

Wiltshire Local Development Framework

Wiltshire Housing Site Allocations Plan

Statement of Early Community Engagement – Cabinet Version

Report on the Informal Consultation on the Site Assessment Methodology and Initial Site Options – December 2015

June 2017

Table of Contents

Chapter 1	Introduction	4
	Scope of the Housing Site Allocations Plan	4
	Approach taken in initial site assessment work	4
	Structure of this document	6
Chapter 2	Consultation methodology	7
	Consultation methods	7
	Consultation materials	8
Chapter 3	Representations	9
	Breakdown by subject of response	9
Chapter 4	Summary of the main issues raised by the representations	11
	Overview	11
	Theme 1: the approach to identifying potential ‘areas of search’	12
	Theme 2: The overall methodology	16
	Theme 3: The approach to Large Villages	21
	Area specific responses: feedback on initial sites/ options	24
	North and West Housing Market Area (HMA)	27
	East Housing Market Area (HMA)	46
	South Housing Market Area (HMA)	56
	Large Villages	65
	Developer and landowner comments and interest	67
	Summary of stakeholder engagement workshops/ briefing sessions	68
Chapter 5	Conclusions and next steps	71
	Actions	71
Appendix A:	Questions asked through the housing site allocations informal consultation	73
Appendix B:	Town and parish council consultations (stakeholder events and drop in sessions)	74
Appendix C:	Developer workshop	79
Appendix D:	Responses from the statutory consultees	87

Appendix E: Review of the site selection methodology 94

Chapter 1 Introduction

Scope of the Housing Site Allocations Plan

- 1.1. The purpose of the Wiltshire Housing Site Allocations Plan ('the Plan') is to support the delivery of at least 42,000 new homes as set out in the Wiltshire Core Strategy (adopted January 2015) (WCS) and to maintain a 5 year housing land supply between 2006 and 2026 (the plan period). At the time of the inception of the Plan, housing completions (16,385 homes) and commitments since 2006 (20,270 homes) left the Plan seeking to plan for at least 5,345 new homes up to 2026. New housing sites will need to be identified within each of the three Housing Market Areas (HMAs) in Wiltshire.
- 1.2. The scope of the Plan will address two key matters:
 - The document will identify sufficient land (in the form of sites) across Wiltshire to ensure delivery of the WCS housing requirement and maintain a five year housing land supply up to the end of the plan period to 2026, and
 - In addition to identifying sites for housing delivery, the document will review settlement boundaries, as defined in the adopted WCS in relation to: the Principal Settlements of Salisbury and Trowbridge; Market Towns; Local Service Centres and Large Villages.
- 1.3. The plan will present proposals and associated policies designed to be in general conformity with the adopted WCS and National Planning Policy Framework (NPPF) . It will consider sites in relation to the geographic area of Wiltshire, but excluding Chippenham. Growth at Chippenham is to be dealt with through a separate DPD.

Approach taken in initial site assessment work

- 1.4. The initial process of site assessment and selection of 'refined site options' for Principal Settlements, Market Towns and Local Service Centres followed a staged approach methodology to objectively assess the suitability of Strategic Housing Land Availability Assessment (SHLAA) sites within 'areas of search'.
- 1.5. The methodology was applied to those settlements that had a remaining housing requirement of 50 dwellings or more up to 2026¹. As a first approach, draft options

¹ It was considered that where areas had a requirement of below 50 dwellings to 2026, that windfall sites could deliver the remaining requirement in these locations.

were only identified in Principal Settlements, Market Towns and Local Service Centres².

- 1.6. The methodology applied could be broadly summarised in 3 overarching iterative stages, as follows:
- i. **Site identification** - The Council's SHLAA (July 2014) and other sites submitted through the call for sites exercise as part of the Plan's preparation was the starting point for site selection, as this indicates the availability of land for development at settlements.
 - ii. **Strategic constraints application** (e.g. Flood zones 2 and 3, Area of Outstanding Natural Beauty (AONB) designation, mineral safeguarding areas) - An assessment table was then created where all sites from stage (i) were considered against a set of strategic constraints (numerically scored). This afforded officers a quick sieve approach to help identify those sites that were heavily constrained and which could subsequently be excluded from the assessment process.
 - iii. **Further detailed assessment** - Following the application of the strategic constraints data, the remaining sites were scored against discretionary constraints (e.g. agricultural land classification, listed buildings, county wildlife sites, and accessibility) through an assessment table. The findings of more assessments (e.g. ecology, conservation) and information derived from site visits were used to refine the options further. Sustainability Appraisal (SA) was also used to consider the different merits of initial options generated and to inform the generation of refined options.
- 1.7. Following the application of the methodology through initial stage assessment work as outlined above, a number of issues emerged which helped to formulate the scope of the informal consultation exercise. These issues concerned:
- The approach to Community Areas - should the Council rigidly stick to required housing numbers within Community Areas or can these figures 'flex' across the HMAs and between Community Areas if required. For instance, should some Community Areas have the opportunity to increase their level of growth if desired or required.
 - The approach to the housing requirement – should the Council continue to only consider those areas with a housing requirement of 50 dwellings or more and is it appropriate for those areas with smaller requirements (below 50 dwellings) to rely on windfall to deliver this housing.
 - The approach to be taken in Wiltshire's Large Villages – should the Council be pro-actively planning for growth at Large Village locations through

² Through the informal consultation exercise, consultees were asked to provide their thoughts as to the most suitable approach to identifying sites in Large Villages and across Community Area Remainders

allocating sites in the Plan, through a policy approach to inform applications, or leaving it to emerging Neighbourhood Plans to deliver the required levels of growth.

- Should the Plan focus on allocating Previously Developed Land (PDL) alongside greenfield, or should PDL not be allocated and instead left for planning policy to inform/direct.

1.8. This report details the findings from the informal consultation through a discussion of the key points that arose in relation to the above issues, and will be used to inform the methodology and approach to site assessment work moving forward. The refined methodology can be found in Appendix E.

Structure of this document

- 1.9. Chapter 2 lists the various ways by which the council consulted upon the proposed site selection methodology, overall approach, and initial findings relating to the identification of potential housing allocations.
- 1.10. Chapter 3 provides a breakdown of the representations.
- 1.11. Chapter 4 summarises the key issues arising from the representations with officer comments.
- 1.12. Chapter 5 lists the proposed changes and sets out the next steps in the preparation of the Plan.
- 1.13. Appendix A contains a list of the questions asked through the housing site allocations informal consultation.
- 1.14. Appendix B sets out the town and parish council consultations (stakeholder events and drop in sessions)
- 1.15. Appendix C summarises the developer workshop.
- 1.16. Appendix D collates the responses from statutory consultees (i.e. English Heritage, the Environment Agency and Natural England)
- 1.17. Appendix E sets out the review of the site selection methodology

Chapter 2 Consultation methodology

Consultation methods

- 2.1. In developing the evidence to support the emerging Plan, it was agreed that a round of targeted, informal consultation³ should be undertaken to assist in determining the approach to be taken to identifying land for future housing.
- 2.2. Comments were invited on the proposed site selection methodology, overall approach, and initial findings relating to the identification of potential housing allocations during a six week informal consultation period between **Monday 23rd February and Tuesday 31st March 2015** (inclusive).
- 2.3. The primary focus for the consultation sought to offer an opportunity for consultees to comment on the methodology and approach to site selection, on the initial options generated, on the approach to determining the level of growth to be directed across HMAs and within Community Areas and on the approach to be taken with Large Villages.
- 2.4. Initial site allocation options at the Principal Settlements, Market Towns and Local Service Centres, in line with Core Policies 1 and 2 of the adopted WCS⁴, were presented through the consultation. However, as the indicative residual housing requirements set out in the WCS also cover Community Area Reminders, additional high-level assessments of SHLAA sites was also undertaken at the level of Large Villages in these areas. All of the initial findings from the work undertaken at this stage were made available to generate interest and help formulate a clear response to a series of specific consultation questions. Further details in relation to these questions are set out in subsequent chapters of this report.
- 2.5. Although the consultation was primarily targeted towards parish and town councils, the consultation materials were publicly available to view on the council's website; and comments were invited from all parties with an interest in the Plan. The consultation subsequently received significant public attention with a high volume of comments received specifically relating to the suitability of individual sites (see below for more information).
- 2.6. Parish and town councils were all directly notified of the consultation and invited to attend one of three briefing sessions held during February and March 2014 at Chippenham, Devizes and Salisbury. Parish and town councils were also offered the opportunity to attend one-to-one meetings with planning officers at the

³ Town and Country Planning (Local Planning) (England) Regulations; Regulation 18

⁴ [Wiltshire Core Strategy, January 2015](#)

Council's offices in Salisbury and Trowbridge. These were run to allow parish and town councils the chance to further understand what the proposals being considered would mean for their area, to give opportunity to discuss specific concerns or to pass on local knowledge regarding specific sites.

- 2.7. The Council was also keen to engage with landowners, developers and agents during this consultation and so held a 'Developer Forum' in Trowbridge on Thursday 5th March 2015. Developers and landowners were also encouraged to comment through the informal consultation exercise.

Consultation materials

- 2.8. The consultation was supported by background papers⁵ and a series of map-based products that doubled up as display materials for workshops.

⁵ [Wiltshire Housing Site Allocations DPD – Information Leaflet](#); [Wiltshire Housing Site Allocations DPD – Draft Site Selection Methodology](#); and [Wiltshire Housing Site Allocations DPD – Housing Supply Paper](#)

Chapter 3 Representations

- 3.1. In overall terms (i.e. including the feedback from the workshops) the consultation generated approximately 2,100 comments from 549 organisations and individuals. The main themes that emerged through the consultation were centred on options for housing sites at Trowbridge and specifically land within the ‘Hilperton Gap’ (161 comments); Salisbury, specifically site ‘SAL2’ (217 comments); and 1,700 other representations on the proposed methodology and other sites across Wiltshire.

Breakdown by subject of response

- 3.2. *Figure 3.1* below provides a breakdown of the responses by the percentage commenting on areas of the consultation.

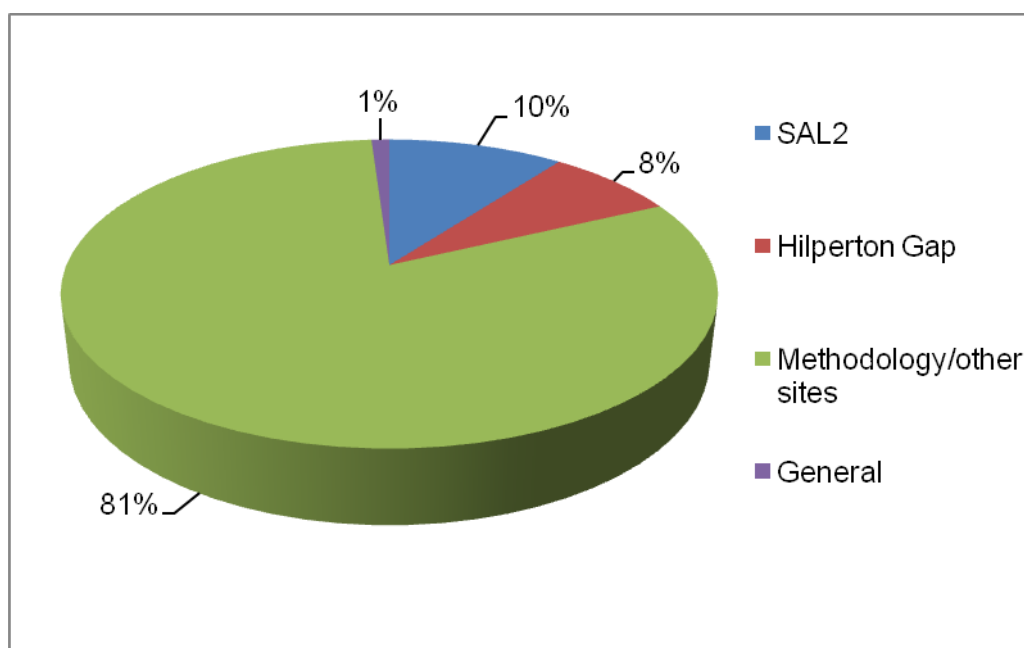


Figure 3.1 – breakdown of overall response by area of consultation

Chapter 4 Summary of the main issues raised by the representations

Overview

- 4.1. Through the informal consultation exercise, a series of questions were posed to help generate feedback on a number of specific topics, all of which were considered to go to the heart of developing the Plan. These questions are set out in full at Appendix A and discussed below.
- 4.2. The primary focus of the consultation centred on the approach employed towards identifying land as potential housing site allocations. As such, the consultation was designed to help consultees reflect on the methodology and offer refinements, where they were deemed necessary.
- 4.3. What follows is a summary of comments received in relation to the specific questions, grouped into themes, which were used to help guide the consultation process. For each question the key issues raised have been provided, along with a simple breakdown of how many people responded. At the end of each theme, a summary of key points is detailed – these key points will be used to help inform the methodology and approach to the Plan moving forward.

Theme 1: the approach to identifying potential ‘areas of search’ (Covering questions 1, 2 and 4)

Question 1 – Do you agree with the approach to identifying the potential ‘Areas of Search’ where new housing sites could be identified?

Areas of search					
Town and parish councils			Developers and landowners		
Support	Object	N/A	Support	Object	N/A
11	3	12	30	32	46

Table 4.1 – feedback on the approach to identifying potential ‘areas of search’

4.4. A total of 45 consultees made the following comments to question 1:

- The Plan should meet the full objectively assessed housing need (OAN) in line with national policy, not just the adopted Core Strategy requirement (6 comments).
- The housing requirement should not be viewed as a minimum (14 comments).
- The proposed methodology is unduly rigid and doesn’t appear to make allowances for local circumstances.
- Development should be positively enabled (in line national policy) where need requires, particularly in rural areas and villages where there may well be a sustainability argument for supporting appropriate levels of growth over the plan period.
- A more dispersed model should be considered allowing indicative housing requirements to be distributed to areas of least constraint.
- There should be more flexibility between HMAs and the Community Areas within individual HMAs (22 comments).

4.5. The Defence Infrastructure Organisation, Highways England and the Environment Agency broadly support the approach utilised to identify areas of search. Other statutory consultees made no specific comment.

Question 2 – Do you agree that we should not look for sites in areas of search that require less than approximately 50 dwellings (with the exception of Market Lavington and Cricklade Local Service Centres) to be provided over the remainder of the plan period to 2026?

Areas of search					
Town and parish councils			Developers and landowners		
Support	Object	N/A	Support	Object	N/A
7	5	12	8	53	46

Table 4.2 – feedback on whether to look for sites in areas of search that require less than 50 dwellings

4.6. The feedback received through the consultation suggests that there was some misunderstanding of what this question was asking, with some respondents interpreting the question as referring to excluding sites with a capacity of less than 50 dwellings rather than excluding areas of search with an overall indicative requirement of approximately 50 dwellings or less.

4.7. A number of developers made the following comments:

- The criteria applied may have excluded some suitable sites in certain locations.
- The figure of 50 dwellings is arbitrary and not justified, there may in fact be local support for identifying appropriately scaled sites in these areas and this should be examined in more detail (7 comments).
- The housing requirement should not be viewed as a minimum to be met and more flexibility should be introduced to ensure the council positively addresses housing supply in line with national policy (7 comments).
- The criterion does not support the NPPF’s presumption in favour of sustainable development (3 comments).
- There is too much reliance on ‘windfall development’ addressing supply. It would be more appropriate to positively plan for sites to meet the forecast requirements (4 comments).

Question 4 – Are there any other factors that should be used to inform the identification of Areas of Search or the level of growth to be provided?

4.8. A number of parish councils suggested the following factors should inform the approach to areas of search:

- All land should be assessed not just that promoted through the SHLAA.

- Surveys of local needs should be undertaken and used to help demonstrate why site options in certain locations are necessary.
 - The provision of infrastructure should be in place prior to development commencing.
- 4.9. A number of developers and landowners agreed with concerns raised by parish and town councils, suggesting that the following factors should inform the approach to identifying areas of search:
- Greater weight should be given to how sites perform against accessibility criteria (10 comments).
 - Further assessments must be undertaken to demonstrate whether potential site options are deliverable (4 comments).
 - Surveys of local needs should be undertaken and used to help demonstrate why site options in certain locations are necessary.

Summary of key points

- 4.10. There was a relatively equal split between support and objection to the approach to identifying areas of search (Q1). Developer comments focused on calling for more housing to be allocated in more locations to ensure flexibility in the plan.
- 4.11. There was a mixed response from town and parish councils to the criterion related to whether or not the draft Plan should be looking for site options in Community Areas requiring approximately less than 50 dwellings to be delivered over the period to 2026. Developers and landowners generally objected to this criterion on the ground that it is arbitrary and unjustified.
- 4.12. Matters to consider for taking the approach to areas of search forward:
- Maintain approach to dividing the HMAs into broad areas of search based on the WCS settlement hierarchy, the benefit of which is maintaining a clear line of general conformity with the WCS.
 - Whether an increased requirement should be enabled in any locations and, if so, why.
 - Whether any locations that have met their indicative housing requirement should be assessed to deliver further housing allocations.
 - For areas of search with an indicative housing requirement of less than approximately 50 dwellings for the remainder of the plan period – assess whether these areas are strategically required to:
 - help provide a level of assurance in terms of supply in the HMAs over the plan period; and, in doing so,

- how these areas will be treated in policy terms if further housing sites are not allocated; and therefore
 - whether there are reasonable opportunities within these areas to consider if we believe that we should not stick rigidly to the indicative housing requirements.
- 4.13. Due to changes in the level of housing completions and commitments since the WCS was adopted it may now be necessary to consider addressing the overall indicative housing requirements in each HMA on a more flexible, strategic base.

Theme 2: The overall methodology (Covering questions 5 and 6)

Question 5 – Do you agree with the methodology for identifying housing sites?

Overall methodology					
Town and Parish councils			Developers and landowners		
Support	Object	N/A	Support	Object	N/A
7	10	1	22	56	2

Table 4.3 – feedback on the methodology for identifying housing sites

4.14. This question, based on the overall methodology, generated a number of comments that replicated those presented against other questions:

- The housing requirements should be treated as a minimum and not a ceiling/limit on supply (22 comments).
- The proposed accessibility criteria require more thought (e.g. attributing greater weight to them); and greater clarity should be provided to aid interpretation (3 comments).
- Land within Mineral Safeguarding Areas (MSA) should be included for consideration and not be used to rule out sites as per the application of the council's proposed 'strategic criteria' – i.e. constraints (3 comments).
- General objection to not looking in areas of search where the indicative requirement to be delivered over the life of the Plan is currently less than 50 dwellings.
- Too much reliance on 'windfall sites' coming forward through the life of the Plan.
- More flexibility across and between areas of search is required (11 comments).
- More flexibility across and between HMAs is required.
- More Previously Developed Land (PDL) should be used in preference to greenfield sites (2 comments).
- Placing too much reliance on the use of PDL is not appropriate (2 comments).
- Too much weight is being attached to the application of desk-based, strategic constraints and numerical scoring of individual sites (3 comments).

- The suitability of potential sites should be considered on a site-by-site basis – for instance, their proximity to services, access, landscape impact etc. (3 comments).
- Greater transparency should be provided in relation to the background work that led to the generation of draft options.
- The proposed methodology for identifying sites must consider heritage assets (designated and un-designated) in line with national policy / guidance.
- Constraints on part of a site should not stop the unconstrained part of the site being assessed.

4.15. A number of parish councils made the following comments:

- The application of the scoring process has not been appropriately explained or applied consistently – i.e. some apparently low scoring sites have been taken forward in place of higher scoring sites. More detail over the scoring of individual sites is required.
- Some SHLAA sites appear to be wholly unsuitable for allocating as housing sites; and too many have been identified in Trowbridge.
- Criteria based methods for site selection should be used instead of a one size fits all approach.
- The approach to allocating sites should prevent coalescence between settlements/communities and safeguard the individual character of areas.

Question 6 – Are there any other factors that should be considered in the methodology that have not been taken into account?

4.16. A number of parish councils suggested the following factors should be taken into account in the methodology:

- The potential degradation of the local amenity value of land; and the enjoyment of such land by local communities.
- The potential for and impact of coalescence brought about by the allocation of land.
- Wherever possible, priority should be given to the allocation / development of PDL in favour of greenfield allocations (4 comments).
- More detail should be provided to explain how the accessibility thresholds have been utilised to help determine potential options.

- Infrastructure capacity in local areas should be a key factor in determining where sites should be allocated; and the level of investment required to address impacts on existing provision.
- Local knowledge should be taken into account, particularly on issues such as flood risk and drainage.
- Existing access and road capacity issues should be fully examined as part of the process of determining site options.
- Physical obstructions on land (e.g. electricity pylons) should not be scored as such factors can be addressed through the process of developing sites.

4.17. A number of developers and landowners suggested the following factors should be taken into account in any revision to the proposed methodology:

- Protected open space
- Coalescence
- Priority should not be given to 'PDL first'
- Planning gains and regeneration opportunities should be positively accounted for
- Greater weight should be given to accessibility, access to primary schools, leisure facilities
- Assessment of locals services, particularly in Large Villages where new development could lead to securing the future viability of such services
- Market attractiveness and subtle variations across HMAs / settlements
- Impacts on residential amenity
- Conservation area appraisals
- Heritage protection and enhancement opportunities
- Landscape assessments
- Contingency if neighbourhood plans are found to fail the basic conditions test through subsequent examinations
- Employment land reviews
- Deliverability / viability
- Community facilities (protection and enhancement)
- The need to positively plan for sites in Small Villages
- Infrastructure capacity and potential for enhancement
- Reference to national policy / guidance.
- The specific requirements of certain organisations, – e.g. Sport England does not support allocations on sports pitches.

Summary of key points

4.18. Seven out of the seventeen parish and town councils who responded to the consultation supported the proposed methodology for identifying potential site

options and 10 objected. The majority of the responses from developers and landowners also objected (56), with only 22 responses in support. From a developers and landowner perspective there was significant opposition to the general approach/ methodology towards identifying potential site options. Some key reasons were:

- Too much weight being applied to desk based analysis and scoring mechanisms.
- The suitability of individual sites should be assessed on their own merits and not combined with other sites to construct 'artificial' options.
- Reconsideration necessary of some criteria including accessibility and how it is applied / measured.
- The application of certain criterion, such as - MSAs should be reconsidered as it is not clear why land has been discounted in the 'first sieve stage'.

4.19. Consultees felt that certain aspects of the methodology for assessing SHLAA sites needed to be reconsidered, these include:

- A thorough review of accessibility criteria and how they are applied through the assessment of individual sites. The primary concern here relates to a need to check the status of the criteria applied when assessed against national policy / guidance and best practice.
- A review of how MSAs are used as a constraint to development at the 'first sieve stage'. The primary concern here relates to the need to ensure that approach taken in the adopted Wiltshire and Swindon Minerals Development Framework is applied consistently, but flexibly to ensure that reasonable site options are not simply ruled out before further assessments are utilised to judge their suitability for inclusion in the draft Plan.
- To consider whether more priority can be given to promoting the use of previously developed land (PDL) in settlements by allocating it for development in preference to greenfield sites. The corollary of this process will also need to assess the degree to which PDL needs to be allocated in the Plan as the national and local policy position on such matters currently supports the development of such land as a priority in any event.
- To review the scoring mechanism applied through the 'discretionary criteria' ('second sieve') stage. The primary concern here is simply geared to ensuring a consistent, transparent and defensible position is applied to the assessment of site options before 'preferred options' are finalised for inclusion in the draft Plan.

- To review the approach taken in terms of grouping sites into ‘options’. The primary concern here is the need to ensure that sites are assessed on their individual merits and only grouped into en-bloc allocations if considered absolutely necessary. The approach to addressing this element of the consultation feedback should consider the need, or otherwise for grouping. This may be possible and sensible for certain settlements in order to address infrastructure deficits for instance, but other areas may not offer the same degree of precision. In such circumstances – e.g. in the Principal Settlements and Market Towns, consideration should be given to simply assessing / allocating sites to address supply requirements rather than seeking to group them. The rationale for this approach to assessment is based on the fact that individual sites are often in individual ownership and hence grouping them could lead to issues of commerciality.
- To consider whether the factors listed above in response to Q6 should be incorporated into the methodology.
- To consider how and, indeed, whether ‘local needs assessments’ can be fed into the process. Further dialogue with local communities and colleagues from the Council’s New Housing Team will be required to clarify the position in relation to these matters.

Theme 3: The approach to Large Villages (Covering question 3)

Question 3 – Should the plan identify sites for growth within all, some or none of the Large Villages identified in Table 1 (of the leaflet) or if not, what mechanism should be used to identify sites in these settlements?

Large Villages					
Town and parish councils			Developers and landowners		
Support	Object	N/A	Support	Object	N/A
14	1	15	43	2	64

Table 4.4 – feedback on whether to identify sites within Large Villages

4.20. A number of developers made the following comments:

- A criteria-based policy would be supported if this would assist the process of considering potential land for housing at Large Villages (10 comments).
- The uncertainty around the ability of neighbourhood plans to deliver housing is a significant concern (5 comments).
- Allocations may not be needed in every Large Village, as each one presents more, or less opportunity to grow when considered in the context of local policy constraints. However, a consistent approach towards considering growth in the Community Area Remainder should nonetheless be applied (2 comments).
- Site allocations play an important role in the delivery of affordable housing and supporting local infrastructure (2 comments).
- Support should be given to identifying allocations in Small Villages on the basis of sustainability (1 comment).

4.21. A number of town and parish councils made the following comments:

- Support must be given to neighbourhood plans as a fundamental mechanism for delivering local housing sites (3 comments).
- Local knowledge should be used to identify sites (2 comments).
- Allocations may not be needed in every Large Village (2 comments).

4.22. A number of other stakeholders made the following comments which largely reiterated the points made by others (e.g. through the workshops):

- Appropriately evidenced allocations at Large Villages should be supported as they will help address the need to significantly boost supply across Wiltshire's HMAs (and in particular, Community Area Remainders) and thereby help address the shortfall in housing numbers set out in the adopted WCS (29 comments).
- Objection to allocating sites at Large Villages on the basis that the growth should be directed to larger settlements (2 comments).
- Concern about the scale of growth at some Large Villages (2 comments).
- It is fair and consistent to allocate sites in villages, or parish areas not preparing neighbourhood plans (1 comment).
- The allocation of land for housing should be left to neighbourhood plans (1 comment).

Summary of key points

4.23. The feedback from the consultation presents support for the allocation of new housing sites in Large Villages on various grounds including: the need to address supply in Community Area Remainders to address the indicative housing requirements in the WCS, through to issues relating to equity, choice and opportunity in all communities to secure a future in sustainability terms. The level of support from developers and landowners is possibly to be expected, but it was useful to receive positive support from town and parish councils and other respondents who presented their views on this part of the consultation.

4.24. That said there is also a clear level of support for neighbourhood plans in terms of addressing housing need at the local level. This is acknowledged and will continue to be supported in line with Core Policy 2 of the WCS.

4.25. Currently, WCS policies; CP2, CP44, CP46 and CP47, allows new housing developments to come forward outside of Large Village boundaries where they are identified in a neighbourhood development plan, or in a site allocations plan.

4.26. Matters that will need to be considered in terms of developing the evidence to support the draft Plan will include.

- The relationship between the emerging Plan, neighbourhood plans and local community aspirations in respect of growth potential in Large Villages.
- Ensuring that the Plan provides an appropriate level of additional housing to bolster supply in each HMA. In doing so, the Plan should take its lead from

the WCS (Table 1, CP1, CP2 and Community Area Strategies). Failure to take forward a holistic approach to meeting such matters will potentially lead to under-supply and / or unreasonable burden being placed on Principal Settlements, Market Towns and Local Service Centres to carry the indicative housing requirements for Community Area Reminders.

Area specific responses: feedback on initial sites/ options

4.27. The consultation presented opportunity for people to comment on a range of initial site options. The feedback received was strongly polarised towards two areas / sites within the county which generated disproportionately high levels of response. These areas / sites are:

- Site 'SAL2', Salisbury – 217 objections from the general public and other consultees.
- The 'Hilperton Gap' (three sites) – 161 objections from the general public and other consultees.

Site SAL2, Salisbury

4.28. Site SAL2 in Salisbury is located on Britford Meadows. There were 217 objections to the potential allocation / development of this site. In total 214 objections were from members of the public; 2 objections were from the Civic Society; and 1 was from a local school.

4.29. The reasons for the objections can be summarised as:

- Potential exacerbation of local flood risk;
- Exacerbation of traffic congestion and associated issues;
- Poor access / egress;
- Loss of local amenity;
- Degradation of views from the cathedral towards the meadows (iconic views);
- Loss of green space;
- Impact on wildlife;
- Exacerbation of drainage issues;
- Loss of irreplaceable water meadows/views; and
- Impact on the gateway to the city/effect on tourism.

Next steps

4.30. Review the potential suitability of site SAL2 in light of the issues raised.

The Hilperton Gap, Hilperton/ Trowbridge

4.31. Sites 263, 293 and 297 are located in the locally described – 'Hilperton Gap' on the north-eastern edge of Trowbridge. The objections centred on the following themes:

- Loss of local amenity / greenspace was of principle concern to the majority of respondents – e.g. many people use the gap to walk their dogs.

- The Hilperton gap is seen as a ‘green lung’ that Wiltshire Council promised would never be developed.
- Developing the land would lead to an unacceptable loss of wildlife habitat.
- Issues with infrastructure in the area – principally relating to road capacity and impacts associated with increasing levels of traffic, high speed limits, noise and degraded air quality.
- Wider infrastructure issues within the area and Trowbridge moreover – lack of doctors surgeries; school capacity issues (particularly at secondary level); and a loss of green space/ recreation land.
- Lack of employment opportunities in the area should be considered.
- The area is prone to flooding and has drainage issues.
- Development of the site would lead to coalescence between Trowbridge and Hilperton, an issue of particular local concern.
- Greater priority should be applied to the use of PDL / brownfield land in the town centre.
- Trowbridge is taking too much of the development ‘burden’ and other towns / Large Villages in the local area (and Wiltshire as a whole) should take their fair share.
- Development of the land would result in a conflict of interest as Wiltshire Council owns some land in The Gap.
- Concerns over how development of the land would fit within the local housing stock in the area.
- Concerns over the development of the land leading to inappropriate levels of high density housing in the area, particularly in the affordable sector of the market.

Next steps

- 4.32. Review the suitability of sites 263, 293, 297 in light of the issues raised.

Other area specific comments

- 4.33. In response to the consultation, a number of parishes undertook detailed assessment of their areas and it has been suggested that this information should be fully assessed and used to help determine the suitability of sites in certain locations.

- 4.34. In addition, for those communities progressing with, or thinking about neighbourhood plans, concerns were raised over the relationship between ‘strategic’ and ‘local’ level planning. The primary concern here related to the need to support neighbourhood planning and allow such work to bring forward suitable levels of housing, particularly in Community Area Remainers. In order to address these particular concerns, it is suggested that work will be undertaken to assess: the timetables for those neighbourhood plans in progress; and level of housing provision being planned for. This work will assist in determining the degree to which additional sites will need to be allocated in certain locations, to address the speed with which housing sites are being delivered through the planning process.
- 4.35. However, it will be vitally important to ensure that appropriate relationships are developed with Parish and Town Councils in order to reduce the risk of undersupply borne out of a lack of certainty for developers, landowners and local communities, neighbourhood plans and this Plan.
- 4.36. A number of developers and landowners used the consultation to submit new sites and put forward additional, detailed information in relation to their sites. This information will need to be fully assessed, particularly in terms of answering questions over site deliverability.

North and West Housing Market Area (HMA)

Warminster Town

Town and parish council comments	
Warminster Parish Council	<ul style="list-style-type: none"> • Would not support any sites being identified in the DPD for Warminster town. • The draft neighbourhood plan has been published for consultation (it does not allocate sites) prior to submission to Wiltshire Council later this year.
Developer and landowner comments and interests	
Planning Sphere (556400)	<ul style="list-style-type: none"> • Promoting land at Bore Hill Farm for low carbon housing linked to energy being supplied from the existing anaerobic digestion facility.
Planning Sphere (556098)	<ul style="list-style-type: none"> • Promoting land at Boreham Mead.
Hallam Land (644496)	<ul style="list-style-type: none"> • Promoting land east of Warminster. • Objects to the exclusion of Warminster as an area of search for housing sites.

Table 4.5 – Summary of comments and key issues for Warminster

4.37. General issues:

- A masterplan is currently being developed for the proposed urban extension west of Warminster. This Plan will ascertain the capacity of the Strategic extension and whether it should be limited to 900 dwellings (as per the WCS), or deliver up to 1200 dwellings. If there is a remaining indicative housing requirement for the area following this assessment, then the site identification methodology will need to be applied to the immediate area along with any available sites adjoining Warminster town.

4.38. Next steps:

- If, after consideration of the quantum to be delivered in the strategic allocation, it is determined that an additional amount of housing is required in the town, then the site identification methodology will be applied to available SHLAA sites in the area.

Westbury

Town and parish council comments	
	None
Developer and landowner comments and interest	
Amec for Robert Hitchins Ltd (ID329)	<ul style="list-style-type: none"> Promotion of land to the north of Bitham Park, Westbury. There appears to be a clear contradiction between the intent and methodology in the Council's approach to identifying / assessing sites. The 'intent' is supported however the 'strategy' is not as a number of the most sustainable market towns have been overlooked on the basis that supply in the area has apparently been met by recent planning permissions. Greater flexibility is required in those areas that appear to have met their local supply requirement on the grounds of sustainability. The approach should be geared more towards identifying the right sites, in the right location to boost supply in each HMA. The Council does not currently have a five year land supply; there is a significant 'drop off' in supply beyond the five year horizon. Strategic sites have to deliver infrastructure and for Westbury the strategic site will deliver beyond the 5 years. The strategic site in Westbury is not viable and highly constrained, and other strategic sites within the HMA with NP's are not at examination stage.
Pearce Land & Development Planning (ID224)	<ul style="list-style-type: none"> Westbury has been excluded from the Potential Areas of Search while being identified in the Core Strategy as a market town with a strategic allocation.
Bluestone Planning (ID333)	<ul style="list-style-type: none"> Promotion of land to the north of Bitham Park, Westbury. The site is available, deliverable, benefits from an enclosed landscape setting and lies immediately adjacent to the urban area. Further evidence of the wider assessment of the capacity of Westbury / Westbury Leigh can be demonstrated and information provided.
Persimmon Homes (ID351)	<ul style="list-style-type: none"> Promotion of Leigh Park, Westbury (SHLAA ref. 268), for further information please see the additional material submitted alongside this representation. Promotion of Fairdown Avenue, Westbury (SHLAA ref. 272), for further information please see the additional material submitted alongside this representation. Promotion of Land at Mane Way, Westbury (SHLAA ref. 3205), for further information please see the additional material submitted alongside this representation.
Landowner, 25 The Ham, Westbury (ID127)	<ul style="list-style-type: none"> Promotion of land at 25 The Ham, Westbury.
Planning Sphere (ID353)	<ul style="list-style-type: none"> Promotion of site 3375 - Turnpike Field, Old Dilton Lane, Westbury for approximately 80-90 dwellings.
Planning Sphere	<ul style="list-style-type: none"> Promotion of Land north of Shallow Waggon Lane, Westbury for

(ID357)	approximately 80-90 dwellings - as an alternative to further development at Trowbridge (approximately 3.8 ha / circa 80-90 dwellings).
Planning Sphere (ID360)	<ul style="list-style-type: none"> Promotion of SHLAA 3218 Land at Frogmore Road, Westbury for approximately 150 dwellings - noted as alternative to further development at Trowbridge (approximately 5.2 ha / circa 150 dwellings).
Planning Sphere (ID 368)	<ul style="list-style-type: none"> Promotion of SHLAA 250 Former Westbury Community Hospital Site, Westbury (The total proposed development area is approximately 2.3ha / circa 60 units).
Nexus Planning (ID367)	<ul style="list-style-type: none"> Supports, in part, the approach to identifying areas of search. Flexible approach rightly provides scope to review settlement boundaries. Criteria for identifying areas of search are highly restrictive and not flexible. Indicative remaining requirements in some areas are out of date and should be re-visited for Westbury and Calne. Proposed criteria and resulting Table 1 is flawed and arbitrary. The Council should assess the relative merits of all available sites within the HMA - taking account of all relevant matters/ sustainable development principles. Overly restrictive in approach to areas of search, reliance on windfalls and the proposed search criteria. Not sufficiently thorough or appropriately flexible. Employment land review required.
Turley Associates (455)	<ul style="list-style-type: none"> Promotion of land at Glenmore Farm, Westbury - pre-application undertaken at site for 150 dwellings (around 150 dwellings).
Statutory consultees and other comments	
Campaign for Better Trowbridge, Bristol and Bath Travel to Work Area (ID198)	<ul style="list-style-type: none"> Why is it that Warminster and Westbury and Bradford on Avon are not in the list of maps?

Table 4.6 – Summary of comments and key issues for Westbury

4.39. General issues:

- Objection to the overall approach being applied to identifying ‘areas of search’.
- The Plan should be meeting the full, objectively assessed housing need, not just the WCS indicative requirements.

- The Plan should consider sites in areas where neighbourhood plans have reached examination stage (e.g. Pewsey) - as deliverability of neighbourhood plan sites has not been robustly tested.
- Objection to the criterion of not looking for sites in areas of search requiring less than 50 dwellings for the plan period.
- Objections to the methodology and distribution of development - community area requirement approach is too rigid and key settlements are not being considered despite market signals.
- Support for allocations to be made in Large Villages.
- More clarity required on how options are currently presented.
- Consideration should be given to flexing the housing requirements across the housing market area.
- Site thresholds should be revised down to consider those sites that have a capacity of lower than 5 dwellings.
- Objections to the methodology - consider it to be incomplete because it fails to deal with Westbury - Housing Supply paper - Paragraphs 396-397 of the WCS Inspector's Report state at least 1,615 homes (1,500 at Westbury and 115 elsewhere) are required in the HMA and this would "*....emerge reasonably through the sites DPD complementing any neighbourhood plans which arise.*" Request further details of the Westbury assessment be made available and an explanation for the exclusion of the relevant details from this current consultation exercise.
- The Plan should reconsider the approach towards the review / assessment of identified employment land.
- Too much reliance is being placed on WCS strategic sites that have not yet secured planning permission.
- It is not necessary to include (i.e. allocate) PDL sites within existing settlement boundaries.
- The brownfield first strategy is flawed.
- The proposed sites should be subject to SA.
- The indicative Trowbridge requirement is unachievable and could be delivered elsewhere in the HMA by allocating land at other Market Towns and Large Villages in the Community Area Remainder.

- Unimplemented / vacant employment land in Trowbridge should be reconsidered for housing.
- The assessment of the suitability of sites should include physical limitations, potential impacts on surroundings, market attractiveness, contribution to regeneration priority areas and impacts on residential amenity.

4.40. Site-specific issues – in total, 10 additional sites in Westbury were promoted by developers:

- Land to the north of Bitham Park, Westbury.
- Leigh Park, Westbury (SHLAA 268)
- Fairdown Avenue, Westbury (SHLAA 272)
- Land at Mane Way, Westbury (SHLAA 3205)
- Land at 25 The Ham, Westbury.
- SHLAA 3375 - Turnpike Field, Old Dilton Lane, Westbury
- Land north of Shallow Waggon Lane, Westbury
- SHLAA 3218 Land at Frogmore Road, Westbury
- SHLAA 250 Former Westbury Community Hospital Site
- Glenmore Farm, Westbury.

4.41. Next steps:

- Bearing in mind the indicative requirements for the town (see Table 1 of the Core Strategy and Table 6 of the Housing Land Supply Statement), revisit the initial options and continue with detailed appraisal work in relation to such matters as site deliverability.
- Assess additional sites promoted by developers (above).

Trowbridge

Town and parish council comments	
Trowbridge Town Council Comments	<ul style="list-style-type: none"> • Support the approach to areas of search but object to the criteria not looking in areas requiring less than 50 dwellings. • Support the methodology but object to the distribution of the housing requirement as the proportion allocated to Trowbridge is too high. • Some of the requirement for Trowbridge should be redistributed to allocate moderate growth to Large Villages within the community area and other settlements within other community areas. • Trowbridge Town Council support the following sites: <ul style="list-style-type: none"> - Central sites 206, 247 and 1018. - Part of the urban extension site 248. - Land east of Trowbridge – 256 and 292. - Land to the west of the Canal Road Industrial Estate – 425 - this land was previously allocated and had planning permission which has lapsed. - South of Trowbridge - 613. - Land south of Trowbridge - 1021 and 3260. • Trowbridge Town Council object to the following sites: <ul style="list-style-type: none"> - Land adjacent to the Hilperton Relief Road – sites 263, 293 and 297 because it is strategic green space for the town. - Land beyond the western boundary of Green Lane Woods, Biss Woods and the River Biss – sites 740, 261 and 262. - Development between the White Horse Business Park and North Bradley – site 298 because of coalescence. - Innox Hall – 203. - Cricket pitch – 246. - St James Hall and Rectory – 244. • Trowbridge Town Council has suggested the following sites should be considered: 192, 195, 200, 205, 609 (in the greenbelt), 617 (in the greenbelt), 1020 and 3247.
North Bradley Parish Council	<ul style="list-style-type: none"> • Objects to approach to areas of search. • Sites should be considered in all Large Villages. • Infrastructure should be provided prior to development commencing, such as the eastern bypass. <ul style="list-style-type: none"> • Object to the distribution of the housing requirement as the proportion allocated to Trowbridge Community Area is too high. • Objects to sites 613, 298, 261, 262 and 740 as the will lead to the coalescence of Trowbridge with North Bradley, Yarnbrook and West Ashton.
West Ashton Parish Council	<ul style="list-style-type: none"> • Objects to approach to areas of search. • Sites should be considered in all Large Villages. • Infrastructure should be provided prior to development commencing, such as the eastern bypass. <ul style="list-style-type: none"> • Object to the distribution of the housing requirement as the proportion allocated to Trowbridge Community Area is too high. • Objects to sites 613, 298, 261, 262 and 740 as the will lead to the coalescence of Trowbridge with North Bradley, Yarnbrook and West Ashton.
Developer and landowner comments and interest	

Persimmon Homes	<ul style="list-style-type: none"> Persimmon are supporting/promoting sites 263 and 293 (Hilperton Gap), 256 (east of Trowbridge) and 261 and 262 (south of the urban extension). Suggest consideration of the following site – land at West Ashton Road, Trowbridge (West Ashton Business Park).
Simon Fowler	<ul style="list-style-type: none"> Promoting site 425.
RPS/Taylor Wimpey	<ul style="list-style-type: none"> Promoting site 292 at Ashton Road. Site boundary has changed and needs amending.
LPC	<ul style="list-style-type: none"> Promoting site 291. Various technical documents available.
Planning Sphere/Ashford Homes Ltd	<ul style="list-style-type: none"> Promoting an alternative site, 290 in Hilperton.
GL Hearn Ltd/Gallagher Estates and Heron Land Development	<ul style="list-style-type: none"> Suggest that Hilperton is closely related to Trowbridge, that housing numbers are currently calculated to include those for Hilperton with Trowbridge and therefore sites in Hilperton should be considered as part of the site assessment process for Trowbridge. Promoting an alternative site, 296 in Hilperton.
Framptons	<ul style="list-style-type: none"> Promoting sites 263 and 297 in the Hilperton Gap.
Planning Sphere (on behalf of Newland Homes	<ul style="list-style-type: none"> Promoting site 3260, south of Trowbridge.
Planning Sphere, Coulston Estates	<ul style="list-style-type: none"> Promoting land at Drynham Lane, Trowbridge – site 613 for 200 dwellings Propose to develop a masterplan that may include remainder of site 613 and 248.
David Glasson Planning Ltd	<ul style="list-style-type: none"> Promoting an alternative site, 322 in North Bradley.
FJP Planning	<ul style="list-style-type: none"> Promoting site 1021, south of Trowbridge.
Statutory consultees and other comments	
West Wiltshire Scout Association	<ul style="list-style-type: none"> Object to site 262 due to impact on scout camp.
Wiltshire Wildlife Trust	<ul style="list-style-type: none"> Objects to sites south east of Trowbridge - sites 740, 261 and 262, due to significant European protected species issues relating to the occurrence of breeding and roosting sites for Bechstein's Bats in both Biss and Green Lane Wood nature reserves, and wider environmental considerations.
Campaign for Better Trowbridge	<ul style="list-style-type: none"> Objects to sites 261 and 262 due to the EU Habitats Directive. Objects to 298 due to potential coalescence of Trowbridge and North Bradley. Objects to sites 206 and 246 as they should be preserved for recreational space.
White Horse	<ul style="list-style-type: none"> Objects to 292, 256, 262 and 740 due to the potential impact on

Alliance	Bechstein's Bats.
Natural England	<ul style="list-style-type: none"> • Allocations near Biss and Green Lane Woods may be inappropriate due to potential impact on Bechstein's Bats.
General public	<p>161 people objected to development in the Hilperton Gap for the following reasons:</p> <ul style="list-style-type: none"> • Loss of amenity space concern – many people using the gap to walk their dogs. The Hilperton gap seen as a 'Green lung' that Wiltshire Council promised would never be developed. • Loss of wildlife. • Issues with infrastructure in the area – principally relating to road capacity, issues with increasing levels of traffic and high speed limits, noise and air quality. • Wider infrastructure issues with the area and within Trowbridge – lack of doctors surgeries, school capacity issues and a loss of green spaces/ recreation land. • Lack of employment opportunities in the area should be considered. • Area is prone to flooding and has drainage issues. • The potential for coalescence between Trowbridge and Hilperton was of particular concern. • Greater priority should be attached to the use of PDL. • Trowbridge is taking too much of the development 'burden'. • Conflict of interest as Wiltshire Council owns some land in the gap. • High density housing would not suit the area.

Table 4.7 – Summary of comments and key issues for Trowbridge

4.42. General issues:

- Due to potential limited capacity in Trowbridge consideration may need to be given to taking a more flexible approach within the North and West HMA by looking at other Market Towns and Large Villages.
- It has been suggested that Hilperton is closely related to Trowbridge and that sites in Hilperton should be included in the site assessment work for the town.
- Objections to development in the Hilperton Gap and to land between Trowbridge and North Bradley and West Ashton all raise the issue of coalescence of the main settlement with villages lying outside of the town. Coalescence is an issue that has been raised in a number of locations within the county and further work is required to develop an approach to coalescence on a place by place basis.

4.43. Site-specific issues:

- 161 people objected to development in the Hilperton Gap.

- The business case has now been agreed for the A350 Yarnbrook/West Ashton improvement scheme. Consideration needs to be given to how this impacts on sites 261 and 262.
- There are issues related to European protected species namely impact on roosting and breeding sites for Bechstein's Bats on the sites south and east of the Ashton Park urban extension that need to be taken into account (sites 292, 256, 261, 262 and 740).
- Amend boundary of site 292 to include additional land promoted through the SHLAA.

4.44. Next steps:

- Assess whether the housing requirement for Trowbridge can be met within the town and, if not, consider options for moving a proportion of the indicative requirement elsewhere within the HMA.
- Consider whether sites in Hilperton, in planning terms, should be considered as part of the site selection process for Trowbridge.
- Consider response to the issue of coalescence.
- Review all sites in light of the site specific comments made above including:
 - Sites 263, 293 and 297 in the Hilperton Gap.
 - Sites 613, 298, 261, 262 and 740 that would lead to coalescence of Trowbridge with North Bradley, Yarnbrook and West Ashton.
 - Sites 292, 256, 740, 261 and 262 in light of the proposed relief road route, impact on European protected species (bats) and impact on the scout camp.
- Assess new sites put forward including:
 - Land at West Ashton Road.
 - Sites suggested by Trowbridge Town Council 192, 195, 200, 205, 609 (in the greenbelt), 617 (in the greenbelt), 1020 and 3247.
 - Sites 290 and 296 in Hilperton.
 - Site 322 in North Bradley.
- Due to potential limited capacity in Trowbridge consideration may need to be given to taking a more flexible approach within the North and West HMA.
- Consideration should be given to allocating appropriate sites in the Large Villages within the Trowbridge Community Area Remainder.

- Trowbridge Town Council supports some sites but object to others and a detailed assessment is provided to justify their position. This includes objecting to the development of the Hilperton Gap.
- There are issues related to potential impacts on protected species, principally - Bechstein's Bats on the sites south and east of the Ashton Park urban extension that must be taken into account (site 262).
- Consideration needs to be given to the layout of the A350 Yarnbrook/West Ashton improvement scheme.

Corsham

Town and parish council comments	
Corsham Town Council (ID 297)	<ul style="list-style-type: none"> • Support the approach to areas of search but considers that the council should still identify sites in areas requiring less than 50 dwellings. • Support allocations in Large Villages • Support methodology for identifying housing sites • Town Council keen to preserve an undeveloped gap between Corsham town and outlying settlements, and between smaller individual settlements • Corsham Town Council broadly support site options identified (with exception of site 1101 – refined option 4) • Corsham Town Council do not support site 1101 (refined option 4 - Land south of Bradford Road) as they consider it should be retained as a green buffer between Corsham and Rudloe, have concerns over the findings of the mining assessment and believe that other sites are more suitable. • Note that a Neighbourhood Plan is in preparation • Note that remaining housing requirement in Corsham has reduced since publication of the Council's Housing Land Supply Statement 2014 (the Town Council's representation details the recently permitted sites) – Town Council consider that if either Bath Road or Bradford Road appeals are allowed, or if Rudloe 2 site given permission, then Corsham indicative requirement will have been met.
Developer and landowner comments and interest	
Land Value Alliances (ID 261)	<ul style="list-style-type: none"> • Promoting site 3250 (part of refined option 5)
Boyer Planning (ID 328)	<ul style="list-style-type: none"> • Promoting site 493 – land to the north of Brook Drive and west of Ladbrook Lane (representation provides assessment of site against strategic criteria)
Woolf Bond Planning (ID 332)	<ul style="list-style-type: none"> • Site assessment methodology should consider the relationship of the site to the existing settlement boundary and whether development of the site would result in coalescence between Corsham and neighbouring settlements • Promoting site 3149 (part of refined option 5) – land to the north of Leafield Industrial Estate • Note that site assessment excludes land at Potley Lane (part of site 479) although this site has planning permission. The intention is to provide a highway link through the Potley Lane site to site 3149 • Object to refined options 1, 2, 3 and 4
Redcliffe Homes / GL Hearn (ID 371)	<ul style="list-style-type: none"> • Consider that completions/commitments for Corsham should only include those within or adjacent to the settlement boundary • Promoting site 1101 (refined option 4) - Land south of Bradford Road • Object to refined options 1 and 2 as should be considered in rest of CA requirement
Gladman Developments (ID 394)	<ul style="list-style-type: none"> • Promoting site 3307 – Land north of Bath Road
Defence	<ul style="list-style-type: none"> • Consider that sites located within the Green Belt, AONB or Mineral

Infrastructure Organisation (ID 177)	Safeguarding Areas should only be discounted as an option where it has been established that alternative sites are available and deliverable <ul style="list-style-type: none"> • Promoting site 2081 (refined option 2) • Promoting site 3034 (refined option 3)
Statutory consultees and other comments	
	<ul style="list-style-type: none"> • N/A

Table 4.8 – Summary of comments and key issues for Corsham

4.45. General issues:

- Corsham’s remaining indicative housing requirement is out of date, as a result of recent permissions.
- Disagreement around whether permissions around Corsham should count towards Corsham town requirement.
- Local Town and Parish Councils keen to prevent coalescence between Corsham and surrounding settlements.
- Ongoing relationship between Plan and emerging Corsham Area Framework (Masterplan) and emerging Corsham Neighbourhood Plan to be maintained – opportunities for neighbourhood plan to identify further development sites.

4.46. Site specific issues:

- Corsham Town Council support refined options, with the exception of refined option 4 (SHLAA site 1101).
- Representations provide further information on sites 493 and 479/3149.
- Awaiting results of appeals at site 1101 (refined option 4) and site 3307. Decision also pending on a planning application at site 2081 (refined option 2).
- No new sites identified in consultation.

4.47. Next steps:

- Reassess remaining housing requirement for Corsham (through the Housing Land Supply Statement 2015) to assess the degree to which recent decisions have now addressed indicative housing supply needs in the town. In addition, it would be useful to assess pending appeals in the town.
- Update map and supporting documentation with permitted/completed sites.

- Confirm reasoning as to why all site options within this area will contribute to housing at Corsham town rather than CA remainder.
- Confirm position on MSAs.
- Consider response to the issue of coalescence (or area-specific amendments to methodology).
- Continue liaison with emerging Corsham Area Framework (Masterplan) and Neighbourhood Plan work – meet with both groups to discuss methodology in further detail, next steps and implications for their work.
- Review all sites in light of the site specific comments made above in particular
 - Reassess site 493 in light of new information.
 - Reassess site 479/3149 in light of new information.

Melksham and Bowerhill

Town and parish council comments	
Melksham Without Parish Council (ID 97)	<ul style="list-style-type: none"> • Clarification sought on why Melksham's housing requirement figure (611) is higher than other areas such as Devizes and Bradford on Avon. • Support allocations in Large Villages. • Query as to why Berryfield boundary was removed in Settlement Boundary Review and not considered as a Large Village. • Consider that methodology/policy should include prevention of coalescence with adjacent settlements. • Parish Council do not support either refined option 1 or 2. • Parish Council would prefer an option 3 (including sites 648, 265 and 3103). • Parish Council also support sites 3105a and 3105b in association with the Melksham Link canal development proposal. • The Council believes there is scope for additional land for housing north of the A3102 but not beyond New Road (east of Site 3103, West of New Road) up to the new roundabout feeding the new Eastern Distributor Road. • The Council is concerned about the lack of industrial sites, and would like to stress that land adjacent to the Bowerhill Industrial Estate should be secured for further Industrial use (the land to the east of Site 699 up to the A350 should be prevented from becoming an allocated housing site).
Melksham Town Council (ID 123)	<ul style="list-style-type: none"> • Clarification sought on Melksham's housing requirement and application of site selection methodology. • Query accessibility thresholds used in methodology. • Consider that infrastructure matters should be taken into further consideration. • Town Council prefer option 2.
Developer and landowner comments and interest	
Robert Hitchens / Pegasus (ID 115)	<ul style="list-style-type: none"> • Location of a site in respect of its 'host' settlement and position in hierarchy should be more prevalent in methodology. • Promoting site 1027 (Land rear of Savernake Avenue, Melksham) – request further consideration/justification for the exclusion of this site.
Simul Consultants / Adrian Turner (ID 185)	<ul style="list-style-type: none"> • Separation of sites into options in Melksham is not helpful as some sites from each option could form a new option. • Melksham and Bowerhill are almost combined and so land between can be developed. • Promoting sites 1034 and 3219 (Woolmore Manor) – unclear why sites excluded.
RPS / Mctaggart & Mickel (ID 186)	<ul style="list-style-type: none"> • Promoting sites 267 and 266 (included in refined option 2) – note opportunity to deliver new primary education. • Do not support refined option 1 as development south west of Melksham is not well related to existing facilities and will have significant impact on River Avon.
Strutt & Parker (ID 189)	<ul style="list-style-type: none"> • Promoting site 648 (included in refined option 1). • Note that Parish Council does not consider Berryfield to be a Small Village.

	<ul style="list-style-type: none"> Do not support refined option 2 – open landscape between Melksham and Bowerhill.
Land & Water Estates (ID 234)	<ul style="list-style-type: none"> Support housing to deliver the Melksham link canal project. Support two areas proposed by the Wilts & Berks Canal Trust landscape plan (MCL landscape extract H3 & H4).
Pegasus Planning (ID 323)	<ul style="list-style-type: none"> Promoting site 3249 (included in refined option 2).
Pegasus Planning (ID 330)	<ul style="list-style-type: none"> Promoting site 3243 (land north of Melksham) – seeking clarity on assessment as no evidence to justify exclusion of site. Area of site not affected by constraints should be taken forward.
Hallam Land & Bloor Homes / Savills (ID 339)	<ul style="list-style-type: none"> No legitimate planning reason for grouping sites at Melksham into two options. Seeking further clarity on accessibility assessment. Promotion of site 265 (land east of Melksham) (included in refined option 2) – detailed site assessment, SA and site plan attached to representation. Representation provides site assessment of areas within option 2. Concern that MSA criteria not applied consistently – some sites not excluded. Raise doubts over short term deliverability of canal project linked to option 1, which is more appropriate for longer term neighbourhood plan or Core Strategy review.
BDW Trading (ID 370)	<ul style="list-style-type: none"> Object to refined options presented. Promotion of land east of Beanacre Road – plan attached to representation [new site – not in SHLAA].
Gladman Developments (ID 397)	<ul style="list-style-type: none"> Promotion of Shurnhold Farm, Melksham (site 3310) – plan and further detail on site attached to representation. Outline planning application submitted but not yet determined.
Statutory consultees and other comments	
Wilts & Berks Canal Trust (ID 155)	<ul style="list-style-type: none"> Community benefits of a proposal should be considered in the methodology. Support refined option 1 in part. Suggest two further areas should be added to the Melksham Link canal proposals in place of site 648.
Campaign for Better Transport (ID 198)	<ul style="list-style-type: none"> Object to options at Melksham due to the distance of sites from the railway station. Query whether sites 265, 267, 268 and 1025 are selected so that they can contribute to an eastern bypass.
Environment Agency (ID 274)	<ul style="list-style-type: none"> Comment on Melksham and Bowerhill: ‘Some concerns with the proposed employment areas because of encroachment into the flood zones, in particular around Shurnhold. Some of the areas shown will be within the functional floodplain (Flood Zone 3b), and not therefore appropriate for built development (less, more or highly vulnerable flood risk vulnerability) as set out in NPPF. We recommend these areas be amended to reflect the guidance set out in NPPF’.

Table 4.9 – Summary of comments and key issues for Melksham and Bowerhill

4.48. General issues:

- Melksham Without Parish Council keen to prevent coalescence between Melksham and surrounding settlements – e.g. Bowerhill.
- Discussion of Berryfield's position in hierarchy (identified as a Small Village in WCS so no settlement boundary).
- Further clarity sought on application of site selection methodology, particularly accessibility criteria and MSAs.
- Consider safeguarding potential employment land from housing development.
- Impacts of new housing on infrastructure needs, including education provision and transport.
- Melksham Link canal project discussed.

4.49. Site-specific issues:

- Concern that sites should be considered separately for reasons of commerciality, rather than in the two refined options as presented.
- Melksham Town Council support refined option 2, whilst Melksham Without support neither option and would prefer a mix of the sites currently presented in options 1 and 2.
- Developer representations requesting justification for exclusion of sites (including sites 1027, 1034, 3219, 3243) and application of methodology.
- Deliverability of sites in option 1 questioned.
- One new site identified in consultation - land east of Beanacre Road (plan attached in representation).
- Environment Agency raises concerns about flood risk.
- Awaiting decision on a planning application at Shurnhold Farm (site 3310).

4.50. Next steps:

- Reassess remaining housing requirement for Melksham (Housing Land Supply Statement 2015) with respect to any recent planning permissions (including decision pending on Shurnhold Farm application).

- Confirm reasoning why all site options within this area will contribute to housing at Melksham town rather than CA remainder.
- Confirm position on MSAs and check application of this criterion is consistent.
- Consider response to the issue of coalescence (or area-specific amendments to methodology).
- Review all sites in light of the comments made above.
- Assess new site at land east of Beanacre Road – add to SHLAA.
- Present justification for grouping sites / reassess options as shown in consultation.
- Further assessment of Melksham Link canal project particularly regards timescale and deliverability.
- Liaison with Melksham neighbourhood planning group should be undertaken to help assess their aspirations for delivering housing sites.

Cricklade

Town and parish council comments	
Cricklade Parish Council Comments	<ul style="list-style-type: none"> • Supports allocations in Large Villages and wider Royal Wootton Bassett CA. • We note that a late proposal has been put forward that would treat Cricklade separately from the Remainder because of its status as a Local Service Centre. This proposal, if activated, would probably negate the need for a site identification process for the Large Villages. • Methodology - Should take into account local factors/ circumstances and the views of local communities and obstructions noted on sites should not be used to lower the score of a site - these obstructions could be moved. Site 3088 does not have obstructions and should be re-scored/ reconsidered. • Not aware of any sites inside or adjacent to the settlement boundary that are not already registered under the SHLAA process or inside a flood zone.
Developer and landowner comments and interest	
Turley Associates	<ul style="list-style-type: none"> • Do not support the non-inclusion of site 3088 or the retention of sites 3191, 3146, 701, 2085, 461, 804 and 3315 (unsuitable). • In respect to site 3088, consultee challenges the scoring for the site. Discusses accessibility scoring and suggests that no over ground or underground pipe obstructions exist on the site. Believe that site 3088 should be added back in. • Challenges the suitability of the Culverhay regeneration project.
Persimmon Homes	<ul style="list-style-type: none"> • Supports allocations in Large Villages. • Should consider land to the north west of Cricklade (see rep for map) • Greater transparency on option/site scoring and SA/SEA findings.
Gladman	<ul style="list-style-type: none"> • Cricklade Road, Cricklade (see rep), 6 hectares, 125 dwellings - southern boundary of the town. Within walking distance to shops, schools and services. Site is available immediately.
Statutory consultees and other comments	
Statutory Consultees/ General public	None

Table 4.10 – Summary of comments and key issues for Cricklade

4.51. General issues:

- Support for allocations in Large Villages.
- The methodology should take into account local factors, strength of support and local knowledge and shouldn't score against whether a site has obstructions within it or not.

- Greater transparency on option and site scoring and SA/SEA findings.

4.52. Site-specific issues:

- Site 3088 should be reconsidered as there are no obstructions on site or underground.
- Site 3315 – Culverhay is seen as being unsuitable for inclusion (Turley Associates).
- Should consider land to the north west of Cricklade (see Persimmon rep).
- Should consider land at Cricklade Road (see Gladman rep).

4.53. Next steps:

- Revisit the initial options and continue with detailed appraisal work and determining deliverability.
- Confirm approach to housing requirement and projected windfall allowances.
- Consider the approach to Large Villages to determine the level of growth that can be delivered through the wider community area remainder/HMA.
- Consider whether to allocate PDL sites.
- Continue discussions with the Parish Council around sites they support and oppose.
- Analyse the updated SHLAA list and amend methodology if required to determine if there are any additional suitable options in the Local Service Centre.
- Reconsider site 3088 as there are no obstructions on site.
- Assess additional sites – land to the north west of Cricklade; and land at Cricklade road.

East Housing Market Area (HMA)

Marlborough

Town and parish council comments	
Marlborough Town Council Comments	<ul style="list-style-type: none"> • 378 - site (Granham Hill) already granted planning permission for retirement flats. • 380 - site partly on a flood plain. • 568 - site already in development (Care Home at former WC depot). • 569 - site identified for possible reinstatement of rail station. • 3326 - site within parish of Preshute (though will impact Marlborough parish). • Sites not included on the map were: Old Yard, Rabley Wood and Elcot Lane. It was important too that policies CP1 (settlement strategy, in particular aspects relating to market towns) and CP43 (sustainable construction relating to a mixed balance of housing) of the Wiltshire Core Strategy were upheld. Also that the comments from the Neighbourhood Plan group were also passed as part of this feedback.
Marlborough Neighbourhood Planning Steering group comments	
	<ul style="list-style-type: none"> • 380 – Stonebridge Lane is in the floodplain. • 569 – Could conflict with the restored station. • 3326 – The need for 1st time buyer/affordable housing goes beyond those included in the Crown Estate proposal and the 40-80 remaining “must have” houses. We must address this now. • Only need for 83 houses, there is 5.6 years supply and there will be windfall sites. • Proposed Brownfield allocations are fine. • Proposed option 2 site is outside of settlement boundary and is AONB • Proposed Greenfield ‘option 2’ site will be visible from key footpaths and large parts of AONB, will compromise landscape setting of the town. • No need for any large allocation in plan period. • The plan makes it too easy for sporadic development to take place in the interim period. • Re: North and Barton Park development – the National Planning Policy Framework will “tramp” AONB, CPRE and all. • Salisbury Road site should be restricted to below 150m contour.
Developer and landowner comments and interest	
Marlborough College	<ul style="list-style-type: none"> • The proposed draft methodology for identifying housing site options should also have particular regard to the ability of sites to deliver community infrastructure and other benefits. • Support for site 3326. The College Fields site has potential for a sustainable mixed use development including a new site for Preshute Primary School and the delivery of market and affordable housing.
Impact Planning Services Ltd	<ul style="list-style-type: none"> • Little, if any acknowledgement of the housing needs of the ageing population has been reflected within the site selection process. There is an important and growing need for specialist housing for

	<p>the "active elderly", those requiring low levels of support and those requiring higher levels say through extra care provision. These needs will compete for sites with those providing conventional housing.</p> <ul style="list-style-type: none"> • Greater thought should be given to this matter particularly in the case of the rural areas where older people will wish to remain within their local communities (for mutual/ family support) whilst at the same time releasing their larger family homes back into the supply chain. This all helps to sustain the viability of rural communities and assist with social cohesion including community support. Subject to the above concerns regarding the need to adopt a flexible approach, support is provided for the identification of the site at Marlborough (Rawlingswell no. 380).
ASM Porter	<ul style="list-style-type: none"> • The Option 1 brownfield sites provide more than enough capacity to accommodate the residual need, with any shortfall due to unforeseen circumstances being addressed through windfall sites. • Objects to option 2 as it is on a greenfield site in a highly sensitive landscape.
The Crown Estate	<ul style="list-style-type: none"> • The Council's approach to rejecting The Crown Estate's land at Elcot Lane (SHLAA Site 660) in favour of Site 3326 is not adequately justified, scoring is required. SHLAA Site 660 was previously tested in Wiltshire Council's Core Strategic evidence base and considered deliverable, with minimal impacts on the North Wessex Downs Area of Outstanding Natural Beauty (AONB) • No detailed information is available on how the scores have been arrived at. In addition, the 'accessibility criteria' used to appraise the respective site options are considered entirely arbitrary. In reviewing the accessibility and sustainability of the two sites we see no reason why Elcot Lane performs any worse than Site 3326. • In determining the best location for future growth and development at Marlborough, accessibility criteria should also not be the primary factor. A range of other factors need to be considered.
Statutory consultees and other comments	
Natural England	<ul style="list-style-type: none"> • Two sites appear to be in the old railway line embankment. It would appear that these sites have exceptionally high landscape sensitivity, and thus development on them would be highly inappropriate.
DIO	<ul style="list-style-type: none"> • Sites located within the Green Belt, AONB or within Mineral Safeguarding Areas should only be discounted as an option once it has been established that alternative sites outside of these designations are available and deliverable, and once assured that the housing requirement for Wiltshire could be met in full.
General public	<ul style="list-style-type: none"> • Morris Road/College Fields, Marlborough: the site is outside of the town boundary, physical constraints of the site will mean extensive excavation and landscaping to limit impact on the AONB, no access to site currently and would incur costs. Compensatory arrangements would be costly. • Landscape and access important at initial sieving exercise. Support refined option 1, Marlborough. • Objection to refined Option 2, Marlborough, due to too large a site, effect on town and skyline and setting of AONB.

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Table 4.11 – Summary of comments and key issues for Marlborough

4.54. General issues:

- The proposed methodology for assessing potential options should have regard to the ability of sites to deliver community infrastructure and other benefits.
- The housing needs of an ageing population should also be considered through the methodology and should inform the site selection process. Housing need for the 'active elderly' should be considered as well as those requiring more care.
- Sites within Green Belt, AONB or MSA should only be discounted once it has been established that there are suitable and deliverable sites available outside of these designations.

4.55. Site-specific issues:

- The 'Option 1' sites favoured as they use brownfield land, 'Option 2' essentially involves the inappropriate use of greenfield land in a highly sensitive landscape (AONB).
- Concern at the level of retirement properties being developed in the town. Site 378 already granted planning permission for retirement flats. 568 in development for a care home.
- Site 380 partly on a floodplain whilst supported by a developer.
- Site 569 identified for possible rail station reinstatement.
- Site 3326 – providing too many houses and not enough 1st time buyer/affordable housing. Site is also outside of the current settlement boundary and within the AONB, high visual impact and landscape setting compromised. Access issues.
- Equally, support for site 3326 was expressed by the College to provide a sustainable mixed use development – market and affordable housing and a primary school.
- Proposed brownfield options are fine and there is acceptance that windfall sites will come forward.
- Those sites on the old railway line embankment would be highly inappropriate due to the exceptionally high landscape sensitivity.

- Reconsider the merits/ suitability of site 660.

4.56. Next steps:

- Revisit the initial options and continue with detailed appraisal work on a range of factors, including site deliverability.
- Reconsider the potential of site 660 in the light of the evidence presented through the consultation.
- Confirm the approach to meeting indicative housing requirements in the town and role of windfall sites. Consider if other local towns and the wider community area remainder/HMA can deliver some of the housing requirement for Marlborough.
- Initiate discussions with education over site 3326 at College Fields whilst looking specifically at landscape impact and mitigation and access solutions.
- Analyse the updated SHLAA list and update methodology if required to determine if there are any additional suitable options in the town.

Tidworth and Ludgershall

Town and parish council comments	
	None
Developer and landowner comments and interest	
Landowner - Defence Infrastructure Organisation	<ul style="list-style-type: none"> • DIO - the suggested approach to identifying potential areas of search would appear consistent with the Wiltshire Core Strategy. • DIO - Supports approach to identifying areas of search. • DIO - contention that the Council should provide allocations to ensure there is sufficient land to allow for the delivery of at least 42,000 new homes across Wiltshire. • DIO - supports allocations in Large Villages • DIO - site options should not be discounted where the remaining housing requirement is for less than 50 dwellings. • DIO - suggested that in the first instance land located within the Green Belt, AONB or within MSAs should only be discounted as an option once it has been established that alternative sites outside of these designations are available and deliverable, and once assured that the housing requirement for Wiltshire could be met in full. For example, where brownfield sites exist in land designated as Green Belt they should not automatically be discounted but should remain under consideration until such times as it has been explored that the housing requirements can be met in full utilising alternative options, at which point such sites can then be discounted. • DIO - suggested that this discretionary criteria is rather limited and perhaps should be expanded in context e.g. accessibility score, this does not include reference to accessibility to public transport, walking distances, etc. • Defence Infrastructure Organisation support the following redundant MoD sites 404, 406 and 2061 (Tidworth); and site numbers 2063 2066 and 2067 (Ludgershall). It is envisaged that these sites have no future military use. • DIO support the possible future allocation of site number 553 in Ludgershall given that this site would have potential to unlock the development potential of other MoD sites in this locality. • Sites that are no longer promoted for residential development and will remain in operational use by the MoD - sites 3036, 3037 and 3039 in Tidworth. • Ludgershall - CP2 identified the MSA depot at Drummond Park as a strategic allocation. It is on the open market and the MoD is interested in the site for military uses, if it is purchased it is unlikely to come forward for housing (the site is allocated for 475 dwellings). The following MoD sites should be considered for housing in Ludgershall and Perham Down: 3, 4, 12, part of 13 and 14 in the Army Rebasing Salisbury Plain Masterplan.
Fowler Architecture & Planning Ltd - landowner	<ul style="list-style-type: none"> • The Council should not impose a ceiling or maximum figure to plan for in each area. Disagree with not looking for sites in areas of search requiring less than 50 dwellings for the plan period. Sites should include SHLAA, non SHLAA and pending planning application decisions. Areas where a NP is at examination should still be considered. Additional weight shouldn't be attached to the use of PDL and Agricultural land value should be considered further. Clarity on the accessibility data is required. Concern that sites haven't been refined in a consistent manner. • Supports SHLAA Site 553 - be revised to omit Granby Gardens as

	<p>that element is coming forward separately as an existing commitment (E/2013/0234/OUT - 109 dwellings with an extension to Empress Way, car parking, public open space and associated landscaping).</p> <ul style="list-style-type: none"> • Objects to Sites 2063 and 2066 as their development would imply growth in a south westerly direction, resulting in a harmful coalescence between the settlements of Ludgershall and Tidworth. Both options are poorly related to Ludgershall Town Centre and immediate surroundings which contain the majority of local services and facilities which would support any resident population. • Objects to site 2067 as this is not well-related to the existing settlement and would extend built form beyond the defensible boundary of the A342; is within the setting of the North Wessex Downs AONB and would be highly prominent in the landscape; is within the setting of Ludgershall Castle; and would place additional vehicle movements on the A342 around Castle Street.
Statutory consultees and other comments	
Cllr Mark Connolly	<ul style="list-style-type: none"> • Concern over housing numbers for Tidworth – DIO couldn't find sites in Tidworth and had to look in Ludgershall. The only site for housing would be Perham Down but that is not a sustainable location.

Table 4.11 – Summary of comments and key issues for Tidworth and Ludgershall

4.57. General issues:

- General support for allocations in Large Villages.
- Site options should not be discounted where the remaining housing requirement for an area is for less than 50 dwellings.

4.58. Site-specific issues:

- Sites that are no longer promoted for residential development and will remain in operational use by the MoD - sites 3036, 3037 and 3039 in Tidworth.
- No new sites identified through the consultation.
- SHLAA Site 553 – should be revised to omit Granby Gardens as that element is coming forward separately as an existing commitment.

4.59. Next steps:

- Revisit the initial options and continue with detailed appraisal work and determining deliverability.

- Review all sites in light of the site specific comments made above in particular:
 - Removal of sites 3036, 3037 and 3039 in Tidworth
 - Revised site 553 to omit Granby Gardens as that element is coming forward separately as an existing commitment.

- Assess new sites put forward including:
 - Ludgershall and Perham Down for allocation; including sites 3, 4, 12, part of 13 that is not within the proposed Service Family Accommodation (SFA) site as set out in the Army Rebasing Salisbury Plain Masterplan, and 14. (see plans in reps).

Market Lavington

Town and parish council comments	
Market Lavington Parish Council Comments	<ul style="list-style-type: none"> • Supports allocations in Large Villages. • Amenity value should be considered as a discretionary criterion. • Local support should be considered as a discretionary criterion. • Objects to sites 529 (poor access using road through the village – which is at capacity, existing paddocks and allotments, strength of local opinion), 530, 2055, (poor access using road through the village – which is at capacity), 623 (site has no access) and 374 (poor access). Support sites 619 (access would require improvement), 3268 (minimum traffic impact, but subject to flooding), 712 (access would require improvement, partly located on a flood plain), 1089 (housing or for commercial use) and 1061 (appropriate small development in isolation). • Additional development land could be identified to the south east of 3268 and 712 could be used to also provide additional village parking.
Market Lavington Neighbourhood Planning Steering group comments	
	<ul style="list-style-type: none"> • The following principles should be applied to sites in the Market Lavington Neighbourhood Plan: <ul style="list-style-type: none"> - A traffic management scheme should be produced prior to any development occurring. - Large developments of 40-50 dwellings are not suitable for Market Lavington. - Employment land is required potentially on 1089, Southcliffe and land on the Broadway.
Developer and landowner comments and interest	
Richard Cosker	<ul style="list-style-type: none"> • Market Lavington should take a high proportion of growth than in the wider community area as it is a more sustainable settlement. • More clarity required on how options are presented. • SHLAA 1089, Market Lavington. Pre-application on site and no issues have been raised except out of settlement boundary. Site is suitable and capable of providing an appropriate form and scale of residential development. • Additional site to consider: The site to the east of Lavington School (SHLAA Site 3443), which has only recently come forward also represents a far more suitable site of expanding Market Lavington as part of a disbursed growth policy.
Persimmon Homes	<ul style="list-style-type: none"> • Supports allocations in Large Villages. • Agree with Market Lavington refined option 1 (SHLAA ref. 2055 and 530). • Greater transparency on option/site scoring and SA/SEA findings.
Statutory consultees and other comments	
Statutory Consultees/ General public	None

Table 4.12 – Summary of comments and key issues for Market Lavington

4.60. General issues:

- General support for allocations in Large Villages.
- Amenity value and level of local support should be considered as discretionary criteria.
- A traffic management scheme should be produced for the village.
- Large developments of 40-50 dwellings are not appropriate for Market Lavington.
- Market Lavington should take a higher proportion of growth than in the wider community area.
- Greater transparency on option/site scoring and SA findings.

4.61. Site-specific issues:

- Objections to site 529, 530 and 2055 (essentially the wrong side of the village – traffic issues through the village), 623 (no access) and 374 (poor access) from Market Lavington Parish Council.
- Support for site 619, 3268, 712, 1089 and 1061 and additional land identified to the south east of 3268 from Market Lavington Parish Council.
- Neighbourhood Plan Steering Group commented that site 1089, Southcliffe and Broadway lands could be used for employment.
- Developer support for site 1089 – pre application discussions revealed no issues only outside of the settlement boundary. Proposed additional site 3443 – recently submitted to the east of Lavington school.
- Developer support for sites 2055 and 530.

4.62. Next steps:

- Revisit the initial options and continue with detailed appraisal work such as determining site deliverability.
- Assess the transport implications of proceeding with sites to the east of the village.

- Confirm approach to housing requirement and windfall sites. Consider the approach to Large Villages to determine the level of growth that can be delivered through the wider community area remainder/HMA.
- Continue discussions with the Parish Council and Neighbourhood Plan steering group around sites supported and opposed.
- Analyse the updated SHLAA list and update methodology if required to determine if there are any additional suitable options in the local service centre.
- Assess additional sites – land to the south east of 3268 and 712, look again at site 1089 and look at site 3443.

South Housing Market Area (HMA)

Salisbury and Wilton

- 4.63. The land use planning strategy for Salisbury was originally set out in the adopted South Wiltshire Core Strategy and has been carried forward into the adopted WCS. The strategy is partially based on the ambitious programme for delivering the Salisbury Vision. Ongoing monitoring of the WCS strategic allocations has revealed that there is a growing risk that some sites may fail to deliver housing/employment at a rate originally envisaged.
- 4.64. This could undermine the Council's five year housing land supply position, making it difficult to refuse proposals for opportunistic, speculative developments in unwanted locations. A piecemeal pattern of development would undermine the delivery of the Salisbury Vision, which is predicated on a coherent managed delivery. As such, it is necessary to explore the opportunities to take pro-active steps to unlock delivery of strategic sites and address the supply of housing before any shortfalls occur.
- 4.65. The required housing figure for the area has been calculated as 625. This figure is the projected number of homes needed to maintain a 5 year supply. It was calculated by looking at supply as projected in the adopted Housing Trajectory and comparing with actual completions. It is also based on being realistic as to the delivery of several sites. The 625 figure is the calculated shortfall.

Town and parish council comments	
Salisbury City Council	<ul style="list-style-type: none"> • SAL3 - supports this area for development subject to suitable traffic and flood assessments being undertaken. • S61 -This area needs to be conditioned to maintain the Salisbury skyline. • S243- supports development in this area subject to acceptable transport assessments being undertaken. • S1028- unable to comment without a full transport impact study, would only consider supporting development in this area providing all rights of way are respected and maintained. • S1032- no objection to development in this area subject to a suitable alternative being identified as a replacement bus depot. • Objects to SAL1 due to over development of the area • Strongly objects to SAL2 due to flooding issues. • Salisbury City Council objects to sites SAL1, SAL2, S80, S93, S159 and S237
Developer and landowner comments and interest	
Tony Crowles (landowner)	<ul style="list-style-type: none"> • Supports site 3136. • A planning application has just been submitted (28.03.15) for 4 houses on Site 3136 as the neighbouring strategic Longhedge allocation (c 450 houses etc) is in the pre-commencement stage with 'full lawful implementation of the extant planning permission' expected in the Spring / Summer of 2015.

The Longford Estate	<ul style="list-style-type: none"> • Smaller sites within the target areas can usefully contribute towards ensuring an adequate housing land supply in the short to medium term. • The definition of Wilton should be taken to include smaller neighbouring satellite villages which comprise part of the wider local community given historically they have provided housing in conjunction with Wilton. Here we refer to villages such as Bulbridge which function as part of the Wilton settlement. • General landscape impact. • Consideration should be given to enabling development that unlocks other land for development with community benefit.
Local Land agent	<ul style="list-style-type: none"> • Objects to approach to identifying areas of search. • Supports an approach to allocate in Large Villages and this process should not be left to Neighbourhood Plans. • Refinement of the options should take account of the sustainability of development at and in excess of the housing requirement. • Brownfield sites identified should not be relied upon as they could be undeliverable in the short term.
Persimmon Homes	<ul style="list-style-type: none"> • Land at Old Sarum, Salisbury- Site S80. • Objects to 50 dwelling threshold. • Methodology unduly rigid, should be meeting the full objectively assessed housing need not just the CS requirement.
Statutory consultees and other comments	
Salisbury Conservation Advisory Panel	<p>Object to Site SAL2 for following reasons:</p> <ul style="list-style-type: none"> • Totally inappropriate area for housing development. • Site is important within the Green River Valley Conservation Area. • Site creates the setting to the Conservation Area.
General Public	<p>197 people objected to development at SAL2 for the following reasons:</p> <ul style="list-style-type: none"> • Flood risk • Traffic congestion • Poor access • Loss of amenity • Views from cathedral/iconic views • Loss of green space • Impact on wildlife • Drainage issues • Loss of meadows/views • Impact on gateway to city/effect on tourism.

Table 4.13 – Summary of comments and key issues in Salisbury and Wilton

4.66. General issues:

- Salisbury City Council objects to sites SAL1, SAL2, S80, S93, S159 and S237.

- The majority of objections to SAL2 raise the issue associated with flood risk and increased traffic congestion, especially on Burford Road leading onto Downton Road.

4.67. Site-specific issues:

- Site SAL2 possible flood and traffic issues need to be evaluated and assessed in more detail.
- Site S243- traffic congestion issues need to be evaluated and assessed in more detail.
- Site S1028- unable to comment without a full transport impact study. The site would only be supported for development provided all rights of way in the area are respected and maintained.
- Site S1032- alternative bus depot site would need to be identified if the land is proposed for inclusion in the draft Plan.
- Site SAL2 - 197 people objected to development at this location for a range of environmental reasons.
- Site SAL2- development would lead to issues relating to flood risk as the site is on the water meadows. Development of the sites will give rise to traffic congestion issues on the local highway network and key junctions (e.g. Harnham Gyratory).
- Consultee preferred sites:
 - Brownfield sites at Fugglestone Red.
 - Brownfield sites Bishopdown.
 - Brownfield sites Laverstock.
 - Odstock Road – 3 consultees identified this site for further consideration.
 - Netherhampton Road/Harnham Business Park (s1028) - 3 consultees identified this site.
 - Land off Junction Road, Alderbury.

4.68. Next steps:

- Revisit the initial options and continue with detailed appraisal work such as determining deliverability.
- Consider response to issues of flood risk (if necessary re-do the sequential test) and traffic congestion.

- Review all sites identified for Salisbury and Wilton in light of the site specific comments made above with regards to SAL2.
- In common with other recommended next steps, review the original '50 dwelling' threshold and general approach to Large Villages.
- Consider whether to include PDL sites within the Plan as specific allocations.
- Consider and appraise the additional sites promoted through the consultation exercise.

Amesbury, Bulford and Durrington

Town and parish council comments	
Amesbury Town Council Comments	<ul style="list-style-type: none"> Bulford and Durrington have sites which can deliver the requirement for the area. Notes that there are no suitable sites within the Amesbury Parish boundary.
Durrington Town Council Comments	<ul style="list-style-type: none"> Amesbury, Durrington and Bulford believe that no further allocations are required. Within the context of the Council's settlement boundary review process it is noted that possible site options sit outside the current limits of development and any alteration to lines would be unacceptable.
Developer and landowner comments and interest	
Lincoln College Savills	<ul style="list-style-type: none"> Promotion of SHLAA site 3379 Amesbury (previously removed during the preparation of the South Wiltshire Core Strategy) (see representation). This was deemed to have suitable access through the South Wiltshire Core Strategy work.
Porter/ Whapshare and Benchmark Development Planning Ltd	<ul style="list-style-type: none"> The housing distribution should be more focused on the market towns in Amesbury Community Area. Supports S98, Durrington - see rep for detailed site assessment.
Westbuild Homes	<ul style="list-style-type: none"> S98 in Durrington - part of this site should be promoted with 3154.
Statutory consultees and other comments	
Environment Agency	<ul style="list-style-type: none"> Site 3077 encroaches onto critical flood zones hence demonstration of the Sequential Test and/or sequential approach will be required.
General	<ul style="list-style-type: none"> Recent developments should be taken into account. Those with lapsed planning permissions should be considered. Utilise existing local infrastructure where possible. Site 3154, Piece Meadow, should be allocated. Promotion of SHLAA Site S98 Durrington Manor, Durrington (see rep 561).

Table 4.14 – Summary of comments and key issues for Amesbury, Bulford and Durrington

4.69. General issues:

- A general view has been expressed that there are no appropriate sites in Amesbury and that Bulford and Durrington could take some growth.
- A view that no further allocations are required in the area and/or that the wider Amesbury Community Area market towns could take the growth.

- Alterations to the Settlement Boundary lines of Durrington to accommodate potential site allocations would be unacceptable.
- Recent developments in the area should be taken into account and those with lapsed planning permissions should be re-considered as potential options for new allocations.
- Existing local infrastructure should be utilised where possible.

4.70. Site-specific issues:

- Previously considered site 3379 Amesbury was promoted.
- Support for site S98 in Durrington and that this site should be promoted with 3154.
- Site 3077 encroaches into a flood zone and will require sequential test/approach.
- Support for site 3154 (Piece Meadow).

4.71. Next steps:

- Revisit the initial options and continue with detailed appraisal work such as determining deliverability.
- Review existing site allocation options and the potential need for sequential testing to address issues of flood risk.
- Re-consider those sites that were initially ruled out and whether they can be added back into the process based on any methodology alterations.

Downton

Town and parish council comments	
Downton Parish Council and Downton Neighbourhood Plan Steering Group	<ul style="list-style-type: none"> • Support the approach to areas of search but consider that the council should still identify sites in areas requiring less than 50 dwellings. • Support allocations in Large Villages. • Other factors should be used to inform the level of growth, particularly infrastructure (such as capacity of existing drainage and sewerage systems, highway access) and suitable local employment. • Support methodology – though consider that use of PDL is included. • DPD should consider all sites under consideration – note that there is a live application at Scott's House (14/07898/OUT), a site which is not included in the options for Downton. • Developing land to the west of the A338 is consistent with feedback from Downton Parish Survey carried out as part of NP process, however options 1 and 2 not entirely supported. • NP will be submitted to Wiltshire Council in June 2015, which will seek to identify sites. • Site S200a (part of option 1) is subject to a planning application (14/06561/FUL) for 99 dwellings. • Concerned that development of sites 200a and 200b (option 1) would constitute overdevelopment and exacerbate infrastructure issues (highways, drainage/sewerage and primary education). • Parish Council preference for sites S195 and S200a over site S200b. • Site S3026 (part of option 1) has planning permission for 13 dwellings which are in construction.
Developer and landowner comments and interest	
Persimmon Homes	<ul style="list-style-type: none"> • Promoting Wick Lane site S200a (part of option 1). • Live application on site – query as to whether DPD assessment has referred to evidence submitted as part of application. • Seeking greater transparency on site assessment work undertaken. • Consider that site S200b should be treated as a separate site as in different land ownership – and that S200a should be an option on its own. • Object to proposed 'option 2' - consider site 3386 is in open countryside and therefore not a sustainable location for development.
Taylor Wimpey / DC Planning	<ul style="list-style-type: none"> • Consider that methodology for identifying and scoring sites is too 'broad brush' particularly if 'options 1 and 2' score the same. • Merits of the location generally set out in documents which accompany current application at S200a. • Promoting S200b (part of option 1), and further parcel of land attached to the north of this site (see plan attached to rep). • Object to 'option 2'.
Statutory consultees and other comments	
Ian Campbell	<ul style="list-style-type: none"> • Supports approach to areas of search and allocations in Large Villages. • Special Landscape Area around Downton should be taken into account. • Local knowledge should be taken into account via the landowner, parish council and NP steering group.

	<ul style="list-style-type: none"> • Objects to site 3386 (part of option 2) as larger than required. • Note that Charlotte Close (under construction) and Scott’s House (application) not included. • Note that the landowners of the northern part of site S82 intend to submit a planning application. • Site S82 should have been considered in sections as it is in multiple ownerships. The northern section is better in terms of access and landscape impact.
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Table 4.15 – Summary of comments and key issues for Downton

4.72. General issues:

- Re-assess and confirm the indicative housing requirement for Downton, taking into account any recent permissions.
- Re-assess the timetable for delivering the Downton Neighbourhood Plan (due to be submitted end of September 2015). It is vital that the emerging Neighbourhood Plan is supported even if it will set a policy position for the village before this Plan has been submitted.

4.73. Site-specific issues:

- No decision on site S200a application (14/06561/FUL) for some time.
- Scott’s House application site (14/07898/OUT) not included in assessment.
- Also site north of S200b and Scott’s House promoted by Taylor Wimpey.
- Parish Council/ NPSG preference for sites S195 and S200a over site S200b.
- Transport and infrastructure assessment of options 1 and 2.

4.74. Next steps:

- Revisit the initial options and continue with detailed appraisal work such as determining deliverability.
- Review site assessment in the area and refer to the application documentation relating to site S200a.
- Consider splitting site S82 and assess how this will impact on the assessment process in terms of comparing the relative impacts associated with a split site.
- Two new areas of land to add to SHLAA and then assess:

- Scott's House application for 25 dwellings (14/07898/OUT) was refused 30th April 2015 – consider / address the reasons for refusal and re-assess the merits of allocating the site.
- Additional parcel of land promoted by Taylor Wimpey (ID 259) north of S200b - Scott's House.
- Discuss the application for planning permission on site S200a (14/06561/FUL) with the relevant case officer.
- Check the Charlotte Close development is included in 2014 housing completions table within the published Housing Land Supply Statement.
- Review the draft Downton NP and consider its plan preparation timing / relationship with the Plan – further input from NP steering group would be beneficial.
- Consider whether options could be amended in line with parish council preferences.

Large Villages

Town and parish council comments	
North and West HMA	
Christian Malford	<ul style="list-style-type: none"> • Emphasis should be on the neighbourhood plan process as the primary site selection mechanism.
North Bradley	<ul style="list-style-type: none"> • Supports allocations in Large Villages. • Objects to coalescence of Trowbridge and North Bradley.
Hilperton	<ul style="list-style-type: none"> • Supports allocations in Large Villages. • Objects to coalescence of Trowbridge and Hilperton.
Seend	<ul style="list-style-type: none"> • Questions how a Large Village can identify sites for affordable housing or small family homes if it's not being considered in the plan.
West Ashton	<ul style="list-style-type: none"> • Supports allocations in Large Villages. • Objects to coalescence of Trowbridge and West Ashton.
East HMA	
Bromham	<ul style="list-style-type: none"> • Supports small-scale development only, preferably PDL and closely related to the built form. • Objects to allocations in Large Villages. • Supports part of site 668 for 15 dwellings. • Supports part of site 371. • Objects to sites: <ul style="list-style-type: none"> - 670 due to agricultural status, adjacent CWS and SLA. - 669 due to agricultural status and traffic. - 517 due to agricultural status and access. - 348 due to adjacent listed building. - 1086 due to adjacent CWS, SLA, listed building and access issues. - 671 due to agricultural status and road safety issues.
Tidworth/ Ludgershall area	<ul style="list-style-type: none"> • Shared infrastructure and traffic issues between groups of villages should be taken into account. • The army rebasing project needs to be considered.
West Lavington	<ul style="list-style-type: none"> • Large Villages should be treated equally, whether or not they are producing a neighbourhood plan. • Sites not submitted to the SHLAA should be considered.
Ramsbury	<ul style="list-style-type: none"> • Supports allocations in Large Villages. • Local knowledge must be used. • Supports site 402. • Objects to all options outside of the settlement boundary due to impact on the AONB, traffic and parking issues. • Suggest the following alternative sites could be considered: <ul style="list-style-type: none"> - Land at Whites/Laurels Garage at the west end of Back Lane. - Land west of Chapel Lane before Swans Close.
Upavon	<ul style="list-style-type: none"> • Supports allocations in Large Villages.

	<ul style="list-style-type: none"> • Supports 408. • Objects to 582 and 597. • Suggest the following sites could be considered: <ul style="list-style-type: none"> - Unused Forge site, Jarvis Street. - Garage site in the village centre (planning permission has lapsed).
South HMA	
Broadchalke	<ul style="list-style-type: none"> • The Broadchalke Conservation Area Appraisal and Management Plan should be taken into account. • The valley floods to a greater extent than shown on flooding maps. • Sites should come forward via neighbourhood plans. • Supports the southern end of site 3338 and site 3306. • Objects to sites 3212 and 3213 due to impact on iconic rural vistas.
Laverstock and Ford (small village)	<ul style="list-style-type: none"> • Objects to sites 3136, S93 and S80.
Shrewton	<ul style="list-style-type: none"> • Supports site S154. • Supports S113 for use for the Wiltshire Council Care for the Elderly Project. • Supports S134 for education use. • Objects to sites S209, S5, S51, S77, S146, S150, S151, S152, S1066, S1067, S3384 and S3385.
The Winterbournes	<ul style="list-style-type: none"> • Detailed assessment of each site available in the representation.
Winterslow	<ul style="list-style-type: none"> • Support some development in Winterslow. • The DPD should support development in Large Village if there is no neighbourhood plan. • Community support should be taken into account. • Support sites identified by the neighbourhood plan process being included in the DPD. • Suggest a number of sites: <ul style="list-style-type: none"> - NW Middleton Road opposite Woodland Drive. - Red House, Middleton. - Adjacent Wynlyn, Weston Lane. - Beechwood, Middleton. - Adjacent Pandora, Tytherlet Road. - SE Weston Lane. - NW West Lane. - Off Livery Road adjacent Kings Farm. - Kings Farm, Livery Road. • A detailed assessment of each is provided in the response.

Table 4.16 – Summary of comments and key issues for large villages

Developer and landowner comments and interest

4.75. The following sites are being promoted by developers:

Sites:
448, Purton
Land at South Ravenhill Farm, Purton
Site at the rear of Wagtails, Alderbury
684, Oaksey
291, Hilperton
S77, Shrewton
Land at Station House and builders compound, Collingbourne Ducis
3113b, Ramsbury
Land at Chrucj Farm, Latton
Land off Alderbury Road, Alderbury
Land at Manor Farm, Holt
3348 and 3349, Oaksey
3303, Sutton Benger
Cotswold community site, Ashton Keynes
Land at Fralex, Middleton Road, Winterslow
Widham Farm, Purton
3207, Broad Hinton
3367, Rowde
1081, Seend
3444, Holt
290, Hilperton
100 Frome Road, Southwick
Land at Atworth Business Park, Atworth
Land south of Devizes Road, Hilperton
Land west of Common Road, Whiteparish
Westbury Road, Great Cheverell
Melksham Road, Holt
Land south and east of Brook Farm, Great Somerford
Land south of Tewkesbury Way, Lydiard Tregoze
Land at Clay Street, Whiteparish
Land adjacent Lagard House, First Lane, Whitley
The Tannery, Holt
Land adjacent to the sheep fair field, Wilton
3443 – land to the east of Lavington School
Seven representations support site 3207 in Broad Hinton including the cricket club and local pub.

Summary of stakeholder engagement workshops/ briefing sessions

Town and parish councils

4.76. As part of this consultation, the council hosted a series of town and parish council briefing sessions at each of the three Wiltshire HMAs at:

- Chippenham Town Hall (North and West HMA) on Monday 23rd February 2015
- Salisbury Guildhall (South HMA) on Thursday 26th February 2015
- Devizes Corn Exchange (East HMA) on Wednesday 4th March 2015.

4.77. These sessions were well attended by representatives of local town and parish councils who were presented with an overview of the work that had been undertaken to date. Participants also had the opportunity to discuss the initial site options identified in their areas and ask questions about the site selection methodology, scope of the consultation and other matters related to the Plan.

4.78. The questions raised through the sessions included the following (A full list of questions raised through these sessions can be viewed in Appendix B):

- How are the AONBs being taken into account in the site selection process?
- How are infrastructure matters being considered?
- What happens in areas with an emerging neighbourhood plan? Are the council going to support the preparation of these plans in terms of addressing local supply?
- Why is the housing requirement so large in the North and West HMA? How was the requirement for Trowbridge identified?
- If a town does not meet its indicative housing requirement, will it be met elsewhere in the HMA?
- Are the Core Strategy requirements a minimum figure?
- Why have some SHLAA sites been rejected?

4.79. Town and parish councils were also invited to attend 'one-to-one' sessions with spatial planning officers later in the consultation period. These sessions were offered to provide opportunities for local councillors to discuss how the Plan might potentially affect their area in further detail.

Developers and other stakeholders' workshop

4.80. In addition to the consultation targeted at town and parish councils, the council held a workshop event for developers and landowners at the Trowbridge Civic Centre on Thursday 5th March, which was well attended by more than 80

stakeholders.

- 4.81. The event began with a presentation similar to that used at the town and parish council events, but tailored to address the audience's specific interests; followed by a question and answer session; and finally a workshop exercise designed to discuss key questions posed in the consultation.
- 4.82. The workshop exercise was particularly useful in raising the council's awareness of issues and ideas likely to come up in developer responses to the consultation.
- 4.83. Maps showing the initial site options were made available to view and spatial planning officers were again on hand to help facilitate the workshop exercise and to answer any questions about the Plan.
- 4.84. A full list of questions raised by attendees, matters discussed and summaries of officer responses provided through this workshop as well as roundtable questions and answer summaries can be viewed in Appendix C.

Chapter 5 Conclusions and next steps

- 5.1. Following the successful consultation exercise, the council have reflected on the comments received and suggestions put forward for changes to the approach and methodology used to inform the process of site identification and assessment. Again grouped into the themes of the consultation, this chapter details those key areas that will require consideration moving forward.

Actions

Theme 1: The approach to identifying potential 'areas of search' (Covering questions 1, 2 and 4)

- 5.2. Options identified for further consideration:
- Maintain the current position in terms of the methodology for identifying areas of search – i.e. identify potential housing sites / options in areas of search with a requirement of more than approximately 50 dwellings for the remaining plan period up to 2026.
 - Enable sites to be identified in areas of search with a requirement of less than approximately 50 dwellings.
 - Enable sites to be identified in any area of search even if the requirement has been met.

Theme 2: The overall methodology (Covering questions 5 and 6)

- 5.3. Options identified for further consideration:
- The application of certain strategic and discretionary criterion to determine if they are applied/considered at the most appropriate stage.
 - The appropriateness and use of additional assessment criteria to determine site suitability.
 - The overall discretionary 'scoring' process of site assessment and application of accessibility criteria.
 - Whether to allocate PDL sites within existing settlement boundaries through the plan or whether to allow national and local policy to deliver this.
 - The appropriateness of grouping sites into 'options' or whether to solely present sites individually.

- Determine whether it is necessary and feasible to undertake 'local needs assessments' to feed into the methodology and assessment process.

**Theme 3: The approach to large villages
(Covering question 3)**

5.4. Options identified for developing the Plan in terms of meeting indicative housing requirements:

- Consistently identify site allocations at all Large Villages.
- Identify site allocations at some Large Villages, based on need, suitability of sites and local policy constraints.
- Amend Core Policy 2 to provide a more permissive policy approach towards sites outside of settlement boundaries.
- Develop a criteria based approach to housing development in the Community Area Reminders to address housing supply whilst maintaining a degree of control of where such development should take place by taking into account local need and policy constraints.

Appendix A: Questions asked through the housing site allocations informal consultation

Question 1:

Do you agree with the approach to identifying the potential 'Areas of Search' where new housing sites could be identified?

Question 2:

Do you agree that we do not look for sites in areas of search that require less than approximately 50 dwellings (with the exception of Market Lavington and Cricklade Local Service Centres) to be provided over the remainder of the Plan period to 2026?

Question 3:

Should the plan identify sites for growth within all, some or none of the Large Villages identified in Table 1 (of the leaflet) or if not, what mechanism should be used to identify sites in these settlements?

Question 4:

Are there any other factors that should be used to inform the identification of Areas of Search or the level of growth to be provided?

Question 5:

Do you agree with the methodology for identifying housing sites?

Question 6:

Are there any other factors that should be considered in the methodology that have not been taken into account?

Question 7:

Do you agree with the options for development? If so, please state which options and why?

Question 8:

Is there any option you don't support? If so, please state which option and why?

Question 9:

Are there any other specific sites that we should be considering and if so what are they?

General Issues:

This was an opportunity for consultees to provide any general observations/ information or discuss other issues.

Appendix B: Town and parish council consultations (stakeholder events and drop in sessions)

Full list of questions asked by attendees through the town and parish stakeholder event sessions

North and West HMA – Chippenham Event (23rd February 2015)

- How are rural communities being supported in terms of housing supply?
- Should more consideration be given to wind-fall housing and business expansion / job creation in rural areas?
- How is an AONB taken into account in the methodology? Are the Council treating AONBs with enough rigour to meet the requirements of national policy?
- Is consideration being given to how the various timetables for delivering neighbourhood plans and that of the Housing Site Allocations Plan in terms of how housing sites are being allocated? For instance, what happens if a neighbourhood plan is seeking to allocate housing sites? Will the Council support these proposals and allow the neighbourhood plans in question to 'do the job' in terms of delivering supply, or will the Housing Site Allocations DPD overtake events?
- If a site is allocated does the settlement boundary then get re-drawn around the site?
- Does the Council prefer sites to be developed inside the current development boundary ("Limits of Development")?
- Will the proposed Kemble Airfield development count towards Wiltshire's/South Gloucestershire's and Cotswold District Council's housing supply quanta.
- When will specific infrastructure requirements be brought forward to ensure they address the pressures exerted by increased levels of development?
- How was the Trowbridge indicative housing requirement allotted?
- Why and how have certain SHLAA sites been assessed and ultimately rejected? – i.e. what was the specific justification?
- Will local communities be better able to defend themselves against speculative developments once settlement boundaries ("Limits of Development") are revised?
- If a town doesn't meet its requirement will it be met elsewhere in the HMA?
- Should the indicative housing distribution across Wiltshire be re-allocated between HMAs?
- Why is the requirement so large in the North and West Wiltshire HMA?

South HMA – Salisbury Event (26th February 2015)

- Will all SHLAA sites in large villages be delivered and what form does “infill” in small villages take? Will “infill” in small villages count towards the housing requirement?
- To have no growth in our small villages is disappointing, are small villages thus seen as being unsustainable locations?
- Perhaps Wiltshire should consider a new town in an appropriate location that can deliver upwards of the 5000 homes required.
- Is consideration being given to the relationship between the neighbourhood planning process and the Housing Site Allocations DPD in terms of how the indicative housing numbers are to be delivered? How will the respective timelines for these plans be resolved in terms of the responsibility for delivering housing – e.g. how will conflicts be resolved?
- If a new site is put into the SHLAA, will the Council alert/ advise the local Parish Council of the availability of such land?
- Looking at the SHLAA site in Tisbury, this is located in the flood zone. What were the criteria for selecting/ appraising sites; and what assessment work will be undertaken moving forward to justify certain sites for inclusion in the draft Plan?
- When will there be another round of public consultation on the settlement boundary review?
- Does rural housing contribute towards the overall housing figures?
- With regard to Broadchalke (site 3212) – the Council should be aware that the land in the area is prone to flooding; and is an identified ‘iconic vista’ in the Broadchalke Conservation Area Management Plan.
- Site 3213 is a site of special historic interest (Saxon Burial Ground) – has this been considered?

East HMA – Devizes Event (4th March 2015)

- Concern was expressed with the number of retirement complexes currently being delivered in the Marlborough area. These are expensive to buy and don't meet the housing need in the area. The Core Strategy doesn't protect against this form of development, what protection exists?
- Do these retirement complexes count towards the residual housing requirement?
- The two sites that have been listed as 'options' in Marlborough have applications on them for retirement complexes.
- Are the housing requirement numbers a minimum figure or are they confirmed / set in stone?

Bromham

- The parish won't be doing a Neighbourhood Plan. However, large areas of land in the village are of high quality agricultural land (market gardening) and this needs to be protected from development. Some land has been put forward by the Crown Estate and the Parish Council have been approached with a view to considering a proposal for some 15 homes on a site in the village. However, it is understood that the landowner (Crown Estates) wants to provide more than that (up to 50 dwellings). The Parish Council want to know why aren't the Council looking to deliver the required housing on a number of smaller sites rather than just bigger ones?

Tidworth/ Ludgershall and Army rebasing

- Why aren't the housing numbers associated with the army re-basing in Tidworth/ Ludgershall area being taken off the overall housing requirement for the area?
- The level of development in the area will also result in significant strain on infrastructure. The MoD isn't showing much interest in the process and isn't addressing the infrastructure issues. Will these issues be considered along with the Housing Site Allocations DPD timetable?

Market Lavington

- Generally happy that growth will be delivered at the village, but only if it is at an appropriate scale and in the right location(s).
- There are issues with the site options as currently shown from a traffic point of view. There are already traffic issues in the centre of the village.
- Consideration does not appear to have been given to: the infrastructure implications associated with new development; impacts on the local job market; and lack of employment land. These points will need to be addressed as the plan develops.

Potterne NP

- The Potterne Neighbourhood Plan is proposing to deliver 20-25 houses. Is the Council now saying that this isn't enough; or that other villages should deliver more?

Upavon

- Concerned about the type of housing in Large Villages.
- In Upavon a local housing needs survey was undertaken that showed that long travel to work times is an issue. Therefore, is it sensible to put affordable housing in rural settings that might not have a regular bus service, no access to local employment etc?
- Considering the rural nature of the Upavon area, wouldn't it make more sense to direct affordable housing towards market towns / principal settlements?

General questions

- Does the table of indicative housing numbers to be delivered over the remaining plan period take into account identified Neighbourhood Plan allocations?
- Is the housing supply paper on the website also being consulted on?
- When will the Settlement Boundaries be revised and agreed for the purposes of decision making?
- Will allocated sites be included within the updated settlement boundary lines?
- Is there a hierarchy across the Community Area remainders and between Large Villages? For instance, if growth is delivered and the indicative numbers are met within the villages that have delivered a Neighbourhood Plan, will other villages without such Plans still be required to deliver housing? If not, will these villages subsequently drop out of the process and be allowed to become unsustainable?
- If a village hasn't started a Neighbourhood Plan are they too late to influence the Housing Site Allocations DPD?
- The consultation materials mention the need to work in harmony with emerging Neighbourhood Plans. What happens if harmony cannot be achieved? Who takes priority over which sites are chosen and the decisions made? How is conflict (in policy terms) going to be addressed?
- Are you aware of any small villages that are undertaking Neighbourhood Plans?

Town and Parish Councils Individual stakeholder sessions

Following the initial workshops, the Council hosted two days of further drop-in sessions for parish and town councils to sign up to.

These were run to allow for a more detailed discussion with officers regarding any specific concerns that the town/parish council had regarding potential development in their own area.

The following town/ parish councils attended one of these sessions:

Organisation	Date
Downton Parish Council	Wednesday 25 th March 2015
Fovant Parish Council	Wednesday 25 th March 2015
Winterbourne Parish Council	Wednesday 25 th March 2015
Winterslow Parish Council	Wednesday 25 th March 2015
Laverstock and Ford Parish Council	Wednesday 25 th March 2015
Holt Parish Council	Thursday 26 th March 2015
Cricklade PC	Thursday 26 th March 2015
Corsham Town Council	Thursday 26 th March 2015
Warminster Town Council	Thursday 26 th March 2015
North Bradley Parish Council	Thursday 26 th March 2015
Bromham Parish Council	Thursday 26 th March 2015
Melksham Without Parish Council	Thursday 26 th March 2015
Hilperton Parish Council	Thursday 26 th March 2015 (did not attend)
Colerne Parish Council	Thursday 26 th March 2015 (did not attend)
Westbury Town Council	Thursday 26 th March 2015 (did not attend)

Appendix C: Developer workshop

Full list of questions and points raised through the Developer workshop held on 5th March 2015

As part of the developer workshop held, officers provided a presentation outlining:

- The scope of the Plan;
- Methodology employed to identify potential areas of search / site options; and
- An overview of the work undertaken to date.

A brief question and answer session was then held to give attendees the opportunity to discuss any concerns or queries they may have about any aspect of the work undertaken and the consultation exercise itself.

These questions are listed below:

Q - *Mr. Woodcock resident from Tisbury – will the process be affected by the General Election in May?*

A – It is not envisaged that the General Election will have a major bearing on the scope and intent of the emerging Plan. The Plan is being prepared in direct response to a recommendation set out by the Core Strategy Inspector to provide surety of housing supply over the remaining [Core Strategy] plan period. Any changes to the make-up of central government post-Election will not alter this requirement. The Plan is premised on the need to ensure continuity of housing delivery in line with national and local policy.

Q - *Robert Gillespie, Impact Planning Services – concerned about the level of precision being applied to the ‘at least 42,000’ figures set out in the Core Strategy. The figure is not a ceiling, but the minimum of what will be achieved over the plan period; and that the process of plan making therefore needs flexibility and yet there is seemingly no slack being applied. Concerned that settlement boundaries, as currently drawn, are very limiting to growth. Settlement boundaries should not be re-drawn so tightly to the built urban form of settlements.*

A – The points made are noted and taken as a statement of fact.

Q - *David Barnes – the presentation described the process to date as being managed via the application of a ‘black box’ approach to rationalising land through the application of an ‘automated system’. Will this ‘black box’ system be opened for all to digest how land has been evaluated? How did the sieving process work in practice?*

A – The process was essentially an automated sieving process utilising Excel to ascribe scores to land affected by certain high level planning policy constraints. The ‘workings out’ are available and we will provide information as necessary. The process report we will present is a credible showcase of our findings at each stage- we will share our information in good time.

Q - *There is a significant shortage of dwellings / capacity in Trowbridge, will the Council look at other areas to help address supply in the local area. For example, is there merit in seeking to identify more land / SHLAA sites in Warminster? In other words, how will you settle the Trowbridge supply problem? Will it result in a further decant of housing numbers to other areas?*

A – We will test SHLAA capacity at Trowbridge against the overall indicative requirement. This process is ongoing and involving: transport modelling / assessments and other disciplines. We have to test the projected quanta in other areas and see whether there is an opportunity for identifying additional development sites at other settlements in the same HMA. However, the process of flexing supply requirements within HMAs will nonetheless need to examine and assess the individual geography of places as some settlements may (or may not) have opportunity to grow. Warminster has a strategic allocation and planning issues to address - e.g. flood risk. Therefore, as part of the process of testing the ability for Trowbridge to accommodate the uplift in housing numbers, consideration may need to be given to other Market Towns and local Large Villages.

Q - *Henry Oliver North Wessex Downs AONB – with regard to the proposed ‘stage 3 discretionary criteria’ and specifically - cultural heritage designations, it is assumed that you [the Council] will update the methodology to reflect other significantly important criteria such as: World Heritage Sites (and their settings); Grade I / II Listed Buildings; etc and Historic Parks and Gardens?*

A – In the main these criteria have been assessed through the application of the ‘strategic criteria’ and then the discretionary criteria. However, we will be reassessing the methodology where necessary to reflect any changes that are required in relation to the application of the sieving process.

Q - *Jonathan Jarman Bell, Cornwell Planning – concerned about the proposed ‘50 dwellings threshold’ as it appears to be based on a series of unqualified assumptions. Further consideration of this element of the methodology should be applied – e.g. a reassessment of the indicative housing numbers; windfall allowances; and a reassessment of supply scenarios in emerging neighbourhood plans. Such work should consider what happens in the scenario of emerging neighbourhood plans failing to deliver projected housing requirements?*

A - We feel confident that a combination of windfall and neighbourhood planning in certain areas will pick up the slack in terms of housing supply in those areas that require less than circa 50 dwellings over the remaining plan period. That said, we are asking the question today, as we want comments from you on whether these assumptions are indeed credible.

If there are issues with our approach, we need to know from you. In relation to windfall allowances, it is clear that the Core Strategy Inspector considered our approach to be somewhat conservative and hence we will be looking at this through the plan making process. There will inevitably be tensions around addressing the indicative housing numbers, particularly in our Community Area remainders (i.e. Large Villages). Therefore, when considering potential allocations of land we will be placing great store on the 'geography of places' in assessing the degree to which there are opportunities (or not) to bring forward allocations. The key will involve proving deliverability whilst addressing constraints. Our reasons behind not including areas where the indicative housing requirements are less than 50 dwellings will be further explored in the forthcoming workshop session.

Q - *Charlotte Watkins, LB planning - Neighbourhood Planning - how does the process of neighbourhood planning fit with the proposed methodology at Stage 1; and what if you get conflict with community groups that lead to plans allocating very little, or no, housing? In such circumstances, will developers have to go back to Stage 1 again?*

A - If a Neighbourhood Plan has reached the examination stage, our current methodology determines that we will not seek to allocate land for housing. The basis for this approach is underpinned by our desire to support neighbourhood planning. Clearly, if neighbourhood plans are not being prepared, or are taking too long to reach fruition, then there may well be a need to work with the local parish / town council to address how indicative supply requirements are met. We have asked specific questions regarding the role of neighbourhood plans in helping deliver indicative housing requirements. But ultimately, the Council may need to take a 'strategic lead' on the issue of ensuring supply in line with the requirements of national / local policy.

Q - *If a Neighbourhood Plan is submitted for examination does this mean that the Council will stop looking in this area?*

A - We are collating evidence, and we will respond accordingly. We need to see if allowing neighbourhood plans to 'do their job' will help with overall delivery in certain areas, but we need to keep an eye on this. Unfortunately, there is no black and white answer.

Q - *Roger Smith, Savills – Concerns over the proposed plan period to 2026. The NPPF encourages local authorities to prepare local plans with at least a 15 year horizon. If the timescale experience in relation to the preparation of the Wiltshire Core Strategy is applied to the Housing Sites DPD it may be that the Plan will not be adopted until 2017, hence leaving a period of only 9 years. Therefore, should the Plan be recast over a longer life span?*

A – The Housing Site Allocations DPD is being prepared to address specific recommendations emanating from the examination of the Core Strategy. As such, it is a product of the Core Strategy and hence is tied to the 2026 horizon date. Longer term plan horizons will be driven by new evidence – e.g. the new Strategic Housing Market Assessment. However, this work has not yet been commissioned and therefore cannot influence the scope of the Plan at this stage.

Following the question and answer session, the attendees were asked to consider and answer the following questions via roundtable discussions; and then feedback their responses:

Questions posed for discussion

1. In the methodology we are not looking, at this stage, in areas of search where there is an overall requirement of less than 50 dwellings, as this could be met via windfall and / or neighbourhood plans. Do you agree? If not, to what extent should the Plan be focussed on delivering absolute precision in terms of addressing indicative housing requirements?
2. Should PDL sites within existing 'settlement boundaries' be included within the Plan as specific allocations? Alternatively, should such sites be left to come forward in line with the general presumption in favour of 'brownfield first'. Either way, please provide a reasoned response.
3. In the methodology we have applied a list of 'strategic' and 'discretionary' criteria, to assist with the identification of potential site options, as overleaf. Do you agree with the approach we've followed? Is there anything missing, or should any criteria have different emphasis in the decision making process?
4. How should we approach allocating sites in the Large Villages? For example, would a criteria based approach to managing 'non-strategic' growth at these locations work in practice?
5. Within the methodology there is scope for housing numbers to move within the HMA, if required (for example: due to constraints in any location, capacity issues or development opportunities), do you have any views on whether flexibility could be applied?
6. From a market perspective, to what extent are you seeing increased pressure for the release of more housing? What factors are driving this? Please refer to specific locations.

Summary of feedback from the round table discussions

Comments and reflections on question 1

- The proposed '50 dwelling threshold' is arbitrary and lacking an evidential base – e.g. it doesn't allow for an equitable approach to be taken across Large Villages.

- Should the threshold be removed, or made even smaller, what evidence is there that villages will respond positively through neighbourhood planning to boost supply / meet indicative housing requirements?
- The draft Plan should provide security in terms of housing supply in line national / local policy? What will happen in those areas with less than a 50 dwelling requirement and no neighbourhood plan in the pipeline?
- The proposed '50 dwelling limit' aligned to a supply scenario utilising windfall is seen as a positive / appropriate approach to meeting local supply.
- The '50 dwelling threshold' figure is a realistic approach to take, but the Council is seemingly presenting an ultimatum to local parish / town councils to find sites via neighbourhood planning processes.
- The '50 dwellings threshold' approach is wrong as it limits development opportunity elsewhere. The approach is also arbitrary – why not apply a lower figure such as: 10 or 20?
- The indicative housing requirements in Community Area remainders should be appropriately planned for through a thorough assessment of the 'geography of places' and local constraints.
- Relying on windfall is a good approach to take, but only in the right place.
- The approach *could* restrict reasonable opportunities for bringing forward growth in certain locations; and as the indicative housing requirements should not be seen as a ceiling, there would appear to be merit in dropping the 50 dwelling threshold.

Comments and reflections on question 2

- PDL should be excluded from the process of identifying land for potential allocation as there is a general presumption in favour of developing such sites.
- The 'brownfield first' policy presumption is an outdated approach to considering housing supply.
- Brownfield land should be positively allocated to provide surety / certainty to landowners / developers and investors.
- Can we maintain a brownfield first approach throughout the plan area given individual site issues?
- Issues relating to the delivery of brownfield development sites should be subject to a separate policy.
- A policy-led approach to prioritising the release of PDL should consider how such sites are addressed where they are situated outside of the Settlement Boundary.

- The draft Plan should include a positive approach towards brownfield land as this will stimulate development opportunity and provide a degree of certainty.
- Brownfield sites can unlock larger sites and this needs to be given more consideration.

Comments and reflections on question 3

- Within the context of the application of the proposed 'strategic / discretionary criteria', should the protection of green space be a specific consideration in the methodology?
- In terms of the use of accessibility criteria to assess site suitability, what thresholds have been applied to walking, bus and car use to access services and facilities?
- Will SHLAA sites be removed from further consideration if say only a part of the site is excluded following the application of strategic / discretionary criteria?
- Greater clarity on the criteria used to assess potential site options is required in order to support the proposed methodology.
- Appropriate levels of development should occur within AONB's, however, the approach to identifying land to allocate should be landscape character-led. Also what happens at the edge of AONBs? Are the Council providing enough protection to the setting of such areas?
- The assessment of primary school capacity appears to be missing from the proposed 'discretionary criteria' – school capacity should be added to the assessment process.
- Distance to train stations from proposed sites / allocations in the accessibility criteria should be added.
- Community support for local proposals should be a factor that is considered – i.e. what is the local appetite for growth? Consideration should also be given to whether or not local community support should be weighted in the assessment process.
- Access / egress opportunities in relation to sites appears to be weighted higher than the opportunity to bring forward proposals on PDL, this should be reconsidered.
- The balance between housing supply and employment opportunity should be reassessed where possible.

Comments and reflections on question 4

- A criterion based approach to bringing forward development in Large Villages could work. However, care must be taken to avoid current / past issues of settlement boundaries restricting land supply.
- Each Large Village should be assessed on its own merits in terms of its potential to accommodate growth.
- If development is not brought forward at Large Villages via an allocations route, what happens to those places who aren't preparing neighbourhood plans? In such

circumstances, the Council must take a more proactive approach to meeting indicative housing requirements.

- When considering development potential at Large Villages the methodology should assess sites within and around existing settlement boundaries.
- A positive approach to allocating sites in Large Villages should be recognised as an important mechanism for bringing forward much needed affordable housing in rural communities.
- Local Housing Needs Assessment should be undertaken and used to address local supply in rural communities.
- Opportunities to positively secure self-build and flexible live/work properties in allocations should be considered to provide a mix of supply.

Comments and reflections on question 5

- The opportunity to address supply commitments through flexing within HMAs is an appropriate strategy to take, particularly where constraints in certain locations determines a need for such flexibility. However, where such an approach is taken, the Council will need to provide a reasoned justification to explain the approach taken.
- When considering the need for flexibility in addressing the indicative housing supply requirements, a sequential approach should be taken, as follows:
 - Flexibility should first be addressed within each HMA; then
 - Between and / across other HMAs.
- The indicative requirements at Trowbridge could be divided out across other areas to spread the load.

Comments and reflections on question 6

- Market pressures allied to changing demographics are exerting pressure on local housing markets leading to a distinct lack of supply in some places. This needs to be factored into the overall approach to meeting indicative supply requirements.
- Pressure exerted by 'London buyers' / second home purchasers (e.g. in rural areas) appears to be distorting the local market leading to a perceived lack of opportunity for local buyers.
- Higher value development areas (e.g. Large Villages) are more constrained. The market would support more delivery in these areas subject to constraints being addressed.
- A more dispersed approach to allocating land will benefit faster delivery as it creates competition in the local market.

- Volume house builders can exert economies of scale in order to build more cheaply and hence smaller builders simply cannot compete.
- More opportunity should be provided through the allocation of small sites to encourage mix and variety in the local housing market.
- In places such as: Marlborough, Bradford-on-Avon, Devizes, Westbury and Large Villages the Plan should seek to offer more opportunity through the allocations process in order to sustain services and local facilities.

Appendix D: Responses from the statutory consultees

1) Natural England (Mr Charles Routh) Consultee ID: 382216

Question 1:

Do you agree with the approach to identifying the potential 'Areas of Search' where new housing sites could be identified?

Answer: No comment.

Question 2:

Do you agree that we do not look for sites in areas of search that require less than approximately 50 dwellings (with the exception of Market Lavington and Cricklade Local Service Centres) to be provided over the remainder of the Plan period to 2026?

Answer: No comment.

Question 3:

Should the plan identify sites for growth within all, some or none of the Large Villages identified in Table 1 (of the leaflet) or if not, what mechanism should be used to identify sites in these settlements?

Answer: No comment.

Question 5:

Do you agree with the methodology for identifying housing sites?

Answer: See point 6 below.

Question 6:

Are there any other factors that should be considered in the methodology that have not been taken into account?

Answer: The NPPF requires land to be allocated to be of least environment and amenity value. Thus at some stage of the process, the amenity value of the land needs to be factored in. NPPF para 74 says (crudely) that existing open space should be avoided, and defines open space as "*All open space of public value, including not just land, but also areas of water (such as rivers, canals, lakes and reservoirs) which offer important opportunities for sport and recreation and can act as a visual amenity*". This is quite a broad definition, and can include (for example, as established by Secretary of State decisions) open land bisected

or adjoined by public right of way. At present it is not clear how the proposed methodology will discriminate between allocating land of higher and lower amenity value. The forthcoming Wiltshire Open Space Study may provide data useful for screening sites.

Question 7:

Do you agree with the options for development? If so, please state which options and why?

Answer: We have not looked at all the maps showing options for developments, but have briefly looked at the following and have the following comments:

Trowbridge

As you are aware, there are a number of important bat roosts associated with Biss and Green Lane Woods. These may make allocations near these woods inappropriate.

Marlborough

Two sites appear to be in the old railway line embankment. It would appear that these sites have exceptionally high landscape sensitivity, and thus development on them would be highly inappropriate.

Question 8:

Is there any option you don't support? If so, please state which option and why?

Answer: See question 7 above.

Question 9:

Are there any other specific sites that we should be considering and if so what are they?

Answer: No comment.

2) Environment Agency (Miss Katherine Burt) Consultee ID: 395940

Question 1:

Do you agree with the approach to identifying the potential 'Areas of Search' where new housing sites could be identified?

Answer: Yes we agree in principle with this approach. We have no comments to make on the level of 50 dwellings being chosen, provided this allows you sufficient enough sites located in Flood Zone 1 (lowest risk) to be allocated in this Wiltshire Housing Site Allocations DPD. Smaller sites (less than 50 dwellings) in Flood Zone 1 may need to be considered in your Allocations DPD, if there are insufficient larger sites (greater than 50 dwellings) available in Flood Zone 1.

Question 2:

Do you agree that we do not look for sites in areas of search that require less than approximately 50 dwellings (with the exception of Market Lavington and Cricklade Local Service Centres) to be provided over the remainder of the Plan period to 2026?

Answer: We have no comments to make on the level of 50 dwellings being chosen, provided this allows you sufficient enough sites located in Flood Zone 1 (lowest risk) to be allocated in this Wiltshire Housing Site Allocations DPD. Smaller sites (less than 50 dwellings) in Flood Zone 1 may need to be considered in your Allocations DPD, if there are insufficient larger sites (greater than 50 dwellings) available in Flood Zone 1.

Question 3:

Should the plan identify sites for growth within all, some or none of the Large Villages identified in Table 1 (of the leaflet) or if not, what mechanism should be used to identify sites in these settlements?

Answer: No comment.

Question 4:

Are there any other factors that should be used to inform the identification of Areas of Search or the level of growth to be provided?

Answer: Groundwater Source Protection Zones should also be considered when selecting sites, because particular care would need to be taken at these sites, to ensure impact on groundwater does not occur. Our Groundwater Protection: principles and practice (GP3) document should help you with this process. Here is a link to our GP3 document:

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

Question 5:

Do you agree with the methodology for identifying housing sites?

Answer: Yes we agree in principle with the methodology.

We note on page 7 that ‘*Land will be initially ruled out using GIS if it is located within any of the following strategic criteria:...Land within flood zone 2 or 3*’. We agree with Flood Zone 2 or 3 being included as strategic criteria.

We also note on page 7 in the ‘*Evidence gathered once options are generated:*’ section, that ‘*Flood risk assessments*’ are included in this list. We support this inclusion as well.

Question 6:

Are there any other factors that should be considered in the methodology that have not been taken into account?

Answer: No we do not believe so, but we note this is a fairly high level methodology.

Settlement option maps

All sites

All forms of flooding

We are pleased to see that Flood Zone maps have been included in the option maps. However, these flood maps do not include other forms of flooding, such as that relating to surface water or groundwater flooding sources. The lead for these sources of flooding would be the Lead Local Flood Authority (LLFA), Wiltshire Council. Therefore, when considering any of the sites for allocation, other forms of flooding will also need to be taken into consideration. We strongly recommend that you consult with your colleagues at Wiltshire Council who deal with Flood Risk Management and Drainage issues regarding these issues.

Water supply and foul drainage

All sites should connect to mains water supply and foul drainage, operated by a water company. We would advise that you contact the relevant water companies to ensure there would be adequate water supply and foul drainage capacity for the proposed allocations in each of the settlements.

Groundwater Protection Zones

As mentioned in the methodology questions above, we would recommend that groundwater Source Protection Zones are also included in your constraints check of sites. Measures may need to be put in place to minimise any impact on groundwater, if a site is located in a Source Protection Zone

Collingbourne Ducis

A couple of the sites encroach close or are marginally within the flood zones, hence demonstration of the Sequential Test and/or sequential approach will be required. This is a requirement in the National Planning Policy Framework (NPPF).

Amesbury, Bulford & Durrington

Site 3077 encroaches within the flood zones hence demonstration of the Sequential Test and/or sequential approach will be required.

Market Lavington

From reviewing the 'Stages of Assessment' map, it appears that site 712 is a 'Refined Options carried forward'. However, it appears that this site falls within FZ2/3, hence demonstration of the Sequential Test and/or sequential approach will be required.

Marlborough

Site 380 encroaches within the flood zones hence demonstration of the Sequential Test and/or sequential approach will be required.

Melksham and Bowerhill

Some concerns with the proposed employment areas because of encroachment into the flood zones, in particular around Shurnhold. Some of the areas shown will be within the functional floodplain (Flood Zone 3b), and not therefore appropriate for built development (less, more or highly vulnerable flood risk vulnerability) as set out in NPPF. We recommend these areas be amended to reflect the guidance set out in NPPF.

Netheravon

Site 576 encroaches marginally within the flood zones hence demonstration of the Sequential Test and/or sequential approach will be required.

Salisbury and Wilton

Site SAL2 encroaches within the flood zones hence demonstration of the Sequential Test and/or sequential approach will be required.

Sites SAL3 and S243 are very close to the flood zones, hence any encroachment into the flood zones will require demonstration of the Sequential Test and/or sequential approach will be required.

Trowbridge

Site 425 encroaches close or is marginally within the flood zones hence demonstration of the Sequential Test and/or sequential approach will be required.

Sites 1021, 3260, 263 and 261 encroach within the flood zones hence demonstration of the Sequential Test and/or sequential approach will be required.

CP2 Mixed Use Allocation (area around Biss Farm) includes a large area of flood zones (3 & 2). We strongly recommend delineation of the allocation be amended to reflect the extent of the flood zones.

3) Historic England (Mr Rohan Torkildsen) Consultee ID: 403792

Question 5:

Do you agree with the methodology for identifying housing sites?

Answer: I recognise that whilst there is a need to pursue a ‘streamlined’ assessment of potential sites, a robust consideration of the positive and negative impact on the historic environment, heritage assets and their setting may not assist. Consequently you will have to consider how national policy for sustainable development and legislative obligations relating to the historic environment can be recognised in an efficient manner. I’m sorry that I do not have the definitive answer how to do this.

The methodology needs to acknowledge that the NPPF requires LPs to set out a positive strategy for the conservation and enjoyment of the historic environment and conserve heritage assets in a manner appropriate to their significance^[1].

In terms of potential site allocations, this means identifying sites for development which are compatible with the LP’s policies for the historic environment and the requirements of the NPPF, the NPPG and primary legislation ^[2] regarding the conservation of heritage assets and the delivery of sustainable development.

The principle of an allocation needs to be informed by adequate, up-to-date and relevant evidence about the historic environment ^[3].

A heritage asset is defined as a building, monument, site, place, area or landscape identified as having a degree of significance because of its heritage interest. Heritage assets include World Heritage Sites, Battlefields, Historic Parks and Gardens, Scheduled Monuments, Conservation Areas and Listed Buildings.

Perhaps consideration of the following criteria may be of use?

Q . *Is it likely the proposed allocation would have a **substantial positive** affect on the significance of the heritage asset/historic environment?*

Q. *Is it likely the proposed allocation would have a **minor positive** affect on the significance of the heritage asset/historic environment?*

Q. *Is it likely the proposed allocation would have **no effect** on the significance of a heritage asset or the historic environment?*

(This may be because there are no heritage assets within the vicinity of the site that is affected by the proposal).

Q. *Is it likely the proposed allocation would have a **minor negative** affect on the significance of the heritage asset/historic environment (including a consideration of its setting)?*

Q. Is it likely the proposed allocation would have a **substantial negative** affect on the significance of the heritage asset/historic environment (including a consideration of its setting)?

Appendix E: Review of the site selection methodology

- 1.0 Following an assessment of comments received through the informal consultation on the methodology and initial findings relating to the identification of housing allocations (February - March 2015) a review has been carried out to ensure the methodology for identifying housing sites across Wiltshire is robust and effective. The suggested changes, as well as other changes made to the methodology, are set out in this report.
- 1.1 The methodology was originally devised in Spring 2014 and built on previous site assessment work undertaken and case studies.
- 1.2 The consultation statement suggests three areas for review following the informal consultation on the methodology and initial findings relating to the identification of housing allocations (February - March 2015). These are:
 - Theme 1: The approach to identifying potential ‘areas of search’
 - Theme 2: The overall methodology
 - Theme 3: The approach to Large Villages

Theme 1: The approach to identifying potential ‘areas of search’

- 2.1 The original methodology split the County into broad areas of search. To ensure conformity with the WCS (adopted January 2015) the broad areas of search have been based on the settlement strategy (CP1) and therefore comprise Principal Settlements, Market Towns and Community Area remainders (these are likely to contain a number of Large Villages and a Local Service Centre in a few locations).
- 2.2 Site options were not being sought where the following criteria applied:
 - Where there is no remaining requirement until after 2026.
 - Where the remaining requirement is less than approximately 50 dwellings until 2026.
 - Where the requirement is met through a neighbourhood plan that has reached at least Examination.
 - Where the requirement is met where new information on allocated sites suggests higher delivery figures.
- 2.3 During the consultation consultees were asked whether they agreed with the approach to the areas of search. At the workshop for developers, landowners and other consultees attendees were asked a series of questions on the areas of search including whether previously developed land should be allocated within the plan. The analysis of the consultation responses can be viewed below:

Table 1: Table showing matters identified through the informal consultation relating to areas of search, and action taken

Consultation Matter	Action
Maintain approach to dividing the HMAs into broad areas of search based on the Core Strategy settlement hierarchy. This has the benefit of maintaining a clear line of general conformity with the Core Strategy.	Approach maintained
Consider whether an increased requirement should be enabled in any locations and, if so, why.	The housing requirements should only be changed through the WCS Review process unless evidence indicates otherwise.
Consider whether any locations that have met their indicative housing requirement should be assessed to deliver further housing allocations.	The housing requirements should only be changed through the WCS Review process unless evidence indicates otherwise.
For areas of search with an indicative housing requirement of less than approximately 50 dwellings for the remainder of the plan period – assess whether these areas are strategically required to: <ul style="list-style-type: none"> • help provide a level of assurance in terms of supply in the HMAs over the plan period; and, in doing so, • how these areas will be treated in policy terms if further housing sites are not allocated; and therefore • whether there are reasonable opportunities within these areas to consider if we believe that we should not stick rigidly to the indicative housing requirements. 	<ul style="list-style-type: none"> • 12 town and parishes commented on this with 7 supporting the criteria and 5 objecting. • 61 developers and landowners commenting on this with 8 supporting and 53 objecting. • The '50' figure was not considered justified. • The criteria would exclude some good sites. • In summary the consultation response supports removal of this criterion. Remove criterion not looking at sites with a requirement of 50 dwellings or less until 2026.

2.4 The revised methodology still prioritises the allocation of housing sites at Principle Settlements, Local Service Centres, Market Towns and those Large Villages where land supply needs to be supplemented to meet distribution and levels of housing set out in the WCS. The baseline housing information is updated annually and includes sites allocated in neighbourhood plans.

2.5 The criterion which excluded areas of search with a requirement of less than 50 dwellings has been removed to ensure flexibility in different geographies and that sites are allocated in the most sustainable location.

Theme 2: The overall methodology

3.1 The following matters were identified for review:

Table 2: Table showing matters identified through the informal consultation relating to the methodology and action taken

Consultation Matter	Outcome
Reconsider the application of certain strategic and discretionary criterion to	This has been taken into account as the Sustainability Appraisal (SA) process has

determine if they are applied/considered at the most appropriate stage.	been embedded within the revised site selection process (Stage 3 of the methodology).
Consider the appropriateness and use of additional assessment criteria to determine site suitability. Reconsideration of the overall discretionary 'scoring' process of site assessment and application of accessibility criteria.	This has been taken into account as the SA process has been embedded within the revised site selection process (Stage 3).
Whether to allocate previously developed land (PDL) sites within existing settlement boundaries through the plan or whether to allow national and local policy to deliver this	National and local policy already enable the development of PDL sites within existing settlement boundaries and important PDL sites may be advanced swiftly by more flexible development briefs or through the pre-application process.
The appropriateness of grouping sites into 'options' or whether to solely present sites individually.	Comments from developers through the informal consultation have said that combining numerous sites into options rather than considering each site on its own merits has led to an unfair assessment of some sites. To avoid this each SHLAA site is now considered on its own merits and sites are only combined, for assessment purposes only, if it becomes clear that they could create one urban extension or where there are clear wider benefits to doing so.
Determine whether it is necessary and feasible to undertake 'local needs assessments' to feed into the methodology and assessment process.	This will be carried out through neighbourhood planning processes and can be fed in via the consultation process if appropriate.

Table 3: Table showing matters identified through the informal consultation relating to the discretionary criteria and action taken

Criteria put forward through consultation	Response
Historic England have suggested that the methodology must acknowledge that the NPPF required plans to set out a positive strategy for the conservation and enjoyment of the historic environment, and conserve heritage assets in a manner appropriate to their significance. A 'heritage asset' is a building, monument, site, place or landscape identified as being significant due to its heritage interest. Suggests using a sliding scale of impact and grouping historic designations together.	The SA decision aiding questions on the historic environment are now much broader and covers the comments made by Historic England. Heritage assets have been broadened to include World Heritage Sites, Battlefields, Historic Parks and Gardens, Scheduled Monuments, Conservation Areas and Listed Buildings.

Add amenity value and protected open space. This was put forward in a number of responses. Natural England also suggested amenity value should be a consideration as the NPPF requires allocated land to be of the least environmental and amenity value.	Open space and amenity value is now considered through the SA decision aiding questions.
Coalescence of towns and villages	This is an issue in a number of locations across Wiltshire and needs to be considered on a place by place basis. It will be identified via consultation and taken into account through the landscape element of the SA.
Priority given to previously developed land	Priority is already given to previously developed land through national guidance and the WCS.
Infrastructure capacity	This is being taken into account through consultation with infrastructure providers and further detailed work will be carried on sites where required.
Planning gains, regeneration opportunities, enhancements to heritage assets	These will be identified and considered via the consultation process.
Local knowledge	This will be input through the consultation process.
Accessibility, access and road capacity including access to primary schools and leisure facilities	Accessibility is now being considered through several SA decision aiding questions whilst access is considered at Stage 2A as part of the exclusionary criteria and again in Stage 4A alongside road capacity.
Assessment of local services in Large Villages, community facilities	This has already been carried out through the WCS spatial strategy background work.
Market attractiveness	This will be considered through viability work.
Impact on residential amenity	This has been considered in Stage 4A but will also be considered through the consultation process.
Conservation area appraisals	These will be considered on a site by site basis where appropriate. Where these have been published already they are taken into account in the SA.
Landscape assessment	This will be carried out on a site by site basis where appropriate.
Contingency	Housing supply constantly shifts and should it be identified that further sites should be allocated this will be carried out through the DPD review process.

Employment land review	This has been taken into account through the WCS process.
Reference to national policy	This can be found in the topic papers.

Theme 3: The approach to Large Villages

- 4.1 The informal consultation found that there was local support for identifying housing sites at the Large Villages and consequently the methodology has been amended to enable the identification of sites at Large Villages where necessary.
- 4.2 Annex C of the consultation statement suggested there were four options to meet housing requirements in Community Area Reminders as follows:
- Consistently identify site allocations at all Large Villages.
 - Identify site allocation at some Large Villages, based on need, suitability of sites and local policy constraints.
 - Amend Core Policy 2 of the WCS to provide a more permissive policy approach toward sites outside of settlement boundaries.
 - Develop a criteria based approach to housing development in the Community Area Reminders to address housing supply whilst maintaining a degree of control of where such development should take place by taking account of local need and policy constraints.
- 4.3 The latter two options are outside of the remit of the Plan and instead would need to be addressed through a review of the Core Strategy. As the informal consultation response generally supported the identification of sites at Large Villages, and because housing is not required in all community area reminders, bullet point two has been taken forward to enable site allocations to be identified where needed and where sites are the most sustainable. Consequently a new section of the methodology has been developed which reflects the findings of the informal consultation that sites should be identified at the Large Villages. This is stage 2B of the methodology. The assessment of Large Villages is based on numerous factors and ensures sites are identified in the most sustainable Large Villages.

Reviewing the site selection methodology

- 5.1 Through working with consultants on the ongoing sustainability appraisal for the plan it became apparent that work was often being duplicated. The informal consultation process also found that the methodology needed to be more transparent. It was recommended by the consultants carrying out the SA work that the sites identification process and SA could be merged into one process (Stage 3). This would ensure sustainability was at the very core of the process and provided a more transparent process. As part of this process decision aiding questions were reviewed and updated having regard to the outcomes of the consultation outlined in table 3 above.

5.2 The original and revised methodology can be found in appendix A along with a justification for key changes.

Appendix A: Comparison of published sites assessment methodologies from February 2015 and June 2017 and justification for the changes

Site Selection Methodology February 2015	Site Selection Methodology June 2017	Justification for changes
<p>Stage 1: Identify broad areas of search and potential site options</p> <p>Map housing supply across the HMAs and identify housing supply deficit based on the settlement hierarchy.</p> <p>Sites options were not sought where the following criteria applied:</p> <ul style="list-style-type: none"> • Where there is no remaining requirement until after 2026. • Where the remaining requirement is less than approximately 50 dwellings until 2026. • Where the requirement is met through a neighbourhood plan that has reached at least Examination. • Where the requirement is met where new information on allocated sites suggests higher delivery figures. <p>Identify SHLAA sites within areas of search.</p>	<p>Stage 1: Areas of search</p> <p>Prioritise the allocation of housing sites at towns and areas where land supply needs to be supplemented to meet distribution and levels of housing set out in the WCS.</p> <p>The baseline housing information is updated annually and includes sites allocated in neighbourhood plans.</p>	<p>This stage remains fundamentally the same. Areas of search are based on the settlement hierarchy and housing distribution set out in the WCS and the latest housing land supply data.</p> <p>The original methodology included a criterion that didn't look in areas of search with a requirement of less than 50 dwellings until 2026. In the informal consultation on the draft site selection there were a number of comments on how this criterion was justified and whether it was too rigid. On review the criterion not looking at areas with a requirement of less than 50 dwellings is removed. This enables more flexibility to identify sites in the most sustainable locations.</p> <p>The 2015 methodology included sites within the settlement boundary. These are now removed from the process as their development is already enabled through other policy formats.</p>

Site Selection Methodology February 2015	Site Selection Methodology June 2017	Justification for changes
<p>Stage 2: Review area of search using strategic criteria</p> <p>Apply the strategic criteria to rule out swathes of land and SHLAA sites that are considered to be potentially unsuitable for development.</p> <p>Sites of less than 5 dwellings not considered.</p> <p>The strategic criteria are: Land within the Green Belt Land within flood zone 2 or 3 Land within any strategic environmental designations. These are:</p> <ul style="list-style-type: none"> • SAC • SPA • Ramsar sites • National nature reserves • Ancient woodland • SSSI • Parks and gardens <p>Land within a World Heritage Site or affected by a scheduled monument Land within an AONB Land within a Mineral Safeguarding Zone</p> <p>If sufficient capacity is not available land in the AONB and Mineral Safeguarding Areas was added back into the assessment process. For further detail on the original approach to these two criteria see February 2015 methodology⁶.</p> <p>Also consider whether:</p> <ul style="list-style-type: none"> • There are any insurmountable infrastructure issues? • There are any significant landscape constraints that cannot be mitigated? 	<p>Stage 2: Strategic assessment comprised two stages:</p> <p>Stage 2A Exclusionary Criteria: Within the areas of search the SHLAA provides a pool of land opportunities for possible housing development.</p> <p>Land other than SHLAA sites has not been considered for inclusion as it cannot be said that it is available within the plan period.</p> <p>The site selection process considers the SHLAA sites suitability for allocation.</p> <p>A systematic strategic assessment has tested each SHLAA site against constraints that are barriers to development. These are: Is it fully or partly a commitment? Or fully or partly within a Principal Employment Area, or other existing development plan allocation? Or is the site isolated from the urban edge of the settlement i.e not adjacent to the settlement boundary and not adjacent to a SHLAA site that is? Is it fully within the settlement boundary⁷? Is it fully or partly within the following strategic environment designations?</p> <ul style="list-style-type: none"> • SAC • SPA • Ramsar sites • National Nature Reserve • Ancient woodland • SSSI <p>Is it fully or partly within the green belt? Is it fully or partly within flood risk zones 2 or 3? Is it fully or partly within the following internationally or nationally designated heritage asset: World Heritage Site Scheduled Ancient Monument Historic Park and Garden Registered Park and Garden Registered Battlefield Is the site available, developable and suitable?</p>	<p>The informal consultation findings suggested that Minerals Safeguarding Areas should not be strategic criterion because development can occur within these areas subject to numerous checks. Consequently this criterion has been moved to stage 3.</p> <p>The following questions have been removed from this stage as they are discretionary in nature:</p> <ul style="list-style-type: none"> • There are any insurmountable infrastructure issues? • There are any significant landscape constraints that cannot be mitigated? <p>A red and green traffic light system has been added to this stage to present the application of the strategic criteria.</p>
<p>⁶ The Housing Sites Selection Methodology February 2015 can be found here: http://consult.wiltshire.gov.uk/portal/spatial_planning/sites_dpd/informal_consultation_on_initial_site_options?tab=files</p>		

⁷ Sites within the boundary can already come forward and are removed.

Site Selection Methodology February 2015	Site Selection Methodology June 2017	Justification for changes
	<p>Stage 2B Large Villages and Local Service Centres</p> <p>The WCS provides a housing requirement for community area remainders. These can contain numerous Large and Small Villages and in some instances a Local Service Centre.</p> <p>Assessment of Large Villages based on numerous factors. For further detail see Topic Paper 2: Wiltshire Housing Sites Allocations DPD.⁸</p> <p>Based on the assessment a number of Large Villages are excluded from further assessment.</p>	<p>This is a new section of the methodology which reflects the findings of the informal consultation that sites should be identified at the Large Villages.</p>
<p>Stage 3: Apply the discretionary criteria to the remaining sites</p> <p>The following ‘discretionary criteria’ were applied (a score of 1 is given for a positive answer and added to the overall scoring for the site):</p> <p>Is the site option located on Previously Developed Land?</p> <p>Is the site option located outside of Best and Most Versatile Agricultural land (i.e. Grades 1, 2 and 3a)?</p> <p>Is the site option located outside of protected employment space?</p> <p>Is the site option free of identified obstructions?</p> <p>Is the site option located outside of historic environment designations (such as conservation areas, listed buildings, battlefields)?</p> <p>Is the site option located outside of other environmental designations (such as County Wildlife Sites)?</p> <p>Overall accessibility score (measure against the parameters below):</p> <p>The accessibility score is based on the following criteria:</p> <p>Is the site within:</p> <ul style="list-style-type: none"> 40 mins of employment 20 mins of employment 40 mins of a secondary school 20 mins of a secondary school 60 mins of further education 30 mins of further education 30 mins of a GP 15 mins of a GP 60 mins of a hospital 	<p>Stage 3: Sustainability Appraisal</p> <p>Remaining potential sites have been assessed using SA.</p> <p>This is carried out using 12 sustainability objectives which can be found in Topic Paper 2: Wiltshire Housing Sites Allocations DPD.⁹</p> <p>The performance of each site has been assessed against each of the objectives using a consistent set of decision-aiding questions. Each option was then scored under each objective based on a generic assessment scale from major positive to a major adverse effect.</p>	<p>The original methodology applied a list of discretionary criteria to the remaining sites. The discretionary criteria were factors that must be taken into account when considering the sustainability of a site but which do not preclude development and which can often be mitigated with varying degrees of difficulty.</p> <p>In the original methodology a numerical scoring system was applied to the discretionary criteria.</p> <p>Due to the volume of sites the Council had to consider, and in order to allocate site across the whole of Wiltshire, this numerical scoring was simply seen as comparative tool enabling sites to be compared within any given area of search, and was used to rule out some very low scoring sites. The numerical scoring was not used in isolation but as an aid to help officers assess each site.</p> <p>Following the consultation analysis and also feedback from the consultants carrying out the SA of the sites it was considered that the scoring mechanism was too rigid and that it also duplicated issues being assessed through the SA methodology. Instead stage 3 will comprise the SA process itself.</p> <p>Numerous new criteria were suggested through the informal</p>

8

9

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<p>30 mins of a hospital 30 mins of a town centre 15 mins of a town centre 30 mins of a food store 15 mins of a food store Score as follows (a positive answer scores 1, a higher overall score indicates a more accessible site): If a site meets 1-5 of the above parameters a score of 1 is given. If a site meets 6-10 of the above parameters a score of 2 is given. If a site meets 11-14 of the above parameters a score of 3 is given. Scores have been amalgamated to fit into the wider scoring mechanism.</p> <p>Determine if there are any locally specific criteria that should be added to the table.</p> <p>These criteria will be used to compare and rank site options, alongside other available evidence, to ensure that the most suitable site options are considered.</p>		<p>consultation process. Table 3 outlines these and these are incorporated into the SA decision aiding questions.</p>
<p>Stage 4: Develop options</p> <p>Following a review evidence the following questions were answered: What quantum of development is required within the area of search? Is there sufficient capacity remaining once the strategic criteria have been applied? Is the land available at the right point during the plan period? If not, return to stage 2 and review the application of the strategic criteria.</p> <p>The following evidence was then used to develop initial options:</p> <ul style="list-style-type: none"> • Initial site assessment scores and SA/SEA baseline data • Core strategy objectives • Any neighbourhood planning objectives • Infrastructure Delivery Plan <p>The following evidence was then sought: Site visits SA/SEA of options Application of Landscape Character Assessment Ecological comments</p> <p>Sites were sometimes combined into groupings of sites as one option for sustainability assessment.</p>	<p>Stage 4: Selection of preferred sites and developing plan proposals</p> <p>Stage 4A: Selection of preferred sites Individual site options are analysed further. Sites taken forward to this stage are the sites identified as most sustainable in an area in stage 3. Further consultation with stakeholders provided further evidence.</p> <p>Stage 4A is carried out in five steps. Steps 1-4 are carried out for each site. Step 5 considers the area of search as a whole and selects and justified the preferred options.</p> <p>Step 1 – Assesses the significant effects of a site using stakeholder comments and other evidence. Step 2 – Considers how a site would contribute to an area strategy. Step 3 – Considers whether a site at a Large Village conforms to Core Policy 1. Step 4 – Summary conclusion for each site. Step 5 – Selects preferred sites.</p> <p>Stage 4B: Testing plan proposals Review of housing supply in an</p>	<p>Most elements of stage 4 and 5 of the original methodology have been combined into a more comprehensive list of actions in stage 4 of the current methodology.</p> <p>Fundamentally the SA is no longer carried out separately but forms an integral part of the assessment process.</p> <p>Another key change is that the original methodology often grouped sites together into options and the SA was carried out of the grouped sites. This influenced the outcome of the SA and consequently each SHLAA sites is now considered on its own merits.</p>

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	area.	
<p>Stage 5: Refine options Stage 4 information as used to refine options. Further detailed evidence was applied at this stage for example, landscape assessment and Habitats Regulation Assessment. Internal specialists were consulted on sites. This includes applying sustainability appraisal findings of the stage 4 sites.</p> <p>Viability Assessment would have been carried on site options had this methodology continued.</p>	<p>Stage 5: Viability Assessment</p>	<p>As above</p>
<p>Sustainability Appraisal is carried off the stage 4 options and used to define options at stage 5.</p>	<p>Stage 6: Sustainability of Plan Proposals and Habitats Regulations Assessment</p>	
	<p>Stage 7: Draft plan</p>	

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>