



Wiltshire Site Allocations Plan (WHSAP) Examination

Statement of Jeff Ligo – Chair of Bratton Parish Council

1. I am aware of the need to ensure that the Inspector does not wish representations already made to be repeated. This statement is in two parts. The first sets out some further material regarding site 321. The second relates to a proposed amendment to the Settlement Boundary which the Parish Council is recommending.

Site 321 (H2/13) Cassways/Court Orchard

2. The Council has submitted at different stages two letters to Wiltshire Council setting out its objections to site 321 (H2.13 previously H2/14). These letters are dated 22 September 2017 and 6 November 2018. For the avoidance of doubt the second letter's content was endorsed by the Council at its November meeting. (see final paragraph).
3. The significant changes which the Council wish to bring to the Inspector's attention since its letter of 6 November are set out in the paragraphs below.
4. The Council is pleased to note that site 738 will not form part of the Examination and will be re-assured by para 9 of the Inspector's Guidance Note that this site will be treated as an 'omission' site and will not be discussed at the hearing sessions.
5. A copy of the completed Housing Needs Survey referred to in para 16 of the letter of 6 November has been lodged with the Inspector. That report demonstrates that the identified housing need in the village is extremely small and is focussed on meeting the needs of young people and assisting 'down sizing' for older ones.
6. Significant public objection has been raised relating to the inclusion of this site. The Council and Neighbourhood Plan Steering Group have worked hard to raise the awareness of the community to this proposal and the Inspector will note the amount of representations that has been received.
7. Significant progress has been made with the development of the Neighbourhood Plan and the acting chair of the Neighbourhood Plan Steering Group will be drawing these to the attention of the Inspector.
8. There is increasing concern within the community about the capacity of the B3098 which would serve as the access road to the site. It is hoped the Inspector will obtain from Wiltshire Council the latest projections regarding usage of this road. It is interesting that the Council used the traffic safety issues to rule out a site across the road from 321 yet ignored this problem in relation to this site.

Extension of the Settlement Boundary – Land adjoin Kahja, Milditch Lane

9. The letter of 22 September sets out the Council's concerns regarding the revision of the settlement boundary which will be considered at the Examination.
10. Just after the close of the consultation period on the Schedule of proposed changes the Council was approached by the owner of the site marked with an 'X' on the attached plan. The boundary of the proposed Settlement Boundary is shown in Green on the plan, the current boundary in yellow.
11. Set out below is a copy of the Minute of the Parish Council at its meeting on 13 November 2018.

Plot of Land adjoining Kajha, Milditch Lane

The Chair tabled plans relating to this plot of land, explaining that this had been excluded from the new settlement boundary. The owners had informed the Chair that they had made representations to Wiltshire Council requesting the land be included in the settlement boundary and were asking whether the Council wished to support this position. Members discussed the request, noting that there would need to be a rationale for requesting any alteration to the boundary and that caution would need to be exercised in order to ensure that no precedent was being set. The Chair stated that the land was a single plot and could not, in his opinion, be used as a precedent because it was between Kajha and the Council's allotments. The Chair proposed that the Council write to Wiltshire Council to support the owners' request, this was seconded by Cllr Ridley and resolved.

12. I recognise that this is a very small matter in relation to the scheme of things but the Council hope the Inspector will be able to support the request of the Owners to include this plot within the settlement boundary.

Jeff Ligo
7 March 2019

**Bratton
Parish Council**



Clerk to the Council: Ms. Nicola Duke
6 Shetland Close, Westbury, Wiltshire, BA13 2GN
Phone/Fax: 01373 864127
Email : nicola.duke@bratton-parish.co.uk

6 November 2018

Ms Georgina Clampitt-dix
Spatial Planning, Economic Development & Planning
Wiltshire Council
County Hall
Bythesea Road
Trowbridge BA14 8JN.

Dear Ms Georgina Clampitt-dix

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

1. This letter, drafted by the Chair and vice-Chair, is sent to you as a holding response as agreed in an exchange of emails I had with you. The content will be considered by the Council on 13 November and I will let you have details of any further comments, deletions or amendments by 14 November.
2. The Council is disappointed that this further consultation has come about at this late stage after the appointment of the Inspector. The Guidance on responding to the consultation which you sent to me is complicated and this further consultation compels the Council to repeat that the whole process is incredibly difficult for lay persons to understand.
3. The amount of documentation and the scale of the alterations introduced is overwhelming. Appendix 1 attached to this letter itemises the changes that have been identified which relate to the Parish. In this letter, the Council has tried to simplify the issues and endeavoured to respond by reference to the four principles that the Inspector will apply when considering your Council's submission – namely positively prepared, justified, effective and consistent with national policy.
4. The Council responded in detail to the original submission with a letter of representation dated 22 September 2017, a copy of which is annexed at Appendix 2. This further representation needs to be read in conjunction with that letter. The principal issue that the revised consultation has brought to the attention of the Council is the re-admission of site 738 south of Westbury Road almost opposite to the included site 321, and the consequential addition of many new pages of Proposed Changes and the wholesale re-writing of the Bratton section of the Community Topic paper of Westbury.

Conflict with existing policy

5. The Council's position is that they are opposed to the scale of the development proposed on each of those sites. Inclusion of either is in fundamental conflict with Wiltshire Council's own Core Strategy. That Strategy states that the priority is to locate housing development in the top two tiers of settlements, the Principal Settlements of Chippenham, Trowbridge and Salisbury and the Market Towns, including Westbury. Furthermore the Core Strategy recognises that the other areas of the County are rural countryside which need protection. There is no strategic need to develop in open countryside adjoining Large Villages.

6. The Core Strategy Policy No 1 reads:-
Large Villages are defined as settlements with a limited range of employment, services and facilities. Small Villages have a low level of services and facilities, and few employment opportunities.

Development at Large and Small Villages will be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities.

At Large Villages settlement boundaries are retained and development will predominantly take the form of small housing and employment sites within the settlement boundaries.....Small housing site are defined as sites involving fewer than 10 dwellings

7. **The proposals in this Plan are totally inconsistent with the Council's own Core Strategy. The Plan is not positively prepared and the proposals are not justified when weighing this evidence.**

Core Strategy targets delivered

8. According to the Regulation 22 (1)(9)(C) statement the purpose of the Plan is to:
Allocate sites for housing to ensure the delivery of homes across the plan period in order to maintain a five year land supply in each of Wiltshire's three HMAs over the period to 2026.

9. The Target for the Westbury Community Area identified in the Core Strategy was 1,615 houses (sub-divided 1,500 to the Town 115 to the Remainder). Paras 2.9, 2.10 and 2.11 and table 2.3 have been added to the Wiltshire Site Allocation Plan – Westbury Community Area Topic paper following receipt of the latest figures contained in the Housing Land Supply Statement.. Para 2.11 makes it clear that the developable commitments 2017 -2026 shown in the Table 2.3 **excludes any proposed allocations.**

10. This Table shows that, so far, the Town of Westbury has delivered 940 homes and the Remainder 60. So a shortfall of 615. The developable commitments (**excluding any proposed allocations**), in the Westbury Community Area amount to 862 making a total 1862. This is an over-provision of 242 (15.29%), way in excess of the total of 1,615 originally allocated in the Core Strategy.

11. In the Market Lavington Topic paper the following appears at 7.2:-
However, in the light of the significant supply of housing land in the East Wiltshire Housing Market Area the Council's Schedule of Proposed Changes (July 2018)

proposed the deletion of the site allocations that emerged from the site assessment process. Similar to the position with Large Villages there is the opportunity, as set out in paragraph 6.4, for the Market Lavington Parish Council to allocate land for housing in their emerging Neighbourhood Plan.

12. So a 'significant supply of housing land' in one community area has led to the deletion of sites in a community identified as a Local Service Centre and by definition, therefore, one that is intended to have some significant development. Why cannot a similar decision be made in respect of a Large Village and allow the Neighbourhood Planning process to identify and allocate land for housing to meet local need in accordance with the requirements of the Core Strategy and Government policy?
13. **The target for the Westbury Community Area has been met. Government Policy has been complied with and the provision identified in the Core Strategy for the number of homes in the Westbury Community Area achieved. The allocation of sites in Bratton is not justified in the light of the evidence produced in the Housing Land Supply Statement.**

Neighbourhood Plan

14. Prior to the election in May 2017, the Council had considered the cost and effort in developing a Neighbourhood Plan was unnecessary, in the light of the Core Strategy Policy stating clearly that housing in Large Villages should be confined to meeting local needs. The Council elected last May, however, resolved to develop a Plan.
15. A Steering Group was established in February 2018 after a series of public meetings and a Parish wide survey. It is clear from all the responses that there is no fundamental objection to further housing in the Village. What is of concern is the 'suburbanisation' of the village by the creation of high density developments. With housing numbers of 35 -40 and 22 which far exceed the definition of "mall housing" of fewer than 10 dwellings.
16. The Neighbourhood Plan is well underway albeit with a six months' delay whilst the Council waited for a County Liaison Officer to be appointed. A Housing Needs Survey has been carried out. The draft report has just been received. It shows a small demand for local housing (5 properties). Once the final version is received the Council will forward the Report to the Inspector. The Neighbourhood Plan will be analysing potential sites to meet the housing need identified and will be carrying out further work to refine the information by considering evidence provided by Wiltshire Council's Housing Register and the Strategic Housing Market Assessment. The Westbury Area Topic paper on page 66 used information from the 2013 Housing Survey to identify local need. The new survey reduces demand from 8 to 5. Potential for housing within the village existing village settlement boundary is shown as Omission Site OM007 in the Proposed Changes. This opportunity will be fully investigated by the Steering Group.
17. **The allocation of either sites 321 or 723 would destroy the Neighbourhood Plan initiative and is contrary to Government Policy which supports communities in developing such Plans. A potential housing site in the Village has been omitted.**

Fundamental error

18. Despite the Council's submission made in 2017 pointing out the incorrect figure the Council's officers have not changed the figures and have repeated the error with site 738. The Westbury Community Area Topic paper still states the Village consists of 819 houses whereas the correct number is 516. An overstatement of 38%.

19. Such an error (not corrected) is not legally sound.

Sustainability, highway, and environmental issues

20. The differentiation between the sites 738 and 321 is negligible at Stage 3 and Stage 4, steps 1 to 4, yet the sustainability of site 321 is assessed as 'good' and site 738 as 'marginal'. The Council has seen the detailed representations of local resident, Fern Joyce, who alongside the vice-Chair of the Council has examined in detail all the documents relating to this consultation. The Council supports and concurs with all the points made in that submission. The Council re-states its concerns in relation to site 321 as set out in the submission letter of 22 September 2017.

21. The decision to reject one site but keep the other is not sound. The decision to allocate so many houses to a Large village is contrary to Government Policy.

Precedent and consistency

22. The Council has not been able to analyse all the changes in the documentation but it notes numerous variations where sites have been excluded for reasons which could equally apply to Bratton. It is noted that some sites in communities where current Core Strategy policy permits housing growth have been removed because (extract from the Market Lavington Community Area Topic paper):-

Development at this site would very likely have a significant adverse impact on the amenity and setting of the Conservation Area. It would be difficult to achieve a pattern of development that protects and enhances the character of the settlement and the Conservation Area. Achieving a suitable access would be problematic without further negative effects on the Conservation Area, neighbouring residents and highway safety.

23. Bratton has all these qualities (see Fern Joyce's representations) yet a contrary decision is taken in respect of sites 321 and 738, eliminated on just a single ground relating to cycling and pedestrian access and safety reasons. By the way, those reasons should apply to both sites as they are almost opposite one another on the same highway but the issue of 'accessibility' for site 321 does not weigh up good cycling connections, unlike for site 738. Nor does it consider the need for cyclists to cross the road when returning to site 321 from Bratton.

24. Based on this inconsistent and unsound approach the Parish Council consider continuing to promote sites in Bratton is unjustified

As I said above, I will confirm the Parish Council's position on November 14 after it has considered this holding letter.

Yours sincerely

Nicola Duke

**Bratton
Parish Council**



Clerk to the Council: Ms. Nicola Duke
6 Shetland Close, Westbury, Wiltshire, BA13 2GN
Phone/Fax: 01373 864127
Email : clerk.brattonpc@yahoo.com

22 September 2017

Spatial Planning, Economic Development & Planning
Wiltshire Council
County Hall
Bythesea Road
Trowbridge
Wiltshire, BA14 8JN.

Dear Sir/Madam

Draft Housing Site Allocation Plan – Site 321 Bratton

This letter contains the issues considered by the Council in reaching its decision to object to the allocation of Site 321 for housing in Bratton. The Clerk passed on the Council's decision in a letter sent to you by email on 14 September and subsequently confirmed in an email of 18 September that the Chair and vice-Chair would be submitting a supplementary paper expanding on the reasons for this decision.

For completeness we will reiterate the decision. The Council resolved:

Wiltshire Council Draft Housing Site Allocations Plan

That the development of the proposed site for 40 houses would have an adverse effect on the conservation area of the parish, impacting the views from higher ground and the White Horse

- That the development would have an adverse impact on local amenity and represented over development*
- That the development would have a detrimental impact on already over burdened infrastructure*
- That there were other potential sites within the existing settlement boundary which needed to be considered which could provide the potential for development to meet local need within the settlement boundary*
- That the increase in residents would represent an unmanageable increase in traffic and create significant highway issues*

Settlement boundary

The council also objected to any change to the settlement boundary for the parish, with the exception of proposing the inclusion of a tennis court at East Marsh Farm Lower Road.

The meeting was attended by 25 members of the public, the majority of whom spoke strongly about the impact that such a development would have on the village.

It is clear from your website that Wiltshire Council expects detailed responses and you set out a series of questions which we will respond to.

For the record we think it is extremely optimistic to expect lay people to have the expertise to respond in the detail required but, thanks to the vice-Chair, the Council has researched the planning policy background to this allocation and we are extremely disappointed by what we have discovered.

Do you consider the Wiltshire Housing Site Allocation Plan is legally compliant and/or sound.

The answer to this is clearly 'No' in each case.

Do you consider the Plan is unsound because it is not positively prepared, justified, effective and consistent with national policy.

None of these factors are satisfied.

Please give details of why you consider the Wiltshire Site Allocations Plan Allocation Plan is not legally compliant or unsound

Overall Planning Policy

1 The Westbury Topic Paper of the Plan states that the number of dwellings in Bratton is 819. The actual number is 516 some 38% fewer than the number stated. The figure for Housing Completions 2006 – 2016 is stated as 20 whereas the reality is more like 8 so this figure too is grossly overstated. So the starting point for the plan is clearly wrong. These inaccurate numbers cast doubt on the other figures in the Plan.

2 The Core Strategy states
Development at Large and Small Villages will be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities.

This proposal satisfies none of these requirements

3 The Housing Needs survey identified a need for 8 properties yet the Plan proposes 40. So clearly the land is not being allocated to meet the needs of the Bratton community.

4 At para 2.15 of the Plan the following appears

Development (within large villages) limited to that needed to help meet the housing needs of settlements and improve housing opportunities, services and facilities

This proposal is contrary to this key core policy.

The over-development proposed at the site is urbanisation within a village context and totally inappropriate and is not aimed at meeting 'the housing needs of the settlement'.

5 Page 22 of the Core Strategy, para 4.15 states
At the settlements identified as villages, a limited level of development will be supported in

order to help retain the vitality of these communities. At Large Villages settlement boundaries are retained and development will predominantly take the form of small housing and employment sites within the settlement boundaries.....Small housing site are defined as sites involving fewer than 10 dwellings

This is not a small housing site of the type envisaged by the Core Strategy, rather a major proposal introduced without any discussion with the local community. This proposal is in breach of this strategic statement.

6 The Core Strategy statement continues
Relaxation of the boundaries will only be supported where it has been formally reviewed through a subsequent DPD or a community-led neighbourhood plan, which includes a review of the settlement boundary to identify new developable land to help meet the housing and employment needs of that community. In turn this could bring forward benefits to the local community such as improvements to the economy through the identification of land for employment purposes.

The Parish Council, elected in May, has committed itself to developing a neighbourhood plan and this surely is the proper vehicle for identifying the housing needs of the village rather than allowing them to be blighted by an unneeded development just to satisfy the need to find somewhere to put 40 houses to meet a theoretical Government target. The Parish Council response recorded in the Plan is no longer its position as it is clear from an analysis of the planning policy that significant residential development on this site is inappropriate.

6 In summary, it is clear that the allocation of Site 321 satisfies none of the requirements of the Core Strategy approved in 2015. The Council's Core Strategy confirms that developments of this nature are inappropriate in a village the size of Bratton. Dropping a development on an urban scale on the edge of the village is clearly insensitive to the village.

7 We have calculated that Site 321 is 12,529m². That is 313m²/property.
Manor Fields, the only other major housing development in the village, has an area of 26,057m². With its 66 houses, that's 395m²/property. Even at this density residents' car parking is a major problem.

If Manor Fields was built at 313m²/property it would be the equivalent of building 83 houses i.e. squeezing an additional 17 houses into the land, an additional 34 cars or more. This density of development is clearly unsuitable for a rural village.

8 The combined effect of these policies must mean that the level of development in a Large Village such as Bratton must be no greater than can fit within the village without causing it to impact on the wider hinterland of the area, in terms of needing jobs and relying on services and local shops. An allocation of approximately 40 houses is of a size suitable for placing at a Local Service Centre such as Market Lavington or a town such as Westbury rather than Bratton and the Core Strategy specifically states at paragraph 4.14 that Local Service Centres should *provide for local employment opportunities, improved community facilities and/or affordable housing*, and in the same manner paragraph 2.15 of the Plan stipulates that Local Service Centres should provide *modest levels of development to safeguard their role and deliver affordable housing*.

9 Nor is the Plan effective since there is no prospect of employment opportunities being

generated in the village to require such a significant development. Whilst we recognise national policy requires the Council to make appropriate housing allocations Site 321 does not meet wider Government priorities relating to the development of sustainable housing, reduction in transport and protection of the countryside.

Landscape policy

10 Turning now to landscape considerations the Core Strategy states that Policy C3 Special Landscape Areas (SLA) is a saved policy from the West Wiltshire District Plan. Site 321 is within the SLA. That Policy C3 states

The landscape character of SLAs will be conserved and enhanced and development will not be permitted which is considered to be detrimental to the high quality of these landscapes.

Proposals for development essential to the social and economic well-being of the rural communitywill be permitted having regard to other material planning considerations

This proposal is contrary to this policy statement as the housing proposed is not ‘essential’ to the well-being of the rural community of Bratton

11 Core Policy 51 is also relevant in this case not least owing to the designation of the area as SLA 13. This policy states

Development should protect, conserve and where possible enhance landscape character and must not have a harmful impact upon landscape character....Proposals should be informed by and sympathetic to the distinctive character areas identified in the relevant Landscape Character areas identified in the Landscape Character Assessment(s) and any other relevant assessments and studies.

The development proposed of 40 houses is in direct conflict with this policy.

12 The Core Strategy at 6.80 identifies the Wiltshire District Landscape Character Assessment. The key section of this assessment is section 4.0. These requirements relating to the Bratton and Edington Chalk Terrace state

The overall strategy for the area is to conserve the generally intact landscape and settlement pattern with small villages nestling at the bottom of the Chalk Downland...Specific management objectives are to

- *Seek to resist any development that would affect the open views across the terrace to the chalk uplands*
- *Conserve ... the existing field pattern*
- *Conserve the existing small scale settlement pattern and avoid larger developments that would be out of scale and character.*

This proposal is in direct conflict with this policy.

13 The Inherent Landscape Sensitivities for the area G2 (Westbury Greensand and Chalk Terrace) in which the proposed site lies are listed as

- *Surviving hedgerow network*
- *Open views to dramatic Chalk Downland Edge*
- *Open views to Westbury White Horse as a dramatic landscape feature*
- *Strong sense of tranquility throughout the character area*

Development of this site within that landscape is at odds with the requirements of this policy

14 The Specific Management Objectives for G2 are

- *Seek to resist any development that would affect the open views across the terrace to the chalk uplands*
- *Conserve open views to the Westbury White Horse as a distinctive landmark*
- *Conserve the existing sparse settlement pattern and avoid larger developments that would be out of scale and character within the existing situation*

15 The proposal, therefore to develop this lowland landscape has a potential detrimental impact on this important Chalkland Edge landscape. To screen the development with trees shows a lack of understanding of the landscapes in this area.

Sustainability Appraisal

16 A Sustainability Appraisal is an obligatory part of the development process and must be published when a Plan is made. This has been done in this case. However, the conclusions of the Appraisal in the consideration of Site 321 in Bratton should be subject to critical examination:

17 Objective 2 has an objective of ensuring efficient and effective use of land and the use of suitably located previously developed land and buildings. The land at Site 321 is agricultural land and is described as BMV (Best and Most Versatile) Land. No part of the land is previously used land. The land is part of a Special Landscape Area. Yet the scoring in the answer is one negative, on the basis that there is a minor adverse effect and mitigation measures are readily available. On any reasonable interpretation the loss of the best form of land with a site which has no brownfield land at all must rank an higher adverse rating than a single negative. The mitigation measure is to increase the number of houses from the number originally designated as the appropriate amount, but again if the appropriate number of houses at a site is 32 increasing it by 25% again to make 40 houses is unreasonable and results in over development. It disregards all planning policy as to how many houses should be located at Bratton as a Large Village. It renders any arguments about needs for the village and the community irrelevant. It is increased without any regard to the local infrastructure, medical care, transport, road safety and road capacity and the capacity of the site to provide sufficient parking for residents and friends. It ignores the capacity of the village to improve employment opportunities.

18 Objective 12 relates to employment with an objective of ensuring adequate provision of high quality employment land and diverse opportunities to meet the needs of local businesses and a changing work force. The answer is a single positive. Yet in a case where no employment land is being provided at all it seems unreasonable to give a positive answer at all, rather a negative should be given.

19 Objective 8 relates to the provision of housing: ensuring everyone with the opportunity to live in good quality, affordable housing and ensure an appropriate mix of dwelling sizes,

types and tenures. This is answered with a triple positive. No other objective is answered with a triple sign, apart from this. All are answered in the negative except Objectives 8, 11 and 12. In terms of the needs of the village this triple answer may be unreasonable. The housing will be dense as approximately 40 will be fitted on the site. The presumption used is 30 houses per hectare with only two storey houses maximum. Housing in Bratton is expensive and the same housing in Westbury would provide greater affordability for a wider band of private purchasers. The affordable housing will be available for all residents in the region and not necessarily the children of residents in Bratton or the local area or others with a local need.

20 Likewise with Objective 11 on encouraging a vibrant and diversified economy, two positives have been given to this objective.

21 Objective 9 on the aim to reduce poverty and deprivation and to promote more inclusive and self-contained communities scores a single negative. Perhaps a double negative would be more appropriate considering the location and infrastructure of the village.

Landscape assessment

22 At Stage 4a of the Process a Landscape Assessment was carried out.

23 This Field Study highlights the two Public Footpaths running over the site. The Landscape character is described as “Pleasant”. This is understated in the Council’s opinion.

24 The remoteness and tranquillity judgement is given as “Peaceful”, but this is not correct. The B3098 although a B road is the main road leading through from Westbury to the east to West Lavington and on to Pewsey, Devizes and south to Salisbury and Andover. Much traffic passing from the Westbury direction and travelling to Devizes, Calne and Melksham use the B3098 from Westbury to Bratton to cut north and avoid the roundabout and delays at Yarnbrook. Statistical evidence is not available on this. The assessment states

The B3098 Westbury Road does not appear to be a particularly busy road and the landscape at the western edge has an exposed and remote feel. Overall the site and immediate landscape context is peaceful.

This is not the view of residents who have to drive out on to the road or use the road at its narrow points.

25 As long ago as 2007 in the West Wiltshire District Council Landscape Character Assessment referred to above in the section for the Bratton & Edington Greensand and Chalk Terrace, it was noted as a *Key Landscape Change* there was *Increasing commuter traffic along the B3098.*

I trust the above satisfies the requirements of the questions demonstrating why the Council question the legality and soundness of the Plan and why it considers it to be improperly prepared, unjustified, ineffective and not in accordance with national policy.

The next question which we will para-phrase states

Please set you what changes you consider it necessary to make...

To remedy this the review must take into consideration a wide range of national policies and Wiltshire Council's own Core Strategy. Better account must be taken of a wide range of other factors including

- Highways where the topic paper understates the busyness of the B3098
- The quality of the environment as the site sits in a Special Landscape Area
- The quality of the land as the site concerned consists of agricultural land of the highest quality

There is an alternative site within the settlement boundary in the ownership of the Parish Council. The Council has resolved to investigate its potential to meet the housing needs of the village.

We would propose that Wiltshire Council withdraw Site 321 from the Housing Allocations Plan and work with the Parish Council to develop the alternative site which we estimate could provide some 15 homes.

West Wiltshire District Council refused planning consent for a smaller development of 23 houses on Site 321 in 1994. Bratton has ensured that affordable housing has been built since then, particularly at Pear Tree Orchard, and it is smaller developments such as this, which are suitable for the size of the village.

Turning to the settlement boundary you can see from the recommendation above the Council, with one small addition do not wish to see the expansion of the settlement boundary. Particular concern was expressed at the southern extension of the village. Members felt that extending that boundary may encourage owners of large Victorian and Georgian houses to seek permission to develop their gardens for housing.

Oral examination

Finally the Council will wish to participate at the oral examination of the Plan. We consider it necessary to ensure that those sitting in judgement of the Plan have a full appreciation of our concerns relating to the reasoning contained in the Topic Paper which led to the inclusion of Site 321.

In closing we would like to re-iterate our concern about the nature of the consultation exercise. It was launched in July over the main holiday period, when most Parish and Town councils are in recess. This was compounded by a complex form for individuals to respond to, a portal on the internet which was difficult to access and a complete lack of contact with the community. This has led to widespread irritation in the village.

Yours sincerely

Jeff Ligo
Chair

Nicky Morris
Vice-chair

