Working towards a core strategy for Wiltshire

Wiltshire Core Strategy

Report on consultation
14 April – 27 May 2014

June 2014
1. **Introduction and Background**

1.1. The Wiltshire Core Strategy will, once adopted, provide part of the planning policy framework for Wiltshire. It was submitted to the Secretary of State on 10 July 2012 for the purpose of initiating the independent examination in public. Public hearing sessions on the ‘soundness’ and legality of the Plan took place between 7 May and 19 July 2013.

1.2. Following the hearing sessions Wiltshire Council (‘the council’) published a Schedule of Proposed Modifications (August 2013) for a six week consultation period from Tuesday 27 August to Wednesday 9 October 2013. The consultation gave all interested parties the opportunity to comment on those changes to the Core Strategy proposed by the council, arising from the Examination in Public process (EXAM 56). In response to the consultation comments the council suggested some additional changes to the Inspector and some further changes (EXAM 73 and EXAM 74).

1.3. The Inspector wrote to the council in December 2013 with his 10th procedural letter requesting the council’s response on a number of matters relating to: Housing; Affordable Housing; Gypsy and Travellers; Chippenham and Strategic Allocations; Settlement Boundaries; and Retail Frontages - Town Centre Boundaries.

1.4. The council considered all the matters raised by the Inspector and published a Schedule of Proposed Modifications that provided changes to the plan in response to these matters for public consultation. This incorporated EXAM 73 and EXAM 74 into one consultation document, ‘Schedule of Proposed Modifications April 2014’ EXAM 101. The following supporting documentation was also published:

- Wiltshire Local Development Scheme (January 2014) (EXAM78B)
- Wiltshire Core Strategy Addendum to Topic Paper 15 Housing Requirements Technical Paper (February 2014) (EXAM 84)
- Housing Land Supply Statement (February 2014) (EXAM 91)
- Wiltshire Core Strategy Addendum to Topic Paper 16 Gypsies and Travellers (February 2014) (EXAM 87)
- Wiltshire Core Strategy Viability Study (February 2014) (EXAM 85)
- Wiltshire Core Strategy Affordable Housing (Core Policy 43) Paper- Implications of Viability Review (February 2014) (EXAM 86)
- Wiltshire Core Strategy Sustainability Appraisal Addendum (April 2014) (EXAM 99)
- Wiltshire Core Strategy Habitat Regulations Assessment Update (April 2014) (EXAM 89A)

1.5. Comments were also invited on the updated Sustainability Appraisal (SA) and Habitats Regulations Assessment (HRA).

1.6. In addition, the Inspector asked the council to consult on two further areas.

   a. Main modifications that he considered necessary to ensure the Core Strategy is sound. These relate to:
      - Core Policy 42 ‘Standalone Renewable Energy Installations’ and its supporting text;
      - Core Policy 48 ‘Supporting Rural Life’; and
      - The replacement of ‘Saved’ Policy T1a ‘Westbury Bypass Package’.

      The Inspector’s explanation and context for these main modifications are set out in his letter of 7 April 2014 (Inspector’s 14th Procedural Letter – EXAM97).

   b. The implications of the National Planning Policy Guidance for the Wiltshire Core Strategy.
1.7. Consequently comments were invited during the 6 week consultation period between Monday 14 April 2014 and Tuesday 27 May 2014 inclusive. To confirm this invited comments on:

- The Schedule of Proposed Modifications (including Sustainability Appraisal and Habitats Regulation Assessment updates) incorporating EXAM 73 and EXAM 74 April 2014;
- Inspector’s Proposed Modifications April 2014; and
- Implications of National Planning Practice Guidance.

2. Consultation Methodology

2.1. Comments were invited during the 6 week consultation period between Monday 14 April 2014 and Tuesday 27 May 2014 inclusive. All parties who had previously made representations throughout the Wiltshire Core Strategy preparation process or had asked to be kept informed on the progress of the Wiltshire Core Strategy were written to directly with all statutory consultees. In addition public notices were placed within local newspapers across the County. All consultation documents were available on the council’s website and respondents were able to respond directly via the council’s consultation portal as well as via email or letter.

3. Consultation Responses

3.1. This document provides an overview of the responses and sets a number of further changes that will help provide clarity.

3.2. There are five appendices to this document that include each representation and an officer response. The schedules of comments are broken down into the five areas that were being consulted upon:

- Appendix A - The Schedule of Proposed Modifications (including Sustainability Appraisal and Habitats Regulation Assessment updates) incorporating EXAM 73 and EXAM 74 April 2014, listed in modification order. Further broken down into:
  - Appendix Ai - Chapter 1-4 (Introduction - Spatial Portrait - Spatial Vision - Spatial Strategy) (TPL1 – TPL13)
  - Appendix Aii - Chapter 5 (Community Area Strategies) (TPL14 – TPL59)
  - Appendix Aiii - Chapter 6 (Spatial Objectives) (TPL60 – TPL79)
  - Appendix Aiv – Appendices (TPL80 – TPL88)
  - Appendix Av - Modifications from Examination Hearings (EXAM 73 and 74)
- Appendix B - Inspector’s Proposed Modifications April 2014; Listed in modification order.
- Appendix C - Implications of National Planning Practice Guidance. Listed in representation ID order.
- Appendix D - Sustainability Appraisal. Listed in representation ID order.
- Appendix E – Habitats Regulations Assessment. Listed in representation ID order.

4. Overview of consultation

4.1. This section of the report sets out an overview of the comments received in response to the consultation on the council’s proposed modifications, inspectors proposed modifications, Sustainability Appraisal, Habitat Regulations Assessment and implications of the National Planning Policy Guidance (NPPG). Overall 698 comments were received from 344 parties. The majority of comments were on the schedule of proposed modifications with a substantial number of representations also received on the Inspectors main modifications. There were just a handful of comments on the implications of the National Planning Practice Guidance, Sustainability Appraisal and Habitats Regulations Assessment.
4.2. With respect to the schedule of proposed modifications the majority of comments were received on Chapter 1-4. These proposed changes introduced the flexible approach to housing delivery, the Chippenham Sites Allocations DPD’s, the Housing Sites Allocations DPD, confirmed when the settlement boundaries would be reviewed, increased the housing numbers to 42,000 across Wiltshire, disaggregated these houses across the community areas of Wiltshire and removed strategic allocations at Chippenham. A number of comments were also received on the Community Area Strategies. However, these changes predominantly translated the amendments within chapter 1-4 of the Wiltshire Core Strategy to this later part of the plan. A number of comments (47) were also received on Section 6 of the Core Strategy. The majority of these comments were associated with the amendments to the affordable housing policy. A small amount of responses were also received on those amendments proposed as a result of the consultation on the hearing session proposed changes.

4.3. With respect to the Inspectors proposed changes the majority of amendments were in association with Modification B. This removed the separation distances to Core Policy 42 (Standalone Renewable Energy Installations). The majority of the respondents were against the removal of these separation distances. 71 parties responded to and supported modification D. This removes the Westbury Bypass package from the West Wiltshire District Local Plan. A handful of respondents commented on Modification C that makes amendments to Core Policy 48 Supporting Rural life, evenly split between support and objections.
5. **Key Issues raised**

5.1. The key issues raised in the representations received are summarised below. The list is not exclusive and full details of all representations are provided in the appendices. In addition, all comments will be available to view on the online consultation portal.

5.2. **Summary of issues raised on Core Policy 1 to 3**
- The overall housing number of 42,000 is not objectively assessed
- Support for increased housing numbers
- The plan period should be extended to cover at least 15 years; housing requirements should be increased accordingly
- Development Plan Documents (DPDs) and neighbourhood plans cannot be relied upon to deliver additional housing
- The council does not maintain a 5 year housing supply and the settlement boundaries are out of date
- Housing figures should be minimum’s
- Some strategic sites in the Wiltshire Core Strategy are not deliverable
- Chippenham sites should not be included within the 5 year land supply figures
- The Council should be dealing with any historic undersupply of housing during the first 5 years of the plan
- The Council cannot maintain a 5 year housing supply especially with higher housing numbers
- Housing to meet the needs of Chippenham should not be built within Bremhill Parish to the East of Chippenham
- The West of Swindon requirement (900 homes) should be in addition to the 42,000 homes required to meet the needs of Wiltshire’s Housing Market Areas
- The objectively assessed need is 55,680 as evidenced in the GVA Strategic Housing Market Assessment submitted as part of a representation
- The housing requirement for use in the five year land supply should be the objectively assessed need of 44,000 homes
- The council should use the Sedgefield approach for assessment housing land supply
- There has been a persistent undersupply of housing in the South Wiltshire HMA
- There has been a persistent undersupply of housing in the East, North and West Wiltshire.
- There are no adequate grounds advanced for departing materially from the distribution proposed in the Regional Spatial Strategy Revisions approved by the Secretary of State of the Wiltshire total of 44,400 dwellings

5.3. **Community Area Strategies (Core Policies 4 to 33)**
- Question whether both increased housing numbers and Army rebasing housing can be accommodated within the Amesbury area
- Support for increased housing numbers in Calne
- Support for increased housing numbers in Bradford on Avon
- Concern over the position Chippenham may be left in whilst the Chippenham Site Allocations DPD is being prepared
- Disappointed at the deletion of the strategic allocations at Chippenham
- Identify strategic sites for Chippenham as part of Wiltshire Core Strategy not the Chippenham Site Allocations DPD
- The criteria in Core Policy 10 should not be used to identify strategic sites for Chippenham
- Support for the broad strategic areas of growth around Chippenham
- The railway line at Chippenham has previously been clearly identified by Planning Inspectors as forming the natural boundary of the town
- The areas A-E on the Chippenham diagram are not properly defined
- Object to the proposal to build on the land to the east of Chippenham outlined in the core strategy
- The words "at least" in front of 4,510 homes is open ended and should be a fixed number as is the case for all the other towns in Wiltshire.
- Chippenham - Decisions on where the sites should be allocated should be made on social, economic and environmental factors that make up sustainable development as set out in the National Planning Policy Framework
- Support the proposed increase in housing numbers for the Corsham Community Area
- The level of housing at Devizes is too great
- Further Housing at Malmesbury should be identified
- The overall housing numbers at Melksham should be increased
- The housing figures for the Melksham community area remainder should be reduced to those within the submitted core strategy
- The overall housing numbers at Pewsey should be increased
- Support for the increased allocation for the Royal Wootton Bassett and Cricklade Community Area.
- The housing provision for the South Wiltshire HMA be increased to at least 12,500 dwellings;
- Concern over the proposed increase in housing from 555 to 615 in the southern Wiltshire area due to the proximity to the National Park
- Strongly object to the allocation of any additional housing to Hilperton
- The Overall housing numbers at Warminster should be increased
- The overall housing numbers at Salisbury should be increased

5.4. **Core Policies 34 to 69**

- Support the inspector's recommendation to remove all references to separation distances from Core Policy 42
- There is no evidence for separation distances in Core Policy 42
- Objection to the inspectors recommendation to remove references to separation distances
- 40% affordable housing is still not justified by any evidence base, viability or need
- A viability clause is required in the policy for when affordable housing cannot be delivered
- A financial viability assessment needs to be undertaken to underpin the policy and the figure is revised downwards
- Disappointing that Devizes has only been allocated 30% affordable housing.
- Strategy Viability Study (Exam 85) which overestimates the viability of smaller sites of 4 to 70 residential dwellings
- Support for the two separate affordable housing zones
- The percentage figures are very high. 30% should be the maximum for previously developed land
• A full breakdown of build costs need to be provided as part of the Viability Stud. This should include a differential for flats and houses
• We can see no evidence that HDH proposed to test future market scenarios and sensitivity test alternative cost and value assumptions through time
• A 5 unit affordable housing threshold is too low, 10 units is a more appropriate minimum threshold
• The proposed zoning is a very blunt tool and does not contain sufficient flexibility to respond to site specific circumstances
• The continued use of the words "at least 40%" or "at least 30%" affordable housing is not consistent with the remainder of the policy, which acknowledges that affordable housing can vary on site-by-site basis, taking into account evidence of local need, mix and viability
• There should be parity between Gypsy and Travellers and the settled community in respect of planning applications and the Core Strategy must reflect that parity
• Supports the proposed modification to Core Policy 51 Page 196

5.5. Comments on Sustainability Appraisal and Habitats Regulations Assessment
Please see Appendix D and E for detail of comments on the Sustainability Appraisal and Habitats Regulations Assessment.

5.6. Comments received on the implications of the National Planning Policy Guidance
• Given that the NPPG introduced additional guidance on preparing an Objectively Assessed Need (OAN) for housing and employment needs for an area and the fact that the consideration of market signals has had a significant impact on the calculation of the OAN for Wiltshire it is essential that the Inspector considers the impact of the NPPG on the emerging Wiltshire Core Strategy
• Wiltshire Council’s use of the Liverpool approach contradicts the NPPG, paragraph reference ID 3-035-20140306, which states that “Local planning authorities should aim to deal with any undersupply within the first 5 years of the plan period where possible”. It also contradicts decisions made by Inspectors both in relation to planning applications and to Local Plan examinations
• Results of the CIL Viability Study indicate that in many instances the affordable housing targets proposed by draft Policy Core 43 are not viable and that the Council will need to adopt lower affordable housing targets to ensure that their policy meets the requirements of the NPPG

6. Further proposed changes

6.1. Some further changes are proposed to ensure clarification in the plan.

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<tr>
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<td>598 TPL25 Core Policy 10</td>
<td>Criterion 1 - The wording of the criterion would benefit from a clarification making it clear the scope of an area will be assessed having regard to its ability to ensure delivery of premises and/or land for employment development. The mixed use schemes at Chippenham should be able to make available land for future employment use, particularly where there is no end user, rather than be required to deliver premises that, may or may not, meet the specification/requirements of an unknown future user.</td>
<td>Core Policy 10 - Criterion 1 of TPL25 could be improved for clarification that recognises the ways the development industry may provide for new employment to serve the town.” The criterion should read: ‘The scope for the area to ensure the delivery of premises and/or land for employment development reflecting the priority to support local economic growth and settlement resilience’.</td>
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<td>335 371 TPL10</td>
<td>Due to the bottlenecks of traffic already experienced at peak times on the A4 in Calne and Lyneham the new sites</td>
<td>Criterion 3 of proposed modifications to Core Policy 10 (TPL/25) could be improved to protect against the traffic</td>
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<td>TPL25 Core Policy 10</td>
<td>outside of the Chippenham Development Plan will increase the number of vehicles using ‘rat runs’ already experienced in Bremhill Parish. This will be further exacerbated as and when the Lyneham Technical College becomes operative. A new ring road on the East side of Chippenham will not overcome the delays experienced at these bottlenecks- it will make them worse. The increased number of vehicle drivers from new developments seeking to escape the delays could try to use the narrow lanes through Bremhill Parish causing further risk to residents whose houses are adjacent to the lanes without pavements, and further safety issues to walkers, cyclists and horse-riders.</td>
<td>concerns raised, which are reasonable planning considerations and would help clarify the policy. This could be redrafted as follows: “Improves local traffic. Offers wider transport benefits for the existing community, has safe and convenient access to the local and primary road network and is capable of redressing traffic transport impacts, including impacts affecting the attractiveness of the town centre.” In addition, criterion 4 should be extended to refer to employment also – add “and employment” to the end of the criterion</td>
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<td>240 265 TPL25 Core Policy 10</td>
<td>Criteria 5 of TPL25 (CP10) should be expanded to include ENJOYMENT (eg environmental quality of the open spaces around Chippenham and the surrounding villages). Access could be improved but enjoyment ruined by traffic and buildings.</td>
<td>Criterion 5 of proposed modifications to Core Policy 10 (TPL/25) would benefit from explicit reference to the ‘enjoyment’ the countryside not just access and this should be added to the suggested wording. Criterion 5 could be redrafted as follows: ‘Has acceptable landscape impact upon the countryside and the settings to Chippenham and surrounding settlements, improves biodiversity and access and enjoyment to the countryside’</td>
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<td>144 RTR06 Core Policy 21</td>
<td>We object to the proposed amendment to Core Policy 21 as it includes reference to a “department store” which may or may not be part of the scheme for the Maltings. The policy is therefore too prescriptive and should refer to an anchor store, rather specifying a department store. The Council have amended this in the schedule for the Maltings, by deleting reference to a department store, and the policy is therefore inconsistent with the schedule and the Council’s amendments to it in this respect</td>
<td>Core Policy 21 - Amend the last sentence to the policy to ensure consistency with amendments made to the development template. The last sentence of the policy should read: ‘This open streetscape will connect the prime retail units and will include retail by a department store, residential and leisure uses.’</td>
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<td>258 TPL65 Para 6.43</td>
<td>The policies map at Appendix B, Dilton Marsh is shown as in a 40% zone, but in the supporting text at [6.43a] it is shown as in a 30% zone.</td>
<td>Amend Affordable Housing Zones map to reflect text found at paragraph 4.43a.</td>
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<td>143 Para 6.38 General</td>
<td>Further to the response below on behalf of this AONB, I have had a potential grammatical slip in relation to Core Strategy 42, page 175, para 6.38 drawn to my attention. The reference to ‘setting’ clearly applies to AONBs and the joint Stonehenge and Avebury World Heritage site. The final two words of the sentence should, therefore, read ‘their settings.’ This AONB recommends that small grammatical slip is corrected to avoid any potential for misunderstanding. Wiltshire Council has, after all, already adopted the relevance of the AONB setting in relation to renewable energy in the adopted AONB Management Plan.</td>
<td>Paragraph 6.38, sentence 1 be amended in order to correct grammatical error. Paragraph 6.38 The development of most standalone renewable energy installations within Wiltshire will require careful consideration due to their potential visual and landscape impacts, especially in designated or sensitive landscapes, including AONB’s and the Stonehenge and Avebury World Heritage Site and their settings.</td>
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<td>186, 642 and 680 RTR21 Para 6.137</td>
<td>The paragraph would benefit from some minor amendments to clarify text agreed at the EiP.</td>
<td>6.137 Wilshire’s World Heritage Site (WHS) is a designated heritage asset of the higher international and national significance. The United Kingdom, as a signatory to the Convention Concerning the Protection of the World Cultural and Natural Heritage (UNESCO, 1972) is obliged to protect, conserve, present and transmit to future generations its WHSs which, because of their exceptional qualities are considered to be of Outstanding Universal Value (OUV) of the World Heritage Site and ensure that it is transmitted to future generations’. The obligations should therefore be given precedence in decisions concerning development management in the WHS. World Heritage status offers the potential of considerable social and economic gains for Wilshire in areas such as sustainable tourism, however this will require careful and sensitive management in order to protect the Site and sustain its OUV.</td>
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<td>643 and 695 CR193</td>
<td>The paragraph would benefit from some minor amendments to clarify the up to date position.</td>
<td>6.138 The Stonehenge, Avebury and Associated Sites World Heritage Site was inscribed on the UNESCO World Heritage list for its OUV. Since that time, a Statement of Significance (see Stonehenge Management Plan 2009, pp26-27) and a draft Statement of OUV for the WHS have been drawn up agreed by UNESCO in 2013. The World Heritage Site requires protection and where appropriate enhancement in order</td>
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<td>to sustain its OUV. Not all aspects of the Site contribute to OUV and the UNESCO Statement of significance and OUV as well as the World Heritage Site Plans for Stonehenge and Avebury are a critical resource in reaching decisions relating to the significance of its elements, for identification of the attributes of OUV as well as other important aspects of the WHS, and for reaching decisions on the effective protection and management of the Site.</td>
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