



Wiltshire Local Plan

Pre-Submission Draft 2020-2038 (Regulation 19)
Duty to Cooperate Report

September 2023

Wiltshire Council

1. Introduction

- 1.1 This statement sets out how the Council has complied with the duty to cooperate in accordance with Section 33A of the Planning and Compulsory Purchase Act 2004¹ (as amended). The document focuses on the outcomes of the duty to cooperate engagement with prescribed bodies and neighbouring authorities throughout the preparation of the draft Wiltshire Local Plan Review (“the draft Plan”) to date.
- 1.2 This statement begins by setting out the relevant legislation, national policy and guidance on duty to cooperate, it then goes on to outline the context for the draft Plan – i.e., why are we preparing the Plan and what will it replace, as well as setting out its scope and strategic role in helping deliver plan-led development. The subsequent section sets out the strategic issues that the Plan needs to address, who the Council must cooperate with to address those issues and how they will cooperate with those bodies. The final section sets out the key outcomes of the cooperation process to date in relation to the strategic objectives of the draft Plan. Cooperation with those bodies will continue through to Examination.
- 1.3 A table of the main potential strategic cross boundary issues is set out in Appendix 1. Evidence of cooperation with prescribed bodies and neighbouring authorities on strategic cross boundary issues and other key issues where appropriate is provided in Appendix 2. As this document is intended to be updated through the plan making process space has been set aside to include representations received through the formal Regulation 19 consultation stage (Appendix 3). Appendix 3 also includes a cross reference to comments received to the 2021 consultation. Finally draft Statements of Common Ground (SoCG) and Memoranda of Understanding (MoU) are included at Appendix 4, with these being updated as they are prepared.

¹ [Planning and Compulsory Purchase Act 2004: Section 33A](#)

2. National Planning Policy Context

Localism Act 2011

2 Section 110² of the Localism Act, 'Duty to co-operate in relation to planning of sustainable development' outlines additional requirements to Section 33A of the Planning and Compulsory Purchase Act (2004). It outlines that Wiltshire Council, in the preparation of development plan documents, must cooperate with:

- Neighbouring local planning authorities;
- Other local planning authorities where sustainable development or use of land that has or would have a significant impact on at least two planning areas, including (in particular) sustainable development or use of land for or in connection with infrastructure that is strategic and has or would have a significant impact on at least two planning areas, and;
- Prescribed bodies that are considered to be most relevant to the preparation of any development plan document as defined in Part 2 of the Town and Country Planning (Local Planning) (England) Regulations 2012³. The bodies considered relevant for the preparation of the Wiltshire Local Plan Review include:
 - Environment Agency
 - Historic England
 - National Highways
 - Natural England
 - Homes England
 - NHS England

2.1 Wiltshire Council is also required to actively engage with the Swindon and Wiltshire Local Enterprise Partnership (SWLEP) regarding strategic matters in emerging development plans and where the delivery of key infrastructure projects, that require funding to assist in their deliverability, involves the SWLEP.

2.2 The council is also required to co-operate with the Local Nature Partnership and work collaboratively to deliver a strategic approach to encourage the delivery of meaningful biodiversity net gain in accord with the provisions of the Environment

² [Localism Act 2011 \(legislation.gov.uk\)](https://www.legislation.gov.uk)

³ [Town and Country Planning \(Local Planning\) \(England\) Regulations 2012: Part 2](#)

Act 2021⁴ However, within Wiltshire there is no established partnership, although work is progressing on developing a Local Nature Recovery Strategy with Swindon Borough Council.

- 2.3 Overall, the Localism Act requires that the council and prescribed bodies engage constructively and on an ongoing basis in relation to strategic matters.

National Planning Policy Framework (NPPF)

- 2.4 The NPPF⁵ sets out in paragraphs 24 to 27 that local planning authorities and county councils (in two-tier areas) are under a duty to cooperate with each other, and prescribed bodies on strategic matters that cross administrative boundaries. Strategic policy-making authorities should collaborate to identify the relevant strategic matters which they need to address in their plans.
- 2.5 They should also engage with their local communities and relevant bodies including Local Enterprise Partnerships and Local Nature Partnerships.
- 2.6 Effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy. In particular, joint working should help to determine where additional infrastructure is necessary, and whether development needs that cannot be met wholly within a particular plan area could be met elsewhere.
- 2.7 In order to demonstrate effective and on-going joint working, strategic policy making authorities should prepare and maintain one or more statements of common ground, documenting the cross-boundary matters being addressed and progress in cooperating to address these. These will be produced where necessary as the plan progresses.
- 2.8 These should be produced using the approach set out in national planning guidance and be made publicly available through the plan-making process to provide transparency.

⁴ [The Environment Act 2021 \(legislation.gov.uk\)](https://www.legislation.gov.uk)

⁵ [National Planning Policy Framework 2021](#)

Planning Practice Guidance

- 2.9 Planning Practice Guidance⁶ outlines that local planning authorities are required to produce a statement of common ground to report on how the authority has dispensed with their duty to cooperate. The guidance sets out what a statement of common ground is and what it is expected to contain.
- 2.10 A statement of common ground is a written record of the progress made by strategic policy-making authorities during the process of planning for strategic cross-boundary matters. It documents where effective co-operation is, and is not, happening throughout the plan-making process and is a way of demonstrating at examination that plans are deliverable over the plan period and based on effective joint working across local authority boundaries. In the case of local planning authorities, it also forms part of the evidence required to demonstrate compliance with the duty to cooperate.
- 2.11 The following must be contained within the statement of common ground:
- a. a short written description and map showing the location and administrative areas covered by the statement, and a brief justification for these area(s);
 - b. the key strategic matters being addressed by the statement, for example meeting the housing need for the area, air quality etc.;
 - c. the plan-making authorities responsible for joint working detailed in the statement, and list of any additional signatories (including cross-referencing the matters to which each is a signatory);
 - d. governance arrangements for the cooperation process, including how the statement will be maintained and kept up to date;
 - e. if applicable, the housing requirements in any adopted and (if known) emerging strategic policies relevant to housing within the area covered by the statement;
 - f. distribution of needs in the area, as agreed through the plan-making process, or the process for agreeing the distribution of need (including unmet need) across the area;
 - g. a record of where agreements have (or have not) been reached on key strategic matters, including the process for reaching agreements on these; and
 - h. any additional strategic matters to be addressed by the statement which have not already been addressed, including a brief description how the

⁶ Planning [Practice Guidance – Plan-Making](#) 2021

statement relates to any other statement of common ground covering all or part of the same area.

- 2.12 Wiltshire Council will produce statements of common ground where necessary outlining where cooperation with prescribed bodies and neighbouring planning authorities, over strategic matters, has been undertaken and how they are to be addressed to ensure the delivery of the Plan. It is anticipated that such documents will form part of the evidence that accompanies the Plan at the point of submission.

3. Strategic Context

Wiltshire

- 3 Wiltshire Council is one of the largest unitary authorities in England. The authority's area covers approximately 3,255 square kilometres and has a population of approximately 460,000 people. Wiltshire adjoins the higher tier local authorities of Dorset, Somerset, South Gloucestershire, Oxfordshire, West Berkshire, Hampshire, Swindon, and Bath and North East Somerset. The urban area of Swindon, which is predominately within Swindon Borough, has expanded into Wiltshire.
- 3.1 Wiltshire is largely rural, encompassing many natural and historic features which make it distinctive, including parts of three Areas of Outstanding Natural Beauty (AONB), part of the New Forest National Park, over 16,000 listed buildings, over 240 conservation areas and a World Heritage Site. Wiltshire also contains an area of the Western Wiltshire Green Belt which protects the openness of the countryside between Bath, Bradford-on-Avon and Trowbridge.
- 3.2 Deprivation is generally low, and Wiltshire's communities benefit from safe environments. Wiltshire enjoys subregional links and is within a commutable distance to London, Bristol, Swindon, South Wales and the south coast.

Local Plan Review

- 3.3 The primary purpose of the review of the Wiltshire Core Strategy is to assess the future need for housing and employment land in Wiltshire over the period 2020 to 2038 and to provide an appropriate basis for housing, employment land and infrastructure provision over that period. It will include considering if the existing adopted development strategy remains relevant, identifying new site allocations relating to housing and employment together with supporting services and infrastructure.
- 3.4 The scope of the review of the adopted Local Plan (the Wiltshire Core Strategy) will therefore be to: a) assess and address the future levels of need for new homes (including market, affordable and specialist housing; b) to assess and address the future employment land need; and c) provide a comprehensive

review of the adopted/saved development management policies within the current Local Plan and to ensure the plan policies are consistent with the National Planning Policy Framework.

- 3.5 The revised Local Plan will cover the period 2020 to 2038. It is important to note that the accommodation needs of the Gypsy and Traveller community is to be delivered through a separate Gypsy and Travellers Development Plan Document.

Neighbouring Authorities

- 3.6 Through the duty to cooperate the council has engaged with neighbouring local authorities from an early stage, and continues to do so, to discuss and establish strategic cross-boundary issues that may relate to the Wiltshire Local Plan review or any other respective Local Plan. There are 13 local planning authorities that border Wiltshire:

- Swindon Borough Council
- Cotswold District Council
- Oxfordshire County Council
- Vale of White Horse District Council
- West Berkshire Council
- Hampshire County Council
- Test Valley Borough Council
- New Forest District Council
- Dorset Council
- Somerset Council
- Bath and North East Somerset Council
- Gloucestershire County Council
- South Gloucestershire Council

- 3.7 The map below illustrates the local authorities that border Wiltshire and their geographical relationship.

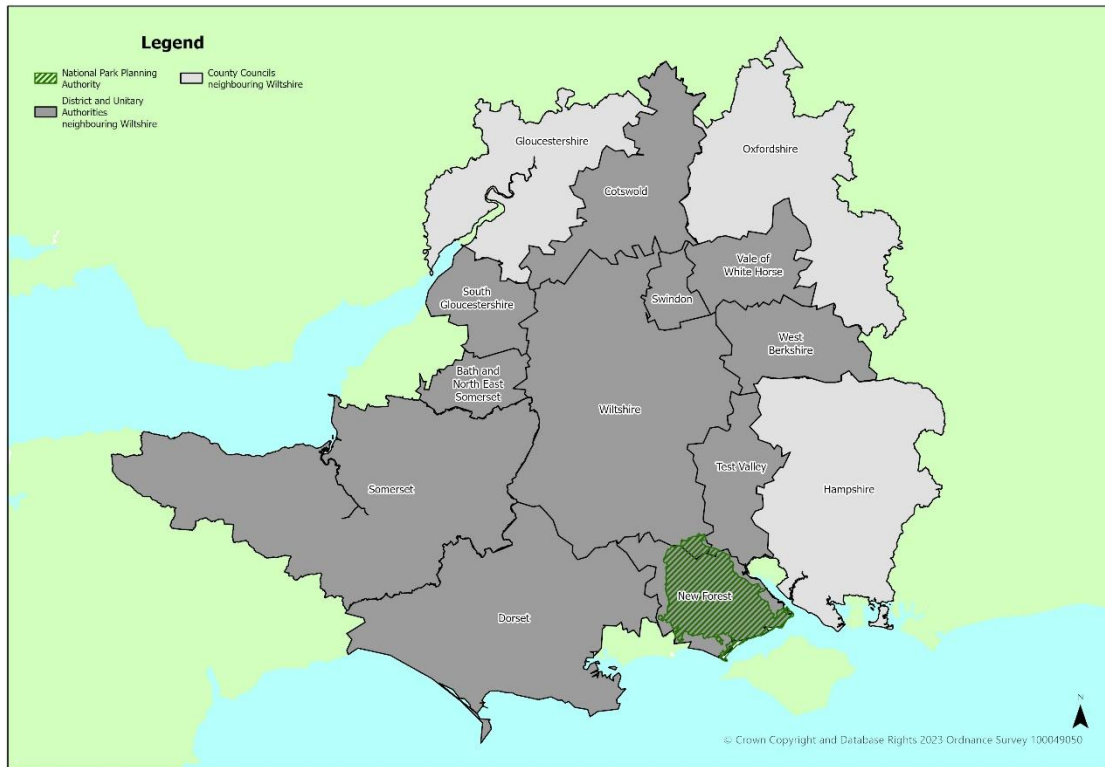


Figure 1: Map showing the current neighbouring local planning authorities in relation to Wiltshire Council

3.8 Since the review of the Local Plan began in 2017 local government reorganisation has seen Mendip, Sedgemoor, South Somerset, Somerset West and Taunton, and Somerset County Council form one new unitary authority on 1 April 2023, and Dorset Council become a unitary council on 1 April 2019, encompassing the former districts of Purbeck, East Dorset, North Dorset, West Dorset, Weymouth and Portland, and Dorset County Council. The former neighbouring district and county planning authorities can be seen in Figure 2 below.

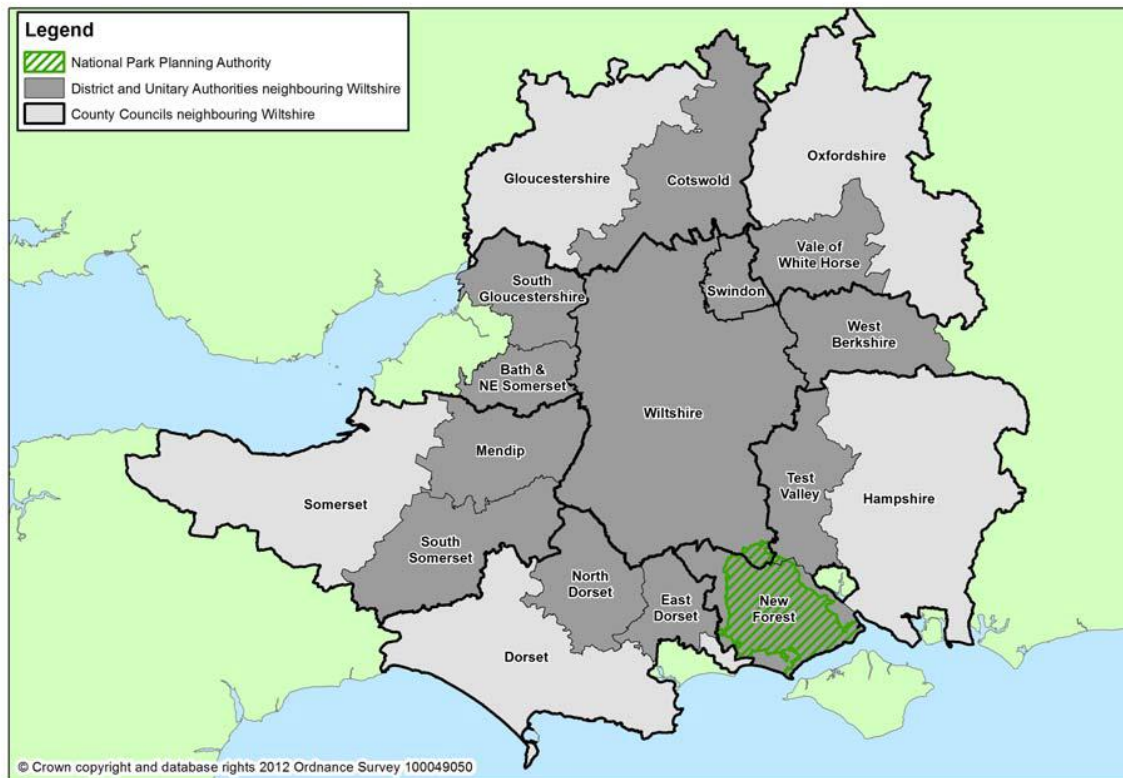


Figure 2: Map showing the authorities adjoining Wiltshire Council pre-Local Government reorganisation.

Partnerships

3.9 Along with the prescribed bodies set out in Part 2 of the Town and Country Planning (Local Planning) (England) Regulations 2012 and neighbouring authorities, the regulations also require the council to engage with Local Enterprise Partnerships and Local Nature Partnerships when preparing plans. The bodies relevant to Wiltshire Council are:

- Wiltshire and Swindon Local Enterprise Partnership⁷
- Cranborne Chase Area of Outstanding Natural Beauty (AONB), Cotswolds National Landscape AONB and North Wessex Downs AONB

3.10 Details on engagement with the Wiltshire and Swindon Local Enterprise Partnership can be found in Appendix 1 of this report.

⁷ [Swindon and Wiltshire Local Enterprise Partnership](#)

- 3.11 There has not been an active Local Nature Partnership since 2015 however from April 2023 Wiltshire Council is working with partners on a Local Nature Recovery Strategy for Wiltshire and Swindon.
- 3.12 There are three AONBs in Wiltshire as shown in Figure 3. The partnership boards for these AONBs have been consulted at all stages of plan preparation, and recent engagement has taken place with Cranborne Chase AONB on the policy for Dark Skies.

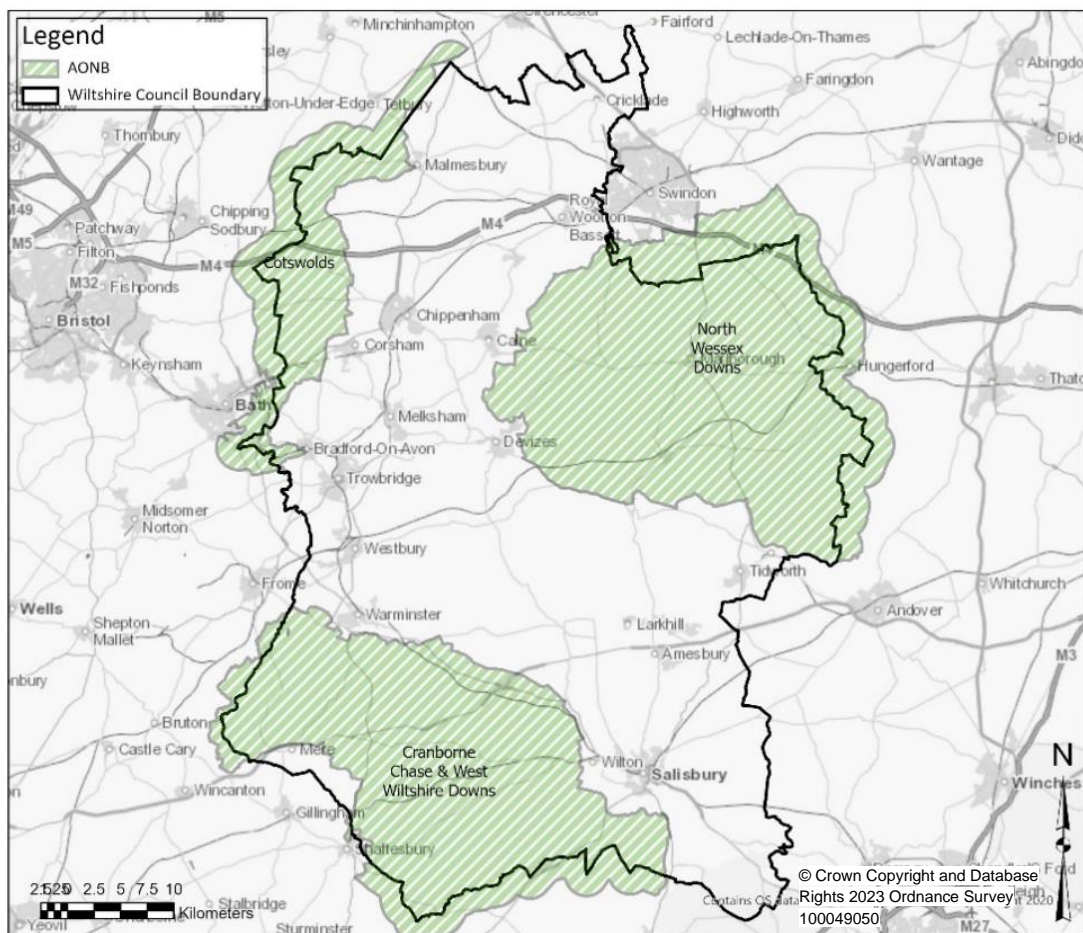


Figure 3: The three Areas of Outstanding Natural Beauty (AONBs) within Wiltshire.

Joint Working Groups

Hampshire Avon Working Group

- 3.13 The Council is also involved in the Hampshire Avon Working Group. A group that was formed to help deliver a package of mitigation for the increased levels of phosphates within the Hampshire-Avon river catchment, shown in Figure 4 and

to work jointly on associated matters. Prescribed bodies and neighbouring planning authorities that are represented in the group are:

- Natural England
- Environment Agency
- New Forest District Council
- New Forest National Park Authority
- Wessex Water
- Test Valley Borough Council
- Dorset Council
- Bournemouth, Christchurch and Poole Council

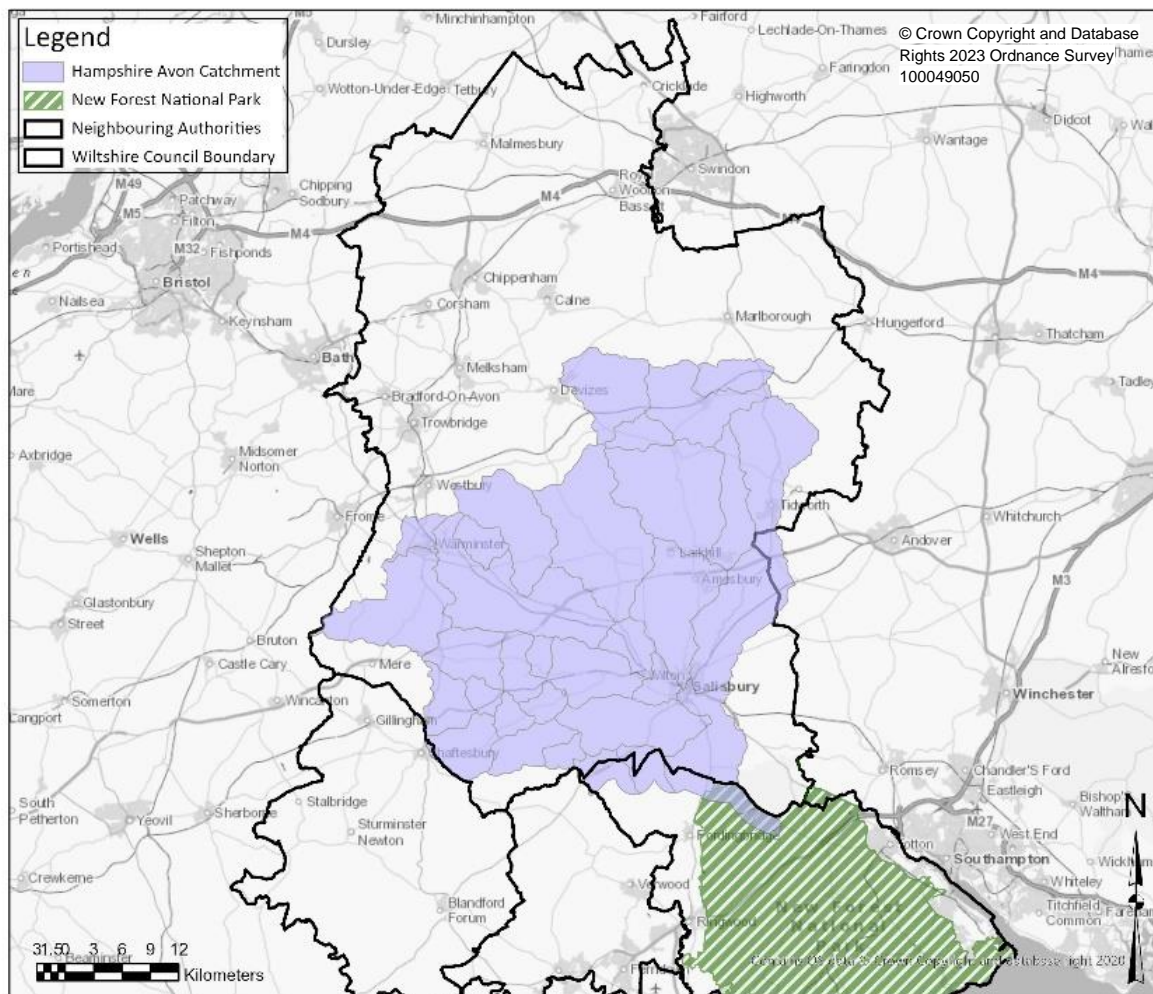


Figure 4: The local planning authorities involved in the Hampshire Avon Working Group

3.14 The council as Local Planning Authority is required under the Habitats Regulations to ensure that any adverse impacts arising from development can be mitigated to avoid harm to internationally important nature conservation sites, such as the River Avon, which are protected by law. This is at both the plan-making and decision-taking stage.

- 3.15 In 2018, a Memorandum of Understanding was signed between Wiltshire Council, New Forest District Council, New Forest National Park Authority, Natural England, Wessex Water and the Environment Agency in relation to the impact of phosphorus discharges from new development on the River Avon. The signatories agreed to deploy a range of measures to ensure development between March 2018 and March 2026 will be phosphorus neutral.
- 3.16 This work was superseded in March 2020 when Natural England formally advised affected Local Planning Authorities that all overnight development must achieve phosphorus neutrality prior to occupation. Following this, and a 9-month moratorium on housing growth, Wiltshire Council set up a strategic solution to address the phosphorus neutrality requirement.
- 3.17 In January 2021 Cabinet confirmed the council's strategic approach to securing phosphorus neutral development in the catchment area of the River Avon and agreed to ring fence and commit a sum of money from the Community Infrastructure Levy strategic funds to deliver mitigation measures to secure phosphorus neutral development in the period to 2026.
- 3.18 As part of the Local Plan Review evidence work, the nutrient neutrality strategy for the River Avon will be updated by the Council in consultation with Natural England. This work is still in progress and will be finalised and outlined in the forthcoming Statement of Common Ground with Natural England.

New Forest Project Steering Group

- 3.19 Joint working on the 'in-combination' recreational impacts arising from new development on the New Forest Special Area of Conservation, Special Protection Area and Ramsar sites is undertaken by Wiltshire Council with other authorities, led by the New Forest National Park Authority.
- 3.20 Wiltshire Council works with Bournemouth, Christchurch and Poole Council, Dorset Council, Eastleigh Borough Council, Natural England, New Forest District Council, New Forest National Park Authority, Southampton City Council and Test Valley Borough Council on mitigating the 'in-combination' recreational use impacts arising from new development that impacts on the New Forest Special Area of Conservation, Special Protection Area and Ramsar sites. A Memorandum of Understanding was drafted in August 2022 and 13.8km 'zone of influence', arising from a shared evidence base, was identified and agreed that would be used to ensure that additional recreational impacts arising from new residential and other forms of overnight accommodation development within respective

local planning areas are mitigated so that new development does not have an adverse impact on the New Forest Special Area of Conservation (SAC), Special Protection Area (SPA) and Ramsar sites.

- 3.21 Wiltshire Council's New Forest Mitigation Strategy is currently being reviewed and has recently been shared with Natural England. A statement of common ground will be developed as the Local Plan progresses.

4. Local Plan Strategic Objectives and Cross Boundary Matters

4 The strategic objectives for the Wiltshire Local Plan review are listed in the draft Local Plan as follows and are used to group cross boundary matters in this document:

- **Economic development** - Wiltshire needs to have a buoyant, resilient and 'green' local economy in order to boost the local economy and provide high quality, accessible employment opportunities. The Plan enables development to take place and encourages economic vitality, providing local jobs for Wiltshire's population. Residents within Wiltshire should have access to facilities and retail choice in convenient locations throughout Wiltshire. The Plan should strengthen the role and function of established town centres to secure their future vitality and viability. They should fulfil the roles appropriate to their sizes and the communities they serve and should complement one another. The potential of tourism should be realised as an economic sector, capitalising on the quality of the environment and location that the county benefits from.
- **Infrastructure** – Infrastructure requirements need to be appropriately planned, secured and implemented to ensure the timely delivery of development proposals.
- **Providing new homes** – To provide approximately 36,740 new homes in the right locations to meet objectively assessed needs through the plan period from 2020 to 2038. There should be an appropriate mix of types, sizes and tenures, particularly to address affordable housing needs, and will ensure a continuous supply of housing over the plan period that is aligned to job growth and the delivery of necessary infrastructure.
- **Planning for strong and healthy communities** – Wiltshire's communities should be enabled to help themselves and supported to improve their quality of life, lead healthier lifestyles and to foster a sense of community belonging, safety, social inclusion and self-sufficiency.
- **Climate change** – The Plan will help mitigate and adapt to climate change by contributing to the delivery of sustainable development and helping to ensure that communities are resilient to the unavoidable consequences of a changing climate.
- **Environmental quality** – New development will protect and enhance Wiltshire's natural, built and historic environment. This will include making effective use of land, enhancing biodiversity, embedding multi-functional and strategically linked green and blue infrastructure, meeting public open

space standards, improving water management and security, and conserving and enhancing features of historical, archaeological and cultural value alongside Wiltshire's landscape character. Development and construction will incorporate the principles of the circular economy, minimise its contribution to wasteful use of finite resources, and limit the persistent use of undegradable chemicals and materials.

- 4.1 Table 1 shows which prescribed bodies, neighbouring planning authorities and joint partnerships relate to each of the strategic objectives. A brief explanation of what joint working has included and will continue to take place is also included to show how the council effectively engage with those bodies.

Table 1: Local Plan review strategic objectives and partnership working in relation to the preparation of the Wiltshire Local Plan Review

Strategic Priorities	Partnerships	Joint Working - Evidence arrangements/agreements
<p>Economic Development</p>	<p>Wiltshire and Swindon Local Enterprise Partnership; Swindon Borough Council, Bath and North East Somerset Council, Mendip District Council, Cotswold District Council, Test Valley Borough Council, NHS England</p> <p>From the 1 April 2023 cross boundary working in this context will be with Somerset Council which has replaced Mendip District Council.</p>	<p>The key issues for Wiltshire were identified as being the level of housing and employment growth required to deliver new homes and jobs across Wiltshire over the plan period, and whether neighbouring authorities were planning to meet their own needs in their areas. The council has continued to engage with neighbouring authorities throughout the preparation of the Local Plan review and this process will continue with Statements of Common Ground being developed with neighbouring authorities where necessary.</p> <p>Early in the Local Plan process, Wiltshire Council worked jointly with Swindon Borough Council on a joint spatial framework and produced evidence documents with Swindon Borough Council. These include the Swindon and Wiltshire Local Housing Needs Assessment 2019, Swindon and Wiltshire Functional and Economic Market Assessment and the Strategic Housing Market Assessment (Volume 1). Subsequently, a Statement of Common Ground was prepared with Swindon Borough Council that outlined an understanding of the complementary nature of the Council’s respective Local Plans (see Appendix 3). Swindon Borough Council are now doing further evidence gathering to inform their Local Plan, prior to moving it to Regulation 19 stage.</p> <p>Regular meetings were set up between Wiltshire Council and NHS England and Wiltshire Clinical Commissioning Group (CCG) (superseded by the Integrated Care System) to discuss matters for delivering required health care infrastructure as part of the Local Plan review. The availability of NHS land that could be released for housing and employment uses were also discussed and this informed the site selection process. This engagement has also informed</p>

		<p>the Infrastructure Delivery Plan and methodology for developing housing requirements for the rural area.</p> <p>Wiltshire Council in partnership with Swindon Borough Council and the private sector form the Swindon and Wiltshire Local Enterprise Partnership (SWLEP). A statement of common ground between Wiltshire Council and SWLEP, will be prepared as part of the Wiltshire Local Plan review process, which will aim to gather support for the draft Plan from the partnership and set out the areas of agreement. SWLEP made comments on the Regulation 18 consultation which have been considered in the preparation of the draft Plan.</p>
Climate Change	Environment Agency, Natural England	<p>Statements of Common Ground will be prepared between Wiltshire Council and Natural England and the Environment Agency relating to matters that concern climate change. These matters include the sequential approach to planning for flood risk, taking into account the predicted effects of climate change, as well as development management policies that aim to reduce water consumption and maximise water reuse.</p> <p>Meetings, emails and telephone conversations have taken place with Natural England and the Environment Agency throughout the preparation of the Local Plan review as well as consultation on: Sustainability Scoping Report and Regulation 18 consultations. They will be invited to comment on the draft version of the Plan (Regulation 19). Further dialogue will be undertaken throughout the consultation and the lead-in to submission to resolve any issues raised.</p>
Providing new homes	Homes England; Swindon Borough Council, NHS England; Swindon Borough Council; Bath and North East	<p>See economic development above.</p> <p>Statements of Common Ground will be prepared with neighbouring authorities to establish an understanding of the levels of housing and employment growth being proposed within Wiltshire over the plan period, as well as in neighbouring authorities where appropriate.</p>

	Somerset Council; Test Valley Borough Council	Wiltshire Council have invited, and will continue to invite, comments throughout the preparation of the draft plan to ensure that neighbouring authority input has been consistent.
Planning for strong and healthy communities	Homes England, NHS England	<p>Meetings have been held with the Wiltshire Clinical Commissioning Group (CCG), now Integrated Care Board (ICB), to discuss access to healthcare facilities and infrastructure needs as part of planning for growth.</p> <p>Ongoing engagement with Homes England with the purpose of meeting constructively to identify opportunities for support to facilitate development that will enable the planned growth identified for Wiltshire to be achieved.</p>
Environmental Quality	Natural England, Historic England, Environment Agency	<p>Engagement with Natural England, Historic England and Environment Agency has taken place over the course of the preparation of the Local Plan review. Statements of Common Ground will be prepared for matters concerning both Wiltshire Council and the associated parties. These bodies have been consulted on a number of key documents in the Local Plan review process: Sustainability Scoping Report, Regulation 18 consultations. This will continue through the Regulation 19 consultation on the draft Local Plan and during the lead-in to the Examination.</p> <p>The Council has engaged constructively with Natural England on its review of the environment-based development management policies within the draft Plan to address issues such as biodiversity net gain, recreational pressures, bats, air quality, water quality, nutrients, and water resources management.</p> <p>Natural England and the Environment Agency are also a member of the Hampshire Avon Working Group where Wiltshire Council work in collaboration to address matters relating to nutrients within the Hampshire Avon River catchment.</p>

		<p>Meetings have been held with the Environment Agency to discuss issues of water scarcity and water resources and flood risk management. Meetings have also included Wessex Water where resource management were discussed, and the Council has effectively engaged with the water companies to understand where levels of growth may be impacted by water resource issues. This engagement has fed into the preparation of the draft Water Resources Management Plans covering Wiltshire and distribution catchments in 2022/2023.</p> <p>Meeting have been held to discuss responses to the Regulation 19 consultation and there has been ongoing engagement with Historic England on specific sites being considered for development within Wiltshire where there are heritage considerations.</p>
Infrastructure	National Highways, NHS England, Neighbouring Authorities	<p>A representative from National Highways works from Wiltshire Council offices on a regular basis to establish a more informal means of communication on all matters relating to National Highways.</p> <p>Liaison meetings take place with National Highways, involving Swindon Borough Council as appropriate to discuss respective Local Plans and wider transportation projects.</p> <p>Meetings will continue to be held with neighbouring authorities to discuss how cross-boundary public transport links can be improved to ensure the improvement of more sustainable modes of transport, this includes improving bus routes, cycle paths and public rights of way.</p>

4.2 Appendix 1 to this statement sets out an overview of the strategic partners and lists the potential strategic cross-boundary issues that could arise with the prescribed body and neighbouring planning authority.

4.3 In summary the key cross boundary strategic issues that are being addressed through the duty to cooperate process are as follows (please note this list is not exhaustive and information is also provided at Appendix 2):

- **Cross boundary local housing need and employment requirements.** This has included working with Swindon Borough Council, Test Valley Borough Council, Bath and North Somerset Council, Somerset Council and Dorset Council.
- Mitigation to offset **recreation disturbance from new development on New Forest ecological designations.** There is a New Forest Recreational Mitigation Strategy in place to address cross boundary matters, which is being reviewed (see Appendix 2). This has involved joint working with Bournemouth, Christchurch and Poole Council, Dorset Council, Eastleigh Borough Council, Natural England, New Forest District Council, New Forest National Park Authority, Southampton City Council and Test Valley Borough Council.
- Other projects related to the **mitigation of impacts on Special Areas of Conservation (SAC) including impacts on protected bats** associated with the Bath and Bradford on Avon SAC has involved working with Natural England and Bath and North East Somerset Council.
- Ensuring that future development helps **address and manage phosphate levels in the Hampshire Avon**, its tributaries and surrounding catchment area. This involves joint working with Natural England, Environment Agency, New Forest District Council, New Forest National Park Authority, Wessex Water and other authorities.
- **Impact on and improvements to the strategic road network** including on the M3 and M5 and Junction 16 of the M4 is being discussed with National Highways, Swindon Borough Council and Test Valley Borough Council.

5. Addressing strategic cross boundary issues.

- 5 The council has worked constructively with its duty to cooperate partners and other relevant bodies throughout the preparation of the draft Local Plan, building on existing working relationships and arrangements for engagement. This engagement is ongoing.
- 5.1 The emphasis of the engagement with prescribed bodies and neighbouring authorities has been on seeking to achieve effective and deliverable policies in the draft Local Plan that provide land and infrastructure to support current and projected levels of objectively assessed need, whilst also considering the needs of neighbouring authorities.
- 5.2 Cooperation and engagement with prescribed bodies and neighbouring authorities has been iterative and continuous throughout the plan-making process, especially at key stages (Regulation 18 and 19). The council has employed a range of positive and constructive methods which were appropriate and proportionate to the strategic matters/issues that needed consideration through dialogue. Through joint working the emphasis has been to try to secure the most effective outcomes for the parties involved. The approaches listed below were used as mechanisms for engagement. The mechanism that was used depended upon the nature of the issue and the partners involved.
- Meetings
 - Working Groups
 - Written exchange
 - Memoranda of Understanding
 - Statements of Common Ground (ongoing method that will be used throughout the plan making process where appropriate)
 - Other joint working mechanisms
- 5.3 Partnership arrangements have been fit for purpose for a number of years and were agreed with the relevant strategic partners to ensure that cooperation has led to positive outcomes for all parties involved. In seeking to produce effective and deliverable policies on strategic cross boundary matters, the council has sought to:
- Align planning policies with those of neighbouring local planning authorities.
 - Prepare mutually beneficial evidence.
 - Prepare strategic management plans that address cross-boundary issues

6. Conclusion and Key Outcomes

- 6 The Local Plan Review has been in preparation since 2017 when the initial Regulation 18 consultation was undertaken. It is important to emphasise that it is a review of the extant Local Plan – the adopted Wiltshire Core Strategy (2015) and, as such, it carries forward the existing spatial strategy. As such, the main strategic issues to be addressed through the review include relating to managing the supply of new homes and jobs, or environmental matters such as: phosphate neutrality, addressing nitrates, water resource management and conserving and enhancing biodiversity and nationally important landscapes. Some of these matters have existing agreements and/or partnerships in place with statutory bodies and neighbouring authorities. That said, for the purposes of progressing the draft Plan it has been important to maintain constructive dialogue with interested parties and this will continue through and beyond the Regulation 19 consultation.
- 6.1 Since the initial Regulation 18 consultation in 2017 there has been several rounds of informal consultation with town and parish councils on how the needs of the county are to be met within the context of the existing strategy for managing growth. In 2021 there was a wider Regulation 18 consultation exercise focusing on key elements of what would eventually become the Regulation 19 'Publication version' of the draft Plan. Throughout these episodes of engagement, dialogue with prescribed bodies and neighbouring planning authorities has been maintained to ensure that all interested parties have had opportunities to be briefed on and help inform the content of the draft Plan.
- 6.2 Before the draft Plan is submitted for Examination, further dialogue with prescribed bodies and neighbouring authorities will be undertaken and this will be reported through an update to this statement. As the Council progresses towards the independent Examination process, Statements of Common Ground will be updated and, where possible, finalised to assist the appointed Inspector and all parties invited to participate in the Examination in Public. Again, a record of these will be added to the review of this statement in due course.

Appendix 1: Duty to Cooperate bodies and potential strategic cross-boundary issues

Duty to Cooperate Body/ Neighbouring Authority	Potential Strategic Interest
Bath and North East Somerset Council	Housing and employment development Highway and transport infrastructure e.g. M4, A4, A36 Bath and Bradford-on-Avon Bats Special Area of Conservation (SAC) Kennet and Avon Canal Green Belt
Cotswold District Council	Housing and employment development Highway and transport infrastructure e.g. A419/A417 Kemble Airfield North Meadows and Clattinger Farm Special Area of Conservation (SAC)
Dorset County Council From 1 April 2019 Dorset County Council has combined with the former districts of Purbeck, East Dorset, North Dorset, West Dorset, and Weymouth and Portland to become Dorset Council	Highway and transport infrastructure e.g. A350 and the Shaftesbury Bypass Education
East Dorset District Council From 1 April 2019 East Dorset District Council has been encompassed within the unitary Dorset Council	Highway and transport infrastructure e.g. A350 and the Shaftesbury Bypass Education

Environment Agency	River Avon water quality Flood and surface water drainage
Gloucestershire County Council	Housing and employment development Highway and transport infrastructure e.g. A419/A417
Hampshire County Council	Housing and employment development Highway and transport infrastructure e.g. A303 Development at Ludgershall
Historic England	Heritage assets Stonehenge, Avebury and associated sites World Heritage Site
National Highways (previously Highways England)	Housing and employment development Highway and transport infrastructure e.g. M4 Junctions 16 and 17, A36 and A303
Homes England	Housing development
Oxfordshire County Council	Highway and transport infrastructure e.g. A361 Wiltshire, Swindon and Oxfordshire Canal Partnership Wilts and Berks Canal
Mendip District Council From 1 April 2023 ¹⁹ Mendip District Council has been encompassed within the unitary Somerset Council	Housing and employment development Highway and transport infrastructure e.g. A361, A36 Green Belt

<p>Natural England</p>	<p>Habitat Regulations Assessment Designated ecological sites, protected species and habitats: Including River Avon water quality; New Forest protected sites; and North Meadows and Clattinger Farm SAC Strategic landscape designations Public rights of way Green infrastructure Air quality</p>
<p>New Forest District Council</p>	<p>Housing development Recreational impacts on New Forest protected sites River Avon water quality Air Quality</p>
<p>New Forest National Park Authority</p>	<p>Housing need Recreational impacts on New Forest protected sites River Avon water quality Air quality</p>
<p>NHS England</p>	<p>Healthcare capacity Housing development</p>
<p>North Dorset District Council From 1 April 2019 North Dorset District Council has been encompassed within the unitary Dorset Council</p>	<p>Housing and employment development Highway and transport infrastructure e.g. A350 and the Shaftesbury Bypass</p>

<p>Somerset County Council From 1 April 2023 Somerset County Council has combined with the former districts of Mendip, Sedgemoor, South Somerset, and Somerset West and Taunton to become Somerset Council.</p>	<p>Housing and employment development Highway and transport infrastructure e.g. A303, A361</p>
<p>South Gloucestershire Council</p>	<p>Housing and employment Highway and transport infrastructure e.g. M4 Green Belt</p>
<p>South Somerset District Council From 1 April 2023 South Somerset has been encompassed within the unitary Somerset Council.</p>	<p>Housing and employment</p>
<p>Swindon and Wiltshire Local Enterprise Partnership</p>	<p>Business investment and economic growth</p>
<p>Swindon Borough Council</p>	<p>Housing and employment development (incl. at Royal Wootton Bassett, west Swindon) Education Highway and transport infrastructure e.g. M4 (incl. J16) Wiltshire, Swindon and Oxfordshire Canal Partnership, Wiltshire and Berkshire Canal North Meadows and Clattinger Farm Special Area of Conservation (SAC)</p>
<p>Test Valley Borough Council</p>	<p>Housing and employment development Highway and transport infrastructure Development at Ludgershall</p>

Vale of White Horse District Council	Highway and transport infrastructure Wiltshire, Swindon and Oxfordshire Canal Partnership Wilts and Berks Canal
West Berkshire Council	Highway and transport infrastructure e.g. A4 Kennet and Avon Canal

Appendix 2: Evidence showing how duty to cooperate has been implemented with specific organisations on key strategic issues, listed by Local Plan objective

Local Plan Objective	Prescribed Body or Neighbouring Authority	Why engaged?	Cross boundary issue	How engaged?	When engaged?	Key outcomes
Economic development objective	Swindon and Wiltshire Local Enterprise Partnership	<p>To facilitate development to enable the economic growth identified for Wiltshire in the Local Plan review.</p> <p>As a partner of the SWLEP, Wiltshire Council has worked collaboratively with its partners to support economic</p>	Economic growth	<p>Consultation exercises and events</p> <p>Meetings</p> <p>Email correspondence</p>	<p>During the preparation of the Local Plan Review: 2017 to 2023</p> <p>Meetings of the Local Enterprise Partnership 2017 to 2023</p> <p>Response to Regulation 18 consultation 2021- Comments received on the Emerging Spatial</p>	Ongoing collaboration.

Local Plan Objective	Prescribed Body or Neighbouring Authority	Why engaged?	Cross boundary issue	How engaged?	When engaged?	Key outcomes
		growth across Swindon and Wiltshire.			Strategy and Empowering Rural Communities documents.	
Economic development objective Housing objective Infrastructure objective	Swindon Borough Council SWLEP Cotswold District Council	To consider and, where appropriate, collaborate on cross-boundary issues to ensure a collaborative approach to plan preparation.	Local housing need Employment requirements Transport issues particularly relating to the M4 and Junction 16	Consultation exercises and events Regular meetings are held with Swindon Borough Council including through partnership working on the SWLEP. Meetings have been held with Swindon Borough Council and Cotswold District Council.	During the preparation of the Local Plan Review: 2017 to 2023	A Statement of Common Ground was signed by Wiltshire Council and Swindon Borough Council in 2020. (See Appendix 4) Ongoing dialogue. Further work is needed on transport implications for each authority respective plan with National Highways. Swindon Borough Council's timeline behind Wiltshire. Education to be discussed in relation to Swindon's Local Plan.

Local Plan Objective	Prescribed Body or Neighbouring Authority	Why engaged?	Cross boundary issue	How engaged?	When engaged?	Key outcomes
				Contributed to Local Economic Assessment.		
Environmental quality objective	Swindon Borough Council Cotswold District Council Natural England	To consider and, where appropriate, collaborate on cross-boundary issues to ensure a collaborative approach to plan preparation.	North Meadow Special Area of Conservation (SAC) mitigation	Joint working on North Meadow SAC mitigation strategy with Swindon Borough Council and Cotswold District Council including joint commissioning of evidence.	Joint working commenced in 2021	The North Meadow and Clattinger Farm SAC Interim Recreation strategy is being put in place.
Environmental quality objective	Hampshire Avon Working Group including: Natural England	To consider and, where appropriate, collaborate to ensure phosphate issues on the Hampshire	Mitigation for water quality and nutrient enrichment on the Hampshire Avon	Regular meetings are through partnership working in the Hampshire Avon Working Group.	During the preparation of the Local Plan Review 2017 to 2023	There is a Memorandum of understanding and on-going work in place - see paragraphs 3.13-3.18 of this document.

Local Plan Objective	Prescribed Body or Neighbouring Authority	Why engaged?	Cross boundary issue	How engaged?	When engaged?	Key outcomes
	<p>Environment Agency</p> <p>New Forest District Council</p> <p>New Forest National Park Authority</p> <p>Wessex Water</p>	Avon are addressed				
Environmental quality objective	<p>New Forest District Council</p> <p>New Forest National Park Authority</p> <p>Natural England</p> <p>Bournemouth, Christchurch</p>	To ensure the plan protects the natural environment.	Mitigation to offset recreation disturbance from new development on New Forest ecological designations.	Regular meetings between New Forest District Council, New Forest National Park Authority and other relevant authorities.	During the preparation of the Local Plan Review: 2017 to 2023	<p>A memorandum of understanding was agreed between all parties in August 2022 to clarify work to date.</p> <p>There have been ongoing efforts and agreement regarding appropriate mitigation to offset recreational disturbance from new development against</p>

Local Plan Objective	Prescribed Body or Neighbouring Authority	Why engaged?	Cross boundary issue	How engaged?	When engaged?	Key outcomes
	<p>and Poole Council</p> <p>Dorset Council</p> <p>Eastleigh Borough Council</p> <p>Southampton City Council</p> <p>Test Valley Borough Council</p>					<p>New Forest international ecological designations. In 2022 a Zone of Influence (13.8km) was established as a result of joint work.</p> <p>The New Forest Recreational Mitigation Strategy is being reviewed with Natural England.</p> <p>A statement of common ground will be produced.</p>
Environmental quality objective	<p>Bath and North East Somerset Council</p> <p>Natural England</p>	To ensure the plan protects the natural environment and biodiversity.	Mitigation to offset impact on development on protected bat species: Bath and Bradford-on-Avon SAC	<p>Meetings</p> <p>Email correspondence</p>	During the preparation of the Local Plan Review: 2017 to 2023	<p>Established guidance.</p> <p>A Trowbridge Bat Mitigation Strategy was published as part of the Wiltshire Housing Site Allocations Plan. This is</p>

Local Plan Objective	Prescribed Body or Neighbouring Authority	Why engaged?	Cross boundary issue	How engaged?	When engaged?	Key outcomes
						being reviewed with Natural England.
Economic development objective Infrastructure objective	Bath and North East Somerset Council	To consider and, where appropriate, collaborate on cross-boundary issues to ensure a collaborative approach to plan preparation.	Local housing need Employment requirements	Consultation exercises and events Meetings Email correspondence	During the preparation of the Local Plan Review: 2017 to 2023	<p>Bath and North East Somerset Council support an increase in employment and self-containment at both Trowbridge and Chippenham.</p> <p>A statement of common ground was produced for the Bath and North East Somerset Council Local Plan Partial Update (LPPU) in 2021. A SoCG on the Local Plan review will be produced as the Wiltshire Local Plan progresses.</p> <p>Engagement has also taken place through</p>

Local Plan Objective	Prescribed Body or Neighbouring Authority	Why engaged?	Cross boundary issue	How engaged?	When engaged?	Key outcomes
						BANES on the West of England Joint Spatial Plan that is no longer being progressed.
Infrastructure objective	South Somerset (Somerset Council from April 2023)	To consider and, where appropriate, collaborate on cross-boundary issues to ensure a collaborative approach to plan preparation.	Improvements to the strategic road network on the M3 and M5.		During the preparation of the Local Plan Review: 2017 to 2023	South Somerset District Council are supportive of improvements to the strategic road network between the M3 and the M5.
Economic development objective	Cotswold District Council	To consider and, where appropriate, collaborate on cross-boundary issues to ensure a	Kemble Airfield.	Meetings	During the preparation of the Local Plan Review: 2017 to 2023	Cotswold District Council are supportive of the Council's approach to Kemble Airfield.

Local Plan Objective	Prescribed Body or Neighbouring Authority	Why engaged?	Cross boundary issue	How engaged?	When engaged?	Key outcomes
		collaborative approach to plan preparation.				
Economic development objective Infrastructure objective	Test Valley Borough Council Hampshire County Council	To consider and, where appropriate, collaborate on cross-boundary issues to ensure a collaborative approach to plan preparation.	Development at Ludgershall and impact on highways and other infrastructure.	Meetings	During the preparation of the Local Plan Review: 2017 to 2023	Development potential at Ludgershall, including: highways and access considerations (into Hampshire); electricity network supplies; secondary education capacities at Wellington Academy; joint meeting with Network Rail and MOD to explore access over railway.
Infrastructure objective	Dorset Council	To consider and, where appropriate, collaborate on cross-boundary	Improvements to the strategic road network, Shaftesbury Bypass	Email correspondence	From April 2019	Agreed that policy on the Shaftesbury bypass (saved policy TR20) could be deleted. Policy 74 Strategic Transport Network in the Wiltshire

Local Plan Objective	Prescribed Body or Neighbouring Authority	Why engaged?	Cross boundary issue	How engaged?	When engaged?	Key outcomes
		issues to ensure a collaborative approach to plan preparation.				Local Plan provides for improvements to the strategic road network.
Economic development objective	West Berkshire	To consider and, where appropriate, collaborate on cross-boundary issues to ensure a collaborative approach to plan preparation.	Employment land - shortfall in West Berkshire	Meetings and response to consultation	Early 2023	Response to West Berkshire Regulation 19 consultation setting out reasons why a shortfall employment land in West Berkshire could not be met within Wiltshire.
Providing new homes objective	Homes England (Previously the Homes and		Housing policy and delivery	Meetings (Housing Partnership)	During the preparation of the Local Plan Review: 2017 to 2023	Ongoing dialogue

Local Plan Objective	Prescribed Body or Neighbouring Authority	Why engaged?	Cross boundary issue	How engaged?	When engaged?	Key outcomes
	Communities Agency)					
Planning for strong and healthy communities objective	NHS England, Integrated Care Board	To ensure that new health facilities to support levels of growth in the county are delivered and planned for appropriately.	Health facility provision	Consultation Meetings Emails	During the preparation of the Local Plan Review: 2017 to 2023	A Statement of Common Ground will be prepared. Discussion on updates to the CCG Estates Strategy on brownfield land. Feedback was shared and sought on emerging housing numbers for small villages, which informed the methodology.
Climate change objective	Environment Agency	To ensure the plan protects and reduces the risk to both existing and future	Flood risk management	Formal and Informal consultations Meetings	During the preparation of the Local Plan Review – 2017 – 2023	Comments were responded to and as a result: <ul style="list-style-type: none">• Amendments made to the flood risk policies in the Plan.

Local Plan Objective	Prescribed Body or Neighbouring Authority	Why engaged?	Cross boundary issue	How engaged?	When engaged?	Key outcomes
Environmental quality objective		residents and their properties as well as enhance water courses through natural flood risk management.		Joint Working Group Emails	Regulation 18 consultation 2021 - Comments received on the Emerging Spatial Strategy, preferred site options and Addressing Climate change. Discussion of January 2021 consultation response and next steps for the revised spatial strategy, site allocations and policy review	<ul style="list-style-type: none"> Changes made to site proposals within the Plan. A Statement of Common Ground is being prepared.

Local Plan Objective	Prescribed Body or Neighbouring Authority	Why engaged?	Cross boundary issue	How engaged?	When engaged?	Key outcomes
					Comments received on the draft Revised Spatial Strategy and preferred site options.	
Climate change objective Environmental quality objective	Natural England	To ensure the plan minimises landscape impact and protects the natural environment.	Site specific issues Cotswold Water Park Habitats Regulations Assessment (HRA) and associated sites	Formal and informal consultations Meetings Joint Working Groups Emails	During the preparation of the Local Plan Review: 2017 to 2023 Regulation 18 consultation 2021 – comments received on Emerging Spatial Strategy, potential development	Comments were responded to and as a result: <ul style="list-style-type: none"> • Amendments were made to site proposals in the Plan • Policies were reworded as part of the policy review of the Plan A Statement of Common Ground is being prepared.

Local Plan Objective	Prescribed Body or Neighbouring Authority	Why engaged?	Cross boundary issue	How engaged?	When engaged?	Key outcomes
					<p>sites, Empowering Rural Communities paper, Addressing Climate Change paper and HRA scoping report.</p> <p>Discussion on representation from January 2021 and next steps</p> <p>Comments on draft Revised Spatial Strategy and preferred site options</p>	<p>Agreed policy approach in principle for the Cotswold Water Park SSSI.</p>

Local Plan Objective	Prescribed Body or Neighbouring Authority	Why engaged?	Cross boundary issue	How engaged?	When engaged?	Key outcomes
					Discussion about a suitable approach to planning policy at Cotswold Water Park SSSI.	
Environmental quality objective	Historic England	To ensure the plan proposals protect the historic environment	Site specific issues Stonehenge, Avebury and Associated Sites World Heritage Site	Consultation exercises and events Meetings Emails	During the preparation of the Local Plan Review: 2017 to 2023 Regulation 18 consultation 2021 – comments on the Emerging Spatial Strategy, potential	Comments were responded to and as a result: amendments made to site proposals in the Plan; and policies reworded as part of the policy review. Supportive of identification and allocation of brownfield sites in historic settlements where account is taken of the

Local Plan Objective	Prescribed Body or Neighbouring Authority	Why engaged?	Cross boundary issue	How engaged?	When engaged?	Key outcomes
					<p>development sites</p> <p>Discussion on representation from January 2021 and the next steps.</p> <p>Sites and relating evidence were shared with Historic England, giving them opportunity to comment.</p>	<p>character and identity places.</p> <p>A Statement of Common Ground will be prepared.</p> <p>Historic England provided feedback on certain sites and as a result further work was carried out on proposals and a site was removed from the site selection process.</p> <p>Ongoing cooperation with Historic England on the Stonehenge, Avebury and Associated Sites World Heritage and the drafting of Policy 100.</p>

Local Plan Objective	Prescribed Body or Neighbouring Authority	Why engaged?	Cross boundary issue	How engaged?	When engaged?	Key outcomes
Infrastructure objective	National Highways (formerly Highways England)	To work together to identify opportunities to facilitate development to enable the economic growth identified for Wiltshire	Strategic road network improvements.	Consultation exercises and events Meetings Emails	During the preparation of the Local Plan Review: 2017 to 2023 Regulation 18 consultation 2021: comments received on Emerging Spatial Strategy, Chippenham, Royal Wootton Bassett, Salisbury, Amesbury and the Transport Review (January 2021) Meetings during 2022, 2023 between	Comments were responded to and as a result: Amendments made to site proposals in the draft Plan; Policies were reworded as part of the policy review. A Statement of Common Ground will be prepared.

Local Plan Objective	Prescribed Body or Neighbouring Authority	Why engaged?	Cross boundary issue	How engaged?	When engaged?	Key outcomes
					Council and National Highways where updates were discussed.	

Appendix 3: Consultation Responses from Prescribed Bodies and Neighbouring Planning Authorities

- A.1 Consultation responses from Prescribed Bodies and Neighbouring Planning Authorities to the Regulation 18 consultation on the review of the Local Plan can be found within pages 8-128 of the Wiltshire Council Local Plan Review Consultation January-March 2021 Consultation Report and Next Steps⁸.
- A.2 Consultation responses from Prescribed Bodies and Neighbouring Planning Authorities to the Regulation 19 consultation on the review of the Local Plan will be added following the close of the consultation.

⁸ Wiltshire Local Plan Review Consultation January-March 2021 Consultation Report and Next Steps: https://www.wiltshire.gov.uk/media/7226/Local-Plan-Review-consultation-statement-2021-final/pdf/LPR_2021_consultation_statement_lpr_jan_mar_2021.pdf?m=637673811404070000

Appendix 4: Memoranda of understanding and statements of common ground

Extract from:

'STRATEGIC APPROPRIATE ASSESSMENT OF DEVELOPMENTS IN WILTSHIRE OCCURRING [sic] IN THE RIVER AVON SAC CATCHMENT' (16 March 2023)

This sets out the latest joint working position on phosphorus neutrality

PHOSPHORUS NEUTRALITY

Memorandum of Understanding

The implications of development related phosphorus inputs have been assessed through appropriate assessments for the Wiltshire Core Strategy⁶ and Wiltshire Housing Site Allocations Plan. The latter plan relies on a Memorandum of Understanding (MoU)⁷ between Wiltshire Council, New Forest District Council, New Forest National Park Authority, Natural England, Wessex Water and the Environment Agency. The signatories have agreed to deploy a range of measures to ensure development between March 2018 and March 2026 will be phosphorus neutral.

Interim Delivery Plan

The MoU commits the parties to preparing an Interim Delivery Plan (IDP)⁸ in order to secure a trajectory of phosphorus reductions in line with the spatial and temporal pattern of development. The IDP focuses mainly on residential development down to single dwellings, as these combine to have the greatest negative effects across the catchment. Although it also captures anticipated increases in phosphorus from new employment uses, it is likely the proportion of householders living and working in the catchment is roughly the same and therefore accounting for these applications separately would be double counting phosphorus loads. This approach is consistent with Natural England updated advice on nutrient neutrality requirements in the River Avon catchment (March 2022)⁹. In addition to residential growth the IDP considers the growth of unsewered development and takes account of land use change from agriculture to urban to arrive at a projection for net phosphorus increases up to 2025/26.

Industries which contribute phosphorus as a result of their commercial processes (e.g. laundries, car washes, fish farms, water cress farms, tourism attractions and some agricultural facilities), do not come within the scope of this appropriate assessment and will continue to need to be assessed separately. In addition, commercial development involving overnight accommodation such as self-service and serviced tourist / business accommodation, caravans and chalets etc, will attract people into the catchment and generate additional wastewater. This will therefore be assessed on a case by case basis and developers are likely to require advice from Natural England through their chargeable services (DAS).

Footnotes:

6 This relied on the River Avon Special Area of Conservation Nutrient Management Plan for Phosphorus, Final version April 2015. Prepared by David Tyldesley and Associates for Wiltshire Council, Natural England and the Environment Agency.

7 Memorandum of Understanding, River Avon Special Area of Conservation, Phosphate Neutral Development – Interim Mitigation, 29 May 2018

8 River Avon SAC – Phosphate Neutral Development Interim Delivery Plan, Wood Environment and Infrastructure Solutions UK Limited, January 2019

9 Natural England Guidance Documents from March 2022 are available on our website Phosphorus and nitrogen mitigation - Wiltshire Council

Outcome Delivery Incentive

When written, the IDP envisaged the entire load would be offset by a performance commitment (Outcome Delivery Incentive - ODI) which was being sought by Wessex Water through the water company Price Review (PR19). They committed to maintain phosphorus during the period 2020 – 2025 at the level of the previous 5 years. If this had been agreed by Ofwat, the IDP would have acted as a contingency to the ODI not being implemented, as well as to cover unsewered development and as a precaution to cover all new development between March 2018 and March 2020. Although Ofwat agreed the principle of the ODI, it did not consider it should be funded entirely by water customers. As a result, third parties including the Councils need to provide for offsetting for developments to be able to proceed.

Wessex Water assessed how much of the incentive would be delivered over the business plan period up to 2025. Over this period, it expected to deliver a programme of optimising sewage treatment works in anticipation of agreeing lower phosphorus limits with Ofwat for the next Asset Management Plan period. For example, Wessex Water have confirmed the Environmental Permit for Warminster Sewage Treatment Works has been reduced from 1mg/l down to 0.5 mg/l from 31st March 2022 effectively halving the mitigation needed for development discharging to these works. The company also anticipates purchasing offsets for a number of environmental parameters through an online trading platform operated by Entrade. Provided the phosphorus element of these credits can be demonstrated to operate in perpetuity then they may be available for councils to use towards mitigation for housing but at the current time details remain uncertain. For the foreseeable future, however, local authorities will need to ensure offsetting is provided.

To this end Wiltshire Council has agreed, unless it becomes evident that this responsibility falls to others, to provide for the in-perpetuity mitigation for unmitigated permissions it grants under the Wiltshire Core Strategy up to March 2026. The Council reserves the right to require developers to directly provide for the necessary mitigation measures where it considers it is appropriate to do so. The other MoU councils are supportive of this approach.

Wiltshire Council has been using the Natural England's updated methodology (March 2022) to calculate the phosphorus burdens from new development in the Hampshire Avon catchment and deliver the in-perpetuity mitigation necessary. This approach supersedes the calculations included in the IDP.

Natural England issued guidance in 2020 and this has recently been updated in March 2022. The 2020 methodology has been used to calculate phosphorus burdens from 2018 to March 2020. Wiltshire Council has agreed with Natural England to apply the updated 2022 methodology to all development from April 2020 onwards.

Beyond 2025

Beyond the IDP, signatories to the MoU recognise development must continue to be phosphorus neutral, potentially for the lifetime of the permissions being granted. To the extent that housing distribution is down to planning authorities, the councils recognise they have a role to play in directing housing away from sensitive areas, and where this is not possible, finding appropriate mechanisms to offset harm.

Water usage condition

The MoU and IDP currently commits planning authorities to imposing a condition on all residential permissions in the catchment area to restrict water usage to 110 litres per person per day. This will have the effect of slightly reducing the amount of water reaching sewage treatment works. Most treatment works are restricted through their Environmental Permit on the amount of phosphorus that can be discharged per litre of water. The water use restriction will thereby achieve a reduction in total phosphorus discharged and reduce the offsetting by a small degree

River Avon SAC Working Group

In order to track phosphorous neutrality in the short term and plan for the longer term, representatives of the MoU signatories meet regularly as the River Avon SAC Working Group. The group tracks progress of delivery measures funded by local authorities, Wessex Water and developers, monitoring these against forecasts of housing delivery (housing trajectories) and annual returns of housing completions.

The Working Group also provides a forum for statutory agencies to advise on the implications of the growing scientific evidence which underpins the delivery of phosphorus neutral development, work being undertaken nationally to address nutrient impacts and in due course on the steps being taken to bring the SAC into favourable condition.

At least one full meeting will be held every year in late November / early December when new trajectory data is available. This annual review will assess progress on delivering phosphorus offsetting in relation to current trajectories of housing from Wiltshire Council.

Memorandum of Understanding
New Forest Special Area of Conservation, Special Protection Area
and Ramsar sites
‘In-combination’ recreational impacts arising from new development

This Memorandum of Understanding is made between the following parties:

- Bournemouth, Christchurch and Poole Council
- Dorset Council
- Eastleigh Borough Council
- Natural England
- New Forest District Council
- New Forest National Park Authority
- Southampton City Council
- Test Valley Borough Council
- Wiltshire Council

It describes how each planning authority within the identified 13.8km ‘zone of influence’ will ensure that additional recreational impacts arising from new residential and other forms of overnight accommodation development within their planning area are mitigated so that new development does not have an adverse impact on the New Forest Special Area of Conservation (SAC), Special Protection Area (SPA) and Ramsar sites. This will allow new development to progress.

1. Introduction

- 1.1 In 2018 six local planning authorities (Eastleigh Borough Council, New Forest District Council, New Forest National Park Authority, Test Valley Borough Council, Southampton City Council and Wiltshire Council) were successful in a joint bid to the Government’s ‘Planning Delivery Fund’ This secured funding to support work to enable planned development to come forward while protecting the integrity of the New Forest’s internationally designated sites. This follows the Local Plan Habitats Regulation Assessments (HRAs) undertaken by planning authorities in areas close to the New Forest, which were unable to rule out potential adverse impacts on the New Forest’s designated sites from increased recreational pressures associated with new development.

- 1.2 The joint funding bid outlined the two phases of the project, confirming that the evidence from the Phase 1 research would be used in Phase 2 to:
- To establish a catchment area identifying where population growth would have an impact on the New Forest SPA, SAC and Ramsar sites; and
 - To identify potential options for mitigating the impacts, leading towards a strategic mitigation framework, which includes establishing a robust approach for securing developer contributions.

2. Evidence base

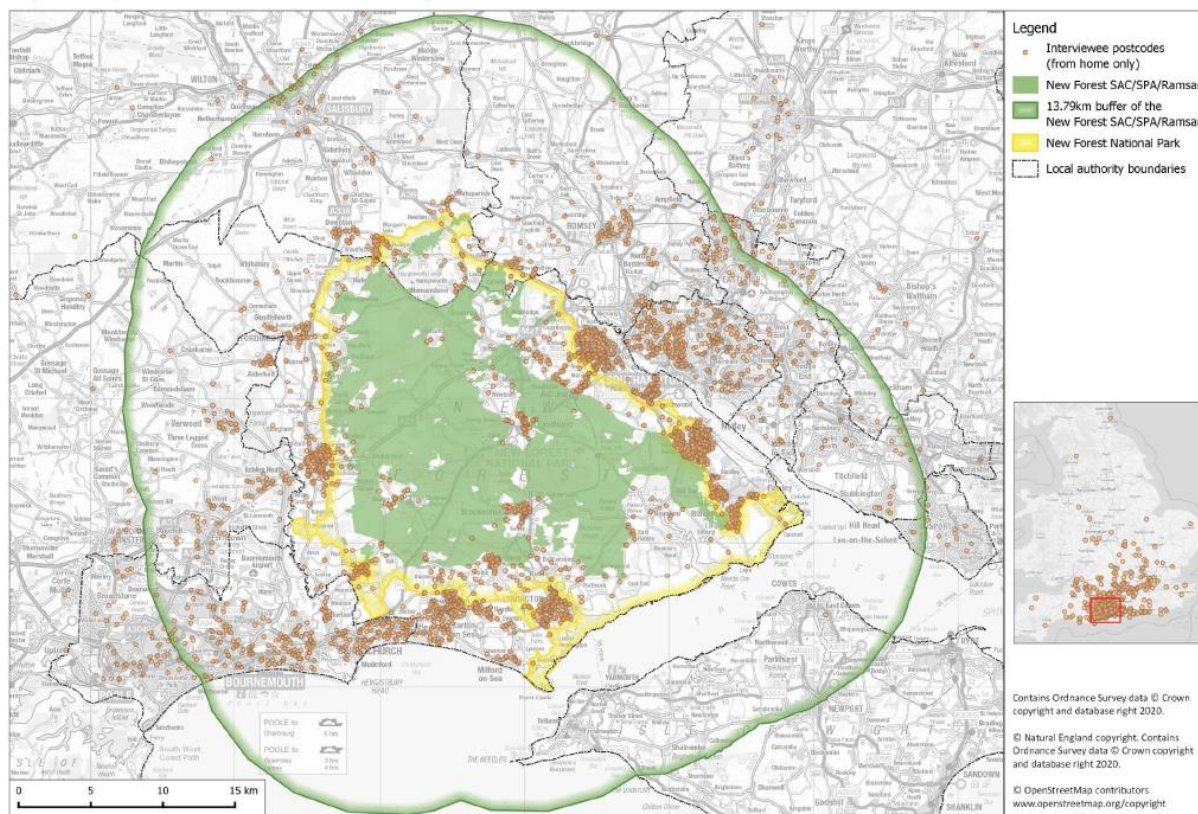
- 2.1 In 2018 the specialist consultant Footprint Ecology was commissioned to undertake primary research into the profile of visitors to the protected habitats of the New Forest; the impacts of recreation arising from planned development on the New Forest's protected designations; and the potential approaches to mitigation. The research represented the most comprehensive survey of recreational use of the New Forest since 2004/5 when Tourism South East surveyed visitors to the area that was to become the National Park.
- 2.2 Footprint Ecology's research involved over 2,000 telephone interviews; car park counts throughout the year at 270 car parks across the designated area; over 5,000 face-to-face interviews at points across the designated sites; and a review of planned development in the area surrounding the New Forest up to 2016. The research reports were published in May 2020 and can be viewed at [Research into recreational use of the New Forest's protected habitats - New Forest National Park Authority \(newforestnpa.gov.uk\)](https://www.newforestnpa.gov.uk/research-into-recreational-use-of-the-new-forest-s-protected-habitats)
- 2.3 The reports identify that increased housing around the SAC/SPA/Ramsar sites will exacerbate existing recreational impacts resulting from a marked increase in recreational use of the designated sites (an 11.4% increase between 2018 - 2036 from new housing alone). Recreational activity can have a damaging effect on the New Forest's protected habitat and species. The pressure is particularly pronounced around the periphery of the SAC/SPA/Ramsar sites. Footprint Ecology recommend that a strategic, proportionate and co-ordinated approach to mitigation is developed. Future work to ensure recreational impacts on the New Forest are appropriately addressed should build on the approaches taken to recreational

mitigation that have been established by some of the local planning authorities and aim to ensure that authorities are working with a consistent evidence base.

- 2.4 Natural England has confirmed that the Footprint Ecology research reports (2020 and 2021) provide a strong evidence base and has commended the research as representing the best available information to inform the work of the local planning authorities as 'competent authorities' under the Habitats Regulations 2017.

3. New Forest 'Zone of Influence' for recreational impacts

- 3.1 The Footprint Ecology report 'Discussion and analysis relating to the New Forest SAC/SPA/Ramsar and a zone of influence for recreation' (2021) recommends an appropriate 'zone of influence' or 'catchment area' within which visitors from new development are likely to have a significant impact on the SAC, SPA and Ramsar designations. The report draws on the findings of visitor surveys that Footprint Ecology conducted in 2018/19.
- 3.2 This identifies a zone of influence where additional residential growth could give rise to likely significant effects on the New Forest SAC/SPA/Ramsar from increased recreational pressure and as such where mitigation would be required. It is based on the 75th percentile for those visiting from home, being 13.79km (straight-line distance) which, rounded, gives a zone of 13.8km. The zone is best applied to the SAC/SPA/Ramsar boundary, rather than access points or survey points. The 13.8km zone is illustrated on the map below by the green line. Beyond the defined 'zone of influence' there may still be a need to consider the potential impact of a development on the New Forest, taking into account the scale of development proposed, ease of accessibility to the New Forest, and availability of alternative visitor destinations.



3.3 The identification of the 13.8km 'zone of influence' for recreational pressures on the New Forest's designated sites in Footprint Ecology's additional report (2021) resulted in Fareham Borough Council, Dorset Council and Bournemouth, Christchurch & Poole Council (BCP) becoming part of the project Steering Group and party to discussions on the next steps.

4. Interim mitigation measures

4.1 In the light of the Footprint Ecology research findings on the 'zone of influence' and the stated advice from Natural England that it represents the best available evidence to inform the decisions of 'competent authorities', the local planning authorities party to this Memorandum of Understanding commit to following a precautionary approach. The authorities also commit to each having in place effective and proportionate measures to address the in-combination recreational impacts arising from new development within their planning jurisdictions. These measures apply to both planning decisions and plan-making and operate within the legal and policy framework of the planning system, such as the use of planning conditions, Community Infrastructure Levy and Section 106 obligations.

4.2 The Footprint Ecology research reports confirm that development in and around the New Forest will result in increased recreational visits to the designated sites; and there is evidence that increased recreation is impacting on the integrity of the designated sites. New development (permitted through the consideration of a

planning application, prior approvals or agreed in principle through the policies and site allocations in development plan documents) will therefore need to either mitigate its impacts; or put forward evidence to justify that the proposal would not lead to a likely significant effect when considered alone or in combination.

4.3 A number of planning authorities have recreational mitigation schemes in place and the table below provides a summary of the measures already in place and their current status.

Planning Authority	Status of approach to recreational impact mitigation (date)
Bournemouth, Christchurch, Poole Council	<p>BCP Council does not currently have a strategy specifically relating to mitigating recreational impacts on the New Forest. However, the Council has been operating a long-term strategy (since 2007) to mitigate the adverse impacts of new residential on the integrity of the Dorset Heaths. The current iteration of the strategy is contained on the Dorset Heathlands Planning Framework SPD 2020-2025. Alongside the provision of infrastructure projects such as SANGs a crucial part of the strategy is the collection of SAMMs contributions. These are used to secure the day-to-day costs of helping local people to alter harmful behaviour through raising awareness of the issues and value of the protected sites, which includes employing wardens to manage visitor pressures on the heathland and delivering awareness and education programmes particularly in local schools. In addition, the Council has adopted the Poole Harbour Recreation SPD 2019-2024 which also includes a strategy to collect SAMMs contributions alongside contributions for infrastructure projects specific to Poole Harbour. In a similar way to the heathland strategy these SAMMs contributions are used to raise awareness of the value of the harbour and the issues it faces to help people behave ways that are less harmful.</p> <p>The general increased awareness of the issues and value of protected sites promoted by these strategies over a number of years should continue to have beneficial influence on the behaviour of people who may choose to visit the New Forest as well as the Dorset Heathlands and Poole Harbour. May 2022</p>
Dorset Council	The Dorset Heathlands Planning Framework 2020-2025 Supplementary Planning Document came into effect on 1 April 2020. It provides a framework for funding and delivering

	<p>effective mitigation measures in the form of Heathland Infrastructure Projects (HIP) and Strategic Access Management and Monitoring (SAMM) for Dorset heaths habitat sites. The council considers that HIP positioned within the 13.8 km 'zone of influence' is also likely, in part, to provide effective mitigation for the impacts of residential development in Dorset Council area on New Forest habitat sites⁹.</p> <p>The Poole Harbour Recreation 2019-2024 Supplementary Planning Document came into effect on 1 April 2020. It provides a framework for funding and delivering effective mitigation measures in the form of Poole Harbour Infrastructure Projects (PHIPS) and SAMM. The council considers that mitigation delivered in the nearby Poole Harbour Recreation Zone could also provide effective mitigation for the impacts of residential development in Dorset Council area on New Forest habitat sites.</p>
Eastleigh Borough Council	The majority of the Borough is within the 13.8km catchment area. The Council approved an interim strategy in March 2022 based on the delivery of proportionate SANG within the borough and contributions to measures within the National Park Authority and to monitoring. SANG will be delivered through both the provision of new and improvements to existing greenspace. - May 2022
New Forest District Council	The Recreation Mitigation Strategy was originally established in the Local Plan Part 2 (2014) and revised in the Local Plan Part One: Planning Strategy in 2020. Policy ENV1: 'Mitigating the impacts of development on International Nature Conservation Sites' sets out the approach and is accompanied by supporting 'Mitigation for Recreational Impacts SPD (April 2021) - May 2022.
New Forest National Park Authority	The whole National Park falls within the 13.8km catchment area. Updated Mitigation Strategy covering recreational impacts from new residential and visitor accommodation across the whole of the National Park adopted in Summer 2020. This updated strategy is considered fit for purpose and will continue to be applied by the National Park Authority to mitigate the impacts of new development in the interim until a more strategic approach is developed. - April 2022

⁹ 'Visitor use of the New Forest by residents of Dorset and implications for the Dorset Local Plan' (9 May 2022)

Southampton City Council	The whole of the city is within the 13.8km catchment area. The Council has ring-fenced CIL contributions from residential development to be spent on New Forest mitigation. This will deliver a package of improvements to semi-natural and natural greenspace within the city and contribute to measures within the National Park Authority. - May 2022
Test Valley Borough Council	Part of the Borough is within the 13.8km zone. The Council's interim mitigation framework (2014) is now being applied to the updated zones of influence. The Council is in the process of preparing a Supplementary Planning Document on this matter. - May 2022
Wiltshire Council	The interim Mitigation Strategy uses an 8km zone of influence to Sept 2021, following which the 13.8km zone is adopted for qualifying residential and tourism development. The approach to mitigation involves a combination of measures depending on type and size of development: direct provision of suitable alternative natural green space (SANGs) as part of developments; or offsite measures - access and visitor management in the new forest itself and/or strategic SANG. Direct provision is funded directly by the developer, whereas CIL is used for off-site measures. Mitigation is also required for larger developments in the 13.8km to 15km buffer zone where Habitat Regulations Assessment demonstrates potential for adverse effects. This interim strategy is considered fit for purpose and will continue to be applied by Wiltshire Council to mitigate the impacts of new development until a more strategic approach is developed.- April 2022

5. Long term strategic approach to mitigating recreational impacts

- 5.1 Section 4 of this Memorandum of Understanding sets out the approach adopted by planning authorities party of this agreement. The planning authorities recognise that the Footprint Ecology research reports (2020 and 2021) represent the best available evidence for HRA purposes.
- 5.2 The planning authorities party to this agreement, working alongside Natural England and Forestry England, are also committed to working together to develop a longer term, strategic approach to mitigating recreational impacts. This reflects the recommendations of the Footprint Ecology research report on 'Impacts of

recreation and potential mitigation approaches' (2020). The project Steering Group typically meets quarterly each year and is committed to working together on the next steps, recognising the benefits of the co-ordinated approach recommended in the Footprint Ecology research reports.

5.3 The Executive Summary to the report states, *"...the measures identified could form a 'package' of avoidance and mitigation measures that should resolve the cumulative impacts from recreation associated with housing growth around the New Forest. Such a package should enable Local Authorities to be able to rule out adverse effects on integrity to the New Forest SAC/SPA/Ramsar as a result of increased recreation associated with Local Plans. The measures will however not necessarily be easy to establish and will require significant impetus to achieve. Given the broad geographic scope and need for measures to dovetail, it will be important that there is a strategic, proportionate and co-ordinated approach, which will require partnership working across a range of local authorities and stakeholders."*

5.4 Paragraph 4.2 of same report states,

"Each planning authority should have a well-informed and articulated mitigation scheme, commensurate with the distribution of proposed development in relation to the New Forest SAC/SPA/Ramsar...In other parts of the UK, strategic approaches to mitigation have been established where multiple local authorities fund a series of consistent, agreed and implementable measures carefully designed to resolve the in-combination impacts associated with local development."

5.5 In taking the New Forest mitigation work forward, the local planning authorities are committed to working together to develop an appropriate strategic package of mitigation measures, based on a consistent evidence base and future research to supplement this evidence base. Each local planning authority will ensure mitigation measures are in place, proportionate to the impact planned development in their area will have on the New Forest's designated sites, taking account of evidence and assessments prepared as part of the plan making process.. The mitigation will involve a package of measures, including measures within the respective local planning authority's areas (including effective mitigation delivered through existing strategies); and also measures delivered within or close to the New Forest's designated sites to mitigate the increase in visitors from the planned new development. This will enable the in-combination recreational impacts arising from planned development to be addressed.

Signatures:

Bournemouth, Christchurch & Poole Council

Dorset Council

Eastleigh Borough Council

New Forest District Council – Claire Upton Brown, Executive Head for Planning, Regeneration and Economy

New Forest National Park Authority – Steve Avery, Executive Director of Strategy & Planning

Southampton City Council

Test Valley Borough Council – Graham Smith, Head of Planning Policy & Economic Development

Wiltshire Council – Georgina Clampitt-Dix, Head of Spatial Planning

**Statement of Common Ground between Wiltshire Council and Swindon Council
March 2020**

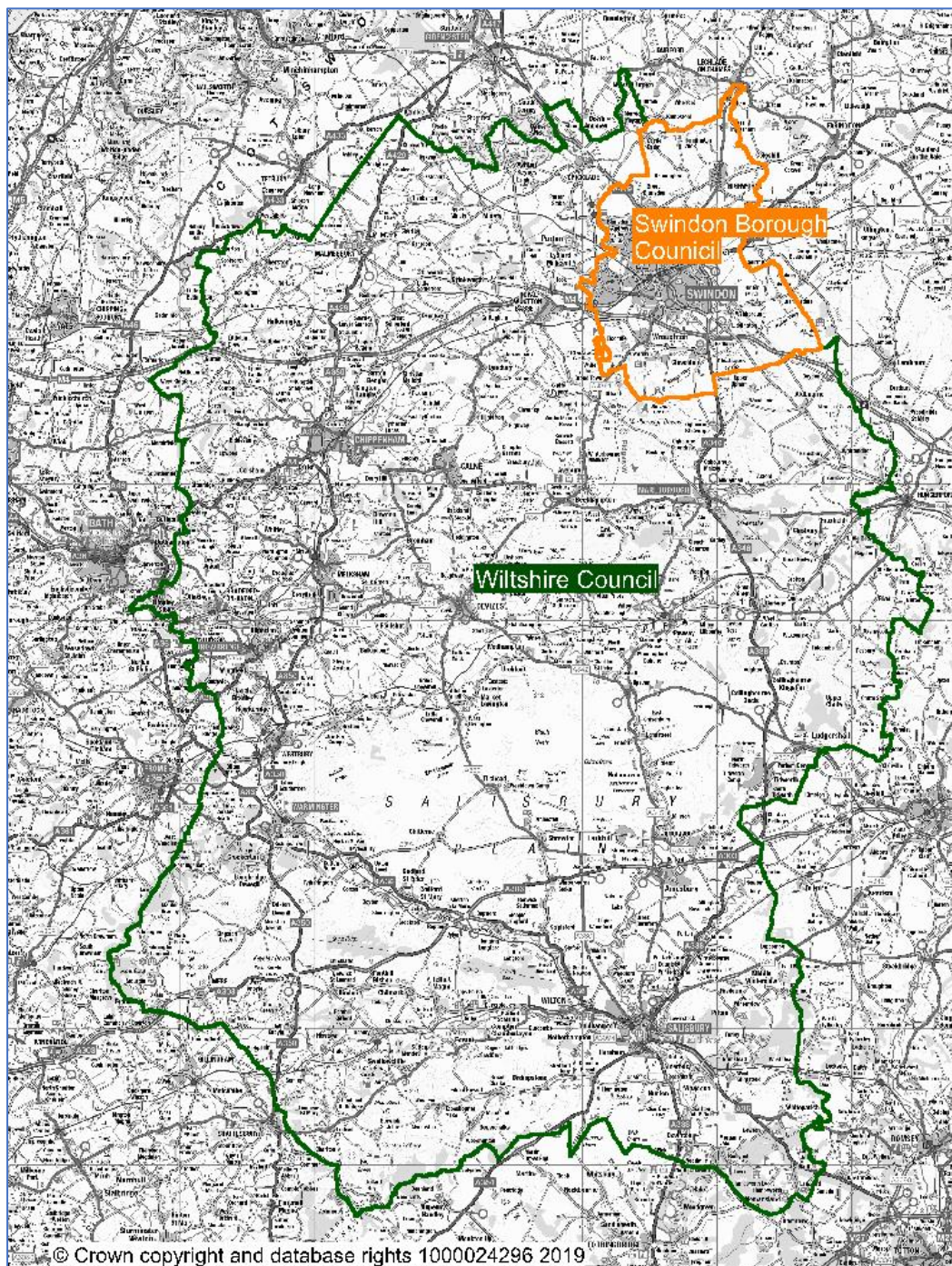
Joint working with Swindon Borough Council is ongoing and this will be updated as the plan progresses.

**Swindon Borough Council
Wiltshire Council**

Statement of Common Ground March 2020

Introduction and Context

- 1.1 This statement of common ground is entered into between Wiltshire Council and Swindon Borough Council. The statement of common ground covers the strategic matters that cross the boundary between the authorities shown on the map below.



- 1.2 Swindon Borough Council and Wiltshire Council are unitary authorities and there are transport, economic and housing market links between the two administrative areas. The functional housing market links between the two administrative areas are explained in the jointly commissioned Swindon and Wiltshire Strategic Housing

Market Assessment VOLUME ONE Defining the Housing Market Areas, June 2017, Opinion Research Services, which is available here: [Volume 1 Identifying the Housing Market Areas](#) . The Housing Market Areas were subsequently reviewed following consultation in Autumn 2017 but did not result in any changes to the Swindon Housing Market Area. This work identified a Swindon Housing Market Area that includes areas within Wiltshire (see **Appendix 1**).

- 1.3 The two administrative areas also share functional economic links within the M4 Corridor Functional Economic Market Area as set out in the jointly commissioned Swindon and Wiltshire Functional Economic Market Area Assessment, December 2016, Hardisty Jones Associates. This document is available here: [Swindon and Wiltshire Functional and Economic Market Assessment](#)
- 1.4 The current development plan documents for Swindon Borough Council and Wiltshire Council comprise the following:

Wiltshire Council	Swindon Borough Council	Joint
Wiltshire Core Strategy (2015)	Swindon Borough Local Plan 2026 (2015)	Wiltshire and Swindon Waste Site Allocations DPD (2012)
Chippenham Site Allocations Plan (2017)	Swindon Central Area Action Plan (2009)	Wiltshire and Swindon Minerals Site Allocations DPD (2012)
Wiltshire Housing Site Allocations Plan (2020)		Wiltshire and Swindon Waste Development Control Policies DPD (2009)
West Wiltshire Leisure and Recreation DPD (2009)		Wiltshire and Swindon Minerals Development Control Policies DPD (2009)
Saved policies:		Wiltshire and Swindon Waste Core Strategy (2009)
North Wiltshire Local Plan (2006);		Wiltshire and Swindon Minerals Core Strategy (2009)
Kennet Local Plan 2011 (2004);		Saved policies: Wiltshire and Swindon Minerals Local Plan (2001)
West Wiltshire District Plan First Alteration 2011 (2004);		
Salisbury Local Plan 2011 (2003).		

- 1.5 Swindon Borough Council and Wiltshire Council are both undertaking reviews of their adopted Local Plan/Core Strategies to aligned plan horizons. The authorities' reviewed local plans will cover the period to 2036. The timetables for plan-making in the two authorities are set out in the authorities' published local development schemes and those in place at the time of writing are available here: [Wiltshire Council Local Development Scheme 2019](#) and [Swindon Borough Local Development Scheme 9th Edition](#).
- 1.6 Both authorities are currently reviewing their respective Local Development Schemes to enable further evidence to be completed.

- 1.7 Initially, both authorities committed to the preparation of a Joint Spatial Framework such was the nature of cross boundary working that seemed necessary. This would have been an informal planning document and not part of the development plan. It would have been a planning framework that could overarch the preparation of each authorities' local plan ensuring consistency between the two.
- 1.8 National changes to how local planning authorities approach meeting their housing needs, introduced by the Housing White Paper, changed the basis for this approach, as did further detailed work on local development needs and land supply. In addition, consultation on the idea returned significant doubts about how such a framework would be tested and what its status would be in planning decisions. Fresh guidance from Government subsequently also highlighted a stronger role played by statements of common ground and therefore this course is now preferred.
- 1.9 The Swindon and Wiltshire Local Enterprise Partnership (SWLEP), of which Swindon Borough Council and Wiltshire Council are both members, is preparing a Local Industrial Strategy. Following its completion, a statement of common ground will be prepared with SWLEP for agreement.

2. Governance Arrangements

- 2.1 Cooperation in relation to strategic policy-making takes place through regular planning officers meetings attended by the Planning Policy Manager of Swindon Borough Council and the Head of Spatial Planning at Wiltshire Council. Such meetings have been undertaken on a regular basis since the inception of joint working on the reviews of the authorities' local plans in 2015.
- 2.2 Cooperation between elected councillors of the two authorities takes place at informal, joint working group meetings attended by the two councils' cabinet members for strategic planning and economic development, together with other cabinet portfolio holders where appropriate. Meetings have been held approximately three times a year. Formal decisions when required are made by the Councils' respective Cabinets, with the timing of papers aligned when appropriate.

3. Strategic Matters Covered by this Statement

- 3.1 This statement of common ground covers the following strategic plan-making matters:
- Housing
 - Employment
 - Transport
- 3.2 Each authority is in the process of developing a spatial strategy, including the identification of specific sites to help meet land requirements and maintain supply in line with Government policy. Swindon Borough Council published their draft Plan on 17 December 2019, with consultation ending 31 January 2020 and are considering the response. Wiltshire Council is proposing to undertake consultation on their emerging strategy Quarter 3 2020.

- 3.3 Continued liaison on detailed proposals will ensure adequate infrastructure provision and properly coordinated provision of new land requirements. These will be documented in further iterations of this statement.

4. Agreement on Local Housing Needs

- 4.1 Through their respective plan reviews, both Swindon Borough Council and Wiltshire Council are planning to meet their assessed housing needs in accordance with the National Planning Policy Framework (NPPF) and the Government's Planning Practice Guidance. The Councils will keep this under review in the light of any changes to national policy or guidance.
- 4.2 The authorities jointly commissioned consultant Opinion Research Services to identify Housing Market Areas (see paragraph 1.2) and provide advice on the scale of housing need to 2036 including that necessary to balance jobs to homes, taking account of long term migration patterns and job growth projections in the Swindon and Wiltshire Functional Economic Market Area Assessment; which can be viewed here: [Swindon and Wiltshire Local Housing Needs Assessment 2019](#)
- 4.3 The following table sets out the figures that are being used by both authorities to inform their plan making. Both authorities are intending to plan for at least the local housing needs calculated by the current standard method at April 2019 or its successor, as required by the NPPF.

Authority	Standard assessment of local housing need in dwellings per annum (Planning Practice Guidance methodology)	ORS assessment of housing need in dwellings per annum	Estimated housing need to 2036 after planned commitments
Wiltshire Council	2,042	2,281	Circa 18,000
Swindon Borough Council	1,040	1,136 ¹⁰	Circa 1,500

- 4.4 Taking into account the scale and form of assessed housing needs, the extent of current and prospective land supply, it is agreed that: each authority can meet its assessed housing need within its own administrative area and provide for a supply of deliverable land for house building that represents sustainable development consistent with national policy.
- 4.5 Each authority is therefore making provision to meet their respective needs (and identify deliverable sites to maintain supply) within their Local Plans.

5. Employment Land Needs

- 5.1 The authorities will plan for employment land to 2036 on the basis of the evidence in the Functional Economic Market Area Assessment which is translated into

¹⁰ Local housing need plus buffers, as in Swindon Borough Local Plan 2036 Proposed Submission Draft (December 2019)

requirements for the authorities' administrative areas in their respective employment land reviews, available here: [Wiltshire Employment Land Review](#) and here: [Swindon Employment Land Review](#)

- 5.2 The employment land needs to 2036 proposed to be used by each respective authority as the basis for plan-making are as follows:

Authority	2016 to 2036 need for offices	2016 to 2036 need for industrial land
Wiltshire Council	17-42ha	140ha
Swindon Borough Council	16,000sqm to 67,700sqm	Up to 56.7ha

- 5.3 The amounts are generally expressed as ranges reflecting differing assumptions of employment growth and, if office development is delivered on urban or greenfield 'campus' locations. Swindon Borough is proceeding on the basis of meeting the upper range of the industrial land requirement.
- 5.4 It is agreed that each authority is able to accommodate its own planned employment land needs within its own administrative area. The employment land needs will be met on land which already benefits from planning permission, land which is currently allocated for development, or on land which will be allocated for development in the authorities' forthcoming local plan reviews. On this basis neither authority has unmet employment land needs.
- 5.5 Whilst it is agreed that each authority can meet its own scale of employment land needs, provision should be made for an appropriate range of sites and locations. Through the plan making process consideration is being given to the suitability of Junction 16 of the M4 as a location for future employment growth.
- 5.6 With the announced closure of the Honda Manufacturing Plant, there is a potential for significant intensification of the site, which may have implications for both authorities and will require continued collaboration.

6. Agreement on Transport Matters

- 6.1 Joint working will continue to consider the effects of each authorities' spatial strategy on transports networks, the capacity of existing infrastructure and what may be needed to mitigate the combined effects of development proposals. This includes the impact of growth on J16 of the M4.
- 6.2 Both authorities have endorsed the Swindon and Wiltshire Local Enterprise Partnership's Rail Investment Strategy: <https://swlep.co.uk/about/our-strategies>. It is envisaged that the next iteration of this statement of common ground will contain a list of agreed matters in relation to transport which are relevant to land use planning. In this regard the authorities have already worked, through meetings with their consultants and Highways England about their road traffic models, which are used for modelling development options to ensure they are aligned and consistent.

7. Other Strategic Matters Requiring Agreement and the Process for Seeking Agreement

- 7.1 Swindon Borough Council consulted on their draft submission plan between December 2019 and January 2020 including preferred allocations to meet the residual requirement and the most appropriate means to sustain a five year supply of deliverable land for housing development. For the avoidance of doubt the present spatial strategy of development at Swindon including large urban extensions is maintained, as part of a wider strategy, for delivering the planned growth already identified in the current adopted Plan and carried forward to 2036.
- 7.2 Wiltshire Council is assessing the merits of alternative development strategies for the distribution of growth at settlements and the rural area within the Wiltshire part of the Swindon HMA.
- 7.3 It is the intention of each authority to keep the other appraised through Governance arrangements above and officer liaison.
- 7.4 Through ongoing liaison the authorities will consider and identify any new cross-boundary issues, in particular as regards infrastructure and transport impacts, of the plans' respective spatial strategies. The Councils will work to achieve agreement on the respective spatial strategies prior to the submission of plans for examination.
- 7.5 With regard to green infrastructure, it will be important for the green infrastructure strategy and associated work that is in preparation by Wiltshire Council to align with Swindon Borough Council's to ensure connectivity of green infrastructure across both areas. It is agreed each authority will have consistent policies in relation to green infrastructure and continue to co-operate on such matters.

This version of the statement of common ground is agreed on **16 March 2020** by Wiltshire Council and Swindon Borough Council.

It will remain an iterative document and be updated at key stages in the preparation of the Councils' respective Local Plans.

Signed _____

CLlr Toby Sturgis, Cabinet Member for Spatial Planning, Development Management and Investment

On behalf of Wiltshire Council

Signed _____

CLlr Gary Sumner, Cabinet Member for Strategic Planning

On behalf of Swindon Borough Council

Appendix 1: Swindon Housing Market Area

