

**Statement by Berkeley Strategic - Matter 4: Settlement Boundaries – March 2019**

1. This Statement is submitted by Berkeley Strategic in relation to the Wiltshire Housing Site Allocation Plan Examination.
2. Berkeley owns an allocated development site of 7.2 hectares off Horton Road, Devizes. The Site is allocated for employment uses in the Wiltshire Core Strategy (Core Policy 12). Berkeley is currently working with the Council to bring forward development on the site.
3. Berkeley submitted a consultation response in September 2017 to the draft plan seeking a modification to the proposed settlement boundary to include the site within the settlement boundary of Devizes, so that the boundary would be consistent with the Core Strategy allocation for development (Core Policy 12).
4. As the site remains outside the settlement boundary in the latest version of the Housing Site Allocation Plan, we wish to respond to the questions set out under Matter 4: Settlement Boundaries / Issue 6 as follows.

***Issue 6: Are the proposed settlement boundaries justified, effective and consistent with national policy?***

***6.1 What is the policy basis for use of settlement boundaries and their review?***

5. The Wiltshire Core Strategy did not review settlement boundaries but committed reviewing them through the Wiltshire Housing Site Allocations and Chippenham Site Allocations DPDs (paragraph 4.13).
6. The Council's Topic Paper 1, relating to the settlement boundary review methodology, explains that where there is an adopted Neighbourhood Plan a full review of the relevant settlement boundary has not been undertaken. It also explains that, although the Council initially intended to include allocated development sites within settlement boundaries, in response to feedback it subsequently adjusted the methodology to exclude them.
7. As set out below Berkeley considers this aspect of the Plan to be unsound because it creates an inconsistency in relation to allocated sites such as the Horton Road site in Devizes, which remains outside the Devizes settlement boundary, whereas other allocated sites are within it.

***6.2 Is the Council's methodology for reviewing settlement boundaries soundly based?***

8. As above we consider the methodology for reviewing settlement boundaries not soundly based in all respects as it does not achieve consistency with the adopted Core Strategy.
9. It also does not fully meet the commitment made in paragraph 4.13 of the Core Strategy to review boundaries through this Plan.

**6.3 Has the review of settlement boundaries been carried out in a consistent manner across the plan area?**

10. The approach is inconsistent because it does not review boundaries where those boundaries have been previously considered by the Neighbourhood Plan. There is also inconsistency in relation whether allocated sites are included or excluded from settlement boundaries, with the Council having amended its approach to this issue in response to feedback.
11. The approach creates a potential conflict in the development plan in that development brought forward on an allocated site such as Horton Road, Devizes in accordance with Core Policy 12 would be contrary to Core Policy 2, which states development will not be permitted outside the limits of development, as defined on the policies map.

**Specific settlements**

**6.4 For specific settlements, are there any factors which indicate the settlement boundary is not justified or effective?**

12. The Devizes Neighbourhood Plan (adopted in 2015) only includes sites within the settlement boundary that are allocated for housing and not employment. As set out in the Topic Paper (paragraph 6.5), it is understood that the reason behind this was a concern from parish and town councils that including employment sites in the boundary might facilitate their development for residential development.
13. Berkeley does not agree with this logic as any development proposals to change from employment to residential would still be subject to the policy requirements of the development plan, including Core Policy 12 and Core Policy 35 of the adopted Core Strategy, or any replacement policies brought forward in due course as part of the new Local Plan. This point is acknowledged by the Council in Topic Paper 1 (paragraph 7.11).
14. Notwithstanding the position in the Neighbourhood Plan, which is now nearly four years old, the Housing Site Allocations Plan provides the opportunity to regularise the settlement boundary of Devizes so that it includes allocated development sites.
15. Therefore the boundary should be adjusted to include the allocated development site at Horton Road, Devizes within the Devizes settlement boundary. This would be correct and consistent planning, resolving the current inconsistency. The inclusion of the site would remove any ambiguity in relation to the status of the site and help facilitate its future development.