Responses to Question 21 –
SO4: to help build resilient communities – Resilient Communities – Core Policy 32
Please note that this document should be read in conjunction with the Consultation Statement January 2012 Report and the User Guide for the Record of Comments.

<table>
<thead>
<tr>
<th>No.</th>
<th>Comments</th>
<th>Cross Reference</th>
<th>Officer Comments</th>
<th>Issue</th>
</tr>
</thead>
<tbody>
<tr>
<td>114</td>
<td>Core Policy 32 I suspect that the requirement for a very expensive marketing plan will result in buildings being kept empty for longer than today. Are the surrounding authorities going to adopt similar policies? If not, developers may go elsewhere.</td>
<td></td>
<td>The requirement for a marketing exercise is standard practice in many authorities, and has been successful in south Wiltshire. If we do not put safeguards in place, these vital community facilities will be easily lost to other uses, to the detriment of the local community.</td>
<td>Marketing exercises</td>
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<td>428</td>
<td>Core Policy 32 I fully support this policy. Action must be taken to discourage (say) the deliberate running-down of a public house in order to convert it, and its land, to residential use. I am pleased to see that there is no mention of a community facility having to be the last one in a village/parish to be afforded the protection of this policy.</td>
<td></td>
<td>Support on this policy is welcomed</td>
<td>Support</td>
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<td>476</td>
<td>Core Policy 32 – Protection of Services and Community Facilities: This has the Parish Council's strong support as it is felt that community facilities must be protected.</td>
<td></td>
<td>Support on this policy is welcomed</td>
<td>Support</td>
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<td>661</td>
<td>i Replace 6 with 12. Six months is too short a time to test the marketing.</td>
<td></td>
<td>Criterion i) states 'at least 6 months' and depending on the type of premises and the market conditions at the time, this could be extended for a longer period.</td>
<td>Marketing exercises</td>
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<td>786</td>
<td>Resilience yet again! I don't even know what this objective means. Swamping west Wiltshire with new population, encouraging activity and existing population out of town centres, ruining the immediate landscape environment of the existing towns, tying Wiltshire to the unsustainable future of increasing car-dependence as the petrol runs out, increasing the social exclusion of those who no longer have access to public transport...How does any of this build resilient communities? Or do you just mean resigned, apathetic and defeated communities?</td>
<td>SO3 &amp; SO8</td>
<td>Comments noted</td>
<td>Transport &amp; Housing</td>
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<td>887</td>
<td>Core Policy 32 Protection of Services and Community Facilities Wiltshire has at least 12 theatres and performing arts spaces in the County and The Theatres Trust wishes to be assured that Core Strategy policies are robust enough to include specific guidance on protecting and encouraging our existing arts and cultural provision. In view of the wording of Core Policy 3 regarding Placeshaping Infrastructure, we suggest that the title of Core Policy 32 is amended to 'Protection of Services, Cultural and Community Facilities' for continuity and clarity. Paragraph 6.4.8 gives examples of social and cultural activities but does not include going to the theatre which must be a popular pastime for residents and visitors in Wiltshire given the demographic profile of your communities and the number of performance spaces in the County. Also, so that guidelines are clear and consistent, we recommend a description for the term 'community facilities' is included in the Glossary and suggest: community facilities provide for the health, welfare, social, educational, spiritual, recreational, leisure and cultural needs of the community.</td>
<td></td>
<td>The policy and text as written does not include reference to cultural facilities, and this could be included within the text to ensure that these cultural facilities are also subject to the same tests. The suggestion of a glossary with a definition of what community facilities are is also a good suggestion.</td>
<td>Cultural facilities</td>
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<td>935</td>
<td>Protection of Services and Community facilities - Core Policy 32 We support this principal, but the policy is stringent and should be flexible to ensure that sites do not lay redundant for years. A pragmatic approach is likely to be required, for example a community use could be provided on part of the site which could be funded by residential development on the remainder. In this scenario it is likely that there would also be S106 contributions for other services.</td>
<td></td>
<td>Support on this policy is welcomed. It is not the policies intention that sites lay redundant for years, and it stopped that by marketing the site for an agreed period will either demonstrate that the site is suitable for another use and that there is a buyer prepared to purchase, or that it is not suitable or viable for another use, in which case the use could be changed for another, ensuring that the building is used.</td>
<td>Support</td>
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<td>Page</td>
<td>The notes below are explored further in our main submission available as a separate document. The Showell Protection Group believes that it is not just villages that need a cohesive central focus. The same is true for larger settlements. In the case of Chippenham major effort should be put into creating a vibrant town centre with a wide range of leisure, arts and social activities. Anything that detracts from this, such as the large scale housing/industrial development to the south west of the town should be discouraged. The town centre should be the ‘heart’ of the town and hearts are centrally placed.</td>
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<td>970</td>
<td>SO6</td>
<td>Comments noted. It is current Government policy (PPS4) to support ‘town centres’ as the heart, and this is supported within strategic objectives, 1 and</td>
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<td>Town Centres</td>
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<td></td>
<td>Wiltshire Core Strategy, June 2011. Draft Topic paper 3: Settlement strategy, Appendices. I wish to comment, as a resident of Keevil, on inaccuracies in the above mentioned document which will have been used in classifying Keevil as a large village. 1. There is no shop 2. There is no post office as such, and the service offered is in terms of opening hours minimal. An annex of the village hall is used as a post office for 4 hours each Tuesday afternoon. 3. The number of jobs in the village is recorded as 103. In view of the fact that employment is of an agricultural nature, this figure is much too high. 4. There is no community minibus. Although Keevil is not in the flood zone, as defined by the Melksham Community Area map showing Selected Restraints (see page 90 of the main consultation document), it should be noted that it has had serious flooding problems over many years. The council had been involved in addressing this matter in the recent past, but it remains to be seen if the remedial actions taken have resolved the issue. May I respectfully request that inaccuracies are corrected and qualifying notes added where the impressions given do not reflect the real situations. This should then result in further consideration of Keevil’s current classification as a large village.</td>
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<td>1192</td>
<td>CP1</td>
<td>Comments noted. This information will be used to update the assessment of Keevil and the appropriate designation of Keevil will be included in the next draft.</td>
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<td>Keevil</td>
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<td>Strategic Objective 4 To help build resilient communities Core Policy 32 Protection of services and community facilities. The AONB is particularly supportive of this approach and has made numerous efforts to retain shops and post offices within the villages of the AONB. If the scope of community facilities is not to be set down in the actual policy statement itself then the AONB would recommend elaborating on the facilities in the supporting statements.</td>
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<td>1462</td>
<td>Support</td>
<td>Support on this policy is welcomed, and a glossary could be included stating the range of facilities that the policy will cover.</td>
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<td>Support</td>
<td>Support on this policy is welcomed.</td>
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<td>1476</td>
<td>CORE POLICY 32 I Suggest insert 12 months and delete six months which it is felt to be too short a period of time to test Marketing.</td>
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<td>1513</td>
<td>Marketing exercise</td>
<td>Criterion i) states ‘at least 6 months’ and depending on the type of premises and the market conditions at the time, this could be extended for a longer period.</td>
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<td>1568</td>
<td>New facilities</td>
<td>The lack of infrastructure provision in some areas has been noted, and Core Policy 3 on Infrastructure requires that all new development to provide for the necessary infrastructure arising, including open space.</td>
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<td>1725</td>
<td>CP3</td>
<td>At present, we are unable to collect maintenance sums for these facilities, but with the introduction of the Community Infrastructure Levy, this may change in the future.</td>
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<td>106 contributions</td>
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<td>1914</td>
<td>Q2122 Core Policies Wiltshire Core Strategy With regard to its general core policies, as we noted in Q 1, although the consultation document recognises that Wiltshire is a “largely rural area” (around half of the population living in towns and villages with fewer than 5000 people), rural issues are not addressed in a coherent or integrated way. Whilst we warmly welcome the positive policies for rural diversification and enterprise (Core Policy 25) we would wish to see these as a platform for more positive rural policies as a whole, with clearer links to rural policies on housing and services as part of a stronger vision for rural Wiltshire and the contribution it can make to the life and work of the county. This could be achieved for example by: • Relating the economic potential of rural areas (eg home working, recreation and tourism, green technology, etc) and its capacity to provide more jobs locally and reduce outward commuting and help make Wiltshire’s rural communities more sustainable. • The potential for more community-based services such as transport, village shops/pubs, community centres etc which could enhance the sustainability of smaller rural communities. • Where appropriate, modest increases in housing which would benefit from access to the jobs and services indicated above. • More radically, by exploring the potential for developing new or extended communities - such as eco-villages - which aim directly at providing affordable homes with local jobs and services in a sustainable way. We suggest that although the Draft Topic Paper 3 - Settlement Strategy, examines the current roles and functions of Wiltshire’s towns and villages in some depth, it fails to explore the potential for many rural communities to provide a more attractive and sustainable future for its residents. We would therefore ask that this issue be further considered and we would particularly welcome an opportunity to explore these ideas in more depth with the Council.</td>
<td>1966</td>
<td>Pettit Brothers Contracting Ltd opposes proposed Core Policy 32 as it is excessively general in its application; demonstrably inflexible; and fails to comply with National Policy by establishing appropriate criteria for the change of use from certain commercial/business uses (specifically Public Houses, Post Offices and Shops) to other uses. Curiously, the few abovementioned specified uses are specifically identified as ‘Services and Community Facilities’ which are liable to protection, but other uses which are equally or more crucial to the day to day lives of the community are not. As an example, a wide range of Council and Government funded/run services, such as area offices, libraries, sports facilities, cultural facilities, health facilities etc are more vital to local communities and should also be identified as protected in planning policy. The proposed selective approach is considered invalid and unjustifiable. In its present form the policy must be deleted as it would ne unable to achieve the stated aims. The Policy is excessively inflexible as it applies irrespective of the existing nature of the settlement or the range of facilities available therein. The policy is excessively bureaucratic as, read literally, it effectively requires every specified change of use to be appraised for lack of viability in spite of circumstances (eg. although the larger settlements in Wiltshire will already benefit from a wide range of services). It is therefore suggested that as a minimum, the Policy should be changed so that it only applies: 1) When it is demonstrated that there is no long term need for the facility (eg. because the need is already satisfied by other adjacent facilities); 2) Where suitable replacement facilities are provided; 3) At locations in the countryside and smaller villages where the Council evidence base has already identified that a limited range of services and facilities are available to sustain communities. The proposed policy does not comply with National Policy. Rather than requiring an arbitrary viability appraisal, PPS4 - ‘Planning for Sustainable Economic Growth’ advises (para EC13.1) that when assessing planning applications affecting leisure uses including public houses in local centres and villages Local Planning Authorities should take into account the importance of the shop, leisure facility or service to the local community or the economic base of the area. The draft National Planning Policy Framework also specifies that restrictions of change of use shall only apply where a community’s day to day existence is compromised (paragraph 126) and requires a positive approach to otherwise be taken to retention of facilities. The Core Strategy should acknowledge more implicitly that planning policy could not, in itself, prevent an unsustainable business from permanent closure. Unjustifiable degrees of inflexibility to alternative uses will discourage small business growth, business ‘risk taking’ and inward investment at a time when government is seeking to restructure the economy to encourage such businesses. Other valid policy options do not appear to have been adequately considered in the SEA and therefore the proposed policy fails to be justified.</td>
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<td>2067</td>
<td>Paragraph 6.4.4 Support is given for the protection of services and community facilities and to encourage the development of rural services and facilities to ensure that rural settlements can still meet some of the day-to-day needs of the people who live in them. As noted at paragraph 6.4.7 too many community facilities such as village shops and pubs are lost too easily in Wiltshire. Thus, there is a need for a more thorough policy to address this issue and the negative impact of services/community facilities being – especially in rural areas. Rather than having a policy, therefore that is focussed on protecting against the loss of rural services and community facilities, a more proactive overall approach should be taken – for the vitality of rural communities – both individual and groups of villages – that are able to provide combined opportunities for new employment, housing and sustained community facilities that will prosper as part of a thriving rural community area.</td>
<td>Support on this policy is welcomed</td>
<td>Support</td>
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<td>2091</td>
<td>Core Policy 32 Protection of services and community facilities. The AONB is particularly supportive of this approach and has made numerous efforts to retain shops and post offices within the villages of the AONB. If the scope of community facilities is not to be set down in the actual policy statement itself then the AONB would recommend elaborating on the facilities in the supporting statements.</td>
<td>Support on this policy is welcomed</td>
<td>Support</td>
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<td>2286</td>
<td>Core Policy 32 – Protection of Services and Community Facilities The Council will need to ensure that this policy does not over lap with the Community Right to Buy provisions in the emerging Localism Bill.</td>
<td>Comments noted.</td>
<td>Localism Bill</td>
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<td>2417</td>
<td>Core 32 – protection of services and community facilities (p139) It is important that where there is a need and it is viable, former community facilities are retained for community use. Several tests are proposed and it is important the community is given long enough to formulate alternative uses. But once this is exhausted it’s important that sites can be brought forward for development to avoid them being left derelict and causing blight for several years. Affordable housing should also be considered an acceptable form of community use once other community uses have been exhausted.</td>
<td>Support on this policy is welcomed</td>
<td>Support</td>
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<td>2587</td>
<td>Comments: Strategic Objective 4 - Build Resilient Communities It should be recognised that some settlements will significantly benefit from further growth to sustain them, help their economy and that of the wider rural hinterland as well as supporting local shops and services and stemming out-commuting. Careful consideration will also need to be given to the types of development that will be accommodated in some of the smaller towns and villages to help achieve self-containment.</td>
<td>Support on this policy is welcomed</td>
<td>Support</td>
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<td>2611</td>
<td>STRATEGIC OBJECTIVE 4 This is a laudable objective and should be in action now. Present indications show that there is little chance of the objective being achieved. In these circumstances the Core Strategy should explain how the objective will be achieved.</td>
<td>Support on this policy is welcomed</td>
<td>Support</td>
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<td>2806</td>
<td>Core Policy 32 refers to the protection of services and community facilities and although it is recognised that such services and facilities can be broad ranging by definition the supporting text would benefit from a list of potential services and facilities. For instance, does a petrol filling station (even if shut for many years) represent a facility to be safeguarded?</td>
<td>Support on this policy is welcomed, and a glossary could be included stating the range of facilities that the policy will cover</td>
<td>Support</td>
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We the undersigned organisations have studied Wiltshire Council's draft Core Strategy and have concluded that it does not represent a coherent plan for the future of West and North Wiltshire to 2026 and beyond. Last year we were led to believe that the abolition of regional allocations for building new homes in the county would allow us to decide how much development we wanted in Wiltshire and where we wanted it. Today we find that the massive housing estates and retail parks have not shrunk back from the green field sites where the developers would like to build them. Twenty thousand new homes and something like a square kilometre of industrial estates are planned for North and West Wiltshire by 2026 - homes and jobs for another 50,000 people. We question fundamentally whether this model of expansion can bring the economic growth the council expects, while also meeting the needs of existing communities in an area where transport, education and health services are already struggling to meet demand. Clearly, past planning policies have not worked, yet the Council's Core Strategy is proposing more of the same: More decline of town centres More characterless car-based suburbia More traffic congestion, noise and pollution in both towns and villages More damage to the natural environment and loss of agricultural land More overloaded services Rather than reproduce these outdated policies in the blueprint for the next 15 years, we ask the council to think again and give us: An overall reduction in the housing numbers it has proposed for West and North Wiltshire, seizing the opportunity offered by the scrapping of regional allocations and fulfilling the promise of a new 'localism' in planning policy; A more honest consultation that provides real data and maps on the traffic implications of proposed growth in our area; Much stronger policies to ensure that people will have real opportunities to switch from driving to walking, cycling and travelling by bus or train - a key objective of the Wiltshire Community Plan; A better and more informed appraisal of our real needs for new jobs and new homes; the relationship between these needs and the skills we want to develop and attract in coming years; a more direct way to meet the urgent need for affordable homes in towns and villages; The channeling of developer funds away from building more roads and towards developing and improving town centres, creating 'green infrastructure' and supporting better public transport; The clear prioritisation of Trowbridge and other town centres for office development to bring vitality back to central areas; Fewer new employment areas on the fringe of towns - less 'tin shed land' in the open countryside; support for rural employment, farm-based enterprises, local food and working villages; A sustainability appraisal that genuinely examines the environmental consequences of hot-housing Western Wiltshire, and looks at other options for development in the coming decades of climate change, peak oil, and shortages of food and water; A Core Strategy that is understandable to the ordinary person rather than hiding its objectives in planning jargon and evasive verbiage; The publication of accurate maps to show the proposed locations of housing and employment areas and the roads and other strategic infrastructure and services that the council is planning to provide for them. We consider that the present draft of the Wiltshire Core strategy is not fit for purpose. This letter has focused on North and West Wiltshire, where some of the most damaging effects of excessive growth would be felt, but the council's plans are causing widespread concern in East Wiltshire and South Wiltshire as well. We ask the Council to think again. Yours sincerely

George McDonic MBE, Past President of the Royal Town Planning Institute
On behalf of the following organisations: Wiltshire CPRE - George McDonic, Chairman CPRE West Wiltshire Group - Nigel Williams, Vice Chairman CPRE North Wiltshire Group - Anne Henshaw, Chair CPRE Kennet District Group - John Kirkman, Chair CPRE South Wiltshire Group - Peter Wicks, Chairman Dorset CPRE - Richard Nicholls, Chairman CPRE North Dorset Group - Stephen Howard, Chairman The Trust for Devizes - Edward East,Chairman Association of Kennet Passengers - Steve King, Chairman North Wiltshire Friends of the Earth - Stephen Eades, Chairman Chippenham Community Voice - Peter J Humphrey, Chair Showell Protection Group - Tony Peacock, Coordinator Climate Friendly Bradford-on-Avon - Richard Craft, Chairman Trowbridge Civic Society - Glyn Bridges, Chairman Campaign for a Better Trowbridge - Ken McCauley, Coordinator North Bradley Parish Council - Roger Evans, Chairman North Bradley Peace Memorial Trust - Pauline Baxter, Committee member/Funding Coordinator West Ashton Parish Council - Richard Covingtnon, Chairman Hilperton Parish Council - Ernie Clark, Chairman Westbury Bypass Alliance - Penny Stirling, Coordinator Campaign for Better Transport Bristol & Bath Travel to Work Area - Jenny Raggett, Coordinator The White Horse Alliance - Kate Le Grice Mack MBE, Chair A36/A350 Corridor Alliance - Chris Gillham, Coordinator Western Wiltshire Transport Concern - Andrew Nicolson, Coordinator South West Transport Network - David Rodgell, Chair M Dodd - Chairman, Great Hinton Parish Council

The Governments intention to abolish the RSS, has given the Council to look at the evidence used for the preparation of the RSS, to see if it is still valid or whether any new evidence has been published. The WCS consultation document has drawn on all the credible evidence available, and the proposed strategy is based on this evidence of need, for both homes and jobs. At the time of writing, it is the Governments intention to bring in 'neighbourhood plans' but the scope of these is yet to be defined. However, at present, the plans will have to conform to the policies in the Core Strategy (or Local Plans as they may be known in the future.) Overall Strategy

Numerous
Question 21 - RC

Comment No. 114
David Feather

Comment No. 428
Councillor Ernie Clark

Comment No. 476
Mrs. Marylyn Timms
Clerk Hilperton Parish Council

Comment No. 661
Mrs C Spickernell

Comment No. 786
Dr Chris Gillham

Comment No. 887
Rose Freeman
Planning Policy Officer The Theatres Trust

Comment No. 935
Wilts Rural Investment Partnership
Wiltshire Rural Investment Partnership

Comment No. 970
Mr Tony Peacock
Coordinator The Showell Protection Group

Comment No. 1192
G Banks

Comment No. 1462
Richard Burden

Comment No. 1476
Tom Pepperall

Comment No. 1513
Mollie Groom
NORTHERN COMMUNITY AREA PARTNERSHIP

Comment No. 1568
Lydiard Millicent Parish Council

Comment No. 1587
Mr E East
The Trust For Devizes

Comment No. 1725
Phil Rice
Malmesbury Town Council

Comment No. 1914
Mrs G Shell
Director Wiltshire Rural Housing Association

Comment No. 1966
Mr Les Durrant
DPDS Consulting Group

Comment No. 2067
Petitt Brothers Contracting Ltd

Comment No. 2091
Richard Burden
Landscape and Planning Advisor
Cranborne Chase & West Wiltshire Downs AONB

Comment No. 2286
Mr Jamie Sullivan
TETLOW KING PLANNING

Comment No. 2417
Mr Paul Walsh
Development Director Selwood Housing Society Limited

Comment No. 2587
Giles Brockbank
Hunter Page Planning Ltd

Comment No. 2806
Mr S Chambers
LPC (Trull) Ltd

Comment No. 2811
Unknown
Tollodine Estates

Comment No. 2817
Mr George McDonic
Chairman Campaign to Protect Rural England - Wiltshire Branch

Comment No. 3056
Mr George McDonic
Director Wiltshire Rural Housing Association
Wilts Rural Investment Partnership

Comment No. 428
LPC (Trull) Ltd

Comment No. 476
Mr Les Durrant
Unknown

Comment No. 570
Unknown

Comment No. 786
Petitt Brothers Contracting Ltd

Comment No. 786
Simon Dring
Knight Frank Agent Badminton Estate