

WILTSHIRE HOUSING SITE ALLOCATIONS PLAN (WHSAP) EXAMINATION

MATTER 4: SETTLEMENT BOUNDARIES

ON BEHALF OF: ROBERT HITCHINS LIMITED

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6. ISSUE 6: ARE THE PROPOSED SETTLEMENT BOUNDARIES JUSTIFIED, EFFECTIVE AND CONSISTENT WITH NATIONAL POLICY?

General questions

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

6.1.1 The settlement boundaries of the Principal Settlements, Market Towns, Local Service centres and Larger villages, were defined by the former District Local Plans and these were carried forward into the adopted Core Strategy. At the time the Inspector concluded, that as the boundaries had not been reviewed in the preparation of the Core Strategy, that *"it could not be argued with great strength that the settlement boundaries contained therein are up-to-date for the purpose of the CS plan period."*

6.1.2 Paragraph 36 of the Inspector's report notes that the Council conceded in Topic Paper 3 "Settlement Strategy" that the boundaries do not reflect current urban form and require review and updating and that a new boundary would be the ideal solution. To review boundaries the CS identifies community led planning as the vehicle to deliver the necessary updates. However, to avoid delay to adoption of the submitted CS, there would be scope to advance such a timely review through a subsequent development plan document. The Council proposes that such matters could be resolved adequately by the Sites DPD.

6.1.3 Consequently, settlement boundaries were to be reviewed as part of the Wiltshire Housing Site Allocations and Chippenham Site Allocations DPD in order to ensure that they are up-to-date and adequately reflect changes which have happened since they were first established. Boundaries could also be reviewed through a Neighbourhood Plan.

6.1.4 Paragraph 4.15 of the adopted Core Strategy states:

"these settlement boundaries will also be reviewed as part of the Housing Site Allocations DPD as set out in the council's Local Development Scheme, in order to ensure that they remain up to date and properly reflect building that has happened since they were first established." (my emphasis)

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

6.2.1 It is noted that an informal consultation took place with Parish and Town Councils in July – September 2014. The document set out the proposed methodology to review the existing boundaries and how Town and Parish Councils could inform the process. At that time this was not a wider public consultation.

6.2.2 The draft methodology included draft criterion to assist in guiding the settlement boundary review process.

"Areas which have been included are:

both built and extant planning permissions for residential and employment uses for areas which are physically/functionally related to the settlement (my emphasis).

existing and extant planning permissions for community facilities, such as religious buildings, schools and community halls which are considered to be physically/ functionally related to the settlement

site allocations identified in the development plan for both residential, community and employment uses which are physically/functionally related to the settlement."

6.2.3 It is noted that the Wiltshire Council draft settlement boundary methodology included *"Both built and extant planning permissions for residential and employment uses for areas which are physically/functionally related to the settlement."*

6.2.4 However, following consultation with the Parish and Town Councils in 2014 who disagreed that the settlement boundary should include allocations, development proposals and unimplemented planning permissions, the methodology was changed. Those who objected to the inclusion of sites with planning permission considered that many planning permissions never get built out and that the final built form may differ substantially from the original permission.

6.2.5 Only for those planning permissions that have commenced are included in the settlement boundary as they consider that there is much greater certainty.

6.2.6 The Topic Paper concluded:

“Therefore, the revised settlement boundary review methodology will include within the settlement boundary built or commenced planning permissions but exclude all unimplemented planning permissions. Nevertheless, it is recognised that settlement boundaries represent a snapshot in time. Unimplemented planning permissions subsequently built out can be included within a future review.”

- 6.2.7 This is not the case elsewhere and in our representations to the Proposed Submission Plan we gave examples of other authorities in the country where land with planning permission was included in a settlement boundary.
- 6.2.8 Furthermore, as Wiltshire Council relies on those planning permissions where development has yet to commence contributing to its overall housing land supply, it cannot be logical to exclude these sites from the settlement boundary. What message is this giving in terms of whether or not new planning permissions would be granted on these sites (which in policy terms would otherwise remain in an area where planning permission would not normally be granted)? The rationale provided by the Council for this approach as referred to above in paragraph 6.2.4 is weak and clearly unsound.
- 6.2.9 It is considered that settlement boundaries should be redrafted to include land with planning permission.
- 6.2.10 In respect of the examples we gave in our representations, development has commenced on the site at Westbury (east of the A350) and the site at Melksham (north of Sandridge Common), notwithstanding our comments above, even on the Council’s logic the settlement boundaries should now be drawn around these sites.

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

6.3.1 Whilst PC119 changes to the date when settlement boundaries should be updated to take account of implemented planning permissions, this had not been reflected in practice. The changes to paragraph 6.3 enable implemented planning permissions to be taken into account up to 2017.

6.3.2 However, no changes have been made to reflect the planning permission at Melksham, Westbury and Calne, in particular at Calne there appears to be an inconsistent approach.

6.3.3 The revised settlement boundaries proposed for Melksham, Westbury and Calne are not up-to-date and do not reflect recent planning permissions to RHL references 15/12454, 14/09262/OUT, 14/11179/OUT land at Prince Charles Drive, Calne respectively and also land at Low Lane Calne LPA reference 17/00679/OUT).

6.3.4 The settlement boundary of Melksham should be revised to reflect planning permission 15/12454 land to the north of Sandridge Common, Sandridge Road, Melksham, where development has started.

6.3.5 Likewise the settlement boundary of Westbury should be revised to reflect planning permission 14/09262 which was granted on appeal in July 2016 (300 dwellings, land north of Bitham Park, Trowbridge Road, Westbury) which has started. It is noted that the proposed new settlement boundary includes land to the west of Trowbridge Road which was granted permission and is under construction (220 dwellings 13/03568), but not land to the east of Trowbridge Road.

6.3.6 It is noted that the settlement boundary is proposed to be altered to reflect earlier planning permissions at Calne, namely land off Sandpit Road and land south of Abberd Lane, which have been built and under construction. Development on land off Prince Charles Drive (14/11179 for 130 dwellings) has now started and a start at land at Low Lane Calne (17/00679 for 165 dwellings) is imminent, this is not reflected in the changes to the settlement boundary. It is considered that the WHSAP should acknowledge the 'made' Calne Neighbourhood Plan allocation and include the land within the settlement boundary.

- 6.3.7 The issue is what harm would there be to the settlement strategy of updating the settlement boundary to reflect the recent planning permissions in addition to those under construction. These sites are after all considered against the housing supply and are consistent with the settlement strategy and are in some cases under construction.
- 6.3.8 It is considered that the settlement boundaries should be amended to reflect allocations and sites with planning permissions.

Specific settlements

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

6.4.1 Pegasus has no further comments, please see response to question 6.3.