilities will go some way to ensure that sustainable development is sustained. Yatton Keynell is a sustainable Large Village where there are a number of key services and facilities such as: A Pub A Post Office Village Shop Primary School Doctor's Surgery Recreation Ground Regular Bus Services The site is located on the Southern edge of the village and comprises approximately 3.2 acres of level green field land. The site itself is well enclosed; existing residential development (built in the 1980's) abuts the site to the North East/West, the other three boundaries comprise of dense hedgerow. The site is to be accessed from the existing development to the North, through Farrell Fields. The majority of the Village is washed over by the AONB; however, the most Southern part of the village falls outside the designation. The site is currently outside, but abuts the development limits of the village; there is no policy restriction/designation on the site. It is considered that a well designed development having regard to its location and landscape containment, which is commensurate to the scale of the Village, could be accommodated without detriment to the setting of the Village. For additional information, please see attached Call for Sites Submission Form, Location Plan and previous SHLAA Form. This site was included within Wiltshire's previous SHLAA (Land East of Farrell Field, Yatton Keynell, Ref: 482). It is considered that this site could deliver approximately 30 dwellings within the SHLAA's initial 5 year period, development within this location would positively contribute to its locality and produce local housing that will go some way in sustaining the vitality of Yatton Keynell. We hope that the above and attached information clearly outlines our interest and provides sufficient



information to inform the 'Call for Site's process. Should you require any further information then please do not hesitate to contact me.

- 109 Calne Please see attached a site submission on behalf of Bowood Estates as part of the Wiltshire Site Allocations DPD & SHLAA Call for Sites 2014.
- 110 General In the absence of a document to comment upon this representation is simply focused on spatial matters. Velcourt plc has previously commented on Laverstock being part of the wider Salisbury urban area. As an when specific allocations are made through the DPD, regard should be had for the locational and other sustainability credentials of potential sites, especially those which have ready access to the wide range of employment, retail and community facilities which form part of the Salisbury urban area. A separate representation as part of the SHLAA will be made concerning the suitability and merits of allocating land to the east of Church Road, Laverstock for housing purposes. This will replace a previous representation to reflect the up to date national and local planning policy position.
- 111 Bradford on Avon Wiltshire Housing Site Allocations DPD Representations on behalf of Barratt Homes Bristol Limited Site at Bradford on Avon Golf Course, Bradford on Avon We have been instructed by Barratt Homes Bristol who control some 7.31 hectares of land at Bradford on Avon Golf Course which they consider eminently suitable for residential development. We have been instructed to submit representations in respect of the Housing Site Allocations DPD. With regards the scope of the DPD, we consider that the guidance in the NPPF should be adhered to in terms of site selection. In that context the DPD should identify a supply of deliverable sites which can contribute towards not only meeting the overall housing requirement for the respective housing market area but also the 5 year supply of deliverable sites. To be considered deliverable, sites should be available now, offer a suitable location for development and be achievable with a realistic prospect that housing will be delivered on the site within five years. Furthermore, it is essential that the development of the site is viable. The DPD should require evidence from site promoters on the viability of their site. The site which Barratt Homes Bristol controls at Bradford on Avon is not only available but is suitable and achievable within 5 years. It also represents a viable development opportunity and we have confirmed this in representations separately made to the SHLAA call for sites. We trust that these comments will be taken into consideration and we look forward to taking part in forthcoming consultations in respect of this DPD. If in the meantime you require any additional information about the site then do not hesitate to contact us.

- 112      General - Studley      I am writing in response to the Council's consultation on the HSA process and how this would affect the village of Studley (Calne Without) The road system in Studley was laid down some centuries ago, certainly long before motorised transport was developed. This means that all the lanes in the village are single carriageway with no footpaths for pedestrians and no option to create any. Apart from local domestic traffic, the farming community also use the lanes, often with equipment weighing many tons and only just accommodated in the full width of the lanes in the majority of locations. Additionally, very large multi wheeled vehicles deliver timber to the Mill at the top end of Studley lane. Surprisingly, there have been few accidents with such a volatile mix of road traffic and pedestrians but the potential is there for all to see. A demonstration of how Studley copes with increased traffic is presented, thankfully a rare event, each time an accident on the A4 in the locality prompts the police to divert traffic through Studley. I would ask the council to seriously consider this aspect of development in the Studley location and the potential it would further raise for a regrettable outcome.
- 113      Calne      Please see attached a site submission on behalf of Bowood Estates as part of the Wiltshire Site Allocations DPD & SHLAA Call for Sites 2014.
- 114      Quemerford      Please see attached a site submission on behalf of Bowood Estates as part of the Wiltshire Site Allocations DPD & SHLAA Call for Sites 2014.
- 115      General - Studley      Please note that references to Studley are to be taken as an example of a broader point I am writing in response to the Council's consultation on the HSA Process. It is critical that the boundary review and the allocation process HSA DPD properly reflects the circumstance which existed before we were defined as a large village. (Confirmation of when this definition was exacted & whom were consulted needs clarification). Whilst accepting the constraints of the national planning framework and emerging core strategy, until the core strategy is fully in place, as an interim measure some policies were 'saved' from the North Wilts Local development Plan. These include for example, distinct Studley and Derry Hill boundaries. In the Calne community Area Action Plan 2006 - 2014 (updated in 2010) it was also stated 'It has also been agreed that the villages of Derry Hill, Studley and Heddington, should receive only limited infill housing development, appropriate for local housing needs.' <http://www.wiltshire.gov.uk/ccap-update-2010.pdf> . The boundary review must therefore recognise and incorporate these previous policies. It should also recognise that large villages may comprise of distinct components with intermediate boundaries and gaps that should also be respected.

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| 116 | Calne             | Please see attached a site submission on behalf of Bowood Estates as part of the Wiltshire Site Allocations DPD & SHLAA Call for Sites 2014.  |
| 117 | Market Lavington  | The attached completed pro-forma together with a letter of representation in relation to a potential development site for a residential development/redevelopment of land comprising no. 35 White Street and to the rear of White Street, Market Lavington. The letter of representation assesses the suitability, deliverability and achievability of the development of the site, taking into account the WILTSHIRE CORE STRATEGY METHODOLOGY FOR DISAGGREGATION OF INCREASED HOUSING REQUIREMENT TO COMMUNITY AREA AND HOUSING MARKET AREA LEVEL January 2014. The Wiltshire Housing Site Allocations DPD is the subject of consultation on the scope of the documents running from Monday 24 March 2014 until Monday 5 May 2014. The DPD will set out additional site allocations for housing, across Wiltshire to ensure supply throughout the plan period. In addition, the document will address the review of existing settlement boundaries. The plan making process for this DPD will involve the consideration of site proposals, of which this representation is intended to be one such site proposal to be considered by the Council as part of this process. |
| 118 | Market Lavington  | Please see attached a site submission on behalf of Bowood Estates as part of the Wiltshire Site Allocations DPD & SHLAA Call for Sites 2014.  |
| 119 | General - Studley | Further to your request for comments with respect to your review of the HSA DPD, I am pleased to provide the following for your consideration. Whilst accepting the constraints of the national planning framework and emerging core strategy, it is critical that the boundary review and the allocation process HSA DPD properly reflects the circumstance which existed before Studley and Derry Hill were defined as a large village for planning purposes. In the Calne community Area Action Plan 2006-2014 (updated in 2010) it was stated It has also been agreed that the villages of Derry Hill, Studley and Heddington, should receive only limited infill housing development, appropriate for local housing needs. <a href="http://www.wiltshire.gov.uk/ccap-update-2010.pdf">http://www.wiltshire.gov.uk/ccap-update-2010.pdf</a> . The boundary review must, therefore, recognise and incorporate these previous policies. It should also recognise that large villages may comprise distinct components with intermediate boundaries and natural gaps that should also be respected.  |
| 120 | General           | I am writing to object to any proposals regarding developing the land at Wenhill Heights, Wenhill Lane in Calne (site 709) for the following reasons:- 1. There is not sufficient vehicular access to the site if the site were to be developed. It is my understanding that the proposal is for 60 houses to be built, if planning were to be approved, and the road in and out of the cul -de-sac cannot  |

take potentially in excess of another 100 cars/ vehicles. 2. The access to the site along Wenhill Lane is also unsuitable. It is my understanding that this lane is only a footpath and the public have no legal right to drive on it unless they have the express permission of the landowner. The lane is incredibly narrow and lorries to the depot at the sewage works would find it incredibly difficult if there was an increase in traffic using this lane, surely it is very important that they can obtain unlimited access at all times. 3. It would have a negative impact on the safety of rights of way users, and I know from using the lane myself a lot, that it is a well used route (incidentally a route is also included in many walking guides of the area).

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| 121 | General                 | I am writing with respect to your review of the HSA DPD and your request for comments. I have now had the opportunity to read various documents and conclude that the scope of the HSA DPD must cover the effect of housing site allocations within rural hamlets through the core strategy process, even when such a community has been aggregated with a larger neighbour and re-defined as a 'large village' for planning purposes. In practice, this means the review needs to take cognisance of the scale and character of the smaller element of the 'large village' together with the impact of any natural boundaries that exist. Furthermore, in the Calne community Area Action Plan 2006-2014 (updated in 2010) it was stated It has also been agreed that the villages of Derry Hill, Studley and Heddington, should receive only limited infill housing development, appropriate for local housing needs. ☞ <a href="http://www.wiltshire.gov.uk/ccap-update-2010.pdf">http://www.wiltshire.gov.uk/ccap-update-2010.pdf</a> |
| 122 | Calne                   | Please see attached a site submission on behalf of Bowood Estates as part of the Wiltshire Site Allocations DPD & SHLAA Call for Sites 2014.  |
| 123 | General -<br>Marden Way | I am writing to you in respect of the SHLAA consultation that is currently being undertaken. I write to object to any consideration to the land at the end of Marden Way being considered for development. If, as I understand the land is being considered for further residential development then I must object on the grounds of inadequate access via Wenhill Lane and Marden Way. Wenhill Lane is designated as a public footpath and is not suitable to take traffic as a route into the proposed development. Marden Way is a busy narrow road with seven turnings into cul de sacs and large amounts of street parking which already restricts access without the prospect of it acting as a main route into a further substantial development. I would ask that you note this objection and please let me know when the completed SHLAA will be made.   |
| 124 | Sutton<br>Benger        | Please see the attached Plan and submission form for Arms Farm, Sutton Benger.  |

- 125      General -  
Studley      I am writing in response to the Council's consultation on the HSA process. I appreciate the constraints of the national planning framework and emerging core strategy, but feel that the boundary review and the allocation process HSA DPD should properly reflect the circumstance which existed before any settlements were defined as a large village. I'm conscious that there appears to be an inconsistency between Core policy 1, 4.13 and 4.15 relative to the way in which the settlement boundary will be reviewed (difference between "changes" and "buildings"). In my opinion, the latter should prevail: two previously separated areas should not be treated as one. Until the core strategy is fully in place, as an interim measure some policies were 'saved' from the North Wilts Local development Plan. These include for example, distinct Studley and Derry Hill boundaries. In the Calne community Area Action Plan 2006-2014 (updated in 2010) it was also stated 'It has also been agreed that the villages of Derry Hill, Studley and Heddington, should receive only limited infill housing development, appropriate for local housing needs.' <http://www.wiltshire.gov.uk/ccap-update-2010.pdf> . The boundary review should recognise and incorporate these previous policies. It should also recognise that large villages may comprise of distinct components with intermediate boundaries and gaps that should also be respected.
- 126      Calne      WILTSHIRE HOUSING SITE ALLOCATIONS DEVELOPMENT PLAN DOCUMENT LAND AT CHILVESTER HILL, CALNE Please find enclosed representations to the Site Allocations Development Plan Document scoping consultation. These representations are submitted on behalf of my client, the Honorable Shane O' Neill, in respect of his land interests at Chilvester Hill, Calne. It is requested that the site is taken forward as an allocated site in the emerging Development Plan Document given that it is a sustainably located and deliverable housing site located on the edge of Calne. Also enclosed in support of the site are the following documents: 1. Background document prepared by Fisher German April 2014 2. Extended Phase 1 Habitat Survey prepared by Peak Ecology March 2013 3. Highway Impact Appraisal undertaken by Bancroft Consulting March 2013 4. Indicative masterplanning document prepared by Influence CLA March 2013 5. Completed SHLAA form for the specific section of site included in this representation 6. Copy of the submission made to the Wiltshire SHLAA in 2012 which includes this site as part of a wider land holding
- 127      General -  
Studley      I am writing in response to the Council's consultation on the HSA process. There appears to be an inconsistency between Core policy 1, 4.13 and 4.15 relative to the way in which the settlement boundary will be reviewed. I believe the latter should prevail: two previously separated areas should not be treated as one. Until the core strategy is fully in place, as an interim measure some policies were 'saved' from the North Wilts Local development Plan. These include for example, distinct Studley and Derry Hill boundaries. In the Calne community Area Action Plan 2006-2014 (updated in 2010) it was also stated 'It has also been

agreed that the villages of Derry Hill, Studley and Heddington, should receive only limited infill housing development, appropriate for local housing needs. <http://www.wiltshire.gov.uk/ccap-update-2010.pdf> . The boundary review should recognise and incorporate these previous policies. It should also recognise that large villages may comprise of distinct components with intermediate boundaries and gaps that should also be respected. I appreciate the constraints of the national planning framework and emerging core strategy, but feel that the boundary review and the allocation process HSA DPD should properly reflect the circumstance which existed before any settlements were defined as a large village.

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| 128 | General | <p>Reference: Scope and Content of the Draft Wiltshire Housing site Allocations DPD Further to the current consultation on the scope of the HSA DPD I wish to make the following representations covering the situation where a 'large village' for planning purposes comprises a hamlet or small village aggregated with a larger neighbour. This might arise where a settlement has been newly defined as a large village, or there have been a longer term assumption that two adjacent settlements with formerly discrete boundaries have been treated for planning purposes as a larger village. 1. In such cases the scope of this HSA DPD must cover the practical effect of housing site allocations within the settlement. At a practical level the boundary review and the allocation process /HSA DPD can and should properly reflect (1) the scale, character and capacity of distinct village/hamlet identities; and (2) respect any natural boundaries or 'subsections' within a settlement. 2. As part of the HSA DPD, settlement boundaries will be reviewed. There is an inconsistency between Core policy 1, 4.13 and 4.15 in the description of the purpose/parameters of the boundary review: Para 4.13: 'These settlement boundaries will be reviewed as part of the Wiltshire Housing Site Allocations and Chippenham Site Allocations DPDs, as set out in the Council's Local Development Scheme, in order to ensure they are up to date and can adequately reflect changes which have happened since they were first established . ' On the other hand , Para 4.15 is written as follows: 'These settlement boundaries will also be reviewed as part of the Housing Site Allocations DPD as set out in the Council's Local Development Scheme, in order to ensure they remain up to date and properly reflect building that has happened since they were first established .' I urge you to clarify that in the HSA process the definition used in 4.15 is adopted, and that only physical changes are taken into account in the boundary review " rather than the policy change to define two previously physically separated areas as one. 3. Neighbourhood plans are at such an early stage of preparation, and the HSA DPD should not create a situation in the interregnum which is manifestly prejudicial to localism. Therefore, In the meantime, the HSA DPD should adopt an assumption that large villages may comprise distinct components with internal boundaries and gaps which must be respected.</p> |
| 129 | Sutton  | <p>Please see the attached Plan and submission form for Arms Farm, Sutton Benger.</p>   |

	Benger	
130	General - Barford St Martin	I wish to strongly object to the possible development of the land on Mount Lane, Barford St Martin, for future residential use because Mount Lane and Short Lane cannot taking any more traffic. Whenever West Street is closed, the extra traffic using Short Lane and Mount Lane as a cut through, causes congestion and unpleasantness. For every house built on the land it could mean an extra 1 to 4 cars per household! Also lorries going up and down the lanes whilst construction was taking place would be intolerable! I would also like to add that I had heard that Mr Woolley originally bought the field so that nobody would build on it. It is also my understanding that his descendents have retained 50% of the field. So I can only assume that they retained 50% so that they could ensure that Mr Woolley's original wishes were met! If the family wanted to develop the land, surely they wouldn't have sold 50% to the Faulls but 100% to a developer. It is one small field in a village, whereas Wiltshire has plenty of other land that could be developed. Please leave the field on Mount Lane alone for the Barford St Martin community to enjoy!
131	General	Please find set out below representations from PlanningSphere on behalf of various landowners and developers with land interests in Wiltshire. Comments on Proposed Site Allocation DPD We strongly support Wiltshire Council's stated intention to progress a Site Allocations DPD for Wiltshire. We previously called for such commitment in various CS representations, and in our participation of the Core Policy 2 Examination Hearing Session that took place in 2013. We raised concern over the ability of the Neighbourhood Planning process to deliver required non-strategic housing development necessary to meet objectively assessed needs. We also highlighted to the Inspector the outdated existing Local Plan settlement boundaries, which were drawn up over a decade ago, and are clearly in need of review. Notwithstanding our concern over the spatial footprint of the Eastern SHMA, which does not appear to relate to any logical housing market area, we nevertheless consider that in structuring the DPD it would make sense to align it to Wiltshire's three HMAs, as defined in the Core Strategy. We suggest that the existing settlement boundaries are revised to take account of new and committed development, correct any arbitrary alignments that are not topographically based, and also be drawn to enclose the strategic allocations proposed in the Core Strategy. The Site Allocations DPD should also propose new housing and mixed-use non-strategic allocations. Non-strategic could be defined as a development plan allocation that is not in a higher tier plan, i.e. the Core Strategy. New non-strategic allocations should be proposed in locations irrespective of whether or not a local community is progressing, or wishes to progress a Neighbourhood Plan. Assessment of non-strategic allocations should be against objective sustainability criteria. The views of Parish Councils and Ward Councillors should be considered alongside other representations in a transparent way

following due process, and no veto should be afforded (NB. BANES tried to allow a PC veto in their rural area but this was rejected by the CS Inspector). WC should take the strategic lead and ensure that the Site Allocations DPD delivers, as a minimum, the increased housing requirement for Wiltshire that is now proposed in the Core Strategy main modifications. Neighbourhood Planning should be used to deliver additional growth where supported by communities. The Site Allocation DPD should clearly explain the relationship with the Neighbourhood Planning process. We suggest that new housing and mixed-use allocations are limited to the following settlement hierarchy: principal settlements; market towns; and large villages. We suggest that the Site Allocations DPD should also define town centre boundaries in Principal settlements and market towns in accordance with NPPF guidance.

- 132 Chippenham Attached: SHLAA sites submission form plan and delivery schedule.
- 133 Chippenham Please find attached SHLAA submission form. This land was put forward to the Core Strategy DPD in March 2012 and I wished to ensure that it was still under consideration.
- 134 Purton Please see attached.
- 135 General I am emailing regarding the Wiltshire Strategic Housing Land Availability Assessment (SHLAA) that is currently being undertaken. In Appendix 3 for Calne Community area I wish to comment on Site 709: Land at Wenhill Heights, Wenhill Lane: I wish to object to any proposal for housing to be developed on this land. The housing area leading up to this site (Marden Way) is all ready full with residents vehicles being parked on the road due to a lack of driveway parking and vehicular access to this site would be extremely difficult and dangerous. The landowner erected a steel gate to indicate that vehicular access is used however, I know residents who have lived there for 17 years and this has not been the case. We believe the gate was erected for the purposes of the SHLAA and would argue this has NEVER been used. There is poor vehicular access to the site. In the outline planning application for Silver Street (11/03628/OUT) the applicant wanted to build 60 houses on the field at the end of Marden Way which would mean that at least an additional 100 cars would be using either Wenhill Heights/Marden Way or Wenhill Lane. This would be in addition to the 101 houses that are currently being built on the Station Road development. The only access out would be through the roundabout at Station Road so with most homes having approximately two vehicles you could be looking at 300 EXTRA vehicles leaving this estate at the roundabout which would cause traffic chaos. It would also be dangerous as the fire engines would find access to their station difficult. Returning specifically to the land on Site 709, Marden Way or Wenhill Lane is suitable to carry extra traffic. In the application for phase 1 of the Silver Street Development



(13/06774/REM) the following comment was made with regards to the erection of 18 allotments up the field from the lane: "The allotment proposal has a number of car parking spaces which would require access via Wenhill Lane. Our Warden says he has had a lot of issues with Wenhill Lane, it is only a footpath but illegal parking has sometimes prevented residents getting to their properties and the public have no legal right to drive on it unless they have the express permission of the landowner. It is very narrow and lorries to the depot at the sewage works would find access more difficult if there is an increase in traffic using the lane. There would be a negative impact on the safety of rights of way users. While the provision of the allotments is to be supported the proposed access is unacceptable, so for the above reasons we object to this part of the planning application. If Wenhill Lane is unsuitable access for 18 allotments then it is surely unsuitable for 60 houses. This would be true also for site 709. Wenhill Lane is a public right of way used by ramblers and dog walkers frequently. The access to the site via Marden Way would be EXTREMELY dangerous. Currently the council's refuse truck has difficulty turning around and the access is simply not suitable for heavy construction traffic. Furthermore this is a residential area with many young children who play out in the streets on their bikes etc and this would be extremely dangerous for them. I also believe that this site was up for development circa 15 years ago and was dismissed due to the wildlife on this site, there were I believe protected bats and owls and other species that should be protected. Nothing has changed in the last 15 years or so with regards to the vehicular access or wildlife so I fail to see why this site would now be considered as a suitable site for building houses. Furthermore, I would draw to your attention the following Potential Suitability Constraints to development in addition to 'Within a Minerals Resource Zone' currently identified in the SHLAA assessment as viewed on [Wiltshire.gov.uk](http://Wiltshire.gov.uk) 1) Site 709 is not currently assessable from the primary road network. Wenhill Lane is designated as a Public Footpath with private vehicle rights. Wenhill Heights /Marden Way is an undulating residential road with 7 turnings, heavily parked on the roadway and therefore hazardous for additional through/access traffic. 2) Site 709 is diagonally traversed (NW to SW approx) by the GPSS pipeline (Government Pipeline and Storage System) requiring 3 meter wayleaves/easement with indemnities for work within the 3 meters. 3) Also referring to the SHLAA Methodology September 2011 Table 5 Accessibility, Site 709 currently is not within 400 meters of a bus stop. I would therefore request that based on the above comments that the site would now be identified as unsuitable subject to potential constraints and that the above constraint be clearly identified in any further issuing of the SHLAA for the Calne area. In addition could you please tell me when the completed SHLAA will be made available - maybe via the Wiltshire Council Consultation Portal - for public comment as the information it contains potentially affects all the residents of Wiltshire. This added building can only add to the traffic issues in this area and make the residents life more miserable - they have already had enough disruption with the new houses being built at the end of Station Road which surely has lowered the value of their houses.

- 136 Langey Burrell I represented this council at the meeting on 8th April, and subsequently presented the implications to our Council meeting on 14th April. Insofar as this Parish is concerned, the principal concern is the mooted development between the B4069 and Birds Marsh (the "Barrow Farm" site), which was brought to our attention by a local landowner completely "out of the blue" at the end of March, and even now has not been officially presented to us. Even our local Wiltshire Councillor for Kington Division was totally unaware that this was on the cards, and his first reaction to me was to describe it as an "ugly joke". This Council expresses its objections and concerns in the strongest possible terms for the following reasons: This proposal comes at a time when we have just learned that the controversial Hill Corner/Birds Marsh development has been approved in principle. That development alone, with the link road to the A350 motorway feeder, will have a huge impact on the rural community surrounding north Chippenham, as well as the people in the town itself. To now learn of further proposals to extent BEYOND this perimeter link road for a further half mile into the rural area beggars belief. This development, now encroaching round the eastern side of Birds Marsh, will further exacerbate the detrimental effect of urbanisation on this environmentally important site, and will ultimately result in the total sterilisation and vandalism of the woodland and its wildlife. In the past, the preservation of rural buffer zones between the town and nearby rural communities has always been a fundamental principle of new developments. This latest proposal deals a final blow to the rural settlement of Langley Burrell - the urban sprawl will be in such close proximity to the village as to totally annihilate the rural nature and ambience of the community, and the existing strong community spirit will be destroyed. Development south of Birds Marsh, we could reluctantly accept as tolerable - but this latest proposed incursion into the countryside is A STEP TOO FAR! This council is appalled that such a proposal is even being considered at this time, and believes it should be resisted by all possible means. It should certainly NOT be included in the 2026 Core Strategy.
- 137 Lydiard Tregoz Please see attached a site at Lydiard Tregoz as part of the Wiltshire Site Allocations DPD & SHLAA Call for Sites 2014.
- 138 Bulkington Affordable Housing. Please see map attached.
- 139 General I have been following proposed developments that potentially affect my property for some years now. Unfortunately the information provided in your documents and on the web have left me more concerned than ever. They do not indicate where the proposed developments are to take place and how/if they will effect me. I would appreciate any further information, ideally with greater detail, as soon as you are in a position to provide it.

- 140      General -  
Marden Way      I have been made aware by a neighbour that the land at the end of Marden Way has been put forward by the land owner as a suitable site for housing. I have also been informed that I may raise objections to this and as such I have several comments that I think pertinent to this assessment (appendix 3 for Calne Community Area (Site 709, Land at Wenhill Heights, Wenhill Lane); I would draw to your attention the following Potential Suitability Constraints to development in addition to 'Within a Minerals Resource Zone' currently identified in the SHLAA assessment as viewed on Wiltshire.gov.uk 1) Site 709 is not currently assessable from the primary road network. Wenhill Lane is designated as a Public Footpath with private vehicle rights. Wenhill Heights /Marden Way is an undulating residential road with 7 turnings, heavily parked on the roadway and therefore hazardous for additional through/access traffic. 2) Site 709 is diagonally traversed (NW to SW approx) by the GPSS pipeline (Government Pipeline and Storage System) requiring 3 meter wayleaves/easement with indemnities for work within the 3 meters. 3) Also referring to the SHLAA Methodology September 2011 Table 5 Accessibility, Site 709 currently is not within 400 meters of a bus stop. I would also ask that the site now be identified as a suitable subject to potential constraints and that the above constraint be clearly identified in any further issuing of the SHLAA for the Calne area. I am also of the understanding that the Sandpit Lane development (and the current Station Road Meadow site) should meet the delivery requirements of the Community Area Strategy thus making allocation of further sites unnecessary. Would you please also tell me when the completed SHLAA will be made available for public comment , many thanks.
- 141      General -  
Studley      Re: Response to Consultation on Scope and Content of the Draft Wiltshire HAS DPD As part of the HSA DPD, I understand that settlement boundaries will be reviewed. Whilst accepting the constraints of the national planning framework and emerging core strategy, I feel that it is important for the boundary review and the allocation process reflects the circumstance which existed before any boundary changes were made. For example as an interim measure some policies were grandfathered from the North Wilts Local development Plan which effect local hamlets which have now been defined as a large village. These include distinct Studley and Derry Hill boundaries and in the Calne community Area Action Plan 2006-2014 it was also stated that the villages of Derry Hill, Studley and Heddington, should receive only limited infill housing development, appropriate for local housing needs. This was a considered view based on the understanding of these communities and so it is important that the boundary review recognises and incorporates these previous policies. It should also recognise that large villages may comprise of distinct components with intermediate boundaries and gaps that should also be respected.
- 142      General -  
Studley      During the review of boundaries whilst undertaking the Wiltshire HSA DPD, I believe that it is important for the boundary review and the allocation process to reflect any existing decisions which have been made regarding the opportunity or

advisability of further development. This is particularly important where boundary changes have been made which potentially effects the overall planning guidelines such as when a number of smaller settlements have been aggregated into a larger one such as a large village . Thus, decisions made for the small villages and hamlets of Studley, Hedington and Derry Hill where it was decreed advisable that there should only be limited infill housing development, appropriate for local housing needs should remain as extant even if these are put together for planning purposes in the future. There should also be a recognition that large villages may comprise of distinct components with intermediate boundaries that should also be respected with regards the allowing of future development.

- 143      General -  
Studley      I am writing this email to object to the land at the end of Marden Way to be used for housing.I believe that it will leave a detrimental effect to the area as well as inadequate road structure in Wenhill Lane, Marden Way and the new estate at Station Road.Also the road at Station Road is totally unsuitable for anymore cars what with the new estate and our estate it can not cope with anymore.The area has had enough building over the last few years and if you are looking for more sites for houses other area's need to be looked at.I hope you will consider other options and consider this email as an objection.
- 144      Sherston      Here is a combined response to your Notification of Intention to Prepare Two New Development Plan Documents email below, from Shrewton Parish Council and Shrewton Neighbourhood Plan Steering Group. Our response particularly concerns the Wiltshire Housing Site Allocations DPD and the Call for Sites that will lead to an update of the SHLAA. General The timing of this document collides with developments of the Army Rebasing Plans and the Government Inspector s requirement to increase the housing target in Wiltshire to 42,000 new dwellings. Candidly, there does not appear to be any visible coordination across these activities or, more particularly, with reality on the ground and any effects on the communities. Shrewton is trying to plan, nevertheless, and to cater for the younger villagers that want to be able to live in their village community despite increasing competition from military and other outsiders. Army Rebasing. The plans briefed by Wilts Council and MOD DIO do not yet take account of the following developments and ongoing discussions. The highest concentration of rebased Army units will be in Larkhill, and has already started. Shrewton is Larkhill s nearest village to the west. Larkhill is scheduled to have 550 new SFA/MQs, although their final location remains unclear. What happens in Larkhill will affect Shrewton for accommodation, employment, traffic, entertainment and more. There are additional, unplanned military pressures for housing in Shrewton: Servicemen are already seeking to buy and rent housing in Shrewton. This pressure will increase as a result of new MOD allowances to encourage servicemen to buy local housing. Redundees and long-time veterans are moving into the area and seeking to buy in Shrewton. A proportion of these are expected to come with special health requirements. MOD DIO land sell

off. DIO is offering MOD land for sale in the area and has invited Shrewton to apply for two or more sites. MOD isn't just interested in revenue. MOD is also interested in any arrangement that would benefit servicemen or veterans by community integration. One possibility is for the number of dwellings in any potential Shrewton community build on ex-MOD land to be enhanced to include provision for some veterans or, perhaps, servicemen, under some form of community arrangement. The requirement has yet to be explored fully and would be subject to a community referendum. Government Inspector's Requirement. Shrewton is aware that the housing target for Wiltshire has been increased to 42,000. No further details have flowed down to Shrewton from Wilts Council. Fortunately, Shrewton has heard from sister Parishes that a decision has been made. The situation now (as we understand it) is that 345 new dwellings are needed for 2006-26 in the rural remainder of the Amesbury Community Area which contains the 5 large villages of Great Wishford, Porton, Shrewton, Tilshead and the Winterbournes. After completions and committed sites are removed, the requirement drops to 197. This raises two questions: Is the allocation to be equal i.e.  $200 \div 5 = 40$ , or should it be pro-rata, in which case Shrewton would have a higher target? Who decides, when and how is this decided? Is this additional to any other requirements e.g. Housing Needs Survey, or is it just a baseline minimum requirement? Neighbourhood Plan Subject to the community referendum and resolution on boundary issues, Shrewton aims to have a draft Neighbourhood Plan ready for the approvals process by end 2014. Shrewton's Housing Needs Survey has recommended 64 new dwellings by 2026, however Shrewton would need to build 140 small dwellings just to reach the national average. Shrewton is currently conducting a questionnaire of all villagers to capture their views, suggesting that the final target should be somewhere between 64-140. It is not yet clear whether these would include the Government Inspector's requirement or whether it would be additional. Advice is requested from Wilts Council. Shrewton is in the process of updating its planning boundary and will be submitting a request for a new planning boundary in support of the Neighbourhood Plan. The scope of this plan includes the following sites listed in the SHLAA 2009 and on the Wiltshire Council website. (Of note, no Shrewton land is listed in the SHLAA 2012 document). The site numbers are: 5, 51, 77, 113, 134, 146, 147, 148, 149, 150, 151, 152, 153, 154, 209 and 249. According to the SHLAA 2009, Site 249 was in Shrewton but the website shows in being in Downton - either way, it is not in scope. Traffic is the top, sensitive community issue. The centre of the village is increasingly used by commuters and heavy traffic, and the A360 literally divides the village and the functioning of the community. The majority of village traffic heads east. Consequently, any development in Shrewton has to be on the east side of the village in order to reduce traffic. This means that the only sites for development being considered by the Neighbourhood Plan are, in priority order: 154 - Land between Nett Road and London Road. This option has several advantages for traffic, access and safe pedestrian access to existing houses. 153 - Land south of London Road 151 - Land south of Nettley Farm. This would have access issues 150 - Land north of Rollestone Manor Farm. This would have access issues 77 -

Land at Nettwood Farm. This would have access issues. All other site numbers (discounted or included in SHLAA 2009) are treated as excluded/discounted. This includes site 109 (see below). Please could Wilts Council acknowledge this request. Site 109 - Land North of the Hollow is listed as being in Shrewton. It abuts the existing Shrewton Planning Boundary and will be included in the revised Shrewton Planning Boundary, as it is, to all practical purposes, in Shrewton village. However, it is within Orcheston Parish boundary - an anachronism that the forthcoming Wiltshire Parish Boundary Review may normalise.

Shrewton requests Wilts Council to confirm that 109 is in Shrewton for planning purposes. Wiltshire Housing Site Allocations DPD. Shrewton requests that the DPD takes full account of the above community request and that it forms the core of the draft Shrewton Neighbourhood Plan. Call for Sites. Wilts Council is requested to confirm whether or not new applications for the above five sites are required. Shrewton would welcome the chance to discuss the above with you to aid your and our planning. We can, of course, provide further information should you require it.

- 145      General -  
            Studley      I am writing in response to the Council's consultation on the HSA process. Whilst accepting the constraints of the national planning framework and emerging core strategy, it is critical that the boundary review and the allocation process HSA DPD properly reflect the circumstance which existed before we were defined as a large village. Until the core strategy is fully in place, as an interim measure some policies were "saved" from the North Wilts Local development Plan. These include for example, distinct Studley and Derry Hill boundaries. In the Calne community Area Action Plan 2006-2014 (updated in 2010) it was also stated 'It has also been agreed that the villages of Derry Hill, Studley and Heddington, should receive only limited infill housing development, appropriate for local housing needs.' <http://www.wiltshire.gov.uk/ccap-update-2010.pdf> . The boundary review must therefore recognise and incorporate these previous policies. It should also recognise that large villages may comprise distinct components with intermediate boundaries and gaps that should also be respected.
- 146      General      Response to Consultation: Scope and Content of the Draft Wiltshire HSA DPD The scope of this document must cover the practical effect of housing site allocations within rural hamlets through the core strategy process, even where they have been aggregated with a larger neighbour and re-defined as a 'large village' for planning purposes. In particular, the scope should address the scale and character of the hamlet, and the impact of any natural boundaries or distinct 'subsections' within a settlement that in whole or part has been newly defined as a large village for planning purposes.
- 147      General -  
            Barford St      I am writing to voice my concerns about the housing plot Site S29 " Land at Mount Lane (front field) Barford st Martin, I have lived in the village for over 68 years in Mount Lane. I have concerns due to the field being owned by more than one person. I m nearly 90 and still walk up this lane on a daily basis My other issues are as follows Flooding due to natural springs which can

Martin	<p>turn the whole lane into a river they come up in the gardens, if you were to build this would create more flooding issues for us in the lane This lane is very narrow and at peak times can become a rat run, traffic would become a real issue. Being within the AONB it is a lovely field used for grazing sheep, donkeys and horses over the years, this field is opposite a listed building. They often used this field for fetes and village activities. Please except this as my object to this site.</p>	
148	General	<p>Thank you very much for the opportunity to comment on the Scope and Content of the Draft Wiltshire DPD. My main concern is the interpretation of the settlement boundaries review with respect to housing. Whilst it may be administratively attractive to designate a number of smaller communities into a single entity it is important to recognise that these remain as distinct locations with regards to character development and evolution. So the HAS DPD needs to address the effect of housing site allocations within the specific communities regardless of whether these have been joined to other neighbouring settlements. For example the joining of a number of hamlets and a village into a single large village could then lose the history of development in the respective villages and hamlets which may have been made over time for very good reasons. It would be unreasonable to disregard previous policy decisions for locations because it has been designated within a larger area.</p>
149	General - Barford St Martin	<p>Ref: site S29 - Land at Mount Lane, Barford St Martin As a resident of Mount Lane I wish to object to the possible development of the land on Mount Lane, Barford St Martin, for future residential use, for the following reasons: This area of Barford st Martin is particularly attractive, with thatched cottages and Grade 2 listed properties. A modern development, however sympathetically done, cannot help but detract from the unique character and appearance of this part of the village. Development here would rob the village of valuable amenity space. Village events are frequently held here (with full consent of the owners). Over the last 12 months these have included a dance, quiz night, village cream tea and our annual summer fete, which raise money for upkeep of the village and various community projects, as well being vital in maintaining the vibrancy and sense of community in our village. The open aspect of the neighbourhood is a particular defining feature of this area of Barford St Martin, and any development in this area would completely destroy this characteristic. The adverse effect of the development on the setting of listed buildings, including The Old Cottage and Barford House on Mount Lane. The loss of existing views from neighbouring properties would adversely affect the residential amenity of neighbouring owners. These neighbouring properties include, but are not limited to, Barford House, Mount Cottage, The Old Cottage, Primrose Cottage and Deerhayes. The proposed density of the site at 11 properties is unacceptably high. The proposed development would be completely out of keeping compared with existing development in the vicinity, which consists entirely of three and four bedroom character detached properties. Mount Lane and Short Lane are narrow single carriageway country lanes; there is</p>

substantial concern regarding access and road capacity should a development go ahead. It should also be noted that the land on Mount Lane is under multiple ownership, not single ownership as stated on your plans. The residents of Barford St Martin are actively working on a Village Design Statement / Neighbourhood Plan to help with future planning. This is a long and time consuming piece of work which has been underway since October 2012. The plan specifically acknowledges that Barford is not ear-marked for development and it will only support appropriate in-fill development. Nowhere on our Plans do we foresee developing on the land on Mount Lane which we see as essential to our neighbourhood for the aforementioned reasons. I do hope our Plans will be taken into consideration when considering such future developments. Any plans to develop this land will be met with the most vigorous resistance by the residents of Barford St Martin.

- 150      Winterslow      We have discussed the Core Strategy and Spatial Planning at our last Parish Council meeting and I have been advised to inform you that the Parish Council refer to the current V.D.S for planning requests. The Parish Council are currently working on a Neighbourhood Plan so at the present time the V.D.S. is the current document. Would you like me to send you a copy of the V.D.S ? it highlights details of small scale planning suggestions for the Parish of Winterslow.
- 151      Barford St Martin      With reference to my telephone call to your office today, and on behalf of my Sister and myself, as joint owners of part of this parcel, may we record our support to your provisional proposal to identify this field for potential development, and in due course we would also support its allocation for development. For your information, my Sister and I own the western half of this parcel. We would also add that our views, with regard to the amount of development that might be appropriate for this field, may well be a subject for discussion with yourselves and the village, as although its total size might support eleven units, which is what I understand your report may have expressed, whether such number is appropriate may be for further consideration. To date no representations by the village have been presented to us, but if that opportunity is appropriate, please let us know. As you know, we have also identified a second parcel in the village known as the Orchard which no doubt will also receive your attention. No doubt you will be kind enough to keep us informed with the next stage of your review.
- 152      Collingbourne Ducis      Land at Collingbourne Ducis, Marlborough Please find attached two separate completed Site Submission Proformas, together with plans and a covering letter.
- 153      Chapmanslade      Thank you for your email of 20th March 2014 inviting comments on the proposed scope of the Wiltshire Housing Site Allocations DPD. I understand that it is proposed that the DPD will have two key purposes, namely (i) to identify housing sites to achieve the delivery of housing growth set out within the emerging Wiltshire Core Strategy, and (ii) to review settlement boundaries in



various settlements including 'Large Villages'. The scope of the document, as defined, is considered appropriate. This practice acts for Aedifico Limited which owns the Green Farm Industrial Estate and adjoining land ('the site') in the village of Chapmanslade, West Wiltshire. The site lies outside but immediately adjacent to part of the settlement boundary of Chapmanslade which is identified as a 'Large Village' in the emerging Core Strategy. With regard to the emerging Housing Site Allocations DPD, my client proposes (i) the allocation of the site for housing purposes, and (ii) the realignment of the settlement boundary of Chapmanslade to include the site. A drawing, numbered AL(1)03A, is attached. This identifies the site in relation to the existing settlement boundary, and also shows the suggested alteration to the settlement boundary to include the site.

**Site Description** The site is located on the south side of High Street, Chapmanslade, and is occupied by a number of light industrial buildings collectively known as the Green Farm Industrial Estate. The buildings are former agricultural structures which were converted to light industrial use during the mid-1990s. They are of utilitarian design, and are served by an extensive area of concrete hardstanding and car parking. The site also includes a converted residential barn located to the rear of Green Farm Cottages. These cottages front High Street, and lie within the settlement boundary. Vehicular access to the site and to the adjoining residential accommodation at Green Farm is provided by a shared entrance from High Street. The village of Chapmanslade has a predominantly residential character with various supporting community facilities. Frontage housing is found directly opposite the site on the north side of High Street, as well as to the east of the site on both sides of the road. Further residential development forming part of the village is found to the west of the site beyond a short gap in frontage development on the south side of the High Street. The site is therefore located centrally within the village of Chapmanslade, and forms part of the village in both visual and functional terms. Planning permission was granted on 20th June 1995 under reference W95/0436 for the change of use of redundant farm buildings to industrial units. Prior to this time, the site formed part of a farm, and its exclusion from the defined village settlement would have been appropriate. The proposed housing site allocation

The site offers only a very basic standard of business accommodation with poor quality employment space, a low standard of supporting facilities, poor security, and shared access arrangements with adjacent residential accommodation. Employment use is considered to be unsustainable in this location as it is entirely dependent on private road transport for both employee commuting and for servicing and deliveries. The existing commercial buildings are of utilitarian design, and both these and the associated parking area are exposed to long views from the south over open countryside which forms part of a Special Landscape Area. This exposure is accentuated by the raised position of the site. The site has been put forward for residential use in response to the SHLAA 'Call for Sites'. The site is deliverable and developable for housing, and could accommodate up to 10 dwellings. Residential development would assist in meeting identified housing needs within the Warminster Community Area. Residential use would also be entirely compatible with the established character of the

surrounding area, and would offer opportunities for the substantial visual enhancement of both the site and the wider setting through high quality design and site screening. Additional housing would also support existing and new community facilities within the village. The site comprises previously developed land (PDL). The NPPF encourages the effective use of PDL provided that it is not of high environmental value. It also promotes the residential development of land in commercial use where there is an identified need for housing provided that there are not strong economic reasons why such development would be inappropriate. No such strong reasons are considered to arise in this case for the reasons set out above. The Planning Authority is therefore urged to allocate the site for housing purposes. The proposed alteration to the settlement boundary The site clearly forms part of the village of Chapmanslade in all respects other than planning status. This applies to both the commercial plot and to the converted barn located to the rear of Green Farm Cottages. The site forms a contiguous part of established development fronting the south side of this part of High Street, and its exclusion from the defined settlement area is now illogical. The historical use of the site for agricultural purposes ceased many years ago. The inclusion of the site within the village settlement limits is therefore considered appropriate in planning terms, and reflects both its established brownfield status and its physical relationship with adjacent development located within the defined settlement boundary. The suggested adjustment to the settlement boundary, as shown on attached drawing AL(1)03A, precisely follows the curtilage boundary of the developed plot. The Planning Authority is therefore urged to adjust the settlement boundary of Chapmanslade to include the site within this 'Large Village'. If you require any additional information or clarification at this stage, please contact me. In the meantime, kindly acknowledge safe receipt of this email.

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| 154 | General - Studley | I am writing to you regarding the Councils current consultation on the HSA process. Whilst accepting the constraints of the national planning framework and emerging core strategy, it is important that the boundary review and the allocation process HSA DPD reflects the decisions which have been made on the constituent parts of any group amalgamated for planning purposes. For example, as an interim measure (until the core strategy is fully in place) some areas were not included in the North Wilts Local development Plan. These include for example Studley and Derry Hill boundaries. In the Calne community Area Action Plan 2006-2014 it was stated 'It has also been agreed that the villages of Derry Hill, Studley and Heddington, should receive only limited infill housing development, appropriate for local housing needs' " see attached. Therefore, any boundary review must therefore recognise these previous plans. |
| 155 | Corsham           | Thank you for the opportunity to provide comment on the scope of the forthcoming Wiltshire Housing Site Allocations DPD. On behalf of our clients, De Vernon Trustees, please find attached representations relating to land south of Potley Lane,  |

Corsham which we propose for inclusion within the document.

- 156 Corsham Thank you for the opportunity to provide comment on the scope of the forthcoming Wiltshire Housing Site Allocations DPD. On behalf of our clients, De Vernon Trustees, please find attached representations relating to land north of Leafield Industrial Estate, Corsham which we propose for inclusion within the document.
- 157 Hilperton I write in connection with the above consultation on behalf of Heron Land Development Ltd (Heron) and Gallagher UK Limited (Gallagher). GL Hearn act on behalf of Heron and Gallagher in relation to land to the south of Devizes Road, Hilperton. An outline planning application for 15 dwellings on the site is currently being considered by Wiltshire Council (13/06879/OUT) and is due to be determined shortly. The submitted outline application has demonstrated that the National Planning Policy Framework's (NPPF) three-dimensional sustainable development test is met. The site has been, and will continue to be, promoted through the Council's Strategic Housing Land Availability Assessment (SHLAA) and is considered to be available, developable and suitable and appropriate as a housing site allocation to contribute to the 'indicative' housing requirement for Trowbridge (town) and Hilperton as set out in the emerging Core Strategy. The Council's intention to produce a Housing Site Allocations DPD is supported. It is clear that there is not sufficient land identified within settlement boundaries and through strategic site allocations in the Core Strategy to meet the identified housing requirement of 42,000 over the plan period (2006-26) and therefore additional sites will be needed to be identified outside of existing settlement boundaries defined in the adopted Local Plans. Housing Requirement The current housing requirement for Wiltshire, as proposed in the Council's proposed modifications to the Core Strategy is 42,000 dwellings over the plan period (2006-26). However, it has been recognised by the Core Strategy Inspector that the objectively assessed need for the Council area is actually in the region of 44,000 dwellings over the plan period (2006-26). As such the 42,000 dwellings figure proposed in the Council's proposed modifications to the Core Strategy is an "at least" figure. In this context, and to be robust, we consider it would be inappropriate for the Site Allocations DPD to limit allocations to just meet the Housing Requirement of 42,000 dwellings. Additionally the DPD should also take account of the potential non delivery of sites. Hence, the DPD should reflect, and should be prepared, in the context of an objectively assessed need of 44,000 dwellings. In this context, even if sufficient sites for 42000 dwellings have been identified, there is value, in terms of ensuring appropriate provision, in identifying a supply of dwellings over the 42,000 housing requirement. This approach to the identification of sites is supported in the Council's Topic Paper 15 Addendum - Housing Requirement Technical Paper February 2014, which states: The HMA housing requirements will remain a floor not a ceiling in order that should proposals for sustainable development over and above these figures come forward, then

in accordance with the NPPF, it should be allowed. That is, it remains a permissive plan to sustainable development and as such complies with paragraph 14 of the NPPF. Paragraph 10.8 Related to the above point, the Core Strategy as proposed to be modified sets out "indicative requirements" for each Community Area (and main towns). It is stressed that these are indicative figures. Accordingly the figures act as a guide to the likely scale of housing development within each community area, but cannot be considered as absolute. On that basis, and having regard to the above, a sustainable site should not be excluded from being allocated if the Community Area as a whole has achieved its "indicative requirement". The Local Development Scheme January 2014 (LDS) states that the Site Allocations DPD "will be used to identify sites where there is a potential shortfall in supply on the horizon, or neighbourhood planning is failing to deliver the numbers required to meet local needs". This is not planning positively to meet the identified housing need. It is accepted that where neighbourhood plans are in progress, these are expected to identify sites for development. However, the purpose of the Site Allocations DPDs is to provide certainty and transparency with regard to housing supply and the sites that will be delivered over the Plan period. The DPDs should therefore be used to positively allocate specific and deliverable sites that will contribute to meeting the Council's housing requirement. Any windfall sites should be considered as a bonus above the minimum required amount. A reliance on windfall sites to deliver the identified housing requirement is not robust and realistic, and would not be a proactive and positive response to the housing delivery challenge. Rather, the housing requirement should be properly addressed by allocating specific sustainable and deliverable sites and working with developers to ensure that the communities that are delivered are sustainable and well-planned. Size of Sites A lower limit of site sizes will no doubt be necessary in terms of practicalities of producing the DPDs. A lower limit of 0.5ha or 10 dwellings is considered to be an appropriate lower limit for the Site Allocations DPDs. However, it is considered that there should be no upper limit to the size of potential sites allocated through the Site Allocations DPD, providing that a site would not conflict with the overall strategy of the Core Strategy. Timescales It is noted that the Chippenham Site Allocations DPD has the same timescales to adoption in the LDS (anticipation adoption in June 2015) as the overall Housing Site Allocations DPD. It is therefore not clear why two separate documents are being produced, although we recognise that there is likely to be some eagerness on behalf of the Council to adopt both the proposed DPDs as soon as possible in order for the Council to be able to demonstrate a continued 5 year supply of available housing land. In terms of the timetable for preparation of the two Site Allocation DPDs, it is noted that there will only be one round of formal consultation on the documents (in Sept/October 2014) before the documents are submitted for Examination. Whilst it is understood that the Council will be looking to progress the preparation of the documents as quickly as possible, we would perhaps question whether the single public consultation stage will allow appropriate consideration and scrutiny of the proposed allocations to

enable the documents to be found sound at an Examination in Public.

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| 158 | Ashton<br>Keynes | Please see attached submission for land at Ashton Keynes as part of the Wiltshire Site Allocations DPD & SHLAA Call for Sites 2014.  |
| 159 | Shrewton         | Land south of Netley Farm/north of Amesbury Road, Shrewton (as identified as site S151 in current SHLAA and on attached plan number 14074-2).  |
| 160 | Shrewton         | Land to the north of the A360, Amesbury Road, Shrewton (as identified as site S150 in current SHLAA and on attached plan number 14074-2 - indeed that is the same plan as representation 1).   |
| 161 | Shrewton         | Land to the west of Tanners Lane and south of the Hollow, Shrewton (see sites 146, 147, 148 and 149 in the current SHLAA together with extended areas marked B' and C' and as identified on plan number 14074-4).  |
| 162 | Shrewton         | Land at Rollestone Manor Farm and adjoining grain store site, Shrewton (please see site S152 of current SHLAA plus additional land to the south-west (marked A' on plan) and as identified on plan number 14074-5).  |
| 163 | Shrewton         | Land to the south of the London Road (as shown as sites S153 and S154 of the current SHLAA and as identified on plan 14074-3 as attached)  |
| 164 | Urchfont         | I am pleased to enclose details for land west of Stone Pit Lane, Urchfont, to be considered as part of the Wiltshire Housing Site Allocations DPD process. As requested I have attached the completed SHLAA form and site plan.                              |
| 165 | Beanacre         | See attached SHLAA submission for land off Chapel Lane, Beanacre.  |
| 166 | Whitley          | I am pleased to enclose details for land off Corsham Road, Whitley, to be considered as part of the Wiltshire Housing Site Allocations DPD process. As requested I have attached the completed SHLAA form and site plan.                                     |
| 167 | Calne            | Please find the attached representations to the Wiltshire Call for Sites DPD and SHLAA submitted on behalf of Mr and Mrs O'Keeffe in respect of Rookery Farm, Calne.   |
| 168 | Calne            | Land at Wenhill North, Land at Wenhill South and Land at Stock Street Farm On behalf of our client Bowood Estates we submit the following three sites as part of the Wiltshire Site Allocations DPD and SHLAA Call for Sites: Land at Wenhill North; Land at |

Wenhill South; and Land at Stockstreet Farm. Accordingly, we enclose the following documents: Completed Forms; and Site Plan (ref: BOWA2004, 2000). Given that consent has been permitted at Station Road, Silver Street and Marden Farm, we consider there is merit in considering a holistic approach to delivery of development at Southwest Calne, which would also include Land at Vern Leaze. Please see enclosed site plan (ref: BOWA2004, 2000). Should you require further information regarding the above or have any queries please do not hesitate to contact me.

- 169      Calne      Land at Wenhill North, Land at Wenhill South and Land at Stock Street Farm On behalf of our client Bowood Estates we submit the following three sites as part of the Wiltshire Site Allocations DPD and SHLAA Call for Sites: Land at Wenhill North; Land at Wenhill South; and Land at Stockstreet Farm. Accordingly, we enclose the following documents: Completed Forms; and Site Plan (ref: BOWA2004, 2000). Given that consent has been permitted at Station Road, Silver Street and Marden Farm, we consider there is merit in considering a holistic approach to delivery of development at Southwest Calne, which would also include Land at Vern Leaze. Please see enclosed site plan (ref: BOWA2004, 2000). Should you require further information regarding the above or have any queries please do not hesitate to contact me.
- 170      Calne      Land at Wenhill North, Land at Wenhill South and Land at Stock Street Farm On behalf of our client Bowood Estates we submit the following three sites as part of the Wiltshire Site Allocations DPD and SHLAA Call for Sites: Land at Wenhill North; Land at Wenhill South; and Land at Stockstreet Farm. Accordingly, we enclose the following documents: Completed Forms; and Site Plan (ref: BOWA2004, 2000). Given that consent has been permitted at Station Road, Silver Street and Marden Farm, we consider there is merit in considering a holistic approach to delivery of development at Southwest Calne, which would also include Land at Vern Leaze. Please see enclosed site plan (ref: BOWA2004, 2000). Should you require further information regarding the above or have any queries please do not hesitate to contact me.
- 171      General -  
Sutton Veny      With regard to Wiltshire Councils notification and call for further consultation regarding: Notice of Intention to Consult on the Scope and Content of the Draft Wiltshire Housing Site Allocations Development Plan Document (DPD) and the Draft Chippenham Site Allocations Development Plan Document (DPD) Regulation 18 Notice I would like the scope of the consultation and documents to incorporate the following: Permitted Development Boundaries Review I would support the intention to consult on the review of ALL Permitted Development Boundaries for the Large Villages, especially Sutton Veny, which has no supporting council documentation of how the Permitted Development Boundary has been drawn up in the first place: The current Sutton Veny Permitted Development Boundary has never been consulted on “ it was just incorporated into the 2004 Local Plan without any further scrutiny or updating. The current out-of-date Sutton Veny Permitted Development

Boundary is endanger of just being incorporated again into the Wiltshire 2026 plans without further scrutiny, public consultation or formal adoption. The Sutton Veny PDB [Permitted Development Boundary] was reportedly drawn on a map by a planning officer with a ball-point pen over 25 years ago, with no local public consultation or Cabinet Adoption. The current Sutton Veny PDB excludes 70% of existing development within Sutton Veny village and is of a disproportionate size to the Sutton Veny Conservation Area Boundary, which is excessive in comparison to the Sutton Veny PDB and to other Conservation Area Boundaries in comparative Wiltshire villages and towns. Equally, the Sutton Veny Conservation Boundary was drawn up in 1975, and has not been updated or publically consulted on or validated at Cabinet level or formally Adopted. Self-build and/or Custom Build sites throughout Wiltshire should also be identified in accordance with the NPPF and Right To Build emerging policies which are supported by the HCA “ the Wiltshire Housing Site Allocations Development Plan does not make any provision for affordable self-build dwellings and is therefore not in-accordance with the NPPF. Conservation Area Statements [CAS] and Conservation Area Maps [CAM] Review Given that Conservation Area Statements [CAS] and Conservation Area Maps [CAM] are heavily referred to and relied upon during the planning application process to restrict/control/dictate development, it is wholly questionable that these out-dated and un-adopted documents [where they exist], are referred to and relied upon during the planning application process. In addition to a comprehensive review of all Large Villages Permitted Development Boundaries, I would assert that the 'intention to Consult on the Scope and Content of the Draft Wiltshire Housing Site Allocations DPD' also includes: A review of all Conservation Area Statements and Conservation Area Maps and their relationship to all Permitted Development Boundaries for Large Villages in West Wiltshire is conducted; To ensure that all PDPs and CA Statements are updated, relevant, publically consulted on and validated/Approved at Cabinet level and formally Adopted; and that they are made publically available online for the public to view. This will ensure that all PDBs + CA Boundaries are consistent with the Wiltshire Core Strategy 2026 and the NPPF, and have undergone public scrutiny and public adoption. I have tried to obtain Conservation Area Statements and Maps online, via telephone and in-person at Wiltshire Council's offices and I have been unsuccessful. I eventually obtained the Sutton Veny Conservation Area Map after 6 months of trying “ attached. Below is evidence of my attempts to obtain access to Conservation Area Statements/Maps and responses from officers who kindly attempted to help with my enquiries “ I attach the lists of Conservation Areas that they provided, however the lists still do not list ALL CAs within Wiltshire as there appears to be no comprehensive, formal list which is easily accessible via Wiltshire Council's planning website. This demonstrates that a Conservation Area review is also urgently needed.

FOLLOWING ATTEMPTS TO ACCESS ALL WILTSHIRE CONSERVATION AREA STATEMENTS AND MAPS: All of the Conservation Area Statements (those that existed, note that some areas don't have statements) are not available on the website, as they are not corporately branded, i.e. are not under the Wiltshire Council logo, as they were adopted under the former

districts prior to Unitary, which is an issue those higher up are working on, but is unlikely to be resolved anytime soon! Saying that, although there isn't a list of them on the website, I think you can get them if you know which ones you are looking for, by typing in e.g. Pewsey Conservation Area, into the search box on our website.....In the meantime, the former KDC has 75 Conservation Areas, all with some form of statement/management plan.....about 3 are relatively short (2-4 sides of A4) whereas the rest are much longer " 20-60 pages. We have them all as pdfs, but you will appreciate this will take a lot of time and space to upload and email over. So if I send you a list, are you able to search the website and I could email any over that you can't find? Let me know how best to help you! Pippa Card BA(Hons) MScHistCons IHBC Senior Conservation Officer We have 70 conservation areas in south Wiltshire but very few adopted appraisals (10) and they are not on the web as they have not been rebranded to the Wiltshire Council logo (they were undertaken when we were Salisbury District Council). I attach a list. If you want me to email you any of the appraisals, please let me know. Mrs Jocelyn Sage Conservation Officer Attached is the list of conservation areas. We don't have any kind of appraisal for most of them " probably only a committee paper when they were designated, and before you ask, we wouldn't be able to track these down easily if at all since we have probably had several moves since designation, two changes of 'authority' etc and as you will realise, many were pre-computers! It is reasonable to say that, in most cases, we were working without any kind of conservation area statement. Mrs Jocelyn Sage Conservation Officer Unfortunately I can't help you. We have two conservation area documents for Sutton Veny, but they both date from the 1970s; nothing more recent than that has been deposited with us. Helen Taylor Local Studies Supervisor Wiltshire & Swindon History Centre

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| 172 | Beanacre | See attached SHLAA submission for land off the A350, Beanacre.   |
| 173 | Devizes  | RE: Notice of Intention to Consult on the Scope and Content of the Draft Wiltshire Housing Site Allocations DPD. Site at Caen Hill Farm, Devizes. With reference to the Wiltshire Housing Sites Allocations DPD currently being prepared by Wiltshire Council, we welcome the opportunity to respond during the consultation period. These representations are submitted on behalf of Waddeton Park Limited and we look forward to working with the Council as this plan develops. Scope of the Development Plan Document We support the Council in its desire to allocate land for development as housing and to meet the needs of the population through the allocation of sites. As a consequence of the appropriate increase in housing provision above that which was originally proposed in the Core Strategy, it is necessary to undertake a comprehensive assessment of sites for development in Wiltshire. The scope of the Allocations DPD should include the comprehensive consideration of the role and function of settlements across Wiltshire, so as to provide a proper understanding of their needs and requirements, as well as thoroughly |



considering the opportunities they provide for development. This assessment of development opportunities should be undertaken for each settlement using an agreed methodology which ensures that the role and particular circumstances of each place and are acknowledged. This will ensure that adequate sites are identified to meet the needs that exist and properly reflect the existing and future growth required at each of the towns. This bottom up approach should guide the figures for each of the towns and Community Areas, rather than the provision being artificially constrained by the indicative figures currently included in the proposed modifications. We welcome the intention to undertake a review of the settlement boundaries, in line with the recommendations of the Planning Inspector in correspondence with the local authority (December 2013). The Inspector specifically highlights the historic nature of the settlement boundary in the Kennet Local Plan (2004). A clear methodological framework for assessing settlement boundaries and sites promoted to the DPD should be set out early in the plan process. This methodology should be established early and Wiltshire Housing Sites DPD in collaboration with landowners, developers, agents and other interested parties to ensure that there is agreement of the approach and that it is also consistently applied when assessing sites. Devizes is identified as a market town within the tiers of settlements in the Core Strategy Pre Submission Document (February 2012). The market towns are identified as having the potential for significant development. In particular, the Devizes Area Strategy promotes the role of the town as a significant service centre and yet notes that there are no strategic housing sites allocated. The Housing Site Allocations DPD will allow a thorough review of Devizes and through consultation with developers, land owners and agents will assess the role that sites can play in meeting the housing requirements for Devizes and the wider East Housing Market Area. Land at Caen Hill Farm The site at Caen Hill Farm presents the opportunity to take forward a strategic site on the edge of the existing settlement. This is in accordance with the Core Strategy Sustainability Appraisal Addendum (February 2014) which states that there is a lack of available brownfield sites in Devizes and the majority of growth will need to be located on greenfield sites at the edge of the existing urban area. The site presents the opportunity to deliver residential development that will make a positive contribution the needs of Devizes, the main settlement in the East Housing Market Area, and to support the local economy. It is a deliverable site which would help to meet the requirement to deliver at least 437 additional units at Devizes over the plan period. In addition it could make a positive contribution to the five year land supply in the housing market area. The site is identified on the enclosed plan. It is a good and available strategic site which sits just outside the development limits. The site is located to the west of Devizes and comprises green fields and a cluster of farm buildings at the western boundary. At present, the site falls under the Kennet Local Plan and is located just outside the historic settlement boundaries. The settlement boundary should be extended to incorporate the Caen Hill site as a housing site for Devizes. For your information please note that we will be submitting the site formally to the call for sites process for consideration through the SHLAA. I trust that you find the information set out in this letter

satisfactory and the representations in relation to the Scope of the DPD and specifically on the site at Caen Hill Farm will be useful in the preparation of the Housing Sites Allocation DPD.

- 174      Beanacre      See attached SHLAA submission for land off Chapel Lane plot 3, Beanacre.
- 175      General -  
Barford St  
Martin      Ref: site S29 -Land at Mount Lane, Barford St Martin My wife and I, as owners of one of the oldest (and grade II listed) properties in Mount Lane, wish to object strongly to any possible development of the land directly opposite our cottage, for future residential use, for the following reasons: 1) This area of Barford st Martin is particularly attractive, with numerous thatched cottages and Grade 2 listed properties. It should also be taken into account that Barford St. Martin comes within the designated AONB. A modern development, however sympathetically done, cannot help but detract from the unique character and appearance of this part of the village. 2) Development here would rob the village of valuable amenity space. Village events are frequently held here (with full consent of the owners). Over the last 12 months these have included a dance, quiz night, village cream tea and our annual summer fete, which raise money for upkeep of the village and various community projects, as well being vital in maintaining the vibrancy and sense of community in our village. 3) The open aspect of the neighbourhood is a particular defining feature of this area of Barford St Martin, and any development in this area would completely destroy this characteristic. 4) The adverse effect of a development immediately opposite to numerous properties all of which are 100 s of years old, (and 3 of which are listed,) including our own cottage, Mount Cottage, Barford House, Primrose Cottage and Primrose Farm. 5) The loss of existing views from neighbouring properties would adversely affect the residential amenity of neighbouring owners. 6) The proposed density of the site at 11 properties is unacceptably high, although it is assumed this density applies to the entire field which at one time was under single ownership; the field is no longer such, and therefore only half the original area may possibly be available. A proposed development of say 5 properties would be completely out of keeping compared with existing development in the vicinity, which consists entirely of three and four bedroom character detached properties. 7) Mount Lane and Short Lane are narrow single carriageway country lanes, and already it is necessary to sometimes reverse up to allow vehicles to pass. When tankers deliver heating oil to the properties in the lanes, as they frequently do, it involves reversing and turning often with great difficulty to exit in the opposite direction. Even relatively small delivery vehicles (Tesco, Waitrose, Ocado) cause obstruction. 8) There is substantial concern regarding extremely restricted access to the proposed site (as explained in paragraph 7) and road capacity should a development go ahead. The residents of Barford St Martin are actively working on a Village Design Statement / Neighbourhood Plan to help with future planning. This is a long and time consuming piece of work which has been underway since October 2012. The plan specifically acknowledges that Barford is not ear-marked

for development and it will only support appropriate in-fill development. Nowhere on our Plans do we foresee developing on the land on Mount Lane which we see as essential to our neighbourhood for the aforementioned reasons. I do hope our Plans will be taken into consideration when considering such future developments. Any plans to develop this land will be met with the most vigorous resistance by the residents of Barford St Martin.

- 176 Holt Thank you for the opportunity to comment on the scope of this document. Holt Parish Council is in the process of developing a Neighbourhood Plan. This plan assumes retention of the current village development boundary (Village Policy Limits) for the reason that recent housing developments and identified opportunities for future development will far exceed identified community need. We also wish to preserve the current green spaces within and around the village. We are therefore resistant to a boundary review that would seem unnecessary. The old industrial sites in the North of the village form an Area of Opportunity identified under the District Plan for mixed use development. This policy has been carried forward in the emerging Core Strategy. Thirty seven new housing units have already been provided in this AOO and consultation is well advanced on the provision of approximately 80 more units. These proposed units will meet the identified needs within Holt for the foreseeable future and will make a major contribution towards the housing need for the wider Bradford on Avon Community Area. We are therefore opposed to further housing development within Holt.
- 177 General - Studley Re Scope & content of the draft Wiltshire HAS DPD This letter is in response to the councils consultation on the HAS process. It is my view that the boundary review and the allocation process must properly reflect the circumstances that existed before hamlets such as Studley was redefined as a large village. I understand that as an interim measure (until the core strategy is in place) some policies from the North Wilts local development plan were saved , for example, distinct Studley and Derry Hill boundaries. Also, in the Calne community areas action plan 2006-14 (updated in 2010) it was stated: It has also been agreed that the villages of Derry Hill, Studley and Heddington should receive only limited infill housing development appropriate for local housing needs. The scope of this review should cover the effect of housing site allocations will have upon rural hamlets, even if they have been redefined for planning purposes as a large village. The effect any housing has upon the scale and character of the hamlet must be addressed. I strongly believe that the boundary review must recognise and incorporate these policies. It should also recognise that large villages may compromise of distinct sections with intermediate boundaries and gaps that should also be respected.
- 178 General SCOPE OF THE WILTSHIRE HOUSING SITE ALLOCATIONS DPD 1. INTRODUCTION Following recent examination of the Wiltshire Core Strategy and the preliminary findings of the Planning Inspector (Andrew Seaman in December 2013), Wiltshire Council has

committed to an increase in housing numbers for its respective community areas and to the preparation of a Housing Site Allocations DPD as part of an updated Local Development Scheme (LDS). The Council is now inviting comments on the scope of the Housing Site Allocations DPD (deadline of 5 May 2014). This letter presents The Crown Estate's views on the approach to the DPD and identifies a number of sites for allocation in the plan.

2. COMMENTS ON APPROACH TO THE DPD

Details regarding the Council's approach to the DPD are limited at present, albeit that the Wiltshire Council website notes that: "Its [the DPD's] primary role is to support the delivery of housing growth set out within the emerging Wiltshire Core Strategy. The document will identify sufficient land (in the form of sites) across Wiltshire to provide surety of housing delivery over the plan period to 2026. "In addition to identifying sites for housing delivery, the document will review settlement boundaries, as defined in the emerging Wiltshire Core Strategy in relation to: the Principal Settlements of Salisbury and Trowbridge; Market Towns; Local Service Centres in the South Wiltshire Housing Market Area; and Large Villages. " We have the following comments in terms of the soundness of the Council's approach: In order to be consistent with national policy and ensure a positively prepared and effective plan, the Housing Site Allocations DPD should identify a range of deliverable sites for the first 5 years of the plan period plus developable sites for years 6-10 and 11-15 (NPPF paragraph 47). Allocating sufficient sites will be crucial to ensuring a robust housing trajectory for the plan period and the ability to maintain a rolling 5-year supply of sites. To ensure that the DPD is effective and deliverable, a range of sites should be allocated across a range of settlements (including towns, large villages and small villages) in order to meeting housing needs over the plan period, considering the role and function of settlements and local housing needs. At present the Council appears to suggest no allocations to small villages however allocations in such settlements could have an invaluable role to play in supporting the vitality of these communities in terms of responding to local housing needs and declining rural affordability, supporting local services and facilities and drawing on the local investment that new development can bring. In order for the DPD to be positively prepared, justified and effective, small villages should also therefore be considered for potential site allocations. In response to the findings of the Planning Inspector assessing the Core Strategy, the Housing Site Allocations DPD should be informed by a comprehensive and wide-ranging review of settlement boundaries: "... the Council has not reviewed the extent of the boundaries to inform the CS; instead relying upon the pre-existing development plan documents. Some of these were adopted some years ago, for example the Kennet Local Plan (2004), and it cannot be argued with great strength that the settlement boundaries contained therein are up-to-date for the purposes of the CS plan period" (Planning Inspector, December 2013). This will also need to be reflected as part of emerging Core Policy 2. In allocating sites for the Eastern HMA, the Council should be planning for at least 6,300 dwellings (not the 5,940 currently proposed via the Core Strategy modifications) to ensure that the DPD is both positively prepared and justified. A 6,300 dwelling requirement reflects the 15% of total housing provision for Wiltshire proposed for the Eastern HMA in the submitted

Core Strategl. Part of the Council's justification for constraining growth to the Eastern HMA relates to land availability, however The Crown Estate has a number of deliverable and developable sites considered favourably in the SHLAA. These sites could help the Council to meet its full, objectively assessed housing needs for the HMA as required by the NPPF (Refer Section 3).

- 179            Marlborough    3. THE CROWN ESTATE'S DELIVERABLE SITES IN THE EASTERN HMA Table 1 provides an overview of The Crown Estate's key sites in the Eastern HMA which we are proposing for allocation as part of the Housing Site Allocations DPD. All of these sites will have a valuable contribution to supporting the needs of local communities. Table 1 Sites for allocation in the Wiltshire Housing Site Allocations DPD (Appendix A for Site Plans) Infill development east of Elcot Lane/north of Chopping Knife Lane, Marlborough Overview This is a well contained 2.3ha site adjacent to Marlborough Tile Works and recent Crest Nicholson development essentially forming an infill to the existing urban area and would have minimal impacts on the AONB (Figure 1, Appendix A). Complemented by new strategic landscaping to the east, the site has potential for circa 60 dwellings with two potential points of access: via the existing Crest scheme or through works to Elect Lane. The Council's Core Strategy evidence base is clear that this is the key additional option for growth at Marlborough so we see this as a logical site for allocation in the DPD. Allocating the site would also protect against other less sustainable sites coming forward at the town. NPPF deliverability tests (availability, suitability, achievability and viability) The site is within the single ownership of The Crown Estate and is therefore available for development now. It is also in a suitable and sustainable location for development, supported by the Core Strategy evidence base and the precedent for residential development in this location already established. Lying adjacent to the Tile Works and Crest scheme the site would form an infill to the existing urban area. Whilst the Council previously identified access constraints for this site, improvements to Elect Lane have previously been agreed with WC Highways (Refer Appendix B) and an alternative access point exists via the Crest Nicholson scheme. As part of a sensitively designed scheme The Crown Estate would incorporate strategic landscaping to the east, new open space and ecological mitigation where required. The site is both achievable and viable with no constraints identified.
- 180            Burbage            3. THE CROWN ESTATE'S DELIVERABLE SITES IN THE EASTERN HMA Table 1 provides an overview of The Crown Estate's key sites in the Eastern HMA which we are proposing for allocation as part of the Housing Site Allocations DPD. All of these sites will have a valuable contribution to supporting the needs of local communities. Table 1 Sites for allocation in the Wiltshire Housing Site Allocations DPD (Appendix A for Site Plans) Sites at Burbage Overview Burbage is identified as a Large Village in the emerging Core Strategy, with the Council also having recognised the suitability and sustainability of the area having recently consented Persimmon's application for 45 dwellings. The Crown Estate has two well contained options that could meet longer term needs

and therefore be allocated in DPD (Figure 2, Appendix A): Saddlers Way: a 1 ha infill site adjacent to Persimmon's consented scheme with potential for a further 30 to 40 dwellings, with access to be provided via Saddlers Way (previously discussed and agreed with WC Highways). Land off Grafton Road/adjacent to Hirata site: The Crown Estate has two parcels of land comprising circa 2.5ha which could deliver a mix of uses, including new employment (the eastern site in particular), community uses and residential depending on local needs. NPPF deliverability tests (availability, suitability, achievability and viability) Both sites are within the single ownership of The Crown Estate and are therefore available for development now. Both sites are in a suitable and sustainable location, with Burbage identified as a Large Village in the emerging Core Strategy and consent recently granted for another residential scheme. Both sites are achievable and viable with no constraints identified.

181	Great Bedwyn	<p>3. THE CROWN ESTATE'S DELIVERABLE SITES IN THE EASTERN HMA Table 1 provides an overview of The Crown Estate's key sites in the Eastern HMA which we are proposing for allocation as part of the Housing Site Allocations DPD. All of these sites will have a valuable contribution to supporting the needs of local communities. Table 1 Sites for allocation in the Wiltshire Housing Site Allocations DPD (Appendix A for Site Plans) Brown's Lane, Great Bedwyn Overview This is a well contained 0.5ha residential infill site with potential for up to 15 dwellings to help support local housing needs (Figure 3, Appendix A). Great Bedwyn is identified as a Large Village in the emerging Wiltshire Core Strategy and is a sustainable location benefiting from rail access and a range of local services and facilities. NPPF deliverability tests (availability, suitability, achievability and viability) ☿ The site is within the single ownership of The Crown Estate and is therefore available for development now. ☿ It is also in a suitable and sustainable location for development. ☿ The site is both achievable and viable with no constraints identified.</p>
182	Bromham	<p>3. THE CROWN ESTATE'S DELIVERABLE SITES IN THE EASTERN HMA Table 1 provides an overview of The Crown Estate's key sites in the Eastern HMA which we are proposing for allocation as part of the Housing Site Allocations DPD. All of these sites will have a valuable contribution to supporting the needs of local communities. Table 1 Sites for allocation in the Wiltshire Housing Site Allocations DPD (Appendix A for Site Plans) Land off Breach Close/Horsepool, Bromham Overview The Crown Estate has worked with Bromham Parish Council to develop two options for meeting local housing needs in Bromham Parish which could deliver 30-50 dwellings and a range of other benefits, including improved footpath connections through the village (alongside lighting), new village green, new bus stops and new footpaths along Horsepool. Figure 4, Appendix A, shows the two site options ('A' for circa 30 dwellings plus a further 20 dwellings on 'B'). As well as meeting housing needs and delivering community benefits, the site is in a sustainable and suitable location with a range of facilities (Bromham is a Large Village in the emerging Core Strategy) and the existing settlement boundary is already in need of review in this location following recent residential development off</p>

		Breach Close. NPPF deliverability tests (availability, suitability, achievability and viability) Ć The site is within the single ownership of The Crown Estate and is therefore available for development now. Ć It is also in a suitable and sustainable location for development. Ć The site is both achievable and viable with no constraints identified.
183	Bishops Canning	3. THE CROWN ESTATE'S DELIVERABLE SITES IN THE EASTERN HMA Table 1 provides an overview of The Crown Estate's key sites in the Eastern HMA which we are proposing for allocation as part of the Housing Site Allocations DPD. All of these sites will have a valuable contribution to supporting the needs of local communities. Table 1 Sites for allocation in the Wiltshire Housing Site Allocations DPD (Appendix A for Site Plans) Court Farm, Bishops Cannings Overview This 1 ha previously developed infill site has potential to deliver up to 15 new homes (Figure 5, Appendix A) to meet local needs alongside related transport benefits for this part of the village (e.g. by removing the need for large agricultural vehicles to route down The Street). NPPF deliverability tests (availability, suitability, achievability and viability) Ć The site is within the single ownership of The Crown Estate and is therefore available for development now. Ć It is also in a suitable and sustainable location for development. In designing a scheme for the site careful consideration will be given to the site's setting and relationship to the adjacent conservation area, church and wider AONB. Ć The site is both achievable and viable with no constraints identified.
184	Cricklade	In preparation of the Wiltshire Housing Site Allocations Development Plan Document I would be most grateful if you are able to give consideration to the allocation of land at Stones Farm, Cricklade. This land has previously been assessed as part of the Strategic Housing Land Availability Assessment (SHLAA) and given the reference number 696. We are writing on behalf of the owners to re-iterate that the land at Stones Farm is available for redevelopment, and is considered to be suitable for residential uses. It is located immediately adjacent to existing residential development in Cricklade, and clearly lies in sustainable location with easy access by foot to services and facilities in the town centre. Part of the land at Stones Farm represents infill development and our client reserves the right to bringing this forward in the short term, as it is believed that this would be in accordance with Local Planning Policy. If of assistance, we would be pleased to provide further details demonstrating that land at Stones Farm could be brought forwards in the short to medium term.
185	Donhead St Andrew	See attached SHLAA submission for land to the east of Overway, Donhead St Andrew.
186	Donhead St	See attached SHLAA submission for land to the west of Overway, Donhead St Andrew.

Andrew

- 187      Warminster      Wiltshire Housing Site Allocations DPD Representations on behalf of Green Square Limited Site at Grovelands Way, Warminster  
We have been instructed by Green Square Limited who control some 11.9 hectares of land at Grovelands Way, Warminster which they consider eminently suitable for residential development. We have been instructed to submit representations in respect of the Housing Site Allocations DPD. With regards the scope of the DPD, we consider that the guidance in the NPPF should be adhered to in terms of site selection. In that context the DPD should identify a supply of 'deliverable' sites which can contribute towards not only meeting the overall housing requirement for the respective housing market area but also the 5 year supply of deliverable sites. To be considered deliverable, sites should be available now, offer a suitable location for development and be achievable with a realistic prospect that housing will be delivered on the site within five years. Furthermore, it is essential that the development of the site is viable. The DPD should require evidence from site promoters on the viability of their site. The site which Green Square controls at Grovelands Way, Warminster is not only available but is suitable and achievable within 5 years. It also represents a viable development opportunity and we have confirmed this in representations separately made to the SHLAA call for sites. We trust that these comments will be taken into consideration and we look forward to taking part in forthcoming consultations in respect of this DPD. If in the meantime you require any additional information about the site then do not hesitate to contact us.
- 188      Salisbury      Wiltshire Housing Site Allocations DPD Representations on behalf of Bovis Homes Limited Site at Netherhampton Road, Salisbury  
We have been instructed by Bovis Homes Limited who control some 79 hectares of land at Netherhampton Road which they consider eminently suitable for residential and employment development. Indeed, the site has previously been identified as both a Strategic and Reserve Allocation in the emerging South Wiltshire Core Strategy. This confirms the suitability of the site for mixed use development. We have been instructed to submit representations in respect of the Housing Site Allocations DPD. With regards the scope of the DPD, we consider that the guidance in the NPPF should be adhered to in terms of site selection. In that context the DPD should identify a supply of 'deliverable' sites which can contribute towards not only meeting the overall housing requirement for the respective housing market area but also the 5 year supply of deliverable sites. To be considered deliverable, sites should be available now, offer a suitable location for development and be achievable with a realistic prospect that housing will be delivered on the site within five years. Furthermore, it is essential that the development of the site is viable. The DPD should require evidence from site promoters on the viability of their site. The site which Bovis Homes controls at Netherhampton Road is not only available but is suitable and achievable within 5 years. It also represents a



viable development opportunity. Bovis Homes will confirm this in representations separately to the SHLAA call for sites. We trust that these comments will be taken into consideration and we look forward to taking part in forthcoming consultations in respect of this DPD. If in the meantime you require any additional information about the site then do not hesitate to contact us.

189      Chapmanslade

Thank you for your email of 20th March 2014 inviting comments on the proposed scope of the Wiltshire Housing Site Allocations DPD. I understand that it is proposed that the DPD will have two key purposes, namely (i) to identify housing sites to achieve the delivery of housing growth set out within the emerging Wiltshire Core Strategy, and (ii) to review settlement boundaries in various settlements including 'Large Villages'. The scope of the document, as defined, is considered appropriate. This practice acts for Aedifico Limited which owns the Green Farm Industrial Estate and adjoining land ("the site") in the village of Chapmanslade, West Wiltshire. The site lies outside but immediately adjacent to part of the settlement boundary of Chapmanslade which is identified as a 'Large Village' in the emerging Core Strategy. With regard to the emerging Housing Site Allocations DPD, my client proposes (i) the allocation of the site for housing purposes, and (ii) the realignment of the settlement boundary of Chapmanslade to include the site. A drawing, numbered AL(1)03A, is attached. This identifies the site in relation to the existing settlement boundary, and also shows the suggested alteration to the settlement boundary to include the site.

**Site Description** The site is located on the south side of High Street, Chapmanslade, and is occupied by a number of light industrial buildings collectively known as the Green Farm Industrial Estate. The buildings are former agricultural structures which were converted to light industrial use during the mid-1990s. They are of utilitarian design, and are served by an extensive area of concrete hardstanding and car parking. The site also includes a converted residential barn located to the rear of Green Farm Cottages. These cottages front High Street, and lie within the settlement boundary. Vehicular access to the site and to the adjoining residential accommodation at Green Farm is provided by a shared entrance from High Street. The village of Chapmanslade has a predominantly residential character with various supporting community facilities. Frontage housing is found directly opposite the site on the north side of High Street, as well as to the east of the site on both sides of the road. Further residential development forming part of the village is found to the west of the site beyond a short gap in frontage development on the south side of the High Street. The site is therefore located centrally within the village of Chapmanslade, and forms part of the village in both visual and functional terms. Planning permission was granted on 20th June 1995 under reference W95/0436 for the change of use of redundant farm buildings to industrial units. Prior to this time, the site formed part of a farm, and its exclusion from the defined village settlement would have been appropriate. The proposed housing site allocation The site offers only a very basic standard of business accommodation with poor quality employment space, a low

standard of supporting facilities, poor security, and shared access arrangements with adjacent residential accommodation. Employment use is considered to be unsustainable in this location as it is entirely dependent on private road transport for both employee commuting and for servicing and deliveries. The existing commercial buildings are of utilitarian design, and both these and the associated parking area are exposed to long views from the south over open countryside which forms part of a Special Landscape Area. This exposure is accentuated by the raised position of the site. The site has been put forward for residential use in response to the SHLAA 'Call for Sites'. The site is deliverable and developable for housing, and could accommodate up to 10 dwellings. Residential development would assist in meeting identified housing needs within the Warminster Community Area. Residential use would also be entirely compatible with the established character of the surrounding area, and would offer opportunities for the substantial visual enhancement of both the site and the wider setting through high quality design and site screening. Additional housing would also support existing and new community facilities within the village. The site comprises previously developed land (PDL). The NPPF encourages the effective use of PDL provided that it is not of high environmental value. It also promotes the residential development of land in commercial use where there is an identified need for housing provided that there are not strong economic reasons why such development would be inappropriate. No such strong reasons are considered to arise in this case for the reasons set out above. The Planning Authority is therefore urged to allocate the site for housing purposes. The proposed alteration to the settlement boundary The site clearly forms part of the village of Chapmanslade in all respects other than planning status. This applies to both the commercial plot and to the converted barn located to the rear of Green Farm Cottages. The site forms a contiguous part of established development fronting the south side of this part of High Street, and its exclusion from the defined settlement area is now illogical. The historical use of the site for agricultural purposes ceased many years ago. The inclusion of the site within the village settlement limits is therefore considered appropriate in planning terms, and reflects both its established brownfield status and its physical relationship with adjacent development located within the defined settlement boundary. The suggested adjustment to the settlement boundary, as shown on attached drawing AL(1)03A, precisely follows the curtilage boundary of the developed plot. The Planning Authority is therefore urged to adjust the settlement boundary of Chapmanslade to include the site within this 'Large Village'. If you require any additional information or clarification at this stage, please contact me. In the meantime, kindly acknowledge safe receipt of this email.

- 190 Calne See attached SHLAA submission for land at Marden Court, Calne.
- 191 Chippenham See attached SHLAA submission for Saltersford Lane, Chippenham.

- 192      General -      I understand there is a discussion underway for planning for the field the end of marden way. As i assume you already  
Marden Way      understand with the new houses and existing on wen hill heights and the close areas, traffic is already a nightmare and cars are  
everywhere, with the possibility of another 60homes being built it would be chaos. wen hill lane is only a footpath, and with  
illegal parking at the moment already restricting residents getting to there homes the point is proven. i look forward to hearing  
from you!
- 193      General -      Please find attached [below] a letter in support of the Action Group of Studley against the building of housing on Blounts  
Studley      Court. Unless something major is done with the junction at the cross roads there is going to be huge problems. I tried crossing  
the road this week at 9.30am to go from Studley to Derry Hill; I had to wait for well over 70 vehicles to pass on the A4 before I  
could cross there was a number of us waiting in the same queue. If further housing is put on Studley side of the A4 this will  
increase further the traffic trying to get across, it will also increase the danger for children who live on Studley side crossing to  
go to school. I would like to be told when we, Studley were classed as a large village. We have lived in Studley since 1983, it was  
classed as a Hamlet then and at no time since have we received information telling us that this classification has changed. Were  
Studley residence ever asked if they wished to be joined with Derry Hill, I think not? Letter: Reference: Response to  
Consultation: Scope and Content of the Draft Wiltshire Housing Site Allocation Process (HSAP) DPD I am writing in response to  
the Council's consultation on the HSA process. I feel that the scope of this document and process must cover the practical and  
environmental effects of housing site allocations within rural hamlets even when these hamlets have been aggregated for other  
purposes into larger groups and have become, for administrative purposes, defined as a large village for planning purposes.  
An excellent example is Studley which is a separate small hamlet with a distinct character of its own. There are many other  
similar examples in the area covered by the Draft Wiltshire HAS DPD. It appears that, as part of the HAS DPD these settlement  
boundaries will be reviewed. However there appears to be some inconsistencies between the two sections of the core policy  
shown below: Para 4.13: These settlement boundaries will be reviewed as part of the Wiltshire Housing Site Allocations and  
Chippenham Site Allocations DPDs, as set out in the Council's Local Development Scheme, in order to ensure they are up to  
date and can adequately reflect changes which have happened since they were first established. Para 4.15 These settlement  
boundaries will also be reviewed as part of the Housing Site Allocations DPD as set out in the Councils Local Development  
Scheme, in order to ensure they remain up to date and properly reflect building that has happened since they were first  
established. I am personally very concerned that the definition used in 4.15 is adopted, and that physical changes only are used  
in the boundary review " rather than the policy change to define two previously physically separated areas as one. The effect  
of combining two areas of very different character, topography and layout even if adjacent, can have profound detrimental

effects to the hamlet involved.

- 194      General -  
Barford St  
Martin      Ref. site S29 - Land at Mount Lane, Barford St. Martin. The possible development of this land on Mount Lane, Barford St. Martin, for future residential use has just come to my attention. As a neighbour of this land, I wish to raise a number of objections. When we purchased our property 15 years ago, we were led to believe that this paddock would not be developed because the open aspect of our neighbourhood was a defining feature of the village. Short Lane and Mount Lane are particularly attractive with thatched houses and cottages and Grade 2 listed properties. Any modern development, however sympathetically done, cannot help but detract from the unique character and appearance of this part of the village. I am very concerned about the loss of the existing view from my property, and a number of other properties will be similarly affected. Equally, the setting of such listed buildings as The Old Cottage and Barford House will be compromised. The site is in fact in multiple ownership, and a building density of 11 properties, even if it was on the whole area, is unacceptably high. It is totally out of keeping with the properties in this area, which are detached, and in many cases with large gardens. Both Short Lane and Mount Lane are narrow single carriageway country lands with very limited capacity. Such a development raises serious questions about access and road safety. While the village no longer has a school, there is an active nursery in the old school building. There is no footpath, and parents going from any new development would have to walk in the lanes. Over the last few years, there has been a determined effort to encourage the local community spirit. This land is a valuable amenity space, and village events have been held there to this end. These have included a dance, quiz night, village cream tea and the annual summer fete. While these have raised money for the upkeep of the village and various community projects, they have also made a significant contribution to village cohesiveness and encouraged friendships. As you will no doubt be aware, village residents are actively working on a Village Design Statement / Neighbourhood Plan to help with future planning. This is a long and time consuming piece of work which began in October 2012. The plan specifically acknowledges that Barford is not earmarked for development and in fact will only support appropriate in-fill development. Nowhere in our plans do we foresee any development on Mount Lane. I respectfully ask you to give full weight to the concerns of the local residents and what they consider to be suitable for the future development of their village.
- 195      General      I have the following comment to make in representation on the Wiltshire Housing Site Allocations DPD. Action on the Wiltshire Housing Site Allocations DPD should be deferred until there is evidence of inward investment into Chippenham by business/commercial/entertainment entities. The town has long since outgrown its capability to sustain its local population and/or offer an attractive quality of life. No meaningful policy or planning can be undertaken until such investment is in place.

196 Malmesbury See attached SHLAA submission for land at Nurdens Garden Centre, Malmesbury. Nurdens Garden Centre, Crudwell Road, Malmesbury In line with the above, it is considered that Nurdens Garden Centre site should be positively considered by Wiltshire Council as part of the 'call for sites' for the Allocations DPD. The site is not within or adjacent to the settlement boundary of Malmesbury, but is within the urban fabric of the settlement and within a sustainable reach of its services and facilities. The details of the site are highlighted below.

**Site and Surrounding Area Site Context** The site, which is currently operating as Nurdon's Garden Centre, is located to the east of Crudwell road. The site is approximately 4.2 hectares and at least half of the site can be described as previously developed 'brownfield' land due to its existing use as a garden centre. The site is bound by Crudwell Road to the west with residential properties beyond, hedgerow to the north and east, beyond which is open countryside. To the south there is a farm and residential properties. The site is allocated in the North Wiltshire Local Plan 2006 as employment land; this allocation has been maintained also in the emerging Core Strategy. A planning application was recently submitted (N/11/04092/OUT) on the site for the following: Full Details For the Demolition of Existing Buildings & Construction of a Foodstore, Associated Customer Car Park, Petrol Filling Station & Associated Highway Works; Together With Outline Details for the Provision of a Builders Merchants & Premises for Employment Use (B1 & B2 Use Classes) The site is outside of any environmental or historical designation' Whilst the application was refused on principle, the application was accompanied by a full and robust application package which demonstrated that there are no technical constraints on site. The site does not have any archaeological, archaeological or hydrological constraints and it is outside of any environmental designations.

**Surrounding Area** In terms of the immediate vicinity, there are a number of residential properties in close proximity, including those along Crudwell Road adjacent and opposite the site, and those along the B4014 to the west, and Charlton Road to the south of the site. The site is located on the outskirts of Malmesbury which is defined as a Market Town in the emerging Core Strategy. The Core Strategy highlights that Market Towns have the ability to support sustainable patterns of living in Wiltshire through their current levels of facilities, services and employment opportunities. It also states that Market Towns have the potential for significant development that will increase the jobs and homes in each town in order to help sustain and where necessary enhance their services and facilities and promote better levels of self containment and viable sustainable communities. It is clear from this that Malmesbury is a sustainable location with many services and facilities, where development will be supported. The site is approximately 0.8 miles from the centre of Malmesbury and is therefore accessible by walking and cycling. The nearest bus stops are along Charlton Road approximately 350m to the south of the site; these provide a 2 hourly service to Malmesbury, Wootten Bassett and Swindon Monday to Saturday (service 31).

**Developable and Deliverable** The National Planning Policy Framework (the Framework) states that for sites to be considered 'developable' they should be in a suitable location for housing development and there should be a reasonable prospect that the site is available

and could be viably developed at the point envisaged. To be considered 'deliverable' the Framework requires sites to be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the within five years and in particular that development of the site is viable. In respect of the submission site, those tests are addressed as follows. Available The site is in single ownership and it is currently underutilised in its current form. The site has no significant constraints which would delay commencement of development. Accordingly, there is full control and flexibility to release the land for residential development. Suitable The site has no significant development constraints, as identified above. In addition, the site is suitably and sustainably located for development with good accessibility to local services and employment opportunities by sustainable modes of transport. As above, Malmesbury is a Market Town and it is therefore recognised as a sustainable and suitable location for development. The Core Strategy recognises that between 2006 to 2026, approximately 1,395 new homes will be provided of which about 885 should occur at Malmesbury. Approximately 510 homes will be provided in the rest of the community area. There is therefore an evident need for housing across the Malmesbury Community Area, and not just in the centre. The site is allocated for employment land and has been since the North Wiltshire Local Plan was adopted in 2006. The NPPF is clear at Paragraph 22 that 'planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. Land allocations should be regularly reviewed.' It goes on to state that 'where there is no reasonable prospect of a site being used for the allocated employment use, applications for alternative uses of land or buildings should be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable local communities.' In this regard, given its allocation for some time, the protection of this site for employment purposes is not in line with the NPPF, and other uses must be considered on their merits. In this case, market intelligence has highlighted that the site is attractive and deliverable for residential use. In addition to this, the employment needs of Malmesbury have been addressed elsewhere by the expansion of the existing Dyson factory. As such, residential use on the site must be considered on its merits. In line with the above, there is an evident need for housing in Wiltshire and this site presents an opportunity to meet this need in a sustainable location. There are no environmental designations covering the site, and the site is not at risk of flooding. The site is also partly brownfield which is a material consideration which weighs in favour of this site. Achievable Malmesbury is an attractive settlement with an evident housing need. Market analysis has also indicated that the site in particular would be an attractive site for residential development. As such, development on the site represents a viable development option which can be delivered quickly. Conclusion In summary, it is considered that the scope of the Site Allocations DPD should include a wider search of all sites with inherent sustainable characteristics to ensure the Council's housing requirement of 'at least 42,000 dwellings' over the plan period is achieved. It is therefore suggested that the

Allocations DPD is sufficiently flexible to consider all sites across the district in close proximity to sustainable settlements, that are not necessarily inside or adjacent to settlement boundaries. An example site is Nurdens Garden Centre, Crudwell Road, Malmesbury. The above assessment demonstrates that the site is suitable for residential development, and that the long term protection of the site for employment purposes should be prevented. The site is available, suitable, viable and achievable; as such, the requirements of the Framework, in terms of being developable and deliverable, are satisfied. The site is on the outskirts of Malmesbury, an attractive Market Town which benefits from a range of key services and good public transport links. The land is well placed to accommodate housing growth in a sustainable manner that will not compromise the character of the settlement or surrounding landscape. There are no constraints on site that would delay commencement of development. It is therefore respectfully requested that the Council consider the merits of this site for housing as part of its 'Call for Sites' for the emerging Development Plan Documents that will form part of the LDF.

- 197      Nr      See attached SHLAA submission for land south east of Wincombe Business Park, Shaftesbury. On behalf of Barratt David Wilson Shaftesbury Homes, please find attached details of land at the above location, in response to Wiltshire Council's recent SHLAA 'Call for Sites' exercise and consultation on the scope of the Wiltshire Housing Site Allocations Development Plan Documents (DPD). Site location The proposed site comprises agricultural land in the far south west of Wiltshire, adjoining the boundary of North Dorset District, on the fringes of Shaftesbury. It is situated adjacent to the Wincombe Business Park, and the established residential area of eastern Shaftesbury known as Ivy Cross. Proposals and key issues As the accompanying form and map set out, it is proposed that an area of approximately 2.5 hectares is brought forward for development of around 50-75 dwellings, on a roughly triangular area of land adjoining Wincombe Park. The land adjoins an area allocated for housing development in the emerging North Dorset Local Plan. The key factors in bringing the site forward would include the following: Relationship with Shaftesbury. Though located within the parish of Donhead St. Mary, the site has no direct relationship with that village (this being approximately 3km to the east of the site), nor with any other village or hamlet within Wiltshire. Rather, in physical terms the site adjoins the built up edge of Shaftesbury, and is capable of being integrated fully within the established urban area. Landscape. The site occupies the same plateau as Shaftesbury, which in landscape terms is quite distinct from the upper valleys of the River Nadder and its tributaries further east. The key transition between these two areas lies a considerable distance to the east of the site (around Higher Wincombe Farm), where the plateau falls away steeply from around 220m AOD to around 150m AOD in series of steep wooded hillsides. This change in landscape character corresponds with the boundary of the Cranborne Chase and West Wiltshire Downs AONB. Nonetheless care would be taken in matters such as building scale, materials and boundary vegetation to ensure no adverse impacts on the surrounding countryside. Shaftesbury Eastern Bypass.

It should be ensured that sufficient land remains available to secure this proposed link road if funding for it becomes available. Land is safeguarded by the two authorities for this purpose in saved Development Plan policy, with the relevant areas being identified in the accompanying plan. It is noteworthy that on the North Dorset side the safeguarded area comprises a linear strip, whereas on the Wiltshire side it comprises a broad area. It is assumed that any future road on the Wiltshire side would comprise a direct extension of the strip on the North Dorset side, rather than requiring the full area safeguarded by Wiltshire Council. The proposed site is shaped accordingly. Phasing of development. Barratt David Wilson Homes are promoting land to the south of the site through the North Dorset Local Plan process, as an extension of previous allocations further south. Completions on the proposed site in Wiltshire are therefore assumed to be phased approximately 4-7 years from now, as a continuation of these other sites. Rationale for development We consider that the proposed site represents an appropriate candidate for allocation within Wiltshire Council's emerging Site Allocations DPD for a number of reasons. Inherent sustainability of the site. The site is located adjacent to Shaftesbury which is a sizeable market town of around 7,000-8,000 population, benefiting from a diverse range of public services, retail, employment, industry, and public transport links. Future residents of the proposed site would benefit from access to these facilities, reducing the need for travel by private car. Lack of constraints on the site. The site is accessible, developable, and subject to no particular designations in respect of ecology or cultural heritage. The site is located within a Special Landscape Area (SLA) under the Salisbury District Local Plan 2003. However, rather than signalling the need for restraint on this site, conversely the SLA designation signals that the site is relatively unconstrained. This is because the SLA designation is of lesser importance and sensitivity than the Cranborne Chase and West Wiltshire Downs AONB, which the entirety of the Tisbury Community Area (except for the fringes of Shaftesbury in the area around this site) is encompassed by. Figure 5.18 of the draft WCS illustrates this point, and indicates that in landscape terms the fringes of Shaftesbury are the least sensitive part of the Tisbury Community Area. Requirement for housing in this Community Area. In the latest modifications to the Wiltshire Core Strategy (WCS) a total of 161 dwellings are still required to be identified within the Tisbury Community Area, in the surrounding areas outside of Tisbury itself, between now and 2026. Absence of alternatives in the Community Area. With the proposed removal of settlement boundaries at 'Small Villages', it is implicit that the majority of the 161 dwellings required would need to be accommodated at that 'Large Villages' of Fovant, Hindon and Ludwell. However, the WCS also proposes that housing developments should not normally exceed 9 dwellings in size. Furthermore each of these three villages are significantly constrained by their AONB location, Conservation Areas, and other factors. Previous SHLAA exercises have yielded very few suitable sites within these villages. In light of these factors, we consider that in the absence of a significant site at Shaftesbury there will be great difficulty in bringing forward the approximately 161 dwellings sought in the area by 2026. Summary In summary, development of 50-75 dwellings on this site



would contribute significantly towards the identified housing requirement in Tisbury Community Area in a location that is deliverable and sustainable, and in various respects more suitable than village-based alternatives. We therefore request that Wiltshire Council: gives positive consideration to the site through the SHLAA process; takes account of the site and the wider opportunities of eastern Shaftesbury in the emerging Site Allocations DPD; works closely with Barratt David Wilson Homes in the formulation of proposals for the site; works with North Dorset District Council in respect of a combined allocation for the area, mindful of the statutory 'duty to co-operate'. I trust that this is an informative update on the site and look forward to working with officers in developing the concept of this proposal further.

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| 198 | Semley          | See attached SHLAA submission.   |
| 199 | Wilton          | See attached SHLAA submission.   |
| 200 | West of Swindon | In response to the notice seeking initial comments on the scope of the above document, we respond on matters of principle on behalf our client, Primegate Properties (Hooksouth) Limited. These comments are made in the context of representations submitted by Primegate Properties (Hooksouth) Limited on the emerging Wiltshire Core Strategy, with respect to the promotion of Land North of M4 (SHLAA Site 2042), west of Swindon, for potential mixed use development including employment and housing land. At this stage we believe that it would be premature to limit the scope of the DPD and the settlement boundary review to the geographical locations specified; the plan period specified; and to the consideration of housing land in isolation of employment land provision. We believe that a wider scope of study would be necessary to appraise and identify the most sustainable development option available to accommodate the development needs and aspirations of both Wiltshire and adjacent authorities, including Swindon Borough. Our comments are made in the context of the uncertain status of both the emerging Wiltshire Core Strategy and the Swindon Local Plan 2026, both of which are yet to confirm the strategic development context for the Site Allocations DPD, including but not limited to the capacity of settlements to accommodate growth in a sustainable manner and to fulfil the 'Duty to Cooperate'. In addition we reiterate our comments that the Wiltshire Core Strategy should reflect a plan-led approach to development west of Swindon by recognising and providing for existing and proposed development. Finally we note that Strategic Environmental Assessment and Sustainability Appraisal is required which justifies the policy option. |
| 201 | Malmesbury      | This representation is made on behalf of the land owner of the above site and comments on the proposed scope of the Wiltshire Housing Site Allocations Development Plan Document. This letter also provides details of the land at Nurdens Garden  |

Centre, Crudwell Road, Malmesbury, to be considered by the Wiltshire Council as part of the on-going 'Call for Sites'. It is considered that the above site has potential for residential development and this letter provides details of the site. A completed version of the Sites Submission Form is also enclosed. The Council has highlighted that the scope of the proposed Site Allocations DPD covers two key matters. Its primary role is to support the delivery of housing growth set out within the emerging Wiltshire Core Strategy; it therefore will identify sufficient land (in the form of sites) across Wiltshire to provide surety of housing delivery over the plan period to 2026. In addition to this, the document will review settlement boundaries, as defined in the emerging Wiltshire Core Strategy in relation to: the Principal Settlements; Market Towns; Local Service Centres in the South Wiltshire Housing Market Area. Wiltshire Core Strategy The Allocations DPD's role is to support the delivery of housing growth set out in the emerging Core Strategy. In terms of the housing growth set out in the Core Strategy, it is proposed that development is directed at four tiers of settlements which include Principle Settlements, Market Towns, Local Service Centres and Large and Small Villages. Core Policy 2 sets out the housing requirement of the District which is 'at least 42,000 homes'. The policy goes on to state that 'this will be delivered in a sustainable pattern in a way that prioritises the release of employment land and the reuse of previously developed land to deliver regeneration opportunities, and to limit the need for development on Greenfield sites, with approximately 35% of development taking place on previously developed land.' In terms of the location of new development, it states that outside the defined limits of development (settlement boundaries), other than in certain circumstances, development will not be permitted. These circumstances include: Additional employment land (Core Policy 35) Military establishments (Core Policy 37) Development related to tourism (Core Policies 39 and 40 Rural exception sites (Core Policy 44) Specialist accommodation provision (Core Policies 46 and 47) Supporting rural life (Core Policy 48) However, it does go on to highlight that the limits of development may be altered through the identification of sites for development, subsequent site allocations and neighbourhood plans. The above approach of the Core Strategy to locate development towards sustainable settlements is supported. However, it is contended that the Allocations DPD needs to be sufficiently flexible to consider all sites across the district in close proximity to sustainable settlements, that are not necessarily inside or adjacent to settlement boundaries. Whilst the emerging Core Strategy at present doesn't look to encourage large scale development beyond settlement boundaries, it does encourage the effective use of brownfield land within Core Policy 2. This is also encouraged by the National Planning Policy Framework; one of the core principles is to 'encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value'. The emerging scope of the Site Allocations DPD doesn't appear to allow for brownfield sites outside the settlement sites to be considered as part of the process. The current scope could result in the LPA losing the opportunity to identify and allocate other individual brownfield sites where sustainable development can be delivered. This representation seeks to ensure that the scope

of the Allocations DPD is broadened to ensure that other suitable sites with inherent sustainable characteristics are considered as part of the 'call for sites' process.

- 202 Yarnbrook See attached SHLAA submission.
- 203 Hilperton Wiltshire Core Strategy Proposed Modifications Consultation / Scope of Housing Site Allocations DPD / Call for Sites Land at The Grange, Devizes Road, Hilperton, BA14 7QY I refer to the various consultations that are currently taking place in relation to the Wiltshire Core Strategy, namely: . Consultation on Schedule of Proposed Modifications . Scope of the Wiltshire Housing Site Allocations DPD . Call for Sites LPC represent the owner of land at The Grange, Devizes Road, Hilperton which we consider is entirely suitable for residential development (and indeed will greatly assist the Council in meeting its Housing Supply requirement). A Site Location Plan identifying the boundary of the subject land is appended to this correspondence. Given the interrelationship between all the above consultations I feel it will be far more purposeful to submit one holistic document, hence this submission. I will therefore first of all make appropriate comments on the Schedule of Proposed Modifications, thereafter comment on the Scope of the Wiltshire Housing Site Allocations DPD and finally reaffirm the status of this site as being suitable for residential development through the Call for Sites. Scope of the Wiltshire Housing Site Allocations DPD Given the above analysis it is clear that a fundamental principle of the DPD is to review settlement boundaries to bring forward suitable sites to meet the housing land supply requirement. In the course of preparing the Core Strategy the Council has already undertaken extensive work, through the SHLAA process, and has identified through a scoring mechanism those sites that are highly suitable for residential development (with the only hindrance being a location just outside a current settlement boundary). It is highly reasonable that those sites that have scored the highest in the SHLAA process to date should be given priority in the search for additional suitable housing sites. Call for Sites As indicated at the outset I wish to reaffirm the strong commitment of the owner of the land at The Grange, Devizes Road, Hilperton to bring forward this land for residential development. The land is already identified in the SHLAA as Site Reference 291 where under the detailed assessment of the SHLAA analysis Potential Suitability Constraints are defined as none and under Suitability the assessment is suitable. Most importantly in 2008 the Council notified the landowner that the site been assessed as Priority 1 (the top band / most suitable sites). In order to assist the Council as it reviews the settlement boundary for Hilperton through the DPD process I would like to share with you the following site analysis information we have prepared. The purpose of supplying this information to you is to robustly demonstrate that the Council's analysis in identifying this as a Priority 1 SHLAA site is entirely accurate and provide the Council with clear evidence that a reasonable level of new housing can be achieved on the site. I am therefore pleased to

supply the following analysis documents: . Site Location Plan . Design Concepts and Site Constraints . Illustrative Proposed Site Layout . Landscape Capacity Appraisal . Extended Phase 1 Habitat Survey As you will see from the submitted documents the envisaged development would be a scheme of 30 dwellings at a gross density of 24 dph. Given the characteristics of the locality it is considered that a density in this region will be appropriate. Furthermore, the illustrative information supplied demonstrates how a high quality design / layout can be achieved taking into the need to protect / enhance landscape & ecology factors. Finally, the Landscape Capacity Appraisal reinforces the Council's view that this site is entirely capable of accommodating new residential development without any significant harm accruing to the character of the locality. In summary I do trust this comprehensive response is of assistance to the Council in producing a sound Core Strategy and thereafter producing a suitable Housing Site Allocations DPD that will amend the settlement boundary at Hilperton to facilitate residential development on this SHLAA Priority 1 site. Should you wish to discuss any of the contents of this representation or the documents supplied please do not hesitate to make contact.

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| 204 | Heywood   | See attached SHLAA submission.   |
| 205 | Yarnbrook | See attached SHLAA submission.   |
| 206 | Corsham   | I am pleased to enclose details for land to the north of 16 Bradford Road, Corsham, to be considered as part of the Wiltshire Housing Site Allocations DPD process. As requested I have attached the completed SHLAA form and site plan.   |
| 208 | Ramsbury  | See attached SHLAA submission for Ramsbury Glebe: Land North of Whittonditch Road, Ramsbury. In the case of Ramsbury Glebe, put forward for your consideration through the "call for sites" process, we consider that this is a site that is well related to the village, can include new community infrastructure and has the opportunity not only for a sensitive development in the landscape but has the capacity for positive improvements to green infrastructure, access and landscaping. |
| 209 | Colerne   | Please find attached a copy of your pro forma and covering letter promoting the suitability of the above site for residential development. I have also included a site location plan for identification purposes. I trust this is of assistance. However, should you require anything further, please do not hesitate to contact me.   |
| 210 | Ramsbury  | I am writing on behalf of The Salisbury Diocesan Board of Finance in response to your consultation on the proposed Wiltshire Site Allocations Development Plan Document. You have asked for views concerning the likely scope of the Plan, which I am pleased to offer on our client's behalf. This letter is also accompanied by a Planning Assessment in respect of our client's land at   |

Ramsbury, north of Whittonditch Road, that has been submitted as part of your "call for sites" request. A plan of the site and the completed proforma is also attached - see separate rep. In the first instance, we would support the modifications proposed in your recently published document and as set out in the amended wording of the document. It represents an approach to housing in the rural areas in accordance with the National Planning Policy Framework (NPPF). The introduction of "indicative" numbers for housing provision in the Marlborough Community Area (remainder) and elsewhere is a pragmatic approach to the need for flexibility in planning for much needed new housing. Likewise, the intention to review settlement boundaries and to provide clear allocations through the process of preparing a Wiltshire Site Allocations DPD (WSADPD) is welcomed and it is on this process that we would like to make comment. In preparing the WSADPD we consider that it will be important to reflect the clear intention of the NPPF to plan positively to encourage sustainable development, unless there are significant and demonstrably adverse impacts. Therefore it is important that a method for analysing each settlement is clearly set out in the DPD which utilises the NPPF as its main source of identifying what would cause a restriction. Then the DPD could display an analysis of each settlement which would identify the appropriate settlements for growth utilising that method. For example, Ramsbury could be identified as capable of accommodating growth given the range of services it currently offers, being a higher order settlement. In this way, it should be possible to understand the potential for housing growth in the rural areas in a systematic manner. To complement this analysis, it would then be possible to judge the appropriate location for new housing based on an assessment of each settlement according to its needs for housing based on a range of factors: for example the opportunity for new community infrastructure, affordable housing according to local area need, improved or new green infrastructure and other potential improvements that new growth could bring to the rural areas. In respect of the re-consideration of the settlement boundaries, again the methodology for this assessment should be included in the consultation process to ensure that there is consistency across the settlements. Together, these measures would allow appropriate transparency to be introduced to the WSADPD on the assessment methods that would allow my client and others to positively engage with the process when putting forward appropriate sites or settlement boundary changes for consideration. It is noted that Ramsbury Parish Council are actively considering the possibility of a Neighbourhood Plan and is awaiting the outcome of the Wiltshire Core Strategy before any further commitment is made. My client is supportive of the active engagement by the community in considering the future needs of the village. It is felt that the inclusion of the methodologies for analysis within the DPD would be helpful to the Parish Council and other communities to assist them in achieving a consistency of analysis and to help them prepare options for growth for consideration. We also feel that it is important for Wiltshire County to lead on preparing positive proposals for new housing allocations and we would encourage the WSADPD to include suggested sites at an

early stage based on both the analyses made above and the sites that have been put forward.

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| 211 | General -<br>Barford St<br>Martin | SITE S29 “ LAND AT MOUNT LANE, BARFORD ST MARTIN The attached letter is for the attention of the Associate Director, Mr Alistair Cunningham. I would be most grateful if it could passed to him and its receipt acknowledged.   |
| 212 | Melksham                          | See SHLAA submission for land South of Bath Road (A365) West of Carnation Lane, Melksham.   |
| 213 | Tisbury                           | Thank you for the opportunity to comment on the scope for the forthcoming DPD and to respond to the call for sites. We note that there is no document relating to the scope and therefore it is just a call for any thoughts about the scope of the document. On the call for sites we are involved in an existing SHLAA site in the Tisbury community area [number S75 as attached] - we confirm the site is suitable, available and deliverable. We confirm the site should be considered for a development of housing or a mixed housing, services and employment development. In relation to the scope of the DPD below we obviously ask you to carefully consider this site in relation to that document and the stated desires of the community area to provide a solution to the site. There is no need to resubmit the forms as currently provided as the council already has this site logged as part of the SHLAA and you have indicated that the site does not need to be submitted again. Here are some thoughts from a user of the plan system for the scope of your forthcoming Site allocations DPD: Obviously scope within the terms of the Framework and the adopted core strategy [when and if] Follow the normal process for suitability and sustainable development - policy - baseline - sustainability issues - drafting a framework and then consultation [with meaningful alteration if sensible] Be proactive on supply of sites and not seeking to allow for only the minimum Don't be parsimonious on the drawing of settlement boundaries - allow for change to occur within the permissive policies for settlements by being generous with boundaries Meet the challenge for rural housing and services and do not assume this is met elsewhere Consider affordable housing requirements in relation to the specific and identified various community areas and take latest Government consultations into consideration in relation to thresholds Be sensible with housing sites and their expected contributions - be specific to the locations and the new schemes actually needed by the increasing population [if increasing] Link requirements to local expectations as far as this is positive and seeking to allow for future growth, change and provision Provide easy management of policy and deliverability and monitoring by the public and business Allow for easy updates and modification |
| 214 | Calne                             | See attached SHLAA submission for land adjacent Fynamore Gardens - Vern Leaze A.  |

215            General            Wiltshire Housing Site Allocations Development Plan Document (DPD) On behalf of our client, Persimmon Homes Wessex, we are instructed to make comments on the scope of the Wiltshire Housing Site Allocations DPD. On behalf of our clients a planning application is currently being prepared for an Ashton Park Urban Extension consistent with the proposed allocation as proposed in Wiltshire Core Strategy Core Policy 29 and consistent with the strategic objectives and distribution of Wiltshire's housing requirement set out in Core Policies 1 and 2 of the Core Strategy currently under Examination. On the 2nd December 2013 the Examination Inspector wrote to the Council seeking the views of the Council on a number of key matters. A key area of concern identified by the Inspector was that the Council's evidence base, including the Strategic Housing Market Assessment (SHMA), does not support an objectively assessed housing need as low as 37,000 homes. Moreover, it was the Inspector's conclusion that the objectively assessed housing need for Wiltshire would be in the region of 44,000 homes for the Plan period (2006-2026). With reference to the Council's Sustainability Appraisal, which identified a range of between 35,800 and 42,100 new homes, the Inspector considered that the Core Strategy housing requirement should be expressed as a minimum figure towards the upper end of this range. In response the Council has set out Proposed Modifications which now make provision for at least 42,000 new homes in Wiltshire for the Plan period 2006-2026. The modifications to the Plan have significant implications for the disaggregation of housing across the three Housing Market Areas (HMAs) and the distribution of development within the Community Areas. The 10th Procedural Letter sought clarification from the Council as to how this change will be accommodated. A suggested approach from the Inspector was for the Council to prepare a Site Allocations DPD which would set out how the broad disaggregation of the increased housing provision for the three HMAs would be provided. This process could be complementary to any Neighbourhood Plan currently being prepared. Linked to this additional work identified the Inspector also raised concerns in respect of Settlement Boundaries. In the 10th Procedural Letter the Inspector expressed concern that the extent of the boundaries have not been reviewed in the preparation of the Wiltshire Core Strategy and that "it cannot be argued with great strength that the settlement boundaries contained therein are up-to-date for the purposes of the CS plan period". The reliance placed on the Neighbourhood Planning process as the vehicle to deliver the necessary updates was criticised by the Inspector as there remains a considerable risk that such plans will not be delivered in a comprehensive and timely fashion across the County, which in turn could "potentially stymie development initiatives on the basis of an unjustified evidence base and therefore not represent a positive form of planning". In order to address this and to avoid delays to the adoption of the Wiltshire Core Strategy the Inspector suggested that there is scope to undertake such a review through the Site Allocations DPD. This recommended approach was subsequently accepted by the Council in the Council's response to the 10th Procedural letter (19th December 2013). The information pertaining to the "scope" of the Housing Site Allocations DPD is limited to that presented on the Council's website. We support the primary role of the DPD in

that it is intended to be the delivery mechanism for increased housing provision as identified by the Examination Inspector by identifying sufficient land (sites) across Wiltshire to ensure an adequate supply of housing land is available over the Plan period. The scope of works set out on the Council's website identifies a "review" of Settlement Boundaries as being in addition to the primary site identification role of the DPD. The two processes are inextricably linked and one cannot be delivered without proper regard to the other. It is therefore recommended that the Scope of the works is amended to reflect the need to undertake a comprehensive review of Settlement Boundaries irrespective of overall housing provision. The Site Allocations DPD is not a capacity driven exercise rather it responds to the overall disaggregation of growth at the County's three HMAs as defined through the January 2014 'Methodology for Disaggregation of Increased Housing Requirement to Community Area and Housing Market Area Level. The disaggregation of the increased housing provision is intended to be provided whilst maintaining the integrity of the Spatial Strategy and current balance of growth in each area, with each part of the County to receive a "proportionate, pro-rata increase", although it is recognised that not all community areas will be able to accommodate a pro-rata increase. We raise no objection to the aspiration to maintain the Spatial Strategy across the County, however we are concerned that the tone of the "scope" has the potential limit the review of Settlement Boundaries to a process which is predicated on an identified housing provision, rather than a comprehensive review of the rationale of existing boundaries which we consider necessary to lock in flexibility to enable the delivery of housing at suitable and sustainable locations. The review of Settlement Boundaries should be undertaken in the context of the NPPF and the objective to boost significantly the supply of housing and the presumption in favour of sustainable development. The Scope of the DPD does not adequately consider the review of Settlement Boundaries in this context, the review should be a bottom up exercise which recognises and responds to need, which the Examination Inspector concluded was in fact higher than the 42,000 requirement set out in the Wiltshire Core, arising across Wiltshire and should be delivered in conformity with the Spatial Strategy. The failure to do so will result in a situation where Settlement Boundaries will artificially constrain sustainable development opportunities which is inconsistent with the objectives of the NPPF. This is considered to be a critical point as the housing requirements for the HMAs and Community Areas are 'indicative' minimum figures. It is therefore important to ensure that Settlement Boundaries remain fit for purposes throughout the Plan period and do not become an obstacle to the delivery of sustainable development. The review of Settlement Boundaries should also consider the delivery of strategic sites, including that at Ashton Park, Trowbridge. The outcome of the review should ensure that those identified strategic allocations will be located within updated Settlement Boundaries. This is considered necessary to ensure that updated Settlement Boundaries accurately reflect planned development and avoids circumstances where large scale strategic sites, supported by the Council and with specific policy provision in place through the Core Strategy, remain outside of Settlements Boundaries. Such scenarios will undermine the



validity and application of Settlement Boundaries as a policy tool to act as a break on inappropriate development. On behalf of our client we also raise concerns in respect of the Council's approach to 900 dwellings which the January 2014 Methodology Paper (paragraph 2.2.) considers to be outside of this process as they have already been consented as specific schemes as part of the growth of the Swindon urban area. As a consequence the remainder figure (i.e. 42,000 minus the 900 dwellings) is disaggregated across the County. We cannot support the Council in this respect as the consequential reduction in the overall housing requirement for Wiltshire is inconsistent with the previously stated position by Wiltshire Council. Previous documents confirmed that any development at the West of Swindon is above and beyond that for Wiltshire. On this point paragraph 5.6 of Topic Paper 15 (Housing Requirement Technical Paper -Feb 2012), prepared in support of the Submitted Core Strategy, concluded that housing requirements for Wiltshire make no allowance for development at the West of Swindon and that: ". . . any further development (including that at Moredon Bridge) at the West of Swindon should be seen as being in addition to that required for Wiltshire alone". Furthermore, in support of the Examination of the Swindon Borough Local Plan a Statement of Common Ground was produced between Wiltshire Council and the Borough (April 2013) where, at paragraph 9 it was agreed that: "In respect of the Ridgeway Farm and Moredon Bridge consents, it is agreed that they contribute to the Borough's 5-year housing supply". It is therefore clear that the deduction of 900 homes from the overall target for Wiltshire is not supported by the stated position of Wiltshire Council. As such the 900 currently outside of this process homes should be included as part of the housing requirement for Wiltshire and its disaggregation across the three HMAs and Community Areas considered as part of the DPD process. In terms of the settlements to be considered as part of this DPD the scope of works suggests that only Local Service Centres in the South Wiltshire HMA will be considered. It should be made clear that Local Service Centres throughout Wiltshire will be considered as part of this process. Finally we are concerned that the Scope of the DPD does not adequately explain the relationship between the review of Settlement Boundaries and the Neighbourhood Planning process. To adequately respond to the concerns raised by the Examination Inspector the review of Settlement Boundaries must be comprehensive and just a mechanism to allocate sites. The DPD should be the primary mechanism through which the review is undertaken with Neighbourhood Plans (where in place) able to undertake further adjustments to respond to specific local issues. Further clarity on the role of Neighbourhood Plans and how such Plans relate to the DPD must be provided. The Site Allocations DPD provides the opportunity to respond to the issues identified by the Examination Inspector through a comprehensive review of Settlement Boundaries parallel to a site identification process which maintains the integrity of the Spatial Strategy. We look forward to the opportunity to comment on future stages of the DPD.

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216	Purton	See attached SHLAA submission.
217	Market Lavington	<p>Wiltshire Housing Site Allocations Development Plan Document (DPD) On behalf of our client, Persimmon Homes Wessex, we are instructed to make comments on the scope of the Wiltshire Housing Site Allocations DPD. Our clients are actively promoting the site at Fiddington Hill to the east of Market Lavington (site Location Plan attached). This site lies outside, but adjacent to the Settlement Boundary of Market Lavington. The Spatial Strategy for Wiltshire classifies Market Lavington as a Local Service Centre and is the most significant settlement outside of Devizes in the Community Area. As such the Fiddington Hill site represents a sustainable development opportunity consistent with the objectives of the NPPF with capacity to deliver up to 58 dwellings, contributing to the housing needs for the Community Area in manner which does not undermine the spatial strategy for Wiltshire. On the 2nd December 2013 the Examination Inspector wrote to the Council seeking the views of the Council on a number of key matters. A key area of concern identified by the Inspector was that the Council's evidence base, including the Strategic Housing Market Assessment (SHMA), does not support an objectively assessed housing need as low as 37,000 homes. Moreover, it was the Inspector's conclusion that the objectively assessed housing need for Wiltshire would be in the region of 44,000 homes for the Plan period (2006-2026). With reference to the Council's Sustainability Appraisal, which identified a range of between 35,800 and 42,100 new homes, the Inspector considered that the Core Strategy housing requirement should be expressed as a minimum figure towards the upper end of this range. In response the Council has set out Proposed Modifications which now make provision for at least 42,000 new homes in Wiltshire for the Plan period 2006-2026. The modifications to the Plan have significant implications for the disaggregation of housing across the three Housing Market Areas (HMAs) and the distribution of development within the Community Areas. The 10th Procedural Letter sought clarification from the Council as to how this change will be accommodated. A suggested approach from the Inspector was for the Council to prepare a Site Allocations DPD which would set out how the broad disaggregation of the increased housing provision for the three HMAs would be provided. This process could be complementary to any Neighbourhood Plan currently being prepared. Linked to this additional work identified the Inspector also raised concerns in respect of Settlement Boundaries. In the 10th Procedural Letter the Inspector expressed concern that the extent of the boundaries have not been reviewed in the preparation of the Wiltshire Core Strategy and that "it cannot be argued with great strength that the settlement boundaries contained therein are up-to-date for the purposes of the CS plan period". The reliance placed on the Neighbourhood Planning process as the vehicle to deliver the necessary updates was criticised by the Inspector as there remains a considerable risk that such plans will not be delivered in a comprehensive and timely fashion across the County, which in turn could "potentially stymie development initiatives on the basis of an unjustified evidence base and therefore not represent a positive form of planning". In</p>

order to address this and to avoid delays to the adoption of the Wiltshire Core Strategy the Inspector suggested that there is scope to undertake such a review through the Site Allocations DPD. This recommended approach was subsequently accepted by the Council in the Council's response to the 10th Procedural letter (19th December 2013). The information pertaining to the "scope" of the Housing Site Allocations DPD is limited to that presented on the Council's website. We support the primary role of the DPD in that it is intended to be the delivery mechanism for increased housing provision as identified by the Examination Inspector by identifying sufficient land (sites) across Wiltshire to ensure an adequate supply of housing land is available over the Plan period. The scope of works set out on the Council's website identifies a "review" of Settlement Boundaries as being in addition to the primary site identification role of the DPD. The two processes are inextricably linked and one cannot be delivered without proper regard to the other. It is therefore recommended that the Scope of the works is amended to reflect the need to undertake a comprehensive review of Settlement Boundaries irrespective of overall housing provision. The Site Allocations DPD is not a capacity driven exercise rather it responds to the overall disaggregation of growth at the County's three HMAs as defined through the January 2014 'Methodology for Disaggregation of Increased Housing Requirement to Community Area and Housing Market Area Level. The disaggregation of the increased housing provision is intended to be provided whilst maintaining the integrity of the Spatial Strategy and current balance of growth in each area, with each part of the County to receive a "proportionate, pro-rata increase", although it is recognised that not all community areas will be able to accommodate a pro-rata increase. We raise no objection to the aspiration to maintain the Spatial Strategy across the County, however we are concerned that the tone of the "scope" has the potential limit the review of Settlement Boundaries to a process which is predicated on an identified housing provision, rather than a comprehensive review of the rationale of existing boundaries which we consider necessary to lock in flexibility to enable the delivery of housing at suitable and sustainable locations. The review of Settlement Boundaries should be undertaken in the context of the NPPF and the objective to boost significantly the supply of housing and the presumption in favour of sustainable development. The Scope of the DPD does not adequately consider the review of Settlement Boundaries in this context, the review should be a bottom up exercise which recognises and responds to need, which the Examination Inspector concluded was in fact higher than the 42,000 requirement set out in the Wiltshire Core, arising across Wiltshire and should be delivered in conformity with the Spatial Strategy. The failure to do so will result in a situation where Settlement Boundaries will artificially constrain sustainable development opportunities which is inconsistent with the objectives of the NPPF. This is considered to be a critical point as the housing requirements for the HMAs and Community Areas are 'indicative' minimum figures. It is therefore important to ensure that Settlement Boundaries remain fit for purposes throughout the Plan period and do not become an obstacle to the delivery of sustainable development A related point concerns the Council's approach to 900 dwellings which the January 2014 Methodology Paper

(paragraph 2.2.) considers to be outside of this process as they have already been consented as specific schemes as part of the growth of the Swindon urban area. As a consequence the remainder figure (i.e. 42,000 minus the 900 dwellings) is disaggregated across the County. We cannot support the Council in this respect as the consequential reduction in the overall housing requirement for Wiltshire is inconsistent with the previously stated position by Wiltshire Council. Previous documents confirmed that any development at the West of Swindon is above and beyond that for Wiltshire. On this point paragraph 5.6 of Topic Paper 15 (Housing Requirement Technical Paper -Feb 2012), prepared in support of the Submitted Core Strategy, concluded that housing requirements for Wiltshire make no allowance for development at the West of Swindon and that: ". . . any further development (including that at Moredon Bridge) at the West of Swindon should be seen as being in addition to that required for Wiltshire alone". Furthermore, in support of the Examination of the Swindon Borough Local Plan a Statement of Common Ground was produced between Wiltshire Council and the Borough (April 2013) where, at paragraph 9 it was agreed that: "In respect of the Ridgeway Farm and Moredon Bridge consents, it is agreed that they contribute to the Borough's 5-year housing supply". It is therefore clear that the deduction of 900 homes from the overall target for Wiltshire is not supported by the stated position of Wiltshire Council. As such the 900 currently outside of this process homes should be included as part of the housing requirement for Wiltshire and its disaggregation across the three HMAs and Community Areas considered as part of the DPD process. In terms of the settlements to be considered as part of this DPD the scope of works suggests that only Local Service Centres in the South Wiltshire HMA will be considered. It should be made clear that Local Service Centres throughout Wiltshire will be considered as part of this process. Finally we are concerned that the Scope of the DPD does not adequately explain the relationship between the review of Settlement Boundaries and the Neighbourhood Planning process. To adequately respond to the concerns raised by the Examination Inspector the review of Settlement Boundaries must be comprehensive and just a mechanism to allocate sites. The DPD should be the primary mechanism through which the review is undertaken with Neighbourhood Plans (where in place) able to undertake further adjustments to respond to specific local issues. Further clarity on the role of Neighbourhood Plans and how such Plans relate to the DPD must be provided. The Site Allocations DPD provides the opportunity to respond to the issues identified by the Examination Inspector through a comprehensive review of Settlement Boundaries parallel to a site identification process which maintains the integrity of the Spatial Strategy. We look forward to the opportunity to comment on future stages of the DPD.

- 218 All Cannings See attached SHLAA submission.
- 219 Chirton See attached SHLAA submission.

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220	Washpool	See attached SHLAA submission.
221	Alderbury	<p>Wiltshire Housing Site Allocations Development Plan Document (DPD) On behalf of our client, the Longford Estate, we are instructed to make comments on the scope of the Wiltshire Housing Site Allocations DPD. The Longford Estate control significant land holdings in South Wiltshire and our comments are submitted principally in the context of our client's site at Firs Road, Alderbury. Alderbury is identified as a Market Town within the Southern Wiltshire Community Area and is subject to the provisions of Core Policy 24 of the emerging Wiltshire Core Strategy. The site is considered to represent a sustainable and suitable location for development to meet identified housing needs and as such should be considered as an appropriate location within the forthcoming Site Allocations DPD site assessment. On behalf of the Longford Estate further representations on the Proposed Modifications to the Wiltshire Core Strategy will be made in due course, but it is considered necessary to make specific representations in response to the consultation on the scope of the Wiltshire Housing Site Allocations DPD. On the 2nd December 2013 the Examination Inspector wrote to the Council seeking the views of the Council on a number of key matters. A key area of concern identified by the Inspector was that the Council's evidence base, including the Strategic Housing Market Assessment (SHMA), does not support an objectively assessed housing need as low as 37,000 homes. Moreover, it was the Inspector's conclusion that the objectively assessed housing need for Wiltshire would be in the region of 44,000 homes for the Plan period (2006-2026). With reference to the Council's Sustainability Appraisal, which identified a range of between 35,800 and 42,100 new homes, the Inspector considered that the Core Strategy housing requirement should be expressed as a minimum figure towards the upper end of this range. In response the Council has set out Proposed Modifications which now make provision for at least 42,000 new homes in Wiltshire for the Plan period 2006-2026. The modifications to the Plan have significant implications for the disaggregation of housing across the three Housing Market Areas (HMAs) and the distribution of development within the Community Areas. The 10th Procedural Letter sought clarification from the Council as to how this change will be accommodated. A suggested approach from the Inspector was for the Council to prepare a Site Allocations DPD which would set out how the broad disaggregation of the increased housing provision for the three HMAs would be provided. This process could be complementary to any Neighbourhood Plan currently being prepared. Linked to this additional work identified the Inspector also raised concerns in respect of Settlement Boundaries. In the 10th Procedural Letter the Inspector expressed concern that the extent of the boundaries have not been reviewed in the preparation of the Wiltshire Core Strategy and that "it cannot be argued with great strength that the settlement boundaries contained therein are up-to-date for the purposes of the CS plan period". The reliance placed on the Neighbourhood Planning process as the vehicle to deliver the necessary updates was criticised by the Inspector as there remains a considerable risk that such plans will not be delivered in a</p>

comprehensive and timely fashion across the County, which in turn could "potentially stymie development initiatives on the basis of an unjustified evidence base and therefore not represent a positive form of planning". In order to address this and to avoid delays to the adoption of the Wiltshire Core Strategy the Inspector suggested that there is scope to undertake such a review through the Site Allocations DPD. This recommended approach was subsequently accepted by the Council in the Council's response to the 10th Procedural letter (19th December 2013). The information pertaining to the "scope" of the Housing Site Allocations DPD is limited to that presented on the Council's website. We support the primary role of the DPD in that it is intended to be the delivery mechanism for increased housing provision as identified by the Examination Inspector by identifying sufficient land (sites) across Wiltshire to ensure an adequate supply of housing land is available over the Plan period. The scope of works set out on the Council's website identifies a "review" of Settlement Boundaries as being in addition to the primary site identification role of the DPD. The two processes are inextricably linked and one cannot be delivered without proper regard to the other. It is therefore recommended that the Scope of the works is amended to reflect the need to undertake a comprehensive review of Settlement Boundaries irrespective of overall housing provision. The Site Allocations DPD is not a capacity driven exercise rather it responds to the overall disaggregation of growth at the County's three HMAs as defined through the January 2014 'Methodology for Disaggregation of Increased Housing Requirement to Community Area and Housing Market Area Level. The disaggregation of the increased housing provision is intended to be provided whilst maintaining the integrity of the Spatial Strategy and current balance of growth in each area, with each part of the County to receive a "proportionate, pro-rata increase", although it is recognised that not all community areas will be able to accommodate a pro-rata increase. We raise no objection to the aspiration to maintain the Spatial Strategy across the County, however we are concerned that the tone of the "scope" has the potential limit the review of Settlement Boundaries to a process which is predicated on an identified housing provision, rather than a comprehensive review of the rationale of existing boundaries which we consider necessary to lock in flexibility to enable the delivery of housing at suitable and sustainable locations. The review of Settlement Boundaries should be undertaken in the context of the NPPF and the objective to boost significantly the supply of housing and the presumption in favour of sustainable development. The Scope of the DPD does not adequately consider the review of Settlement Boundaries in this context, the review should be a bottom up exercise which recognises and responds to need, which the Examination Inspector concluded was in fact higher than the 42,000 requirement set out in the Wiltshire Core, arising across Wiltshire and should be delivered in conformity with the Spatial Strategy. The failure to do so will result in a situation where Settlement Boundaries will artificially constrain sustainable development opportunities which is inconsistent with the objectives of the NPPF. This is considered to be a critical point as the housing requirements for the HMAs and Community Areas are 'indicative' minimum figures. It is therefore important to ensure that Settlement Boundaries remain

fit for purposes throughout the Plan period and do not become an obstacle to the delivery of sustainable development. On behalf of our client we also raise concerns in respect of the Council's approach to 900 dwellings which the January 2014 Methodology Paper (paragraph 2.2.) considers to be outside of this process as they have already been consented as specific schemes as part of the growth of the Swindon urban area. As a consequence the remainder figure (i.e. 42,000 minus the 900 dwellings) is disaggregated across the County. We cannot support the Council in this respect as the consequential reduction in the overall housing requirement for Wiltshire is inconsistent with the previously stated position by Wiltshire Council. Previous documents confirmed that any development at the West of Swindon is above and beyond that for Wiltshire. On this point paragraph 5.6 of Topic Paper 15 (Housing Requirement Technical Paper -Feb 2012), prepared in support of the Submitted Core Strategy, concluded that housing requirements for Wiltshire make no allowance for development at the West of Swindon and that: ". . . any further development (including that at Moredon Bridge) at the West of Swindon should be seen as being in addition to that required for Wiltshire alone". Furthermore, in support of the Examination of the Swindon Borough Local Plan a Statement of Common Ground was produced between Wiltshire Council and the Borough (April 2013) where, at paragraph 9 it was agreed that: "In respect of the Ridgeway Farm and Moredon Bridge consents, it is agreed that they contribute to the Borough's 5-year housing supply". It is therefore clear that the deduction of 900 homes from the overall target for Wiltshire is not supported by the stated position of Wiltshire Council. As such the 900 currently outside of this process homes should be included as part of the housing requirement for Wiltshire and its disaggregation across the three HMAs and Community Areas considered as part of the DPD process. In terms of the settlements to be considered as part of this DPD the scope of works suggests that only Local Service Centres in the South Wiltshire HMA will be considered. It should be made clear that Local Service Centres throughout Wiltshire will be considered as part of this process. Finally we are concerned that the Scope of the DPD does not adequately explain the relationship between the review of Settlement Boundaries and the Neighbourhood Planning process. To adequately respond to the concerns raised by the Examination Inspector the review of Settlement Boundaries must be comprehensive and just a mechanism to allocate sites. The DPD should be the primary mechanism through which the review is undertaken with Neighbourhood Plans (where in place) able to undertake further adjustments to respond to specific local issues. Further clarity on the role of Neighbourhood Plans and how such Plans relate to the DPD must be provided. The Site Allocations DPD provides the opportunity to respond to the issues identified by the Examination Inspector through a comprehensive review of Settlement Boundaries parallel to a site identification process which maintains the integrity of the Spatial Strategy. We look forward to the opportunity to comment on future stages of the DPD.



222	Salisbury	See attached SHLAA submission for land at Broad Chalke, Salisbury.
223	Melksham	See attached SHLAA submission for land at Woolmore Manor, Melksham.
224	Cotswold Community	Amita Management Ltd is promoting the revival of the Cotswold Community site which is located within the Malmesbury Community Area. Hunter Page Planning has previously submitted representations in respect of the Cotswold Community site to Wiltshire's call for sites in February 2014.
225	General	<p>Re: Wiltshire Housing Site Allocations DPD-Scoping Consultation Introduction and site submissions This letter is in response to the above consultation and provides Gladman Development's comments on this initial stage of the preparation of the Housing Site Allocations DPD. Alongside this submission Gladman will be submitting a number of site submissions to the Call for Sites. Gladman submit that these all offer sustainable locations for housing growth and should be considered as part of the site allocations process. For clarity below is a list of these submissions: Land north of Bath Road, Corsham Land south of The Forty and adjoining Cricklade Road, Cricklade Land at Westbury Road, Great Cheverall Land to the south of Melksham Road, Holt Land on the south-east side of Stone Lane, Lydiard Millicent Land west of Shurhold Road, Melksham Land south of Sand Hole Lane, Westbury Land at Farthing Lane, Lyneham</p> <p>Purpose of the site allocations DPD Gladman note from the Council website that the Housing Site Allocations DPD will cover two key matters. Principally, this document is to support the delivery of housing growth as set out through the emerging Wiltshire Core Strategy. To do this the document will identify sufficient land (in the form of sites) to deliver the necessary scale of growth over the period to 2026. In addition to identifying sites for housing the document will review settlement boundaries, as defined in the emerging Wiltshire Core Strategy in relation to the Principal Settlements, Market Towns, Local Service Centres and Large Villages. Key considerations Gladman have been actively involved in the Wiltshire Core Strategy preparation and Examination, raising significant concerns regarding the overall scale of housing growth proposed through this Plan. Gladman will be submitting further representations to the Core Strategy Proposed Modifications and any further stages of consultation in due course. The Core Strategy must identify sufficient sites to provide a five year supply of housing land. The issue of five year housing land supply is likely to lead to the need for further strategic allocations in the Core Strategy. Through this Housing Site Allocations DPD the Council need to over allocate in terms of the number of sites needed to cover the full scale of growth in the emerging Core Strategy. This will provide flexibility in the Plan and help ensure delivery. Sites included within the Housing Site Allocations DPD may not come forward to the scale or timeframes proposed and this element of over allocation will help to ensure the delivery of the identified scale of growth across the area. Non-delivery of sites can happen for a variety of reasons, including viability or technical constraints, therefore it is</p>



critical that the Housing Site Allocations DPD factors in an element of flexibility. The Council need to ensure that their housing trajectory is realistic, both in terms of deliverability and the ability to maintain a rolling five year supply of housing land. The Council must, through their Sustainability Appraisal be able to demonstrate that reasonable alternatives have been considered and dealt with in a fair and comparable manner. Furthermore, when the Council are reviewing the settlement boundaries, they need to ensure that these offer a positive approach to growth and are not drawn too tightly around existing settlements so that they effectively act to restrict sustainable development from coming forward. The settlement boundaries must provide for flexibility. The site allocations DPD should be complementary to neighbourhood plans. Opportunities for additional allocations at settlements where neighbourhood planning is taking place, should not be ruled out. Any such opportunities should be considered as reasonable alternatives and could form additional allocations if they are demonstrated to be sustainable. This Housing Site Allocations DPD should not include a blanket policy which restricts all development outside of the settlement boundaries/areas within the open countryside. In respect of development within the open countryside Gladman would recommend the following policy wording, which is NPPF compliant. 'Development will be permitted in the open countryside provided that the adverse impacts do not significantly and demonstrably outweigh the benefits of the development.' I hope you have found these initial comments on the scope of the Housing Site Allocations DPD constructive. If you require further clarity on any elements of this submission please do not hesitate to contact myself or one of the Gladman team. Gladman are working with the landowners to actively promote the aforementioned sites for residential development. We would be happy to work with the Council throughout this process. If you require any further information (in addition to the separate site submissions) then please do not hesitate to get in touch.

226	Corsham	See attached SHLAA submission for land north of Bath Road, Corsham.
227	Cricklade	See attached SHLAA submission for land south of The Forty and adjoining Cricklade Road, Cricklade.
228	Great Cheverell	See attached SHLAA submission for land at Westbury Road, Great Cheverell.
229	Holt	See attached SHLAA submission for land to the South of Melksham Road, Holt.
230	Lydiard Millicent	See attached SHLAA submission for on the south east side of Stone Lane, Lydiard Millicent.

231	Melksham	See attached SHLAA submission for land west of Shurnhold Road, Melksham.
232	Lydiard Millicent	See attached SHLAA submission.
233	Westbury	See attached SHLAA submission for land south of Sand Hole Lane, Westbury.
234	Lyneham	See attached SHLAA submission for land at Farthing Lane, Lyneham.
235	Amesbury	See attached SHLAA submission.
236	Christian Malford	See attached SHLAA submission.
237	Christian Malford	See attached SHLAA submission.
238	Calne	See attached SHLAA site on land at Abberd Way, Calne.
239	Melksham	See attached SHLAA submission for land at Bath Road, Melksham.
240	Whiteparish	See attached SHLAA submission.
241	Compton Bassett	See attached SHLAA submission for land at Briar Leaze, Compton Bassett.
242	Royal Wootton Bassett	See attached SHLAA submission for land at Rosary and Tinkers Field, Royal Wootton Bassett.
243	Barford St Martin	Re an 'e' mail sent from my brother Mr. J. Woolley at Woolley and Wallis, Castle Street Salisbury. I would like it noted that I agree with his comments, and would like information sent to me, direct [if possible] regarding future developments. The site

in question is at Barford St. Martin and the number is 029.OS405594131546

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| 244 | Purton            | I now attach a submission to the Consultation. To support it I also attach the results of an on-line survey conducted last week concerning the basic proposition of building within the current settlement boundary or outside. Since the other two documents cited Transforming Purton Parish and the Purton Parish Plan are rather large, they may be downloaded from:<br><a href="http://carbonbrake.com/transforming-purton-parish/">http://carbonbrake.com/transforming-purton-parish/</a> (for Transforming Purton Parish)<br><a href="http://www.purtonparishcouncil.gov.uk/Parish-Plan.aspx">http://www.purtonparishcouncil.gov.uk/Parish-Plan.aspx</a> (for Purton Parish Plan) |
| 245 | Yatton<br>Keynell | Please see attached.   |
| 246 | Beanacre          | Please find attached a site plan/location plan for land at Beanacre under application for SHLAA.   |
| 247 | Edington          | Please find attached a SHLAA submission regarding a site in Edington on behalf of Qdos Homes Ltd.  |
| 248 | Semington         | Please find attached a submission to consider the land detailed in the attached application for inclusion in the Council's future plans for development.   |
| 249 | Calne             | See attached SHLAA submission for land at Abberd Way and Broken Cross, Calne.  |
| 250 | Calne             | See attached SHLAA submission at Castle Walk, Calne.   |
| 251 | Calne             | See attached SHLAA submission for land at Colemans Farm and Woodroffe Square, Calne.   |
| 252 | Cricklade         | See attached SHLAA submission for land at Culverhay, Cricklade.  |
| 253 | Purton            | See attached SHLAA submission for land at Dogridge, Purton.  |
| 254 | Warminster        | See attached SHLAA submission for land at Grovelands, Warminster.  |
| 255 | Cricklade         | See attached SHLAA submission for land at Heberdon House, Cricklade.   |
| 256 | Purton            | See attached SHLAA submission for land at Hooks Hill, Purton.  |

- 257 Rudloe See attached SHLAA submission for land at Rudloe Regeneration Area.
- 258 Kilmington Please find attached 3 attachments that contain the Proforma and two maps, one to show the site in Kilmington and the other a close up version. If any information is not present or is unclear please do not hesitate to contact me .
- 259 Alderbury In response to Wiltshire Council's call for sites', please see attached a submission on behalf of the Longford Estate, which promotes a site off Firs Road in Alderbury. The site can viably accommodate 50 houses (including affordable) and access. Along with the completed form, we submit an identification plan and an indicative masterplan. This has been informed by technical reports, surveys, a public consultation exercise and pre-application discussions with planning officers. The Estate is committed to the development of the site, and wishes to continue to involve the Council in the evolution of the scheme. Please note that there is an addendum to the form which provides a detailed response to question: "Are there any other issues that the council should be aware of that are not identified above". Should you have any questions, please feel free to contact me.
- 260 Edington See attached SHLAA form and site plan.
- 261 West Lavington I have pleasure in attaching Oliver Taylor's submission on behalf of Mr Hugo Huggett.
- 262 General - Barford St Martin To whom it may concern, I have just heard (via third party) that the deadline for comments on planned developments in the Wiltshire area is May 6 th . I own the portion of the field directly in front of Barford House, (the document states single ownership, this is not the case), your reference Site S29 which is an important open space in an AONB and in a conservation area and I am absolutely opposed to any development there. The map attached shows the shaded area that belongs to Barford House.
- 263 Quemerford See attached SHLAA form and site map.
- 264 Ramsbury Please find attached a submission for a site at Ramsbury. This Practice is instructed to prepare and submit further information in respect of these sites in due course. Should you wish to discuss any aspect of this matter further please do not hesitate in contacting me.
- 265 Marlborough Please find attached a submission for a site at Marlborough. This Practice is instructed to prepare and submit further information in respect of these sites in due course. Should you wish to discuss any aspect of this matter further please do not

		hesitate in contacting me.
266	Corsley Heath	Please find attached a submission for a site at Corsley Heath. This Practice is instructed to prepare and submit further information in respect of these sites in due course. Should you wish to discuss any aspect of this matter further please do not hesitate in contacting me.
267	Crudwell	See attached site plan.
268	Corsham	See attached SHLAA form.
269	Pewsey	<p>Re: Wiltshire Housing Site Allocations Development Plan Document I write on behalf of the Paul Bowerman Discretionary Trust ("The Trust") in response to the Wiltshire Housing Site Allocations Development Plan Document ("Housing Sites DPD") consultation. The Trust owns land at Salisbury Road, Pewsey which is suitable and available development and has been promoting this land through the Wiltshire Core Strategy and Pewsey Neighbourhood Plan. The Housing Sites DPD will review settlement boundaries and identify housing sites to ensure sufficient delivery of housing across Wiltshire's community areas in accordance with the Core Strategy. The most recent Wiltshire Housing Land Supply Statement February 2014 identifies a remaining requirement for 189 dwellings to be identified in the Pewsey Community Area against current Core Strategy housing requirements. Pewsey is the largest and most sustainable settlement in the Community Area and in accordance with the Core Strategy should be the focus for development. The Trust has engaged with the Pewsey Neighbourhood Plan process to date. The parish remain in the early stages of a neighbourhood plan having published a first draft neighbourhood plan for consultation late in 2013. To date, the neighbourhood plan has not sought to identify site allocations beyond the settlement boundary. Notwithstanding the parish's intention to prepare a neighbourhood plan, The Trust consider that Pewsey should be included within the scope of the Housing Sites DPD. This is to ensure sufficient housing sites are identified should the neighbourhood plan, for whatever reason, not proceed to do so. Land at Salisbury Road, Pewsey should be considered for allocation in the Housing Sites DPD as a suitable and available site which can deliver circa 200 dwellings. The site has been assessed as suitable for development in the Strategic Housing Land Availability Study (SHLAA, Site Ref 1 083). The site has a number of advantages in meeting housing needs: it can offer a comprehensive form of development; it is close to local services and facilities; and it can deliver community benefits such as creation of a River Avon corridor nature reserve. The Trust's land also has scope to provide employment uses. The Trust has previously prepared and submitted through the Core Strategy process an illustrative masterplan for the site. I have reattached this masterplan for your convenience. Having regard to the</p>

above, The Trust look forward to confirmation that Land at Salisbury Road, Pewsey has been included within the scope of the Housing Sites DPD. Should you require any further information relating to the site please do not hesitate to contact me.

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| 270 | General -<br>Marden Way | I am writing to raise my concern that the field at the end of Marden Way in Wenhill Heights is being put forward by the landowner as a suitable site for building houses, and that this location will be considered as part of the Strategic Housing Land Availability Assessment currently being carried out by Wiltshire Council. I understand that in the outline planning application for the Silver Street development (11/03628/OUT), the applicant stated that they were going to make an application to build 60 houses on the Marden Way field. This could potentially mean that an additional 60 to 100 cars would need to access Wenhill Heights, bearing in mind that the majority of households now have at least one, if not two, cars. Marden Way isn't suitable for this kind of additional traffic; it is already hazardous due to the number of vehicles parked on the road. The alternative access would be Wenhill Lane, which is even more unsuitable. As a long term resident of Wenhill Heights (over 20 years), I would appreciate it if my concerns were put on file. |
| 271 | Whiteparish             | Please see the attached form and map.  |
| 272 | Melksham                | Wilts & Berks Canal Trust proposals for enabling development for the Melksham Link Waterway project  |
| 273 | Melksham                | Wilts & Berks Canal Trust proposals for enabling development for the Melksham Link Waterway project  |
| 274 | Winsley                 | Land to west of Winsley and south of B3108 Please find my clients representation with regard to the above land. Clients - Winsley Parish Council and Retirement Villages Group Ltd.  |
| 275 | Melksham                | Wilts & Berks Canal Trust proposals for enabling development for the Melksham Link Waterway project  |
| 276 | Melksham                | Wilts & Berks Canal Trust proposals for enabling development for the Melksham Link Waterway project  |
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| 278 | Melksham                | Wilts & Berks Canal Trust proposals for enabling development for the Melksham Link Waterway project  |
| 279 | Melksham                | Wilts & Berks Canal Trust proposals for enabling development for the Melksham Link Waterway project  |

- 280      Urchfont      See attached SHLAA submission for Crookwood Lane, Urchfont.
- 281      Melksham      Wilts & Berks Canal Trust proposals for enabling development for the Melksham Link Waterway project
- 282      Melksham      Wilts & Berks Canal Trust proposals for enabling development for the Melksham Link Waterway project
- 283      Melksham      Wilts & Berks Canal Trust proposals for enabling development for the Melksham Link Waterway project
- 284      Marlborough      Please find attached details of two sites owned by Marlborough College, which, on their behalf, I am submitting for consideration in the "call for sites" process and in relation to the review of settlement boundaries. One of the sites is currently included as Site 565-Land off Irving Way, in the current SHLAA. The Barton Dene submission is an amendment to SHLAA Site 565. In summary the site area is increased overall and the submission seeks to clarify that the site is owned by Marlborough College. An additional site is also submitted at College Fields, also owned by Marlborough College. I have attached a completed form for each site and also attached two differently named copies of the same OS plan. If you have any queries in relation to either submission please do not hesitate to contact me.
- 285      Marlborough      Please find attached details of two sites owned by Marlborough College, which, on their behalf, I am submitting for consideration in the "call for sites" process and in relation to the review of settlement boundaries. One of the sites is currently included as Site 565-Land off Irving Way, in the current SHLAA. The Barton Dene submission is an amendment to SHLAA Site 565. In summary the site area is increased overall and the submission seeks to clarify that the site is owned by Marlborough College. An additional site is also submitted at College Fields, also owned by Marlborough College. I have attached a completed form for each site and also attached two differently named copies of the same OS plan. If you have any queries in relation to either submission please do not hesitate to contact me.
- 286      Whiteparish      I understand from a letter sent to us recently that the Wiltshire Core Strategy Document is being revised, and that an associated "call for sites" has been made. The site which I wish to propose is owned by my company, SJK Scientifics Ltd, and is annotated "S57: Land at Penwood Farm, Whiteparish" in the Appendix of the last edition of the Wiltshire Core Strategy. Could I ask you to add our site, S57 to the latest revision of the "potential sites" section of the new Wiltshire Core Strategy? We feel that the land has good potential for use as a housing and/or business development. I have enclosed a map drawn from the last iteration of the Wiltshire Core Strategy document, with our land edged in red. It measures approximately 7 acres and adjoins the A27 Whiteparish to Romsey road on the south western side. It has direct access from the A27. You conducted an evaluation of

this land prior to its admission into the last published version of the Wiltshire Core Strategy, but if you have any further questions or need additional details, please do not hesitate to contact me. Could you please send me confirmation that you are able to enter the land into the plan?

- 287 Westbury I refer to the above and write to you on behalf of my client Mr Clark, enclosing a form and plan detailing a site that we wish to be included in the call for sites associated with the Strategic Housing Land Availability Assessment and the Wiltshire Housing Site Allocations Plan. I would be grateful if you could confirm receipt of the enclosed and please do not hesitate to revert to Bluestone Planning should you have any further questions in connection with enclosed.
- 288 Chippenham Please find attached completed SHLAA Call for Sites submission form and land ownership plan for consideration.
- 289 Bushton Please find attached a SHLAA site submission and a map showing the site boundary which I am sending on behalf of the landowners.
- 290 Minety Would it be possible to lodge the attached SHLAA application please? The attachments are summarised as follows: 1414/shlaa - Completed application forms 1414/1 - Location plan at 1:1250 with site boundary edged red (print at A3) If you need anything further feel free to contact me.
- 291 General WILTSHIRE HOUSING SITE ALLOCATIONS DEVELOPMENT PLAN DOCUMENT (HSA DPD): CONSULTATION ON SCOPE AND CONTENT The Highways Agency (the Agency) welcomes the opportunity to provide comments on the scope and content on the Housing Site Allocations (HSA) DPD. The comments in this letter reflect guidance contained in: ċ the Department for Transport (DfT) & Department for Communities & Local Government (DCLG) publication entitled Guidance on Transport Assessment (dated March 2007); ċ DfT Circular 02/2013 entitled The Strategic Road Network and the Delivery of Sustainable Development, dated 10 September 2013; and ċ the National Planning Policy Framework (NPPF), published by DCLG in March 2012. Please note that the use of the term local plans in the DfT Circular is taken to mean all development plan documents prepared by the local planning authority (LPA), whatever their title. The Strategic Road Network in Wiltshire As you will be aware, the Highways Agency is responsible for operating, maintaining and improving the Strategic Road Network (SRN). The SRN within the plan's area comprises of the following routes: The M4, including Junctions 16 and 17; The A36(T) between the Hampshire and Bath & North East Somerset borders; The A303(T) between the Hampshire to Dorset borders; and A short section of the A419(T) close to Cricklade. Background The Agency has provided representations throughout the various consultation stages of the emerging



Core Strategy. In April 2013, prior to the commencement of the Examination in Public, a Statement of Common Ground (the Statement) was agreed between the Agency and the Council. The agreed position was that the Wiltshire Core Strategy was generally in compliance with the NPPF. However, the Agency submitted a number of additional comments as part of their representations on the Wiltshire Core Strategy Pre-Submission Document consultation. Specifically, the Agency was supportive of Core Policies 1 (Settlement Strategy) and 2 (Delivery Strategy). The Agency considered that the settlement strategy and the hierarchy of settlement would help to ensure that development is directed to the most sustainable locations. The Agency was also supportive of the emphasis of development on previously developed land. However, the Statement did raise some concerns in relation to the omission of certain items from being listed in the Infrastructure Delivery Plan (IDP) which were considered necessary to achieve specific area strategies listed within the Core Strategy. Notably this applied to three Area Strategies (Malmesbury, Marlborough and Chippenham) along with Core Policy 3 (Infrastructure Requirements), due to the increased pressure anticipated on Junction 17 of the M4 by 2026. The agreed position was to include the junction improvements at Junction 17 in the IDP. Since the issuing of the Statement a new version of the IDP has been issued (IDP2, dated September 2013). The schedule within Appendix 1 of the IDP (entitled Wiltshire Strategic, Regional and General) refers to Capacity improvements to M4 Junction 17 (Reference WC 003) and is categorised as being essential infrastructure. The Agency would like to highlight that its level of interest in the DPD is likely to be proportionate to the scale of development proposed in each settlement covered and their proximity (or otherwise) to the SRN. Where settlements are distant from the SRN or allocations are small in scale, or both, then the Agency may not have concerns about traffic impact at all. DPD Scope and Content It is the Agency's understanding that the purpose of the DPD is to: a) identify sufficient land (in the form of sites) to accommodate the housing growth prescribed in the policies of the emerging Core Strategy, and to b) review boundaries of various categories of settlements outlined in draft Core Policy 1 in the emerging Core Strategy, as follows: 2 of the 3 principal settlements (Salisbury & Trowbridge); All 12 of the market towns (Amesbury, Bradford-on-Avon, Caine, Corsham, Devizes, Malmesbury, Marlborough, Melksham, Tidworth and Ludgershall, Warminster, Westbury, and Royal Wootton Bassett); Local Service Centres in the South Wiltshire Housing Market Area (HMA) -Tisbury, Mere, Downton and Wilton -4 of the 7 local service centres designated in the Core Strategy); and All large villages (67 in total). The Agency notes in the Regulation 18 Notice that the DPD will include proposals and associated policies designed to be in general conformity with the emerging Wiltshire Core Strategy and National Planning Policy Framework (NPPF). The Agency welcomes this and has previously provided comments at various stages of the emerging Core Strategy. We also note your intention to prepare a second DPD (Chippenham Site Allocations DPD) to cover specific matters in the geographic area of the Chippenham Community Area and those parts of the Caine & Corsham Community Areas adjacent to the built-up area of Chippenham. No other DPDs beyond these two are

programmed in the most recent edition of your Local Development Scheme. Whilst the Agency is broadly content with the scope and purpose of the DPD as set out above, it does give rise to the following queries which will need clarification as the DPD is prepared: It is not clear why the settlement boundaries of the three local service centres outside the South Wiltshire HMA (Cricklade, Market Lavington & Pewsey) are not intended to be reviewed; Matters relating to defining settlement boundaries and allocating sites in the five large villages within the Chippenham Community Area would appear to fall within the remit of both this DPD and the CSA DPD and it be useful to make clear as to which of the two will cover the matters. We however, anticipate that proposals coming forward in any of them are unlikely to cause significant impact on the SRN; and There does not appear to be any requirement in the DPD to identify land for non housing development purposes (including, potentially, land for transport infrastructure), even though: o the settlement boundary review will presumably need to take account of any land requirements for such uses and Include them within the settlement boundary; and o the absence of additional DPDs means such allocations would not be covered elsewhere. Transport considerations when identifying allocations The NPPF explains that one of the twelve core planning principles is to actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focusing significant development in locations which are, or can be, made sustainable. The NPPF also makes it clear that, in plan-making: Developments that generate significant movement should be located where the need to travel will be minimised and the use of sustainable modes of transport can be maximised (para 34); Where practical, developments should be located to have access to high-quality public transport facilities (para 35); and Policies should aim for a balance of land uses in the plan area so that people can be encouraged to minimise journey lengths. The Agency will be looking for evidence that site allocations in the DPD have been chosen on this basis. We have assumed that, in order to be in general conformity with the Core Strategy, the DPD will be identifying non-strategic (i.e. smaller-scale) sites for development. Notwithstanding that assumption, the Agency has set out relevant excerpts of the OfT Circular which relate to plan-making and transport impact below, for information. The policy states that: Development proposals are likely to be acceptable if they can be accommodated within the existing capacity of a section (link or junction) of the SRN or they do not increase demand for use of a section that is already operating at over-capacity levels, taking account of any travel plan, traffic management and/or capacity enhancement measures that may be agreed (para 9); The Highways Agency's prime consideration will be the continued safe operation of its network, even where development proposals would not result in capacity issues (para 10); In framing its contribution to the development of Local Plans, the Highways Agency's aim will be to influence the scale and patterns of development so that it is planned in a manner which will not compromise the fulfilment of the primary purpose of the SRN. (para 14); and ' Development should be promoted at locations that are or can be made sustainable, that allow for uptake of sustainable transport modes and support wider social and health objectives, and which support existing

business sectors, as well as enabling new growth (para 16). The methodology the Agency must use to assess the need for infrastructure is similarly set out in the OfT Circular. In summary, the Circular states that: Capacity enhancements and infrastructure required to deliver strategic growth should be considered at the Local Plan stage and would not normally be considered as a fresh proposal at the planning application stage (Para 18); Where a potential new capacity need is identified, it will be considered and weighed alongside environmental and deliverability considerations. Additional capacity may be considered in the context of the Highways Agency's forward programme of works, balancing the needs of motorists and other road users with the wider impact on the environment and the local/regional community (para 19); The Agency will work with local authorities and developers to identify opportunities to introduce travel plan and demand management measures through the Local Plan, based on existing and proposed patterns of development, that will support sustainable transport choice and retain capacity within the transport network, so as to provide for further development in future plan periods (para 17); Proposals for the creation of new junctions or direct means of access may be identified and developed at the plan-making stage in circumstances where it can be established that such new infrastructure is essential for the delivery of strategic planned growth (para 39). Other than for serving strategic growth, signed roadside facilities, maintenance compounds and, exceptionally, major transport interchanges, no additional accesses to motorways or other routes of near-motorway standard will be permitted (para 42). The preference will always be that new development should make use of existing junctions; however, the Agency will adopt a graduated and less restrictive approach to the formation or intensification of use of access to the remainder of the SRN. Where a new junction or direct means of access is agreed, the promoter will be expected to secure all necessary consents, and to fund all related design and construction works (para 43); and Modifications to existing junctions will be agreed these do not have an adverse impact on traffic flows and safety (para 42). Transport evidence to support the DPD

As you will be aware, the NPPF explains that LPAs should, ensure that the local plan is based on adequate, up-to-date and relevant evidence. As part of this an assessment should be made of the current quality and capacity of transport infrastructure and its ability to meet forecast demands. This evidence will enable both the LPA and the Agency to satisfy themselves that, in line with the policy in para 182 of the NPPF, that the plan will be found sound by the inspector and that it is 'positively prepared -the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development; Justified -the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence; Effective -the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and Consistent with national policy -the plan should enable the delivery of sustainable development in accordance with the policies in the [NPPF]'. The Agency notes

the existence of relevant transport and accessibility evidence which supports the Core Strategy, or the previous district plans, either directly or indirectly. This includes: Salisbury Transport Strategy (Atkins, 2012); Salisbury Core Strategy Transport Assessment (MVA, 2008) Wiltshire LDF Strategic Transport Assessment (Wiltshire Council, 2009); Chippenham Transport Strategy (SKM, 2013); and The Agency-commissioned M4 Junction 16 and 17 PARAMICS -Wiltshire & Swindon Core Strategy Assessment Report (JMP, 2012). According to how recently they were published and whether the underlying development assumptions in them remain the same, these may provide useful evidence for the preparation of the DPDs. If they are considered out-of-date then additional evidence is likely to be required. The Agency's involvement in transport evidence is guided by policy in the DfT Circular. Paragraph 15 states that the Agency will work with the local authority to understand the transport implications of development options, including assessing the cumulative and individual impacts of local plan proposals on the ability of the road links and junctions affected to accommodate the forecast traffic flows in terms of capacity and safety. Such assessments should be carried out in line with current DfT guidance or on a basis otherwise agreed with the Agency. In addition to the DfT Circular, the Agency's Spatial Planning Advice Note 09109 (SPAN) entitled Local Plans: Evaluating Transport Impacts is relevant. It was updated and reissued in January 2014 and it is appended to this letter. The SPAN explains inter alia that the evaluation to be undertaken should: Confirm there is a realistic expectation that the impact of development can be mitigated; Identify the nature and magnitude of any mitigation required; and Provide a basis for comparison between alternative sites. The Agency considers that the most appropriate way forward at this initial stage of plan preparation will be for the LPA to prepare a scope for the evaluation considered necessary to support the DPD. It should then be agreed with both highway authorities before the work is undertaken. The evaluation should take account of policy in the DfT Circular and the SPAN. The Agency is keen to work closely with Wiltshire Council officers and other relevant bodies to ensure the appropriate transport evidence is in place for the DPD so that it can be demonstrated that allocations are viable and deliverable in transport infrastructure terms. The evaluation should be commensurate with the smaller, non-strategic, nature of the proposed allocations. Concluding Remarks Thank you for consulting the Agency in line with the Local Planning Regulations on the scope and content of the proposed DPD, which is intended to set out allocations for housing and define settlement boundaries across much of the authority area. At this initial stage of plan preparation it is the Agency's view that the critical task for the LPA, in liaison with the Agency and other relevant bodies, is to ensure that: Relevant and up-to-date transport evidence is available to support the DPD, with an evaluation undertaken of the both individual and cumulative traffic impacts of proposed allocations; and with Any mitigation measures which are required to serve the allocations having been identified, taking account of government policies on inter alia viability and deliverability. This will enable all relevant bodies to form a definitive view as to the suitability of the allocations and to understand the infrastructure requirements which will arise. The

Agency is keen to work constructively and closely with the LPA and other relevant bodies to agree the necessary transport evidence and prepare the DPD. This will help demonstrate that the duty to cooperate is being met by relevant bodies. I trust that this information is of assistance to you. Do not hesitate to contact me via the contact details above if you wish to discuss any element of the response further.

- 292      Upavon      Over and above the above representations [WCS Mods consultation] and more specifically with regard to the Wiltshire Housing Site Allocations DPD it is noted that your consultation notification letter also refers to the on-going Call for Sites. In that regard my clients land, off Pewsey Road, Upavon has already been promoted to the current SHLAA (Reference 597). I would though take this opportunity to reiterate its immediate availability and stress that there are no constraints to development. For the record the site is also sub-divided by a hedgerow, as indicated on the attached plan and should therefore be considered as one smaller site or a larger combined opportunity. On the basis that either options are strategic allocation I hope you can update your Call for Sites information accordingly. Additionally, these brief comments should be read to indicate the desired content of the Wiltshire Housing Site Allocation DPD with regard to future housing opportunities at Upavon.
- 293      Melksham      With regard to the Wiltshire Housing Site Allocation DPD and the desired content I note that your consultation notification letter also highlights the ongoing Call for Sites process. In that regard I have attached a copy of my letter of 10th February 2014 regarding land off Sandridge Common, Melksham. I would therefore wish to reiterate that this site should continue to be promoted to the SHLAA. The land is available immediately and there are no constraints to development. Over and above the updated promotion of this area of land as a logical extension to the growth of Melksham in this area, I would therefore respectfully request that the draft Allocations DPD should include this site.
- 294      General      Re: Wiltshire Housing Site and Chippenham Site Allocations DPDs, and Wiltshire Core Strategy Consultation on Schedule of Proposed Modifications and associated documents. The following comments are intended to serve two purposes as in the first instance the DPDs consultation is of course intended to discuss the scope of those documents. However, before commenting on what should be included in those draft documents there is a more fundamental concern raised by the Proposed Modifications. Specifically the various housing trajectors included with the proposed modifications, demonstrate the anticipated lag in the take up of housing land opportunities. There can be little confidence though that the Site Allocations Development Plan Documents will not compound the Council's slippage in supply. These are in themselves reliant on 'community-led planning policy documents', as yet to be formulated, and by their nature responsive in nature and content. It cannot be right for the Council to claim they now have a five-year housing land supply on the basis of future allocations, which

had not previously been reliable. In that regard the DCLG's online Planning Practice Guidance has altered the basis for prematurity arguments against development proposals, which previously were dependant on 'exceptional circumstances'. It is reasonable to therefore expect the need to tie more than one plan together, at local and community levels, to delay the much needed review of settlement boundaries and various allocations. Not only is the Council's indicated approach inherently slow, and in many cases outwith their control, but the flexible approach described at TPL4 (para 3.6) has not been evidenced by the Council's actions recently, or historically. The National Planning Policy Framework (NPPF) is not prescribed by reference to a settlement's defined boundaries, as part of any development plan framework. The advice at paragraph 55 is more clearly concerned with the provision of sustainable rural housing, only requiring 'special circumstances' to be presented where 'isolated' new housing is proposed. In other circumstances the sustainable impacts of rural housing are the principal consideration. Recent discussions with the Council's development control officers though, with regard planning application for single dwellings on land immediately adjoin two different settlement framework boundaries, identified in the time spent North Wiltshire Local Plan 2011, and in the face of the Inspector's 10th Procedural Letter, which noted that these boundaries do not reflect the prevailing physical circumstances, have indicated a slavish adherence to 'those boundaries-and a desire to resist any development outside the historic boundaries in principle. Obviously the advice of paragraph 14 to the NPPF, along with paragraph 55, and the acknowledged fact that the historic village boundaries are out of date should weigh heavily in favour of the support for the modest growth of all the villages. At item TPL12, (paragraph 4.29) it is said that infill development within the built up areas of small villages will accommodate appropriate growth. On the basis that this description of those areas suitable for development can be simply described means it is equally reasonable to apply the same approach to the larger villages, either by reference to the built up area, or the settlement's physical limits. Over and above the representation outlined above regarding the Core Strategy's Proposed Modification it is understood that at this initial stage the purpose of the consultation with regard to the Wiltshire Housing Site Allocation DPD is to consider the scope of the documents. There is there, as stated above, a cross over in the relevant comments. Notwithstanding the potential therefore to advance the housing supply in rural areas without relying on a full review of all the settlement boundaries, by simple reference to all village's built up or physical limits, distinct from the open countryside, if the settlement framework boundaries are still to be relied upon I have taken this early opportunity to indicate an obvious change at Heddington which should be included in the draft DPD, reflecting the surrounding built development.

295 Little Panell Wiltshire Core Strategy Consultation on Schedule of Proposed Modifications and associated documents. The following comments are intended to serve two purposes as in the first instance the DPDs consultation is of course intended to discuss the

scope of those documents. However, before commenting on what should be included in those draft documents there is a more fundamental concern raised by the Proposed Modifications. Specifically the various housing trajectories included with the proposed modifications, demonstrate the anticipated lag in the take up of housing land opportunities. There can be little confidence though that the Site Allocations Development Plan Documents will not compound the Council's slippage in supply. These are in themselves reliant on 'community-led planning policy documents', as yet to be formulated, and by their nature responsive in nature and content. It cannot be right for the Council to claim they now have a five-year housing land supply on the basis of future allocations, which had not previously been reliable. In that regard the DCLG's online Planning Practice Guidance has altered the basis for prematurity arguments against development proposals, which previously were dependant on 'exceptional circumstances'. It is reasonable to therefore expect the need to tie more than one plan together, at local and community levels, to delay the much needed review of settlement boundaries and various allocations. Not only is the Council's indicated approach inherently slow, and in many cases outwith their control, but the flexible approach described at TPL4 (para 3.6) has not been evidenced by the Council's actions recently, or historically. The National Planning Policy Framework (NPPF) is not prescribed by reference to a settlement's defined boundaries, as part of any development plan framework. The advice at paragraph 55 is more clearly concerned with the provision of sustainable rural housing, only requiring 'special circumstances' to be presented where 'isolated' new housing is proposed. In other circumstances the sustainable impacts of rural housing are the principal consideration. Recent discussions with the Council's development control officers though, with regard planning application for single dwellings on land immediately adjoin two different settlement framework boundaries, identified in the time spent North Wiltshire Local Plan 2011 I and in the face of the Inspector's 10th Procedural Letter, which noted that these boundaries do not reflect the prevailing physical circumstances, have indicated a slavish adherence to those boundaries-and a desire to resist any development outside the historic boundaries in principle. Obviously the advice of paragraph 14 to the NPPF, along with paragraph 55, and the acknowledged fact that the historic village boundaries are out of date should weigh heavily in favour of the support for the modest growth of all the villages. At item TPL12, (paragraph 4.29) it is said that infill development within the built up areas of small villages will accommodate appropriate growth. On the basis that this description of those areas suitable for development can be simply described means it is equally reasonable to apply the same approach to the larger villages, either by reference to the built up area, or the settlement's physical limits. Over and above the representations outlined above regarding the Core Strategy's Proposed Modification it is understood that at this initial stage the purpose of the consultation with regard to the Wiltshire Housing Site Allocation DPD is to simply consider the scope of the documents. There is though, as stated above, a cross over in the relevant comments. Notwithstanding the potential therefore to advance the housing supply in rural areas (at this time, without relying on the full scope of the suggested review of all settlement



boundaries), by simple reference to all village's built up or physical limits, distinct from the open countryside, if the settlement framework boundaries are still to be relied upon I have therefore also taken this early opportunity to indicate a small change at Little Panell which should be included in the draft DPD, reflecting the domestic features on the ground.

- 296 Purton Re: Wiltshire Housing Site and Chippenham Site Allocations DPDs, and Wiltshire Core Strategy Consultation on Schedule of Proposed Modifications and associated documents. Moving on to the Wiltshire Housing Site Allocations DPD it is noted that your consultation notification letter also highlights the on going call for sites. My client's (Hannick Homes) have already promoted their land to the rear of Jewels Ash in Purton to the SHLAA (Site No 1120), and are understood to have updated the relevant information by email dated 6th January 2014 direct. For completeness I have therefore appended an indicative layout plan which formed the basis of a recent village presentation and shows the true form of development achievable. The site is available for immediate development and there are no constraints to such development. On the basis that this site is a strategic allocation opportunity the updated information in respect of the Call for Sites should also be read to indicate the desired content of the Wiltshire Housing Site Allocation DPD with regard to future development opportunities at Purton.
- 297 Crockerton Re: Wiltshire Housing Site and Chippenham Site Allocations DPDs, and Wiltshire Core Strategy Consultation on Schedule of Proposed Modifications and associated documents. The following comments are intended to serve two purposes as in the first instance the DPDs consultation is of course intended to discuss the scope of those documents. However, before commenting on what should be included in those draft documents there is a more fundamental concern raised by the Proposed Modifications. Specifically the various housing trajectors included with the proposed modifications, demonstrate the anticipated lag in the take up of housing land opportunities. There can be little confidence though that the Site Allocations Development Plan Documents will not compound the Council's slippage in supply. These are in themselves reliant on 'community-led planning policy documents', as yet to be formulated, and by their nature responsive in nature and content. It cannot be right for the Council to claim they now have a five-year housing land supply on the basis of future allocations, which had not previously been reliable. In that regard the DGLG's online Planning Practice Guidance :has altered the basis for prematurity arguments against development proposals, which previously were dependant on 'exceptional circumstances'. It is reasonable to therefore expect the need to tie more than one plan together, at local and community levels, to delay the much needed review of settlement boundaries and various allocations. Not only is the Council's indicated approach inherently slow, and in many cases outwith their control, but the flexible approach described at TPL4 (para 3.6) has not been evidenced by the Council's actions recently, or historically. The National Planning Policy Framework (NPPF) is not prescribed by reference to a



settlement's defined boundaries, as part of any development plan framework. The advice at paragraph 55 is more clearly concerned with the provision of sustainable rural housing, only requiring 'special circumstances' to be presented where 'isolated' new housing is proposed. In other circumstances the sustainable impacts of rural housing are the principal consideration. Recent discussions with the Council's development control officers though, with regard planning application for single dwellings on land immediately adjoin two different settlement framework boundaries, identified in the time spent North Wiltshire Local Plan 2011, and in the face of the Inspector's 10th Procedural Letter, which noted that these boundaries do not reflect the prevailing -physical circumstances, have indicated slavish adherence to those boundaries and a desire to resist any development outside the historic boundaries in principle. Obviously the advice of paragraph 14 to the NPPF, along with paragraph 55, and the acknowledged fact that the historic village boundaries are out of date should weigh heavily in favour of the support for the modest growth of all the villages. At item TPL 12, (paragraph 4.29) it is said that infill development within the built up areas of small villages will accommodate appropriate growth. On the basis that this description of those areas suitable for development can be simply described means it is equally reasonable to apply the same approach to the larger villages, either by reference to the built up area, or the settlement's physical limits. Over and above the representations outlined above regarding the Core Strategy's Proposed Modification it is understood that at this initial stage the purpose of the consultation with regard to the Wiltshire Housing Site Allocation DPD is to simply consider the scope of the documents. There is though, as stated above, a cross over in the relevant comments. Notwithstanding the potential therefore to advance the housing supply in rural areas (at this time, without relying on the full scope of the suggested review of all settlement boundaries), by simple reference to all village's built up or physical limits, distinct from the open countryside, if the settlement framework boundaries are still to be relied upon I have therefore also taken this early opportunity to indicate a small change at Crockerton which should be included in the draft DPD, reflecting the domestic features on the ground, distant from the open countryside.

298

Cricklade

Re: Wiltshire Housing Site and Chippenham Site Allocations DPDs, and Wiltshire Core Strategy Consultation on Schedule of Proposed Modifications and associated documents. The following comments are intended to serve two purposes as in the first instance the DPDs consultation is of course intended to discuss the scope of those documents. However, before commenting on what should be included in those draft documents there is a more fundamental concern raised by the Proposed Modifications. Specifically the various housing trajectories included with the proposed modifications, demonstrate the anticipated lag in the take up of housing land opportunities. There can be little confidence though that the Site Allocations Development Plan Documents will not compound the Council's slippage in supply. These are in themselves reliant on

'community-led planning policy documents', as yet to be formulated, and by their nature responsive in nature and content. It cannot be right for the Council to claim they now have a five-year housing land supply on the basis of future allocations, which had not previously been reliable. In that regard the DCLG's Oiliine Planning Practice Guidance has altered the basis for prematurity arguments against development proposals, which previously were dependant on 'exceptional circumstances'. It is reasonable to therefore expect the need to tie more than one plan together, at local and community levels, to delay the much needed review of settlement boundaries and various allocations. Not only is the Council's indicated approach inherently slow, and in many cases outwith their control, but the flexible approach described at TPL4 (para 3.6) has not been evidenced by the Council's actions recently, or historically. The National Planning Policy Framework (NPPF) is not prescribed by reference to a settlement's defined boundaries, as part of any development plan framework. The advice at paragraph 55 is more clearly concerned with the provision of sustainable rural housing, only requiring 'special circumstances' to be presented where 'isolated' new housing is proposed. In other circumstances the sustainable impacts of rural housing are the principal consideration. Recent discussions with the Council's development control officers though, with regard planning application for single dwellings on land immediately adjoin two different settlement framework boundaries, identified in the time spent North Wiltshire Local Plan 2011, and in the face of the Inspector's 10th Procedural Letter, which noted that these boundaries do not reflect the prevailing physical circumstances, have indicated a slavish adherence to those boundaries and a desire to resist any development outside the historic boundaries in principle. Obviously the advice of paragraph 14 to the NPPF, along with paragraph 55, and the acknowledged fact that the historic village boundaries are out of date should weigh heavily in favour of the support for the modest growth of all the villages. At item TPL12, (paragraph 4.29) it is said that infill development within the built up areas of small villages will accommodate appropriate growth. On the basis that this description of those areas suitable for development can be simply described means it is equally reasonable to apply the same approach to the larger villages, either by reference to the built up area, or the settlement's physical limits. Over and above the representations outlined above regarding the Core Strategy's Proposed Modification it is understood that at this initial stage the purpose of the consultation with regard to the Wiltshire Housing Site Allocation DPD is to simply consider the scope of the documents. There is though, as stated above, a cross over in the relevant comments. Notwithstanding the potential therefore to advance the housing supply in rural areas (at this time, without relying ori the full scope of the suggested review of all settlement boundaries), by simple reference to all village's built up or physical limits, distinct from the open countryside, if the settlement framework boundaries are still to be relied upon I have therefore also taken this early opportunity to indicate a small change at Cricklade which should be included in the draft DPD, reflecting the domestic features and approved residential land on the ground distinct from the

open countryside.

299 Broad Town Re: Wiltshire Housing Site and Chippenham Site Allocations DPDs, and Wiltshire Core Strategy Consultation on Schedule of Proposed Modifications and associated documents. The following comments are intended to serve two purposes as in the first instance the DPDs consultation is of course intended to discuss the scope of those documents. However, before commenting on what should be included in those draft documents there is a more fundamental concern raised by the Proposed Modifications. Specifically the various housing trajectors included with the proposed modifications, demonstrate the anticipated lag in the take up of housing land opportunities. There can be little confidence though that the Site Allocations Development Plan Documents will not compound the Council's slippage in supply. These are in themselves reliant on 'community-led planning policy documents', as yet to be formed, and by their nature responsive in nature and content. It cannot be right for the Council to claim they now have a five-year housing land supply on the basis of future allocations, which had not previously been reliable. In that regard the DCLG's online Planning Practice Guidance has altered the basis for prematurity arguments against development proposals, which previously were dependant on 'exceptional circumstances'. It is reasonable to therefore expect the need to tie more than one plan together, at local and community levels, to delay the much needed review of settlement boundaries and various allocations. Not only is the Council's indicated approach inherently slow, and in many cases outwith their control, but the flexible approach described at TPL4 (para 3.6) has not been evidenced by the Council's actions recently, or historically. The National Planning Policy Framework (NPPF) is not prescribed by reference to a settlement's defined boundaries, as part of any development plan framework. The advice at paragraph 55 is more clearly concerned with the provision of sustainable rural housing, only requiring 'special circumstances' to be presented where 'isolated' new housing is proposed. In other circumstances the sustainable impacts of rural housing are the principal consideration. Recent discussions with the Council's development control officers though, with regard planning application for single dwellings on land immediately adjoin two different settlement framework boundaries, identified in the time spent North Wiltshire Local Plan 2011, and in the face of the Inspector's 10th Procedural Letter, which noted that these boundaries do not reflect the prevailing physical circumstances, have indicated a slavish adherence to those boundaries and a desire to resist any development outside the historic boundaries. Obviously the advice of paragraph 14 to the NPPF, along with paragraph 55, and the acknowledged fact that the historic village boundaries are out of date should weigh heavily in favour of the support for the modest growth of all the villages. At item TPL 12, (paragraph 4.29) it is said that infill development within the built up areas of small villages will accommodate appropriate growth. On the basis that this description of those areas suitable for development can be simply described means it is equally reasonable to apply the same approach to the larger villages, either by reference to

the built up area, or the settlement's physical limits. Over and above the representation outlined above regarding the Core Strategy's Proposed Modification it is understood that at this initial stage the purpose of the consultation with regard to the Wiltshire Housing Site Allocation DPD is to consider the scope of the documents. There is, as stated above, a cross over in the relevant comments. Notwithstanding the potential therefore to advance the housing supply in rural areas at this time without relying on a full review of all settlement boundaries, by simple reference to all village's built up or physical limits, distinct from the open countryside, if the settlement framework boundaries are still to be relied upon I have taken this early opportunity to indicate a small change at Broad Town which should be included in the draft DPD, reflecting the domestic features on the ground.

- 300      General      Reference: Response to Consultation: Scope and Content of the Draft Wiltshire HSA DPD I am writing to register my concern regarding the scope and content of the Draft Wiltshire HSA DPD. As part of the HSA DPD, I understand that settlement boundaries will be reviewed. However there appears to be an inconsistency between Core policy 1, 4.13 and 4.15 relative to the way in which the settlement boundary will be reviewed: Para 4.13: These settlement boundaries will be reviewed as part of the Wiltshire Housing Site Allocations and Chippenham Site Allocations DPDs, as set out in the Council's Local Development Scheme, in order to ensure they are up to date and can adequately reflect changes which have happened since they were first established. Para 4.15 "These settlement boundaries will also be reviewed as part of the Housing Site Allocations DPD as set out in the Council's Local Development Scheme, in order to ensure they remain up to date and properly reflect building that has happened since they were first established." We urge you to clarify than in the HSA process the definition used in 4.15 is adopted, and that physical changes only are used in the boundary review-rather than the policy change to define two previously physically separated areas as one.
- 301      General - Studley      Reference: Response to Consultation: Scope and Content of the Draft Wiltshire HSA DPD I am writing with reference to the review of settlement boundaries as part of the HSA DPD. There appears to be an inconsistency between Core policy 1, 4.13 and 4.15 relative to the way in which the settlement boundary will be reviewed: Para 4.13: These settlement boundaries will be reviewed as part of the Wiltshire Housing Site Allocations and Chippenham Site Allocations DPDs, as set out in the Council's Local Development Scheme, in order to ensure they are up to date and can adequately reflect changes which have happened since they were first established. Para 4.15 "These settlement boundaries will also be reviewed as part of the Housing Site Allocations DPD as set out in the Council's Local Development Scheme, in order to ensure they remain up to date and properly reflect building that has happened since they were first established." I consider it important that the boundary review only uses

physical changes, NOT policy changes to define two previously physically separate areas as one, such as has been the case with Studley and Derry Hill. Whilst accepting the constraints of the national planning framework and emerging core strategy, it is critical that the boundary review and the allocation process HSA DPD properly reflects the circumstance which existed before we were defined as a large village. I therefore urge you to clarify than in the HSA process the definition used in 4.15 is adopted.

- 302      General -  
Studley      Response to Consultation: Scope and Content of the Draft Wiltshire HAS DPD I am writing in response to the Council's consultation on the SA process. Whilst accepting the constraints of the national planning framework and emerging core strategy, it is critical that the boundary review and allocation process HSADPD properly reflects the circumstance which existed before we were defined as a large village. Until the core strategy is fully in place, as an interim measure some policies were saved from North Wilts local development Plan. These include for example distinct Studley and Derry Hill boundaries. In the Calne community Area Action Plan 2006-2014(updated in 2010) it was also stated "It was agreed that the villages of Derry Hill, Studley and Heddington, should receive only limited in fill housing development, appropriate for local housing needs." <http://www.Wiltshire.gov.ukccaP: update-2010.pdf>. The boundary review must therefore recognise and incorporate these previous policies. It should also recognise that large villages may comprise of distinct components with intermediate boundaries and gaps that should be respected.
- 303      General      Reference: Response to Consultation: Scope and Content of the Draft Wiltshire HSA DPD I am concerned about the potential effect on Wiltshire's rural environment of housing allocations for "Large Villages". I would urge that the scope of this document must cover the practical effect of housing site allocations within rural hamlets through the core strategy process, even where they have been aggregated with a larger neighbour and re defined as a "large village" for planning purposes. The strategy should respect and preserve the individual nature and character of the villages which are an essential part of Wiltshire life and heritage. In particular, the scope should address the scale and character of the village, and the impact of any natural boundaries or distinct "subsections" within a settlement that in whole or part has been newly defined as a large village for planning purposes.
- 304      General -  
Studley      Response to Consultation: Scope and Content of the draft Wiltshire HAS DPD I have concerns as to the practical effect of housing site allocations in smaller villages and hamlets, and in particular where deemed to be linked to a larger neighbour village/hamlet and re-defined as a "large village". Please ensure that the characteristics of the smaller villages are recognised, as are the existing boundaries, with preservation of the green spaces between them. I have particular reservations where infrastructures are unable to cope with potential large scale development, brought about only because of this linking and the

creation of artificial "large villages". For example linking the small Studley to the larger Derry Hill, could mean that it receives a development out of character to the size of the hamlet, resulting in traffic increases that narrow country lanes cannot accommodate. Developments of larger scale must be targeted at what are genuinely large villages or towns, with the appropriate infrastructures.

- 305      General -  
            Studley
- Reference: Response to Consultation: Scope and Content of the Draft Wiltshire HSA DPD I am writing in response to the Council's consultation on the HSA process. Whilst accepting the constraints of the national planning framework and emerging Core Strategy. I believe it is critical that the boundary review and the allocation process HSA DPD property reflects the circumstance which existed before the village of Studley was defined together with Derry Hill as a 'large village' for planning purposes (only). I understand that until the core strategy is fully in place, as an interim measure some policies were effectively "saved" from the North Wilts Local development Plan. These include for example, distinct Studley and Derry Hill boundaries. In the Calne community Area Action Plan 2006-2014 (updated in 2010) it was also stated "It has also been agreed that the villages of Derry Hill, Studley and Heddington, should receive only limited infill housing development, appropriate for local housing needs." [http://www.wiltshire.gov.uk/ccap-update 2010.pdf](http://www.wiltshire.gov.uk/ccap-update%202010.pdf) . In my view the boundary review should therefore recognise and incorporate these previous policies. It should also recognise that large villages may comprise of distinct areas with intermediate boundaries and gaps in development that should also be respected.
- 306      General -  
            Studley
- Reference: Response to Consultation: Scope and Content of the Draft Wiltshire HSA DPD As part of the HSA DPD, I understand that settlement boundaries will be reviewed. However there appears to be an inconsistency between Core policy 1, 4.13 and 4.15 relative to the way in which the settlement boundary will be reviewed: Para 4.13: These settlement boundaries will be reviewed as part of the Wiltshire Housing Site Allocations and Chippenham Site Allocations DPDs, as set out in the Council's Local Development Scheme, in order to ensure they are up to date and can adequately reflect changes which have happened since they were first established. Para 4.15 "These settlement boundaries will also be reviewed as part of the Housing Site Allocations DPD as set out in the Council's Local Development Scheme, in order to ensure they remain up to date and properly reflect building that has happened since they were first established." We urge you to clarify than in the HSA process the definition used in 4.15 is adopted, and that physical changes only are used in the boundary review-rather than the policy change to define two previously physically separated areas as one. My main concern is around the village we live in, namely Studley, being defined as a 'large village' for planning purposes with Derry Hill. The 2 villages are distinct in their character and physical size and need to remain individual in my view.

- 307      General -  
Barford St  
Martin      Ref: site S29 -Land at Mount Lane, Barford St Martin I wish to object to the possible development of the land on Mount Lane, Barford St Martin, for future residential use, for the following reasons: This area of Barford st Martin is particularly attractive, with thatched cottages and Grade 2 listed properties. A modern development, however sympathetically done, cannot help but detract from the unique character and appearance of this part of the village. Development here would rob the village of valuable amenity space. Village events are frequently held here (with full consent of the owners). Over the last 12 months these have included a dance, quiz night, village cream tea and our annual summer fete, which raise money for upkeep of the village and various community projects, as well being vital in maintaining the vibrancy and sense of community in our village. The open aspect of the neighbourhood is a particular defining feature of this area of Barford St Martin, and any development in this area would completely destroy this characteristic. The adverse effect of the development on the setting of listed buildings, including The Old Cottage and Barford House on Mount Lane. The loss of existing views from neighbouring properties would adversely affect the residential amenity of neighbouring owner:s. These neighbouring properties include, but are not limited to, Barford House, Mount Cottage, The Old Cottage, Primrose Cottage and Deerhayes. The proposed density of the site at 11 properties is unacceptably high. The proposed development would be completely out of keeping compared with existing development in the vicinity, which consists entirely of three and four bedroom character detached properties. Mount Lane and Short Lane are narrow single carriageway country lanes; there is substantial concern regarding access and road capacity should a development go ahead. It should also be noted that the land on Mount Lane is under multiple ownership, not single ownership as stated on your plans. The residents of Barford St Martin are actively working on a Village Design Statement I Neighbourhood Plan to help with future planning. This is a long and time consuming piece of work which has been underway since October 2012. The plan specifically acknowledges that Barford is not ear-marked for development and it will only support appropriate in-fill development. Nowhere on our Plans do we foresee developing on the land on Mount Lane which we see as essential to our neighbourhood for the aforementioned reasons. I do hope our Plans will be taken into consideration when considering such future developments. Any plans to develop this land will be met with the most vigorous resistance by the residents of Barford St Martin.
- 308      General -  
Barford St  
Martin      Ref: site 529 -Land at Mount Lane, Barford St Martin I wish to object to the possible development of the land on Mount lane, Barford St Martin, for future residential use, for the following reasons: This area of Barford st Martin is particularly attractive, with thatched cottages and Grade 2listed properties. A modern development, however sympathetically done, cannot help but detract from the unique character and appearance of this part of the village. Development here would rob the village of valuable amenity space. Village events are frequently held here (with full consent of the owners}. Over the last 12 months these

have included a dance, quiz night, village cream tea and our annual summer fete, which raise money for upkeep of the village and various community projects, as well being vital in maintaining the vibrancy and sense of community in our village. The open aspect of the neighbourhood is a particular defining feature of this area of Barford StMartin, and any development in this area would completely destroy this characteristic. The adverse effect of the development on the setting of listed buildings, including The Old Cottage and Barford House on Mount Lane. The loss of existing views from neighbouring properties would adversely affect the residential amenity of neighbouring owners. These neighbouring properties include, but are not limited to, Barford House, Mount Cottage, The Old Cottage, Primrose Cottage and Deerhayes. The proposed density of the site at 11 properties is unacceptably high. The proposed development would be completely out of keeping compared with existing development in the vicinity, which consists entirely of three and four bedroom character detached properties. Mount lane and Short Lane are narrow single carriageway country lanes; there is substantial concern regarding access and road capacity should a development go ahead. It should also be noted that the land on Mount Lane is under multiple ownership, not single ownership as stated on your plans. The residents of Barford St Martin are actively working on a Village Design Statement I Neighbourhood Plan to help with future planning. This is a long and time consuming piece of work which has been underway since October 2012. The plan specifically acknowledges that Barford is not ear-marked for development and it will only support appropriate in-fill development. Nowhere on our Plans do we foresee developing on the land on Mount Lane which we see as essential to our neighbourhood for the aforementioned reasons. I do hope our Plans will be taken into consideration when considering such future developments. Any plans to develop this land will be met with the most vigorous resistance by the residents of Barford St Martin.

309

General -  
Studley

We are writing in response to the consultation on the HSA process. Whilst accepting the constraints of the national planning framework and emerging core strategy, it is very important that the boundary review and the allocation process HSA DPD properly reflect the circumstances which existed before Studley/Derry Hill were defined as a large village. Until the core strategy is fully in place, as an interim measure some Policies were retained from the North Wilts Local Development Plan. For example there were distinct Studley and Derry Hill boundaries and these must continue to be maintained. In the Calne Community Area Action Plan 2006-2014 (updated in 2010) it was also stated" It has also been agreed that the villages of Derry Hill, Studley and Heddington should receive only limited infill housing development, appropriate for local needs". We consider that the new boundary review should recognise and incorporate these previous policies. It should also acknowledge that large settlements may be composed of distinct components within the current rural development envelope. Likewise the existing gaps surrounding adjoining communities should also be respected. We trust you will take these comments into account when



this matter is being reviewed.

- 310      General -  
            Studley
- I am writing in response to the Council's consultation on the HSA process. Whilst I accept the constraints of the national planning framework and emerging core strategy, I believe it critical that the boundary review and allocation process HSA DPD properly reflects the circumstances that existed before Studley and Derry Hill were defined as a large village. Until the core strategy is fully in place, as an interim measure some policies were "saved" from the North Wilts Local development Plan. These include for example, distinct Studley and Derry Hill boundaries. In the Calne community Area Action Plan 2006-2014 (updated in 2010) it was also stated "It has also been agreed that the villages of Derry Hill, Studley and Heddington, should receive only limited infill housing development, appropriate for local housing needs." <http://www.wiltshire.gov.uk/ccap-update-2010.pdf> The boundary review must surely therefore recognise and incorporate these previous policies. It should also recognise that large villages may comprise of distinct components with intermediate boundaries and gaps that should also be respected. In particular, the scope should address the scale and character of a hamlet and the impact of any natural boundaries or distinct "subsections" within a settlement that in whole or part has been newly defined as a large village for planning purposes. I hope that you can respect our concerns on this classification, especially without resident consultation at the time and re-consider retaining separate identities for both Derry Hill and Studley ... since the A4 has become an increasingly dangerous man-made boundary over recent years.
- 311      General
- Thank you for your letter dated 20th inst., inviting my comments on "housing growth" in the context of Wiltshire's prospective DPD. Throughout England (if not in the UK's other three parts) it is very widely recognised that we don't have an adequate number of residential properties -with the unhappy consequences that housing is 'over-priced' (as demand exceeds supply) and many people are prevented from living in adequate accommodation. Clearly, Wiltshire must play its part in addressing this serious social issue. The housing 'shortage' is really quite massive. It cannot be resolved by unambitious 'tinkering'. Instead, we must face up to the need to build residential properties, with supporting infrastructure, in places which we had hoped to retain for agriculture and pleasing landscape. There are very few places where a strident NIMBY voice will fail to complain about 'adventurous' proposals. I believe that our Prime Minister is thinking on sensible lines when he talks about "Garden Cities" -new towns which are sensitively designed to integrate the inter-connecting requirements for agreeable living quarters, work places, government services, transportation, and green spaces. With such thoughts in mind, I recommend that Wiltshire Council should give careful consideration to the prospects for using land on Salisbury Plain -land which is already surplus to military needs, or likely to become surplus during the coming years. Whilst the Army is always reluctant to release areas which they have held for

several decades, I hope that, as part of your current exercise, WC and MoD will be able to engage in some sensible dialogue.

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|-----|------------------------|--|
| 312 | Ashton<br>Keynes       | See attached submission.   |
| 313 | Kingston St<br>Michael | See attached submission.   |
| 314 | Oaksey                 | See attached submission.   |
| 315 | Ramsbury               | See attached submission.   |
| 316 | Worton                 | See attached submission.   |
| 317 | General                | The scope of this document must cover the practical effect of housing site allocations within rural hamlets through the core strategy process, even where they have been aggregated with larger neighbour and re-defined as large village for planning purposes. In particular, the scope should address the scale and character of the hamlet, and the impact of any natural boundaries of distinct subsections within a settlement that in whole or part has been newly defined as a large village for planning purposes. I appeal to you to fully consider this and also take into account the feelings of local residents in this matter.  |
| 318 | General -<br>Studley   | I feel I must write concerning the Councils consultation on the HAS process. I understand the constraints of the national planning framework and emerging core strategy but it is absolutely vital that the boundary review and the allocation process HAS DPD truly reflects the position which existed BEFORE we were defined as a large village. I believe some policies were saved from the North Wilts Local development Plan as an interim measure until the core strategy is finalised. For example these include distinct boundaries for Studley and also for Derry Hill. I thought it had been agreed that Heddington, Studley and Derry Hill would only receive limited infill housing and that village boundaries and gaps would be respected. Thank you for this opportunity to write. |
| 319 | General                | The scope of this document must cover the practical effect of housing site allocations within rural hamlets through the core strategy process, even where they have been aggregated within a larger neighbourhood and re-defined as a 'large village' for planning purposes. In particular, the scope should address the scale and character of the hamlet, and the impact of any natural  |

boundaries or distinct subsections' within a settlement that in whole or part has been newly defined as a large village for planning purposes. Whilst accepting the constraints of the national planning framework and emerging core strategy, it is critical that the boundary review and the allocation process HAS DPD properly reflects the circumstances which existed before a large village' for planning purposes was defined.

- 320            General            Reference: Response to Consultation: Scope and Content of the Draft Wiltshire HSA DPD As part of the HSA DPD, I understand that settlement boundaries will be reviewed. However there appears to be an inconsistency between Core policy 1, 4.13 and 4.15, relative to the way in which the settlement boundary will be reviewed: Para 4.13: These settlement boundaries will be reviewed as part of the Wiltshire Housing Site Allocations and Chippenham Site Allocations DPDs, as set out in the Council's Local Development Scheme, in order to ensure they are up to date and can adequately reflect changes which have happened since they were first established. Para 4.15 "These settlement boundaries will also be reviewed as part of the Housing Site Allocations DPD as set out in the Council's Local Development Scheme, in order to ensure they remain up to date and properly reflect building that has happened since they were first established." I urge you to clarify than in the HSA process the definition used in 4.15 is adopted, and that physical changes only are used in the boundary review The scope of this document must cover the practical effect of housing site allocations within rural hamlets through the core strategy process, even where they have been aggregated within a larger neighbourhood and re-defined as a large village for planning purposes The scope of this document must cover the practical effect of housing site allocations within rural hamlets through the core strategy process, even where they have been aggregated within a larger neighbourhood and re-defined as a large village for planning purposes The boundary review must surely therefore recognise and incorporate these previous policies. It should also recognise that large villages may comprise of distinct components with intermediate boundaries and gaps that should also be respected.
- 321            General            Thank you for your letter of 20 th March. I have just one general observation to make: Wiltshire is a fine county in which to live and care should be taken to avoid developments that would significantly damage its character and ambience. It follows that small pockets of land within towns and villages or immediately bordering currently policy limits and for which there is no realistic alternative use should be identified for residential development before consent is given to the building of sizeable estates that would transform the current environment.
- 322            General            I am in receipt of your recent letter re: notification of intention to prepare two new Development Plan Documents. It was very difficult to understand the purpose of the letter as it was so vague and had no meaning. I am aware of the so called Wiltshire Core Strategy which would appear to be a euphemism for house building projects in Wiltshire. As we already have large

number of developments locally either passed or in the process of consideration in the pipeline, I appreciate it must be very difficult to find any more sites. (Please do not use greenbelt). Some of these sites are of a considerable size and I would plead with you not to agree any more. Smaller developments of about 15 houses would be much more acceptable and not cause disruption to roads, schools etc. I am sure councils who have neighbourhood plans would be very helpful here. I realise you are under pressure from the government (it could all change at the next election), but please do your best to try and prevent our beautiful Wiltshire countryside being turned into a urban jungle.

- 323      General      I am writing in response to the Council's consultation on the HSA process. Whilst accepting the constraints of the national planning framework and emerging core strategy, it critical that the boundary review and allocation process HSA DPD properly reflects the circumstances which existed before we were defined as a large village. Until the core strategy is fully in place, as an interim measure some policies were "saved" from the North Wilts Local development Plan. These include for example, distinct Studley and Derry Hill boundaries. Re-defined as a large village for planning purposes and address the scale and character of the hamlet of Studley an the impact of any natural boundaries.
- 324      General      WILTSHIRE HOUSING SITE ALLOCATIONS DPD “ SCOPE OF DOCUMENT REPRESENTATION ON BEHALF OF STRATEGIC LAND PARTNERSHIPS BY TERENCE O ROURKE LTD APRIL 2014 1. Terence O Rourke Ltd has been appointed by Strategic Land Partnerships (SLP) to respond to the current consultation in respect of the scope of the Housing Site Allocations DPD. SLP retains a number of land interests across Wiltshire, none of which provide strategic sites within the modified draft of the Core Strategy. Hence, SLP will be promoting their sites for housing development through the DPD. 2. The scope of the DPD is identified as twofold: to support the delivery of growth set out within the emerging Wiltshire Core Strategy; and to review settlement boundaries around the principal settlements, market towns, local service centres in South Wiltshire, and large villages. 3. In this context, we note that the Core Strategy must identify sufficient sites to provide a 5-year housing land supply. The Core Strategy Examination Inspector refers to this in the 10th procedural letter dated 2 December 2013, as follows: I note from Table 3 of the Council s updated Housing Land Supply Statement that the Council considers that it has a deliverable housing land supply of some 11,164 homes for the period 2013-2018 which would represent in the region of a 5 year (+5%) housing land supply based on a requirement of approximately 42,000 homes. Such figures would need to be revisited and confirmed for the most up to date assessment to indicate consistency with national policy. Is it feasible, for example, to identify a broad disaggregation for each HMA whereby the early production of a Sites Allocation DPD could provide a means of providing the subsequent detail of site allocation? Such a process could be complementary to any neighbourhood planning

process currently underway or those which subsequently emerge and would supplement the planned CS Review. To ensure consistency with the Framework, I would need clarification as to how the LDS would be amended and how the housing land supply would be met against an increased housing requirement. 4. The matter of five year supply is likely to lead to the need for further strategic allocations in the Core Strategy, and SLP will be submitting representations to the current round of consultation in respect of those matters in due course. 5. Notwithstanding this position, there is also a need to identify and/or allocate sufficient land and sites to meet the full housing requirement to be set within the Core Strategy (42,000 dwellings) and the Inspector raises important points related to the scope of this DPD, in that the process: could be complementary to any neighbourhood planning process currently underway or those which subsequently emerge; and would supplement the planned CS Review. 6. Further, any DPD would still need to meet the requirements of the NPPF, in that it must be sound and to that effect must be positively prepared, justified, effective and consistent with national policy. Also that the sites identified must, at least, be developable, in accordance with paragraph 47, footnote 12, given that the Core Strategy must specifically address the immediate five year period and identify deliverable sites. 7. Equally, even where in broad compliance with the distribution strategy of any adopted Core Strategy, the Sustainability Appraisal must still demonstrate that reasonable alternatives have been considered and dealt with in a fair and comparable manner, contributing to the objectives of sustainable development. In this context we note that the SA to the Core Strategy supports Green Belt review, including potential additional review through the DPD – specifically in relation to Trowbridge, but also acknowledging, for example, that within the Bradford-on-Avon Community Area there may be potential impacts on the West Wiltshire Green Belt. 8. A number of key issues therefore emerge that must be covered by the scope of the DPD and acknowledged in developing the housing site allocations and policies therein: Flexibility must be introduced into the DPD so that sufficient developable sites are identified, providing sufficient land to meet at least the full residual requirements of the Core Strategy, so that the plan can adapt to rapid change, rather than risking becoming rapidly out of date. Opportunities for sustainable development must be taken, alternatives that are demonstrated to be sustainable (either through the SA or through planning history) must be allocated, in accordance with the presumption in favour of sustainable development. The DPD should be complimentary to neighbourhood plans. This means that the role of the DPD is not to be subservient to any neighbourhood plan and it does not necessarily need to conform to a neighbourhood plan. To be clear, opportunities for additional allocations at settlements where neighbourhood planning is taking place, cannot and must not be ruled out. The local planning authority remains bound, by law, to consider reasonable alternatives and could make additional allocations where those alternatives are demonstrated to be sustainable. Similarly, any neighbourhood plans that have been or are being produced which fail to acknowledge the need for such flexibility, and the complimentary role of the DPD, are at risk of being found unsound. The redrawn settlement boundaries,

including those around the market towns and large villages, must provide for flexibility and must not be used as a tool to defeat otherwise sustainable development. The process of settlement boundary review and site allocations must consider opportunities for development within the Green Belt, if these present the most sustainable opportunities available and if flexibility is to be introduced into the plan, which could require safeguarding of land from the Green Belt in order to meet longer term development needs (in accordance with paragraphs 84 & 85 of the NPPF).

325 Hilperton

See Attached.

326 Crudwell

Wiltshire SHLAA - Response to Call for Sites Land at Ridgeway Farm, Tetbury Lane, Crudwell I write on behalf of the landowner, in connection with the above site and the Council's on-going invitation to submit potential development sites in respect of the emerging Local Development Framework for Wiltshire. The above site is considered to have potential for housing. I enclose a completed version of Sites Submission Form. Further information is provided within this letter. The Site Location The site is located to the north of Tetbury Lane immediately adjacent to the settlement boundary for Crudwell. A Site Location Plan is enclosed for identification purposes. Crudwell is a large village which means it has some employment provision and local services and facilities. Thus, it is considered a suitable location for some incremental growth. Site Description The site is approximately 3.5ha and comprises a farmstead and paddock land associated with Ridgeway Farm. The farm buildings comprise a number of modern agricultural buildings that are of steel frame and concrete block construction. It is defined by mature hedgerow interspersed with trees along its boundaries. There are residential properties to the east beyond which is the main part of the village. There are also residential properties to the west, the majority of which front onto the Lane. To the north is open countryside. The site has a single vehicular access onto Tetbury Lane which forms the southern boundary of the site. Opportunities and Constraints The site was formerly a farmstead and associated agricultural land; it is no longer in use for agricultural purposes and is therefore available for development now. It does not fall within any landscape or environmental designation and it is in a low flood risk area. It is outside of the Crudwell Conservation Area and there are not any listed buildings within the immediate vicinity of the site. Technical surveys have been carried out which conclude that the site is of limited ecological value; it has negligible historical significance; it has no notable landscape features and makes limited contribution to the overall character of the area. In light of the above it is evident that the site has no significant development constraints. The site lies adjacent to a large village therefore considered wholly suitable for residential development. It is considered to have capacity for 50 dwellings. Status of the Land The National Planning Policy Framework states that for sites to be considered deliverable means they will be available, suitable and achievable. The site achieves each of these

requirements as set out below. Available The site is in single ownership and it is currently un-used. The site has no significant constraints which would delay commencement of development. Accordingly, there is full control and flexibility to release the land for residential development. Suitable The site has no significant development constraints, as identified above. In addition, the site is suitably located for development with good accessibility to local services and employment opportunities by sustainable modes of transport. Achievable Crudwell is an attractive settlement with an evident housing need. As such, the site represents a viable development which can be delivered relatively quickly. Conclusion The above demonstrates that land at Ridgeway Farm, Crudwell, is suitable for residential development. The site does not have any significant development constraints and will help achieve the Government's aim to boost significantly the supply of housing in sustainable locations. The site is available, suitable and achievable and thus satisfies the requirements of the Framework in terms of it being deliverable. It is therefore respectfully requested that the Council consider the merits of this site for housing in their Call for Sites for the emerging Development Plan Documents that will form part of the LDF.

- 327 Calne Regarding the Wiltshire Strategic Housing Land Availability Assessment that is currently being undertaken. In Appendix 3 for Calne Community area I wish to comment on Site 709: Land at Wenhill Heights, Wenhill Lane: I would draw to your attention the following Potential Suitability Constraints to Development in addition to Within a Minerals Resource Zone currently identified in the SHLAA assessment as viewed on Wiltshire.gov.uk 1) Site 709 is not currently assessable from the primary road network. Wenhill Lane is designated as a Public Footpath with private vehicle rights. Wenhill Heights /Marden Way is an undulating residential road with 7 turnings, heavily parked on the roadway and therefore hazardous for additional through/access traffic. 2) Site 709 is diagonally traversed (NW to SW approx) by the GPSS pipeline (Government Pipeline and Storage System) requiring 3 meter wayleaves/easement with indemnities for work within the 3 meters. 3) Also referring to the SHLAA Methodology September 2011 Table 5 Accessibility, Site 709 currently is not within 400 meters of a bus stop. I would ask that the site now be identified as Suitable subject to potential constraints and that the above constraints be clearly identified in any further issuing of the SHLAA for the Calne area. Further could you please tell me when the completed SHLAA will be made available - maybe via the Wiltshire Council Consultation Portal - for public comment as the information it contains potentially effects all the residents of Wiltshire.
- 328 General - Wenhill Lane I am emailing regarding the Wiltshire Strategic Housing Land Availability Assessment (SHLAA) that is currently being undertaken. In Appendix 3 for Calne Community area I wish to comment on Site 709: Land at Wenhill Heights, Wenhill Lane: I wish to object to any proposal for housing to be developed on this land. The housing area leading up to this site (Marden Way)

is all ready full with residents vehicles being parked on the road due to a lack of driveway parking and vehicular access to this site would be extremely difficult and dangerous. The landowner erected a steel gate to indicate that vehicular access is used however, we have lived here for 17 years and this has not been the case. We believe the gate was erected for the purposes of the SHLAA and would argue this has NEVER been used. There is poor vehicular access to the site. In the outline planning application for Silver Street (11/03628/OUT) the applicant wanted to build 60 houses on the field at the end of Marden Way which would mean that at least an additional 100 cars would be using either Wenhill Heights/Marden Way or Wenhill Lane. This would be in addition to the 101 houses that are currently being built on the Station Road development. The only access out would be through the roundabout at Station Road so with most homes having approximately two vehicles you could be looking at 300 EXTRA vehicles leaving this estate at the roundabout which would cause traffic chaos. It would also be dangerous as the fire engines would find access to their station difficult. Returning specifically to the land on Site 709, Marden Way or Wenhill Lane is suitable to carry extra traffic. In the application for phase 1 of the Silver Street Development (13/06774/REM) the following comment was made with regards to the erection of 18 allotments up the field from the lane: "The allotment proposal has a number of car parking spaces which would require access via Wenhill Lane. Our Warden says he has had a lot of issues with Wenhill Lane, it is only a footpath but illegal parking has sometimes prevented residents getting to their properties and the public have no legal right to drive on it unless they have the express permission of the landowner. It is very narrow and lorries to the depot at the sewage works would find access more difficult if there is an increase in traffic using the lane. There would be a negative impact on the safety of rights of way users. While the provision of the allotments is to be supported the proposed access is unacceptable, so for the above reasons we object to this part of the planning application. If Wenhill Lane is unsuitable access for 18 allotments then it is surely unsuitable for 60 houses." This would be true also for site 709. Wenhill Lane is a public right of way used by ramblers and dog walkers frequently. The access to the site via Marden Way would be EXTREMELY dangerous. Currently the council refuse truck has difficulty turning around and the access is simply not suitable for heavy construction traffic. Furthermore this is a residential area with many young children who play out in the streets on their bikes etc and this would be extremely dangerous for them. I also believe that this site was up for development circa 15 years ago and was dismissed due to the wildlife on this site, there were I believe protected bats and owls and other species that should be protected. Nothing has changed in the last 15 years or so with regards to the vehicular access or wildlife so I fail to see why this site would now be considered as a suitable site for building houses. Furthermore, I would draw to your attention the following Potential Suitability Constraints to development in addition to Within a Minerals Resource Zone currently identified in the SHLAA assessment as viewed on Wiltshire.gov.uk Site 709 is not currently assessable from the primary road network. Wenhill Lane is designated as a Public Footpath with private vehicle rights. Wenhill Heights /Marden Way is an undulating residential



road with 7 turnings, heavily parked on the roadway and therefore hazardous for additional through/access traffic. Site 709 is diagonally traversed (NW to SW approx) by the GPSS pipeline (Government Pipeline and Storage System) requiring 3 meter wayleaves/easement with indemnities for work within the 3 meters. Also referring to the SHLAA Methodology September 2011 Table 5 Accessibility, Site 709 currently is not within 400 meters of a bus stop. I would therefore request that based on the above comments that the site would now be identified as unsuitable subject to potential constraints and that the above constraint be clearly identified in any further issuing of the SHLAA for the Calne area. In addition could you please tell me when the completed SHLAA will be made available - maybe via the Wiltshire Council Consultation Portal - for public comment as the information it contains potentially effects all the residents of Wiltshire. I look forward to receiving your response

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| 329 | Yatton<br>Keynell          | <p>Wiltshire SHLAA and Housing Site Allocations DPD I write further to your email of 20th March 2014 in relation to the above. I am instructed by Mr and Mrs Hutton the owners of a site in Yatton Keynell to make the attached submission in response to your invitation. Please find attached a completed SHLAA questionnaire and a site location plan at scale 1:1250 showing the site bounded in red. My client's site measures 0.3ha and currently forms part of their domestic garden. Their house and part of their garden lies within the existing settlement boundary whilst a large part of their garden falls outside the settlement boundary. The site lies within the heart of the village within easy reach of a number of services including a school, doctors surgery, pub, village hall and local stores. The site could accommodate up to two additional units. Yatton Keynell is identified as a large village in the Core Strategy which means it could accommodate further development in the future if appropriate sites come forward as part of the housing sites DPD. My clients consider their site is suitable for residential development and would like it to be considered both as part of the Council's SHLAA process and the Housing Sites Allocation DPD. I understand that as part of the Housing Sites DPD the village settlement boundaries are being reviewed. My clients respectfully request that their site is considered as part of the settlement boundary review of Yatton Keynell. Much of Yatton Keynell and the surrounding land to the north, east and west, are designated as AONB. The AONB designation restricts the amount of land available for future development surrounding the village. The site the subject of this submission does not lie within the AONB. In light of the above, we consider this site is suitable for housing and respectfully request that it be considered favourably for both the SHLAA and Housing Allocation DPD.</p> |
| 330 | Alderbury &<br>Whiteparish | <p>This rep is also input as a SHLAA submission under rep number 45. WILTSHIRE HOUSING SITE ALLOCATIONS DEVELOPMENT PLAN DOCUMENTS (DPD): REPRESENTATIONS IN RESPECT OF HOUSING DELIVERY &amp; SETTLEMENT BOUNDARIES I act on behalf of the owners of land at Oaklea Lane, Alderbury and Romsey Road, Whiteparish. I have been asked to submit representations</p>   |

to you as part of the consultation on the future Site Allocations DPD. My clients' landholdings fall within settlements identified as Large Villages within the Wiltshire Core Strategy. However, they are beyond the settlement boundaries as previously defined in the Salisbury District Local Plan. The residential development potential of each site has previously been highlighted through the Strategic Housing Land Availability Assessment (SHLAA) process. Plans and the historic SHLAA appraisal summaries are attached to this letter. Could you therefore please also accept this letter of representation as a new SHLAA submission, as both of the sites remain available for development. In the context of my clients' interests, it is considered that a key issue for the DPD is the extent to which sites, such as the ones identified with this letter, can contribute to the overall housing requirement of the Southern Wiltshire Community Area. The importance of this is highlighted by the increase in the housing delivery targets from those set out in the Core Strategy Pre-Submission Document of 2012. This is demonstrated in the table on the following page. Table Area CS Pre-Submission Proposed Modifications Variation (February 2012) (From Exam 101, April 2014) Downton 1 190 190 0 Remainder 365425 +60 Community Area Total 555 615+60 Given that the figure for Downton has not changed, it is all the more important to identify and allocate sites for residential development in the larger villages. Wiltshire Core Policy 24 identifies these as: Alderbury Coombe Bissett Morgan' Vale I Woodfalls Pitton 5. Whiteparish Winterslow I Middle Winterslow Of these, Morgan's Vale I Woodfalls, Pitton and Winterslow I Middle Winterslow are in rural locations, with limited facilities, and at some distance from the strategic road network. However, Alderbury and Whiteparish are two of the larger settlements where additional development would support the existing facilities. They are also situated on or adjacent to main roads; the A36 in the case of Alderbury; and the A27 in the case of Whiteparish. It is considered important for the DPD to carry out a detailed Sustainability Appraisal of each of the larger villages, and for the allocation of suitable sites for development as a consequence of this work. In particular, the requirement to accommodate 425 dwellings on sites in the larger villages is likely to require settlement extensions and alterations to settlement boundaries, as there will be limited opportunities to accommodate substantial development through infilling or the re-development of existing sites and properties. The historic SHLAA's indicated that the subject sites have the potential to accommodate the following number of dwellings: Oaklea Lane, Alderbury -36 Ramsey Road , Whiteparish -54 These sites can therefore accommodate approximately 20%of the total required for the South Wiltshire Community Area. Each site is also of a sufficient size to accommodate the required quota of affordable housing, in accordance with Core Policy 43. Affordable housing delivery is also considered to be a key issue for the DPD to deal with. Whilst the Core Strategy sets out the principle policy framework, delivery will come from two main sources of supply; through direct development on large sites; and through the development of as yet unidentified sites, constructed following the 'pooling' of financial contributions from small sites. The latter is likely to be a longer process, whereas the former can provide a faster route to delivery. Thank you for the opportunity to submit these comments on the DPD. As set out earlier, would also be grateful if

you could register this continued interest on the SHLAA.

- 334            Salisbury            This rep is also input as a SHLAA submission under rep 49 WILTSHIRE HOUSING SITE ALLOCATIONS DEVELOPMENT PLAN DOCUMENTS (DPD): REPRESENTATIONS IN RESPECT OF HOUSING DELIVERY I act on behalf of the owners of land at Nadder Bank, Middle Street, Salisbury. I have been asked to respond to your invitation to make comment on key issues to be addressed in the future Housing Site Allocations DPD. The land owned by my clients is identified on the first plan attached to this letter. It currently falls just beyond the settlement boundary to the city. Historically, it was also identified as being in an area of potential flood risk. It is considered important that the City of Salisbury continues to act as the principal focus for development in South Wiltshire. The Core Strategy requires 6,060 new homes to be built in the period 2006 -2026. Taking into account housing already provided for (completions and specific permitted sites) and the strategic sites, land for the development of 340 dwellings still has to be identified. A review of the settlement boundary will assist in meeting the housing delivery target. In the specific case of the land at Nadder Bank, Middle Street, there has been a material change in circumstances to merit an alteration to the settlement boundary in this part of the city. In 2008, planning permission was granted to the Environment Agency for the construction of improved flood defences by way of the installation of new sheet piles, raising existing flood defence banks; and constructing new flood walls and banks. The effect of the implementation of this approval is to remove Nadder Bank from an area previously prone to potential flooding. The Flood Risk Assessment that accompanied the application contains two plans showing the extent of the flood risk area in a 1 in 200 year event -before construction of the new defences - and after. The plans are attached to this letter. It can be seen that Nadder Bank, together with other land to the north of Middle Street, is now afforded full protection from flooding. It is therefore submitted that the line of the improved flood defences can form one way in which the settlement boundary can be re-defined, thus opening up opportunities to develop land within the urban area so as to meet the required strategic housing target. Thank you for the opportunity to put forward representations on the scope of the DPD.
- 338            Corsham                Also input as a SHLAA submission at rep 99. Comments on the Wiltshire Housing Site Allocations Development Plan Documents (DPD). I am writing on behalf of GolDev who hold an interest in land in Corsham, and am providing comment on the scope of the DPD along with a completed call for sites form. GolDev have received verbal advice from officers at Wiltshire District Council that the site may be appropriate for an application during the course of this year, however, this position is being considered and therefore if the site can be considered through the call for sites we would be grateful. I have reviewed the scope for the document as set out on the Councils website, and I have set it out below for ease of reference. The scope of this

document is proposed to cover two key matters. Its primary role is to support the delivery of housing growth set out within the emerging Wiltshire Core Strategy. The document will identify sufficient land (in the form of sites) across Wiltshire to provide surety of housing delivery over the plan period to 2026. In addition to identifying sites for housing delivery, the document will review settlement boundaries, as defined in the emerging Wiltshire Core Strategy in relation to: the Principal Settlements of Salisbury and Trowbridge; Market Towns; Local Service Centres in the South Wiltshire Housing Market Area; and Large Villages. The plan will present proposals and associated policies designed to be in general conformity with the emerging Wiltshire Core Strategy and National Planning Policy Framework. It will consider sites in relation to the geographic area of Wiltshire, but excluding Chippenham. Growth at Chippenham is to be dealt with as a separate DPD. This Development Plan Document above all other requirements, needs to ensure that it meets with the NPPF's four tests of soundness. These tests ensure that the plans are positively prepared by being based on a strategy that seeks to meet objectively assess development and infrastructure requirements. The plan must be justified to ensure that it is the most appropriate strategy based on proportionate evidence. The plan must be effective in delivering development over its period and based on cross boundary strategic priorities and the plan must be consistent with national policies in ensuring the delivery of sustainable development. In summary, the National Planning Policy Framework establishes the following planning principles relevant to the consideration of the preparation of this development plan document. There is a presumption in favour of sustainable development; This presumption should be applied where local plan policies are out of date; Local planning authorities are required to plan to meet the full objectively assessed need for housing; Local planning authorities need to maintain a five year land supply of deliverable sites with an additional 5% buffer, or 20% where there is a persistent under delivery; Existing local plan policies can be used in decision making only where they remain up to date and consistent with the NPPF; The NPPF establishes a clear cost-benefit approach to the assessment of sustainable development. This cost-benefit approach should therefore be clearly present in Local Plan policies (including those adopted prior to the NPPF) for them to be considered to be in conformity with the NPPF, and continue to be given due weight in decision making; Emerging local plan policies can be afforded some weight, depending on the stage of plan preparation and level of objection. In regards to the relevant components of the emerging Core Strategy, Draft Core Policy 2 proposes the Delivery Strategy for Wiltshire. This includes planning for the delivery of a housing target of 37,000 homes for the period 2006 to 2026. This is significantly below the level of housing considered appropriate in the dRSS and has attracted significant objection in the hearing sessions to date, and therefore the DPD needs to address this short fall and ensure that the Council are working towards an acceptable housing target. Finally, Draft Core Policy 61 promotes the location of development in sustainable locations to reduce the need to travel and encourage the use of sustainable transport. Wiltshire Council has identified Corsham as a Market Town, and as such it is a settlement of sufficient size that is well provided with local amenities

and is a sustainable location to provide further housing. It is requested that particular regard is given to the development capacity of Corsham and its current settlement boundary. Thank you for allowing me the time to comment upon the scope for this document.

339 Alderbury Wiltshire Housing Site Allocations Development Plan Document (DPD) On behalf of our client, the Longford Estate, we are instructed to make comments on the scope of the Wiltshire Housing Site Allocations DPD. The Longford Estate control significant land holdings in South Wiltshire and our comments are submitted principally in the context of our client's site at Firs Road, Alderbury. Alderbury is identified as a Market Town within the Southern Wiltshire Community Area and is subject to the provisions of Core Policy 24 of the emerging Wiltshire Core Strategy. The site is considered to represent a sustainable and suitable location for development to meet identified housing needs and as such should be considered as an appropriate location within the forthcoming Site Allocations DPD site assessment. On behalf of the Longford Estate further representations on the Proposed Modifications to the Wiltshire Core Strategy will be made in due course, but it is considered necessary to make specific representations in response to the consultation on the scope of the Wiltshire Housing Site Allocations DPD. On the 2nd December 2013 the Examination Inspector wrote to the Council seeking the views of the Council on a number of key matters. A key area of concern identified by the Inspector was that the Council's evidence base, including the Strategic Housing Market Assessment (SHMA), does not support an objectively assessed housing need as low as 37,000 homes. Moreover, it was the Inspector's conclusion that the objectively assessed housing need for Wiltshire would be in the region of 44,000 homes for the Plan period (2006-2026). With reference to the Council's Sustainability Appraisal, which identified a range of between 35,800 and 42,100 new homes, the Inspector considered that the Core Strategy housing requirement should be expressed as a minimum figure towards the upper end of this range. In response the Council has set out Proposed Modifications which now make provision for at least 42,000 new homes in Wiltshire for the Plan period 2006-2026. The modifications to the Plan have significant implications for the disaggregation of housing across the three Housing Market Areas (HMAs) and the distribution of development within the Community Areas. The 10th Procedural Letter sought clarification from the Council as to how this change will be accommodated. A suggested approach from the Inspector was for the Council to prepare a Site Allocations DPD which would set out how the broad disaggregation of the increased housing provision for the three HMAs would be provided. This process could be complementary to any Neighbourhood Plan currently being prepared. Linked to this additional work identified the Inspector also raised concerns in respect of Settlement Boundaries. In the 10th Procedural Letter the Inspector expressed concern that the extent of the boundaries have not been reviewed in the preparation of the Wiltshire Core Strategy and that "it cannot be argued with great strength that the settlement boundaries contained therein are up-to-date for the

purposes of the CS plan period". The reliance placed on the Neighbourhood Planning process as the vehicle to deliver the necessary updates was criticised by the Inspector as there remains a considerable risk that such plans will not be delivered in a comprehensive and timely fashion across the County, which in turn could "potentially stymie development initiatives on the basis of an unjustified evidence base and therefore not represent a positive form of planning". In order to address this and to avoid delays to the adoption of the Wiltshire Core Strategy the Inspector suggested that there is scope to undertake such a review through the Site Allocations DPD. This recommended approach was subsequently accepted by the Council in the Council's response to the 10th Procedural letter (19th December 2013). The information pertaining to the "scope" of the Housing Site Allocations DPD is limited to that presented on the Council's website. We support the primary role of the DPD in that it is intended to be the delivery mechanism for increased housing provision as identified by the Examination Inspector by identifying sufficient land (sites) across Wiltshire to ensure an adequate supply of housing land is available over the Plan period. The scope of works set out on the Council's website identifies a "review" of Settlement Boundaries as being in addition to the primary site identification role of the DPD. The two processes are inextricably linked and one cannot be delivered without proper regard to the other. It is therefore recommended that the Scope of the works is amended to reflect the need to undertake a comprehensive review of Settlement Boundaries irrespective of overall housing provision. The Site Allocations DPD is not a capacity driven exercise rather it responds to the overall disaggregation of growth at the County's three HMAs as defined through the January 2014 'Methodology for Disaggregation of Increased Housing Requirement to Community Area and Housing Market Area Level. The disaggregation of the increased housing provision is intended to be provided whilst maintaining the integrity of the Spatial Strategy and current balance of growth in each area, with each part of the County to receive a "proportionate, pro-rata increase", although it is recognised that not all community areas will be able to accommodate a pro-rata increase. We raise no objection to the aspiration to maintain the Spatial Strategy across the County, however we are concerned that the tone of the "scope" has the potential limit the review of Settlement Boundaries to a process which is predicated on an identified housing provision, rather than a comprehensive review of the rationale of existing boundaries which we consider necessary to lock in flexibility to enable the delivery of housing at suitable and sustainable locations. The review of Settlement Boundaries should be undertaken in the context of the NPPF and the objective to boost significantly the supply of housing and the presumption in favour of sustainable development. The Scope of the DPD does not adequately consider the review of Settlement Boundaries in this context, the review should be a bottom up exercise which recognises and responds to need, which the Examination Inspector concluded was in fact higher than the 42,000 requirement set out in the Wiltshire Core, arising across Wiltshire and should be delivered in conformity with the Spatial Strategy. The failure to do so will result in a situation where Settlement Boundaries will artificially constrain sustainable development opportunities which is

inconsistent with the objectives of the NPPF. This is considered to be a critical point as the housing requirements for the HMAs and Community Areas are 'indicative' minimum figures. It is therefore important to ensure that Settlement Boundaries remain fit for purposes throughout the Plan period and do not become an obstacle to the delivery of sustainable development. On behalf of our client we also raise concerns in respect of the Council's approach to 900 dwellings which the January 2014 Methodology Paper (paragraph 2.2.) considers to be outside of this process as they have already been consented as specific schemes as part of the growth of the Swindon urban area. As a consequence the remainder figure (i.e. 42,000 minus the 900 dwellings) is disaggregated across the County. We cannot support the Council in this respect as the consequential reduction in the overall housing requirement for Wiltshire is inconsistent with the previously stated position by Wiltshire Council. Previous documents confirmed that any development at the West of Swindon is above and beyond that for Wiltshire. On this point paragraph 5.6 of Topic Paper 15 (Housing Requirement Technical Paper -Feb 2012), prepared in support of the Submitted Core Strategy, concluded that housing requirements for Wiltshire make no allowance for development at the West of Swindon and that: ". . . any further development (including that at Moredon Bridge) at the West of Swindon should be seen as being in addition to that required for Wiltshire alone". Furthermore, in support of the Examination of the Swindon Borough Local Plan a Statement of Common Ground was produced between Wiltshire Council and the Borough (April 2013) where, at paragraph 9 it was agreed that: "In respect of the Ridgeway Farm and Moredon Bridge consents, it is agreed that they contribute to the Borough's 5-year housing supply". It is therefore clear that the deduction of 900 homes from the overall target for Wiltshire is not supported by the stated position of Wiltshire Council. As such the 900 currently outside of this process homes should be included as part of the housing requirement for Wiltshire and its disaggregation across the three HMAs and Community Areas considered as part of the DPD process. In terms of the settlements to be considered as part of this DPD the scope of works suggests that only Local Service Centres in the South Wiltshire HMA will be considered. It should be made clear that Local Service Centres throughout Wiltshire will be considered as part of this process. Finally we are concerned that the Scope of the DPD does not adequately explain the relationship between the review of Settlement Boundaries and the Neighbourhood Planning process. To adequately respond to the concerns raised by the Examination Inspector the review of Settlement Boundaries must be comprehensive and just a mechanism to allocate sites. The DPD should be the primary mechanism through which the review is undertaken with Neighbourhood Plans (where in place) able to undertake further adjustments to respond to specific local issues. Further clarity on the role of Neighbourhood Plans and how such Plans relate to the DPD must be provided. The Site Allocations DPD provides the opportunity to respond to the issues identified by the Examination Inspector through a comprehensive review of Settlement Boundaries parallel to a site identification process which maintains the integrity



of the Spatial Strategy. We look forward to the opportunity to comment on future stages of the DPD.

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Market  
Lavington

Wiltshire Housing Site Allocations Development Plan Document (DPD) On behalf of our client, Persimmon Homes Wessex, we are instructed to make comments on the scope of the Wiltshire Housing Site Allocations DPD. Our clients are actively promoting the site at Fiddington Hill to the east of Market Lavington (site Location Plan attached). This site lies outside, but adjacent to the Settlement Boundary of Market Lavington. The Spatial Strategy for Wiltshire classifies Market Lavington as a Local Service Centre and is the most significant settlement outside of Devizes in the Community Area. As such the Fiddington Hill site represents a sustainable development opportunity consistent with the objectives of the NPPF with capacity to deliver up to 58 dwellings, contributing to the housing needs for the Community Area in manner which does not undermine the spatial strategy for Wiltshire. On the 2nd December 2013 the Examination Inspector wrote to the Council seeking the views of the Council on a number of key matters. A key area of concern identified by the Inspector was that the Council's evidence base, including the Strategic Housing Market Assessment (SHMA), does not support an objectively assessed housing need as low as 37,000 homes. Moreover, it was the Inspector's conclusion that the objectively assessed housing need for Wiltshire would be in the region of 44,000 homes for the Plan period (2006-2026). With reference to the Council's Sustainability Appraisal, which identified a range of between 35,800 and 42,100 new homes, the Inspector considered that the Core Strategy housing requirement should be expressed as a minimum figure towards the upper end of this range. In response the Council has set out Proposed Modifications which now make provision for at least 42,000 new homes in Wiltshire for the Plan period 2006-2026. The modifications to the Plan have significant implications for the disaggregation of housing across the three Housing Market Areas (HMAs) and the distribution of development within the Community Areas. The 10th Procedural Letter sought clarification from the Council as to how this change will be accommodated. A suggested approach from the Inspector was for the Council to prepare a Site Allocations DPD which would set out how the broad disaggregation of the increased housing provision for the three HMAs would be provided. This process could be complementary to any Neighbourhood Plan currently being prepared. Linked to this additional work identified the Inspector also raised concerns in respect of Settlement Boundaries. In the 10th Procedural Letter the Inspector expressed concern that the extent of the boundaries have not been reviewed in the preparation of the Wiltshire Core Strategy and that "it cannot be argued with great strength that the settlement boundaries contained therein are up-to-date for the purposes of the CS plan period". The reliance placed on the Neighbourhood Planning process as the vehicle to deliver the necessary updates was criticised by the Inspector as there remains a considerable risk that such plans will not be delivered in a comprehensive and timely fashion across the County, which in turn could "potentially stymie development initiatives on the basis of an unjustified evidence base and therefore not represent a positive form of planning". In



order to address this and to avoid delays to the adoption of the Wiltshire Core Strategy the Inspector suggested that there is scope to undertake such a review through the Site Allocations DPD. This recommended approach was subsequently accepted by the Council in the Council's response to the IOth Procedural letter (19th December 2013). The information pertaining to the "scope" of the Housing Site Allocations DPD is limited to that presented on the Council's website. We support the primary role of the DPD in that it is intended to be the delivery mechanism for increased housing provision as identified by the Examination Inspector by identifying sufficient land (sites) across Wiltshire to ensure an adequate supply of housing land is available over the Plan period. The scope of works set out on the Council's website identifies a "review" of Settlement Boundaries as being in addition to the primary site identification role of the DPD. The two processes are inextricably linked and one cannot be delivered without proper regard to the other. It is therefore recommended that the Scope of the works is amended to reflect the need to undertake a comprehensive review of Settlement Boundaries irrespective of overall housing provision. The Site Allocations DPD is not a capacity driven exercise rather it responds to the overall disaggregation of growth at the County's three HMAs as defined through the January 2014 'Methodology for Disaggregation of Increased Housing Requirement to Community Area and Housing Market Area Level. The disaggregation of the increased housing provision is intended to be provided whilst maintaining the integrity of the Spatial Strategy and current balance of growth in each area, with each part of the County to receive a "proportionate, pro-rata increase", although it is recognised that not all community areas will be able to accommodate a pro-rata increase. We raise no objection to the aspiration to maintain the Spatial Strategy across the County, however we are concerned that the tone of the "scope" has the potential limit the review of Settlement Boundaries to a process which is predicated on an identified housing provision, rather than a comprehensive review of the rationale of existing boundaries which we consider necessary to lock in flexibility to enable the delivery of housing at suitable and sustainable locations. The review of Settlement Boundaries should be undertaken in the context of the NPPF and the objective to boost significantly the supply of housing and the presumption in favour of sustainable development. The Scope of the DPD does not adequately consider the review of Settlement Boundaries in this context, the review should be a bottom up exercise which recognises and responds to need, which the Examination Inspector concluded was in fact higher than the 42,000 requirement set out in the Wiltshire Core, arising across Wiltshire and should be delivered in conformity with the Spatial Strategy. The failure to do so will result in a situation where Settlement Boundaries will artificially constrain sustainable development opportunities which is inconsistent with the objectives of the NPPF. This is considered to be a critical point as the housing requirements for the HMAs and Community Areas are 'indicative' minimum figures. It is therefore important to ensure that Settlement Boundaries remain fit for purposes throughout the Plan period and do not become an obstacle to the delivery of sustainable development A related point concerns the Council's approach to 900 dwellings which the January 2014 Methodology Paper

(paragraph 2.2.) considers to be outside of this process as they have already been consented as specific schemes as part of the growth of the Swindon urban area. As a consequence the remainder figure (i.e. 42,000 minus the 900 dwellings) is disaggregated across the County. We cannot support the Council in this respect as the consequential reduction in the overall housing requirement for Wiltshire is inconsistent with the previously stated position by Wiltshire Council. Previous documents confirmed that any development at the West of Swindon is above and beyond that for Wiltshire. On this point paragraph 5.6 of Topic Paper 15 (Housing Requirement Technical Paper -Feb 2012), prepared in support of the Submitted Core Strategy, concluded that housing requirements for Wiltshire make no allowance for development at the West of Swindon and that: ". . . any further development (including that at Moredon Bridge) at the West of Swindon should be seen as being in addition to that required for Wiltshire alone". Furthermore, in support of the Examination of the Swindon Borough Local Plan a Statement of Common Ground was produced between Wiltshire Council and the Borough (April 2013) where, at paragraph 9 it was agreed that: "In respect of the Ridgeway Farm and Moredon Bridge consents, it is agreed that they contribute to the Borough's 5-year housing supply". It is therefore clear that the deduction of 900 homes from the overall target for Wiltshire is not supported by the stated position of Wiltshire Council. As such the 900 currently outside of this process homes should be included as part of the housing requirement for Wiltshire and its disaggregation across the three HMAs and Community Areas considered as part of the DPD process. In terms of the settlements to be considered as part of this DPD the scope of works suggests that only Local Service Centres in the South Wiltshire HMA will be considered. It should be made clear that Local Service Centres throughout Wiltshire will be considered as part of this process. Finally we are concerned that the Scope of the DPD does not adequately explain the relationship between the review of Settlement Boundaries and the Neighbourhood Planning process. To adequately respond to the concerns raised by the Examination Inspector the review of Settlement Boundaries must be comprehensive and just a mechanism to allocate sites. The DPD should be the primary mechanism through which the review is undertaken with Neighbourhood Plans (where in place) able to undertake further adjustments to respond to specific local issues. Further clarity on the role of Neighbourhood Plans and how such Plans relate to the DPD must be provided. The Site Allocations DPD provides the opportunity to respond to the issues identified by the Examination Inspector through a comprehensive review of Settlement Boundaries parallel to a site identification process which maintains the integrity of the Spatial Strategy. We look forward to the opportunity to comment on future stages of the DPD.

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Devizes

Smiths Gore on behalf of the Society of Merchant Venturers submit the attached Call for Site forms and Site Location Plans at the following sites: Land west of Folly Road. SHLAA forms provided.

- 342 Heywood Those comments reflected the longstanding policy of Heywood Parish Council that none of the settlements in the Heywood Village ward should be regarded as villages for the purposes of the Development Plan. The Settlement Strategy of the Wiltshire Core Strategy is set out in Core Policy 1, and its application to the Westbury Community Area is set out in Core Policy 32, which identifies the categories into which each of its specified settlements falls (including Small Villages: Edington and Tinhead). None of the settlements in the Heywood Village ward are identified in Core Policy 32 as being within the settlement hierarchy of Core Policy 1, and hence in accordance with the introductory paragraph to Appendix F: List of settlement boundaries removed (and not being identified as "Small Villages" in List 1 and List 3), they are all to be regarded as "settlements outside the settlement hierarchy" set in and part of the open countryside. At the meeting held on 14 April 2014, it was agreed to respond to the current scope and content consultation that there should be no changes at all to that position.
- 343 General Wiltshire Housing Site Allocations DPD and Chippenham Site Allocations DPD We refer to your letter dated 20th March 2014 which was sent to a Mr Tindell at the former Pipeline Office, New Road, Hardley, Southampton, S045 3NN, would you please note the correct address now is as per this letter. Esso owns and operates two High Pressure Fuel pipelines across Wiltshire and enclosed are 1:50000 maps showing the approximate route of these pipelines. Where the pipelines cross private land there is a Deed of Grant in place which has provisions for protecting the pipelines with respect to physical damage and also development. We have also enclosed a copy of the Special Requirements for Working in Close Proximity to the pipelines which details procedures to ensure work is carried out safely near the pipelines. Whilst Esso does not object any development close to the pipeline obviously they wish to protect their interest, namely the pipeline and the wayleave associated with it, we look forward to any consultation when detailed plans are proposed. Should you require more information about the pipelines or more detailed route information please do not hesitate to contact Fisher German at the address on this letter.
- 344 General The scope of this document is proposed to cover two key matters. Its primary role is to support the delivery of housing growth set out within the emerging Wiltshire Core Strategy. The document will identify sufficient land (in the form of sites) across Wiltshire to provide surety of housing delivery over the plan period to 2026. In addition to identifying sites for housing delivery, the document will review settlement boundaries, as defined in the emerging Wiltshire Core Strategy in relation to: the Principal Settlements of Salisbury and Trowbridge; Market Towns; Local Service Centres in the South Wiltshire Housing Market Area; and Large Villages. The plan will present proposals and associated policies designed to be in general conformity with the emerging Wiltshire Core Strategy and National Planning Policy Framework. It will consider sites in relation to the geographic area of Wiltshire, but excluding Chippenham. ☒ We strongly disagree with the approach that seeks to limit the housing allocations

process to the larger settlements (classified as Principle Settlements, Market Towns, Local Service Centres and Large Villages) thereby excluding the smaller settlements classified as Small Villages. We have been advised by the Planning Policy Department that this is because the proposed Core Strategy only considers Small Villages suitable for small infill developments, and as such there is no requirement for housing allocations. The publication version of the Core Strategy is currently undergoing examination. Core Policy 2 of this document, after amendments proposed during the examination, states that At the Small Villages development will be limited to infill within the existing built area. Proposals for development at the small villages will be supported where they seek to meet housing needs of settlements or provide employment, services and facilities provided the development: i) respects the existing character and form of the settlement ii) the proposal does not elongate the village or impose development in sensitive landscape areas, and iii) does not consolidate an existing sporadic loose knit areas of development related to the settlement. For the purposes of Core Policy 2, infill is defined as the filling of a small gap within the village that is only large enough for not more than a few dwellings, generally only one dwelling. Exceptions to this approach will only be considered through the neighbourhood plan process or DPDs (our emphasis in bold). This policy wording therefore suggests an opportunity for exceptions to the small scale infill only approach via a DPD, which would include the Site Allocations DPD. However, if the Housing Site Allocations DPD excludes Small Villages the LPA is limiting the opportunity to do this, contrary to what the Core Strategy proposes. The approach to limit the allocations process in this way is contrary to recent Government guidance, as published in the National Planning Policy Guidance (NPPG) which states that Assessing housing need and allocating sites should be considered at a strategic level and through the Local Plan and/or neighbourhood plan process. However, all settlements can play a role in delivering sustainable development in rural areas “ and so blanket policies restricting housing development in some settlements and preventing other settlements from expanding should be avoided unless their use can be supported by robust evidence (our emphasis in bold). Whilst it may be correct that smaller settlements should not be the main focus of housing allocations to ensure that housing delivery is in alignment to the strategies set out in the Core Strategy, such settlements should not be excluded entirely from consideration for allocations without considering the opportunities for sustainably located and efficient uses of well-located land within them. In his review of Rural Economy and Affordable Housing, The Taylor Report (para. 12), Lord Taylor sets out at page 12 the problems caused by planning practices which have traditionally constrained the growth of smaller settlements: Restrictive planning practices are contributing to many villages and hamlets becoming increasingly unsustainable communities. While the country plans for major housing growth over the next decade, in practice these smaller villages are often excluded from local strategies ... (para.31) The report goes on to focus particularly on the problems created by the so-called Sustainability Trap whereby new development is prevented in smaller rural settlements because they are classified as being unsustainable due to the fact

that they do not have a defined set of services and facilities. As a result of a restriction on development these settlements actually become less sustainable; less economically sustainable as the housing needs of the local labour market are not met and there is less demand for village services; less socially sustainable as families are split-up due to high house prices and out-migration, while fewer village facilities such as shops can be sustained; and, less environmentally sustainable as commuting for work both into and out of small settlements increases as does the need to travel further to access local services. The pressing need to consider holistically the sustainability of rural settlements is outlined at page 26 of the report: Planning must not determine the future development of rural communities against a narrow tick-box approach to sustainable development, assessing communities as they are now and not what they could be. In too many places this approach writes off rural communities in a sustainability trap where development can only occur in places already considered to be in narrow terms sustainable. The question planners must address is how will development add to or diminish the sustainability of this community? , taking a better balance of social, economic, and environmental factors together to form a long term vision for all scales of communities. A mix of housing and employment opportunities are essential for the sustainability of rural communities. The approach to assessing the sustainability of villages based on a simplistic assessment of services also fails to acknowledge the functionality of some rural villages which have historically, and continue to, operate in a relationship with other nearby settlements and between them provide a sustainable network of access to services. The National Planning Policy Framework (NPPF) acknowledges that where there are groups of smaller settlements these can support each other, with new development in one settlements supporting development in an nearby settlement (para.55). This approach has not been reflected in this approach to allocations. In conclusion, the Wiltshire Housing Site Allocations DPD should be opened up to consider available and suitable sites in all sizes of settlements with a view to selecting the most suitable sites for future housing delivery, considering the strategic policies of the Core Strategy but also the need to ensure the delivery of commensurate levels of development in all settlements to ensure the future sustainability and viability of their communities. I trust the above comments will be taken into consideration in the progressing of the Wiltshire Housing Site Allocations DPD.

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Westbury

Following a meeting of the Westbury Town Council s Highways, Planning and Development committee on 30 th April 2014 it was agreed that the response to the above consultation is covered in the comments below: a) Maintain existing Town Policy Limit b) No further housing allocations wanted outside the Town Policy Limit c) To achieve our key priority of building the bridge between Mane Way and Station Road we would not want to see any additional housing allocations because they would undermine the H14 allocation which would enable the bridge. Achieving the bridge would also relieve Oldfield Road of horrendous traffic congestion, another priority. Should you require any further information please do not hesitate to contact

me.

- 346 Tuckingfold Re: Tuckingfold Field Site-Strategic Housing Land Availability Assessment Further to your email communication of the 20th March 2014, we write to lodge our field site for your consideration in your proposed identification of sites and review of settlement boundaries. This is a small site of 0.34 acres proposed for a single dwelling which we would like to develop for our own use. We have addressed the issue of access following our previous planning pre application of 2013 and hope this will assist our cause with outstanding issues of the village boundary, building in the garden, or the AONB. We accept that our possible development time table of occupation in 2016 is an ambitious one given your own LDS/DPD programme and the constraints above that still affect this site, but hope this application will not preclude our making further planning enquiries with Wiltshire Council Planning Authority. A site plan is attached showing the field bordered in blue and a further sketch showing proposed access. We would welcome your guidance re our application and look forward to further contact.
- 347 Alderbury Please see attached.
- 348 Devizes Smiths Gore on behalf of the Society of Merchant Venturers submit the attached Call for Site forms and Site Location Plans at the following sites: Roundway Park SHLAA forms provided.

## Appendix C: Consultation materials

Dear [Consultee Name],

### **Notification of Intention to Prepare Two New Development Plan Documents**

Wiltshire Council has published its intention to prepare the following Development Plan Documents (DPDs):

- Wiltshire Housing Site Allocations DPD; and
- Chippenham Site Allocations DPD.

To ensure development plans are as informed as possible from the outset of the preparation process, the Council is undertaking a consultation designed to seek representations on the proposed scope of such documents. The purpose of this letter is to invite such comments.

### **Wiltshire Housing Site Allocations DPD**

The scope of this document is proposed to cover two key matters. Its primary role is to support the delivery of housing growth set out within the emerging Wiltshire Core Strategy.

The document will identify sufficient land (in the form of sites) across Wiltshire to provide surety of housing delivery over the plan period to 2026.

In addition to identifying sites for housing delivery, the document will review settlement boundaries, as defined in the emerging Wiltshire Core Strategy in relation to: the Principal Settlements of Salisbury and Trowbridge; Market Towns; Local Service Centres in the South Wiltshire Housing Market Area; and Large Villages.

The document will present proposals and associated policies designed to be in general conformity with the emerging Wiltshire Core Strategy and National Planning Policy Framework. It will consider sites in relation to the geographic area of Wiltshire, but excluding Chippenham. Growth at Chippenham is to be dealt with as a separate DPD, as set out below.

### **Chippenham Site Allocations DPD**

The scope of this document is designed to ensure that specific development sites are allocated at Chippenham to fulfil the growth planned for the town over the period to 2026.

The document will also present policies designed to enable the delivery of priority regeneration schemes as set out in the draft Chippenham Town Centre Masterplan.

The document will include proposals and associated policies designed to be in general conformity with the emerging Wiltshire Core Strategy and National Planning Policy Framework. It will cover the geographic area of the Chippenham Community Area and parts of the Corsham and Calne Community Areas which are adjacent to the built area of Chippenham town.

### **Consultation arrangements**

If you would like to comment on the proposed scope of these documents, these should be submitted during the **6 week** consultation period, running from **Monday 24 March** until **Monday 5 May 2014**. Representations can be emailed to: [spatialplanning@wiltshire.gov.uk](mailto:spatialplanning@wiltshire.gov.uk). Alternatively, please send your representations to: Spatial Planning, Economic Development and Planning, Wiltshire Council, County Hall, Trowbridge, BA14 0HD.

Further detail in terms of the timetable for preparing these documents is set out in the Council's latest [Local Development Scheme](#).

### **Call for Sites**

The plan making process will involve the consideration of site proposals. If you have a site which you would like to be considered as part of this process, please let us know by completing the forms available on the Council's Strategic Housing Land Availability Assessment web site (address below).

<http://www.wiltshire.gov.uk/planninganddevelopment/planningpolicy/strategichousinglandavailabilityassessment.htm>

If you have any queries about this 'Call for Sites' please contact the Council's Monitoring & Evidence Team via email: [spatialplanningpolicy@wiltshire.gov.uk](mailto:spatialplanningpolicy@wiltshire.gov.uk). Alternatively, please call the Spatial Planning Team on 01225 713223.

Yours sincerely



Alistair Cunningham  
Associate Director  
Economic Development & Planning  
Wiltshire Council



## Appendix D: List of potential SHLAA sites as put forward in the call for sites

Area	Number of sites	Area	Number of Sites
Melksham	19	Amesbury	1
Calne	15	Bishops Canning	1
Westbury	8	Bradford On Avon	1
Purton	7	Broadchalke	1
Corsham	6	Bromham	1
Alderbury	5	Bulkington	1
Beanacre	5	Bushton	1
Chippenham*	5	Chirton	1
Cricklade	5	Colerne	1
Devizes	5	Collingbourne Ducis	1
Salisbury	5	Compton Bassett	1
Shrewton	5	Coombe Bissett	1
Lydiard Millicent	4	Corsley Heath	1
Malmesbury	4	Cotswold Community	1
Market Lavington	4	Crockerton	1
Marlborough	4	Great Bedwyn	1
Barford St Martin	3	Great Cheverell	1
Burbage	3	Harnham	1
Christian Malford	3	Holt	1
Quemerford	3	Kilminster	1
Ramsbury	3	Kingston St Michael	1
Sutton Benger	3	Little Panell	1
Trowbridge	3	Lydiard Tregoz	1
Urchfont	3	Mere	1
Whiteparish	3	Newtown	1
Yatton Keynell	3	Shaftesbury	1
All Cannings	2	Oaksey	1
Ashton Keynes	2	Royal Wootton Bassett	1
Broad Town	2	Rudloe	1
Chapmaslade	2	Seend	1
Crudwell	2	Semley	1
Donhead St Andrew	2	Tisbury	1
Edington	2	Tuckingfold	1
Heywood	2	Upavon	1
Hilperton	2	Warminster	1
Lyneham	2	Washpool	1
Minety	2	West Lavington	1
Pewsey	2	West of Swindon	1
Semington	2	Whitley	1
Sherston	2	Wilton	1
Yarnbrook	2	Winsley	1
Allington	1	Worton	1



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>