

February 2021



Wiltshire Council **LOCAL PLAN**

Looking to the future

Rural live events Q&A sessions: responses



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1 Introduction

- 1.1 As part of the Local Plan review consultation, Wiltshire Council hosted 17 live online consultation events for communities and other stakeholders. This included one event per Market Town or Principal Settlement and two rural events which encompassed all other Wiltshire villages and settlements.
- 1.2 Each event included a presentation which summarised the content of the consultation and gave further explanation about the proposals. This was followed by a question and answer session. Participants were able to submit questions, many of which were answered during live event. However, because of the volume of questions, it was not possible for all of the questions to be answered in every event. The aim of this document is to ensure that every question asked receives a response.
- 1.3 It has become evident that there are a number of questions which relate to some common overarching themes which tend to come up several times in every event. These questions have been collated and are addressed in the subsequent section. It is important to note that where numerous questions were asked about a similar topic, an all-encompassing question has been written. Therefore the precise wording of questions may have been adapted to have greater inclusivity of a wider issue.
- 1.4 Representations on the consultation are most welcome and are encouraged to be made through our online forms available on the consultation webpage.
- 1.5 For further information about the consultation or to submit comments via email please see our [contact information](#).

Questions

2 Consultation

Q1. How many people joined the events and how many questions have been invited?

A1. The live events were widely publicised and available for anyone to sign up to, rather than there being an invite. For the two Rural events, almost 350 people attended over the two nights. There was no limit to the number of questions invited on the night, this report endeavours to answer all those submitted.

Q2. Rather than everyone having to spend time searching the council website for the various documents, can you send out to all attendees the links to all the documents and reference material. Are you going to give guidance as to how to access these documents online?

A2. All of the consultation documents can be found on the [consultation webpage](#), where the links to the documents are clearly set out. If anybody has any queries about how to access these documents or are having trouble finding a specific document, please [contact us](#).

Q3. Where would I find the housing plans please?

A3. All of the consultation documents, can be found on the [consultation webpage](#). If anybody has any queries about how to access these documents or are having trouble finding a specific document, please [contact us](#).

Q4. Under section 33A of the Planning and Compulsory Purchase Act 2004 (as amended), local planning authorities are under a duty to cooperate with other local planning authorities in preparing Local Plans where strategic matters - such as, 'planning measures to address climate change mitigation' - have impacts across administrative boundaries. So what cooperation have you done on rural communities - many are closest to large towns e.g. Bath, Frome, Swindon, Cirencester, Andover, Gillingham, Shaftesbury?

A4. The duty to cooperate is recognised and the Council continues to engage with neighbourhood authorities on cross boundary matters. Neighbouring authorities have been informed of the Local Plan Review consultation that is underway and discussions are taking place during the consultation period with key authorities such as Bath and North East Somerset, Swindon Borough and Dorset Council. One of the main considerations in line with national planning policy is whether each authority can meet its own housing needs.

Q5. Does this Rural Communities category cover the proposed Future Chippenham sites?

A5. The Local Plan Review proposals for Chippenham are explained in the [Planning for Chippenham](#) and [Chippenham Site Selection](#) reports, also available as part of the Local Plan consultation.

This is different to a separate consultation on 'Future Chippenham', which is being undertaken on the Future Chippenham distributor road route options. Details of how to take part in that consultation can be found on the Council's website at:

www.wiltshire.gov.uk/future-chippenham

Q6. How will you ensure this presentation is shared as widely as possible? Will these slides be available after meeting?

A6. The presentation slides are available on our [website](#).

3 Relationship with national policy

Q1. How do these proposals relate to Govt proposals for change, for example NPPF and the Planning White Paper?

A1. The Council is consulting on suggested content for a revised Local Plan, the Local Plan Review. Policies and proposals of the Local Plan must be consistent with the current National Planning Policy Framework (NPPF) and not what it might be in the future. For example, housing requirements are proposed for neighbourhood area designations in accordance with requirements in the NPPF.

The Government has set out its proposals for reforms to the planning system in a White Paper, published last year. Many of these changes would require primary or secondary legislation. It has yet to table any detailed proposals and in any event, these will also take time to put in place once agreed. In the meantime, the Government has urged every local authority to continue its work on Local Plans. The Local Plan Review will likely progress under existing regulations and/or under any transitional arrangements for reforms when they materialise.

4 Timescale of the Plan

Q1. When adopted, will the Local Plan Review replace all existing Core Strategy and saved former district Local Plan policies?

A1. As part of the Local Plan Review we are looking to replace the saved Local Plan policies (as set out in Appendix D of the Wiltshire Core Strategy) so that they are either removed or where still relevant are reflected in new or amended policies in the Local Plan. Policies within the Wiltshire Core Strategy that remain effective and consistent with NPPF will likely be retained and carried forward into the Local Plan Review.

Q2. Please could you explain why the proposed Plan horizon is 2036, whereas the NPPF requires strategic policies to look ahead over a minimum 15-year period from adoption?

A2. The review uses a twenty-year period as per the Wiltshire Core Strategy and takes the start as the midpoint of this current plan, with a plan horizon of 2036. The plan started its preparation in 2017 and the dates for evidence collated to support the Plan are based around this time period. Given the importance of reviewing the plan every five years in line with Government policy to ensure it is up to date, it is considered that a new plan should be put in place as quickly as possible with an early review to extend the time horizon. The Plan is likely to need a further review at adoption, in order to adapt to Government reforms springing from the Planning White Paper published last year. This will extend the time horizon beyond 15 years ahead.

5 Housing Market Areas (HMAs)

Q1. Can you please confirm why the Swindon HMA is named as such? We find that it can cause confusion that Wiltshire has a 'Swindon HMA'.

A1. Each Housing Market Area (HMA) is centred around the main town and was named by consultants who defined the four HMAs operating in the County. We can reconsider the name of the HMA, so it is distinct from the Swindon Borough Council area.

Q2. Please can you confirm what happens if one HMA doesn't deliver their housing allocation? Will an adjoining HMA need to make up the shortfall? Also, is there a risk that Wiltshire will need to make up any of the shortfall if Swindon Borough Council fail to meet their housing need?

A2. Housing Market Areas (HMAs) are used in the Local Plan Review to distribute growth, to ensure housing is provided where it is needed and the level of growth for the county can be met. It is not anticipated that there will be the need to make up a shortfall between HMAs within Wiltshire. In preparing the Plan the intention is to identify deliverable housing allocations to meet the housing needs identified for each HMA with a clear understanding of their timescales for delivery. Monitoring housing delivery over the course of the plan period will inform whether new allocations need to be identified to improve supply within Wiltshire.

Swindon Borough Council has its own assessment of housing needs that it is planning to meet within the Borough.

6 Settlement Strategy

Q1. How will the character/identity of large settlements be protected - for example the rural gap between Derry Hill and east Chippenham, potentially eroded by east Chippenham development, road, and solar farm?

A1. The need to preserve the separate character and rural identity of settlements and features is a factor that has sifted out land from being considered as part of the pool of potential development sites.

Master planning urban extensions is 'landscape led' in the sense that the protection of gaps, views and landscape character determine those areas that can be built on and those not. A step showing how this can be achieved is the concept plan illustrating preferred sites for development east of Chippenham in the Planning for Chippenham consultation paper.

Q2. What are the determining factors in allocating the term of a large village within the core strategy?

A2. The Local Plan Review is not proposing to review which Large Villages have been designated as such. Designations were tested and settled as part of preparing the Wiltshire Core Strategy. Determining factors revolved around the levels of services and facilities a settlement contained and therefore their strategic role in providing them for a wider catchment as well as the community itself.

Q3. Will small villages be allowed this time to have some new homes within a village so that the village has a better chance of reaching or maintaining critical mass?

A3. New homes to meet local needs may be accommodated as infill within a small village or by exception schemes. The consultation paper [Empowering Rural Communities](#) proposes a revised policy relating to exception schemes, which allows proposals that are "20 dwellings or fewer and will be no greater than 5% of the size of the settlement".

Q4. The algorithm you use seems to discriminate against smaller 'large villages'. Some villages such as Worton are a long ribbon shape and when you add a 100m buffer you end up with a very large area. Smaller villages are less likely to have mitigating factors than larger villages.

A4. The 100m buffer is not used as a means to allocate sites for development. It's used as a net cast around a settlement that makes sure we capture all the environmental constraints that we need to take into account when suggesting a housing requirement.

Q5. Would you please explain the implications of Step B, Applying a 100m Buffer to settlement boundaries? Is the 100-metre buffer zone referred to at para 87 a way of effectively extending the settlement boundaries of large villages. I just don't understand the para and the subsequent table in para 92. How can it be justified to apply 100m buffer to settlement boundaries - when was the last time existing settlement boundaries were updated to accurately reflect the built-up area of rural settlements?

A5. The 100m buffer around a settlement is the net cast to catch environmental constraints. It doesn't have the purpose of amending settlement boundaries or imagining that development must take place within them.

Settlement boundaries have been reviewed by the Wiltshire Housing Site Allocations Plan (WHSAP) which was adopted last year. Qualifying Bodies may carry out their own review as part of preparing a neighbourhood plan.

Q6. If you look at a population (census) vs proposed allocation you can find a ratio (number of residents per new dwelling). For the smallest 6 villages this is around 16 villagers per new house. For the largest villages the ratio is around 51:1. So you are proposing to put proportionally far more houses into the smallest communities? The average local service centre ratio is 16:1, which you would expect. The overall average for all Wiltshire villages is 27:1. How can it be 'sustainable' for Colerne (population 2972) to have an allocation of 40 houses and Worton (population 624) to also have an allocation of 40? There are very many villages much larger than Worton that have either the same or less allocation, but they clearly have far more in terms of facilities and likely need. Ramsbury population 1989, allocation 35, Aston Keynes 1400 population, allocation 35. Even with your factors applied there is an obvious imbalance here. I suspect that the factoring, which is clearly theoretical and generalist, is having rather the opposite effects of the Local Plan aims of putting the development into the settlements that are best able to absorb and have the identified need.

A6. The Council's method for determining the neighbourhood area housing requirements takes a wider range of factors other than population into account, such as:

- The actual size of the settlement both geographically and number of dwellings,
- The proximity of settlements (in applying the rural buffer in Step B) to other nearby settlements which have their own housing requirements, and
- The extent that the settlement and immediate surrounds are constrained by various planning constraints including Flood Zones 2 and 3, Green Belt, Areas of Outstanding Natural Beauty (AONB) and heritage assets.

Q7. Will the Council consider the potential for growth at larger settlements which lie outside but adjacent to the Wiltshire boundary, such as at Ludgershall, Shaftesbury and West Swindon, where land on the Wiltshire side is effectively in the rural area?

A7. The Council works with adjoining local planning authorities on a range of cross boundary issues. As far as meeting local housing needs, each authority is expected to meet the needs forecast for its area. Only if they cannot be met is it necessary to consider unmet needs being accommodated outside the Wiltshire boundary.

Q8. Is Mere classified as a large village? What is the definition of a large village?

A8. Mere is designated as a Local Service Centre. What this means is set out in Core Policies 1 and 2 of the Wiltshire Core Strategy.

Q9. Are there to be any changes proposed to large and small village designations or additional settlement boundaries to be made?

A9. No with the exception set out in the consultation documents, which suggests two additional designations to additional Large Villages (Bulford and Durrington) because they were previously linked with Amesbury, but otherwise it is suggested that the list of Large and Small Villages is unchanged.

The Local Plan Review will not be amending settlement boundaries at Large Villages or Local Service Centres.

Q10. It was said that the housing allocation for large villages/local service centres is influenced by the level of development that preceded the plan period. Have you aimed to continue with the same level of growth? What policy has been applied here?

A10. The starting point for distribution of growth for the rural part of the Housing Market Area is based on historic levels of growth for each category of settlement. However, this has not influenced housing requirements at an individual settlement level.

We do not aim to continue each rural settlement's recent rate of growth. Individual requirements are suggested for 2016-2036 and these are based largely on the size of settlement. Recent development including outstanding planning permissions from 2016 will reduce the level of development that needs to be planned for.

Q11. Why are new villages not considered? A few well designed and laid out new villages that offer good communication and infrastructure would seem a more sustainable idea than sticking more people in disparate villages that have few facilities.

A11. The possibility of one or more new settlements was considered when we developed alternative development strategies. One alternative involving a new settlement was tested for Salisbury Housing Market Area.

The possibility has not been pursued largely because of the long lead in time before housing needs would be met. As no landowners or developers have promoted a site for a new settlement there are no definite locations or proposals.

Q12. How do we protect the integrity of current villages and Parishes whilst acknowledging that the current position functions well with the infrastructure available and no expansion or additional housing is the preferred option?

Q13. What policies are there to prevent coalescence between towns and their surrounding villages?

Q14. Why don't buffers work round towns that are growing to protect villages?

Q15. As our major towns' sites encroach into the countryside and rural parishes are there any plans to include enforceable rural buffers around these main settlements?

A12, A13, A14, A15. Policies in the Plan contain a general presumption against new residential development outside settlement boundaries. Where settlements do need to expand, the Plan is the means to identify appropriate locations that avoid coalescence and neighbourhood plans can also play a part. It is not always possible to plan for settlement growth within parish boundaries as many settlements already relate to more than one parish or are located on the edge of another.

The proposed 'Place-shaping Priorities' in the consultation documents for the Market Towns and Principal Settlements, where appropriate, address the issue of coalescence and protecting the separate identities of villages, it is intended that these priorities will form the basis of policies in the Plan. The Plan can also set out requirements to ensure detailed master planning of sites retains the separate identity and character of settlements.

Q16. Should close villages be considered as a group equating to a large village?

Q17. Where small villages are contiguous will they be treated as large villages even though there are no more facilities to support any new homes?

A16, A17. The role and function of settlements in Wiltshire is currently set out in Core Policy 1 of the Wiltshire Core Strategy (the Settlement Strategy), and the Area Strategies list the specific settlements that fall within each category. There is no proposal to consider groups of Small Villages as Large Villages.

However, in preparing the Local Plan the Council will consider the effectiveness of all Core Policies to determine whether there is a need for any refinements. This consultation is an opportunity for you to let us know whether there are changes that are needed in relation to policies for the rural area and to provide us with specific examples where this might be the case.

Q18. Will planning permission be given to housing outside of the Settlement Boundary in order to meet the allocated housing target for a "Large Village".

A18. The general presumption against housing proposals outside a settlement will apply in accordance with Core Policy 2 of the Wiltshire Core Strategy. The new core policy on page 10 of the [Empowering Rural Communities](#) document sets out how it is anticipated the housing requirements for Large Villages should be met.

Q19. It appears that for the Trowbridge market area 91.4% of all houses are proposed in either the principal settlement or market towns. This is higher than any other market area. Should the Large Villages not plan for more dwellings to ensure there is not over dependency on larger settlements?

A19. The levels of growth have been identified based on the settlement hierarchy, which seeks to focus growth towards the principal settlement and market towns in each housing market area. What is considered to be appropriate for each of these is explained in the [Emerging Spatial Strategy](#) document and comments are invited.

The role for the Large Villages and proposed indicative requirements for each of these is set out in the [Empowering Rural Communities](#) paper, views are also sought on each of the indicative housing requirements for these settlements.

In simple terms, the larger the settlement, the higher the growth proposed; the assumptions being that larger settlements tend to have more facilities and employment opportunities as

well as a greater capacity for growth, for example, by having more extensive brownfield opportunities for development.

Q20. Is a new settlement to serve Boscombe Down and Porton still on the agenda? Are possible sites being sought and how could this affect existing villages?

A20. An alternative involving a new settlement was considered as part of one of the alternative development strategies for the Salisbury Housing Market Area but is not currently being considered. In appraising the alternative development strategies through the Interim Sustainability Appraisal, the new settlement option did not score as well as the option that is being tested through this consultation.

7 Types of housing (e.g. infill, affordable, specialist, holiday lets, mixed-use)

Q1. How many houses do Wiltshire consider to be acceptable for an infill site? What is definition of infill re metres between existing dwellings in small villages?

A1. Generally, there is not a definitive definition of 'infill'. Each instance must be considered on its individual circumstances, but a common starting point is the completion of an otherwise built-up frontage by development in a gap capable of accommodating a small number of dwellings. For the purpose of Core Policy 2 of the Wiltshire Core Strategy and small villages specifically, paragraph 4.34 clarifies that "infill is defined as the filling of a small gap within the village that is only large enough for not more than a few dwellings, generally only one dwelling".

Q2. How do you define affordable? This seems critical and a clear definition given. Can you please provide a definition for the term "affordable" in all planning literature?

A2. The definition of 'affordable', as in affordable housing, is set out by Government in the glossary to the [National Planning Policy Framework](#).

Q3. Would a requirement for affordable homes on all sites of 5 units or more be contrary to the Planning Practice Guidance which states that affordable housing should only be sought on sites of 10 units or more unless a site is in a designated area (i.e the Area of Outstanding Natural Beauty)?

A3. No. The Council may seek to extend the designation of areas as 'rural' under Section 157 of the Housing Act 1985. This would require the Secretary of State's approval. Separately, whilst having regard to national policy the Council may also set out local circumstances with e

Evidence to justify an exception to national policy.

Q4. I do agree that one issue is that smaller properties are understandably extended and thus reduce the number of smaller/affordable properties available for both first-time buyers and for older people to downsize and thus free up larger properties. Some restrictions on extending affordable homes seems justified.

A4. The Council is consulting on proposals to limit the ability to extend small homes, so a village preserves a better range of properties. A good range of housing types in the local stock, supporting a range of household types, can help underpin a mixed and resilient community.

Q5. How do you ensure affordable housing is and remains available for people connected with the village and not bought up as investments, the influx of people leaving cities as a result of Covid or second homes?

A5. The Council is proposing amendments to Core Policy 44, see page 6 of the [Empowering Rural Communities](#), to allow for both affordable housing and community led initiatives in villages. Communities may wish to respond to needs identified for sheltered accommodation, first homes or possibly key workers. Views are sought as part of this consultation.

Q6. What is the potential split of "affordable housing", say 1- or 2-bedroom homes, will be truly 100% buyer owned as opposed to those with shared ownership of typically ~50% ownership?

A6. The tenure mixes for affordable housing in Wiltshire is currently determined by the Wiltshire Strategic Housing Market Assessment published in 2011 (as referred to in Core Policy 45) which set out a need for the affordable housing to be provided at a mix of 60% rented and 40% intermediate housing. This policy will need to be reviewed to ensure an appropriate mix of housing is sought.

Q7. We also need housing to satisfy the need for disabled young people wanting to stay in their villages

A7. Wiltshire Core Strategy Core Policy 46 'Meeting the needs of Wiltshire's vulnerable and older people' provides particular support for new homes to meet these and other needs, including ensuring that they adaptable for a range of needs over the years. The effectiveness of this policy will be reviewed to ensure it continues to meet those objectives.

Q8. I am concerned that small villages homes are being extended to make large family homes, and adjacent properties being combined into one. This inflation in house price means younger families and those on low incomes are prevented from buying homes in villages. Lack of demographic diversity eviscerates village life. We need schools, shops and pubs to thrive. Dormitory villages are not full communities.

A8. The Council is consulting on proposals to limit the ability to extend small homes so a village preserves a better range of properties. A good range of housing types in the local stock, supporting a range of household types, can help underpin a mixed and resilient community.

Q9. Will a policy supporting proposals for older persons housing be formed as an exception policy?

A9. Wiltshire Core Policy 46 'Meeting the needs of Wiltshire's vulnerable and older people' provides particular support for new homes to meet these and other needs, including ensuring that they adaptable for a range of needs over the years. The effectiveness of this policy will be reviewed to ensure it continues to meet those objectives.

Q10. These smaller properties are increasingly in demand for downsizing, to keep people in their desired rural community, whilst freeing up larger family homes into the housing stock. Wiltshire has a very high rate of under occupancy as older people feel there aren't suitable or attractive products that would convince older people to vacate their long-term family home.

A10. The Council is consulting on proposals to limit the ability to extend small homes so a village preserves a good range of properties. A good range of housing types in the local stock, supporting a range of household types, can help underpin a mixed and resilient community.

Q11 How do you plan to control homes built for holiday let purposes? How will you count holiday let properties which have changed use to residential?

A11. Planning controls (e.g. conditions or legal agreements) imposed as a part of planning permission can be used to limit how tourist accommodation can be occupied. Planning applications for new tourism accommodation in the countryside are considered under Core Policies 39 and 40. Any holiday let properties that subsequently change use to residential may be deducted from a housing requirement for Large Village or Local Service Centre, where they are within or adjoin their settlement boundary.

Q12. For rural small settlements, without a neighbourhood plan, under the emerging local plan might there be a preference for mixed development (housing type and possible additional small scale employment) on brownfield sites outside/adjacent to a settlement boundary, as opposed to open space/garden infill, within a settlement boundary, consisting of pure residential development?

A12. The preparation of a Neighbourhood Plan is the best means by which a community can deliver its preference for the form and location of new development. In principle, however, the use of previously developed land is preferred over greenfield. A clear justification would be needed to set this aside.

Q13. The amendment to Policy 44 to promote community led development is positive, however being responsive to rural communities and their needs should not be limited to community land trusts (CLTs). Why does this policy limit schemes to CLTs?

A13. While the policy explicitly supports Community Land Trusts and allows for additional flexibility for the percentage of open market housing on such schemes (where it can be demonstrated they meet an identified need) the policy does also allow for other models of delivery through the first part of the policy on rural exception sites.

Feedback from previous consultation was that local communities in rural areas are supportive of more affordable homes being delivered in their local areas and see community led housing as a positive way of achieving this. However, they also identified a need for some flexibility in policy to allow a small proportion of open market housing to be considered as part of community led rural exception site delivery in order to encourage landowners to bring sites forward, and to meet an identified need for specific customer groups whose needs are not being met by developer led sites.

Q14. Why limit 'community-led housing schemes' to 5% of settlement and no more than 20?

A14. Through the work carried out so far, it is felt that the scale of development in relation to the size of the existing settlement remains an important consideration.

Q15. What is community led. Are private developers in addition to this?

A15. Community Led Housing is about local people taking a leading and lasting role in solving housing problems. The community must have meaningful involvement in the development; where the community group owns, manages or stewards the homes in a manner of their choosing; and the benefits to the community are clearly defined and legally protected in perpetuity. This does not exclude the local community working with private developers to deliver such projects.

Q16. How are the requirements of traveller's sites met within the context of the Plan within Large Villages, as the Empowering Rural Communities is silent on meeting this need?

A16. A separate consultation is taking place about Gypsy and Travellers. The consultation also ends on 9 March and further details can be found on our website at [Gypsy and Travellers - Wiltshire Council](#)

Q17. Since online has become the norm for shopping leaving many town centres empty or less shops. There are many houses or flats above shops etc that are empty. Can part of the housing needs be satisfied by bringing people to live back in the town centres where there is infrastructure already? Will you consider change of use for retail no longer needed in high streets or business/office units as changes to work patterns may add the vacant office space?

A17. The Local Plan Review [Emerging Spatial Strategy](#) document recognises that COVID-19 is having and is likely to continue to have substantial economic impacts on town centres and employment sites.

COVID-19 has accelerated the trend towards online retailing and services seen in recent years, which has been a direct challenge to the role of town centres as places to buy and sell goods.

The other effect of COVID-19 is the increase in home working, the reduction in net out commuting to other settlements and the boost in local demand for many goods and services.

On 1 August 2020, changes to Permitted Development Rights (PDR), which give property owners the right to develop their premises without applying for planning permission, in England provided further support to a change of use from office (formerly B1 use class) to residential (C3). From 31 August 2020, the demolition and rebuilding of 'vacant and redundant' office and light industrial buildings into dwellings is allowed without planning permission. However, prior approval must be sought from the local planning authority prior to commencement of the development.

Taken together, these factors create an opportunity to reconsider how we use town centres and how we adapt to greater home working, including improving broadband provision and changing transport usage. We welcome your comments during this consultation on how this might be achieved as we plan to deliver homes and employment land over the plan period, up to 2036.

While the [Wiltshire Retail and Town Centres Study](#) (2020) touches upon the potential effects of COVID-19 on town centres in Wiltshire, the evidence was collected prior to the first lockdown in March 2020 and should only be viewed as a baseline. The study predicts that COVID-19 is likely to have long-lasting effects on the UK economy and retail, leisure and other town centre uses. There will be a need for the Council to consider updates as part of the Local Plan Review process.

Q18. What do you mean by 'local need'? The housing requirement for the County is the 'local need'. Are you saying that homes in villages can only meet people who already have some connection with the village, and how does this provide for choice of housing in a range of locations, as required by the NPPF?

A18. At Large Villages housing requirements are identified consistent with their position in the settlement hierarchy to address housing needs in the rural area. This can be met in a number of ways as set out in proposed new core policy on Page 10 of the [Empowering Rural Communities](#) consultation paper. At Small Villages, the policy approach is limited to infill, but revised Core Policy 44 also allows for exception sites informed by evidence of local housing needs.

Q19. If small homes development is too restricted it is likely to impact on growing families forcing them to move as their family size grows.

A19. The National Planning Policy Framework requires the size, type and tenure of housing for different groups to be assessed and reflected in planning policies. Our current Core Strategy includes Core Policy 45 Meeting Wiltshire's Housing Needs, which will be reviewed to ensure that it is still an effective policy.

The Council is inviting people's views on whether extension of new small properties should be restricted and how this could be achieved. This point can be put forward in response to the consultation.

Q20. Will we ever be able to control dwelling size while stamp duty provides a financial incentive to 'extend not move'?

A20. Comment noted. Again, like Q19 this point can be put forward in response to the consultation question, which invites views on whether we should pursue an approach to restrict the extension of small properties.

While permitted development rights do allow for the extension of properties, in planning for new development it is important to ensure a mix of housing sizes are provided to meet future needs. Provision is made for this in the National Planning Policy Framework, which does allow planning policies to influence dwelling size of new housing.

Q21. Will Wiltshire Council be allocating any development sites for self-build properties?

Q22. Has Wiltshire Council used the data from its self-build register as part of the Local Plan Review?

A21, A22. The self-build register is one type of evidence that will be used to support the preparation of the Local Plan. Wiltshire Council is considering allocating sites or parts of sites for self-build housing. Within this consultation, the site proposals for the Principal Settlements include land for self and custom build.

Q23. Are you going to keep saved policy HC25 and if not why? It is important to ensure smaller houses are retained in the countryside in order to meet local need and there is little need for larger houses as opposed to smaller ones

A23. All the Core Strategy saved policies are being reviewed as part of the process for preparing the Local Plan. Where appropriate, policy HC25 will likely be included as part of the suite of housing policies in the Local Plan.

Q24. Does the definition of infill, see Core Policy 2 (Wiltshire Core Strategy), include conversion of existing buildings? The council has approved as infill conversion of stables, which is surprising as it was not infill in the sense of filling a small gap

A24. Core Policy 2 (paragraph 4.34) defines infill as the filling of a small gap within a village that is only large enough for not more than a few dwellings, generally only one. This could include conversions. It is also the case that there are permitted developments rights allowing the conversion of agricultural buildings to residential.

8 Housing Numbers/ Five Year Land Supply

Q1. Please can you tell us how many planning permissions for housing in Wiltshire have been granted, but the housing has yet to be constructed by developers. How does this impact the numbers of dwellings that need to be constructed during the plan period?

A1. As of 1 April 2019, around 14,590 dwellings are yet to be built that either have planning permission or are permitted subject to legal agreements being finalised. This number of dwellings is deducted from the total number of homes we need to plan for over the plan period.

Taking into account these dwellings with permission, others on land allocated for development and those dwellings that have already been built (over the period 1 April 2016 to 31 March 2019), out of a total need of up to 45,580 we need to plan for a further 17,000 dwellings approximately.

Q2. How can we find out exactly what plans have been included in the completions and commitments in table 2.7 in the document?

A2. The commitments can be found in the Council's 2019 Housing Land Supply Statement (HLSS). Large sites (10 dwellings and over) and Neighbourhood Plan allocations can be found in Appendix 1, and small sites (fewer than 10 dwellings) with permission can be found in Appendix 2 of the HLSS. It can be found on the Council's website at this [link](#).

Q3. Please can you confirm what the current shortfall is in the 5-year housing land supply? Please can you also explain why this is now being judged at a Wiltshire wide level? There are concerns among the community that certain communities will need to make up the shortfall for other areas.

A3. The current supply of deliverable housing sites is 4.56 years. As defined in [paragraph 65](#) of the National Planning Policy Framework, the Council should establish a housing

requirement figure for their whole area, which shows the extent to which their identified housing need can be met over the plan period.

However, the Council does monitor delivery and supply of homes at a more localised level, both at housing market area and the main settlements. A decision on an individual planning application is determined on its merits. The delivery of new homes and supply of housing sites locally is a material consideration.

Q4. Worried about having a minimum of 45,600 as this does not determine what might happen if developers decide they want to just keep building. We should have a maximum as well.

A4. The Council must ensure forecast needs for new homes are met over the plan period and maintain a supply of deliverable housing sites. The Council has forecast a range and is testing a maximum. It would not however be practical or appropriate for the Council to set a ceiling on the scale of new homes in the county.

Q5. As many know, Wiltshire is currently failing its 5-year land supply requirement. This in turn means that existing Neighbourhood Development Plans (NDPs) more than 2 years old are not being considered and applications that may previously have been refused with reference to the Core Strategy and NDPs stand a better chance of success. What are you doing to protect residents from inappropriate development?

A5. In the short term the Council will need to improve supply by granting permission for applications where there are no major policy obstacles. The Council will also continue to work positively with developers on existing complex applications on key strategic sites and continue to assist local communities develop Neighbourhood plans which may allocate further suitable land to meet those communities' needs. Even where neighbourhood plans are more than two years old this does not mean they have no weight in decision making, policies can still be considered.

In terms of plan-making, a plan-led approach to development is the best means to avoid speculative and ad hoc housing proposals. It is therefore important that we continue to progress the Local Plan Review as quickly as possible in order to identify new sites to meet housing requirements.

Q6. If homes get approved in a village before the Local Plan is adopted, do these homes get deducted from the total number of homes needing to be delivered?

A6. Yes. All additional homes built or permitted since 2016 should be deducted from the suggested requirements. In addition, an estimate of the number of homes on sites allocated in a neighbourhood plan or the Wiltshire Housing Site Allocations Plan, can also be deducted.

Q7. How will a review of the Housing Site Allocations Plan be carried out if a "large village" has already met its baseline indicative housing requirement (2016 to 2036)? Will this be done in collaboration with a parish council, or imposed by Wiltshire Council?

A7. If a Large Village has already met its housing requirement, it is not envisaged that a review of the Housing Site Allocations Plan will need to allocate any additional housing sites at that settlement.

Q8. Given the UK population is declining post Brexit in terms of growth rates are assumptions on houses needed still valid? Given that approximately 1.3 million people have left the country, reportedly because of Brexit and Covid, will the number of houses that Wiltshire is required to build come down?

A8. Rates of growth are based on household projections provided by the Office for National Statistics. Main components of the increase are to meet the increase in elderly households and net in-migration to the County from other parts of the UK. Housing needs will be updated as and when projections are updated.

Q9. What is the direction of travel of the 5yrHLS?

A9. Table 4 of the [Housing Land Supply Statement](#) published at the end of last year shows sites recently granted permission that will contribute to the future supply and help to address the current shortfall. Further progress will be made this year.

Q10. Can a small holding be made up of 2 plots under 1 owner?

A10. The Local Plan Review considers land parcels promoted for development often by a number of different owners.

Q11. Many large villages already appear to have met the bulk of their requirements (through completions and commitments etc), partly because the base date is 5 years ago. Won't that effectively constrain necessary sustainable rural growth?

A11. No. The objective of the plan is to meet forecast needs for new homes in the most appropriate places so as not to promote potentially unsustainable rates of growth. A purpose of a housing requirement is to help achieve this. It does not prevent additional housing development taking place where, for instance, this may meet a local need or where it is based on evidence and supported in a neighbourhood plan.

Q12. The process for calculating housing targets set out on pages 15/16 is still opaque - will this hinder communities from understanding and buying-into it? Example - for Tisbury (Local Service Centre in an Area of Outstanding Natural Beauty) the table on page 18 sets a requirement of 3 dwellings per annum. However, on page 19, the calculation for Tisbury is 6.75 dwellings per annum. How has the number of dwellings doubled between pages 18 and 19? Are there ways to make the calculation more transparent and accountable?

A12. Essentially, we have designed a model to help us disaggregate the housing requirements to each of the Large Villages and Local Service Centres, with the objective of being as equitable as possible.

The model takes into account the position of each settlement in the settlement hierarchy, the relative size of each settlement (both geographically and in terms of number of homes) and how each of them is affected by various constraints.

Under the current policy framework, the average Small Village delivers approximately 10 homes over a 20-year period through small scale infill development. It is reasonable to expect Large Villages to provide more homes than a Small Village and that Local Service Centres should provide for more than Large Villages. Therefore, the starting point for the calculations is that all Large Villages should, in theory, provide for at least new 1 home per annum and Local Service Centres should provide at least 5 homes per annum. The

remaining housing requirement for the relevant tier of settlements is then disaggregated and applied *on top of* these minimum requirements.

From the table on page 15 of the Empowering Rural Communities consultation document, in the Salisbury Housing Market Area 1,070 homes have been allocated to be met within the Local Service Centres (LSCs). This figure is derived from historic rates of housing delivery at the LSCs. Each of the four LSCs start off with a requirement of 100 homes (5 dwellings per annum) for the plan period. This leaves 670 homes to be distributed to the settlements, in addition to the initial 100 homes starting point, according to their relative size and how constrained they are.

The constraints are applied sequentially, cookie cutting each one from the settlement area as we go. This avoids double counting from overlapping constraints. We also include, in the calculations, a 100m area outside of the settlement boundaries to ensure that we capture the relationship with constraints that are in the immediate vicinity of the settlements.

Each constraint is given a baseline (per annum) housing requirement which represents a theoretical expectation for the average sized Large Village or Local Service Centre, if it was completely covered by that constraint and only that constraint.

These baseline requirements are therefore adjusted for each settlement, based on the proportion of a settlement affected by a constraint and its size relative to the size of the average settlement.

So, if an average sized Local Service Centre was wholly within an Area of Outstanding Natural Beauty (AONB), with none of the other constraints applying, the 3 home per annum baseline housing requirement for AONBs would be applied, unadjusted.

If we take Tisbury as an example (in the Salisbury HMA), the village area is partially overlain by Flood Zones, which have a housing requirement of 0, (because we shouldn't be building homes in the flood zones), and two of the constraints listed that have baseline housing requirements above 0, those being the Conservation Area (1 homes per annum) and the AONB (3 home per annum).

Working through the stages of the calculation:

- We start with a baseline requirement of 5 homes per annum (or 100 homes over the plan period) because this is the minimum expectation for all Local Service Centres.
- Approximately 15.5% of the settlement area is affected by Flood Zones. This part of the settlement area is cut out and given a base line requirement of 0.
- The model then goes through each of the constraints in the sequence until it finds the next one that overlaps with the remaining settlement area.
- In the case of Tisbury, the next constraint to apply is the Conservation Area. Conservation Areas have been given a base line requirement of 1 home per annum (remember that this is for a theoretical average village covered in its entirety by that constraint). Tisbury is the smallest of the LSCs in the Salisbury HMA and the Conservation Area only covers approximately 17% of the settlement area. The resulting baseline figure for the proportion of the settlement within the Conservation Area is adjusted accordingly, in this case to 0.1 homes per annum or 2 homes over the 20-year period.

- The next constraint to apply is the AONB, which covers the entire remainder of the settlement area for Tisbury. The AONB has been given a baseline requirement of 3 homes per annum, which is then also adjusted according to the relative size of the village and the proportion of the settlement area left after removing Flood Zones and the Conservation Area. This results in a requirement of 1.6 homes per annum, or 32 homes over the 20-year plan period for the remaining settlement area in the AONB.
- No other constraints apply, so the requirements for each of the constraints is added to the initial 100 homes baseline (100+0+2+32), and rounded to the nearest 5, which gives a housing requirement for Tisbury of 135 homes over the plan period.

Q13. Neighbourhood Development Plans (NDPs) may be central to your strategy but right now developers are successfully pursuing applications on land outside of NBPS because of the lack of the 5-year land supply, so how will your planning work in this climate? Surely this undermines the strategy particularly in rural areas.

A13. The current supply of deliverable housing sites is a material consideration for day to day decision making on planning applications and will be for the coming weeks and months. The Local Plan Review is looking over a longer-term horizon. Providing additional sites for new homes and setting local requirements will help to restore certainty.

Q14. As the NPPF requires a housing requirement to be given to all neighbourhood area designations, why has the consultation not provided one for settlements lower than large villages in the hierarchy?

A14. The baseline indicative neighbourhood plan housing requirements were calculated for rural settlements with defined limits of development (i.e. Local Service Centres and Large Villages), rather than settlements lower in the settlement strategy hierarchy because:

- It reflects the sustainable strategy for the rural areas in Wiltshire established in Wiltshire Core Strategy Core Policies 1 and 2 and the role of Local Service Centres and Large Villages, and
- It allows for infill development to continue to be delivered at Small Villages, in line with the Wiltshire Core Strategy, without having to meet a prescribed target.

A housing requirement should not be prescribed for Small Villages because infill, by its very nature, is a form of windfall development.

Q15. The Brownfield Land Register seems to be out of date e.g. land North East of Bythesea Road Trowbridge (former Library). Will the Plan represent up-to-date brownfield stock?

A15. The Brownfield Land Register (BLR) is produced in accordance with regulations prescribed by Government and is updated periodically. The BLR reflects land that the Council are aware of that meets these regulations. To be included on the register sites must be considered appropriate for predominantly housing. Land North East of Bythesea Road is likely to come forward as a mixed-use site and for this reason is not included.

The consultation proposes brownfield targets for Principal Settlements and Market Towns to help ensure as many homes as possible are built on brownfield sites. It is proposed that these will form the basis for housing requirements for neighbourhood plans at these settlements.

Q16. How can you justify an allocation of an additional 17.5% in a large village where facilities have already withered away?

Q16. Without knowing the Large Village in question, there may be a need for additional development to help sustain and/ or attract services and facilities.

Q17. Is sustainability served by not allowing any development in villages and letting their services wither away?

Q17. Sustainability is about achieving a balance between the right level of development and supporting/sustaining the necessary local services and facilities.

Q18. Will any sites in Large Villages be allocated for housing?

A18. Yes, sites will be allocated in Large Villages, further details including a draft Core Policy are included in the [Empowering Rural Communities](#) paper on page 10 and views are sought.

Q19. National planning policy does not allow affordable housing requirements to be applied to new housing developments of 9 or lower - will a policy specifying 5 or more be allowed in a new Local Plan?

A19. As explained in the [Empowering Rural Communities](#) paper, the five dwelling threshold currently applies to rural areas described under section 157(1) of the Housing Act 1985, which includes National Parks, Areas of Outstanding Natural Beauty and Designated Rural Areas. The Council is proposing to apply for this designation to extend to all qualifying rural areas of the county - i.e. parishes must have fewer than 3,000 people and a population density must normally be two people or less per hectare. For the remaining settlements, the threshold will remain at the higher level. Separately, whilst having regard to national policy the Council may also set out local circumstances with evidence to justify an exception to national policy.

Q20. What worries me is this reference to a 100m buffer to 'capture constraints within the immediate vicinity'. It sounds to me as though this would allow perpetual encroachment onto greenfield areas at village boundaries, which is not in line with environmental concerns. Will the 100-metre buffer be hijacked by property developers as extra room by which they can argue? Can you expand on what the 100m buffer zone is?

A20. The 100m buffer is not used as a means to allocate sites for development. It's used as a net cast around a settlement that makes sure we capture all the environmental constraints that we need to take into account when suggesting a housing requirement.

Q21. I would like to know whether Wiltshire Council will encourage the rehabilitation of 'brown' sites in preference to 'green' sites, providing whatever incentives are needed to entice developers to take on brown sites

A21. Maximising development that reuses previously developed land and limits the loss of greenfield land is a priority for the Local Plan. The proposed strategy includes a possible brownfield target for each main settlement (Principal Settlement and Market Town) - an indicative target for the number of homes to be built over the next ten years using brownfield land. The [Emerging Spatial Strategy](#) document explains the approach and role of brownfield land as part of the delivery strategy. Views are sought on this approach.

Q22. Will the data used to calculate the distribution of housing to large villages be available to view? The number of houses in Bratton was mixed up with Dilton Marsh in the WHSAP consultation and despite repeated attempts it was never corrected.

The data has been checked and there is no mix up between the different settlements. Baseline information can be provided on request.

Q23. As there is no agreed methodology for distribution of housing in the rural area, have you compared your allocations with that of another Council area?

A23. In developing the methodology, we reviewed approaches taken by other Councils as well considering the outcome of the consultations with the parish councils during 2019 where we tested an earlier method.

Q24. If sites in settlements not subject of a NP are to be allocated in Site Allocation Plan Review there will be a delay. Have you considered allocating in a single Local Plan Review?

A24. A community may wish to bring forward a housing scheme without preparing a neighbourhood plan. In these circumstances a neighbourhood development order or planning application would be considered solely against policies contained in the Local Plan. The proposed new Core Policy (page 10, [Empowering Rural Communities](#)) recognises that a review of the Wiltshire Housing Site Allocations Plan may be necessary in due course.

Q25. Will scale of housing sites in small villages be limited as current Core Strategy?

A25. The proposal explained in the [Empowering Rural Communities](#) document is that in small villages infill will still apply as it does now, with the ability to bring proposals forward in line with the revised Core Policy 44 as set out in the document. No housing requirement is suggested, it will be for the local community to determine themselves, what housing proposals are appropriate for their area so long as they are in general conformity with the Local Plan. Views are sought as part of this consultation.

Q26. The Location of Development for small villages shows no development outside the village which elongates etc. What happens where there is not a 5-year housing land supply? Present approvals of Wiltshire Council have ignored policies and approved development outside the village in particular for Berryfield. What are you doing to obtain and keep a minimum 5-year housing land supply to enable you to ensure your Location of Development policy is adhered to?

A26. Proposals will continue to be considered in accordance with the development plan and appropriate weight given to its policies in situations where there is not a 5-year land supply.

In situations, as now, where five years' worth of deliverable housing land cannot be demonstrated the Council is seeking to improve supply by granting permission for applications where there are no major policy obstacles. The Council will also continue to work positively with developers on existing complex applications on key strategic sites and continue to assist local communities develop Neighbourhood plans which may allocate further suitable land to meet those communities' needs.

Q27. How many houses will Pewsey and /or Pewsey community Area be required to provide?

A27. The Pewsey area is part of the Swindon Housing Market Area. The housing requirement figures are set out in the [Empowering Rural Communities](#) document and relate to settlements within the area rather than the community area as a whole. Pewsey is a Local Service Centre and 145 houses are proposed. Burbage, Great Bedwyn, Shalbourne and Upavon are Large Villages and have proposals for 85, 30, 25 and 50 houses respectively.

Q28. Is it correct that you propose exceeding the government requirement by 5000 homes?

Q29. Please can you clarify Wiltshire Council's approach to assessing the housing need of the county. I have heard that Wiltshire plans to exceed the housing need, as assessed by the governments standardised methodology, by a reasonable level. Please can you explain the rationale behind this.

A28 / A29. The Government's standard methodology for new homes is a minimum figure that Wiltshire Council must Plan for. The current consultation we are undertaking suggests that Wiltshire will need between 40,840 and 45,630 new homes. The lower figure reflects the standard methodology and the higher figure reflects forecasts that suggest Wiltshire will need more homes to balance jobs with the working age population to avoid people travelling into the county for work. The reasons for this higher figure are set out in evidence published as part of the consultation (see [Local Housing Needs Assessment 2019](#)). The consultation is based on the higher figure and shows how this could be distributed across Wiltshire.

We are also aware that the Government's standard method figure is subject to change over the Local Plan period as household projections and data on affordability of homes are updated every two years. As such, planning for a higher figure builds in contingency over the timeframe of the plan.

Q30. The local plan identifies housing requirements in each of the large villages. What are the requirements for the smaller (unsustainable) villages? Does their exclusion from the plan mean there is no requirement for small villages to identify areas for housing?

A30. The proposal explained in the [Empowering Rural Communities](#) document is that for small villages, the local community will determine themselves, without a requirement, what housing proposals are appropriate for their area, so long as they are in general conformity with the Local Plan. Views are sought as part of this consultation.

Q31. Will the Local Planning Authority consider Green Belt release to ensure vitality of rural villages where there is insufficient brown field land available?

A31. At this stage, Wiltshire Council isn't considering a review of the Green Belt to release land for development as the National Planning Policy Framework states that land should only be released in very exceptional circumstances.

Q32. Are you suggesting that in those areas where the housing need has been met no more allocations will be made up to 2036?

Q33. Please can you confirm the anticipated approach if an identified housing need (for a rural settlement) has almost been met? For example, Urchfont has a baseline

requirement for 2016-2036 of 65. Completion and commitments appear to be 60. Does this mean once 5 more houses are built, no more will/can be built up until 2036?

A32 / A33. Based on the indicative housing requirements and the number of completions and commitments so far, then in some cases the remaining indicative housing requirement is very low or zero and, in these instances, no more allocations would likely be needed as development within the settlement boundary on sites is likely to meet or exceed this (see proposed new Core Policy, page 10 [Empowering Rural Communities](#) document). However, this would not preclude further allocations or sites being brought forward should the community wish to do so through a neighbourhood plan or in line with revised Core Policy 44 because local evidence suggests that more housing should be planned for.

Q34. We are constrained by an airfield & it's flightpath, why is this not considered under your list of constraints?

A34. Airfields and flightpaths aren't considered to be a constraint of the type set out in the National Planning Policy Framework and so haven't been included. If there are specific reasons why you consider it should be a consideration, please provide further details in responses to this consultation.

9 Neighbourhood Planning

Q1. What proportion of large villages have either a neighbourhood plan in place or are in the process of developing one? How many large villages do not have a NHP? What happens if an area doesn't have a Neighbourhood Plan? The implication from what I've heard suggests that some areas don't have them and are reticent about producing one.

A1. 58% of large villages in Wiltshire Council have been working on a NP of which 34% of those have a made neighbourhood plan. There is no requirement on a Parish Council to prepare a Neighbourhood Plan. Existing planning policies for the County as a whole, such as those in the Wiltshire Core Strategy and the Local Plan Review in due course will continue to apply. If there is a strategic need to allocate land for housing development then its scale and location may be determined by Wiltshire Council, as a part of reviewing the Wiltshire Housing Site Allocations Plan. The Parish Council and community would be consulted as a part of its preparation.

Q2. Can you confirm in calculating the residual housing requirement, whether the committed developments include any sites allocated within a Neighbourhood Plan in that area (but may not yet have planning permission)?

A2. Yes. The number of new homes estimated on sites allocated in a neighbourhood plan are counted as committed development.

Q3. If a "large village" has already met its baseline indicative housing requirement (2016 to 2036), but doesn't think it can undertake the complex, lengthy and expensive process of developing a neighbourhood plan, how will this disadvantage the community?

A3. It is entirely at the discretion of a Parish Council whether or not to prepare or review a neighbourhood plan. If a Large Village has already met its housing requirement, it is not envisaged that any additional housing sites will need to be allocated other than any that might meet a local need, and these may be accommodated by an 'exception site' scheme in line with the proposed revised Core Policy 44. A community is not disadvantaged in that sense.

Q4. What was the purpose of the Neighbourhood Plan (NP), which was set for 10yrs, when your plans now, are overriding this? What happens if an NP is different to the proposed new local Plan? Will it take away the weight?

A4. By law neighbourhood plans must generally conform to the Local Plan's policies and proposals. Local Plans must also be kept up to date and reviewed at least every five years.

Nevertheless, it is not as simple as saying the Local Plan will over-ride neighbourhood plans. The Local Plan Review process looks further ahead. Neighbourhood Plans may then take account of the additional needs this involves, such as for new homes. Most of a neighbourhood plan is likely to be unaffected since, for instance, policies on design, protecting green spaces and heritage will not need review or alteration because of the Local Plan Review.

Q5. How useful will a housing needs survey be if it is carried out in a "large village" that has no neighbourhood plan?

A5. A local housing needs survey can provide important evidence in support of a community-led housing scheme. This could be delivered by a planning application as an exception scheme in line with the proposed revised Core Policy 44.

A local housing needs survey can also be a useful aid to considering whether it is worthwhile doing a neighbourhood plan and what alternatives courses might be better.

Q6. Are the numbers to rural areas a minimum or a target? What if a NP area wants to bring forward development in excess of whatever number is defined in the local plan?

A6. The housing requirements are not considered to be a ceiling for the purpose of neighbourhood plans. However, there would need to be clear justification as to why a requirement should be exceeded based on local evidence and the objectives of the neighbourhood plan.

Q7. How will communities be motivated to make the huge effort to write, review or renew neighbourhood plans when, as now, they have a life of only 2 years, less time than they take to make? How often does Wiltshire Council expect a Neighbourhood Plan to be refreshed?

A7. Neighbourhood plans do not have 'a life of only 2 years'. They are not suddenly out of date because of the Local Plan. Most policies will be completely unaffected because they deal with matters like Local Green Space or design, which at a local level would be unaffected by strategic policy changes.

A review or renewal of a neighbourhood plan need only update those policies that are no longer useful or need to be amended. This should reduce the effort and time involved.

The scope of the review will vary from plan to plan, depending on what the Qualifying Body (QB) want to achieve, how many policies they want to amend, remove, add or replace. The QB do not have to make changes to all the policies – they can decide which parts need an update – if any.

Q8. Our parish has carried out a housing needs survey identifying a need of 11 homes, how can the process for making local neighbourhood plans be made simpler and how can a parish council try to overcome division and opposition to new housing in its community?

A8. A neighbourhood plan becomes part of the development plan when it is 'made' and must follow legal steps set down in regulations during its preparation. The Council provides link officers to give individual support to each neighbourhood planning group and help clarify the process.

Early engagement with as many people as possible can help to make everyone aware of the issues that preparing the plan will go on and tackle. This can help to defuse misconceptions and help to reduce tensions that may arise later in the process.

Q9. Will there be support, including financial support, when we review and amend our neighbourhood plan? Are grants still available to help with the cost of making or revising Neighbourhood Plans?

A9. Yes, there is financial support available. A main source of information about this can be found on the [Locality website](#).

Q10. Going forward will Neighbourhood Plans (NP) be required to meet the designated housing allocation, rather than need local housing need as determined from evidence gathered whilst making the NP?

A10. Neighbourhood plans must generally conform to the Local Plan. The Local Plan will contain housing requirements for Large Villages which neighbourhood plans will need to address. This requirement is set to help support the strategic role of a settlement. Meeting a local housing need, where it is identified, can be a component of addressing strategic requirements.

Q11. At what stage in the process is an emerging Neighbourhood Plan considered "Made"? Reg 16 Consultation ended for our plan on 5th Nov 2020. Is this therefore classed as "made"? If a neighbourhood plan has been 'made', can the Council override the site identification and allocate more development?

A11. A neighbourhood is 'made' by Wiltshire Council. It is a legal step at the very end of the process after a successful referendum result. A draft plan is prepared to go through for examination (under regulation 16) at this stage the plan is not 'made'. If the neighbourhood plan has identified sufficient sites to meet the housing requirement in the Local Plan then there should be no need for additional sites to be allocated by the Council in a future plan.

Q12. About the indicative housing requirements for large villages (as it affects Sherston village): the baseline housing requirement 2016-2036 is 55. The Completions (2016-19) and Commitments (presumably from the Neighbourhood Plan) amount to 56. Does that mean that if Sherston delivers the housing in the NP, we have met the housing requirement to 2036?

A12. Yes, that is correct.

Q13. If a neighbourhood plan in progress doesn't include consideration for housing allocation sites does it need to reconsider this and include it?

A13. The answer depends upon the time horizon of the plan being prepared.

If the plan horizon is 2026 then it does not need to reconsider its current position on the need (or not) to allocate land for housing. It may be necessary to consider reviewing the housing section of the plan once the Local Plan Review is adopted.

If the plan horizon is later than 2026 then it would be sensible for plan preparation to consider how it will need to address the suggested housing requirement. This will vary from plan to plan and the Council can provide advice.

Where strategic policies set out a housing requirement figure for a designated neighbourhood area, the neighbourhood planning body does not have to make specific provision for housing or seek to allocate sites to accommodate the requirement. However, if monitoring evidence indicates that there is strategic need to allocate more land to meet forecast housing need in a rural area, then the Council may consider reviewing the Wiltshire Housing Site Allocations Plan. The proposed new Core Policy set out in the Empowering Rural Communities document describes how this process would be triggered.

Q14. If a small village does not already have a Neighbourhood Plan or one in preparation, would your advice be to create one?

A14. There are many benefits to preparing a neighbourhood plan. Whether it is advisable to do so depends on what outcomes the community wants to pursue. A range of aspects would merit preparing a plan. A single issue, for instance like a local housing need, may be met more straightforward by working up a scheme to a planning application on an exception site in line with the proposed revised Core Policy 44.

Q15. Congratulations on the support you are rightly giving for neighbourhood plans and community land trusts in rural areas. The support given to Community Land Trusts for the provision of housing which is permanently affordable in revised Core Policy 44 is very strong. Where a Neighbourhood Plan exists, could the Local Plan give further support by indicating other specific areas where the Neighbourhood Plan (and the wishes of the local community) should take precedence?

A15. The [Empowering Rural Communities](#) document focuses on meeting on local housing needs. This will not preclude consideration of other areas as work on the plan progresses. It would be helpful to know what other areas the plan could help to support local communities.

Q16. If we need to review the Neighbourhood Plan (NP), how do we incentivise volunteers to put in the considerable time and effort required given the lack of validity a NP has over 2 years old, given Wiltshire's inability to demonstrate a 5-year land supply.

A16. Neighbourhood Plans do not have a life of 2 years. Neighbourhood Plans can deal with matters like Local Green Space, heritage, landscape and design, green infrastructure, community facilities, housing allocations, renewable energy, amongst others, all of which

can help to realise a community's own vision for its area. These would be unaffected by strategic policy changes or how the housing land supply position changes over time.

Q17. In a small village, when creating a neighbourhood plan (NP) - does the council have a view about the balance between villager view, NP Group and parish council?

A17. Neighbourhood planning gives communities direct power to develop a shared vision for their neighbourhood and shape the development and growth of their local area.

Plans should be prepared positively, in a way that is aspirational but deliverable.

Neighbourhood Planning is led by the parish council who should work with other members of the community who are interested in, or affected by, the neighbourhood planning proposals to allow them to play an active role in preparing a neighbourhood plan.

Q18. Our parish is entirely within greenfield Area of Outstanding Natural Beauty and the draft Local Plan for an adjacent town proposes a very large urban sprawl into our parish. This has not been discussed at all with our parish and would break the rural numbers guidelines you have shown this evening. We are in the early stages of preparing a Neighbourhood Plan but is this any defence against such rule sprawl?

A18. The Local Plan has not yet been drafted. This is an initial stage before drafting its content. Preferred sites and pools of potential development sites are suggested at the main settlement and parishes that may be affected are invited to comment on their suitability.

Housing requirements are suggested for individual settlements (Main settlements, Large Villages and Local Service Centres) and not parishes. They apply to the built-up area of these settlements and inevitably may require an urban area to expand using one or more of the sites shown in the consultation material.

Q19. After years of finally getting our Neighbourhood Plan “made” the prospect of a review, especially under the current circumstances, feels totally exhausting. How simple can a review be please?

A19. A recently 'made' Neighbourhood Plan would be likely to need less change to it than others since it will be so up to date. A review or renewal of a neighbourhood plan need only update those policies that are no longer useful or need to be amended. This should reduce the effort and time involved.

Most policies will be completely unaffected because they deal with matters like Local Green Space or design, which at a local level would be unaffected by strategic policy changes.

Q20. Once a neighbourhood plan has been updated and reviewed will it have to go back for a referendum?

A20. The scope of the review will vary from plan to plan, depending on what the Qualifying Body (QB) want to achieve, how many policies they want to amend, remove, add or replace. The QB do not have to make changes to all the policies – they can decide which parts need an update – if any.

The nature of any proposed changes or modifications will affect the process that the neighbourhood plan will need to go through when being reviewed. Changes to planning law make it easier to modify neighbourhood plans and there are 3 types of modifications which

can be made to a neighbourhood plan or order, which is dependent on the degree of change.

If a qualifying body wish to make modifications that do materially affect the policies in the plan they should follow the process as set out in guidance^[1]

^[1] Para 106 [Planning Practice Guidance](#) on Neighbourhood Planning

Q21. What is Wiltshire’s view on Neighbourhood Development Orders?

A21. Wiltshire Council has provided support to preparing Orders in the County and, in principle, continues to do so. For example, the Cherhill Village Hall Community Right to Build Order.

Q22. Our parish, 270 houses in total, comprises 5 small villages. How do we afford a neighbourhood plan and what would we achieve given that each village has entirely different needs?

A22. It is important to first have an idea of what these needs are and then to consider whether these are needs that are best addressed through a neighbourhood plan or some other mechanism, such as a neighbourhood development order or a village design statement. Financial support is available for neighbourhood planning groups. Further information can be found on the [Locality website](#).

Q23. What would be the ballpark cost be of a Rural Housing Needs Survey?

A23. Wiltshire Council’s Housing Strategy Team can support the preparation of housing needs surveys for individual parishes at no cost (to the parish). For further information, contact housing.strategy@wiltshire.gov.uk.

Q24. What are the implications for the timing of a Sites Allocation Plan Review for site allocations if a local community is not preparing a Neighbourhood Plan? Have the Council considered including such allocations in the Local Plan Review?

A24. There are currently no plans for a review of the site allocations plans for either Chippenham or the rest of Wiltshire. It will be through monitoring the housing land supply position and delivery against the requirements in the Local Plan Review that will trigger the need for the Council to consider making allocations in rural settlements where there is a strategic need to do so and there is no prospect of this being delivered through the neighbourhood planning process.

Q25. From our previous experience, a "small village" may not be considered for development due to core policy, even when a housing need has been demonstrated by a housing needs survey and it has local support including the parish council. Are you now saying that provided there is a Neighbourhood Plan then the Wiltshire Planning Authority are duty bound to be more openminded to the proposal?

A25. A neighbourhood plan can allocate development above the indicative residual requirement for the area. However, the type and location of development must still be in conformity with Core Policies 1 and 2 of the Local Plan (Core Strategy). For example, types of development in accordance with exceptions policies, listed in paragraph 4.25 of the Local Plan (Core Strategy).

Q26. What support will Wiltshire Council give to parishes who do not have a NP?

A26. If a neighbourhood plan is considered an appropriate option for what the parish is hoping to achieve, then Wiltshire Council can advise and assist parishes with establishing a steering group if one has not already been set up and provide general advice to support them in preparing their plan. Advice on other planning mechanisms, such as neighbourhood development orders or village design statements, can also be discussed if parishes do not wish to pursue a neighbourhood plan.

Q27. In a rural area such as Wiltshire with many village settlements, leaving the prospects for growth at sustainable settlements to the lottery of whether or not the community galvanises to prepare a Neighbourhood Plan is not a sound approach, and does not reconcile with the NPPF requirement for planning policies to identify opportunities for villages to grow and thrive. It is a strategic matter that necessitates allocations through the Local Plan, and to provide housing choices not just for the existing community in a settlement which discriminates against those who aspire to village life.

Q28. Some Neighbourhood Plans are prepared as a defensive mechanism to resist further growth. This will have negative consequences for some settlements and is inconsistent with the NPPF requirement to allow for villages to grow and thrive. How will the Local Plan ensure the NPPF requirement is met?

A27 / A28. As set out in the proposed new Core Policy (page 10, [Empowering Rural Communities](#) document), it is recognised that the Council may need to allocate sites. This may be achieved through a review of the Wiltshire Housing Site Allocations Plan or Local Plan where there is a strategic need to do so and there is no prospect of this being delivered through the neighbourhood planning process.

Q29. If a Neighbourhood Development Plan is more than 2 years old what is the process for submitting minor revisions? More guidance is needed on what to review in a Made plan - how do we know what to review?

A29. Minor (non-material) updates to a Neighbourhood Plan or Neighbourhood Development Order would not materially affect the policies in the plan or permission granted by the Order. A local planning authority may make such updates at any time, but only with the consent of the qualifying body. Consultation, examination and referendum are not required. To reduce the likelihood of a neighbourhood plan becoming out of date, communities preparing a neighbourhood plan should take account of latest and up-to-date evidence of housing need. The Council will prepare guidance to help communities review their plans.

Q30. If possible, please could you share the example Neighbourhood Development Plan that was referred to that includes a mixed-use allocation that reserves land for a GP surgery?

A30. This is the Sherston and Hindon Neighbourhood Plans which are available on the Council's website.

Q31. Who pays for the Neighbourhood Plan?

A31. Financial support is available for neighbourhood planning groups, but the cost of producing the plan is largely borne by the relevant town or parish council. Further information can be found on the [Locality website](#).

Q32. Our small village is working on a Neighbourhood Plan, is it sensible to include site allocation in the plan even if there is limited scope for development?

A32. It is important to consider what you want to do with your neighbourhood plan and the potential development opportunities to facilitate your aims, and whether this would be in line with strategic policy for small villages. You may want to address the future of a specific area of land and what type and amount of development might be considered acceptable to the village in the future.

Q33. Not really a question but more a comment on how can Bremhill parish local plan be totally overridden by current housing plans for Chippenham

Q34. Why does WC think it perfectly acceptable to ignore a 'made' NDP if that plan does not tie-in with where WC wishes to allocate housing?

Q35. Will the new Plan respect existing approved Neighbourhood Plans drawn up by villages?

Q36. For large villages situated adjacent to (say) a principal settlement, will the adopted Neighbourhood Plan be worth the paper it is written on, or will WC simply 'enlarge' the village to suit its own needs?

A33 / A34 / A35 / A36. The Local Plan review process will consider made neighbourhood plans and these have been taken into consideration in looking at potential development sites at Principal Settlements and Market Towns set out in this consultation. However, neighbourhood plans must be in general conformity with the Local Plan. Where local and neighbourhood plans have conflicting policies, it will be the more recent plan that will carry more weight. So, to avoid the risk of policies in a neighbourhood plan being superseded by a later local plan, it is necessary for the two plans to work in a complementary way.

Q37. How can we get help with undertaking a local housing needs assessment? Should we do this independently or will such assessments be better undertaken by Wiltshire Council and how do we find out how do ask for this to happen?

A37. Wiltshire Council's Housing Strategy Team can support the preparation of housing needs surveys for individual parishes at no cost (to the parish). For further information, contact housing.strategy@wiltshire.gov.uk.

Q38. If Wiltshire does meet its 5-year plan, will this then mean that made NPs are considered as more relevant - we understand that they are not as strong in considering housing numbers if there is not a five-year supply?

A38. If the local planning authority cannot demonstrate a five-year housing land supply of deliverable housing sites, a neighbourhood plan may benefit from the protections set out in paragraph 14 of the [National Planning Policy Framework](#). Paragraph 14 states that the adverse impact of allowing development that conflicts with the neighbourhood plan is likely to significantly and demonstrably outweigh the benefits provided the neighbourhood plan:

- Became part of the development plan 2 years or less before the date on which the decision is made;
- Contains policies and allocations to meet its identified housing requirement; and
- The local planning authority has at least a 3 year supply of deliverable housing sites and
- the housing delivery was at least 45% of that required over the previous 3 years.

Q39. Will Wiltshire Council support and enable the production of Neighbourhood Plans by smaller Parish Councils e.g. less than 150 people

A39. Specific circumstances can be discussed with Wiltshire Council. However, it is worth considering whether a joint neighbourhood plan with neighbouring parishes is a possibility in these cases.

Q40. If a large village has already met its baseline indicative housing requirement (2016 to 2036), but doesn't think it can undertake the process of developing a neighbourhood plan, how will this affect the community from a planning perspective?

A40. Planning applications will continue to be judged against policies within the Local Plan (currently the Wiltshire Core Strategy) and against the Council's current five-year housing land supply position. However, preparing a neighbourhood plan that includes housing allocations will provide communities greater say in the location and type of future development and afford them better protection against speculative development.

Q41. How useful will a housing needs survey be if it is carried out in a large village that has no neighbourhood plan?

A41. A housing needs survey could be used as part of the evidence base to support the case for preparing a neighbourhood plan and to support the inclusion of housing allocations to meet locally identified housing needs. For further information, contact housing.strategy@wiltshire.gov.uk.

Q42. How will a review of the Housing Sites Allocation Plan be carried out if a large village has already met its baseline indicative housing requirement but has no neighbourhood plan? Will this be done in collaboration with the parish council, or imposed by Wiltshire Council?

A42. The Local Plan review is not looking to allocate land in rural settlements as overall housing needs will be met at the main settlements or through new neighbourhood plans/neighbourhood plan reviews. If monitoring evidence indicates that there is strategic need to allocate more land to meet forecast need, then the Council may consider reviewing the Wiltshire Housing Site Allocations Plan. The proposed new Core Policy set out in the [Empowering Rural Communities](#) document describes how this process would be triggered.

Q43. Will a review of a Neighbourhood Plan require a further public consultation and vote to approve?

A43. This depends on the degree to which it is proposed to change the neighbourhood plan. Minor modifications would not require examination or a referendum. Major changes that may or may not change the nature of the neighbourhood plan may require an examination and/ or referendum.

Q44. Will small, unsustainable villages be required to produce a Neighbourhood Plan - or otherwise have housing requirements imposed? Our small village has no plans to make a neighbourhood plan. If we do not make one what are the consequences?

A44. There is no requirement to prepare a neighbourhood plan. Planning applications will continue to be judged against existing policies within the Local Plan (currently the Wiltshire Core Strategy). However, preparing a neighbourhood plan will provide communities greater say in the location and type of future development.

Q45. The Holt Neighbourhood Plan has failed to deliver affordable and market housing how will the Local plan remedy this?

A45. If monitoring evidence indicates that there is strategic need to allocate more land to meet forecast need, then the Council may consider reviewing the Wiltshire Housing Site Allocations Plan. The proposed new Core Policy set out in the [Empowering Rural Communities](#) document sets out how this process would be triggered. However, there is a process for reviewing neighbourhood plans that might also be considered by Holt Parish Council, with support from Wiltshire Council.

Q46. Will the Local Plan require Neighbourhood Plans to deliver housing allocations where there is a deficiency?

A46. There is a preference for neighbourhood plans to deliver housing allocations in rural areas. However, if monitoring evidence indicates that there is strategic need to allocate more land to meet forecast need, then the Council may consider reviewing the Wiltshire Housing Site Allocations Plan. The proposed new Core Policy set out in the [Empowering Rural Communities](#) document sets out how this process would be triggered. However, there is a process for reviewing neighbourhood plans that might also be considered.

Q47. What about those Neighbourhood Plans that have already been made and have not made enough allocations for affordable and market housing - will the Local Plan address this?

A47. In this case, a review of the existing neighbourhood plan could be considered if new housing sites are needed to meet the proposed requirements set out in the Local Plan Review. However, if monitoring evidence indicates that there is strategic need to allocate more land to meet forecast need, then the Council may consider reviewing the Wiltshire Housing Site Allocations Plan. The proposed new Core Policy set out in the [Empowering Rural Communities](#) document sets out how this process would be triggered. However, there is a process for reviewing neighbourhood plans that might also be considered.

10 Infrastructure

Q1. It isn't just about housing but also getting the shops and connectivity to other areas, cycle route, bus services etc.

A1. The Local Plan Review, like the Wiltshire Core Strategy, looks to support the role of rural settlements in providing local services and facilities by a modest number of new homes that may also help to meet local needs.

If a neighbourhood plan seeks to allocate land for housing development this is the means to locate new homes where they well connected to services and facilities.

Q2. Communities are concerned about the capacity of doctor's surgeries and the capacity of other infrastructure in rural areas. Please can you confirm how these concerns are being tackled as part of the Local Plan review?

A2. We will continue to liaise with infrastructure providers as we prepare the plan. They are also invited to comment formally on the consultation material.

We recognise limited provision of infrastructure in rural areas. We suggest quite modest rates of housing development that are either less or the same as recent years.

At the same time, by having a plan that designates settlements as Large Villages, we signal to service providers and the market what settlements would be suitable to maintain or focus their investment. Together with a modest number of new homes this can help a community thrive.

Q3. Rural areas contain unused rural buildings, some have potential for reuse for employment, tourism and accommodation. Core Strategy policy 48 sets a very high bar. Will you look at this again to allow more flexibility and prevent dereliction?

A3. The objective of Core Policy 48 is to set a 'high bar' to prevent the loss of commercial and business premises to a residential use. Re-use for employment is generally preferred. The effectiveness of Core Policy 48 will be reviewed as a part of further work preparing the plan.

Q4. Can support for rural bus services etc be addressed in this plan process?

A4. Support for bus services is addressed indirectly by support, such as by a modest number of new homes, that can support the role of Large Villages and the services that connect to them.

Alongside the Local Plan, Local Transport Plan 4 is being prepared that will consider public transport in the rural areas.

Q5. If better public transport is provided how are you going to persuade people to use it? Who is going to spend an hour on public transport when a journey can be done in 10 minutes by car?

A5. Support for bus services is addressed indirectly by support, such as by a modest number of new homes, that can support the role of Large Villages and the services that connect to them.

The first objective is to maintain existing bus services that are essential to those in the community who do not have access to the private car.

Alongside the Local Plan, Local Transport Plan 4 is being prepared that will consider public transport in the rural areas, reducing the need to travel and strategies to encourage people to use more sustainable modes of travel other than the private car.

Q6. What increase in the population of Wiltshire are you assuming when calculating the 45,600 requirements for new homes and has this population increase been worked into the requirements for schools, hospitals etc?

A6. The [Swindon and Wiltshire Local Housing Needs Assessment 2019](#) explains the evidence and process which has led to a housing requirement of 45,600.

We have worked with the health services and our education colleagues to assess current capacity and the need for new services prior to this consultation. A summary of this information is included within the settlement profiles in the 'Planning for..' series of consultation documents for each of the main settlements. We will have further such discussions during and following this consultation as we prepare a draft plan.

We will also be updating the Wiltshire Infrastructure Delivery Plan (IDP) to accompany the draft plan. The IDP identifies the infrastructure necessary to deliver growth in the Local Plan (Wiltshire Core Strategy), including but not restricted to health and education facilities. The original IDP supported the draft Wiltshire Core Strategy and was then periodically updated to support further iterations and to reflect changing circumstances in terms of infrastructure requirements and delivery.

Q7. Are additional facilities - roads, doctors, tips, etc a prerequisite for approval?

A7. The infrastructure requirements necessary to make a specific development acceptable in principle will be determined through the planning application process. The granting of planning permission may involve the setting of planning conditions or the signing of a section 106 agreement requiring the provision of directly related infrastructure or contributions towards the provision of said infrastructure by an agreed date or threshold of development reached (e.g. number of units built or occupied).

Q8. Re small villages, can the plan truly reflect the very particular limitations of the village? This particularly refers to parking and highways and highway safety

A8. The Local Plan is a high-level plan that contains strategic policies to guide development across the County. There is the opportunity to provide locally specific policies and guidance for individual towns and villages through the neighbourhood planning process.

Q9. How do you assess the need for an infrastructure change such as an amendment to a HGV route from a commercial area?

Q9. The Council receives many complaints about Heavy Goods Vehicles (HGVs) as well as numerous requests for weight limits and other measures to restrict HGV movements. Unfortunately, it is not possible to undertake detailed surveys or studies and develop solutions for every HGV issue raised however, we have put in place a procedure to deal with all freight management requests. For further information, please read this document on the [Freight Management Requests procedure](#).

Q10. What provisions in social care are being made? This includes access to medical services - these services would need to be boosted and funded prior to additional homes coming on stream

Q11. The local housing needs are not being met by the number of hospital beds. How will the plan address the need to address the hospital capacity?

Q12. How will Wiltshire Council address the additional associated need for facilities and infrastructure e.g. schools, doctors where the existing ones are at capacity?

A10, A11, A12. We have worked with the health services and our education colleagues to assess current capacity and the need for new services prior to this consultation. A summary of this information is included within the settlement profiles in the 'Planning for...' series of consultation documents for each of the main settlements. We will have further such discussions during and following this consultation as we prepare a draft plan.

We will also be updating the Wiltshire Infrastructure Delivery Plan (IDP) to accompany the draft plan. The IDP identifies the infrastructure necessary to deliver growth in the Local Plan (Wiltshire Core Strategy), including but not restricted to health and education facilities. The original IDP supported the draft Wiltshire Core Strategy and was then periodically updated to support further iterations and to reflect changing circumstances in terms of infrastructure requirements and delivery.

Q13. With many houses being built in our area this has not been matched with appropriate infrastructure. Please can you confirm how you propose to assess the need for infrastructure in rural areas? Communities may be concerned how local services and facilities will cope with additional growth.

A13. As stated above, we will also be updating the Wiltshire Infrastructure Delivery Plan (IDP) to accompany the draft plan. The IDP identifies the infrastructure necessary to deliver growth in the Local Plan (Core Strategy), including but not restricted to health and education facilities. The original IDP supported the draft Wiltshire Core Strategy and was then periodically updated to support further iterations and to reflect changing circumstances in terms of infrastructure requirements and delivery.

Q14. A "Large Village" is actually two smaller areas within our parish and the remainder of the parish is in the New Forest National Park (NFNP). Will any houses built in the other part of the parish (i.e. within the NFNP) being taken into account as this will impact the parish as a whole in terms of extra pressure on the local primary school and extra pressure in traffic on the NFNP.

A14. To appropriately consider cross-boundary issues, it will be important for the Council to work together with neighbouring planning authorities and service providers, including the local education and highways authorities to plan for the development of rural settlements that fall across multiple local authority areas.

11 Climate change, the environment and biodiversity loss

Q1. Given that Wiltshire Council seeks to make the County achieve net zero carbon emissions by 2030, the 6th Carbon Budget requires a 68% reduction in emissions by 2030, and the country is committed to zero carbon by 2050, what are the carbon reduction targets that are set out in the Local Plan, and how will the Plan achieve them?

A1. The Council has declared a climate emergency which sets a challenging goal. The focus for this consultation is on what measures can planning policies employ to help reach it. Many possibilities are set out in the consultation document [Addressing Climate Change and Biodiversity Net Gain](#). Views and suggestions are invited.

Q2. What will be the status of saved policies on Special Landscape Areas? With the adoption of the emerging Local Plan, what will be the status of saved policies, such as policies on Special Landscape Areas and policies on coalescence that protect rural areas?

A2. The role and effectiveness of saved policies is being reviewed as part of the Local Plan Review, including those relating to the Special Landscape Areas. The main means to prevent the coalescence of settlements is the presumption against residential development outside settlement boundaries. Other forms and types of development are considered under policies that include the aim of preserving the character of rural areas.

Q3. Policy in rural areas protects the character and landscape etc. how do you explain why the emerging Spatial Strategy suggests huge swathes of rural, land outside settlement boundary in the AONB has potential for development especially round Marlborough?

A3. Marlborough is surrounded entirely by land designated as an Area of Outstanding Natural Beauty. Great weight is therefore attached to conserving and enhancing landscape and scenic beauty and protecting an area of particular importance. This does not mean that all development on the edge of the town is impossible or that some development in these locations will not be needed. Preparation of the neighbourhood plan for the town, for example, has identified a particular need for affordable homes. Consultation on a pool of potential development sites invites comment on which site(s) if any may be appropriate.

Q4. Given that all development will inevitably result in an increase in carbon emissions, both embodied and ongoing, how will the Local Plan ensure that any development incorporates the means to still deliver the radical carbon reductions that are required to achieve the net zero targets?

A4. Many possibilities are set out in the consultation document [Addressing Climate Change and Biodiversity Net Gain](#). Views and suggestions are invited.

Q5. Will biodiversity be mapped by the Council or by Neighbourhood Plans and will it be mapped ahead of sites being allocated for development.

A5. Conserving and enhancing biodiversity is an objective of the sustainability appraisal framework used to help select sites going forward. The process identifies likely effects from development of a site and suggests what mitigation may be necessary and its likely effectiveness. For sites selected for development, it is expected that a developer will be required to demonstrate a biodiversity net gain as a result of a scheme. Mapping the value of biodiversity on a site will be necessary as part of plan preparation and master planning in order to be assured that this can be achieved.

Q6. When are we going to discuss the issues of environment and climate change?

A6. The topic for this event was the future of rural settlements based around the document [Empowering Rural Communities](#). Another document published as part of the consultation is [Addressing Climate Change and Biodiversity Net Gain](#). Views and suggestions are invited on this.

Q7. Are there any plans to require new homes to have improved insulation standards, to have PV Solar installed, heatpumps and access to EV charging points? If not are we not storing up large retrofitting costs in the future?

A7. Such possibilities are set out and explored in the document [Addressing Climate Change and Biodiversity Net Gain](#). Views and suggestions are invited.

Q8. How relevant are Conservation areas these days in preventing housing development within the boundaries of those areas? Does the policy of designating inappropriate areas for houses as "Important open Space" still apply?

A8. The Council has a legal duty in its decision making to ensure special attention is paid to the desirability of preserving or enhancing the character or appearance of Conservation Areas¹. A highly effective means to protect open space that is important to the community is the designation of local green spaces and this can be done as part of preparing a neighbourhood plan.

Q9. What is the impact of AONB?

A9. An Area of Outstanding Natural Beauty (AONB) is one of the constraints taken into account when calculating a housing requirement figure for the rural villages and is a constraint when considering site allocations.

Q10. How could we and the council shape the policies to help biodiversity, address climate change and flooding increases?

A10. The consultation document [Addressing Climate Change and Biodiversity Net Gain](#) outlines the Council's current thinking on such matters and what type of policies can be included in the Local Plan. These policies may well go further than national policy with the consultation asking how far should and could we go.

12 Transport, sustainable and active travel

Q1. Given the heavy reliance on private cars for transport in rural areas, how does adding more housing there fit with the WC climate emergency declaration and target for Wiltshire to reach net zero carbon by 2030?

A1. The purpose of the Local Plan is to meet social and economic needs whilst protecting the environment. Housing development in rural areas is deliberately modest and focused on supporting the role of rural settlements and meeting local needs.

Q2. Why does it appear that road congestion and safety is not taken into account in selecting housing sites for consideration?

A2. No housing sites at rural settlements have been selected. Road conditions, safety and access are considerations that will be taken into account as a part of selecting and allocating any site for development. In rural areas it is anticipated that where sites may be needed for

¹ [Planning \(Listed Buildings and Conservation Areas\) Act, 1990, section 72 \(1\)](#)

new homes, these will be identified by neighbourhood plans, taking into account evidence on local traffic issues

Q3. Sustainable transport will require massive modal shift in terms of how we move ourselves around. How will the plan incorporate connecting settlements with safe cycling and walking routes?

A3. It is recognised that a massive modal shift will be difficult to achieve in rural areas. This is recognised in modest requirements for new homes in rural areas that are focussed on the larger rural settlements that have more services and facilities than others. The location of any additional sites for housing development, primarily by neighbourhood plans, can prefer sites that can be better connected by cycling and walking.

Q4. There are rural residents who do not own cars or cannot drive, and there will be increasingly many who do not want to run a car for climate reasons. Do policies proposed for rural communities focus on reducing the need for travel and address 'transport poverty'?

Q5. Do you also take into account any current or potential transport links and access to the larger villages and towns?

A4 / A5. Core Policy 48 of the Wiltshire Core Strategy, 'Supporting rural life', supports development proposals that focus on improving accessibility between towns and villages, helping to reduce social exclusion, isolation and rural deprivation, such as transport and infrastructure improvements. Core Policy 49, 'Protection of rural services and community facilities', supports the retention of rural services and community facilities. Core Policy 60, Sustainable Transport, supports the need to reduce travel by car, achieved through planning development in accessible locations and working with transport providers to maintain current transport access and links between villages and, also, to improve the local transport network.

Taken together, these policies help to support those who may not have access to cars, for whatever reason, by encouraging non-car methods of transport and protection existing services and facilities, thereby reducing the need to travel. However, the Local Plan Review will be considering where there are gaps in policy coverage, particularly considering climate change, and would welcome your views through this consultation on how these might be addressed.

Alongside the Local Plan, Local Transport Plan 4 is being prepared that will consider public transport in the rural areas, reducing the need to travel and strategies to encourage people to use more sustainable modes of travel other than the private car.

13 Employment land

Q1. What about small but highly destructive business developments in completely greenfield sites? At present there seems no way to prevent these even if in an AONB. I don't think mentioned in the Rural Communities strategy paper.

A1. There are no proposals for the Local Plan Review to allocate additional land for employment development in the rural area.

Q2. Is Wiltshire's housing/employment in balance or as in the Calne area is there a very large imbalance where housing growth has vastly outstripped employment leading to high proportions of unsustainable out commuting. The rural villages in this area are likely to have even higher levels of out commuting but even more housing is proposed.

A2. Inevitably in rural areas there is a reliance on the private car and greater need to travel. This is recognised in modest requirements for new homes in rural areas. These requirements are however focussed on larger rural settlements that have more services and facilities than others. This helps to support their role and reduce some needs to travel. It also helps to support the local economy and retain local jobs whilst meeting local housing needs.

Q3. Apart from adding houses are there any other plans to use rural areas between villages for commercial use or will this be targeted within the town boundaries?

Q4. The Empowering Rural Communities document seems to focus on housing. What is the policy about nursery business units in Large Villages where supply may be negligible to meet demand?

Q5. Empowering rural communities requires rural jobs, not just homes; will the 'rural chapter' provide more proactive approach than the consultation document where it is largely ignored?

Q6. I have not as yet heard any mention of where the people in all of the new houses are going to work. What are the WCC plans to ensure that all new householders have a job, or a job is available locally with minimal travel.

A3/A4/A5/A6. Core Policy 34 of the Local Plan (Core Strategy) aims to support the rural way of life through the promotion of modern agricultural practices, appropriate diversification of the rural economy and provision of broadband. This policy includes criteria to be met for proposals relating to the retention or expansion of existing business within or adjacent to settlements, including Large Villages. However, the Local Plan Review is looking at the effectiveness of existing policies and we would welcome your views through this consultation on where there may be gaps in the existing/ emerging policy coverage and evidence base and how best to address them.

14 Retail and the high street

Q1. The 5% limit / 20 homes would be likely to be welcomed particularly in AONB / conservation areas. How will the strategy 'join-up' with the predicted seismic changes that are happening in retail and the high street?

A1. Trends affecting town centres are largely influenced by changing shopping behaviour within the existing population and changing service decisions by providers and impacts from new development are relatively minor. The future role of town centres, the land use changes that might follow, is going to be a central piece of work for further plan preparation. A Town Centre and Retail Study commissioned by the Council provides important baseline evidence

and is available [here](#). Views and comments on this document are invited and will help shape work going forward.

Q2. There still seems to be lots of brownfield and under used retail ex space etc in towns - how will the changing shopping habits of the nation be reflected in forward planning?

A2. The Local Plan will review and update policies to reflect changes to national policy and legislation. Many of these changes at national level have been short term responses that will be able to have long term effects, such as the freedom to move between permitted retail space to restaurants or office uses without planning permission being an example. The long term impacts on each of our town centres are not yet clear, the [Wiltshire Retail and Town Centre Study 2020](#) identifies that the many town centres across Wiltshire have been able to provide different services to the local communities, reducing competition. Therefore, there is an emphasis on supporting the vibrancy and vitality of our town centres through the Local Plan review.

15 Design

Q1. The recently announced National Planning Policy Framework and National Model Design Code consultation airs the possibility for planning authorities to vary the National Model Design Code. Will Wiltshire Council look to strengthen the sustainability credentials of the local design code in terms of energy efficiency and building materials. Other counties such as Dorset have adopted excellent guides over 10 years ago. Wiltshire villages are being destroyed.

A1. A design guide can be an excellent tool to help ensure high quality design. We will look to build on the national design guide to provide guidance for Wiltshire. It is important that the distinctiveness of each of our settlements is also recognised. Many neighbourhood plans include design policies or provide design guides or codes that reflect their community's expectations.

Q2. Given the fact that self-builders build to higher standards of construction and quality of materials, should not the Council be actively promoting such construction, rather than reacting to the Register of Custom/Self-Builders (which appears to be not too well known)?

Q2. The Government wants more people to build their own home and has asked local authorities to identify demand for this in their own area. The Council has set up a register for people who are interested in building their own home, which is to be their sole or main residence. Please visit our website for further information on the Council's [self-build register](#). However, the Local Plan Review is an opportunity for us to consider and identify how we might do more to support self-build development and we would welcome your views on how this could be achieved.

Q3. What role will Village Design Statements (VDS) in Small Villages have in future? For small villages the VDS is a very important document that defines the character of the village. The VDS is also easy to maintain and update. Can the WC planning incorporate the VDS into the latest planning documents?

A3. Village Design Statements are a form of planning guidance to inform the design of new development. Their aim is to encourage developers and householders to design new buildings or extensions (and other elements such as fences and outbuildings) so that they are in keeping with existing local character. A key aspect of village design statements is that they are written and researched by local communities, with only advisory input from the Council, and so represent a community view of how new development should be designed in order to retain a sense of place. Wiltshire Council has prepared [guidance](#) and a [protocol](#) on producing village design statements.

16 Other, place-specific Questions

Q1. Why does the proposed housing figures for Derry Hill and Studley show only 2 houses have been built in our large village since 2016 - I can see a 53-house estate in Studley that has completed and occupied since 2016?

A1. There was an error in collating the figures in this instance and thank you for drawing it to our attention.

Q2. I have been assured by Wiltshire Council that SHELAA 3452 (Downs farm) has been listed. The original listing was recorded incorrectly but when I pointed this out I was told on the 9th December 2020 that the site was now listed correctly. Unless I am looking in the wrong place I am unable to see the listing. Can you confirm it is listed? if not can you explain why?

A2. The Council can confirm that 3452 is retained in its Strategic Housing Land Availability Assessment (SHELAA). The SHELAA is a database of land submitted to the Council where there are aspirations for the land to be allocated for development. Site 3452 is located at Gomeldon, which is classified as a Small Village in the Wiltshire Core Strategy. The proposed strategy for Small Villages is for infill and sites brought forward in line with proposed revised Core Policy 44 allows for exception sites predominantly for affordable housing where there is evidence of local need.

Wiltshire Council Local Plan

Rural live events Q&A sessions: responses

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