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1. Introduction

- 1.1. The Planning and Compulsory Purchase Act 2004 as amended ('the 2004 Act') requires the Council to prepare and maintain a Local Development Scheme (LDS) setting out a rolling three year programme of work to deliver local planning policy documents. This third iteration of the LDS covers the period 2014 – 2017 and identifies the Local Development Documents (LDDs) prioritised for production by Wiltshire Council, and sets out a timetable for their delivery over the next three years. The first LDS was approved by the Implementation Executive¹ of Wiltshire Council in January 2009 and related to the period 2009 - 2012. It brought together the work already undertaken by the former authorities of Kennet, North Wiltshire, Salisbury, West Wiltshire and Wiltshire County Council. Since that time the LDS has been reviewed and updated in 2011 and 2012.
- 1.2. The Council has a duty to maintain an up-to-date LDS. A review of the 2012 -15 LDS has become necessary to reflect the revised timetables of documents within that LDS dependant on progress of the Wiltshire Core Strategy, and to reflect concerns of the Inspector appointed to examine the emerging Wiltshire Core Strategy².
- 1.3. This revision to the 2012 LDS continues to include the anticipated completion of the Core Strategy by Spring/Summer 2014, a partial review of the Wiltshire Core Strategy (which will involve a review of the saved 2011 local plan policies not replaced by the Wiltshire Core Strategy a key area being to plan positively for all town centres in Wiltshire) and the completion of work to ensure that the accommodation needs of Gypsies and Travellers are provided for in the county. The content of the Gypsy and Traveller DPD has been extended to include output from a full Gypsy and Traveller Accommodation Needs Assessment (GTAA) to inform a review and update of the emerging core strategy policy on travellers.
- 1.4. This latest review of the LDS introduces two new DPDs to the programme. A Wiltshire Housing Site Allocations DPD which will identify, where necessary, new sites for housing, to provide surety of delivery over the whole plan period. In doing so it will include a review of the settlement boundaries currently proposed in the Wiltshire Core Strategy.
- 1.5. A Chippenham Site Allocations DPD will allocate sites and specific details for development in the town to accommodate the levels of growth set out within the Core Strategy³.

¹ The Implementation Executive was the body of elected Councillors responsible for the creation of the new Council. It was drawn from all the previous district and county councils in Wiltshire (17 in total and included representation from all political parties).

² See the Inspectors 10th Procedural Letter 2 December 2013
<http://www.wiltshire.gov.uk/planninganddevelopment/planningpolicy/wiltshirecorestrategy/wiltshirecorestrategyexamination.htm>

³ The proposals currently contained within the draft Chippenham Town Centre Masterplan will be subsumed into this DPD.

- 1.6. The emerging Wiltshire Core Strategy identifies other planning policy documents that may need to be prepared in order to provide support for the implementation of core policies. These are developed further in this edition of LDS (see paragraph 2.11).
- 1.7. The Localism Act 2011 signalled the intention to revoke the regional spatial strategies and introduced neighbourhood plans, neighbourhood development orders and the community right to build. The Government also introduced the National Planning Policy Framework (NPPF) in March 2012 which sets out the governments planning policies for England and how these are expected to be applied. The LDS for 2014 – 2017 takes account of these changes.

2. Schedules of planning policy documents

Existing local development documents and development plan documents

- 2.1. Policies within the documents listed in Table 1 currently form part of the development plan for Wiltshire (and Swindon⁴). A list of 'saved' local plan policies is provided at **Appendix A**.

Table 1: Existing local development documents and development plan documents

Document	Area covered	Status
Statement of Community Involvement LDD (adopted February 2010)	Wiltshire council area	Sets out the process and methods for community involvement for different types of LDDs and for different stages of the plan preparation.
Wiltshire and Swindon Waste Development Control Policies DPD (adopted September 2009)	Wiltshire council area and Swindon borough	Current policy. Sets out generic policies to assist in determining planning applications for waste development up to 2026, subject to monitoring and review.
Wiltshire and Swindon Minerals Development Control Policies DPD (adopted September 2009)	Wiltshire council area and Swindon borough	Current policy. Sets out generic policies to assist in determining planning applications for minerals development up to 2026, subject to monitoring and review.
Wiltshire and Swindon Waste Core Strategy (adopted July 2009)	Wiltshire council area and Swindon borough	Current policy. Sets out the spatial vision, strategic objectives and strategy covering waste provision up to 2026 including the strategic policies and proposals to deliver the vision.

⁴ Wiltshire Council and Swindon Borough Council prepare minerals and waste local plans on a joint basis governed by an existing Service Level Agreement.

Wiltshire and Swindon Minerals Core Strategy (adopted July 2009)	Wiltshire council area and Swindon borough	Current policy. Sets out the spatial vision, strategic objectives and strategy covering minerals provision up to 2026 including the strategic policies and proposals to deliver the vision.
West Wiltshire Leisure and Recreation DPD (adopted February 2009)	Former West Wiltshire district area	Provides additional recreational policies for the west Wiltshire area for the period up until 2016. This DPD will be replaced by policies in future Wiltshire-wide DPDs, including the Wiltshire Core Strategy.
Wiltshire and Swindon Structure Plan 2016 (adopted April 2006)	Wiltshire council area and Swindon borough	Certain policies have been 'saved' until replaced by policies in a new DPD, particularly the Wiltshire Core Strategy (see Appendix A).
North Wiltshire Local Plan (adopted April 2006)	Former North Wiltshire district	Certain policies have been 'saved' until replaced by policies in a new DPD, particularly the Wiltshire Core Strategy (see Appendix A).
Kennet Local Plan 2011 (adopted June 2004)	Former Kennet district	Certain policies were 'saved' on 26 th September 2007 and will remain in place until replaced by policies in a new DPD, particularly the Wiltshire Core Strategy (see Appendix A).
West Wiltshire District Plan First Alteration 2011 (adopted June 2004)	Former West Wiltshire district	Certain policies were 'saved' in September 2007 and will remain in place until replaced by policies in a new DPD, particularly the Wiltshire Core Strategy (see Appendix A).
South Wiltshire Core Strategy DPD (adopted February 2012)	Former Salisbury District area	Sets out the spatial vision, objectives and strategy for the spatial development of the former Salisbury district area and strategic policies and proposals to deliver the vision; including strategic land allocations. Will be subsumed into the Wiltshire Core Strategy.
Wiltshire and Swindon Waste Site Allocations DPD (adopted November 2012)	Wiltshire County and Swindon Borough	Identifies land for future waste management facilities and aggregate recycling facilities up to 2026 in accordance with the Swindon and Wiltshire Waste Core Strategy.
Wiltshire and Swindon Minerals Site Allocations DPD (adopted December 2012)	Wiltshire County and Swindon Borough	Identifies land for future mineral (aggregates) working and aggregate recycling facilities up to 2026 in accordance with the Swindon and Wiltshire Minerals Core Strategy.

- 2.2. There are also a considerable number of Supplementary Planning Documents (SPDs) that support policies within the documents listed in Table 1 that will continue to be in place. Some were prepared before September 2004 and are referred to as Supplementary Planning Guidance.

Partnership Working – Minerals and Waste

- 2.3 Since the formation of Swindon Borough Council in 1997, minerals and waste planning matters have been addressed through joint working arrangements

governed by an extant Service Level Agreement between the two authorities. For the purpose of joint working, Wiltshire Council (formerly Wiltshire County Council) takes the role of 'Lead Authority', but all decisions in terms of planning policy development are mutually shared.

- 2.4 Prior to the formation of Wiltshire Council in 2009, the programme management of Minerals and Waste Local Development Documents was set out in a 'Minerals and Waste Development Scheme' (MWDS) in accordance with Section 16 of the Planning and Compulsory Purchase Act 2004 (as amended). However, since 2009, such matters have been incorporated into the LDSs of the respective authorities.
- 2.5 As outlined in Section 2 (Table 1). Wiltshire Council and Swindon Borough Council have successfully prepared and adopted a complete set of Minerals and Waste Development Plan Documents. These plans are being implemented and monitored through the AMR process. Should the need arise⁵ to review aspects or the entire adopted policy framework, a programme will be developed and adopted through a subsequent iteration of the two authorities respective LDSs.
- 2.6 In accordance with Section 110 of the Localism Act 2011, the two authorities envisage that the current arrangements offer the best approach to planning for minerals and waste development. Should the need arise to extend such arrangements, opportunities for further joint working will be explored.

New local development documents

- 2.7 A number of development plan documents are currently in preparation and will be adopted by the Council in the period 2014 - 2017. These are summarised in Table 2 with more detailed information contained in Appendix B. A summary of the overall programme is in Section 3.
- 2.8 In light of the Government's expectation that 'Local Plans' (i.e. the Core Strategy) should be prepared expediently and put in place as soon as possible the aspiration is to adopt the Wiltshire Core Strategy during Spring/Summer 2014. This will be dependent upon the timely receipt of the Inspector's report.
- 2.9 The Duty to Co-operate was introduced through the Localism Act 2011, with Section 110 of the Act requiring Council's and Public bodies to 'engage constructively, actively and on an ongoing basis' in the preparation of Local Plan documents, including in the preparation of evidence to underpin these documents. The intention being that in the absence of regional government office and regional development agencies those local authorities - in cooperation with neighbouring authorities and other public bodies - take the lead in tackling the big issues that cut across administrative boundaries. The new duty relates to sustainable development or use of land that has a significant impact on at least two local planning areas. Issues that may not be able to be wholly addressed by

⁵ The review of the Minerals and Waste planning policy framework will be triggered if the AMR demonstrates that adopted planning policies/proposals are not delivering planned results; and/or as a result of changes in national policy.

one local planning authority working alone are set in paragraph 156 in the NPPF, and could include:

- Housing where a wider housing market area has been identified
- Provision of major retail/or employment sites
- The provision of infrastructure for transport, waste treatment, energy generation, telecommunications, water supply and water quality
- Measures needed to address climate change, including the management of flood risk
- Provision of open space and recreational facilities.

2.10 The NPPF states Local Authorities should consider producing joint planning policies to address some of these strategic matters, as well as informal strategies such as joint infrastructure and investment plans. A joint approach will not be required where an issue can be addressed adequately within one administrative boundary. When compiling its scheme of work, the Council consider and discusses with neighbouring authorities whether production of joint documents is a sensible course of action, such as with minerals and waste planning. The decisions of such considerations will be carefully recorded, clear justification by way of an explanation of the strategic context behind the course of action taken will be set out and, where necessary, a memo of understanding between the bodies is published. DPDs introduced in this revision to the LDS have been prompted directly by suggestions from the inspector who has been considering work so far on the Council's core strategy. These additional DPDs have a specific role supporting the framework already established in the core strategy and so do not necessitate joint preparation with any neighbouring authorities.

Table 2: New development plan documents

Document	Area covered	Anticipated adoption date	Comments
Wiltshire Core Strategy DPD	Wiltshire council area	Spring 2014 (to be in conformity with national planning policies)	Sets out the spatial vision, objectives and strategy for the spatial development of Wiltshire and strategic policies and proposals to deliver the vision; including strategic site allocations for the period to 2026.
Wiltshire Core Strategy DPD (partial review)	Wiltshire council area	December 2015 (to be in conformity with national planning policies)	This document will refine certain policies to assist in the determination of planning applications, a key area being a review of saved policies from previous district local plans, policies for town centres and recreation.
Gypsy and Traveller DPD	Wiltshire council area	Spring 2014 (to be in conformity with Wiltshire Core Strategy)	Will set out site allocations to provide for the accommodation needs of Gypsies and Travellers in Wiltshire and include a review of overall pitch requirements contained in core policy 47 of the core

Document	Area covered	Anticipated adoption date	Comments
			strategy based on an up to date Gypsy and Traveller Needs Assessment.
Wiltshire Housing Site Allocations DPD	Wiltshire council area	June 2015 (to be in conformity with the Wiltshire Core Strategy)	Will set out additional site allocations for housing, across Wiltshire to ensure supply throughout the plan period. In addition, the document will address the review of existing settlement boundaries.
Chippenham Site Allocations DPD	Chippenham	June 2015 (to be in conformity with the Wiltshire Core Strategy)	Will set out the sites and details of development to accommodate strategic growth options for Chippenham in accordance with Core Policy 10 of the Core Strategy.

Supporting the Wiltshire Core Strategy

2.11 The Council's overall priority is to focus on delivery of the Wiltshire Core Strategy as soon as is reasonably possible. To support the production and implementation of the core strategy there are a number of priority projects to be completed in tandem with the core strategy. These are:

- (i) Infrastructure Delivery Plan - to set out detailed guidance on what infrastructure will need to be provided to support development.
- (ii) Community Infrastructure Levy⁶ - to set out the type and scale of contributions that will be required to build the infrastructure to support development based on the Infrastructure Delivery Plan and Wiltshire Core Strategy.
- (iii) Wiltshire Green Infrastructure Strategy - to set out a strategic Wiltshire-wide green infrastructure network that will comprise of both new and existing green spaces; walking, cycling and horse riding routes; parks, recreational spaces and play areas; water courses and water bodies; areas of high biodiversity value; and access and wildlife corridors such as inland waterways and rivers.
- (iv) Affordable Housing Supplementary Planning Document - to set out detailed guidance on the interpretation and implementation of affordable housing policies in the core strategy.
- (v) Sustainable Construction and Low Carbon Supplementary Planning Document – providing detailed guidance on how new development will be expected to deliver provisions of Core Policy 41, including what information will be needed to support planning applications.

⁶ The Community Infrastructure Levy (CIL) is a charge which local authorities in England and Wales are empowered, but not required, to charge on most types of new development in their area. CIL charges are based on simple formulae which relate the size of the charge to the size and character of the development paying it. The proceeds of the levy will be spent on local and sub-regional infrastructure to support the development of the area. A final version of the brief will be published once the Core Strategy has been adopted.

Additional development plan documents

- 2.12 The emerging Wiltshire Core Strategy makes reference to the potential need for a joint Site Allocations DPD for the land west of Swindon. The Wiltshire Core Strategy is being prepared ahead of the Swindon Core Strategy; the latter has been submitted for examination with hearings anticipated to begin in the spring 2014. Neither of the Core Strategies anticipate the need to allocation land for housing extending the built up area of Swindon westward within Wiltshire. Should emerging policy for Swindon change and new evidence emerge which demonstrates the need for sites to be planned for on land to the west of Swindon within Wiltshire then both councils will work together to prepare a joint site allocations DPD for this part of Wiltshire. This is currently not included in the LDS but the authorities are committed to working together should the need arise.

Other planning guidance post Wiltshire Core Strategy implementation

- 2.13 It will also be important to produce additional planning policy once capacity and resources become available to have in place the full suite of documents that support the implementation of core policies are required to fully replace the saved policies from the former District Local Plans and to provide consistent policy across Wiltshire. Given that any subsequent non-minerals or waste⁷ DPDs and SPDs must conform to the Wiltshire Core Strategy, any future documents must be prepared in accordance with it. The emerging core strategy for Wiltshire (Wiltshire Core Strategy Pre-Submission Document incorporating the proposed changes August 2013) refers to a number of additional guidance notes that may be needed to support the Core Strategy and replace existing SPD that support older saved local plan policies, as follows:
- (i) Planning obligations and the role of Section 106 agreements
 - (ii) Design and local distinctiveness in Wiltshire
 - (iii) A Wiltshire landscape strategy which would involve consolidating existing landscape character assessment, reviewing special landscape areas and preparing developer guidance
 - (iv) Areas of special historic environmental significance
 - (v) The Stonehenge and Avebury World Heritage Site
 - (vi) Travel plans
 - (vii) Town centres
 - (viii) Biodiversity to include the mechanisms to address HRA issues, biodiversity offsetting and developer guidance.

⁷ Minerals and Waste planning policy/guidance documents do not cover the same geography or issues as the Wiltshire Core Strategy.

Other planning guidance being prepared

- 2.14 Work has been progressing on a Devizes Wharf Planning Brief Supplementary Planning Document since June 2010. During the summer 2011 a draft version of the brief was published for consultation.

Neighbourhood plans

- 2.15 The Localism Act (2011) empowered the Secretary of State to revoke Regional Planning Guidance for the South West (formerly referred to as Regional Spatial Strategies) from the development plan and established a new tier of planning at the neighbourhood level. These plans can be in the form of a neighbourhood plan, a neighbourhood development order or a community right to build. The priority for the Council, now the Core Strategy is well advanced, is to support the preparation of these plans and others. Six pilot projects were undertaken in 2011 which helped Wiltshire Council to support future neighbourhood plans as they came forward from 2012 when the Localism Act was implemented. A Neighbourhood Planning Guide has been developed.
- 2.16 Since the initial front runners neighbourhood planning has been popular across Wiltshire and the Council is currently supporting over 50 groups in undertaking Neighbourhood Planning for their area, 15 of which have designated their areas for the purposes of Neighbourhood Planning⁸.

Annual Monitoring Report

- 2.17 Annual Monitoring Reports (AMR) form part of the LDF and have been published for Wiltshire at the end of each calendar year since 2008. The AMR monitors and reviews how well the Council has performed against the timetable set out in the LDS and any changes needed to maintain an up to date LDS. The role of the AMR is also to monitor the effectiveness of the policies included in each DPD.
- 2.18 The Localism Act contains provisions to remove the requirement to submit the AMR to the Secretary of State for approval; it does not contain provisions to remove the need for an AMR. It is now for each council to decide what should be included in their AMR while ensuring that they are prepared in accordance with UK and EU legislation⁹. Wiltshire Council continues to produce an AMR annually.

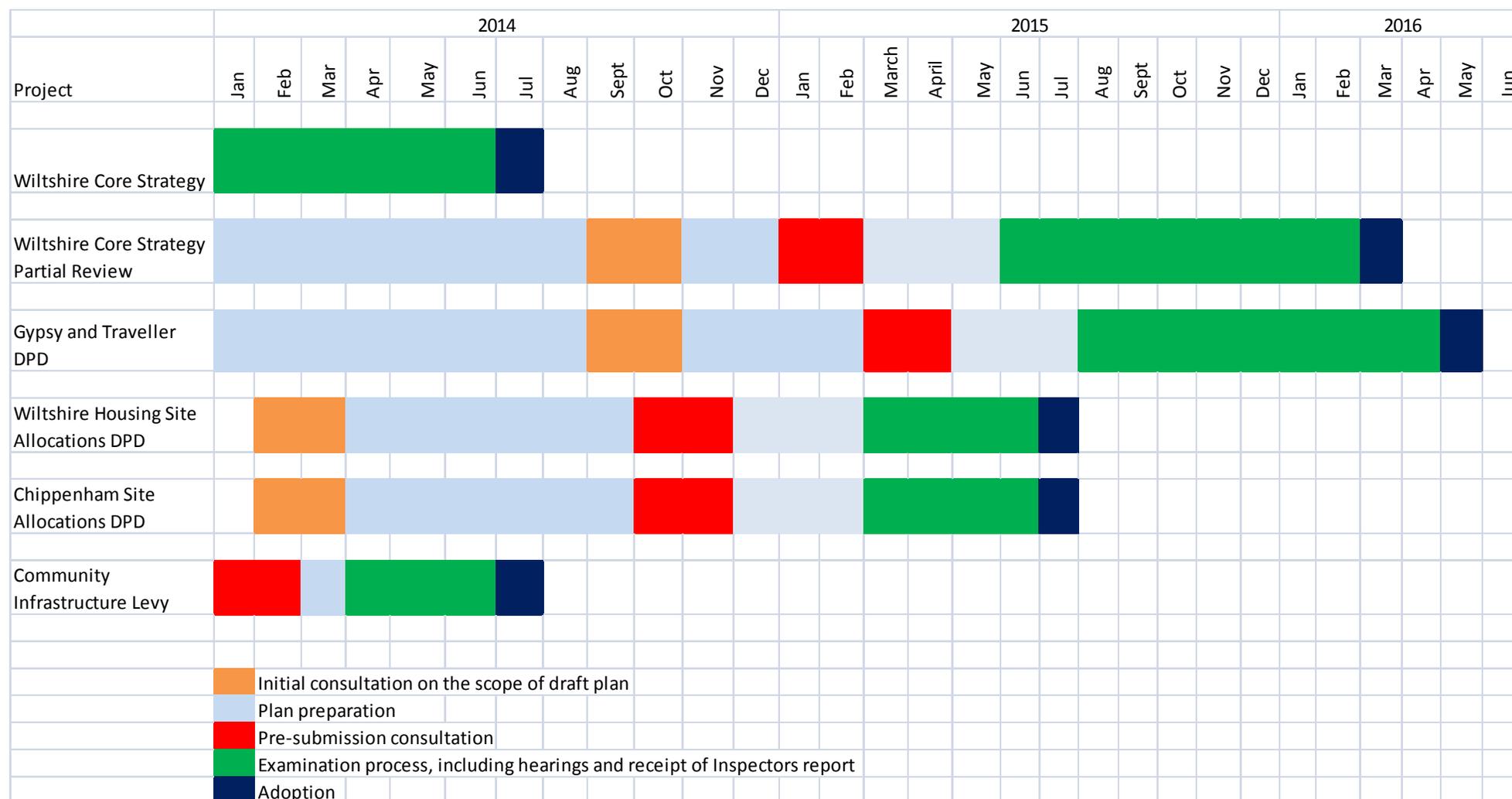
⁸ Neighbourhood Planning Groups with Neighbourhood Planning Area Designations can be viewed online at:
<http://www.wiltshire.gov.uk/planninganddevelopment/planningpolicy/neighbourhoodplanning/neighbourhoodareadesignations.htm>

⁹ Letter to chief planning officers on preparation and monitoring of local plans, March 2011

3. Overall programme for local development document preparation

- 3.1. The overall programme for preparation of the new DPDs listed at Table 2 above, including key milestones, is summarised in the following chart. Significant progress has already been made on the delivery of a number of these documents and accordingly only the later stages of preparation may be shown. Each DPD document follows a similar process:
- (i) Preparation and evidence gathering
 - (ii) Initial issues and options consultation
 - (iii) Further preparation, evidence gathering and responding to comments
 - (iv) Pre-submission consultation (i.e. before submission to the Secretary of State)
 - (v) Submission to the Secretary of State
 - (vi) Period for examination by Inspector and receipt of Inspectors report
 - (vii) Adoption
- 3.2 The key milestone for each document is the point at which the document is submitted to the Secretary of State. Critical to maintaining progress in relation to each document is the role of Cabinet and Full Council. Cabinet provide Member approval to progress to each stage of plan preparation and authorise consultation procedures. Full Council is required to approve the DPD for submission to the Secretary of State and finally adopt the plan as per the Council Constitution.
- 3.3 Prior to commencing work on the documents outlined in Table 3 and throughout their preparation, the Council will exercise its duty to co-operate with neighbouring authorities, focusing on the key cross boundary and strategic issues highlighted by the evidence base.

Table 3: Summary programme for document production



4. Supporting statement

- 4.1. The Government expects local authorities to use effective programme management techniques in progressing delivery of the LDF and producing the evidence base. This supporting statement explains what arrangements are being made to ensure delivery of the programme set out on the previous pages in terms of:
- (i) the development of a sound and robust evidence base
 - (ii) the approach to community and stakeholder engagement
 - (iii) sustainability appraisal (SA) and strategic environmental assessment (SEA);
 - (iv) resources
 - (v) review and monitoring
 - (vi) risk assessment.

Evidence base

- 4.2. The strategies, policies and proposals in the LDF must be founded on a robust and organic evidence base. A considerable amount of data is available at a national level and a number of pieces of bespoke research have been carried out or commissioned by Wiltshire Council to gather local evidence. For example, to support the Wiltshire Core Strategy a number of topic papers were prepared which collectively summarise the evidence available at the time of the consultation document's publication. These draw upon existing published documents and comments received during consultation at earlier stages of the plan's preparation. They are available on the Council's web site <http://www.wiltshire.gov.uk/planninganddevelopment/planningpolicy/wiltshirecorestrategy/wiltshirecorestrategyexamination.htm> along with all the evidence submitted to the Inspector to accompany the submission of the Draft Core Strategy for examination.
- 4.3. The south Wiltshire Core Strategy was adopted in February 2012. The minerals and waste site allocations DPDs have also now been adopted (2012). All three documents were subject to extensive consultation and collation of evidence at all stages in the plan's preparation has taken place. Details of the evidence prepared to support these documents are available on the web site. <http://www.wiltshire.gov.uk/planninganddevelopment/planningpolicy/southwiltshirecorestrategy.htm> and <http://www.wiltshire.gov.uk/planninganddevelopment/planningpolicy/mineralsandwastepolicy/aggregatemineralssiteallocations.htm> and <http://www.wiltshire.gov.uk/planninganddevelopment/planningpolicy/mineralsandwastepolicy/wastesiteallocations.htm>
- 4.4. There are also a number of subject specific pieces of commissioned research to support the DPDs also available on the Council's web site (<http://www.wiltshire.gov.uk/planninganddevelopment/planningpolicy/planningpolicyevidencebase.htm>).

- 4.5 To inform the proposed and revised LDS a number of subject specific pieces of commissioned research are proposed:
- Gypsy and Traveller Accommodation Assessment (GTAA) to support traveller DPD
 - A Wiltshire Open Spaces Study and a Town Centres study to support the WCS partial review
 - Review and update of the Chippenham Transport Strategy to support the Chippenham Site Allocations DPD.

Community and stakeholder engagement

- 4.6 The Wiltshire Statement of Community Involvement was adopted February 2010. Since that time consultation has taken place in accordance with the guidance that it contains. In preparing each stage of a DPD particular emphasis is placed on partnership working with organisations involved in the delivery and implementation of planning policies such as local economic partnerships, housing market partnerships and environmental partnerships.
- 4.7 Wiltshire Council has established a network of 18 community areas each based around a market town (or towns where they are closely related) and their hinterlands. Each community area has an area board (with the exception of the three community areas of Wilton, Mere and Tisbury which are collectively covered by the South West Wiltshire community area board), which meets to discuss local issues and, although led by elected Members of Wiltshire Council, are open to the public to contribute. They are an important vehicle for learning about local issues that should be addressed through the development of DPDs and SPDs and raising awareness about how local communities can get involved in the development of planning policy.
- 4.8 The overall plan for the preparation of individual DPDs (table 1, above) indicates some of the key stages of the plan preparation process where stakeholders and the wider community will be engaged.

Sustainability appraisal

- 4.9 The development of DPDs and SPDs within Wiltshire will be informed by sustainability appraisal. This is an iterative process that develops alongside the preparation of a DPD or SPD through which the economic, social and environmental effects of the plan being prepared are assessed. It incorporates the requirements of Strategic Environmental Assessment as required by EU SEA Directive 2001/42. In 2010 the Council approved a Sustainability Framework as part of the SA Scoping Report for the purpose of assessing the impacts of the Local Development Framework on the local area. This Sustainability Framework will be updated and continue to be used for the assessment of the DPDs proposed in this LDS (adapted to reflect decision aiding questions appropriate to the DPD being assessed).
- 4.10 Local authorities are also required to carry out Habitats Regulation Assessment as part of the planning process under the Habitats Directive. This work should also be carried out alongside DPD or SPD preparation to inform the policies and proposals they contain.

Resources - staffing

- 4.11 The Economic Development and Planning Service is responsible for the preparation of the LDF. Spatial planning officers work on a project basis to provide the resources to support the delivery of DPDs within the LDS from both within the service and in liaison with other council services (eg housing, sustainable transport, education, climate change).
- 4.12 In order to develop the relationship between the emerging Wiltshire core strategy and the Area Boards network, officers within spatial planning will develop their responsibility for planning matters within designated Community Areas, working closely with the Area Boards.
- 4.13 As outlined above a Service Level Agreement with Swindon Borough Council (SBC) is in place setting out joint working arrangements for minerals and waste planning matters. Under the terms of the Agreement, the Council will continue to act as 'Lead Authority', with SBC providing pro-rata support in terms of resources.

Resources - budgets

- 4.14 The cost of producing the LDDs within the LDS will be met from existing and future service budgets.
- 4.15 Partnership working across the Council will be critical to the success of the LDF due to its crosscutting nature and relationship with other plans and strategies. Internal partners, for example, from key services such as housing, sustainable transport and education will be used to inform and develop the evidence base. This may include shared financial resources in order to produce studies /reports that are required by both services. Also, the knowledge and expertise of other service areas will be used to contribute to policy formation and validation of work undertaken at key stages. Finally, the Area Board network will be used wherever possible to support consultation events and in supporting Neighbourhood planning within a Community Area. Resources from outside the service will therefore also contribute towards the preparation of LDDs.
- 4.16 Any opportunities to secure external funding and support in kind will also be exploited where they arise.

Risk assessment

- 4.17 A risk assessment has been prepared that will be monitored and reviewed during the LDS period by senior managers. The risk assessment includes proposed mitigation and contingency measures that may need to be implemented in order to ensure that sound DPDs are prepared and developed in a timely manner. Significant risks that have been highlighted include:
- failure to produce a sound plan
 - failure to secure consensus with members leading to key milestones being missed
 - changes to legislation and regulations delaying the process
 - lack of an appropriate and up-to-date evidence base
 - insufficient resources (financial and staff) at critical points in the process
 - lack of public engagement.

Appendix A: Saved local plan policies

The following table sets out the extant local development plan policies for Wiltshire. These Local Plan policies are ‘**saved**’ and will be used for the determination of planning applications until they are replaced by new policies in the relevant DPD. A second table is provided that sets out associated guidance including supplementary planning documents/guidance that support the saved policies listed.

NAME		EXISTING ADOPTED (‘SAVED’) LOCAL PLAN POLICIES
Local Plans		
North Wiltshire Local Plan 2011 - Adopted June 2006	All policies ‘saved’ until June 2009 (see http://liveinternet.northwilts.net/index/env/planning/localplans/localplan2011.htm) An application has been made to the Secretary of State to save relevant policies beyond June 2009.	
Wiltshire and Swindon Minerals Local Plan 2001 – Adopted November 2001	Policy No and Name 35 Preferred Areas for Sharp Sand and Gravel	
Kennet Local Plan 2011 – Adopted April 2004	Policy No and Name PD1 Development and design HC1 Strategic housing provision HC2 Housing allocations HC5 Net housing density HC6 Efficient use of land HC7 Housing Layout HC9 Quakers Walk HC10 The North Gate, The Wharf and Devizes Hospital HC11 Devizes Hospital HC12 Roundway Mill HC13 Former Le Marchant Barracks HC14 Naughton Avenue, Devizes HC15 Chopping Knife Lane HC16 Garden Centre, Granby Gardens HC17 Pewsey Hospital Phase II HC18 Broomcroft Road/Avonside area HC19 North East Quadrant HC20 Old Rectory/Portando House HC22 Villages with a range of facilities HC23 Housing in Avebury HC24 Villages with limited facilities HC25 Replacement of existing dwellings HC26 Housing in the countryside HC28 Affordable homes target HC29 Definition of affordable housing HC30 Affordable Housing on Large Sites HC31 Integration of affordable housing	

<p> HC32 Affordable Housing Contributions in Rural Areas HC33 Rural Exceptions Policy HC34 Recreation provision on large housing sites HC35 Recreation provision on small housing sites HC37 Demand for Education HC38 New Primary School in Devizes HC42 Additional social and community needs HC45 Gypsy sites ED1 Strategic employment allocations ED3 Nursteed Road, Devizes ED4 Hambleton Avenue, Devizes ED5 Marlborough Road, Pewsey ED7 Protect strategic employment sites ED8 Employment development on unallocated sites ED9 Rural employment locations ED10 Employment development within or on the edge of villages ED11 Employment Development in Avebury ED12 Protecting employment and within villages ED13 Protecting employment and tourism uses on the edge of villages ED16 Farm shops ED17 Town centre development ED18 Prime shopping areas ED19 Devizes and Marlborough Town Centres ED20 Retail Development in Devizes Town Centre ED21 The North gate, The Wharf and Devizes Hospital ED22 Lower Wharf, Devizes ED24 New development in service centres ED28 Shopping facilities in rural areas ED29 Retention of social & community uses AT1 Transport appraisal process AT9 Motor vehicle parking standards AT10 Developer contributions AT18 Intermodal freight facilities AT24 Riverside walks in Marlborough and Pewsey AT25 A342 –A3026 Western Link Road NR3 Local sites NR4 Nature conservation outside designated NR6 Sustainability and protection of the countryside NR7 Protection of the landscape NR19 Renewable energy proposals HH1 Protection of archaeological remains HH3 Avebury World Heritage Site HH10 Areas of minimum change HH11 Marlborough area of special quality TR2 Facilities for boat users on the Kennet and Avon Canal TR4 Permanent off-channel boating facilities at Martinslade/Upper Foxhangers TR6 Tourist facilities in the Avebury World Heritage Site TR7 Facilities for visitors to Avebury TR8 Visitor accommodation in the Avebury World Heritage Site TR9 Car parking in Avebury World Heritage Site TR17 Existing Outdoor Sport and Recreation Facilities TR20 Protection of allotments </p>

<p>West Wiltshire District Plan 2011 First Alteration Adopted June</p>	<p>GB1 Western Wiltshire Green Belt GB3 Safeguarded Land Bradford on Avon C1 Countryside Protection C2 Areas of Outstanding Natural Beauty C3 Special Landscape Areas C4 Landscape Setting C6 Areas of High Ecological Value, Regionally Important Geological or Geomorphological Sites (RIGS), and Sites of Nature Conservation Interest (SNCIs). C6a Landscape Features C9 Rivers C10 Local Nature Reserves C11 Military Land C12 Redundant Military Land C15 Archaeological Assessment C17 Conservation Areas C18 New Development in Conservation Areas C19 Alterations in Conservation Areas C20 Change of Use in Conservation Areas C21 Planning Permission in Conservation Areas C22 Demolition in Conservation Areas C23 Street Scene C24 Advertisements C25 Shopfronts C26 Maintenance of Buildings C28 Alterations and Extensions to Listed Buildings C30 Skylines C31a Design C32 Landscaping C33 Recycling C34a Resource Consumption and Reduction C34 Renewable Energy C35 Light Pollution C37 Contaminated Land C38 Nuisance C39 Environmental Enhancement C40 Tree Planting C41 Areas of Opportunity</p>
	<p>H1 Further Housing Development Within Towns H2 Affordable Housing Within Towns and Villages H3 Urban Brownfield Allocations H4 Urban Mixed Use Brownfield Allocations H5 Urban Extension Allocations H6 Land East of Melksham H7 Staverton Triangle H7A New Terrace Staverton H8 Land at Paxcroft Way, Trowbridge H8a Land South of The Grange, Trowbridge H8b Blue Hills, Devizes Road H8c Land North of Green Lane, Trowbridge H9 Land at Southview, Trowbridge H11 Land South of Paxcroft Mead, Trowbridge</p>

	<p>H12 Land North of Victoria Road, Warminster H13a Land Adjacent to Westbury Hospital H13 Leigh Park, Westbury H14 Land at Station Road, Westbury H16 Flat Conversions H17 Village Policy Limits H18 Areas of Minimum Change H19 Development in Open Countryside H20 Replacement Dwellings H21 Conversions of Rural Buildings H22 Affordable Housing on Rural Exception Sites H23 New Housing Near Intensive Livestock Units H24 New Housing Design E1 New Employment Land Allocations E2 Employment Policy Areas E4 Premises Outside Employment Policy Areas E5 Loss of Employment Floorspace E6 Rural Employment E7 Farm Diversification E8 Rural Conversions E10 Horse Related Development T1a Westbury Bypass Package T2 A36 Trunk Road T4 New Distributor Roads T5 New Link Roads T6 Railway Services T7 Westbury – Swindon Railway Services T8 Melksham Railway Station T8a Rail Freight Facility T9 Bus Services T10 Car Parking</p>
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	<p>HC32 Affordable Housing Contributions in Rural Areas HC33 Rural Exceptions Policy HC34 Recreation provision on large housing sites HC35 Recreation provision on small housing sites HC37 Demand for Education HC38 New Primary School in Devizes HC42 Additional social and community needs HC45 Gypsy sites ED1 Strategic employment allocations ED3 Nursteed Road, Devizes ED4 Hambleton Avenue, Devizes ED5 Marlborough Road, Pewsey ED7 Protect strategic employment sites ED8 Employment development on unallocated sites ED9 Rural employment locations ED10 Employment development within or on the edge of villages ED11 Employment Development in Avebury ED12 Protecting employment and within villages</p>
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	<p>ED13 Protecting employment and tourism uses on the edge of villages ED16 Farm shops ED17 Town centre development ED18 Prime shopping areas ED19 Devizes and Marlborough Town Centres ED20 Retail Development in Devizes Town Centre ED21 The North gate, The Wharf and Devizes Hospital ED22 Lower Wharf, Devizes ED24 New development in service centres ED28 Shopping facilities in rural areas ED29 Retention of social and community uses AT1 Transport appraisal process AT9 Motor vehicle parking standards AT10 Developer contributions AT18 Intermodal freight facilities AT24 Riverside walks in Marlborough and Pewsey AT25 A342 –A3026 Western Link Road NR3 Local sites NR4 Nature conservation outside designated NR6 Sustainability and protection of the countryside NR7 Protection of the landscape NR19 Renewable energy proposals HH1 Protection of archaeological remains HH3 Avebury World Heritage Site HH10 Areas of minimum change HH11 Marlborough area of special quality TR2 Facilities for boat users on the Kennet and Avon Canal TR4 Permanent off-channel boating facilities at Martinslade/Upper Foxhangers TR6 Tourist facilities in the Avebury World Heritage Site TR7 Facilities for visitors to Avebury TR8 Visitor accommodation in the Avebury World Heritage Site TR9 Car parking in Avebury World Heritage Site TR17 Existing Outdoor Sport and Recreation Facilities TR20 Protection of allotments</p>
<p>West Wiltshire District Plan 2011 First Alteration – Adopted June</p>	<p>Policy No and Name</p> <p>GB1 Western Wiltshire Green Belt GB3 Safeguarded Land Bradford on Avon C1 Countryside Protection C2 Areas of Outstanding Natural Beauty C3 Special Landscape Areas C4 Landscape Setting C6 Areas of High Ecological Value, Regionally Important Geological or Geomorphological Sites (RIGS), and Sites of Nature Conservation Interest (SNCIs). C6a Landscape Features C9 Rivers C10 Local Nature Reserves C11 Military Land C12 Redundant Military Land C15 Archaeological Assessment C17 Conservation Areas</p>

C18	New Development in Conservation Areas
C19	Alterations in Conservation Areas
C20	Change of Use in Conservation Areas
C21	Planning Permission in Conservation Areas
C22	Demolition in Conservation Areas
C23	Street Scene
C24	Advertisements
C25	Shopfronts
C26	Maintenance of Buildings
C28	Alterations and Extensions to Listed Buildings
C30	Skylines
C31a	Design
C32	Landscaping
C33	Recycling
C34a	Resource Consumption and Reduction
C34	Renewable Energy
C35	Light Pollution
C37	Contaminated Land
C38	Nuisance
C39	Environmental Enhancement
C40	Tree Planting
C41	Areas of Opportunity
R7	Trowbridge Cricket Ground
R10	Poulton Field Bradford On Avon
R12	Allotments

<p>West Wiltshire District Plan 2011 First Alteration – Adopted June</p>	<p>R13 Sailing Lakes R15 Development at Golf Courses H1 Further Housing Development Within Towns H2 Affordable Housing Within Towns and Villages H3 Urban Brownfield Allocations H4 Urban Mixed Use Brownfield Allocations H5 Urban Extension Allocations H6 Land East of Melksham H7 Staverton Triangle H7A New Terrace Staverton H8 Land at Paxcroft Way, Trowbridge H8a Land South of The Grange, Trowbridge H8b Blue Hills, Devizes Road H8c Land North of Green Lane, Trowbridge H9 Land at Southview, Trowbridge H11 Land South of Paxcroft Mead, Trowbridge H12 Land North of Victoria Road, Warminster H13a Land Adjacent to Westbury Hospital H13 Leigh Park, Westbury H14 Land at Station Road, Westbury H16 Flat Conversions H17 Village Policy Limits H18 Areas of Minimum Change H19 Development in Open Countryside H20 Replacement Dwellings H21 Conversions of Rural Buildings H22 Affordable Housing on Rural Exception Sites H23 New Housing Near Intensive Livestock Units H24 New Housing Design E1 New Employment Land Allocations E2 Employment Policy Areas E4 Premises Outside Employment Policy Areas E5 Loss of Employment Floorspace E6 Rural Employment E7 Farm Diversification E8 Rural Conversions E10 Horse Related Development T1a Westbury Bypass Package T2 A36 Trunk Road T4 New Distributor Roads T5 New Link Roads T6 Railway Services T7 Westbury – Swindon Railway Services T8 Melksham Railway Station T8a Rail Freight Facility T9 Bus Services T10 Car Parking</p>
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<p>West Wiltshire District Plan 2011 First Alteration – Adopted June</p>	<p>T11 Cycleways T12 Footpaths and Bridleways SP1 Town Centre Shopping SP2 Land at Court Street/ Castle Street, Trowbridge SP3 Out of Centre Shopping SP4 Primary Retail Frontages SP5 Secondary Retail Frontages SP6 Local Shopping in Towns and Villages SP7 Village Shops LE1 Leisure and Entertainment LE2 St Stephens Place, Trowbridge TC1 Upper Floor Uses in Town Centres TC2 Traffic management and pedestrian Priority TO1 Tourist Attractions TO2 Minor Tourist Facilities TO3 Hotels, Guest Houses and Self Catering Accommodation TO4 Camping, Caravans, Holiday Homes CF1 Community Facilities and Services General CF2 Re-Use of Community Facilities CF3 Villages and Rural Areas S2 Primary Schools CF6 Leigh Park CF7 Bowerhill CF8 Community Health CF9 Bradford on Avon Police Station CF10 Cemeteries CF11 Travelling Show People CF12 Gypsy Caravan Sites U1a Foul Water Disposal U2 Surface Water Disposal U4 Groundwater Source Protection Areas U4a Sewage Treatment Works U6 Telecommunications I1 Implementation I2 The Arts I3 Access for Everyone</p>
<p>Salisbury District Local Plan 2011 - Adopted June 2003</p>	<p>Policy No and Name G1 General principles for development policies G2 General criteria for development G3 The water environment G5 Water Services G7 The water environment G8 The water environment G9 Planning Obligations G10 Enabling Development G12- G13 MOD land</p>

	<p>D1-D3 General townscape D4-D6 Salisbury Townscape D8 Public Art H1 Housing (district wide) H2 D,E,F Housing (Salisbury) H3 Housing (Old Man. Hosp) H4 Housing (E. Chequers) H5 Housing (Salt Lane car park) H6 Housing (Brown Street Car Park) H7 Housing (Salisbury) H8 Housing (Salisbury) H9 Housing (Amesbury) H10 Housing (Dinton) H11 A Housing (Downton Wick Lane) H12 Housing (MOD Durrington) H14 Housing (Tisbury) H15 Housing (Bulbridge) H16 Housing (Policy Boundaries) H17 Important Open Spaces H18 Amenity open space H19 Housing restraint areas H20 Special restraint areas H21 Special restraint areas H22 Application of Housing Policy Boundaries H23 Land outside Housing Policy Boundaries H24 Housing for the elderly H25 Affordable housing H26 Rural exceptions H27 Housing for Rural Workers H28 Housing for Rural Workers H29 Housing for Rural Workers H30 Replacement Dwellings and Extensions in the Countryside H31 Replacement Dwellings and Extensions in the Countryside H32 Mobile Homes H33 Accommodation for Dependent Persons H34 Gypsy Sites E1 Employment – Old Sarum site E2 Employment- London Road site E3 Employment –Salisbury Central Area E4 Employment – Salisbury Chequers E5 Employment – Brown Street E6 Employment – Old Manor Hospital E7 Employment – Southampton Road E8 Employment- Amesbury and northern employment allocations E10 Employment- Dinton E12 Employment –Mere E14A Employment –Tisbury E14B Employment –Tisbury E16 Employment – General E17 Employment – General E18 Employment –Special Restraint Areas E19 Employment in the countryside E21 Employment in the countryside</p>
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	<p>CN1- CN24 Conservation policies</p> <p>C2 The rural environment</p> <p>C3 The rural environment</p> <p>C4 Landscape Conservation</p> <p>C5 Landscape Conservation</p> <p>C6 Landscape Conservation</p> <p>C7 Landscape Conservation</p> <p>C8 Landscape Conservation</p> <p>C9 Loss of woodland</p> <p>C11 Nature Conservation</p> <p>C12 Development Affecting protected species</p> <p>C13 Enhancement of retained wildlife habitat sites in developments</p> <p>C14 Features of geological or geomorphological importance</p> <p>C15 Nature Conservation</p> <p>C16 Local Nature Reserves</p> <p>C17 Nature Conservation</p> <p>C18 Nature Conservation</p> <p>C19 Best agricultural land</p> <p>C20 Development essential to meet the need of agricultural, forestry and horticulture</p> <p>C21 Farm diversification</p> <p>C22 Change of Use and Conversion of Buildings</p> <p>C23 Change of use of large houses in the countryside</p> <p>C24 Extensions to buildings in the countryside</p> <p>HA1 Development in the New Forest</p> <p>HA2 Housing within the New Forest Villages</p> <p>HA3 Commoner's dwellings</p> <p>HA4 Replacement of existing dwellings in the New Forest</p> <p>HA5 Small-scale business development in the New Forest</p> <p>HA6 Extensions or redevelopment of existing business premises</p> <p>HA7 Change of use of buildings</p> <p>HA8 Indoor sports and recreation facilities</p> <p>HA9 Outdoor recreation facilities</p> <p>HA10 Golf courses in the New Forest</p> <p>HA11 Riding establishments</p> <p>HA12 Private non-commercial stables</p> <p>HA13 Tourist attractions</p> <p>HA14 New hotels in the New Forest</p> <p>HA15 Change of use of buildings to hotel, B&B, guest house or self-catering accommodation</p> <p>HA16 Holiday chalet accommodation</p> <p>S1 Primary Frontages in Salisbury and Amesbury</p> <p>S2 Secondary Shopping Areas in Salisbury and Amesbury</p> <p>S3 Location of Retail Development</p> <p>S5-S7 Salisbury</p> <p>S9 Local shops</p> <p>S10 Shop fronts</p> <p>S11 Farm shops</p> <p>TR18 Measures to assist motorcycling</p> <p>R1A Sports and leisure facilities</p> <p>R1C Recreation – General</p> <p>R2-R3 Open Space Provision</p>
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	<p>R4 Indoor Community and Leisure Provision R5 Protection of Existing Outdoor Facilities R6 Urban Parks R7 Dual use of educational facilities R8-R13 New Sports and Recreation Provision R14 New Leisure Provision R15 Golf courses R16 Developments with River Frontages and Public Access R17 Public Rights of Way R18 Public rights of way R20 Allotments TR1-TR7 General Transport TR8-TR9 Park and Ride TR10 Brunel Link TR11-TR17 District Wide Policies TR20 A350 Shaftesbury Eastern Bypass T1-3 Tourist Attractions and Facilities T4 Tourist Accommodation T6-9 Tourist Accommodation PS1 Community Facilities PS2 Community Facilities PS3 Community Facilities PS4 Education PS5 New Education Facilities PS6 Proposals for Playgroups, Childminding Facilities and day nurseries PS7 Telecommunications PS8 Renewable Energy PS9 Cemeteries</p>
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Appendix B – Document Profiles

LOCAL DEVELOPMENT DOCUMENT PROFILES	
Wiltshire Core Strategy (2006-2026)	
Role and subject	<p>The Wiltshire Core Strategy sets out the Council's spatial vision, key objectives and overall principles for development in the county.</p> <p>The key objectives of the vision will be derived from an analysis of the county's characteristics, a review of the Council's own corporate plans and priorities (for example the Sustainable Community Strategy) and national guidance. At its heart will be the delivery of stronger and more resilient communities based on the principles of sustainability. It will set out a flexible and sustainable spatial strategy for future development in the county. In particular, it will describe the key principles that will govern future development within Wiltshire's Community Areas, identify the location of strategic sites for new housing and employment development, and set out policies with which planning applications will be judged.</p> <p>The Core Strategy will include a key diagram that displays the spatial aspects of the Strategy and include objectives and principles for the whole of Wiltshire, as well as, policies relating to specific locations within Wiltshire. The Core Strategy will also be split between a set of core policies and proposals for Wiltshire's Community Areas; and a set of policies suitable for development control purposes.</p>
Geographic coverage	Wiltshire
Document type/status	Development plan document
Chain of conformity	National policy
Timetable	
Stage	Dates
Processing of representations	December 2012
Submission to Secretary of State	July 2012
Examination (including hearing and receipt of Inspector's report)	Summer 2013 /Spring 2014
Adoption	Spring/Summer 2014
Production and participation	
Lead Service	Economy Development and Planning
Other key Services	Sustainable Transport; Housing; Development Services; Regulatory

	Services; Community Safety; Amenities and Leisure; Major Projects; Adult Care: Strategy & Commissioning; Community Leadership & Support; Libraries Heritage & Arts; Schools; Children & Families, Resources, Improvements & Young People; Legal & Democratic Services and Performance & Risk.
External stakeholders	Infrastructure providers; central and local government agencies; adjoining local authorities; parish and town councils; developers; agents and key landowners; business support organisations; housing bodies; MoD; relevant national interest groups; relevant local interest groups; relevant charities; general public and residents associations and other groups within our community.
Political oversight	Cabinet of Wiltshire Council

LOCAL DEVELOPMENT DOCUMENT PROFILES	
Wiltshire Core Strategy (partial review) (2006-2026)	
Role and subject	<p>The purpose of the partial review of the Wiltshire Core Strategy will be to introduce further detailed development management policies to the adopted Wiltshire Core Strategy. It will involve a review and update of the saved 2011 local plan development management policies not replaced by the Wiltshire Core Strategy and developing additional locally distinctive policies to guide development within Wiltshire consistent with national policy. A key area of new policy will be to plan positively for all town centres in Wiltshire.</p> <p>All policies will be drafted to become part of the Wiltshire Core Strategy. It is not the purpose of the review to re-open discussion about other parts of the plan and will effectively be an addendum to the adopted Core Strategy.</p>
Geographical coverage	Wiltshire
Document type/status	Development plan document
Chain of conformity	National policy
Timetable	
Stage	Dates
Pre-production/community engagement/informal consultation	November 2013-October 2014
Preparation, further evidence gathering and responding to Comments	October 2013-December 2014

Pre-submission consultation	January-March 2015
Processing of representations	March – May 2015
Submission to Secretary of State	June 2015
Examination (including hearing and receipt of Inspector’s report)	June – November 2015
Adoption	March 2016
Production and participation	
Lead service	Economic development and planning
Other key services	Sustainable Transport; Housing; Development Services; Regulatory Services; Community Safety; Amenities and Leisure; Major Projects; Adult Care: Strategy & Commissioning; Community Leadership & Support; Libraries Heritage & Arts; Schools; Children & Families, Resources, Improvements & Young People; Legal & Democratic Services and Performance & Risk
External stakeholders	Infrastructure providers; central and local government agencies; adjoining local authorities; parish and town councils; developers; agents and key landowners; business support organisations; housing bodies; MoD; relevant national interest groups; relevant local interest groups; relevant charities; general public and residents associations and other groups within our community.
Political oversight	Cabinet of Wiltshire Council

LOCAL DEVELOPMENT DOCUMENT PROFILES	
Gypsy and Traveller DPD (2006-2016)	
Role and subject	<p>The Gypsy and Traveller Site Allocations document through assessment and consultation will make provision for sufficient additional pitches in Wiltshire to meet local need.</p> <p>The identification of sites to meet Gypsy and Traveller needs will include an appraisal of current sites, and investigation and consultation exercise about new sites. This will form a spatial plan formally identifying new sites and sites that will be expanded to meet the Gypsy and Traveller community’s needs.</p> <p>The key objectives and principles of the DPD will need to adhere to national policy. The spatial vision will take into account the different needs of groups within the Gypsy and Traveller community and propose a number of sustainable sites that are to either be improved</p>

	<p>or developed to contribute to the overall success of Wiltshire. Gypsy and Traveller pitch allocations form part of the affordable housing provision in Wiltshire.</p> <p>As part of the plan process a fully Gypsy and Traveller Accommodation Needs Assessment will be carried out to inform both a review of the overall permanent and transit pitch requirements in the county and plots for travelling showpeople.</p>
Geographic coverage	Wiltshire (Site Specific)
Document type/status	Development plan document
Chain of conformity	Wiltshire Core Strategy, national policy
Timetable	
Stage	Dates
Preparation, evidence gathering, developing options (to include informal consultations with the settled and travelling community and a full Gypsy and Traveller Accommodation Needs Assessment)	November 2013 – February 2015
Pre-submission consultation	March – May 2014
Processing of representations	June – July 2015
Submission to Secretary of State	August 2015
Examination (including hearing and receipt of Inspector's report)	August 2015 – January 2016
Adoption	May 2016
Production and participation	
Lead Service	Economic Development and Planning
Other key services	Traveller education service, Traveller liaison service, sustainable transport, Housing, Development, Regulatory Services, community safety, amenities and leisure, adult care: strategy & commissioning, community leadership & support, schools, children & families, resources, improvements & young people, legal & democratic services and performance & risk.
External stakeholders	Gypsy and traveller community; infrastructure providers, central and local government agencies; parish and town councils; developers, agents and key landowners; relevant national interest groups (eg Racial Equalities Council); relevant local interest groups (eg North and West Gypsy and Traveller Forum); adjoining local authorities, police.

Political oversight	Cabinet of Wiltshire Council
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LOCAL DEVELOPMENT DOCUMENT PROFILES

Wiltshire Housing Site Allocations DPD

Role and subject	<p>The Wiltshire Core Strategy provides the context for the scale of growth in each community area but it is not specific in every community about the location of growth.</p> <p>The Wiltshire Housing Site Allocation DPD will be used to provide surety of delivery for the whole plan period and will be used to identify sites where there is a potential shortfall in supply on the horizon, or neighbourhood planning is failing to deliver the numbers required to meet local needs. In addition, the document will address the review of settlement boundaries currently outlined in the ‘saved’ policies of the existing district local plans.</p> <p>The document will share the same plan horizon as Wiltshire Core Strategy (i.e. 2026). However, as with all DPDs within the Wiltshire Local Development Framework, policies and proposals will be reviewed on a regular basis in line with published Monitoring and Implementation Plans and AMRs.</p>
Geographic coverage	Wiltshire (Site Specific)
Document type/status	Development plan document
Chain of conformity	Wiltshire Core Strategy, national policy

Timetable

Stage	Dates
Pre-production/survey/community engagement (including site options consultation)	January 2014
Pre-submission consultation	May 2014
Processing of representations and submission to the Secretary of State	July 2014
Submission to Secretary of State	September 2014
Examination (including hearing and receipt of Inspector’s report)	March 2015
Adoption	July 2015

Production and participation

Lead Service	Economic Development and Planning
Other key Services	Sustainable transport, Housing, Development Management Services, community safety, amenities and leisure, adult care: strategy & commissioning, community leadership & support, schools, children & families, resources, improvements & young people, legal & democratic services and performance & risk.
External stakeholders	Infrastructure providers; central and local government agencies; adjoining strategic/local authorities; parish and town councils; developers, agents and key landowners; relevant national interest groups; relevant local interest groups; MoD;
Political oversight	Cabinet of Wiltshire Council

LOCAL DEVELOPMENT DOCUMENT PROFILES	
Chippenham Site Allocations DPD	
Role and subject	<p>Chippenham is a market town in the north of Wiltshire and has been allocated as a Principal Settlement within the Core Strategy. It is one of the largest towns in Wiltshire with excellent transport links, and close proximity to Bath and Bristol. The strategy set out in the Wiltshire Core Strategy allocates significant amounts of employment and housing to be provided within the town.</p> <p>The Chippenham Site Allocations DPD will be developed with urgency after the Core Strategy has been adopted to ensure that specific development sites are allocated to fulfil the growth set out in the Core Strategy, and to ensure that clear development briefs for each site have policy status</p> <p>The Sites Allocation DPD specifically for Chippenham will be in line with the timescale of the Core Strategy setting out development to provide for housing need up to 2026. The opportunity afforded by a DPD produced especially for Chippenham will also be used to carry out a holistic review of land use planning matters in the town including the delivery of regeneration schemes promoted through the Chippenham Vision and draft Chippenham Town Centre Masterplan</p>
Geographic coverage	Wiltshire Chippenham community area incorporating parts of Corsham and Calne community area which are adjacent to the built area of Chippenham town.
Document type/status	Development plan document
Chain of conformity	Wiltshire Core Strategy, national policy

Timetable	
Stage	Dates
Pre-production/survey/community engagement (including site options consultation)	November 2013 – September 2014
Pre-submission consultation	October – December 2014
Processing of representations and submission to the Secretary of State	January - February 2015
Submission to Secretary of State	March 2015
Examination (including hearing and receipt of Inspector's report)	March – April 2015
Adoption	July 2015
Production and participation	
Lead Service	Economic Development and Planning
Other key Services	Sustainable transport, Housing, Development Management Services, community safety, amenities and leisure, adult care: strategy & commissioning, community leadership & support, schools, children & families, resources, improvements & young people, legal & democratic services and performance & risk.
External stakeholders	Infrastructure providers; central and local government agencies; adjoining strategic/local authorities; parish and town councils; developers, agents and key landowners; relevant national interest groups; relevant local interest groups; MoD; Chippenham Vision.
Political oversight	Cabinet of Wiltshire Council

Supporting Documents	
Wiltshire Community Infrastructure Levy Charging Schedule (CIL)	
Role and subject	A charge on development designed to offset the costs of delivering infrastructure required to support growth in local communities. The document will set out the relevant charges to be levied on new development in Wiltshire.
Geographic coverage	Wiltshire
Document type/status	Charging Schedule (supporting the delivery of infrastructure in line with Core Policy 3 of the Wiltshire Core Strategy)

Chain of conformity	Wiltshire Core Strategy, Wiltshire Infrastructure Delivery Plan, national policy
Timetable	
Stage	Dates
Pre-production/evidence gathering	March – August 2012
Consultation on Preliminary Draft Charging Schedule	October – November 2012
Processing of representations, responding to changes in national guidance / legislation and further evidence gathering	December 2012 – December 2013
Consultation on Draft Charging Schedule	January 2014 – February 2014
Submission to Secretary of State	March 2014 (subject to progress of the Wiltshire Core Strategy)
Adoption	July 2014 (subject to progress of Wiltshire Core Strategy)
Production and participation	
Lead Service	Economic Development & Planning
Other key services	Sustainable transport, Housing, Development Management Services, community safety, amenities and leisure, adult care: strategy & commissioning, community leadership & support, schools, children & families, resources, improvements & young people, legal & democratic services and performance & risk.
External stakeholders	Infrastructure providers; central and local government agencies; adjoining strategic/local authorities; parish and town councils; developers, agents and key landowners; relevant national interest groups; relevant local interest groups; MoD;
Political oversight	Cabinet of Wiltshire Council

GLOSSARY

A guide to the terminology used in this document

Annual Monitoring Report (AMR) - A report on how the Council is performing in terms of the Local Development Framework. It includes a review of the Local Development Scheme's timetable and monitors the success of development plan document policies.

Community Infrastructure Levy (CIL) – A charge levied by the Council on new development to fund the provision of infrastructure and wider community benefits. In order to charge the levy, the Council must have an adopted CIL Charging Schedule. By mid 2014, the CIL will be the primary mechanism for securing financial contributions from developers.

Community Infrastructure Levy Charging Schedule – A document that sets out the Council's proposals for securing funds from new development. The Charging Schedule must be based upon a robust evidence base (linked to the Infrastructure Delivery Plan and robust viability assessments) and subjected to meaningful consultation. The Schedule will be examined by an independently appointed assessor (generally the Planning Inspectorate); and if found sound, the Council can then charge CIL.

Core Strategy – A Development Plan Document setting out the spatial vision and strategic objectives of the planning framework for an area.

Development Plan Document (DPD) - A document setting out the Council's planning policies and proposals. They are subject to community involvement, consultation and independent examination. A sustainability appraisal is required for each development plan document.

Gypsy and Traveller Accommodation Assessment (GTAA) – An assessment of the accommodation needs of gypsies and travellers.

Local Development Document (LDD) – The documents that set out planning policies for specific topics or areas, which make up the Local Development Framework.

Local Development Framework (LDF) – A portfolio of local development documents including all those policies forming the framework for future development.

Local Development Scheme (LDS) – A timetable for the preparation of local development documents.

National Planning Policy Framework – The National Planning Policy Framework was published on 27 March 2012. The framework gives guidance to local councils in drawing up local plans and on making decisions on planning applications. This is a key part of the government's reforms to make the planning system less complex and more accessible, and to promote sustainable growth.

Neighbourhood Planning – The Localism Act, which received Royal Assent on 15 November 2011, introduced new rights and powers to allow local communities to shape new development by coming together to prepare neighbourhood plans.

Saved Plan - Under the Planning and Compulsory Purchase Act 2004, adopted Local Plan's have the status of "saved plans" until they are replaced by local development documents.

Saved Policies - The Government has set out procedures for saving adopted local plan policies beyond the period allowed in the Planning Act for saved Local Plans, until they have been replaced by policies in local development documents.

Spatial Planning - Includes economic, social and environmental issues as well as the physical aspects of location and land use.

Sustainability Appraisal (SA) - These are required under national legislation for emerging policy and include consideration of social and economic impacts as well as impacts on the environment. Wiltshire is producing a combined SA and Strategic Environmental Assessment (see below).

Statement of Community Involvement (SCI) – This is a document which sets out how the Council will consult and involve the public at every stage in the production of the Local Development Framework. It also applies to major development control applications. The SCI is not a development plan document.

Strategic Environmental Assessment (SEA) - An appraisal of the impacts of policies and proposals on economic, social and environmental issues, required by European legislation. A combined SEA and Sustainability Appraisal is being undertaken for Wiltshire.

Supplementary Planning Document (SPD) – A Local Development document which provides additional advice and information relating to specific policy or proposals in a Development Plan Document.



The Planning Inspectorate

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Mr A Cunningham
Director of Economy and
Regeneration
Wiltshire Council
County Hall
Trowbridge
BA14 8JN

Our Ref: PINS/Y3940/429/9

Date: 2nd December 2013

Dear Mr Cunningham,

Wiltshire Core Strategy

I acknowledge receipt of the latest bundle of Examination documents which include the outcome of the most recent post-hearings consultation and EXAM/34A (28th Nov), the track changed Core Strategy. Whilst my report is not yet complete and as indicated in my last letter, I am in a position to seek the views of the Council on a number of key matters. In so doing, I am conscious of the Council's formal request under S20(7c) for me to modify the submitted plan in order to secure soundness.

As you would expect, I recognise that Wiltshire is a large county and that the Core Strategy seeks to address a broad range of inter-related and often complex issues. There are many good planning reasons for having a sound plan to be in place as soon as possible and I appreciate the endeavours of your team to supply information and clarifications to date. Working further towards this end, the matters summarised below are those upon which I am most interested to hear how the Council may wish to proceed. Such matters are not exhaustive of those that will be addressed in my final report albeit many aspects of the plan appear justified, positively prepared, consistent with national policy and likely to be effective in their implementation.

1) **Housing**

As you will be aware, the National Planning Policy Framework requires, amongst many other matters, that any Local Plan/Core Strategy should be based upon robust evidence to ensure that the full objectively assessed needs for market and affordable housing are met within a specific Housing Market Area (HMA) as far as is consistent with other Framework policies. The Framework, which post dates some of the Council's evidence such as Topic



INVESTOR IN PEOPLE



Paper 15, has the aim of boosting significantly the supply of housing and indicates that Councils should plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups.

Against this context, I am mindful of the body of evidence that has been provided to the Examination, including the Council's Topic Papers, the SHMA and the wealth of submissions made by interested parties. In short, I am currently inclined to conclude that the balance of the evidence does not support an objectively assessed housing need as low as 37,000 homes.

For example, based upon the Fordham work, allowing for completions and notwithstanding an affordable housing need that may exceed 1,100 dwellings per year¹, levels of housing need appear to warrant provision in the order of 44,000 dwellings over the plan period. Alternatively, based upon ONS population projections, the Council's evidence suggests the housing need would appear to be in the order of 43,200 (43,900 allowing for concealed households). Various alternative assessments of housing need produced by interested parties have utilised the available data in differing ways, for example employing the Chelmer methodology, to indicate that levels of need exist above 44,000 dwellings over the plan period². Such approaches incorporate consideration of 2nd home ownership, vacancy rates and the economic aspirations of the Council. Ultimately they support an objectively assessed need that is significantly greater than the minimum CS figure of 37,000 dwellings over the plan period.

Rates of migration undoubtedly influence levels of housing need and I have had regard to the Council's balancing housing markets model. However, a housing figure as low as 37,000 homes over the plan period does not appear justified. My current interpretation of the evidence leads me to find that the objectively assessed housing need across the three Wiltshire HMAs would be in the region of 44,000 homes for the plan period.

With paragraph 47 in mind, the Council will be aware that the Framework requires a Local Plan to be aspirational but realistic. Against this context, the setting of a housing requirement which is undeliverable may compromise the ability of the Plan to effectively deliver sustainable forms of development supported by adequate infrastructure. Topic Paper 15 indicates that past delivery rates have averaged approximately 2,100 homes per annum during the period of 2001-2008. The Council consider that the potential deliverability of housing should result in a base for the dwelling requirement that does not exceed 43,200 new dwellings over the plan period which seems reasonable. Indeed, the evidence indicates that a notable increase in average housing delivery over the remainder of the plan period would be required to deliver, for example, in excess of 44,000 homes.

Nonetheless, the Framework calls for a significant boost to housing supply. The preferred Option 1 within the Council's SA identifies the broad acceptability of between 35,800 and 42,100 new homes. With regard to the evidence, including past delivery rates, and to ensure consistency with national policy, I am minded currently to find that the CS housing requirement should be expressed as a minimum figure towards the upper end of this range. Any

¹ STU/21 para 9.49 on

² See POS Barton Wilmore and Gladman and Redrow et al

suggestions you may have as to how this can be established within the CS would be appreciated.

Such a modification would have implications for other parts of the CS, for example, the disaggregation of housing across the three HMAs, the distribution of development within the community areas and the indicative housing land supply. Could you please indicate how the Council would contemplate accommodating such a change?

I note from Table 3 of the Council's updated Housing Land Supply Statement that the Council considers that it has a deliverable housing land supply of some 11,164 homes for the period 2013-2018 which would represent in the region of a 5 year (+5%) housing land supply based on a requirement of approximately 42,000 homes. Such figures would need to be revisited and confirmed for the most up to date assessment to indicate consistency with national policy. Is it feasible, for example, to identify a broad disaggregation for each HMA whereby the early production of a Sites Allocation DPD could provide a means of providing the subsequent detail of site allocation? Such a process could be complementary to any neighbourhood planning process currently underway or those which subsequently emerge and would supplement the planned CS Review. To ensure consistency with the Framework, I would need clarification as to how the LDS would be amended and how the housing land supply would be met against an increased housing requirement.

2) Affordable Housing

The evidence indicates a considerable need for various forms of affordable housing throughout Wiltshire. Core Policy 43 seeks the provision of at least 40% (net) on sites of 5 or more dwellings and financial contributions in other circumstances. In essence and whilst I recognise a considerable need for such housing, I am concerned that the figure of 40% is not justified adequately by the evidence base, particularly the Affordable Housing Viability Assessment (STU/51).

STU/51 provides some support for the policy figure of 40% for both the strategic sites and other notional sites but it does so primarily on the basis of tenure being affordable rent. If, for example, social rent were required, STU/51 indicates the likely need for flexibility to be necessary in securing other potential infrastructure, particularly in areas of lower value. Similarly, STU/51 indicates that 40% affordable housing can only be required on the basis of the Code for Sustainable Homes Level 4 from 2013 (in the context of providing housing for affordable rent) and that Code 5 from 2016 would only be viable if supported by a proportionate increase in sales values in the intervening period.

The Framework requires a Local Plan to be produced with due consideration of relevant standards and policies together with their impact upon development throughout the economic cycle. It would therefore appear that a range of tenures delivering 40% affordable housing without subsidy (accommodating changes to the Code for Sustainable Homes) is most challenging to secure under current and foreseeable circumstances. As mentioned previously, the CS can reasonably be aspirational but must also be capable of effective delivery.

Whilst the Council has proposed to delete its requirement for affordable housing to be constructed to the latest Housing Corporation Standards, there

appears to be no substantive evidence which analyses alternative affordable housing proportions, for example those lower than 40%. Whilst being progressed, there are only limited details of the Council's intended Community Infrastructure Levy. The Framework (para 173) is clear that the sites and scale of development in a plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened. With particular regard to STU/51, the CS approach to affordable housing does appear to risk the delivery of key elements of the plan.

Core Policy 43 acknowledges that the provision of affordable housing may vary on a site by site basis with regard to factors which include development viability. This introduces a necessary degree of flexibility which could aid the effectiveness of the CS. Nonetheless, the CS should be justified adequately and the balance of the evidence does not currently support the 40% figure as a minimum requirement for affordable housing on sites of five dwellings or more. The justification and effectiveness of the policy is in question. However, there is insufficient evidence to establish what alternative figure may be justified and therefore I am faced with a conundrum of how Core Policy 43 and its supporting text may be modified to ensure the CS as a whole is justified adequately and will be effective in operation.

For example, the simple deletion of the 40% reference within Core Policy 43 would remove the unjustified requirement on all sites but it would not provide particular precision for the plan as a whole or an effective means of maximising the provision of necessary affordable homes in the county. Supplementing the modified policy by keeping a broad target within the supporting text may be feasible but would require justification and I remain conscious of the need to avoid the ineffective burden of individual site negotiations on the majority of schemes which come forward. Can the Council direct me to any evidence which supports clearly a lower figure than 40%? It may be necessary for the Council to revise STU/51 to look at alternatives which will be clearly viable in a more comprehensive range of circumstances so that the objectives of the CS may be fulfilled. Clearly, subsequent review could be programmed as necessary. I would appreciate your constructive thoughts on how to progress this important matter.

3) Gypsy and Travellers

The 'Planning policy for traveller sites' (PPTS), alongside the Framework, sets out national policy on this issue and indicates the evidence based approach that local planning authorities should take in relation to gypsies and travellers.

As indicated by the PPTS (para 6), there is an expectation that a robust evidence base exists to establish accommodation needs and inform the preparation of a local plan. By its own evidence, the Council acknowledges that the Gypsy and Travellers Needs Assessment (GTAA) undertaken in 2006 and which informed the draft RSS had a number of weaknesses that led to an underestimation of need and a consistent understatement of the level of requirement for residential pitches. It relied too heavily on caravan count data, failed to provide an accurate estimate of the travelling community residing in bricks and mortar, produced a low estimate of need from unauthorised sites, included a high pitch turnover on the supply side and did not examine adequately the needs of Travelling Showpeople. Furthermore, it also sought to provide an indication of requirements only between 2006 and 2011. The

subsequent Proposed Changes to the draft RSS increased pitch provision and were used by the Council to inform its Wiltshire Core Strategy Consultation Document (core policy 31).

Subsequent concerns as to the efficacy of the proposed pitch provisions led to what the Council has termed 'a light touch' review of the GTAA to provide revised pitch requirements for the period 2011-2021. The pitch provisions in the CS are lower than those in its Consultation Document. The Council's Topic Paper 16 provides a review of the GTAA and uses the July 2011 caravan count as evidence of current need. The Council considers that this Topic Paper represents an up to date statement of the need for traveller pitches in Wiltshire as of December 2011.

During the Examination process a number of issues were raised in relation to the Council's justification for Core Policy 47 and the content of Topic Paper 16. In particular and with regards to the latter, concerns were raised at the validity of the figures contained in Table 6 and the absence of any independent benchmarking of the Topic Paper as a whole. These concerns would appear to have some validity in as much as overcrowding on local authority sites and unauthorised developments/ encampments may have been underestimated with the consequent effect that there may be an additional need for pitches that exceeds the Council's figure of 88 (Table 6 2011-2016). With regards to supply, the Council appears to countenance 10 pitches (Cricklade) which have unresolved issues of deliverability whilst a further 6 may have limitations as to their occupation (eg family members only). The evidence is not conclusive on these matters but leads to a concern that the potential supply of additional pitches (2011-2016) is overestimated. The net effect is that there is a degree of substantive doubt as to whether the figures within Topic Paper 16 justify robustly the pitch requirements within Core Policy 47. The data contained and presented in the caravan count for 2013 does not aid clarity on this point.

With regard to the PPTS (para 9) the CS does not identify a supply of specific deliverable sites for the next 5 years nor does it identify a supply of specific developable sites or broad locations for growth for the remainder of the plan period. Consistency with this aspect of national policy is not achieved.

The Council has proposed a change to Core Policy 47 that would make clear that the pitch requirements are minimums. This would be prudent and would introduce flexibility within the plan which would aid the effectiveness of its delivery. The CS is also clear that a Gypsy and Travellers Site Allocation DPD, providing a further opportunity to work with neighbouring authorities, will be prepared to aid the implementation of Core Policy 47 and to deliver the pitch requirements therein. Overall however, the justification for the pitch requirements of Core Policy 47, which will inform any subsequent part of the development plan, is weak. Given the content and subsequent analysis of the GTAA, a more robust approach for the purposes of informing the CS may have been to pursue 'Alternative Option 4' to recalculate local need. It is unsatisfactory that the Council has chosen to merely undertake a limited review of a document which contained previously acknowledged flaws.

Indeed, Topic Paper 16 acknowledges that the data relating to the needs of Travelling Showpeople is limited and not robust enough to extrapolate beyond 2011. The 5 plots identified within Core Policy 47 appear to have been derived from the draft RSS which were required in the period to 2011 but not delivered. At best this figure is that of an historic identified need; rolling it forwards is a

simplistic approach which does not incorporate robust evidence of current or forecast needs for the immediate plan period.

Whilst the Topic Paper appropriately discounts the option of not making provision for transit sites, the subsequent CS approach is undermined by the absence of clear and substantive evidence. As Topic Paper 16 indicates: "Given the lack of consistent records the range indicated in Table 11 of between 17 ... and 35 ... unauthorised encampments may in reality be much higher than that recorded." The figure of 25 (2011-2016) is consequently not particularly well founded and is itself inconsistent with Core Policy 47 which seeks 25 between 2011 and 2021.

Notwithstanding the intended DPD, I must query whether the CS approach towards gypsies, travellers and showpeople is consistent with national policy and is justified by the evidence base. Whilst the Council has requested that I modify the plan to ensure soundness, this is most challenging and may not be feasible on the basis of the available data.

It appears to me that the Council could reassess this matter with a view to ensuring that it does not underestimate the requirements for the remainder of the Plan period. The programmed DPD could assist in matters of specific delivery but the CS should logically set a robust indication of necessary pitch provision for the relevant period, including the next five years whilst acknowledging the absence of a specific land supply. Consequently further work would appear to be required to ensure that there is reliable data to inform the strategic content of the plan. Your constructive thoughts on how to progress this matter would be welcome.

4) Chippenham and Strategic Allocations

Without going into full details, there is a body of evidence which provides support for the strategic allocations identified in Core Policy 10. Nevertheless, the Council is obliged to consider whether reasonable alternatives exist in order to ensure that the submitted plan is justified adequately.

During the preparation of the submitted CS, the Council considered there was positive scope for further strategic development to the east of Chippenham. The approach presented was amended following consultation on the Wiltshire 2026 publication. In this context, yet not exclusively so, a number of concerns have been expressed at the way in which the Council has considered alternatives to the content of Core Policy 10 and the way in which options have been assessed. In short, I share some of those concerns.

It is important, as indicated by case law, that the process and outcomes of Sustainability Appraisal (SA) can withstand scrutiny as an evidence source which assists in justifying the content of the CS. With this in mind, the proponents of unallocated land to the east of Chippenham (the '2020 site') have submitted detailed evidence identifying potential shortcomings in the Council's SA and site selection process. A primary concern is the way in which the Council has dealt with the 2020 site in relation to other options.

Whilst recognising that professional judgements need to be made in undertaking the SA process, it is important for reasons of robustness and legal compliance, that the SA process deals with reasonable alternatives in a fair and

comparable manner. The reasoning for the Council's amended approach to strategic sites in Chippenham can be found within Topic Paper 12³ and elsewhere. The process of site selection has been informed by the iterative SA which has been updated on numerous occasions. Yet the evidence does not indicate that the Council considered equitably the reasonable alternative of an East Chippenham allocation (reduced in scale compared to the Wiltshire 2026 proposal) against the preferred option that ultimately found its way to be part of Core Policy 10.

The Council's SA states that transport impacts are a key issue in the consideration of Chippenham's strategic site options. However and amidst a wealth of other evidence, the assessment of Option 3 (within STU/11) that informed the SA and which included the 2020 site, was undertaken without an assumption that a completed eastern distributor road would be provided through developer contributions. This is in contrast to the consideration of Options 1 and 2 with their associated infrastructure, the latter of which was assessed with the assumption that a necessary road bridge would be provided through developer contributions. The balance of evidence suggests both elements of infrastructure for Options 2 and 3 are capable of being delivered.

Whilst the Council's evidence acknowledges that mitigation in the form of a completed eastern distributor road for Option 3 was likely, the mitigation was not assumed to be in place for the testing/modelling of Option 3. Instead, Option 3 was tested on the basis of a connection to the A4. Such an approach is not equitable for the purposes of the SA; particularly when the evidence indicates that Option 3 could not be feasibly completed without the distributor road. The manner in which this matter has been treated has affected the content of the SA.

The consequent effect of such an approach risks the inaccurate identification of transport effects within the SA. The basis for the SA assessment of Option 3, particularly in terms of the 'Transport' criterion, is therefore not well founded. In this relatively narrow respect, it is unreliable evidence which does not accurately inform the identification of preferred options. The 'Entran' report prepared in support of the 2020 site provides evidence which supports a conclusion contrary to that of the Council. The justification for the different approach taken by the Council in relation to Options 2 and 3 is unconvincing⁴; I do not accept that the omission of testing the evidentially required eastern distributor road was necessary to ensure a 'level playing field' with other alternative options.

Furthermore, the evidence submitted by proponents of the 2020 site as part of the CS pre-submission consultation, which includes specialist SA evidence, indicates that the 2020 site would perform better against the SA objectives than perceived by the Council. Whilst I accept that different professional judgements can be exercised, this evidence is not countered specifically and fully by the Council, has some weight and consequently introduces a degree of substantive doubt as to whether the Council's SA accurately assesses the effects of the 2020 site against the SA criteria.

I have considered, in the context of all the SA criteria and the balance of the evidence available, whether the weaknesses in the Council's approach are

³ Topic Paper 12 Figure 1, Table 4 et al

⁴ EXAM/09C

sufficient to undermine the justification for the content of Core Policy 10. Ultimately, I conclude that they do.

In totality and with regard to the strategic allocations of Chippenham, the SA does not inform robustly the equitable consideration of reasonable alternatives and the subsequent content of Core Policy 10. This is an unfortunate but fundamental shortcoming for this community area. I am unable to conclude that the content of the CS with regard to the strategic allocations of Core Policy 10 is justified and could form part of a sound plan. Consequently, I am considering a modification to the plan which would, in effect, remove the strategic allocations contained within Core Policy 10.

Submissions have been made to the Examination in relation to a large number of potential development sites in and around Chippenham. It is primarily for the Council to ascertain, through due and equitable consideration of alternatives, how best any new development should be accommodated. In the absence of a robust SA in these regards, I have insufficient clear evidence upon which to base a recommendation as to which sites should be developed through until 2026.

It therefore appears necessary for the Council to review its approach to development allocations within Chippenham. Without causing undue delay to the progress of the submitted CS, this could reasonably be secured through a subsequent plan, for example the Sites Allocation DPD or a document specific to Chippenham. Such a review would enable further consideration to be given to not only the housing allocations but also, as necessary, the provision of employment land.

Your thoughts on how this matter should be progressed would be appreciated.

5) Settlement boundaries

The CS refers to defined settlement boundaries for the hierarchy at the level of Large Villages and above. By such means the Council intends to provide clarity on what forms of sustainable development may be carried out where in a manner consistent with the Framework. There is no compelling evidence to suggest that such an approach is flawed.

However, the Council has not reviewed the extent of the boundaries to inform the CS; instead relying upon the pre-existing development plan documents. Some of these were adopted some years ago, for example the Kennet Local Plan (2004), and it cannot be argued with great strength that the settlement boundaries contained therein are up-to-date for the purposes of the CS plan period. Indeed, the Council concedes in Topic Paper 3 'Settlement Strategy' that whilst existing boundaries offer protection to the countryside and guard against urban sprawl/ribbon development they are out of date, do not reflect current urban form and require review and updating ... 'a new boundary would be the ideal solution'. To review boundaries, the Council identifies community led planning as the vehicle to deliver the necessary updates. However, there remains a considerable risk that, for example, Neighbourhood Plans will not be delivered across the county in a comprehensive or timely fashion. Such an outcome would, in the context of the CS Settlement and Delivery Strategy, potentially stymie development initiatives on the basis of an unjustified evidence base and therefore not represent a positive form of planning.

The large geographic scale of Wiltshire and the sheer number and variety of its settlements does present challenges to the practical completion of an appropriate and swift review of settlement boundaries. Rather than delay to a disproportionate extent the adoption of the submitted CS, there appears scope to advance such a timely review through a Sites Allocation DPD as broadly referenced within CS paragraph 4.26. Such work could complement that emerging from any advanced community led planning process and would not negate such processes from reviewing the validity of revised settlement boundaries in the future. Can you identify any specific objection to such an approach and confirm how this may be incorporated suitably both into the CS and the LDS?

6) Retail frontages – town centre boundaries

The Framework requires that plans should, amongst other matters, define the extent of town centres and primary shopping areas based on a clear definition of primary and secondary frontages in designated centres. In this regard, the CS relies upon preceding documents and their saved policies. Due to the various ages of such plans, the approach of the CS is not strong in this regard. The evidence base cannot be considered to be particularly robust with regard to designated frontages and most town centre boundaries. The Council proposes that the partial review of the CS will provide an opportunity to update the designated town centres and their frontages; alternatively this could be accommodated through the Sites Allocation DPD. I would be grateful for your clarification as to the Council's preferred way of moving forwards on these matters and how they could be swiftly resolved.

I trust the above is clear. My work continues and subsequent matters may arise. In the meantime I would be grateful for your early indication as to how the Council would wish to proceed.

Yours sincerely,

Andrew Seaman

Senior Housing and Planning Inspector

19th December 2013

Mr A Seaman
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Your ref:
Our ref : AC/PT

Dear Mr Seaman

Re: Wiltshire Core Strategy

Thank you for your letter of 2 December 2013 and confirmation of receipt of the latest bundle of Examination documents.

As you appreciate, a priority for the Council is to have a sound plan in place as soon as possible and to this end your commitment to provide us with the opportunity to address the issues you have identified in your letter is welcomed.

As requested, we have considered the points in your letter and set out below how the Council wishes to proceed with the matters raised. I will of course write to you again once we have undertaken the necessary work to provide a full response to the matters you raise.

In the interest of maintaining progress on the plan could you please confirm that you are happy with the approaches we are proposing in response to the issues you raise, as set out below?

Housing

I note that you are minded to find that the Core Strategy housing requirement should be expressed as a minimum towards the upper end of the range that has been assessed within the Council's Sustainability Appraisal as 35,800 to 42,100.

This can be established within the Core Strategy by replacing all references to the housing requirement of 37,000 within the draft plan with 42,000 homes. In particular, Core Policy 2 'Delivery Strategy' as the policy relating to the housing requirement would need to be revised.

The higher housing figure would also need to be disaggregated across the three Housing Market Areas (HMA) and distributed at the Community Area level (Principal Settlements, Market Towns and in the South Wiltshire HMA the Local Service Centres, and community area remainders). In addition to Core Policy 2, corresponding changes would also be needed to the housing requirements within each Community Area Strategy policy.

We are therefore reviewing the evidence to determine what the appropriate level of growth would be for each HMA and are minded to use a methodology that is based on the distribution of the additional growth on a proportionate basis, in order to maintain the integrity of the spatial strategy and current balance of growth between each area. We intend to test this at a community area level to ensure consistency with the NPPF and maintain a distribution of growth consistent with Core Policy 1. In doing this, we are mindful that there may be constraints, greater potential or other issues in a particular area that will mean some adjustment of the figure for some Community Areas. The Sustainability Appraisal process will help inform what the appropriate figures are for a particular area.

This work will also consider how the housing land supply can be met against the increased housing requirement. However, we anticipate that it will be necessary for a Site Allocations Development Plan Document (DPD) to be prepared in order to identify new sites and this will be programmed within a revised Local Development Scheme (LDS), which will be considered by Cabinet at their meeting on 21st January 2014.

Your thoughts on the appropriateness of this approach would be appreciated.

If you can confirm that this is acceptable to you in principle we will, following completion of the work, provide the requisite changes to the Plan including the necessary modifications to Core Policy 2, amended community area policies and a revised housing trajectory to demonstrate supply. This will be accompanied with supporting documentation as necessary.

Affordable Housing

As suggested, we have reviewed the evidence relating to levels of affordable housing and conclude that it would be prudent to revise this in order to provide appropriate justification for Core Policy 43 and its supporting text. We therefore propose to instigate an independent review of affordable housing viability in order to look at viable alternatives to inform Core Policy 43 so that the objectives of the Core Strategy may be fulfilled and are making arrangements to expedite this. It is anticipated that we will have an initial report by the first week of February. It is our intention to involve the Swindon and Wiltshire Housing Market Partnership in this work.

Again your thoughts on this approach would be welcomed.

Gypsy and Travellers

In order to provide a more robust indication of pitch requirements for Core Policy 47, we propose to review and update the evidence in Topic Paper 16 in the form of an addendum to take into account the points you raise regarding overcrowding on local authority sites, unauthorised developments and encampments; and pitch supply in the north and east HMA. The outcome would inform proposed changes to the permanent pitch and transit provision requirements in Core Policy 47. This would enable the council to suggest permanent pitch and transit provision requirements, based on a more robust evidence base, via a proposed change to Core Policy 47.

In addition, the council will undertake a complete and comprehensive review of local need in the form of a full Gypsy and Traveller Accommodation Assessment (GTAA) with a base date of January 2014. This work would be undertaken as a matter of urgency culminating

in a swift review of pitch requirements in Core Policy 47 either by way of a single issue review or by widening the scope of the current Gypsy and Traveller Site Allocations DPD, as identified in the LDS, to encompass proposals and formal examination of this aspect. Further work on a revised LDS can determine which of the two would be the most timely and effective, if the general approach is acceptable to you. The need of travelling showpeople will be addressed as part of the GTAA and subsequent DPD.

Chippenham

In the light of your comments on Chippenham and the approach to development allocations, we consider that the most expedient way forward would be to prepare a development plan document specific to Chippenham and for Core Policy 10 to be modified through the removal of the strategic allocations. In order to provide the right context for this, it is proposed that the level of growth for the town be identified within the Core Strategy as set out above.

Settlement boundaries

We are able to confirm that the review of the settlement boundaries can be undertaken as part of the Site Allocations DPD referred to above and this can be referenced within the Core Strategy in the supporting text to Core Policy 2.

Retail Frontages

The Council's preferred approach to update the designated town centres and their frontages would be through the partial review, as already identified in the LDS. The timetable for this will be updated in the revised LDS.

Revision to Local Development Scheme

As referred to above, we are currently working on a revised LDS for approval by Cabinet at its meeting on 21st January. We will be able to let you have a copy of the draft report early in the New Year when it is available.

If you should be minded to accept our suggestions in principle then I will write again setting out the programme of work that we will undertake to allow this process to move forward. With holiday season upon us, an early reply would be appreciated.

Yours sincerely



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Our Ref: PINS/Y3940/429/9]

Your Ref: AC/PT

Date: 23rd December 2013

Dear Mr Cunningham,

Wiltshire Core Strategy

Thank you for your letter dated 19th December 2013. I am pleased that positive progress appears capable of being made with regard to the content of the plan, its justification and the Examination as a whole.

Housing

Your suggestion that the references to 37,000 homes be replaced with 42,000 homes seems reasonable. This will require a disaggregation of the revised housing figure across the three HMAs and, as you mention, this will necessitate a redrafting of Core Policy 2.

I note your proposed approach towards the distribution of growth across the HMAs which seems logical. It is important for the Core Strategy to provide a proportionate level of detail of, in simple terms, what new development is intended to go where and, amongst other documents, the SA, the HRA and the SHLAA will be informative to this process. With this in mind, the issue of further disaggregation of the housing supply at the level of community areas is a matter that I would wish the Council to lead upon.

Provided an adequate housing land supply can be demonstrated, I consider currently that the proposed alterations to the LDS to accommodate a Sites Allocation DPD will provide an effective mechanism, subject to public involvement and independent examination, by which the level of specific detail for each community area over the plan period can be resolved. Indeed, I assume that the Council will retain its intention for an early review of the CS within the revised LDS. Consequently, I consider that there may be scope for a broader and more flexible approach within the CS towards the disaggregation of housing across community areas within each HMA, particularly as many potential developments may fall to be realised later in the current plan period. Thus the Council may wish to come to a view as to whether prescriptive



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minimum housing 'targets' for each community area are necessary at this stage. Clearly, the CS needs to be internally consistent and any redrafted Core Policy 2 must reflect the intentions of the Council's strategy as a whole and Core Policy 1.

I will therefore be pleased to receive an update upon the housing provision of the Core Strategy, its disaggregation, the housing land supply and trajectory with supporting evidence at the earliest opportunity.

Affordable Housing

Your suggested approach towards reviewing the evidence that has informed Core Policy 43 seems sensible. It seems logical that this will be undertaken in the knowledge of my earlier comments and also the submissions made to the CS and in relation to the Hearing for Matter 4 'Housing'.

Gypsy and Travellers

I welcome the intention to provide further evidence upon the issue of Gypsy and Travellers and note your intention to update Topic Paper 16 which should be of particular use. I assume from your letter that you intend the new GTAA would follow the update to the Topic Paper but would not be available to inform the currently submitted CS.

If that is the case, then it is important for the Council to be able to show as far as is practicable and proportionate, within the proposed addendum, how the CS is consistent with national policy, particularly the 'Planning policy for traveller sites' (especially Policies A to D). Such work should also identify how, albeit in an interim fashion until the GTAA is complete, the Council will adopt a positive approach towards the gypsy and travelling community. In the interests of clarity and to aid future decision making in the shorter term, it may be necessary for the Council to acknowledge within the CS any absence of a requisite land supply until such time as the GTAA and the proposed DPD are completed.

Please note however, that I can give no assurance at this time that such an approach will be adequate for the purposes of my examination. The details will be determinative.

Chippenham

In light of your comments, I would be pleased to receive any suggested changes from the Council to the CS and Core Policy 10 in particular.

Settlement Boundaries and Retail Frontages

In light of my previous correspondence, I would be most interested at the speed by which both of these important matters can be resolved satisfactorily. Undue delay in identifying robust boundaries and frontages may weaken the overall approach of the CS in the context of national policy. The content of the revised LDS, which I note will be available in draft shortly, will be important in these regards.

It would appear that there may be a practical and reasonable way forwards in relation to the current Examination. I look forward to receiving further details of the Council's work programme which will help to deliver the matters referred to above. I remain anxious to expedite the Examination process in an efficient manner although there may be a necessity for further hearings if the consultation processes, that will invariably be required, and matters arising cannot be dealt with adequately by way of written representation.

Yours sincerely,

Andrew Seaman

Senior Housing and Planning Inspector