

Wiltshire Council **LOCAL PLAN**

Looking to the future

Main settlement 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 to attend. 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 relevant to each area. This was followed by a question and answer session. Participants were able to submit questions, many of which were answered during the 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 Section 2.
- 1.4 Following this is a section dedicated to each event, listing the questions and responses that are far more place-based and specific to an area. 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 some questions has been adapted to have greater inclusivity of a wider issue.
- **1.5** Representations on the consultation are most welcome and are encouraged to be made through our online forms available on the consultation webpage.
- **1.6** For further information about the consultation or to submit comments via email please see our contact information.

2 Common themes - questions which came up in most events

2.1 Timescale of the Plan

Q1. What is the timescale of the Plan?

A1. A summary programme for the Local Plan Review can be found within the Local Development Scheme found here. This includes milestones such as publication of the Plan for pre-submission consultation (Regulation 19) towards end 2021, submission to Secretary of State following Cabinet and Council approval (Regulation 22) towards end 2022 and adoption by Council, mid 2023.

Q2. When does the consultation finish?

A2. The Consultation dates are Wednesday 13 January to Tuesday 9 March 2021.

Q3. Is there a timeframe whereby housing numbers could be re-allocated?

A3. Plan preparation is at an early stage. There will be several opportunities to reconsider, review and change the plan before it is adopted in 2023.

The <u>Emerging Spatial Strategy</u> document distributes scales of growth to each main settlement (Principal Settlements and Market Towns) using the upper end of forecast housing needs. This will be reviewed in response to consultation replies.

Q4. Why does the plan start in 2016, when we are in 2021?

The review uses a twenty-year period as per the Wiltshire Core Strategy and takes the start as the midpoint of this current plan (2016). The plan started its preparation in 2017 and the dates for evidence collated to support the Plan are based around this time period.

Q5. Why not plan in 5-year cycles so that we don't need to plan for huge numbers?

A5. The Local Plan Review uses a twenty-year period as per the Wiltshire Core Strategy and takes the start as the midpoint of this current plan. The Local Plan should be consistent with guidance contained in National Planning Policy Framework. This suggests that Local Plans should look at least fifteen years ahead from the date of adoption. See response to Q7 also.

Large and complex development schemes have long lead in times for development that very often take more than five years to progress.

Q6. Is the Chief Planner advice available online re the Local Plan Adoption by 2023?

A6. Letters from central Government to chief planning officers of local planning authorities, providing guidance on various aspects of the planning system, are available at: https://www.gov.uk/guidance/planning-guidance-letters-to-chief-planning-officers. The letter dated 1 October 2020 encourages local authorities to continue progressing local plans and not to pause due to uncertainty over the timing of the implementation of reforms proposed in the Planning for the Future white paper.

Q7. NPPF states that strategic policies should look ahead over a minimum 15-year period from adoption. Wiltshire Council's Local Development Scheme (LDS) says adoption of the emerging Plan is expected in 2023. Will the Council need to extend the Plan period to 2038 (this consultation plan period only runs 2036) to meet NPPF requirements, and will additional housing sites need to be identified to account for this extended plan period?

A7. 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.

Q8 Why will there only be one consultation draft before submission to the Secretary of State?

A8. An initial consultation on the proposed scope and content of the Plan was held in 2017. The current consultation is an additional stage to enable stakeholders to comment and help shape the content of important elements of the draft Plan. Following this, there will be a publication of the draft Plan for its pre-submission consultation (Regulation 19). This is currently planned to take place late 2021.

Q9. Will the Government's Planning White Paper affect this process?

A9. The Government has asked all local authorities to continue their work on Local Plans. See Q6 above. Many of the reforms signalled by Government in the White Paper will need primary and potentially secondary legislation that has not yet been tabled and will take time to materialise. As and when it does it is likely that the Local Plan Review will progress under transitional arrangements to ensure development plan coverage across Wiltshire is maintained.

Q10. Will details of the consultation be published in local newspapers?

A10. Yes, normal procedure is to publish an advert providing details about consultations in the Wiltshire Times, The Gazette and Herald and the Salisbury Journal at the beginning of a consultation. This procedure was undertaken.

Q11. Will there be HAPs (Habitat Action Plans), BAPs (Biodiversity Action Plans) and SPDs (Supplementary Planning Documents) supporting the Local Plan Review?

A11. There will be supporting measures where it is necessary to provide more detailed interpretation of policies and proposals in the plan. This will follow the approach used for the current Wiltshire Core Strategy where for example the Trowbridge Bat Mitigation Strategy supports Wiltshire Core Strategy Core Policy 29.

Q12. Will the monitoring of Local Plan targets be improved? The supporting documentation (e.g. addressing climate change and biodiversity) suggests this is a very weak area.

To be found sound, the Local Plan will need to be supported by a monitoring framework. Therefore, it is likely that indicators will be introduced to measure the effectiveness of policies, including assessing progress towards achieving net carbon neutrality in planned development schemes.

Q13. Are you taking into account our neighbouring authority plans that, for example, could see many houses built on Hants/Wilts border?

A13. Yes, a statutory process of preparing or reviewing a Local Plan requires the Council to engage and consult with neighbouring authorities on strategic cross boundary matters.

Q14. Does the current pandemic, which is having a huge effect on everyone's lives and which will be long lasting, invalidate all current plans?

A14 No. It is too soon to know what long term effects there will be from the pandemic. Current and emerging plans look at long term trends that we must continue to address such as household growth. As the plan is progressed, we will need to consider any new evidence about the implications of the pandemic for planning.

2.2 Scale of growth

Q1. How are the housing numbers calculated? Where can these be found?

A1. The method for the calculating housing numbers, alongside the figures for each Market Town and Principal Settlement can be found in the <u>Emerging Strategy document</u>. The method behind the Wiltshire figures is in the <u>Local Housing Needs Assessment 2019</u>.

Q2. Do housing numbers include the surrounding villages or only the town?

A2. The housing numbers outlined in the <u>Emerging Spatial Strategy</u> and detailed in the place specific <u>documents</u> are for specific Market Towns and Principal Settlements. Housing numbers for Villages and other rural settlements can be found in the <u>Empowering Rural</u> Communities paper.

Q3. How are housing needs calculated? How is need calculated for different groups that reflect the community e.g. disabled people under 55 and the elderly?

A3. The calculation of housing needs are set out in the <u>Swindon Borough Council & Wiltshire Council Local Housing Needs Assessment 2019.</u>

From this context, the size, type and tenure of housing needed for different groups in the community will be assessed and reflected in planning policies, including, but not limited to, those who require affordable housing and other groups.

Q4. By relying on household projection data, is there not a risk we will simply be planning for those groups that are already being planned for and continuing to marginalise groups that are not being provided for?

A4. Forecasts derive from household projections prepared by the Office for National Statistics and the standard method set out in national planning guidance. At this stage the forecast determines the scale of homes needed as a basis for a spatial strategy.

From this context, the size, type and tenure of housing needed for different groups in the community will be assessed and reflected in planning policies, including, but not limited to, those who require affordable housing and other groups.

Q5. How do demographic factors of the local populace such as age and average wages steer the number and type of housing and employment? Will there be adequate single storey or adaptable housing?

A5. Forecasts derive from household projection prepared by the Office for National Statistics and the standard method set out in national planning guidance. Further information on what adjustments were then made to align future jobs growth and resident workers, long term migration patterns and components of change by age group are contained in the <u>Local Housing Needs Assessment 2019</u>.

The Wiltshire Core Strategy supports provision of 'lifetime homes' that are adaptable to changing needs. The effectiveness of the current approach will be reviewed to see whether it can be improved.

Q6. Will there be criteria to prevent overcrowding in developments and associated issues such as narrow roads and lack of parking?

A6. The current Wiltshire Core Strategy includes Core Policy 57 to ensure a high quality of design from new development. The effectiveness of this policy will be reviewed, and this encompasses aspects such as traffic, parking and housing densities.

Q7. Can individual households contribute to housing numbers for example through dividing up a home to turn into smaller dwellings?

A7. Yes. Where planning permission is granted for one dwelling to be converted into two or more homes, the additional dwellings will be counted as contributing to meeting housing requirements.

Q8. Why are housing market areas still being used?

A8. Housing Market Areas are being used as a basis for the distribution of growth, so solely to ensure housing needs are met where they arise. For example, if most housing needs are in the south of Wiltshire, they would not be met by most new homes being provided in the north. A balance needs to be struck to ensure that the housing needs of the County are met in a sustainable manner.

Q9. Should the growth strategy provide more opportunity for local Small and Medium sized Enterprise (SME) builders?

A9. Yes. That is the intention. Work preparing the plan is exploring how a range of site sizes might suit SME builders. It is also investigating how large-scale urban extensions might also include parcels of land for them too.

Q10. What % of the housing will be social housing? Does the housing include supported living accommodation?

A10. Core Policy 43 requires 30% or 40% affordable housing on sites of 10+dwellings. An updated Core Policy 43 will be included in this Local Plan. New housing will include a range of housing types to meet housing need. The Empowering Rural Communities consultation paper is seeking views on the proportion of affordable housing for the rural area.

Q11. Has the Council responded to the Government proposals for housing numbers?

A11. Yes. The Government suggested a revised method for local authorities to calculate minimum requirements for additional new homes. The Council raised serious concerns to a method that would have led to a substantial increase.

The Government has since responded by not bringing in any amendments that alter the approach used in the Emerging Spatial Strategy and the <u>Local Housing Needs Assessment</u> 2019.

Q12. Has the Council ignored the Government's housing requirement figures?

A12. No. 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 build on this and suggest Wiltshire will need more homes to balance jobs with the working age population to avoid people travelling into the county for work. Further information on this higher figure and the adjustments made are set out in evidence published as part of the consultation (see Local

<u>Housing Needs Assessment 2019</u>). The consultation is based on the higher figure and shows how this could be distributed across Wiltshire.

Q13. Why are the Housing requirement figures 2 years out of date?

A13. The Council monitor housing completions and supply on an annual basis. For a very large Local Authority, such as Wiltshire, this process can take a significant amount of time. The nature of the COVID pandemic has limited the capacity to carry out this process, however the Council are now progressing an update to the requirement figures up to the current year.

Q14. Do the housing figures include a requirement for second homes?

A14. No

Q15. Alternative Development Strategy - Should the Council be looking at an area covering Melksham, Calne, Chippenham and areas in between?

A15. Individual alternative development strategies were developed for four Housing Market Areas. Melksham, Calne, Chippenham and areas in between are all included in one of these Housing Market areas, the Chippenham Housing Market Area, as explained in the Emerging Spatial Strategy document.

Q16. Why hasn't Wiltshire built a new settlement - e.g. at Hullavington airfield? Particularly on land that is not green belt or adjacent to other settlements.

A16. An alternative involving a new settlement was considered as part of one the alternative development strategies for the Salisbury Housing Market Area. Elsewhere, it was not considered that a new settlement was an appropriate alternative to consider because of the long lead in times they involved and because no locations were being promoted by landowners or developers.

Q17. Where are the appraisals for all the options considered including a Garden Village?

A17. An alternative involving a new settlement or Garden Village was considered as part of one the alternative development strategies for the Salisbury Housing Market Area. Elsewhere, it was not considered that a new settlement was an appropriate alternative to consider because of the long lead in times they involved and because no locations were being promoted by landowners or developers. The Emerging Spatial Strategy document identifies the alternative development strategies considered and supporting documents that have appraised these.

Q18. Why is Wiltshire Council building 5,000 more houses than required?

A18. 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 and we are testing whether this higher figure is appropriate.

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.

Q19. Are there indicative numbers that each site can take?

A19. An approximate number of dwellings has been estimated for preferred sites at Chippenham, Salisbury and Trowbridge. No indicative numbers are suggested for sites included in the pool of potential development sites suggested at Market Towns. Parts of these sites are likely to remain undeveloped. Further, more detailed assessment would be needed to produce sensible estimates.

Q20. How will the Council ensure the Plan is supported by a constantly updated and sufficient 5-year housing land supply? How will the annual review work and how will the original plan be protected?

To maintain a five-year housing land supply requires a continuous supply of deliverable sites. The Plan will aim to allocate a range of different sized sites that can come forward throughout the Plan period, to ensure a constant supply of housing land. The annual review of the housing land supply requires continuous monitoring of progress on sites across Wiltshire (both with permission and allocated in the development plan), how swiftly development is progressing on those sites, and the rate at which housing is being completed.

Q21. How do establishments such as care homes count towards housing numbers?

A21. Care Homes do not count towards housing numbers. However, the Council will need to ensure the plan policies make provision for needs for care home and specialist accommodation.

Q22. The Local Needs approach: Doesn't the standard method allow you to project household growth 15 years ahead? Or further?

A22. Yes, it does, and it is used to project further. The standard method is used to project housing need over the twenty-year plan period.

Q23. Is the number set by the 'algorithm' or the previous methodology? Is the number likely to change as the Plan is developed?

A23 The Government has completed amendments to the standard method following the outcome of its recent consultation on 'Changes to the current planning system', and this has not affected the figures being tested as a part of this consultation. Further on in the plan making process, revised household projections from the Office of National Statistics and affordability statistics may become available. Forecast housing needs may need to be reviewed.

Q24. The presentation of the numbers homes in the county appears on a rolling basis. do we have a clear view as to whether we are meeting our targets?

A24. We are meeting housing requirements. The Government measures local authority performance using a 'Housing Delivery Test'. The latest figures show us achieving 140% of requirements. The Council monitor housing completions on an annual basis to understand the rate at which sites are delivering housing, and therefore how well the plan is performing against its housing requirements. The Council may intervene where this monitoring activity indicates to further land needs to be released to meet its housing requirements, such as with the recently adopted Wiltshire Housing Site Allocations Plan.

Q25. What proportion of the 45,600 new homes will be truly affordable, given the relatively low average salaries for buyers? Most recent new developments look unaffordable for key workers

A25. Core Policy 43 requires 30% or 40% affordable housing on sites of 10+dwellings. An updated Core Policy 43 will be included in this Local Plan. New housing will include a range of housing types to meet housing need, including key workers.

Q26. Has the option to only provide affordable homes been considered?

A26. There are already mechanisms to provide sites solely for affordable homes at rural settlements. There is also provision to permit schemes solely for 'entry level housing' (essentially first-time buyers) at main settlements.

Work will consider how best to meet the full range of housing needs as work progresses to see what more might be done.

Q27. What is WC performance (percentage against target) in securing provision of affordable homes as part of the developments?

A27. For the period 2015-2019, 25% of new homes in Wiltshire have been delivered as affordable housing.

Q28. What room for manoeuvre does Wiltshire Council have to 'push back' on central government suggested targets if you feel these are no longer appropriate?

The Council raised concerns about recent Government proposals that would have substantially increased housing requirements in the County.

The Government has now completed amendments to the standard method following the outcome of its recent consultation on 'Changes to the current planning system', and this has not affected the figures being tested as a part of this consultation.

If Wiltshire is incapable of meeting its forecast housing need, then in line with national planning policy it may approach neighbouring authorities to help do so. Currently there is no evidence to suggest this is the case.

To assess local housing need by rejecting the national standard method, the Council would need to establish exceptional local circumstances justified by compelling evidence. At present evidence is insufficient.

Q29. The current Local Plan consultation is based on the old district level Housing Market Areas (HMAs). HMAs have been redefined by the 2019 NPPF as county wide. How is Wiltshire Council going to square the circle with national planning policy?

A29. The HMAs are defined by analysis commissioned by the Council (<u>Local Housing Needs Assessment 2019</u>) and boundaries do not follow the previous District Councils'. The HMAs are used solely as a basis to distribute growth to help support meet housing needs where they arise. The NPPF itself no longer makes reference to HMAs.

Q30. It is this HMA redefinition which has allowed developers to play the system & land bank. What steps are WC taking to address this & close this loophole?

A30. HMAs are no longer used as the means to assess housing land supply. The Government revised its approach to carry out assessments using statistics at an authority level. The Council has no discretion over this matter.

Q31. Chippenham's housing need was estimated as 3,000 but 7,500 are proposed. Why does Wiltshire want to draw in so many from elsewhere?

A31. Rolling forward the current strategy Chippenham would suggest a requirement of around 6,500 additional homes. The Emerging Spatial Strategy suggests around 9,200. A greater focus of growth on the town performed better than other alternatives.

The Council is using a forecast of housing need for the Chippenham Housing Market Area. It is not drawing in or meeting needs from other parts of Wiltshire or beyond.

Q32. Is there scope for altering the allocation between the four HMAs?

A32. The Council will review forecast housing need for each HMA if and when new evidence emerges.

Q33. What is sustainable growth and is quality of life considered within this? Can a number-dominated housing policy be sustainable?

A33. The Plan must meet economic and social needs, whilst protecting the environment. A strategy with an appropriate balance is sustainable development and meeting housing need is just one part of the equation.

Q34. Why has the Chippenham housing market area allocation increased from 14,000 to 20,000 new homes?

A34. Forecast housing needs have increased. The factors bringing this about are explained in the <u>Local Housing Needs Assessment 2019</u>.

2.3 Housing allocations

Q1. How are the sites selected?

Q2. What is the process for submitted sites and can sites still be put forward? Can other sites still be considered?

A1, A2. The 'Planning For...' and 'Site Selection' Reports for each Market Town and Principal Settlement explain the process being followed for site selection.

The Council has an ongoing Call for Sites through which sites can still be put forward for consideration.

Q3. How will the Council know which sites the local people and Town and Parish council prefer?

A3. The purpose of this consultation is to seek feedback and comments from local people and Town and Parish Councils on the work carried out so far. All comments will be considered, and changes made if appropriate.

Q4. To what extent have the sites been assessed in terms of sustainability? Can other factors which have become increasingly important such as biodiversity, wildlife corridors, provision of natural spaces to support mental health be included into the sifting process?

A4. Sustainability Appraisal is part of the process. An interim Sustainability Appraisal has informed the work carried out so far and is available as part of this consultation. The site selection reports for Principal Settlements explain how the interim Sustainability Appraisal has informed the site selection process. Biodiversity and landscape criteria are included. Sustainability appraisal has been used to consider scales of growth at all settlements and will be part of the selection process going forward from the pool of potential development sites shown at Market Towns

Q5. How will brownfield sites be identified?

A5. In accordance with Core Policy 2 of the Wiltshire Core Strategy brownfield sites within the defined Limits of Development ('the Settlement Boundary') could be permitted without the need to be allocated in the Local Plan. But we anticipate that the preparation of new, or the review of existing neighbourhood plans will also address planned regeneration of existing brownfield land. Many sites, however, are 'windfall' sites which by their nature are impossible to identify at the plan making stage and will nevertheless contribute to meeting brownfield targets at main settlements.

Q6. Missing out brownfield sites in strategic assessment surely means higher numbers to be placed on greenfield sites? What about density and mixed use of large sites?

A6. Where brownfield sites have planning permission or there are deliverable sites allocated in the Wiltshire Core Strategy or a made neighbourhood plan, these have been deducted from what we need to plan for. This results in lower numbers to be accommodated on greenfield sites.

The density and mix of uses on large developments are determined on a site by site basis guided by local need, the location and environmental attributes of each one.

Q7. Should the brownfield sites be used before the greenfield sites? Why is the focus not on better management of green spaces and housing improvements on existing buildings?

A7. The focus of the consultation is on tackling the difficult and controversial decisions around urban expansion ('greenfield development') at an early stage in the plan's preparation. A focus of the plan once drafted will be to ensure development within the existing urban area safeguards local green spaces and delivers high quality design.

Q8. Does this allow for development of brownfield sites or is this all new greenfield development?

A5, A6, A7, A8. 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 including how the amount of greenfield land to be identified for development will depend on the brownfield land identified that can be relied upon. Views are sought on this approach.

Q9. Is there a more detailed report on the assessment of sites to support the judgements set out in the site selection report? Will these assessments be revisited?

A9. The <u>Interim Sustainability Appraisal</u> has informed the site selection process for Principal Settlements and is available as part of this consultation. Further work to review and update the site selection work will take place following this consultation.

Q10. How have place-shaping priorities been identified? How can a holistic approach to place-shaping which covers more than numbers of dwellings be taken?

A10. Draft place shaping priorities have been identified following initial discussions with representatives of Town and Parish Councils, a review of Wiltshire Core Strategy place based polices and information from earlier consultations. They guide how and where development will take place and what distinct priorities there are to manage change in the local environment.

Q11. Why are so many homes built in areas where a large proportion of the populace commute out?

A11. A sustainable pattern of development that promotes self-containment and reduces the need to travel is a central part of the Local Plan.

Q12. Are any sites being allocated for self-build? Has Wiltshire Council included data/demand from their self-build register as part of the Local Plan?

Q13. Is there a way to introduce self-build and custom-build requirements?

A12, A13. The concept plans for the proposed sites at the Principal Settlement include land for self-build and custom build development and views are sought on this. A similar approach will be taken for sites elsewhere. A self-build and custom build policy is also being considered. The self-build register is one of the sources of evidence.

Q14. Please can you incentivise developers to build houses without garages as these take up extra space and are used for storage?

A14. Suggestions are welcomed as part of this consultation.

Q15. Is the Local Plan Review considering lower density developments in light of the current pandemic?

A15 The COVID-19 pandemic has underlined the importance of local green spaces to our quality of life. The Council is developing a green and blue infrastructure strategy with the three goals of: adaptation and resilience to climate change; halting the loss of and improving biodiversity; and contributing to health and well-being. This will help to improve urban

design and place shaping to properly value and enhance natural and man-made spaces. This may result in 'lower density development' and is more effective and useful than simply prescribing lower densities per se.

Q16. Is it time to rethink allocations and move away from housing and employment allocations considering COVID-19 inspired trends such as increased home working, town centre retail decline and the need for more spacious housing?

A16. The <u>Emerging Spatial Strategy</u> document discusses the impacts of COVID-19 on delivering the spatial strategy, including renewing the focus on how well our urban areas function and how increased homeworking may create opportunities to reconsider how we use town centres.

Q17. Where can an up to date SHELAA be found?

A17. Information can be found on our website at Monitoring and Evidence - Wiltshire Council

Q18. How will the Local Plan Review assist young people in villages to get on the housing ladder?

A18. The Local Plan will identify the number of houses to be provided. Neighbourhood Plans are often the most effective means to allocate sites to meet local housing needs in our rural settlements, including those of younger households. A range of housing types can be required to be provided, including affordable housing.

Q19. Is public health considered in planning decisions, for example ensuring the protection of open greenspaces?

A19. The National Planning Policy Framework definition of Achieving Sustainable Development includes supporting strong, vibrant and health communities, through for example accessible open space that reflects current and future needs and supports community's health, social and cultural wellbeing.

The National Planning Policy Framework contains specific guidance to protect open green space in certain circumstances.

Q20. Will there be sufficient provision for smaller/bungalow style properties to be built to accommodate those wishing to downsize?

A20 The existing Core Policy 45 requires new housing to incorporate a range of housing types, tenures and sizes, based on needs of the community. This will continue in the Local Plan. Its effectiveness is being reviewed as part of preparing the Local Plan.

Q21. Why have the sites marked in red been excluded?

A21. The Site Selection reports for Market Towns and Principal Settlements explain the reasons for excluding or including sites.

Q22. If a site gets planning approval, what is the ballpark estimate for building to commence?

A22. Delivery timescales are determined on a site-by-site basis, following discussions with the landowner or developer involved. Delivery timescales can vary e.g. some sites are more complex than others and there will be a longer lead into time to when housing is delivered.

Q23. Please can public rights of way be taken into account at the beginning of the planning process?

Q24. The 'Planning for...' documents only address housing, what about plans for other land uses or example natural flood management, forestry, recreation, food production and sports?

A23, A24. Settlement Profiles have been prepared which summarise the measures in place or being put in place to address known infrastructure issues and their timing, what additional provision would be needed to support growth and what other opportunities there may be will be used to help shape the proposals. Concept plans for preferred sites at Chippenham, Salisbury and Trowbridge address land uses other than new homes. The pool of potential development sites at each Market Town are similarly those potentially suitable for development for a range of possible new uses. A Green and Blue Infrastructure Strategy is being developed. This includes green and blue infrastructure uses (e.g. rights of way) and sport and leisure requirements.

2.4 Neighbourhood Planning

Q1. How will a neighbourhood plan review and local plan review work together and not conflict each other?

Q2. What if the issues in the neighbourhood plan are different to those in the Local Plan?

A1, A2. The Local Plan will set the strategic context for Neighbourhood Plans and addresses strategic issues Neighbourhood Plans will be in general conformity with the higher-level plan and focus on non-strategic issues.

A neighbourhood plan can be developed before or at the same time as the local planning authority is producing its Local Plan. A draft plan must be in general conformity with the strategic policies of the development plan in force if it is to meet the basic conditions. Although a draft neighbourhood plan is not tested against the policies in an emerging local plan the reasoning and evidence informing the local plan process is likely to be relevant to the consideration of the basic conditions against which a neighbourhood plan is tested.

Where a neighbourhood plan is bought forward before an up to date local plan is in place the qualifying body and the local planning authority should discuss and aim to agree the relationship between policies in:

- the emerging neighbourhood plan
- the emerging local plan
- the adopted development plan

with appropriate regard to national policy and guidance.

The local planning authority will work with the qualifying body so that complementary neighbourhood and local plan policies are produced. It is important to minimise any conflicts

between policies in the neighbourhood plan and those in the emerging plan, including house supply policies.

A neighbourhood plan can allocate additional sites to those in a local plan where this is supported by evidence to demonstrate need above that identified in the local plan. Neighbourhood plans should not re-allocated sites that are already allocated through strategic plans.

Should there be conflict between a policy in a neighbourhood plan and a policy in a local plan the conflict must be resolved in favour of the policy which is contained in the last document to become part of the development plan.

Q3. How will the Council incentivise local engagement in the review of neighbourhood plans?

A3. Neighbourhood plans can only be prepared by a 'qualifying body'. In areas such as Wiltshire where a parish or town council exists, these are the nominated qualifying body. There is a need to consider how to engage with the wider community and Wiltshire Council therefore advocates a steering group approach led by the qualifying body. Members of steering group should include the Parish or Town Council(s), other local stakeholders as well as members of the community.

The Council provides officer support to each Neighbourhood Plan group and Government grants are available to fund support and carry out plan making by independent planning consultants

Q4. If a landowner has responded to a call for sites for Housing from both the Local Plan and the Neighbourhood Plan but the plot doesn't sit in both areas, how does the Landowner proceed with their offer within one plan when it doesn't fit within the other?

A4. The <u>Emerging Spatial Strategy</u> report includes draft delivery principles to deliver the spatial strategy. Generally, the Council will allocate land for development through the local plan where there are large or complex sites, it is necessary to maintain a supply of sites for new homes or where land for greenfield development crosses the boundaries of neighbourhood plans or into rural parishes that adjoin an urban area. Otherwise, housing sites can be allocated by neighbourhood plans.

Q5. Is a neighbourhood plan really the right vehicle for delivering housing for large and small villages in large, geographically dispersed rural areas?

A5. The draft policy 'Housing Requirements for Neighbourhood Plan designations in the Rural Areas' on page 10 of the Empowering Rural Communities Paper explains the Council's proposed approach for Large Villages. Small Villages, where development is more limited, are also covered in the document. This also explains that the Council may review the Wiltshire Housing Site Allocations Plan if necessary.

Q6. What is Wiltshire Council doing to support the Neighbourhood Planning process in light of the shortfall in 5-year land supply?

A6. Neighbourhood Plans form part of the development plan. The Council continues to support the preparation of neighbourhood plans and is encouraging emerging Neighbourhood Plans to be in line with the Local Plan and for made Neighbourhood Plans to be reviewed and updated.

Q7. Will the Neighbourhood Plan have a role in terms of master planning and design principles/coding for any sites allocated for strategic development by the Local Plan?

A7. Yes, it may. The Local Plan Review sets the strategic context for neighbourhood planning. It is appropriate that a community's design expectations inform a strategic development and a neighbourhood plan may articulate them. This will require closer working between the Council and Parish and Town Councils to support the preparation of each authority's plans.

Q8. How can local communities get involved in influencing the design/layout/content of the proposed sites, particularly community facilities and recreation spaces?

A8. The purpose of this consultation is to seek comments and feedback on the concept plans for proposed sites at the Principal Settlements and the sites being considered at Market Towns. Following this consultation, all comments will be considered, and changes made if appropriate.

Q9. What is the status of land around Trowbridge that is within a village parish boundary but outside that village's settlement/policy area? What is the status of Neighbourhood Plans in influencing the Local Plan?

A9. Plan preparation takes no account of civil administrative boundaries. It treats towns and villages by the extent of their built-up area. Land outside the settlement boundary of Trowbridge and Large Villages is treated as countryside where there is a presumption against residential development unless on sites identified in the Local Plan or a neighbourhood plan. The consultation is suggesting new preferred sites for development at Trowbridge, as well as housing requirements for villages in the Empowering Rural Communities document and views are sought on these. Made neighbourhood plans have been referenced in considering sites at Trowbridge.

The preparation of the Local Plan has regard to current plans but must look further forward. It will provide a longer-term framework to which all neighbourhood plans must generally conform.

2.5 Infrastructure (including community facilities) and developer contributions

Q1. How will you engage with services such as health/education to assess the need for new services?

Q2. How does the Council ensure there is adequate services?

A1/ A2. 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 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 (the 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.

Q3. How does the plan respond flexibly to respond to development opportunities that may support major infrastructure improvements, for example, proposing enough growth to warrant a bypass?

A3. Core Policy 66, Strategic Transport Network, enables the Local Plan (Core Strategy) to respond flexibly to any such development opportunities, stating that "In particular, the strategic transport network along the A350 corridor will be maintained, managed and selectively improved to support development growth at Chippenham, Melksham, Trowbridge, Westbury and Warminster." The Local Plan Review is another potential mechanism for this. For example, in Westbury, one of the place shaping priorities is that "Development should . . . address traffic issues in the town including consideration of, where appropriate, the route of the A350 through the town, including options for a bypass . . ."

Q4. Considering the current climate and the increased online shopping alongside many working from home and home school, what considerations have been made to improve the already overloaded problematic communications networks?

A4. In the National Infrastructure Strategy (November 2020) the Government stated that it now aims with industry partners to deliver a "minimum of 85%" of gigabit-capable coverage by 2025. Gigabit-capable broadband means any technology that can deliver speeds of 1 gigabit per second (1 gigabit per second is equal to 1000 megabits per second or Mbps). Currently, over 95% of UK premises have access to superfast broadband (download speeds of at least 30 Mbps).

However, industry will only provide broadband to areas where it is commercially viable to do so. Therefore, the Wiltshire Online programme is designed to provide a fibre broadband service to those premises that commercial providers consider to be financially non-viable. Without Wiltshire Council's considerable investment, approximately 40% of Wiltshire would not today have access to fibre broadband. The council's approach is designed to deliver fibre broadband to the greatest number of premises, given the finite budget available. Further information can be found on the Wiltshire Online website.

Q5. Why are there no community space outlined in the Plan?

A5. The Local Plan Review sets the strategic context for development in Wiltshire and, therefore, focuses on growth at the main settlements. Identifying community spaces might be something that the neighbourhood planning process is best suited in terms of achieving a desirable outcome.

Q6. How will the Council ensure that the benefits and the s106 obligations that developers sign up to are fulfilled?

Q7. Will Wiltshire Council hold developers to their requirement to fund local facilities as part of gaining planning permission?

A6, A7. A section 106 agreement is a legal agreement signed between the developer and the Council and contains planning obligations that must be directly related to the development. These planning obligations typically have trigger points, such as occupancy, that determine when facilities or contributions must be provided. Further information is available from the Council's website in the Revised Planning Obligations Supplementary Planning Document.

Q8. How will Community Infrastructure Levy (CIL) receipts be spent? Will they be used in the same town?

A8. Wiltshire Council pools Community Infrastructure Levy (CIL) receipts from development across the county into a single pot. The annual Infrastructure Funding Statement contains a list of infrastructure projects that the Council may fund, in whole or in part, through CIL. Unlike with Section 106 planning obligations, there is no requirement for CIL to be spent in the same area as the development that generated the CIL receipt. The purpose of CIL is to help fund the strategic infrastructure that supports planned growth across Wiltshire.

A proportion of CIL is passed to town and parish councils in whose area the development takes place. This is 15%, or 25% if there is a made neighbourhood plan in place. Town and parish councils must use their proportion of CIL on something, not necessarily infrastructure, that supports development in their area.

2.6 Climate change, the environment and biodiversity loss

- Q1. Why are factors associated with climate change not included in the key selection criteria when sites are initially selected?
- A1. Climate change factors are considered at 'Stage 3: Sustainably appraisal of sites' of the site selection methodology. However, flood risk is also considered at an earlier stage of assessment.
- Q2. Will new homes be designed to be carbon zero? What policy measures will be put in place?
- Q3. How will policies in the local plan align with local and national climate change targets? Will policies be limited by national policy?
- Q4. How do these proposals align with the Council's net zero carbon by 2030 target?
- Q5. Please can the plan include a commitment to greener housing standards? The Government is a long way behind where it should be.
- Q6. Can planning conditions be introduced to ensure fabric efficiency of homes and buildings?

A2-6. National Policy currently does not require new homes to be carbon zero. However, Wiltshire Council declared a climate emergency in February 2019 and is seeking to make the county of Wiltshire Carbon zero by 2030. Although land use planning can only go so far to support this aim, it is important to recognise what it can do. This is outlined in the Addressing Climate Change and Biodiversity Net Gain document, which outlines how climate change 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. Views are invited.

Q7. Why are some sites able to be put forward in sensitive areas such as Conservation Areas?

A7. The Local Plan Review will seek to ensure that site allocations avoid harming the significance of both designated and non-designated heritage assets, including effects on their setting. At the same time, the allocation of sites for development may present opportunities for the historic environment. For example, new development may better reveal the significance of heritage assets (paragraph 137, NPPF) or may provide an opportunity to tackle heritage at risk through the sensitive development of specific sites.

Q8. Will the Plan be used to identify suitable sites for renewable energy generation?

A8. Sustainable energy generation and management is one of the key themes of focus in the <u>Addressing Climate Change and Biodiversity Net Gain</u> document, which is the starting point for addressing climate change policies in the Local Plan. Views are invited on this.

Q9. How has flood risk been assessed? Have downstream impacts been considered? Can a more strategic approach be taken e.g. taking a catchment approach? Why are natural flood management techniques not considered and carried through to the maps of each area?

A9. Flood risk has influenced the scales of growth proposed at settlements and the sifting of sites. This has involved consideration of all sources of flood risk including flood risks beyond the site itself. Such evidence is informed by a catchment approach.

As plan preparation progresses, more detailed work will consider the role and opportunities of individual sites in a catchment approach and explore natural flood management techniques.

Q10. What are the total carbon emissions associated with the Local Plan proposals?

A10. As it is currently unknown how each site will be bought forward, the total carbon emissions for each development and associated infrastructure is unknown.

However, as outlined in the <u>Addressing Climate Change and Biodiversity Net Gain</u> document, we are considering how the Local Plan policies can be development to address carbon emissions.

Q11. Developers are very accomplished at apparently ticking all the boxes regarding issues such as thermal efficiency etc. What powers do the council have to enforce building regulations and how powerfully will those be enforced?

A11. The Council has a general duty to enforce the building regulations in its area and will aim to do so by informal means wherever possible. Should informal enforcement not achieve

compliance with the regulations then the Council has two formal enforcement powers that it may use in appropriate cases. First, the Council may prosecute a person carrying out building work that contravenes the Building Regulations in the Magistrate's Court, where unlimited fines may be imposed (sections 35 and 35A of the Building Act 1984). Action is usually taken against the person carrying out the work and prosecution is possible up to two years after the completion of the offending work. Second, the Council may serve an enforcement notice on the building owner, instead of or in addition to prosecution, which requires alteration or removal of work that contravenes the regulations (section 36 of the 1984 Act). If the building owner does not comply with the enforcement notice, the Council can undertake the work itself and recover the costs from the owner.

- Q12. Given the pressing need to address climate why is the plan not more insistent on high levels of house building good thermal efficiency, installed Solar PV or access to community heating schemes; grey water collection and electric charging points for each house?
- Q13. Will the Local Plan Review support innovative building designs and layout? For example, low energy usage and highly insulated with integrated community facilities.
- A12-13. Sustainable design and construction is one of the key themes of focus in the <u>Addressing Climate Change and Biodiversity Net Gain</u> document, which we are consulting on to help develop policies in the Plan for addressing climate change. Views are sought on this.

Q14. How will the Local Plan Review protect and improve access to local green spaces within and on the edges of settlements?

A14. In preparing the Local Plan, policies may identify such spaces and therefore they are given the appropriate level of protection in planning controls. Local Green Spaces may also, and often more appropriately, be identified in Neighbourhood Plans, when they can be afforded considerable protection.

Schemes adjoining such areas can include walking and cycling routes expressly as a part of their design, required by site specific proposals in the Local Plan. Often developer contributions, gathered from developers, is used to improve existing routes to green spaces.

Q15. When will the local community be able to plant trees on local green spaces?

A15. This is a matter for those who manage each individual space and will vary from one community to another.

Q16. Can the greenbelt be enlarged, or green spaces be added through the process?

A16 The general extent of green belt across the country has already been established and boundaries have been delineated. We must have regard to their intended permanence and boundaries should only be altered where exceptional circumstances are fully evidenced and justified. Exceptional circumstances are not present.

Green spaces are an important part of new development and will be added as a part of proposals contained in the Plan.

Q17. How will the Local Plan Review consider energy infrastructure, such as biodigesters for combined heat and power, to support development?

A17. Sustainable energy generation and management is one of the key themes of focus in the <u>Addressing Climate Change and Biodiversity Net Gain</u> document, which we are consulting on to help develop policies in the Plan for addressing climate change. Views are sought on this.

Q18. How will the Local Plan Review ensure biodiversity net gain when development will reduce wildlife corridors? Will this be required on every housing site to conform with Core Policy 50? Will the Defra biodiversity metric be used to provide evidence of the impact on habitat and protected species?

A18. Concept plans for preferred sites at Chippenham, Salisbury and Trowbridge have been formulated to show the number of new homes and other uses that can be delivered alongside biodiversity net gain. The process for each site has relied on the DEFRA biodiversity metric.

It may be that net gain will be required by new law, if not the Council will consider the possibility of amending Wiltshire Core Strategy Core Policy 50 to give it this capacity.

Q19. Will the biodiversity and blue/green infrastructure maps be available in higher resolution?

A19. They will be published as a part of the forthcoming Green and Blue Infrastructure Strategy. In the meantime, if needed, they are available on request.

Q20. When will the Habitats Regulations Assessment about the River Avon Special Area of Conservation (SAC) be published and how will the nitrates/ phosphate issue affect housing delivery in, for example, Warminster and Salisbury?

A20. The Local Plan Review is subject to a Habitats Regulation Assessment. It informs the plan content. Further information on this, the River Avon SAC and other such designations can be found in the Wiltshire Local Plan Review Habitats Regulations Assessment Scoping Report

Q21. Why is biodiversity not considered more thoroughly and how can sites plans be properly considered without this evidence?

A21. Biodiversity is considered at 'Stage 3: Sustainably appraisal of sites' of the site assessment methodology. It has also been considered at the very outset as a factor helping to determine scales of growth at individual settlements.

Q22. Can you ensure habitats and wildlife within sites are protected?

A22. Designated ecological sites are each afforded the level of protection appropriate under existing Wiltshire Core Strategy Core Policy 50. It is intended that all new development will be required to provide bio-diversity net gain. This is considered in the document Addressing Climate Change and Biodiversity Net Gain

Q23. Additional population levels will inevitably increase footfall of current local green spaces, will there be any financial help towards the upkeep of these sites for those landowners?

A23. In principle, this would be an appropriate use of Community Infrastructure Levy, but financial support would need to be justified and agreed on a case by case basis.

2.7 Transport and sustainable and active travel

Q1. What plans are in place to ensure links to town centres are sustainable and can be easily accessed safely by foot or bicycle?

A1. Preliminary consideration of walking and cycling schemes for the Principal Settlements are included in the Atkins Transport Report. These schemes will be further evolved through potential scenario testing; see below.

Q2. How has the effect of increased traffic associated with future development been modelled?

A2. Traffic impact has been assessed using the Wiltshire Strategic Transport Model, which utilises SATURN programming. The protocols for development traffic consideration, in terms of trip generation etc., are included in the Atkins Transport report.

Q3. Will public transport be given priority over private cars?

A3. The Council's Local Transport Plan (LTP) sets out its priorities, LTP4 will be updated alongside the Local Plan. The intention of the Local Plan is to reduce the need to travel, and by the private car in particular, whilst supporting measures that support alternatives, including public transport.

Q4. Will the likely long-term changes to working and travel patterns as a result of COVID be considered?

A4. Yes. But it is too early, at present, to draw conclusions about the long term. We will work with the Council's consultants testing the Local Plan probably using a range of possible scenarios of shifting travel patterns.

Q5. With the change to EV/hydrogen private vehicles likely to take place during the plan period (before 2036), should the Council be considering a more decentralised distribution of growth?

A5. This is a particularly difficult question to answer. Wiltshire Council will be considering scenario testing to establish new future baselines of trip making and modal share etc., and this will include uptake of EV. However, if the question relates to decentralisation of growth as a result of EV take-up, this will correlate with EV/Hydrogen infrastructure delivery and where this is viable; decentralisation of growth is unlikely to be a direct result of EV take up.

Q6. When will the revised Local Transport Plan be available for consideration in regard to the future of public transport and alternative travel to the car?

A6. We are currently waiting on the Department for Transport to publish its delayed Transport Decarbonisation Plan (TDP) as it is anticipated that this will largely set the context for Local Transport Plans (LTPs). The TDP is now scheduled to be published in the Spring. Following this, we will develop and consult with key stakeholders on an Issues and Options Paper in the Autumn prior to holding a public consultation on the LTP4 Strategy, associated strategies and supporting documents in 2022.

Q7 Shouldn't a sustainable transport strategy be guiding the local plan, not following it?

A7. The two are developed alongside one another. At this stage of preparing the Plan, the emerging spatial strategy and the site selection process take account of location and accessibility with a view to reducing the need to travel and, in particular, the need to travel by private car. Transport strategies for towns will be refreshed to mitigate the effects of growth and encourage modal shift.

Q8. How will the transport proposals be future proofed to contribute to a net zero carbon economy?

A8. As per above, scenario testing will be undertaken to determine what measures need to be in place to support the zero-carbon economy and other relevant milestones. This is ongoing work but will assist in the preparation of the draft Plan.

Q9. Will the £300m planned for road improvements over the plan period help Wiltshire meet the target of a reduction in car kilometres of 6% by 2030 and 17% by 2050 (6th Carbon Budget, December 2020)?

A9. The principle aim of the highway schemes in the current work, is to improve the efficiency of the A350 corridor, thereby reducing long distance journey times and improving vehicle efficiencies. Such schemes as the Chippenham Eastern Link Road and Melksham Bypass will also remove strategic transport movements from within town settlements and allow internal roads to be repatriated for active and more sustainable modes of transport and advance local containment of trips and modal shift through improved active travel environments.

Q10. Are car parks an unused space in the plan?

A10. No. Car parks continue to be important to both visitors and residents.

Q11. Do the current assumptions regarding transport and its environmental impact take into account that soon the majority of vehicles will be electric?

A11. The current assumptions present a forecast status quo, wherein current car usage is projected into the future, with appropriate mitigation to maximise non car mode take up. The consideration of fuel type for vehicle stock has not been made at this time but will part of the next round of assessment.

Q12. Will any new housing development make adequate provision for the parking of at least two vehicles per property with provision to charge them?

A12. Requirements for charging are likely to be introduced progressively under building regulations. Detailed measures can be considered at the planning application stages of development. Through the plan making process we will continue to liaise with energy providers to ensure adequate capacity in the local grid for likely increases in electricity consumption to facilitate charging point provision.

Parking standards will be considered through the review of the Local Transport Plan.

2.8 Enforcement of the plan

Q1. How will the Council ensure developers do not take advantage of the current 5year housing land supply position whilst waiting for the new plan?

A1. When the Council is unable to demonstrate a five-year housing land supply, careful consideration should still be given to decisions on housing proposals. This means balancing the need to improve housing supply against any adverse impacts of the proposal, considered against the development plan as a whole, and any material considerations, on a case-by-case basis. This will need to include consideration of what weight to assign to the most important policies.

Q2. How will the policies in the plan be enforced?

Q3. Is it possible to set condition for new developments?

A2, A3. Through the planning application process, developments may have planning conditions (under the Town and Country Planning Act 1990) imposed on them, requiring actions needed in order to make a development acceptable in planning terms. These usually relate to things like the actual physical development and is construction on-site. For example, planning conditions are likely to cover the requirement to:

- Undertake archaeological investigations prior to commencement
- Remediate contaminated land
- Implement necessary local site-related transport improvements
- Undertake appropriate flood risk solutions
- Submit details of materials to be used in the development, and
- Control opening hours of environmentally unfriendly but necessary uses.

Another mechanism used to enforce policies in the Local Plan is a planning obligation. These may be required by the Council to, for example:

- Control the impact of development, for instance, a proportion of the housing must be affordable
- Compensate for the loss or damage caused by the development, such as the loss of a footpath
- Mitigate a development's impact, such as increasing public transport provision.

Unlike with planning conditions, a planning obligation can also be used to request a financial contribution towards, for example, education or health facilities. The Council can secure planning obligations through a legal agreement (under section 106 of the Town and Country Planning Act 1990) with an applicant.

Q4. How will the Plan ensure social value and sustainability in any planning approval?

A4. The <u>Public Services (Social Value) Act 2012</u> defines 'social value' as, in part, the 'economic, social and environmental wellbeing' that is created by a service (or development) and delivered directly or indirectly over a period of time. The Local Plan Review will accomplish this by assessing the future levels of need for new homes (including market, affordable and specialist housing) and employment land over the period 2016-2036 and to

provide an appropriate basis for housing, employment land and infrastructure provision over that period. It will identify the necessary infrastructure, such as education, health and leisure facilities, sustainable transport and environmental protections, that will need to be delivered by development over the plan period. This consultation also provides an opportunity to inform proposals about how the Council's planning policies can be shaped to address climate change and biodiversity net gain and to improve the framework for rural communities to meet housing needs.

The Planning and Compulsory Purchase Act 2004 requires a local planning authority to carry out a sustainability appraisal during the preparation of a Local Plan. Its role is to promote sustainable development by assessing the extent to which the emerging plan, when judged against reasonable alternatives, will help achieve relevant environmental, economic and social objectives. Further information can be found in the Interim Sustainability Appraisal, which can be downloaded from the Council's website.

- Q5. What powers does the Council have to force developers to build out planning permissions within a specified time? How can you be sure that houses promised are houses built?
- Q6. Does the Council scrutinise developers to ensure they deliver, particularly when one developer owns many sites?

A5/A6. By law, any planning permission granted expires after a certain period. Generally, an applicant has three years from the date the planning permission is granted to begin the development. If work has not started by then, they will likely need to reapply. New builds (and extensions or structural changes for that matter) require building regulations approval to ensure that the proposals will be built in full compliance with the planning permission.

Wiltshire Council monitors housing completions annually. Further details on housing completions over the Wiltshire Core Strategy period can be found in the annual <u>Housing Land Supply Statement (HLSS)</u>.

2.9 Employment land

- Q1. How will the plan deliver the employment land, particularly as the ways in which people are working have changed?
- Q2. Post-Covid, which will potentially see a permanent move to home working, is the weighting of the jobs-homes criterion to assess an appropriate level of growth still relevant?
- Q3. Has the post COVID-19 world working patterns been modelled?
- Q4. How will the Council consider the likely rise in unemployment in many sectors and the predicted years of low economic growth post-Covid?
- Q5. Forecasts are that flexible working and working from home is likely to continue post the pandemic. Will the plan take account of the need for good broadband etc

and a possible different need for transport as fewer people commute (or at least commute less e.g. working from home two or three days a week plus)?

Q6. If changing working habits lead to lower office occupation, what incentive can you offer developers to convert offices to residential use, therefore saving greenfield areas?

A1-6. The Local Plan Review <u>Emerging Spatial Strategy</u> document recognises that COVID-19 is having and is likely to continue to have substantial economic impacts.

In terms of how we plan for delivering employment land, perhaps the impact of the pandemic is mostly keenly felt in Wiltshire's town centres. 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 on employment 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 <u>Wiltshire Retail and Town Centres Study</u> (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.

Q7. Does the allocated employment land refer to a particular type of employment e.g. manufacturing, office space? How will business be attracted to the area?

A7. At this stage of the Local Plan Review, the proposals only refer to an amount of employment land to be provided across a settlement. Further details on location within that settlement and potential uses will be developed further as the plan progresses. We would welcome your comments during this consultation on what this might be. Wiltshire Council will continue to work with local and national employers and other organisations to encourage and support businesses to set up or relocate to Wiltshire.

Q8. How will the plan ensure the type of employment matches the affordability of homes?

A8. The Local Plan Review, through the <u>Local Housing Needs Assessment 2019</u>, considers settlements where there is a particular need for affordable homes and employment sites or premises in developing its emerging spatial strategy for the distribution of housing and employment development and delivery.

Q9. How is the need for employment land calculated and what evidence is there to justify employment allocations?

A9. The evidence base to support the Local Plan Review proposals for additional employment land includes the <u>Swindon and Wiltshire Functional Economic Market Assessment (2017)</u> and the <u>Wiltshire Employment Land Review (2018)</u>. These evidence base studies inform the preparation of alternative development strategies for the amount and distribution of employment land across Wiltshire, which have then been subject to a sustainability appraisal.

Q10. What can be done to prevent land earmarked for employment being allocated to housing through appeals?

A10. The Local Plan Review must plan for between 40,840 and 45,630 new homes over the plan period of 2016 to 2036. By planning for sufficient new homes and adopting robust policies for housing delivery, the Council can ensure it maintains a robust five-year housing land supply and defend against speculative housing applications. Identifying the right amount and type of employment land in the right location will help to ensure that it is necessary and deliverable over the plan period.

Q11. How will start-up and R&D businesses be supported and promoted if no employment land is proposed in the outline proposal?

A11. Where no additional employment land is proposed this is because the evidence the current supply of land and premises is sufficient. However, this does not prevent proposals for new employment, including start up business, taking place on greenfield land on the edge of towns. This is permitted under current policy (Core Policy 34, Wiltshire Core Strategy).

2.10 Retail and the high street

Q1. How will the Plan respond to the long-term impacts on the High Street, following the impacts of Covid and Brexit?

A1. 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.

Q2 How will the Plan ensure town centres are fit for the future and able to attract people?

A2. The Local Plan will contain strategic policies to aid decision making of applications associated with the defined town centres or Main Town Centre uses, as defined by the National Planning Policy Framework 2019. Each place-based strategy may include text relating to retail and/or the town centre specifically. Currently, we rely on saved policies to protect the vitality and retail units of our defined town centres. The Local Plan Review will introduce be a consistent policy approach to protecting active uses for retail and leisure floorspace (and other uses falling into the new Class E Commercial, Business and Service use class) in town centres, as recommended by the Wiltshire Retail and Town Centre Study 2020.

Q3. Is there an updated assessment of office space and retail space since Covid?

A3. While the Wiltshire Retail and Town Centres Study was only recently finished and published, it recognises that the base data was almost entirely gathered prior to the COVID-19 pandemic taking effect on society, although the floor space forecasts in this study use data that has been adjusted to begin to take account of the economic impact of the pandemic. The Study itself recommends a focused review prior to submission of the Local Plan to the Planning Inspectorate. Nonetheless, the Study outlines that some of the immediate trends that we have experienced, such as a higher demand for online shopping, are things we expected to happen over a longer period of time.

Office space now falls into the same use class as retail, along with other commercial, business and service use. The Council will need to have full account of what this may mean for implementing planning policies and in hand what changes to demand may have occurred due to COVID-19. However, it is unlikely to be definitely clear how longer-term demands will change in the short term.

Q4. How will the effect of the present government consultation on Permitted Development Rights and its outcome for conversion of office/retail space to residential be taken into account?

A4. It is anticipated that the government will update The Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended) outlined prior to July 2021, when certain existing rights will no longer be relevant when taking account of the changes to The Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020 which came into effect 1 September 2020. Currently the proposals to convert Class E Commercial, Business and Service uses to Class C3 Residential uses through prior approval are only in proposed form, as outlined in the Government's 'Supporting housing delivery and public service infrastructure', which closed on the 28 January 2021. The Council will need to have regard to the future changes to permitted development rights in the development of retail and town centre policies in the Local Plan Review, but at this current time it is unclear exactly what these changes will be and how they will be applied.

Q5. Will there be plans to re-use vacant retail space instead of building on greenfield land?

A5. The <u>Wiltshire Retail and Town Centres Study 2020</u> considers that needs for retail and food/beverage floorspace across the county will largely be met through a churn of existing units. As such, it is vitally important to try and retain active uses where possible in the next plan period to ensure the vitality and vibrancy of town centres across Wiltshire. Nonetheless,

a mix of uses in these economic centres is being evermore considered vital to support their vibrancy. It is unlikely that this form of redevelopment alone would be able to meet the strategic housing and employment needs for the whole of Wiltshire.

2.11 Design

Q1. Why doesn't Wiltshire Council have a Design Guide, as other authorities do - including Dorset Council?

A1. Core Policy 57, Ensuring high quality design and place shaping, in the Wiltshire Core Strategy sets out the Council's approach to ensuring a high standard of design is required in all new developments. As part of the Local Plan Review, we are reviewing saved and adopted policies and will be considering whether further guidance is required. Your views on this are welcome. We also note and, of course, will consider the Government's current consultation on a draft National Model Design Code, which aims to provide detailed guidance on the production of design codes, guides and policies to promote successful design.

Q2. How can you prevent housing design being developer led?

A2. New development must be in conformity with policies in the adopted Local Plan (Core Strategy), including Core Policy 57, *Ensuring high quality design and place shaping*. However, there is also a role for the community to play in developing design policies through the neighbourhood planning process to ensure that development is locally distinctive and actively informing planning proposals.

Q3. Will Wiltshire Council adequately ensure the developments meet the "High Quality" of build mentioned? i.e. proper building controls checks, or will it rely on self-certification? What does 'high quality design' mean?

A3. New builds (and extensions or structural changes for that matter) require building regulations approval to ensure that the proposals will be built in full compliance with the planning permission. Core Policy 57 *Ensuring high quality design and place shaping* explains what the Council means by 'high quality design'. However, we welcome your views on this through the Local Plan Review consultation as we will be reviewing saved and adopted policies.

Q4. Why are we not encouraging development of areas with terraced housing up to 3 storeys high, rather than the wasteful use of land for individual housing plots?

A4. Core Policy 57, Ensuring high quality design and place shaping, priorities 'making efficient use of land'. Nevertheless, it is important to take into consideration site characteristics and the local context in delivering development that relates well to its setting and the character of the area. However, neighbourhood plans can also have a role to play in developing design policies to ensure locally distinctive development and encourage the type of housing that they feel is most suitable for their area.

Q5. Is liveability considered for new developments? For example inclusion of factors such as informal social spaces, natural spaces and play areas?

A5. Core Policy 57, Ensuring high quality design and place shaping, requires that new development ensures an appropriate level of amenity, incorporates measures to reduce the potential for crime or antisocial behaviour, designs a safe and accessible public realm and takes account of the needs of potential occupants. Core Policy 3, Infrastructure requirements requires new development to provide the necessary infrastructure including, for example, leisure and recreation provision either on-site or off-site in the local community. We welcome your views on how we can further consider 'liveability' through the Local Plan Review consultation.

Q6. What other creative, 'out of the box' measures have been considered with regards to home building?

A6. This is where we would most welcome your input as we prepare the Local Plan Review and re-consider saved and adopted policies. We also note and, of course, will consider the Government's current consultation on a draft National Model Design Code, which aims to provide detailed guidance on the production of design codes, guides and policies to promote successful design.

Q7. Has the massive change in the way we live and work in our homes due to COVID-19 been considered?

Q7. The Emerging Spatial Strategy paper recognises that the impact of COVID-19 has immediate lessons for designing space for recreation and exercise and creating the right environment to encourage people to walk and cycle. It also recognises that this is likely to increase home working permanently. This may lead to demands for more space, for example to incorporate a home office, and larger gardens. We will be considering the impact of COVID-19 through our preparation of the Local Plan Review and would welcome your input, particularly your experiences through the pandemic and potential requirements for the future.

2.12 The Consultation format

Q1. Why is this consultation happening whilst national restrictions are in place?

A1. Current Government advice is for Local Planning Authorities to press ahead rather than pause Local Plan preparation or review for an indeterminate length of time. The current Local Plan is the Wiltshire Core Strategy, which has a plan period of 2006 to 2026. The Local Plan Review is not programmed for adoption until 2023, therefore it is important that we continue to progress the Plan without delay.

This additional round of consultation is at an early stage, before a draft Plan is formulated and undergoes a further stage of public consultation. Bearing in mind ongoing COVID-19 restrictions and our adopted <u>Statement of Community Involvement</u> including Temporary Arrangements (that have been informed by Government guidance in the light of the pandemic) the main platform for engagement will be online, with provision made for those who do not have access to the internet.

Q2. How have you enabled older people, who may not be IT literate to be fully informed and consulted?

A2. We encourage those who are aware of others who may or are likely to experience difficulty accessing the consultation documents to direct them towards us using the contact details below

Arrangements are available for those without internet access to receive copies of documents by request. Please direct people to an officer in Spatial Planning who can respond to these: email spatialplanningpolicy@wiltshire.gov.uk or call 0300 456 0100 (lines open 9am - 5pm Monday to Friday) and ask to speak to an officer in Spatial Planning.

Q3. Is there a flyer or newsletter that could be created so that everyone can be made aware and participate in this?

A3. If you would like to be kept informed at key stages of the progression of the Local Plan review, along with other planning policy notifications, you can do so by joining our planning policy mailing list.

To join this notification list, please follow the link provided below, fill in your personal details and tick the 'Planning policy' option from the 'topics of interest' list. The 'areas of interest' do not relate to the planning policy mailing list.

JOIN OUR MAILING LIST

If you would like further information about how the Spatial Planning department will treat your personal information, please visit our Privacy notice - Spatial Planning and Data Protection page.

3 Calne Event specific questions – 18/01/21

During the event, multiple questions were asked about the following topics, which are answered under the 'Common themes' in **Section 2**.

- Timeframe of the plan 2.1
- Housing numbers 2.2
- Opportunities for SME builders 2.2
- Affordable housing 2.2
- The site submission and selection process 2.3
- Allocating houses in areas where people commute 2.3
- Ensuring adequate public services 2.5
- How the Plan can be flexible in order to utilise opportunities of major infrastructure improvements 2.5
- Sites for renewable energy generation 2.6
- Safe active travel routes 2.7
- Planning growth around the role out of EV vehicles 2.7
- Traffic modelling 2.7
- How the Plan will take changes to travel and work patterns in the post-Covid world into account 2.7, 2.9
- 5-year housing land supply position 2.8

- Allocating and maintaining allocations of employment land and attracting business
 2.9
- Evidence behind employment allocations and ensuring the type of employment matches housing affordability 2.9
- How the Local Plan will ensure town centres are fit for the future 2.10

Further questions, specific to Calne are as follows:

Q1. Why is there an employment land allocation when there is an excess of supply over demand? Why should Calne have any allocation for the next 5 years as it has over provided and has no proper employment strategy under a new economic appraisal?

A1. The evidence for an employment land allocation at Calne is presented within two supporting documents to the consultation – the Functional Economic Market Assessment and the Employment Land Review, both available here. On current evidence, 4ha employment land is needed at Calne. This recognises a need to address concerns about job growth corresponding to the recent increase in new homes being built at the town.

Q2. If employment is not attracted to the area, would the housing numbers be adjusted?

A2. On current evidence, 4ha employment land is needed at Calne. This recognises a need to address concerns about job growth corresponding to the recent increase in new homes being built at the town. The proposed housing requirement for Calne, with a residual requirement of just 360 homes to be accommodated up to 2036 when considering homes already built and those already in the pipeline is considered appropriate.

Q3. Isn't new demand for logistics and warehousing? Calne is not suitable for this use.

A3. The Council has reviewed existing employment land supply and evidence has identified where there may be particular needs or where it would complement planned growth. On current evidence, 4ha employment land is needed at Calne. The type of employment land required at Calne is not specified at this stage of the Local Plan Review.

Q4. The growth in Calne is marginal compared to that in Chippenham. How will the Plan ensure the growth in Chippenham does not take economic opportunities from Calne? Furthermore, what will be done to combat impacts of traffic and air pollution in Calne, due to the growth in Chippenham?

A4. It is considered that an appropriate amount of housing and employment land is proposed at Calne to meet needs up to 2036. On current evidence, 4ha employment land is needed at Calne. This recognises a need to address concerns about job growth corresponding to the recent increase in new homes being built at the town. Housing and employment land can also be allocated in the Calne Community Neighbourhood Plan.

Please refer to the supporting document to this consultation 'Wiltshire Local Plan Transport Review' - available <u>here</u> - which assesses potential impacts of growth at Chippenham and a wide range of potential mitigation measures. Further, more detailed transport impact

assessment work will be undertaken as the Local Plan Review develops, which will look in more detail at the market towns.

Q5. What, if any plans are being discussed regarding a Calne bypass?

A5. Wiltshire Council is not involved in discussions regarding a Calne bypass. It is not known if other organisations are involved in such discussions.

Q6. Could the recent closure of Calne's Co-operative supermarket give an opportunity to improve the cohesion of Calne, reduce travel to other towns by Calne residents and create the feeling of a single town through the creation of a road route from Mill/ Church Street to the Pippin?

A6. It may provide an opportunity for this, but it is understood that Wiltshire Council is not involved in discussions relating to this. This may be a consideration for the review of the Calne Community Neighbourhood Plan and any future work relating to the Calne Town Centre Masterplan. Any future re-development of the Co-op site may also provide this opportunity.

Q7. What help can Calne expect from Wiltshire Council regarding the completion and implementation of Calne's Town Centre Plan?

A7. Wiltshire Council has supported Calne in the completion and implementation of the Town Centre Masterplan and will continue to support the review of the Calne Community Neighbourhood Plan through officer support and guidance.

Q8. What are the boundary plans for the town, seeing that the latest developments by Tesco by Oxford Rd, and off of Sandpit lane and by the White House Sports centre are currently outside of the approved boundary plan?

A8. The Calne settlement boundary was reviewed as part of the Wiltshire Housing Site Allocations Plan, adopted in February 2020. It is not intended to review this boundary through the Local Plan Review but the review of the Calne Community Neighbourhood Plan can amend the settlement boundary. The Wiltshire Core Strategy and Calne Community Neighbourhood Plan set out policies on what development can occur within (and outside) settlement boundaries and planning applications will be decided against the Wiltshire development plan and any material considerations.

Q9. Shouldn't employment land allocations only be in the urban centre through PDR, conversions and retail/office closures?

A9. Applications for employment uses may be permitted through permitted development rights, conversions and in premises formerly used for retail and office uses. But the Wiltshire Core Strategy and Calne Community Neighbourhood Plan also allow for employment uses to come forward in other locations, not just in urban centres.

4 Corsham Event specific questions - 19/01/21

During the event, multiple questions were asked about the following topics, which are answered under the 'Common themes' in **Section 2.**

- Government review on housing numbers 2.2
- Indicative site numbers and how different establishments e.g. care homes are counted 2.2
- Precisely what area do the housing numbers cover? 2.2
- Consideration for a new settlement rather than adding to existing towns 2.2
- 5-year housing land supply 2.2, 2.8
- Whether different sites can be considered 2.3
- Setting conditions on new developments 2.5
- Carbon zero policies 2.6
- Assessment of flood risk 2.6
- Revised Local Transport Plan 2.7
- Sustainable transport 2.7
- Ensuring social value and suitability in developments 2.8
- How will the Council consider unemployment and predicted years of low economic growth? 2.9
- Impact on retail space and the urban area post-Covid 2.10
- Permitted development rights 2.10

Further questions, specific to Corsham are as follows:

Q1. If you are changing the definition of the areas to be covered by each plan from a community area approach to a settlement-based approach, doesn't this reduce the size of the geographical area that can take the housing around Corsham and therefore shouldn't you adjust the target numbers of houses needed as a consequence?

A1. The majority of housing and employment needs to 2036 will be met at the Principal Settlements and Market Towns. Modest housing requirements are also proposed for the settlements defined as Local Services Centres and Large Villages. Rather than include indicative housing requirements for the rest of the community areas, the Local Plan Review proposes, instead, to include housing requirements for Local Service Centres and Large Villages - see Empowering Rural Communities document.

Q2. Can we propose 5-6 small developments rather than 1-2 large ones and how would the mass builders respond to this?

A2. National Planning Policy supports the development of small and medium sized sites, particularly through site allocations in neighbourhood plans. Each site will need to be assessed on its own merits regardless of whether it is being promoted by a mass housebuilder.

Q3. Will the Council consider re-opening train stations?

A3. The re-opening of the Corsham train station is an ongoing aspiration for the town. This is supported in both the Wiltshire Core Strategy and the Corsham Neighbourhood Plan. The Local Plan Review also proposes to retain the reopening of the train station as one of the 'Place Shaping Priorities' for Corsham. The delivery of the train station will, however, depend on the commitment of a number of different parties, most notably Network Rail.

Q4. Should the 120 homes not be built in the urban centre where the facilities are? Especially as it is predicted that the main demographic growth will be for the over 70s?

A4. Wherever possible, the housing needs for Corsham should be met from within the settlement boundary for the town, preferably on previously developed land. The current plan supports this, and it is proposed that this presumption in favour of development within the settlement boundary is carried forward into the next Local Plan. However, it is also accepted that land within the settlement boundary may not be sufficient to meet the full housing requirement for the town, due to the limited availability of suitable sites. Therefore, the release of green field sites on the edge of the settlement may still be necessary to meet housing needs up to 2036.

Q5. Is the speculative Gladmand development application for 140 houses north of the Bath Road included in the numbers of houses in the pipeline? If it does not go ahead, do we therefore need to increase the number of houses on brownfield sites elsewhere?

A5. The site on Land north of Bath Road has been included in the list of housing commitments for Corsham. This site, along with others in the pipeline and new planning consents, will need to be kept under review and the housing requirements adjusted accordingly.

Q6. As part of the neighbourhood plan can we ensure that all new developments have foot paths and traffic management to ensure safe walking from the new developments to the main amenities?

A6. The Corsham Neighbourhood Plan was formally 'made' in November 2019 and forms part of the development plan for Wiltshire. Policy CNP T2 of the neighbourhood plan addresses this point as follows "Developments should provide safe pedestrian and cycle routes and improve connections within and to the town and surrounding area wherever appropriate and possible. Developments will also be expected to provide suitable cycle parking facilities in a convenient location."

Q7. Despite claims of keeping settlements such as Rudloe, Neston Westwells separate from Corsham, why does each identified greenfield site for seem to merge settlements?

A7. The sites carried forward for further assessment would not result in the merging of settlements. Land falling within the Corsham Rural Green Buffer, designated in the Corsham Neighbourhood Plan to prevent coalescence of settlements, has been excluded from further consideration for housing and employment development. However, there may be opportunities to enhance the biodiversity and landscape value of these green spaces through the release of land for development outside of the rural green buffer at sites 3 and 4.

Q8. Are there any sites in box parish that are being considered ie Rudloe area by B3109?

A8. The Local Plan Review is focusing its allocation of housing and employment land to the Principal Settlement and Market Towns. It is considered that housing provision in the rural settlements should be led by local communities, preferably through a neighbourhood plan.

Existing commitments (i.e. planning consents) near Rudloe have, however, been taken into account in determining the indicative housing requirement for the village.

Q9. The Council has a plan for providing more social housing directly. Is there any detail about how Corsham might be involved, or how more social housing might be provided? How does that fit into the overall housing provision?

A9. Wiltshire Council has a 10 year programme to deliver 1000 new council houses, existing stock is currently concentrated in the South of the County however the Residential Development Team have been tasked with expanding the new stock throughout the County.

The Residential Development Team currently have a programme for the first 3 years of delivery and this does include a site in Corsham. Homes delivered at Corsham through this programme will contribute to the housing supply for the town.

If you have any further questions regarding the Council's new build programme please direct these to Housing.strategy@wiltshire.gov.uk.

5 Royal Wootton Bassett Event specific questions – 19/01/21

During the event, multiple questions were asked about the following topics, which are answered under the 'Common themes' in **Section 2**.

- The timescale of the plan 2.1
- Housing needs for different groups of people 2.2
- How the housing numbers have been calculated 2.2
- Identifying brownfield sites 2.3
- The site selection process and use of housing market areas 2.3
- The sustainability appraisal process 2.3
- The role of the Neighbourhood Plan alongside the Local Plan 2.4
- Existing/new community infrastructure **2.5**
- Addressing climate change, biodiversity loss and carbon zero development 2.6
- Sustainable and active travel 2.7
- Ensuring developers follow through with commitments 2.8
- 5-year housing land supply 2.8
- Delivering employment land 2.9
- The impact on retail and the high street 2.10

Further questions, specific to Royal Wootton Basset are as follows:

Q1. Are there any future plans for a bypass to relieve traffic pressures in the town?

A1. The 'Planning for Royal Wotton Bassett' document identifies a bypass as a transport opportunity but there are no concrete plans at this stage. Further work will be undertaken to understand the transport effects of new development and infrastructure improvements required to deliver against the strategic priorities for the town.

Q2. Are their aspirations to include a site for a Parkway Station?

A2. The 'Planning for Royal Wotton Bassett document identifies a parkway station as an opportunity but there are no concrete plans at this stage. Further evidence will be gathered to identify possible transport infrastructure schemes and if, how and where they could be delivered.

Q3. How will the Council ensure local people will have a say in how the land in Royal Wotton Bassett is used? How can the community have a say in what community facilities are built?

A3. Through the current consultation, and forthcoming consultation on the draft Local Plan Review at the end of the year, where local people can state their views on sites. Through formal and informal engagement with the Town Council during the neighbourhood plan review process.

Q4. Is the location of sites 1 and 2 appropriate? Are they considered to be in Royal Wotton Bassett or the adjoining rural parish? How will the additional traffic pressures from these sites be addressed? Particularly the M4 junction and getting into Royal Wotton Bassett?

A4. Sites have been identified around Royal Wootton Bassett irrespective of which parish they fall in. It is considered that there are no overriding issues that would warrant their exclusion at this stage. Further work will be undertaken to understand the transport effects of new development and infrastructure improvements required. Appraising sites outside the parish of Royal Wotton Bassett is appropriate and extensions to a town can cross parish boundaries.

Q5. How will the 6Ha of employment land be delivered – there has been no new employment land in recent years?

A5. At this stage the Council has identified a proposed employment requirement based on analysis of past trends and future aspirations/need in the Housing Market Area. The Council will continue to review and build the evidence on what type of businesses require land at Royal Wotton Bassett, and how it could be delivered.

Q6. Are the housing numbers in Royal Wotton Bassett a consequence of other Principal Settlements not meeting their housing targets?

A6. No. Principal settlements fall into different Housing Market Areas (HMA), and the Swindon HMA requirements were tested through the Alternative Development Strategies.

Q7. Site 1 - Marsh Farm has previously been rejected. It is thought to have poor drainage and be outside the settlement boundary – is this site appropriate?

A7. The constraints are noted. This was in the context however of a planning appeal decision in response to a specific proposal. The site has no overriding constraints at this stage but will be subject to further assessments like all other sites shortlisted. That analysis may result in elimination of the site or could tell us under which circumstances development may be appropriate.

Q8. If the sites to the north and east of the town were developed, wouldn't this risk amalgamation with Swindon? However the sites to the south appear to require significant improvements in transport infrastructure.

A8. All sites in the pool have constraints, but none are currently viewed to warrant site exclusion. The risk of coalescence with Swindon was one of the considerations relevant to sites closer to the M4 Junction that were excluded, in addition to their distance from the settlement. All sites will be subject to further appraisals going forward, including their ability to deliver sustainable transport solutions that deliver against the strategic priorities.

Q9. Does the Council regard the canal as a significant amenity and will canal restoration be included in s106 commitments?

A9. Yes, the canal restoration is identified as a place shaping priority. S106 contributions must meet the six tests in national planning policy, so not every site that receives planning consent and is subject to S106 will be required to contribute to restoration. Canal restoration could feature in the Infrastructure Delivery Plan which will form the basis for infrastructure priorities in Wiltshire, which will identify potential funding sources.

Q10. Why do some of the potential development sites not reflect the SHELAA sites? Shouldn't they be assessed on those extents?

A10. Some sites were reduced to exclude parts that benefit from planning permission for example.

Q11. Hasn't Royal Wotton Bassett already reached the number of houses required to 2026, only needing 185 more to reach 2036 target mentioned, and not 990?

A.11. The figure of 990 is calculated as follows: Start with the proposed new requirement for the Town of 1,255 new homes over the period 2016 to 2036 and take off completions over the period 2016 to 2019 plus any outstanding planning permissions/allocations that are likely to be implemented over the period 2019 to 2036.

The figure of 185 homes we think has been arrived at by just extracting the emerging requirement of 1,255 homes from the Wiltshire core strategy figure of 1,070 homes. The core strategy period started in 2006, so the first 10 years of housing delivery won't count towards the new plan period, which starts in 2016.

6 Chippenham Event specific questions – 20/01/21

During the event, multiple questions were asked about the following topics, which are answered under the 'Common themes' in **Section 2**.

- Timescale of the Plan 2.1
- Timescale of the Plan 2.1
- Scale of Growth 2.2
- Affordable Housing Provision 2.2
- Climate Change 2.6
- Transport 2.7
- Infrastructure 2.8
- Employment and Retail Evidence Post Covid 19 2.9, 2.10
- Design **2.11**

Further questions, specific to Chippenham are as follows:

Q1 Are you consulting with neighbouring Bremhill Parish Council?

A1. Town and Parish Councils are being consulted as part of this Local Plan consultation.

Q2 Why aren't you only considering brownfield sites? The Council seems to have forgotten about the climate emergency and biodiversity crisis and the need to retain, and in fact, enrich our green spaces.

A2. The proposals include a brownfield target for development on brownfield sites over the next ten years. For Chippenham this is 240 homes. The amount of new development proposed exceeds what can be provided on brownfield sites in Chippenham and does require greenfield land to be considered. The concept plans for the proposed sites do include greenspace and consider net biodiversity gain.

.An <u>Addressing Climate Change and Biodiversity Net Gain</u> document is also included as part of the consultation and views are sought on this and how the Local Plan policies can be developed in this regard.

Q3 Are you retaining the heritage features of the cycle path and former canal route?

A3. The North of the North Rivers Cycle Path and the safeguarded route of the West and Berks Canal are retained. Both have been identified as green infrastructure corridors.

Q4 How many households are in Chippenham? Has this changed over the past five years?

A4. There were 7095 households recorded as living in the Chippenham Community Area in the Census 2011. Population figures produced by Office for National Statistics (ONS) are available at https://www.wiltshireintelligence.org.uk. The number of households is likely to have increased since then.

Q5 What are the carbon emissions associated with building a new railway bridge, two river bridges and a road?

A5. The <u>Addressing Climate Change and Biodiversity Net Gain Paper</u> which is included in the Local Plan consultation sets the policy themes which will help support the plans objective in respect of adapting and mitigating climate change and is asking people to provide feedback in order to help develop our evidence.

Q6 How do you justify building on farmland when climate change projections indicate food supplies will be disrupted and county farms will be required to feed the county?

- Q7. What is the plan for local food? Retain the existing farms which are council owned with farm shops The farm could also be used for photography courses, wildlife projects, artist workshops and much more to enhance the area not destroy it.
- Q8. What value has the plan put on the high quality farmland, biodiversity and wildlife habitat that this Plan will destroy? (ecological assets) How has this been done and what is the value calculated for the different Chippenham sites?
- A6, A7, A8. The <u>Emerging Spatial Strategy</u> and <u>Planning for Chippenham</u> documents say that needs for development should be met as far as possible on brownfield sites in order to help minimise the loss of greenfield sites. The Council suggests that a target of 240 homes

could be built in Chippenham on brownfield sites over the next 10 years. This is far lower than the indicative residual housing requirement of 5100 homes identified for the town, hence why greenfield sites have been identified. The consultation asks whether there should be a brownfield target and if so, should it be higher or lower?

Q9 What policies are you proposing to prevent the coalescence of Chippenham and Studley and Derry Hill? With the Solar Farm development, all the open countryside will be developed. How does this fit with your strategic priority of respecting the separation of outlying villages?

A9. The Site assessments in the <u>Chippenham Site Selection Report</u> refer to impact on the separate character of Old Derry and the distant views to Derry Hill from parts of some sites. The Concept Plans for the proposed sites include green infrastructure and this includes structural woodland planting to help screen views.

The Solar Farm proposal is entirely separate to the Local Plan and is not being promoted by Wiltshire Council. A planning application has yet to be submitted and determined.

Q10. Will the plan include leisure needs?

A10. A Settlement Profile contained in the <u>Planning for Chippenham</u> document summarises measures in place or being put in place to address known infrastructure issues and their timing, what additional provision would be needed to support growth and what other opportunities there may be. These have been used to shape the concept plans and they include sport and leisure provision. Your views on these are invited.

Q11 How will you prevent Chippenham becoming a dormitory town for workers travelling to Bath, Bristol and London?

Q12 Chippenham is already a dormitory town for Bath, Swindon, Bristol and London with all the commuting and consequences for the environment. How will this be reversed?

A11, A12. One of the draft Place-shaping Priorities identified for Chippenham is to provide new employment opportunities to redress net out commuting and enable people to live and work locally. The proposals for Chippenham include employment land.

Q13. The Council was proposing 3,000 homes for Chippenham in 2018. Why has this changed?

A13. In 2018, the Town Council were consulted on work in progress suggesting 7,000 dwellings, with 3,000 dwellings remaining to be planned for. This took forward the current Wiltshire Core Strategy. Since when, as explained in the Local Plan Review consultation material, an alternative development strategy has tested more preferable that has a greater focus for growth on the town than the current approach. This proposes around 9,000 dwellings and 5,000 dwellings remaining to be planned for. Views on this proposal are invited.

Q14. Why is the Council consulting separately on road options? Is the selection of East Chippenham sites predetermined?

A14. The road options are being consulted upon separately by Future Chippenham. Details of how to take part in that consultation can be found on the Council's website at: www.wiltshire.gov.uk/future-chippenham

The Local Plan Review proposals for Chippenham are explained in the <u>Planning for Chippenham</u> and <u>Chippenham Site Selection</u> reports, which are available as part of the Local Plan consultation. The selection of sites at East Chippenham has not been predetermined

Q15 Will the plan set out design requirements?

Q16. Can you ensure that houses will look better than that awful carpark?

A15, A16. Yes, the plan will include design requirements. The concept plans for the proposed sites at Chippenham have been informed by a series of design principles.

Q17. How will you stop Bath companies moving into Chippenham, causing congestion and not bringing any benefit to the area as none of the staff live in Chippenham?

A17. Our Employment evidence is set out in the Employment Land Review report. This hasn't identified employers moving into the area as being an issue, instead the issue has been about out commuting. New employment investment in Wiltshire benefits the area by providing job opportunities.

- Q18. How will you guarantee the jobs are well paid and not minimum wage?
- A18. This is not a Local Plan issue.
- Q19. Given the Good Energy building fell through due to lack of demand, does this suggest the demand in Chippenham is lower than you are estimating?
- A19. The Local Plan is a long-term plan and is looking forward up to 2036.
- Q20. Please can you consider the changes to Bath with remote learning reducing housing requirements for students which will be freed up for people working in Bath and commuting from Chippenham?
- A20. The Council will consider whether any updates to our evidence are necessary in the light of the current pandemic. However, this plan does look towards 2036, so we are planning long term.
- Q21. There are 32 business premises empty, please can we have evidence of this demand, we also have brownfield sites not used for many years?
- Q21. The employment land proposals are based on evidence set out in the Employment Land Review report, one of the supporting documents available as part of the Local Plan consultation. If you have any new information or comments to submit about this evidence such as details of the 32 empty premises, then please submit comments directly to the Local Plan consultation.
- Q22. The current core strategy has allowed for employment land to be developed off J17 without any sustainable links for workers to travel to work. How will the new local plan ensure that any housing or employment development which is permitted is well

connected to ensure sustainable travel and reduce dependency on the car and not create isolated islands? How will the local plan address and improve connectivity to existing employment and housing in the town?

A22. One of the draft Place shaping priorities identified for Chippenham is to ensure a network of well-connected footpaths and cycleways and connectivity for public transport across the town. The proposals for Chippenham are mixed use sites and include connectivity links.

Q23 Is the employment land at Junction 17 M4, already permitted, counted in the Chippenham employment land allocation? Will any future employment land allocation at Jt17 be counted as Chippenham employment land?

A23. The M4 J17 employment land does not form part of the existing Chippenham employment land allocation and won't be part of meeting any future Chippenham employment land requirement.

Q24 How will start up and small businesses of a technical nature be accommodated in sites without crushing rates and rents. What is the council approach of accommodating urban centre blocks of multiple use offices?

A24 Rates and rents are not a Local Plan matter. Employment evidence is set out in the Employment Land Review report and this informs any site allocations.

Q25. What is the level of out commuting from Chippenham?

A25. The <u>Wiltshire Transport Review</u> report has analysed data from the Census 2011 Travel to Work data. The <u>Employment Land Review</u> report identifies that there are high levels of out commuting from Wiltshire. Both reports are available to view as supporting documents.

Q26 Chippenham train station draws traffic from as far away as Bristol, why should Chippenham residents suffer and why isn't Corsham train station being opened to relieve this pressure? Chippenham is the busiest train station in Wiltshire and cannot take extra commuters from these new houses without impacting on existing residents.

A26. As part of the Department for Transport's (DfT) Restoring Your Railway Ideas Fund, the council submitted a bid to restore secondary services on the Great Western Main Line. As well as improving connectivity between Bristol to Oxford (and potentially further east) this would help realise new stations at Corsham and Royal Wootton Bassett / Swindon West. While the bid was unsuccessful, officers are liaising with the DfT and key stakeholders/partners to establish next steps.

Q27. What about the downstream flooding caused by excessive runoff from previously absorbent meadows?

Q28. Flood risk is growing. Why choose to build houses ie sites 1 and 2 on flood plain areas? This will cost a fortune and ruin profitable farmland. Eastern sites are a particular concern.

A27, A28. A <u>Level 1 Strategic Flood Risk Assessment</u> has been carried out and the report is available as one of the supporting documents in the Local Plan consultation. The evidence

has informed the site selection process and the Concept Plans illustrate that the flood plain will be kept free from built development.

Q29 Will Wiltshire Council commit to act as developer or joint developer on land it owns (Sites 1 and 2) to ensure that high quality design is realised, and not sold to volume housebuilders to do the usual?

- A29. This isn't a Local Plan matter.
- Q30. Do the proposed sites take into account the proposed link road?
- A30. Yes, the proposals for Chippenham include an eastern and southern link road.
- Q31. Expanded Sports ground? Option three of the proposed road goes straight through the present provision at Stanley Park so what is meant by this?
- A31. The proposals for Chippenham included in the Local Plan consultation incorporate Stanley Park Sports Ground.

The consultation on the road options is being carried out by Future Chippenham and is not part of the Local Plan Review process.

- Q32 Where can we see the evidence base for Chippenham Housing Growth?
- A32. The <u>Emerging Spatial Strategy</u> and <u>Planning for Chippenham</u> documents explain the evidence base for the housing growth now proposed.
- Q33. Are the forecasts based on need or have they been influenced by political desire to grow Chippenham to a regional centre without the support of the local residents and insufficient coordinated whole town approach?
- A33. Chippenham is a Principal Settlement, alongside Trowbridge and Salisbury, in the existing adopted Wiltshire Core Strategy. The proposals in this Local Plan consultation continue with the focus on Principal Settlements.
- Q34. Please provide information on the build out rates of already approved housing developments, and how this compared with the expected build out rate when the developments were approved.
- A34. The Wiltshire Housing Land Statements provide updates on housing delivery in the County. They are available on our website at https://www.wiltshire.gov.uk/planning-policy-monitoring-evidence.
- Q35. If the residual need for houses is 5100, where is a new development of 7500 being proposed to the east of Chippenham?
- Q36. Will Wiltshire Council seek to allocate all of the 7,500 homes in the Local Plan to ensure the full HIF funding of £75m can be repaid?

A35, A36. The proposal for 7500 homes is by Future Chippenham.

This Local Plan is a separate process and is proposing 5100 additional homes over the plan period to 2036 based on the evidence set out in the Local Plan consultation reports. The Emerging Spatial Strategy and Planning for Chippenham documents explain the evidence base for the housing growth proposed in the Local Plan. Views are welcomed.

Q37. How do the Council's housing figures fit with evidence gathered in the Chippenham Neighbourhood Plan which has indicated much lower numbers, similar to Wiltshire's original numbers?

A37. This Local Plan Review is for the period 2016- 2036. The Local Plan sets the strategic context for Neighbourhood Plans and so for emerging Neighbourhood Plans the Council suggests proposals within them area in tandem with the emerging Local Plan.

Q38. How can you ensure local schools, shops facilities will be built and not disappear from the plans as they did with the Cepen Park development?

A39. A Settlement Profile contained in the document 'Planning for Chippenham' summarises measures in place or being put in place to address known infrastructure issues and their timing, what additional provision would be needed to support growth and what other opportunities there may be. These have been used to shape the concept plans. The preferred sites show a mix of uses that include schools and community facilities. Facilities will be secured by legal agreements with a developer when planning permission is granted.

Q39. Two primary schools were allocated in the plan, but the schools are built after the houses, putting great pressure on the local schools. Also, no mention regarding secondary schools. All those primary children will eventually get to secondary school age so how will they be guaranteed a place in the school of their choice in Chippenham? Hardenhuish and Sheldon are already full.

A39. The concept plans for Sites 1, 2 and 3 include 5 new primary schools and a new secondary school. These have been included as a result of evidence provided by the Wiltshire Education Authority. A summary of the education requirements is also included in the Settlement Profile table, within the 'Planning or Chippenham' document.

Q40. Are you planning any houses near the new business sites at Junction 17?

A40. The Local Plan Review isn't considering sites for housing at M4 J17.

Q41. Will the Chippenham Neighbourhood Plan be able to influence these sites given that they are largely outside the Chippenham Town boundary?

A41. The designated area for the Chippenham Neighbourhood Plan does extend beyond the town settlement boundary and does include some, but not all of the land identified as the preferred sites for Chippenham. There will be an opportunity for the Neighbourhood Plan to inform the work for these sites.

Q42. The Chippenham Neighbourhood plan survey indicated the people of Chippenham did not want further urban sprawl. How do you justify ignoring the wishes of the people of Chippenham?

A42. The development illustrated in the concept plans do not constitute 'urban sprawl'. The reasons for these proposals are explained in the Local Plan consultation documents. The proposed sites in the Local Plan are mixed use sites and include a range of community uses, paths and green areas as well as housing and employment.

Q43. How will you be working positively with Chippenham Neighbourhood Plan going forward, as there is an overlap in certain policy areas e.g. design of new housing?

A43. The Council wishes to work with the Town Council and Neighbourhood Plan as the Local Plan Review work continues.

Q44. Which part of the new distributor road are you envisaging coming first? East Chippenham or South Chippenham?

A44. Evidence prepared so far as part of the <u>Wiltshire Transport Review</u> report indicates the Eastern Road would come first.

Q45. Is it a given that an Eastern Link Road will be built to accommodate the growth expectations?

A45. <u>Wiltshire Transport Review</u> has identified that any meaningful growth would require a new Eastern Distributor Road connecting the east of the town to the A350 to the north.

Q46. Are you anticipating that the relief roads will be entirely development funded, and if not, has top-up funding been identified/secured?

A46. The funding of the road will need to be assessed later on in the process.

Q47. Why is there a difference in the indicative road routes as shown in the consultation on Future Chippenham as compared to the Local Plan Review?

A47. The concept plans illustrate how the development may take place and have been drawn to give an indication of a potential layout for new development. The road route shown is indicative. It has been developed solely on the basis of evidence gathered so far preparing the Plan. As the local plan review progresses and if these sites do go forward, then further work will take place to refine the proposals.

The Future Chippenham project is examining alternative road routes as a consequence of its successful funding bid from the Housing Infrastructure Fund. This is a separated consultation to the Local Plan.

Q48. What are the plans for the comment that the plan is to look at the 'resilience of the town centre?

Q48. In the Planning for Chippenham, the place shaping priorities describe specific improvements in the town centre. The draft Place shaping priorities have been developed following discussions with the Town Council.

Q49. Will you take into account allocated sites where a previous application has been declined?

A49. Yes, the sites considered as part of the site selection process are sites included in the Strategic Housing and Employment Land Availability Assessment, some of which have previously had a planning application refused.

Q50. The proposals for Chippenham show small areas of land allocated for renewable energy. Whilst it is wholly appropriate for the plan to make provision for renewable energy developments, have the specific allocations taken account of grid connection and viability issues?

A50. The settlement profile included in the <u>Planning for Chippenham</u> document includes evidence on energy provision in Chippenham. Views are sought as part of this consultation.

This evidence will be updated if necessary. A Viability Assessment will be carried out as part of the next stage of the Local Plan Review.

Q51. How can we safeguard identities of our local communities and villages with the proposed growth of Chippenham?

A51. The Concept Plans for the preferred sites include green infrastructure and this includes structural woodland planting to help screen views.

Q52. Have the landowners been consulted?

A52. The sites considered are all included in the Strategic Housing and Employment Land Availability Assessment at the request of landowners and developers. The purpose of this consultation is to seek the views and comments of a range of people, including landowners.

Q53. What do you mean when you say Chippenham is less environmentally constrained? This sounds like our countryside has been given less value than other areas. The Marden valley is equally or more valuable ecologically than many other parts of Wiltshire.

A53. Chippenham does not have significant constraints to rule sites out an early stage e.g. designated Green Belt. The <u>Interim Sustainability Appraisal</u> appraises the sites against a range of objectives including for landscape and biodiversity and this has informed the site selection process, explained in the Chippenham Site Selection Report.

Q54. You have discounted the Langley Burrell site on two points, one a grade two listed manor house and that the village would be swallowed up by Chippenham. Is this not the case for the village of Pewsham which also has a grade 2 listed manor house as well as several listed buildings? You fail to mention the village calling it Forest Gate when in fact it is Forest Gate Farm in the village of Pewsham.

A54. Pewsham isn't a village which is recognised in the settlement hierarchy established in the Wiltshire Core Strategy and so it isn't specifically mentioned. Site 3092 which farms part of the proposed Site 1 is called Forest Gate Farm in the Chipppenham Site Selection Report Stage 2 assessment. The landscape assessment acknowledges there may be an impact on the separate character of Old Derry Hill, which includes the older part of Pewsham along the A4. Not all listed buildings have been identified, only those which are within or in close proximity to the sites, many of which are either Grade 1 or 2* listed. The Interim Sustainability Appraisal includes assessments for all the sites and SA Objective 7 is "Protect, Maintain and enhance the Historic Environment". Views are sought on the Interim Sustainability Appraisal as part of this consultation.

Q55. Why have you selected sites to the east of Chippenham as preferable to those on the western side of the town? The eastern side of the town has a rail and river crossing required as well as building across large flood plain areas. The western side of the town already has the right infrastructure to serve housing and employment growth.

A55. A site selection process has been carried out which has led to the proposals which are now being consulted upon and explains the reasons why other sites have not been selected. This is explained in the Planning for Chippenham document_and Chippenham Site Selection Report.

Q56. Tracts of the land that have been included in the sites in this consultation have been considered in previous planning cycles and were found at that time either unsuitable for development or not supported. Where can one find records of these decisions and the rationale behind them?

A56. Further information about the adopted Wiltshire Core Strategy, Chippenham Site Allocations Plan and Wiltshire Site Allocations Plan are available on our website.

Q57 The housing numbers and the preferred development sites have already been decided for Chippenham before any consultation has begun? How is this possible?

A57. This is not the case. The consultation specifically asks for views on the appropriate scale of growth, place shaping priorities and preferred sites. The purpose of the consultation is to seek feedback and comments about the work carried out so far. Any comments made in response to the consultation will be considered and changes made if considered appropriate.

Q58 The Planning Inspector in 2016 did raise the issue of flood risk in the last Local Plan for the East of Chippenham, why is the Council still pursuing this location?

A58. The Inspector in his Chippenham Site Allocations Plan Examination Report did not exclude the East Chippenham site from further consideration.

Q59. Has viability/deliverability of the preferred allocations been assessed/tested, and will early phases be allowed to come forward to maintain continuity in housing land supply given the reliance of a small number of large sites and the lead times for first housing delivery?

A59. Viability testing will take place as part of the next stage of the Local Plan process. No decisions have been made yet about phasing.

Q60 If you build excess houses won't this lead to increased migration rather than increased migration leading to increased housing demand?

A60. The Swindon and Wiltshire Local Housing Needs Assessment contains the evidence for the higher 45,600 homes housing requirement. This is one of the supporting documents available as part of the Local Plan consultation and views on sought on the proposals.

Q61 How are you going to ensure the sprawl of Chippenham does not go beyond the boundaries agreed and encroaches on the rural area boundaries

A61. The consultation is intended to tackle difficult and controversial issues around where urban areas should expand as early on in the process as possible. Such decisions need to made without regard to civil administrative boundaries.

Q62. When did Chippenham change from a Market town become a Principal settlement?

Q63 What about Chippenham's identity as a small market town?

A62, A6. Chippenham is designated as a Principal Settlement in the adopted Wiltshire Core Strategy.

Q64 Please could you tell me what 2 or 3 things we can do to stop this plan dead in its tracks? Is there anything that will change the course of this?

A64. The process followed for the Local Plan Review is set out in legislation. The purpose of this Local Plan consultation is to seek feedback and comments about the work carried out so far. Any comments made in response to the consultation will be considered and changes made if considered appropriate.

Q65. Will Chippenham poach employers from nearby towns as employment land becomes available?

A65. The Employment Land Review report has identified a need to provide additional employment land at a number of towns.

Q66 Aren't these proposals simply 'business as usual'? (more roads, more commuters, more environmental destruction?). Shouldn't we be planning for a future that reduces car dependency and commuting? How does this plan do that by creating a massive commuter town?

A66. A sustainable pattern of development that promotes self-containment and reduces the need to travel is a central part of the Local Plan.

Q67. Is Supported Housing included in this proposal?

A67. The proposals will include a range of housing types. Currently, the proposals do not specifically include supported housing at Chippenham. This will be explored further as part of the next stage of the Local Plan Review

Q68 Such a large number of extra houses will increase motor traffic. Does the traffic modelling include the impact on rural roads outside Chippenham and particularly those in Bremhill Parish?

A68. The <u>Wiltshire Transport Review</u> report, available as part of the consultation has used the Wiltshire Strategic Transport model to review analyse the impact of Local Plan growth on the road network. This includes roads throughout the County.

Q69 How will the local plan address - traffic congestion points, access the town centre, access to the railway station and bus station (as no single cross town public transport bus route) and likely traffic bleed into surrounding villages/ A4 and A342 to avoid bottlenecks around Melksham?

Q70 Will there be a new transport strategy for Chippenham that is aligned with this additional growth? And in light of the climate emergency will it focus more on sustainable transport measures including LTN 1/20?

Q71. If you accommodate the congestion of Chippenham with a new road, how do you then propose to accommodate the congestion with residue traffic through the villages, particularly on the A4 with all the new houses?

A69, A70, A71. The <u>Wiltshire Transport Review</u> report, available as one of the supporting documents for the Local Plan consultation provides initial analysis of the impact of new development on the transport network. Sustainable transport measures are included e.g. Cycle routes and public transport connectivity. Further work will take place as part of the

next stage of the Local Plan Review to define specific additional measures required in and around the town as a result of new development.

Q72 The transport implications for the East Chippenham housing will have significant impact on West Calne why this has not been modelled or if it has, can we see the results

A72 The <u>Wiltshire Transport Review</u> report has modelled the impact on surrounding roads and towns. The report is available as one of the supporting documents for this consultation.

Q73. There is desperate need of more parking in the Town Centre - this is not mentioned - why?

Q74. We need more cycle paths, pleasant footways and better bus connectivity. More car parking is very regressive.

Q75. Great to see that one of the place shaping priorities is around footpaths and cycleways. Does this mean you will be building tarmacked segregated cycle lanes (not shared used paths) alongside all roads to, and within, new developments - as that hasn't been the case in the past?

A73, A74, A75 The <u>Wiltshire Transport Review</u> report, available as one of the supporting documents to this consultation includes car parking information. This says that all three Principal settlements have been shown to have spare parking capacity but face differing obstacles to the implementation of effective parking policy. A Parking policy will be tailored for each settlement to have the most impact on the conversion of car trips to public transport and active mode trips. Sustainable transport measures including cycle paths, footpaths and bus connectivity will be included in the proposals.

Q76. What is the status of the road, i.e. 2 lanes or 4 lanes?

A76. The precise road details are not known at this stage.

Q77. The concept plans seem to be based on one of the new road options, suggesting the road option has already been made. why has the plan been done in advance of the road decision?

A77. The road shown on the concept plans is indicative based on evidence gathered so far preparing the Plan. Following this consultation, if taken forward, further work will take place to refine the site details including the route of the road.

Q78 Does the fact that Wiltshire Council already own a lot of the land for proposed development come into the decision-making process, and what happens to the tenanted farmers currently working the land?

Q79. Can you assure the residents of Chippenham that this plan is not just to fund the Stone Circle businesses with the sale of council farms and assets?

A78, A79. The process followed for the Local Plan Review is set out in Local Plan Regulations. Wiltshire Council is required to have an up to date Local Plan.

Land ownership is not a consideration.

Q80 Will the Census 2021 data be available to be used?

A80. It will depend on when data from the Census 2021 is published by Office of National Statistics.

Q81 If nothing is "set in stone" and that's why you're consulting, how do we stop it?

A81. Comments are invited as part of this consultation. All comments received will be considered and changes made if appropriate.

7 Tidworth and Ludgershall Event specific questions – 20/01/21

During the event, multiple questions were asked about the following topics, which are answered under the 'Common themes' in **Section 2**.

- Neighbouring authorities 2.1
- Telecommunications 2.5

Further questions, specific to Tidworth and Ludgershall are as follows:

Q1. Is the 5 hectares of employment land in addition to Castledown Business Park or partial development of the park?

A1. The 5 hectares proposed are in addition to Castledown Business Park. More information can be found in paragraphs 18 and 19 of the Planning for Tidworth and Ludgershall and Emerging Spatial Strategy consultation papers.

Q2. Why is there only one priority for Tidworth? How will you promote and regenerate Station Road?

A2. Currently, there has only been one priority that has arisen that is specific to Tidworth. This list is expected to grow, and the consultation will allow us to understand what other priorities may need to be added that are specifically relevant for Tidworth.

Q3. We have a few supermarkets in the area but must travel for more shopping, how would the local area be looked at with regards to addressing this?

A3. Initial findings through work with the town councils and through the Wiltshire Retail and Town Centres study 2020 suggest that based on the expenditure capacity of the local population, which takes account of forecast increases through housing growth, there are limited opportunities to attract higher levels of retail and/or food and beverage floor space. We understand that these uses are desirable in increasing the local offer, but one approach could be to allocate mixed-use residential and/or employment developments which help to support new commercial uses.

Q4. Most of our employment is related to the Armed Forces, how can we offset the potential that we lose that employment without more commuting a distance?

A4. Allocating additional employment land could be a way to achieve a more diverse local economy. However, we recognise that our current employment evidence will need to be kept under review to reflect ongoing economic effects such as COVID. As the economy rebalances post COVID we will need to examine in more detail market demands in terms of

the type and size of sites, to understand how a range of employment uses could be delivered to help meet the employment needs of the local community.

Q5. Could we look at CBP (Castledown Business Park) land for retail and leisure use as well as business?

A5. At this current time, any proposal for Castledown Business Park that is predominately for a retail use would be contrary to Core Policy 35. The Local Plan Review provides us with the opportunity to consider whether Core Policy 35 remains fit for purpose. Nonetheless, it is understood that the site is being marketed for business uses in the short-term and any applications relating to the site will be tested against Core Policy 35.

Q6. Do you see Ludgershall taking the majority of the 165 houses required during the plan period, rather than Tidworth?

A6. At this current time all of the sites within the pool identified have an equal chance of being allocated in the emerging plan as more detailed assessment is yet to be carried out. We are expecting that more sites may be identified through this consultation and equally some may be removed. A neighbourhood plan by both or either of the towns could be a tool to support the delivery of this housing requirement in part or whole.

Q7. What are the key factors behind a reduced housing requirement when compared to the current Core Strategy? Infrastructure, such as extending Empress Way eastwards to the A342, will not be feasible with the planned level of growth.

A7. The indicative housing requirement presented in this consultation comprises a roll forward of the existing Core Strategy's strategy. In other words, the distribution of housing numbers across the main settlements within Housing Market Area is broadly similar to that set out in the Core Strategy. However, the housing need for the Salisbury Housing Market Area is projected to be slightly lower for the period 2016-2036 than the previous plan period of 2006-2026. For the Tidworth/Ludgershall area, it amounts to a difference of around 200 homes (1750 homes required 2006-2026 to 1555 homes required 2016-2036).

Q8. What are the drivers and factors needed to determine the viability of a train line extension to the East?

A8. As a transport development/enhancement, there are many different stakeholders. Significant funding would be required to deliver such a project and the operational costs are taken into account. Work published by the Swindon and Wiltshire Local Enterprise Partnership (LEP) in 2019 identified that the operating costs were unlikely to be viable without ongoing additional funding. We will continue to work with our Sustainable Transport colleagues and the LEP to ensure all opportunities to enhance rail services are positively explored.

Q9. Can you provide more detail around the extension of Empress Way to alleviate traffic volumes through the A342?

A9. This is a priority that has been identified through work with Ludgershall Town Council. It has been seen as a solution to taking pressure off of Andover Road, particularly during commuter periods. As part of the evidence gathering process we have presented this, but need to remain open minded to other solutions relating to alleviating local traffic and transport issues. The delivery of the road would need to be developer funded and potentially

requiring a large scale of growth to support its continuation and completion. The long-term requirement for the road, particularly in light of changes to commuter behaviour and the potential environmental impact of increased car use are considerations in addition to transport assessments to understand if the road is a solution or displaces a problem.

Q10. What about the border between Ludgershall and Test Valley? I believe they also have areas here put on their SHELAA?

A10. Test Valley Borough Council are also undertaking the preparation of a Local Plan. Their forecast adoption date falls around the same time as our own forecast adoption date for the Local Plan Review. The most recent iteration of the Test Valley Strategic Housing and Employment Land Availability Assessment included two sites to the east of Ludgershall, within the Test Valley Borough Council boundary. This is available on their website. It is an indication that these sites are available and being actively promoted for housing, however we are working with Test Valley Borough Council as part of our Duty to Cooperate and at this time our respective strategies do not look to undertake detailed assessment of these sites. A neighbourhood plan for Ludgershall could look at the wider Ludgershall area and could allow the local community to influence any future development.

Q11. Do all 165 new homes need to be houses? Developments should focus on maximising the amount of land we build on through building upwards. A more modern approach for a growing town like ours would see fewer houses built and a greater number of apartments.

A11. This is a significant point of interest and there may be opportunities for developers to propose housing of different types and styles across the two towns. However, there will also be a need to respect the existing character of the location and ensure sufficient access to outdoor space etc.

Q12. Hasn't the approximately 1000 houses over the past 5 years taken all of the suitable sites, apart from a few 'fill-ins'? What might look good on the map isn't always so good when you stand on the ground.

A12. We're yet to test the pool of sites that we have identified in more detail, however we may find there are more suitable sites during the plan making process. Infill developments play an important part in delivering different types of housing, but where there continues to be a strategic need for more homes as a Local Planning Authority, we are responsible for identifying land to accommodate these.

Q13. Does the council consider abandoned properties? Will the re-occupation of those homes which have been empty for 12 months+ be included in the 165 new dwellings?

A13. The strategic housing requirement relates to homes in addition to that which are already built. As such the reoccupation of homes already on the market do not fall into the housing requirement figure, unless that house was redeveloped to provide additional self-contained dwellings.

Q14. Is there anything specific planned to address climate change, such as cycle lanes going east from Ludgershall? This is within Hampshire but Ludgershall residents would/could use them. Would the development of the train line linking to Andover contribute directly to the climate change agenda?

A14. The delivery of a strategic cycle network and/or the opening of the rail line for commercial services would be able to play a part in addressing climate change, however at this time there are no specific planning projects relating to these. The Local Plan will, along with the emerging Local Transport Plan 4, be setting policies that encourage greater opportunities for pursuing walking and cycling (active travel) as such measures can play an important role in reducing unsustainable, carbon-based modes of transport.

Q15. From a Climate Change perspective, I think a carbon neutral rail link from Ludgershall to Andover and the East is a great idea long term. Would plans to commercialise the Ludgershall rail link include a shuttle bus service between Ludgershall and Tidworth? Cost is also key, if it's going to be viable, the Council must ensure that passenger fares are kept low to incentivise the use of railway service.

A15. The place shaping priority looks to identifies the commercialisation of the railway line as a project to support long term growth. It is unclear if any detailed work has been done by stakeholders to understand aspects such as a shuttle bus or fare prices.

Q16. What about Doctors, and shopping, we have a lot of older people in Ludgershall who cannot get on the bus?

A16. The Planning for Tidworth and Ludgershall paper includes a settlement profile which covers this and other infrastructure at the towns. The provision of GP services is considered to be reasonable, while the vacant surgery is considered to be an opportunity. Similarly, the defined town centres in the two towns are opportunities in terms of retail provision and regeneration to provide commercial uses to meet local demands.

8 Amesbury Event specific questions – 21/01/21

During the event, multiple questions were asked about the following topics, which are answered under the 'Common themes' in **Section 2**.

- Timescale of the Plan and extending the Plan period 2.1
- Chief Planner advice 2.1

Further questions, specific to Amesbury are as follows:

Q1. Will earlier projects such as the Amesbury Market Town Partnership's Amesbury Community Strategic Plan inform the new Local Plan?

A1. Yes, the Amesbury Market Town Partnership, 'Amesbury: Community Strategic Plan 2006-2016' forms part of the evidence base and so will be used as relevant to inform the Local Plan Review process.

9 Malmesbury Event specific questions – 21/01/21

During the event, multiple questions were asked about the following topics, which are answered under the 'Common themes' in **Section 2**.

- How housing and employment needs are calculated 2.2, 2.9
- Place-shaping priorities 2.3
- How site assessments were conducted and whether new sites are still being considered? 2.3
- How the Local Plan will sit alongside Neighbourhood Plans 2.4
- Existing/new infrastructure e.g. doctor's surgeries, schools 2.5
- Sustainable transport and transport modelling 2.7
- Planning for changes to the way people work and travel 2.7
- 5 Year housing land supply 2.8

Further questions, specific to Malmesbury are as follows:

Q1. Why are sites being proposed at Malmesbury when the town has already delivered its share of homes set out in the strategy?

A1. The consultation suggests a pool of sites for development. Development is not solely about new homes. Other uses may need to be accommodated on greenfield sites.

Thinking about where development can or cannot take place, is also a factor that should influence a decision on an appropriate scale of growth. The suggested scale of growth is lower than the current plan because of constraints around the town. It is appropriate to consider if that judgement is born out. A pool of greenfield sites frames the discussion.

Q2. Will the most up to date position for the land at Hullavington airfield be considered within this review - with Dyson's change of economic plans in mind?

A2. Hullavington is designated as a Large Village in the Wiltshire Core Strategy. The consultation does not suggest we change the designation and the 'Empowering Rural Communities' document suggests a housing requirement of an additional 80 dwelllings over the plan period (2016-2036). This has almost entirely been met already. The consultation does not include separate consideration of Hullavington Airfield.

Q3. Will each site be considered on its own merits rather than as a wider site, owned by a different person?

A3. Some land parcels provided to us by different landowners have been combined. Land ownerships aren't necessarily the most logical or appropriate boundaries to a development. A site may combine land ownerships into one site so there is a comprehensive basis on which to appraise land and prepare the plan. More detailed investigation may suggest none, part or all of a site to be suitable for development.

Q4. What happened to developer contribution of a new school?

A4. Land was reserved in 2015 for a new school, as a part of planning permission for the residential development at Filands. More recent forecasts of pupil numbers at Malmesbury no longer justify a school. Under the legal agreement that reserved the site, the safeguard is removed, and the land reverts unencumbered to the owner.

Q5. What can be done to enhance the setting and rejuvenate the town centre?

A5. The Local Plan Review will provide a strategic framework for more detailed work. The plan will continue to safeguard areas important to the town's setting in order to prevent harmful development. More detailed measures may be outside of planning control or would

be detailed design elements of the neighbourhood plan. A draft place shaping priority refers to town centre regeneration. Views are invited on how this could be improved, for example to reference particular outcomes. A Town Centre and Retail Study for the County has been carried out and this will help to inform more detailed policies and proposals either as part of the Local Plan Review or a review of the neighbourhood plan.

Q6. A full site assessment of sites was conducted within the Neighbourhood Plan consultation. Why has this information not been used in your current site selection as some of the sites mentioned have constraints?

A6. The pool of potential development sites represents an initial stage in the plan preparation process. It represents a first stage of sifting of sites carried out on a consistent transparent basis across the County and a single evidence base. Further work may be taken forward as a review of the Neighbourhood Plan. Consultation responses will inform what sites, if any, may go forward. Further work would take up the more detailed site assessment of sites conducted as part of the Neighbourhood Plan.

10 Bradford-on-Avon Event Specific Questions 25/01/2021

During the event, multiple questions were asked about the following topics, which are answered under the 'Common themes' in **Section 2**.

- Consultation timeline 2.1
- Altering households to contribute to housing numbers 2.2
- Defining sustainable growth and whether a number-based approach be sustainable?
 2.2
- Affordable homes 2.2
- Whether more sites can be added 2.2
- Prioritising brownfield land and improving existing buildings over greenfield land 2.2
- Calculating housing numbers and housing needs 2.2
- Site exclusion criteria 2.3
- Time allowed to commence building once granted planning permission 2.3
- Public health and planning decisions 2.3
- Self-build housing requirements 2.3
- Holistic approach to place-shaping 2.3
- Site assessments 2.3
- Planning for different land uses, other than housing 2.3
- Biodiversity and site selection 2.3, 2.6
- Neighbourhood Planning 2.4
- Supporting infrastructure e.g. schools, doctors' surgeries 2.5
- Carbon zero homes and policies 2.6
- Flood management 2.6
- Access to green space and increasing green spaces 2.6
- Protecting habitats and wildlife on sites 2.6
- Habitats Regulation Assessment 2.6
- Transport modelling and sustainable transport 2.7

- Ensuring houses promised are built 2.8
- Utilising vacant retail space 2.10
- Housing design 2.11
- Incorporating liveability into new developments 2.11
- Consideration towards the change in the way we live in our homes 2.11
- Consultation timing and format 2.12

Further questions, specific to Bradford on Avon are as follows:

Q1. The Neighbourhood Plan makes reference to housing requirements as being the right houses in the right places but how can we avoid more anywhere housing as promoted by the housing developers?

A1. The Neighbourhood Plan identifies areas of opportunity which may yield some housing, so the town council should review these as part of the Neighbourhood Plan review and see what can be done to bring these sites forward. The Local Plan must look up to 2036 which is ten years beyond 2026, the Neighbourhood Plan end date. In reality there are only a few sites that may provide additional houses as shown in the Site Selection Paper. Additional more detailed appraisals will be undertaken to see if they are appropriate.

Q2. The Local Bradford on Avon Neighbourhood plan excluded some sites; however these sites have now been sifted to be included these very sites. Therefore what was the purpose of the Neighbourhood plan? Why are the approved Neighbourhood Plan areas of opportunity not included, but additional inappropriate and unpopular sites listed?

A2. The Local Plan Review looks to 2036 which is ten years beyond 2026, the Neighbourhood Plan end date. In reality there are only a few sites that may provide additional houses as shown in the Site Selection Paper. Additional more detailed appraisals will be undertaken to see if they are appropriate. The areas of opportunity are within the settlement boundary of the town where the Wilshire Core Strategy supports development in principle, so the Local Plan Review is not going to include these. The Neighbourhood Plan review, undertaken in parallel with the Local Plan Review, can identify a delivery strategy for the areas of opportunity to accommodate a proportion of the town's proposed indicative housing requirement up to 2036 (80 dwellings).

Q3. Is there no way to consider making the Golf Course a nature reserve or public green space? Where can we raise our wildlife concerns? What protection is in place for the otters in the Avon near the Golf Course?

A3. Local Green Spaces can be identified by neighbourhood plans but have to meet the tests set out in national planning policy. Further site appraisals undertaken by the Council will provide evidence as to whether the Golf Course site is suitable for residential development or not.

Q4. Please clarify what weight will be given to the Green Blue infrastructure network that includes the Golf course, particularly given that the green corridor was given priority in the BoA Neighbourhood Plan? Why is this consultation being carried out before the Green/Blue strategy is published?

A4. Balancing housing needs against protection of green infrastructure, and the ability of development to contribute to a green infrastructure network are matters that will continue to inform the site selection process. The neighbourhood planning process can provide evidence of how the areas of opportunity could provide additional housing. This could advance sites which may perform better in planning terms to meet the towns indicative housing requirement in the local plan.

Q5. As the Golf Course is historically landfill, isn't this contaminated and unsuitable for housing? What mitigation strategies would be put in place?

A5. Further site appraisals undertaken by the Council will provide evidence as to whether the Golf Course site is suitable for residential development or not, and what mitigation may need to be put in place.

Q6. With the heightened awareness of ecological issues, and the importance of green space, it surely should be a top priority to acquire the golf course for the town? It would complete the green ring around Bradford-on-Avon and would be a golden opportunity to create a woodland, a track for mobility scooters, wildflower meadows and a community orchard. What consideration is given to the fact the Golf Course is so valuable to the local community?

A6. Local Green Spaces can be identified by neighbourhood plans to ensure that a site continues to fulfil this role, but a designation would have to meet the tests set out in national planning policy. There are limited options for site acquisition unless the town council engages with the landowner and agrees a price for asset transfer.

Q7. How has the Golf Course been identified as a potential site when it is so close to the flood plain?

A7. Proximity to a flood plain does not rule a site out. The site is elevated and is not wholly covered by the flood zone.

Q8. Has access been assessed as there are issues with both the Golf Course and the Allotments?

A8. Access forms part of the next round of site appraisals.

Q9. A mitigation for potentially losing allotment land is to allocate greenbelt to relocate the allotments. What would protect that from becoming future development land in itself if allotments are proposed for development now?

A9. Green belt land is protected by national planning policy.

Q10. Why are you considering these 3 housing sites, all of which have problems, rather than looking at Brownfield sites within the town for example garage courts?

A10. The consultation is considering the difficult and controversial decisions of where urban areas need to expand, if this is necessary, and therefore doing so as early in the process as possible. In addition to further work preparing the Plan, a Neighbourhood Plan review could provide further evidence on brownfield locations and development opportunities, which would remove or reduce the need for greenfield sites.

Q11. Where are the potential brown field sites in BOA?

A11. The Brownfield Land Register and Neighbourhood Plan identifies known potential sites. Many sites, however, are 'windfall' sites which by their nature are impossible to identify at the plan making stage and will nevertheless contribute to meeting brownfield targets at main settlements.

Q12. How can local residents have a say in not just where the houses are, but what type of housing is built, ensuring sustainable environmental standards?

A12. The neighbourhood plan can add non-strategic policies to the development plan which will apply in its entirety to new proposals for housing. The Neighbourhood Plan review should sail closely to the local plan review so the town council can see if proposed policies in the Local Plan Review will deliver what local people want, or if additional detail should be set out in the Neighbourhood Plan policies.

Q13. What role did road space provision play in devising planning housing need for BoA?

A13. None. Housing numbers were derived based on parameters set out in the Alternative Development Strategy Paper. High level information in terms of transport and accessibility informed that process amongst other factors.

Q14. Where is the vision for the town? How can other considerations be added to the place-shaping priorities?

A14. Please make a representation to say why you think a vision is needed; what it could entail; and what additional priorities you find important and haven't been included yet.

Q15. Can other proposals such as cycle links from adjacent villages be shown in this BOA plan?

A15. The Local Plan is a strategic plan and would have to provide this information at all settlements for consistency. It may be better placed in the Neighbourhood Plan.

Q16. Are there plans for an alternative River crossing as no development on the south-east side of town will improve air quality without one?

Q17. What strategies would be used to mitigate the extra traffic travelling westbound through the town centre?

Q18. It seems the traffic through Bradford on Avon is from Trowbridge towards Bath or Bath to Trowbridge are any other traffic strategies being considered to bypass the centre of BoA (or reduce traffic through BoA) if so, where would they appear?

A16, A17, A18. Bradford on Avon will be considered in the next round of assessment, which will consider development impacts and mitigation strategies for each of the Market Towns, before refreshing the Countywide strategy. Any mitigation for Bradford On Avon in the Local Plan will need to be commensurate with the scale of forecast development, in accordance with the National Planning Policy Framework, however existing constraints to development would need to be resolved and these may be further considered within the Local Transport Plan.

Q19. How can Wiltshire Council justify how estates such as The Kingston Farm and Tithecote meet the place-shaping priorities? Particularly in reference to design and

affordability? Why were the presence of bats not considered on the Kingston Farm and Bellway sites?

A19. The place shaping priorities are new and the Kingston Farm proposal was approved under the Wiltshire Core Strategy provisions. The Kingston Farm and Bellway sites were subject to ecological assessments.

Q20. What can we do collectively to ensure any housing that might be developed is truly affordable and sustainable? How we can we encourage our young people to remain and be involved in the town community and dedicate some affordable solutions to them?

A21. Viability Assessment will show what level of affordable housing can be set for development. The Neighbourhood Plan can identify products or schemes that would deliver this in conjunction with market housing, and the involvement of Registered Social Landlords – for example on the Areas of Opportunity.

Q22. Where do Stone Circle Housing sit within the review to help the push the social/council housing agenda? This type of housing provider has the best opportunity and motive to provide environmentally and socially responsible housing

A22. Stone Circle Development Company has been set up to deliver market housing for sale. Therefore, it is not intended that Stone Circle will help push the Social or Council Housing agenda.

However, Wiltshire Council has a dedicated Residential Development Team who will be delivering new council housing in Wiltshire. The team is tasked with delivering 1000 new affordable homes over the coming 10 years, including growing the affordable housing stock across the County.

The team will be aiming to deliver 100 homes per year, all new builds will be built to zero carbon standards; all electric homes, with PV panels and designed taking a fabric first approach. The team are also piloting 19 units of accommodation through an off-site manufacturer offering further environmental benefits.

As well as the Residential Development Team the Council also employ dedicated Community Led Housing Project Managers to work closely with communities to bring forward further affordable housing opportunities.

Q23. Provision of town-centre housing (that located within a flat, easy walk of the main town centre facilities) would be welcomed by the community. Why is none of the suggested sites in the town centre?

A23. The neighbourhood plan can add non-strategic policies to the development plan which will apply in its entirety to new proposals for housing. A review should sail closely to the local plan review so the town council can see if proposed policies in the Local Plan Review will deliver what local people want, or if additional detail should be set out in Neighbourhood Plan policies.

Q24. What does 80 homes equate to in terms of population?

A24. The 2017 Strategic Housing Market Assessment discusses the ratio between population and households (household representative rates). The population and household projections that the housing growth are based on indicate on average 2.19 persons per household for Wiltshire. On that basis 80 homes equates to 176 people.

Q25. Where is the football site mentioned in the recent proposals?

A25. The football site is not mentioned in the Settlement evidence papers because it is a site identified in the Neighbourhood Plan so the development plan already refers to it as an area of opportunity. The review of the Neighbourhood Plan could re-examine this site in terms of deliverability.

Q26. It is essential the Neighbourhood Planning team at Wiltshire Council proactively engages with those parish councils which have not yet brought forward NPs to provide advice and guidance from the outset. Affordability is a key point given the ever-increasing pressure on house prices in the wider BoA area and it would be good to see community-led housing become more prominent in these discussions.

A26. The Housing Team at Wiltshire Council routinely engages with and provides advice to neighbourhood planning groups on community led housing, but that process has to be initiated by local parishes and neighbourhood plan steering groups. Viability Assessment will show what level of affordable housing can be set for development. Neighbourhood Plans can identify products or schemes that would deliver this in conjunction with or without market housing, and with the involvement of Registered Social Landlords

11 Marlborough Event Specific Questions 25/01/2021

During the event, multiple questions were asked about the following topics, which are answered under the 'Common themes' in **Section 2.**

- Scale of Growth 2.2
- Neighbourhood Planning 2.4
- Carbon neutral houses 2.6

Further questions, specific to Marlborough are as follows:

- Q1. Marlborough's geography means there are key pinch points for access. What support might be available to deal with these in the event of growth?
- Q2. How will the impact of development in Marlborough be measured, where there is considerable problems with traffic and pollution?
- Q3. More traffic will require considerable development to get more traffic through small, constrained junctions e.g. Salisbury Rd/London Rd. Who would pay for this?
- A1, A2, A3. When preparing the Local Plan and assessing sites we involve transport colleagues to assist when making judgements against sites. Further work, assessing sites from a transport perspective, will be undertaken prior to the allocation of any sites.

The Planning for Marlborough document includes a Settlement Profile which summarises the measures in place or being put in place to address known infrastructure issues and their timing, what additional provision would be needed to support growth and what other opportunities there may be. This includes transport. An Infrastructure Delivery Plan will be prepared to explain the costs and funding mechanisms for new infrastructure. We invite your views on the measures outlined.

Q4. Marlborough has a pollution problem - Herd St, the High St - what weight does this carry when determining scope for growth?

A4. The Local Plan Review recognises that air quality is a significant concern at Marlborough and when preparing proposals for the Local Plan, colleagues are consulted on what issues may arise. The Planning for Marlborough paper includes a Settlement Profile which summarises the measures in place or being put in place to address the known infrastructure issues and their timing, what additional provision would be needed to support growth and what other opportunities there may be. The Air Quality Management Area present at Marlborough is identified in the transport summary. An opportunity identified is that improvements to A346/A4 may improve congestion hot spots. This provides an example of how development may help to improve air quality in the area. We invite your views on the measures outlined.

Q5. Have you analysed the draft Neighbourhood Plan and will you take that as detailed input or do you require separate comments based on the NP's content?

A5. Given Wiltshire Council is a consultee as part of the Regulation 14 consultation process (being undertaken by Marlborough Area Neighbourhood Plan steering group from 18 January to 8 March 2021) we will analyse and provide feedback on the Neighbourhood Plan in due course.

Separate from the Regulation 14 process being undertaken by the steering group, Wiltshire Council will continue to work closely with the steering group, advising and supporting them where necessary. For anyone engaging with the Neighbourhood Plan regulation 14 consultation, separate comments will need to be submitted to the Local Plan consultation for them to be considered by Wiltshire Council.

Q6. Does the Wiltshire plan take precedence over the Marlborough Neighbourhood plan, so that in cases of dispute the Neighbourhood Plan proposals could be overruled?

A6. The Wiltshire Local Plan will set the strategic context and planning policies for neighbourhood plans. The Neighbourhood Plan should be in general conformity with the Local Plan Review. For example, it might be that the Local Plan will set the strategic level of growth for the town with the Neighbourhood Plan then identifying how that growth is met by identifying sites.

Q7. How is it proposed to plan for houses that are truly affordable? Will the Neighbourhood Plan be able to locate for the use of Community Land Trusts and Self build?

A7. There is already an adopted planning policy requiring either 30 or 40% affordable housing provision on sites of 10+ dwellings. A similar policy will be included in the Local Plan Review to ensure the delivery of affordable homes is maintained. The Neighbourhood Pan

will be able to allocate sites, including for delivery by Community Land Trusts and Self Build. The local plan review process will also consider whether policies are required to ensure self-build homes can be delivered as part of the dwelling mix when meeting housing need. We invite your views on this.

Q8. If the 245 New Homes are to be built by 2026 when do you envisage the first of these areas being developed? Will it be one or all of the sites?

A8. The Local Plan being prepared is for the period 2016-2036 so it is not envisaged allocated sites will have to be built by 2026. The Local Development Scheme outlines the anticipated timescale for the adoption of the Local Plan to fall at approximately Quarter 2 2023. It might be, if sites are allocated through the neighbourhood plan, sites will achieve 'allocated' status upon the adoption of the Marlborough Area Neighbourhood Plan. Information on delivery of sites will be discussed at a later stage.

In terms of sites, we are at an early stage in the process and we need to hear your views on the overall scale of growth and where this growth is best placed at Marlborough. This may be all or part of a certain site(s). The sites identified are 'potential development sites' at this stage. It is not envisaged that all of the sites will need allocating, only those required to meet the identified housing need at the town will be allocated.

Q9. Given spatial planning dept advised that the housing need for Marlborough was at the lower end of the estimated range (50 homes) last summer, what compelling evidence has come forward in 6 months to suggest 250 homes will now be required?

A9. As explained in the Planning for Marlborough Report, the level of growth represents the highest tested distribution for new homes at Marlborough. This distribution has been chosen solely to enable the Marlborough Area Neighbourhood Plan steering group to deliver the affordable homes their work has indicated are required as a priority for the settlement. This level of growth does however represent a challenge given Marlborough sits within a constrained location compared to the wider Housing Market Area. Delivering this growth will require careful balancing against the need to protect the attractive qualities of the wider Area of Outstanding Natural Beauty. Views are invited on the suitability of this level of growth.

Q10. Why is land behind College Fields and Barton Park included in your development proposals when a) it is in an AONB and B) Preshute parish council who have responsibility for this land withdrawn from the Marlborough Neighbourhood Plan because they recognise development on this land unsuitable?

A10. The sites published as part of this consultation form a suite of potential development sites. All have constraints to varying degrees and we are consulting on the suitability of a site(s) to accommodate the housing need at Marlborough. It is worth noting that Marlborough sits within the North Wessex Downs Area of Outstanding Natural Beauty and as such, all proposed sites sit within this designation. Given the Local Plan consultation is separate to the Neighbourhood Plan consultation, we would encourage your views on the suitability of the potential development sites to be shared as part of this Local Plan consultation.

Q11. With 280 houses with pp 160 brownfield, plus 245 in Local plan totalling 685. Where will all new people work? will this lead to mass commuting and what effect will this have on climate change? Where is the balance of jobs and homes you mentioned?

A11. Balancing the need for new homes and employment forms a key element of the Local Plan review process. Where employment need is concerned, we would encourage you to view the Employment Land Review that supports this consultation (under supporting document).

It is acknowledged that work and travel patterns may change in the medium and long term following the change in working patterns we have all experienced over the past year. The aim of the Local Plan is to strike a balance between housing and employment, reduce the need to travel by private car and encourage sustainable modes of transport to reduce negative environmental impacts. We invite view on what the correct balance might be.

Q12. The Local Plan proposes no employment land in Marlborough. Where is the balance?

A12. As explained in the Planning for Marlborough Report, based on current evidence, further employment land is not needed at Marlborough. Employment land supply has been reviewed and the existing supply is available and capable of meeting the needs. Views are invited as part of this consultation.

Q13. Where would the access points to the sites be? E.g. land owned by the College behind Barton Park and College Fields.:

A13. Access points to the sites haven't been decided at this stage.

Q14. Will you require new housing to be carbon neutral?

A14. What we can do as part of achieving carbon neutrality, including construction techniques to assist in reaching this target, is an important element of this consultation. An 'Addressing Climate Change and Biodiversity' paper is being consulted upon as part of the Local Plan Review consultation that asks these questions. We would encourage you to view this document and submit your views.

Q15. The Marlborough Neighbourhood Plan specifically excludes further development of over 55s and retirement homes. Does the Wiltshire plan also have this restriction, or would a developer be able to get around it by including a number of affordable homes?

A15. The current Wiltshire Core Strategy includes two policies called 'Meeting Wiltshire's Housing Needs' and 'Meeting the Needs of Wiltshire's Vulnerable and Older People' and will be retained in some form in the new Local Plan.

Once made, a neighbourhood plan becomes part of the adopted development plan and any policies within it carry weight in decision making. We would encourage you to comment on the neighbourhood plan as part of that separate consultation and also submit views on what you think the Local Plan should do to accommodate retirement dwellings as part of this Local Plan consultation.

Q16. What improvements in local health service provision have Wiltshire Council planned for Marlborough to take account of the projected population growth?

A16. As part of the Local Plan review process the views of healthcare providers are sought and considered feeding into any Local Plan proposals. This will help to inform us with regards the service provision, both existing and required.

The Planning for Marlborough paper includes a Settlement Profile, which summarises measures in place or being put in place to address known infrastructure issues and their timing, what additional provision would be needed to support growth and what other opportunities there may be. This includes for GP provision. We invite your views on the information outlined.

12 Westbury Event Specific Questions 26/01/2021

During the event, multiple questions were asked about the following topics, which are answered under the 'Common themes' in **Section 2**.

- Putting forward alternative sites 2.3
- Neighbourhood planning and design 2.4
- Definition of the town centre 2.10
- Housing design policies or guide 2.11

Further questions, specific to Westbury are as follows:

- Q1. All the proposed allocations are in/around Westburty itself. What housing numbers are proposed outside the town and how/where will allocations be made?
- Q2. Given the size and sustainability of Dilton Marsh, why are no allocations proposed or sites identified for further assessment?
- A1, A2. The Local Plan Review sets the strategic context for development in Wiltshire and, therefore, focuses on growth on the main settlements, including market towns like Westbury. The Empowering Rural Communities document explains the policy approach to rural areas and includes indicative housing requirements for Large Villages over the plan period (2016-2036). It is envisaged that local communities will play a greater role in allocating sites for development in rural areas through the neighbourhood planning process.
- Q3. Given that the A350 adversely affects the health and wellbeing of every Westbury resident how can any new housing be proposed until a bypass is built?
- Q4. To put the horse before the cart, wouldn't the question of where the bypass should go be decided first?
- Q5. Will a (Westbury) bypass route be included in the new plan?
- A3, A4, A5. The Local Plan Review recognises that air quality and traffic congestion on the A350 is a significant concern in Westbury. It will be considering how development can address these issues. However, to be included in the plan, any option for a bypass must be

shown to be deliverable. Hence, why the Planning Inspector examining the Wiltshire Core Strategy concluded there was no justification for continuing to save Policy T1a from the West Wiltshire District Plan; the scheme was not part of a capital programme and no funding bids were in place or intended. However, he judged that Core Policy 66, Strategic Transport Network, effectively replaced this policy and facilitated the improvement of the A350 to support growth at Westbury. He also considered that the Local Plan Review would be another mechanism to include transport infrastructure projects that may reasonably emerge during the plan period. The Council is looking at measures along the A350 corridor right through to Chippenham and exploring options for Government funding to bring forward a package of interventions where appropriate to do so. For example, improvements are planned at Yarn Brook to help alleviate some of the traffic that backs up on the A350 there. It is not possible to provide a definite answer at this stage as to whether a bypass will be built. However, this consultation is the right means to raise this issue and there will be further discussions with transport and other colleagues about how such a scheme could be delivered for Westbury.

Q6. Will agreed infrastructure items such as the bridge over the railway be completed before any further building is undertaken? Building anything and not looking at more basic issues is inappropriate.

A6. It remains an aspiration to deliver a bridge over the railway coming off Mane Way and, thereby, providing greater connectivity with the Land at Station Road strategic allocation and helping to relieve congestion along Oldfield Road. Some of the challenges to overcome include working with the strategic rail authority to ensure a bridge is safe and bridging the funding gap between already accrued section 106 contributions from the strategic allocation and previous development and the total cost of the scheme (estimated at around £5m).

Q7. How can you talk about improvement of air quality and be looking at building an incinerator in the town?

A7. The Local Plan Review recognises that air quality is a significant concern in Westbury. A traffic related Air Quality Management Area (AQMA) has been designated on the A350 in the centre of Westbury. One of the place shaping principles is that development should contribute towards the improvement of air quality and support the AQMA in Westbury town centre. The planning application (20/06775/WCM) submitted by Northacre Renewable Energy Limited for an energy from waste facility is currently pending a decision. Should planning permission be granted, the facility would be tightly controlled by the Environment Agency through their licensing powers.

Q8. Hawke Ridge Business Park has been actively marketed for employment without success over a sustained period for many years is there a case pursuant to paragraph 120 of the National Planning Policy Framework for releasing this site for residentialled housing development?

A8. The provisions of paragraph 120 are recognised. Views on the future of employment sites can be submitted to the consultation.

Q9. How can the Westbury Neighbourhood Plan be influential in shaping a locally responsive spatial strategy for all growth at Westbury? E.g. dispersed over smaller sites vs focused delivery on a larger master planned area...

- A9. The Westbury Neighbourhood Plan can be influential in shaping growth at Westbury, including in the following ways:
 - Place shaping priorities: These have been developed with the neighbourhood plan steering group. They will form the basis for developing planning policies and proposal for growth, including any allocations. Agreement between the Local Plan and the Neighbourhood Plan on these priorities will enable both plans to proceed from a common basis.
 - 2. Town master plan: Coordinating with the preparation of Westbury Town Council's town master plan will help to ensure that the neighbourhood plan reflects the aspirations and priorities of the town council and local people on the key issues for Westbury, including for example, the future of the town centre and links with the railway station.
 - 3. Cross boundary working: The neighbourhood plan can work with neighbouring parishes, such as Heywood and Dilton Marsh, and be influential in shaping growth across the wider community area. Much of the employment land at Westbury is in the parish of Heywood and, therefore, outside of the remit of the neighbourhood plan. However, close cooperation can ensure the development of comprehensive spatial strategy for all growth at Westbury.

Q10. The consultation document suggests a target for 90 dwellings on Brownfield land in Westbury. Can the council please expand on this approach for specifically the Westbury Town Neighbourhood Plan Area? How was 90 arrived at?

A10. Westbury's brownfield target represents the total number of additional new homes the Council estimate can be built on previously developed land over the next 10 years (2021-2031), not the whole plan period. This represents future anticipated delivery from brownfield sites which are not allocated in the development plan (in accordance with the National Planning Policy Framework). The brownfield target is derived from a 'windfall' allowance for Westbury used in the housing land supply. The 'windfall' allowance is calculated from a long-term (2009-2019) assessment of brownfield permissions which are not allocated in the development plan, and the rate at which such sites have been delivered within Westbury. Although, a minor contribution is made by small 'windfall' sites which tends to remain consistent over the years, large sites are more infrequent and can be much harder to predict.

Q11. Can the Neighbourhood Plan allocate sites other than brownfield to meet local needs and aspirations?

A11. Neighbourhood plans can allocate sites other than brownfield to meet local needs and aspirations. It will depend exactly on what the neighbourhood plan is looking to achieve through their neighbourhood planning process and evidence. For instance, they may have identified a need for affordable or specialist housing.

Q12. What type of businesses do the Council aim to attract to Westbury in relation to the skills within the workforce and what businesses have been attracted in the current plan period as Westbury appears to have lost out to Melksham and Chippenham in particular.

A12. The settlement profile in the Planning for Westbury paper gives context to the local economy in the town. For example, during the current plan period, increased investment has come from companies such as Welton Bibby and Baron, Arla Westbury Dairies and the Hills

Group at their Mechanical Biological Treatment plant. The settlement profile also indicates that there is some need for convenience and comparison retail investment in the town centre.

Q13. Is the Wellhead Valley protected from development?

A13. The Wellhead Valley is currently designated as a Special Landscape Area (SLA), which is a non-statutory landscape designation as defined by the local authority and protected under Saved Policy C3 of the West Wiltshire District Plan. As part of the Local Plan Review all saved policies are being reviewed.

Q14. You referenced the previous Core Strategy as having over-allocated employment land. Does the net additional amount of employment land now proposed (1ha. at Westbury) continue that over-provision as a matter of policy or does it, for example reduce the amount of over-provision?

A14. The modest amount of additional employment land proposed at Westbury (1 ha) recognises the already significant employment areas, such as the West Wilts Trading Estate, Northacre Industrial Park and Hawk Ridge Business Park. However, on current evidence, further employment land is needed at Westbury over and above land already allocated in the Local Plan (Core Strategy). This is supported by the historically high level of housing development in the town.

13 Salisbury Event Specific Questions 26/01/2021

During the event, multiple questions were asked about the following topics, which are answered under the 'Common themes' in **Section 2**.

- Timescale of the plan 2.1
- Supporting documents 2.1
- Consultation period 2.1
- Plan monitoring 2.1
- Scale of growth 2.2
- Impact of COVID-19 on housing allocations 2.3
- Process for submitting new sites 2.3
- Home for first-time buyers in villages 2.3
- Relationship between the Local Plan Review and neighbourhood planning 2.4
- Climate change and biodiversity 2.6
- Sustainable building design and layout 2.6
- River Avon Special Area of Conservation (SAC) and phosphate issue 2.6
- Climate change targets 2.6
- Transport and carbon reduction targets 2.7
- Car parks 2.7

Further questions, specific to Salisbury are as follows:

Q1. Do you intend to assess the effect of the pandemic on office and retail space requirements and hence, potentially, on additional brownfield site availability, additional to that envisaged in the Salisbury Central Area Framework?

A1. With time, evidence will allow the Council to understand better the effects of Covid-19 upon the economy and we will consider new evidence as it arises. The full effects may take a year or two to manifest. Changes in retail were already evident prior to spring 2020, although Covid restrictions may have accentuated this trend.

Q2. Could you add shared transport options to the Transport Review? There is a car club in Salisbury, and evidence that shared transport options such as this reduce car usage as well as land take for car parking.

A2. Car club expansion is included in the current Salisbury Transport Strategy and can be reflected in evidence being prepared for the Plan. The Council aims to introduce e-bike hire at the rail station as part of the Future High Streets project, with an aim to roll this out further. Further expansion of the car club or e-bikes will be subject to funding availability.

Q3. How is Wiltshire Council going to resolve the ongoing traffic issues caused by poor junctions and traffic flow on the A36 so that more housing within its vicinity doesn't add to these?

A3. Measures to overcome traffic issues include extending bus services, demand management and bus priority to increase P&R patronage, cycling and walking infrastructure improvements, and improved bus connections to the rail station. Site-specific measures and site design (such as type and layout of residential properties, connections to the cycle network, bus routes and travel plan measures) have a large influence on the success of the Salisbury Transport Strategy (see the Council's dedicated webpage), and are decided in greater detail at the planning application stage.

Q4. Has the development planned for the Netherhampton Road been consulted on or is that outside of the plan?

A4. Development planned for Netherhampton Road was consulted on and adopted as an allocation through the Wiltshire Housing Site Allocations Plan (WHSAP) https://www.wiltshire.gov.uk/planning-whsap and forms part of Salisbury's overall housing requirement in the Wiltshire Core Strategy (up to 2026). The Local Plan Review, upon which the Council is currently consulting, has a time horizon of 2036.

Q5. Could you expand on new roads re the Netherhampton Road plans for 740 dwellings?

A5. In order to be adopted as a sound development proposal, highways requirements were broadly agreed through the Wiltshire Housing Site Allocations Plan (WHSAP) https://www.wiltshire.gov.uk/planning-whsap Requirements for this scheme are currently being refined in greater detail via the planning application process.

Q6. Can you explain the reason why there was such a great change in the sustainability assessment on so many of the same criteria for proposed Site 1 (land to the North East of Old Sarum) between that done in February 2020 and that published in the consultation statement?

A6. The Sustainability Appraisals (SA) for the Wiltshire Housing Site Allocations Plan (WHSAP) and Local Plan Review (LPR) were undertaken at different times and were based on the evidence available at the time. We sought information from specialists within the Council and a judgement was made on the likely significance of effects of developing sites based on this information, local knowledge and the baseline situation outlined in the scoping report.

The way these judgements were made is set out in the annexes to the respective SA Reports for both plans (available via https://www.wiltshire.gov.uk/planning-policy). The SAs for both plans use different SA objectives and decision-aiding questions and different methodologies and therefore the SA results for both plans should not be compared. Also, the objectives and geographical scope of the WHSAP and LPR are different, which influences the SA results. The evaluation of the significance of likely effects is not an exact science and involves officer judgement based on any evidence available at the time. The official guidance on conducting SA has been followed.

Lastly, sites were assessed equally and transparently against the same criteria for WHSAP and LPR and in the same amount of detail. The evidence obtained from specialists also went into the same amount of detail for each site. This allowed comparisons to be made on the overall significance of effects for each site.

Q7. Comparing the sustainability appraisals of SHELAA sites done in the document published in February 2020 with that in the current SA document shows significant shifts (typically downwards) in the evaluated impacts of development. Why are the evaluations not consistent?

A7. The Sustainability Appraisals (SA) for the Wiltshire Housing Site Allocations Plan (WHSAP) and Local Plan Review (LPR) were undertaken at different times and were based on the evidence available at the time. We sought information from specialists within the Council and a judgement was made on the likely significance of effects of developing sites based on this information, local knowledge and the baseline situation outlined in the scoping report. The way these judgements were made is set out in the annexes to the respective SA Reports for both plans (available via https://www.wiltshire.gov.uk/planning-policy).

The SAs for both plans use different SA objectives and decision-aiding questions and different methodologies and therefore the SA results for both plans should not be compared. Also, the objectives and geographical scope of the WHSAP and LPR are different, which influences the SA results. The evaluation of the significance of likely effects is not an exact science and involves officer judgement based on any evidence available at the time. The official guidance on conducting SA has been followed.

Lastly, sites were assessed equally and transparently against the same criteria for WHSAP and LPR and in the same amount of detail. The evidence obtained from specialists also went into the same amount of detail for each site. This allowed comparisons to be made on the overall significance of effects for each site.

Q8. Isn't Site 1 in Laverstock & Ford and therefore not within the Salisbury boundary?

A8. Whilst Site 1 is within Laverstock & Ford parish area, the district of Old Sarum is considered to be part of Salisbury urban area. As individual settlements, both Ford and Laverstock are acknowledged within the Wiltshire Core Strategy as 'Small Villages'. This principle is being maintained for the Local Plan Review.

Q9. Laverstock and Ford Parish Council have supported two applications for Pharmacies at Old Sarum/ Longhedge that have both been rejected. However, the report for site 1 adjoining these existing sites describes them as "poorly connected to the City Centre". Are you able to influence this in any way?

A9. As the Interim Sustainability Appraisal (SA) states about Site

1 - https://www.wiltshire.gov.uk/planning-policy - the Council recognises that Old Sarum is, in general, rather poorly connected to the city centre. Owing to the community's size it cannot have the level of services available in Salisbury. Nevertheless, Old Sarum – including the recent Longhedge development – do possess basic local facilities, which prevents some unnecessary travel and promotes a relatively more sustainable level of consumption. The Council's Development Management team confirm that the only applications we've had have been for the Local Centre at Old Sarum, which has on the ground floor a space for a doctor's surgery – this was approved 10 years ago and built out - but the doctor's surgery space remains empty to this day.

To underpin the Local Plan Review, the Council will be seeking to ensure that urban transit from the Park & Ride to the city centre can be maximised, in terms of both frequency and local uptake.

Q10. What scientific risk analysis has the Site 6 assessment been based upon? The water-levels near the river in Site 6 are already high in winter and regularly pond. With additional concrete and housing development in the area nearest to the A338 the fields there are major concerns that the ground will be unable to absorb the additional water. This is before you consider climate change and wetter winters. Finally, if the Council decides to proceed anyway, what mitigation measures will be put into place to defend existing (and new) homes from flooding and ensure that they remain insurable and safe?

A10. Prospective locations for development undergo a rigorous process of site-selection. Site 6 is deemed a preferred location at Salisbury, which means that it has also come through an environmental and socio-economic assessment known as sustainability appraisal (SA, available via https://www.wiltshire.gov.uk/planning-policy). As part of mitigation for any development SA recognises that, at Site 6, surface water drainage systems would need to be integrated. Advice provided by the Environment Agency (EA) through the current consultation will help to arrive at an understanding of the likely impacts of development upon flood risk, notably given that an area of flood-risk sits just to the north of Site 6. Local modelling by the EA will also incorporate the latest projections of supplementary effects considered likely as a result of climate change.

Q11. Sites 6 and 7 take development almost to the edge of Britford. How does ensure this Britford is kept separate and distinct from Salisbury?

A11. Sites 6 and 7, if developed, would bring the urban edge of Salisbury to approximately half a kilometre relative to the settlement of Britford. Site 6 is marginally the closer of the two. A landscaped buffer would be planned for the eastern margins of both Sites 6 and 7. Both margins would incorporate appropriate planting to facilitate rural transition and underpin separation between settlements.

Q12. Are you genuinely intending to set aside land for self-build? Surely big developers already have options on the three main sites?

A12. It is recognised that custom and self-build housing can enhance new development by virtue of improving and diversifying local design quality. This concept is increasingly being recognised by government as key to good place-making. The Council will be looking to encourage custom and self-build as a key component of all new housing brought forward on major sites across Wiltshire.

Q13. Will the Churchfields review include an improvement to the recycling centre which is very poorly sited?

A13. Churchfields is identified within Core Policy 20 of the Wiltshire Core Strategy. As a strategic allocation it can only be reviewed through the Local Plan. This principle is already recognised in the Central Area Framework for Salisbury (available via https://www.wiltshire.gov.uk/salisbury-future). Waste sites, such as the one at Churchfields, are safeguarded by Policy WCS4 of the Waste Core Strategy (available via https://www.wiltshire.gov.uk/planning-policy).

While the existing Salisbury Household Recycling Centre (HRC) site may not be ideal, a suitable alternative site would need to be found and Wiltshire Council, in its capacity as both Waste Disposal Authority (provider of HRC sites) and Waste Planning Authority, is best-placed to address this.

While the review of the Waste Local Plan will inevitably take time, the relocation of a HRC does not necessarily need to wait for new policy to be in place, given the planning policy framework that exists at national and local level.

Q14. Is Churchfields Industrial estate still planned to be retained as an industrial area or will it be changed to a more residential area?

A14. The Wiltshire Core Strategy identifies land for strategic growth at Salisbury (and Wilton). This includes Churchfields (1,100 dwellings and 5 ha employment land). The Wiltshire Housing Site Allocations Plan (adopted February 2020, available via https://www.wiltshire.gov.uk/planning-policy) recognised that Churchfields would not be delivered in the plan period to 2026 and therefore allocated new sites at Salisbury to help compensate for this fact.

Strategic policy for Churchfields Industrial Estate will seek to address the issue of future uses through the Local Plan Review, a draft version of which is anticipated for the end of 2021.

Q15. Having now decided that Churchfields will continue as the main commercial centre for Salisbury, will a long-term plan for the development and improvement of Churchfields be part of the Local Plan through to 2036?

A15. It is recognised that Churchfields Industrial Estate will continue to have an important role in the ongoing economic prosperity of Salisbury. Its location close to the railway station, with services to London and the West of England, makes it an attractive location for business and enterprise. Moreover, the Council, via the government's Future High Streets Fund initiative, intends to improve connectivity and the linkages between this part of Salisbury and the city centre.

Strategic policy for Churchfields will seek to address the issue of future uses through the Local Plan Review, a draft version of which is anticipated for the end of 2021.

Q16. What is planned for the Churchfields Industrial Estate to relocate the HRC and HGV Weigh Station to reduce heavy traffic through the Conservation Area?

A16. Churchfields is identified within Core Policy 20 of the Wiltshire Core Strategy. As a strategic allocation it can only be reviewed through the Local Pan. This principle is already recognised in the Central Area Framework for Salisbury (available via https://www.wiltshire.gov.uk/salisbury-future). Waste sites, such as the one at Churchfields, are safeguarded by Policy WCS4 of the Waste Core Strategy (available via https://www.wiltshire.gov.uk/planning-policy).

While the existing Salisbury Household Recycling Centre (HRC) site may not be ideal, a suitable alternative site would need to be found and Wiltshire Council, in its capacity as both Waste Disposal Authority (provider of HRC sites) and Waste Planning Authority, is best placed to address this.

While the review of the Waste Local Plan will inevitably take time, the relocation of a HRC does not necessarily need to wait for new policy to be in place, given the planning policy framework that exists at national and local level.

As regards the harmful effects of HGV traffic on the conservation area this is a matter that the Council is aware of. Strategic policy for Churchfields Industrial Estate will seek to address this issue through the Local Plan Review, a draft version of which is anticipated for the end of 2021.

Q17. Please could you give more information on what process is going on to see if Churchfields might be used for housing in this plan?

A17. The Wiltshire Core Strategy identifies land for strategic growth at Salisbury (and Wilton). This includes Churchfields (1,100 dwellings and 5 ha employment land). The Wiltshire Housing Site Allocations Plan (adopted February 2020 and available via https://www.wiltshire.gov.uk/planning-policy) recognised that Churchfields would not be delivered in the plan period to 2026 and therefore allocated new sites at Salisbury to help compensate for this fact.

Strategic policy for Churchfields Industrial Estate will seek to address the issue of future uses through the Local Plan Review, a draft version of which is anticipated for the end of 2021.

Q18. Why have you ruled out a new settlement at Porton, where jobs are being created?

A18. The option of a new settlement in the broad area between Salisbury, Porton and Amesbury is to be signposted in the Local Plan Review as important to the longer-term development of South Wiltshire. A more exact location for a new settlement would need to be identified and, for the purposes of the Local Plan Review, it has been considered that the promotion, coordination and investment required to realise such a complex project could not realistically be achieved within a time horizon up to 2036.

The Council acknowledges the job-creation prospects of the Porton Science Park cluster and is mindful that this needs to be sustainably integrated into future plans.

Q19. It will be critical to clearly identify the current and future brownfield capacity in the city before committing to greenfield sites. How is WC considering the existing redundant office spaces and the fact that WC has over provided specialist leasehold elderly housing already in the city?

A19. The Local Plan Review, preferred strategy, proposes a target for brownfield housing in Salisbury of 410 homes in the decade between 2021 and 2031. This figure is based upon past completion rates within the city's urban area. Beyond strategic regeneration opportunities such as the Maltings / Central Car Park, the brownfield target is a recommendation that the Salisbury Neighbourhood Plan might seek to achieve. The need for elderly accommodation in Salisbury, as with elsewhere across the UK is undiminished. In the years 2016-2036 the older population is expected to increase by 23% in the 60-74 demographic segment, and 81% in the 75+ age group.

As regards office space, the demand for suitable employment locations in or close to the city centre remains, and both the Local Plan Review and Neighbourhood Plan for Salisbury will be mindful of this. Against this, the government has made provision such that offices (and other uses) may be converted to housing; the Council will be monitoring take-up with respect to this provision, to test the effect that it is having upon urban centres such as Salisbury.

Q20. Do you think the city has enough specialist housing for the elderly?

A20. In the years 2016-2036 the older population in Salisbury is expected to increase by 23% in the 60-74 age group, and 81% in the 75+ age group. This clearly creates a need for specific types of suitable housing to meet these groups' needs.

As a result, there is likely to be value in diversifying the city's current terraced and semidetached offering with the provision of more bungalows, flats and detached homes in order to widen choice and ensure age-appropriate options are available in anticipation of a likely continuation of the ageing of the population.

Q21. What confidence is there in the economic future of Salisbury as a vibrant city without a university and with a declining employment and retail base?

A21. The Council has in place a Central Area Framework for the city (available via https://www.wiltshire.gov.uk/salisbury-future) that makes recommendations regarding the kind of strategies that will underpin Salisbury's economic resilience over the next few years. The measures are being implemented through initiatives such as the Future High Streets Fund, the Local Plan Review and Neighbourhood Plan (Salisbury City Council). Physical improvements such as development, infrastructure, public realm and greenspace will collectively aim to raise the city's profile and performance as a visitor economy destination. Such initiatives assume even greater significance in the context of the post-Covid 19 recovery.

As regards further education, it should be noted that the District Hospital has published its intention to optimise operations and expand to provide University-level health sector education (available via HEAT Project Salisbury – Health, Education and Technology (HEAT) Project Salisbury). This will complement wider sub-regional growth, notably at Porton Science Park, in opportunities linked especially to the life sciences sector. In sum, these initiatives mean that Salisbury ought to have every confidence in its ongoing economic resilience and prosperity.

Q22. Will Salt Lane and Brown Street car parks be developed for housing - pref. affordable?

A22. The removal of short-stay parking from these locations is in line with the Salisbury Transport Strategy. The Council aims to move short-stay parking to the edge of the city centre (excluding disabled parking). The Council also aims to reduce residential car parking in the city centre through expansion of the car club and other measures.

As regards redevelopment of Brown Street, it is essential that a pedestrian link be retained through the car park. It is also possible that some disabled car parking might need to be relocated here but this would be subject to a wider review of parking requirements.

Q23. You have told us about the plans for 900+ houses. When will the other locations for the other 4,000 houses be decided?

A23. The other, approximately, 4,000 homes across the Salisbury urban area:

- have been completed (up to 2019);
- are under construction;
- have planning consent; or
- are on land allocated in the authority's development plans.

In this sense the locations for development have already been decided, meaning that decision-making within the Local Plan Review just needs to concentrate on the residual 940 new housing units.

14 Devizes Event specific questions 27/01/21

During the event, multiple questions were asked about the following topics, which are answered under the 'Common themes' in **Section 2**.

- Timescale 2.1
- Scale of Growth 2.2
- Housing Allocations 2.3
- Climate Change, the Environment and Biodiversity 2.6
- Employment 2.9
- Retail and the High Street 2.10

Further questions, specific to Devizes are as follows:

Q1 Government guidelines indicate that Local Plans should set out a positive strategy for the conservation and enjoyment of the historic environment. How will the conservation of the historic character of Devizes be included and supported in the updated Local Plan as an essential part of the town's economic future?

Q2 For decades the derelict former Assize Court has been a blight on the town. How will the constructive planning policies that were earlier included by the Council in its Core Strategy (including the Devizes Wharf regeneration proposals) be updated in the new Plan?

A1, A2. Place shaping Priorities have been developed, which will play a central role in developing planning policies and proposals for development. One priority proposed for Devizes is to" Ensure new development has high design standards to reflect the high-quality built form in Devizes." Another is "Encourage town centre and tourism-led regeneration including through the delivery of the Devizes Wharf Regeneration Scheme" The Council will continue to work with the Town Council to find the priorities best suited to delivering sustainable development and town centre improvements.

Q3 Have you considered a new eco-friendly scheme of building homes above existing carparks?

A3. No, this hasn't been considered as an option. However, suggestions are welcome as part of this consultation.

Q4: Is there provision in the plan for new GP surgeries in Devizes to cope with the growth of the population described in the plan?

Q5 Will secondary schools also be considered for expansion and/or additional schools?

Q6 Will the local Police station enquiry office be re-opened to deal with the expanding population of Devizes?

Q7 Will the plan cater for the increased need for support services. ie. schools, health services, transport improvements (pedestrian & cycle access). Devizes Parkway station etc?

A4, A5, A6, A7. The Planning for Devizes document includes a Settlement Profile which summarises the infrastructure issues and outlines new infrastructure required to support the proposed development. This includes information on GP provision, school places and transport. A new Police Station is not identified. There is a long term aspiration to provide a train station at the Lydeway and the Council is currently working with the Devizes Development Partnership to develop a Strategic Outline Business Case for submission to the Department for Transport in March/April 2021 and work is currently being carried out using funding from the Department of Transport to assess the viability of reinstating the railway station.

Q8: Site 6 Greenacres - Why is the site a proposal when it borders the Drews Pond Nature reserve and is surrounded by already rejected RED zones and has no reasonable access? Although theoretically a brownfield site, this does not take account of the green space and proximity to important habitat. Site 5 is a sensible solution and preferred option over Site 6.

Q9 Site 6 Greenacres - Did Wiltshire Wildlife bid for the site, but the bid was not high enough?

A8, A9. The site assessment work carried out so far has produced a pool of potential sites for further assessment. The assessment at Market Towns has focused on the wider impacts on landscape, heritage, flood risk, accessibility and traffic. Ecological considerations have not yet been taken into consideration and will inform the next stage of the site assessment process. The site assessment work carried out so far concluded the site should be taken forward for further assessment as there does not appear to be any overriding significant impacts related to landscape, heritage, flood risk, accessibility and traffic that justify excluding the site at this stage. Information about Wiltshire Wildlife Trust interest in the site is not known. Please submit comments to the Local Plan consultation and we will consider them and make any changes necessary as part of the next stage of the Local Plan process.

Q10 Does the MOD/civilian flight paths impact into any of the selected sites?

A10. The MOD/civilian flight plans are not included as part of the Local Plan site assessment process.

Q11 Does this plan take into the account the parallel consultation around opening the train station at Lydeway again, both from a housing but also transport perspective?

A11. This project is referenced in the transport section of the settlement profile in the Planning for Devizes document. However, this Local Plan consultation does not take into account the potential for a new train station at Lydeway in terms of housing and transport policy. Whilst the aspiration for the train station at the Lydeway is not new the proposals are at an early stage. The Council is working with the Devizes Development Partnership to develop a Strategic Outline Business Case for submission to the Department for Transport in March/April 2021. The next stage of the Local Plan Review will if appropriate consider any proposals arising from this work.

Q12 Economic emphasis has been placed on Chippenham, Westbury/Trowbridge and Salisbury for many years. Industry in market towns like Devizes is withering on the vine while the sale of residential development is turning them into commuter towns.

what encouragement can the authority give that support and encouragement for local jobs will be given?

A12. Previous consultation responses highlighted the need to promote more local jobs, however the approach taken in the Local Plan Review is based around the existing supply on the land that is already allocated in the Wiltshire Core Strategy. That does not preclude further sites being identified for employment, through a review of the Neighbourhood Plan. The importance of employment in Devizes is also recognised in the place shaping priorities in the Planning for Devizes document. The place shaping priority states: "Deliver jobs to maintain a buoyant local economy in Devizes, including bringing forward the employment allocations and employment development through mixed uses."

Q13 Will the Devizes Area Neighbourhood Plan lead on the selection of sites for development in Devizes?

A13. Yes, the Devizes Area Neighbourhood Plan can lead on the selection of sites for development in Devizes. At the moment the Planning for Devizes document states that the Local Plan will allocate sites but the Local Plan Review process will encourage the neighbourhood plan to identify these sites if it wants to.

Q14 Are the place shaping priorities in numeric order or prioritised?

A14. The place shaping priorities aren't prioritised.

Q15 Has consideration been given to the number of cars that will increase due to the new housing and adding to the poor air quality and considerable congestion centering on Devizes from A361, A342 and Salisbury Road?

Q16 Houses on the east of Devizes will most likely generate traffic along Windsor Drive, London Road or Nursteed Road to the already congested town centre. With an average of at least 2 cars per household these days, how many more cars do you envisage using these 2 existing routes?

Q17 The Devizes Transport Strategy is 2012 - when will the next strategy be presented?

Q18 Will there be a review of town bus services? There have been a number of new housing developments, and the new health centre will be opening next year, but the unsatisfactory circular routes have not changed for some years.

Q19 Site 7 runs parallel with Caen Hill. Caen Hill attracts fast moving traffic. What traffic calming plans are in consideration and what access to the proposed residential site are being considered?

A15, A16, A17, A18, A19. Issues regarding the A361 congestion, delays and air quality are already recognised in the Devizes Transport Strategy 2012. Further work will be carried out as part of the next stage of the Local Plan Review to update the Transport Strategy and this will include requiring better sustainable transport routes or improvements to crossings for new developments.

Q20 Do you think the plans to develop the Parkfields site will impact the area's open space and air quality?

Q21 Will priority be given to areas that do not directly impact existing housing and access points? E.g. Parkfields, the potential of doubling an estate causing parking, normal access and service vehicle access issues is a concern.

A20, A21. This site is not included as part of the site selection process for Devizes.

Q22 How many of the 330 houses are allocated within the Devizes plan? Are there other settlements within the area that have housing allocated to them, such as Market Lavington?

Q23 Do we only have to build c300 new homes between now and 2036?

A22, A23. The remaining housing requirement for Devizes for the Local Plan period 2016-2036 is 330. Sites to deliver this housing will need to be new allocations. The Council is suggesting that made neighbourhood plans are reviewed to consider new site allocations. The Council in its Empowering Rural Communities report has suggested specific housing requirement figures for Local Service Centres and Large Villages e.g. Market Lavington.

Q24 Surely, during the Plan period, most, if not all, of the Banks will close down their Retail operations leaving these imposing buildings empty. The Market Place is dominated by the grand buildings occupied by the major retail Banks. How should these buildings be repurposed? Retail, Office, Residential? The Plan should guide this.

A24. A new Retail and Town Centre Study was commissioned for this Local Plan Review and is available as one of the supporting documents for this consultation. This study will inform future retail town centre policies. In addition, changes to the use classes order in 2020 mean that town centre uses can now change use without applying for planning permission.

Q25 Furlong Close was listed by Wiltshire Council for redevelopment as long ago as 2017. The Council and Hft seem intent on selling the site so that both the Council and the Charity can profit from that sale. Who put forward the site for available, deliverable and developable in the short term for 112 houses in 2017 and had Wiltshire Council already indicated to, probably Hft, that it would lift the restrictive covenant on that site at that time. If not, how could the site be developable in the short term?

A25. Furlong Close is included in the Strategic Housing and Economic Land Availability Assessment (SHELAA) 2017. Sites included in the SHELAA are promoted to the Council by other parties including landowners and developers. It is important to note that whilst the SHELAA identifies potential sites, it does not allocate them for development or add weight to the site for the purpose of decision making on a planning application. The allocation of future sites for development will only take place through statutory plan processes (e.g. Local Plan, neighbourhood plans) which undergo public consultation and examination.

Q26 Can the Place-shaping Priorities reference the role of the Assize Court in regeneration? This will help with seeking funding.

A26. Suggestions for amendments to the draft Place-shaping Priorities can be made as part of the consultation. They will be considered as part of the next stage of the Local Plan Review.

Q27 Site 1 Horton Rd is Crown land. Have they given permission for the land to be sold and built on? It also butts onto an area with Roman Villa remains which can't be built on. Are there plans for archaeological survey to be carried out to see if there are further buildings?

Q28 Site 8 T Folly Road is Crown land, has there already been an agreement/discussion regarding selling off this portion of land? Do you think Folly Road (including the London Road junction) can cope with additional traffic?

Response

A27, A28. All the sites considered as part of the site selection work are sites included in the Strategic Housing and Economic Land Availability Assessment and which have been promoted to the Council for inclusion by landowners.

Q29 The Site Selection Plan Report uses Traffic, Landscape, Heritage & Accessibility for each site. What are the criteria used to measure these key factors for the assessment of each site? Are these details available for public view?

A29. Further details about the criteria used are explained in the Planning for Devizes Site Selection Report available as part of this consultation.

Q30 There are a number of known developments which will have some housing. Should these be included within the pool? E.g. Wharf project

Q31 What about brown field areas that will become available e.g. Devizes Hospital? How can they be included?

A30, A31. The draft Place-shaping Priorities include a priority encouraging the regeneration of the town centre through the redevelopment of the Wharf. This is a brownfield Site. A target for the delivery of housing on brownfield sites over the next 10 years has been suggested for Devizes in the Devizes Market Town Report. Any housing on the Wharf development will contribute to meeting this target.

Q32 When can we expect the Wharf strategy to be available?

A32. The regeneration of the Devizes Wharf remains a key policy objective for the town. The scheme is also seen to encompass the Assize Court project. There is a place shaping priority in the draft Local Plan Review papers that reflects this as follows: "Encourage town centre and tourism-led regeneration including through the delivery of the Devizes Wharf Regeneration Scheme."

It is a project with many landowners and stakeholders and Wiltshire Council is committed to working with all stakeholders to bring this regeneration project forward. This will be reflected in the Local Plan. Work is underway to consider the most effective policy vehicle for bringing the work forward, this may mean developing a masterplan for the area that can be used in planning decisions ahead of the adoption of the Local Plan. Any work on this will include all key stakeholders and the local community in Devizes.

Q33 Why build houses on 'green field' sites in Devizes at all, when large 'brown field' sites such as the old Bowyers site at Trowbridge and the Avon site at Melksham have been left empty/derelict for many years?

A33. The Emerging Spatial Strategy and Planning for Devizes reports, which form part of the Local Plan consultation say that needs for development should be met as far as possible on brownfield sites in order to help minimize the loss of greenfield sites. The Council suggests a target of how many homes could be built in Devizes on brownfield sites over the next 10 years. The brownfield capacity is lower than the residual housing requirement, hence why greenfield sites are being considered.

Q34 Are you proposing to retain the employment?

A34. Previous consultation responses highlighted the need to promote more local jobs, however the approach taken in the Local Plan Review is based around the existing supply on the land that is already allocated. That does not preclude sites being identified for employment, through a review of the Neighbourhood Plan.

Q35 What happens if there is large scale objection to development on all the Devizes sites?

A35. The quality and substance of comments made to this Local Plan consultation will be taken into account and changes made if necessary.

Q36 What is the difference between the neighbourhood plan that was put in place a couple of years ago and this local plan?

A36. The current adopted plan is the Wiltshire Core Strategy and this provided the strategic context for the made Neighbourhood Plan. The Local Plan Review once adopted will replace the Wiltshire Core Strategy and extends the plan period to 2036. The Council is suggesting that made neighbourhood plans be reviewed to be in line with the Local Plan Review.

Q37 Why are all the proposed sites on the east side of Devizes?

A37. The sites considered have all been included in the Strategic Housing and Economic Land Availability Assessment.

Q38 Why is Devizes part of the Chippenham area?

A38. The County has been divided into four Housing Market Areas. Devizes is located within the Chippenham Housing Market Area. The Housing Market Areas reflect the geographical areas in where people tend to live and work, where homes moves take place and where there are similar market rents.

Q39 Will there be any existing homes demolished to build replacement or additional new homes?

A39. The current proposals are for new development and do not involve the replacement of existing homes.

15 Trowbridge Event Specific Questions 27/01/2021

During the event, multiple questions were asked about the following topics, which are answered under the 'Common themes' in **Section 2**.

- Ensuring housing needs meets the towns demographic profile 2.2
- Calculating housing numbers and housing needs and ensuring the data being relied on is fair 2.2
- Consideration of a new settlement 2.2
- Accounting for brownfield sites 2.3
- Pursuing brownfield sites before greenfield 2.3
- How local people can get involved with aspects of development e.g. design and community facilities **2.4**
- Community Space 2.5
- Ensuring adequate infrastructure 2.5
- Protection and upkeep of green spaces 2.6
- Transport modelling 2.7
- Sustainable transport 2.7
- Changes to the way we live and work post-Covid 2.7, 2.9, 2.11
- Ensuring developers deliver on plans 2.8
- Calculating employment land and considering changes to employment 2.9

Further questions, specific to Trowbridge are as follows:

Q1. How do you plan to protect the green corridor of biodiversity between Trowbridge and Southwick village from the worst effects of building at Wiltshire Housing Site Allocations Plan (WHSAP) sites H2.4, H2.5 and H2.6?

- A1. The ecology and recreational value of the Southwick Country Park is fundamentally important. The policies set out in the adopted WHSAP aim to conserve and enhance the importance of the Lambrok as a green corridor and thereby respect Country Park as an important green open space.
- Q2. The Green Belt constraint has prevented growth on the north west of Trowbrige resulting in increasing coalescence with the nearby villages of Hilperton, North Bradley, West Ashton and Southwick. Is there a case for limited Green Belt release in this LPR on the basis that prospective GB sites are closer to the town centre? Or direct development to other Market Towns?
- A2. Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified (see NPPF). There are several alternative sites outside green belt land available to consider, including the preferred ones (see Trowbridge Site Selection Report). Other alternatives may also come forward as part of this consultation. Given these facts, in our view an exceptional circumstance to justify altering green belt boundaries around Trowbridge cannot be justified; not yet at least.

The approach has been to consider development on sites that extend the existing built up area. Sites adjoining other wholly detached settlements do not fit this criterion. At this stage of plan preparation, such sites are considered less sustainable. Evidence to contradict that

judgement can be submitted as part of the consultation and, if so, fully considered as part of further work toward a draft plan. And the last option open to us.

Q3. Can Wiltshire Council explain why Staverton has been included in the Trowbridge Local Plan and Southwick and North Bradley have not? Can you please confirm how many homes are expected to be built on site 4 in Staverton?

A3. Staverton is located in the Bradford on Avon Community Area but adjoins Trowbridge and should be considered in relation to both Trowbridge and Bradford on Avon. The Area Strategy for Trowbridge plans for the continuous urban area of Trowbridge and so includes consideration for Staverton.

Q4. What has been the in-migration to Trowbridge during the last five or ten years? Have you considered the housing density already in Trowbridge?

A4. Over the period 2001 to 2019, the population of Trowbridge has grown significantly with an additional 10,351 residents now living at the town (c. 31% increase). If this trend continues, the town will need to find more land for housing and employment. Housing density already in Trowbridge has been considered. There is a variety across the town, generally denser near the centre where more flatted homes are located. Historically, lower density post-war estates evolved around the centre, and more recently slighter higher density extensions have occurred. National government guidance is to gently increase densities of new developments where sustainable. The incorporation of Green and Blue Infrastructure networks is a fundamental new characteristic of modern development, distinct from historic development within the town. Development densities vary in connection with these environmental requirements. Government guidance requires balancing the efficient use of land against the need for good design.

We have assumed that the right balance is an average density of 45dph along the centre of the development, and an of 35dph across the remainder. This can deliver a broad mix of homes, the vast majority of which would be houses.

If there were a consensus in the local community that a different balance should be struck, (whether less or denser) then they should suggest and explain it and we could discuss amending the masterplan.

Q5. The Trowbridge Town Council has identified many building spaces within its boundaries, why are brownfield sites not considered over building on green spaces around Trowbridge? With vacant spaces in the town due to a decline in retail, can these spaces be repurposed for residential use? Wouldn't houses closer to facilities, which would require fewer car journeys be better?

A5. National policy says that brownfield should come first wherever practicable. However, we also have to look at greenfield options as well.

Under Wiltshire Core Strategy Core Policy 2 brownfield sites that are within the settlement boundary of the town will have a presumption in favour of development and therefore would not need to be allocated. The Council would wish to work with the Town Council in bringing these sites forward. This is taken into account when providing a brownfield figure for the town.

Q6. Can you explain how the expected flooding will be mitigated on site 4 and in the Staverton area? The extra traffic generated from houses in Staverton & Hilperton will not all use the A350. What is being done to diminish the already congested river crossing in Staverton? If the sites north of Hilperton are selected, will a Staverton Bypass and new Avon bridge be built? Do you have traffic models showing the impact on roads that sites 4 & 5 would have?

A6. It is fundamentally important not to propose development within critical flood zones (i.e. Flood Zones 3 and 2). We have a Strategic Flood Risk Assessment and built development is planned within Flood Zone 1 where there is the least risk. Moreover, flood risk from all sources has been included as a potential constraint within the site assessment process. Of critical importance in plan making and site identification/assessment is the need to ensure that any new development does not lead to flood risk elsewhere

The Atkins report is an early transport study that has looked at potential impacts of the proposals at the principle Settlements. This has identified that mitigation will be needed. Also included is Active Travel and encouraging cycling and walking where possible and improvements to public transport. Local road network may also need localised traffic improvements.

At this stage the report is not saying there's a need for major strategic road improvements, but it does refer to the existing issue at Staverton where there is a pinch point associated with the length of the traffic light controlled junctions. Currently we are bidding for funding which will enable the Council to develop proposals to help find the right solution. The delivery of the scheme will possibly provide important mitigation for any proposed scheme at this time.

To date two transport feasibility studies have been funded by Wiltshire Council. In October 2016 Atkins completed the 'B3105 Staverton Bridge Feasibility Report' which recommended an embankment causeway as the preferred solution. In July 2019 Atkins completed the 'Staverton Bypass Feasibility Appraisal Report' which built on the 2016 study by updating the transport modelling and investigating the embankment option in more detail.

In November of this year the embankment option was discussed with the Environment Agency (EA) and it became evident that an embankment would not be acceptable to the EA. Instead a viaduct solution that would minimise the impact on the flood plain needed to be developed.

During the meeting with the EA it also became clear that there might be an opportunity to reduce flood risk more widely and provide environmental enhancements through the scheme. More feasibility work is needed to confirm whether this is viable.

In order to develop a viaduct solution and assess the potential for wider flood risk reduction and environmental enhancement, Wiltshire Council has submitted a bid for local levy funding to the Wessex Regional Flood and Coastal Committee. We should know whether this has been successful after their next meeting on 28 January 2021. If funding is awarded Wiltshire Council will commence the work as soon as possible and identify any potential funding routes if the scheme is found to be viable.

Q7. Money has been granted to develop the centre of Trowbridge, for example to provide more shop, but where are these businesses going to come from particularly when there are already so many vacant sops already?

A7. We have a provisional allocation of £16m for Trowbridge through the Future High Street Fund - 70% of what we bid for. We are currently preparing a technical update to be sent to the Ministry for Housing, Communities and Local Government for end of February to show deliverability within this new funding envelope.

Through the funding Trowbridge has the chance to significantly reposition and redefine its town centre offer.

Key outcomes following securing funding will include:

- Improving connections and legibility into the town centre
- Transforming the gateway experience
- Bringing more leisure, residential and culture activity into the town centre
- Making better use of vacant units to enable a diverse and sustainable mix of uses within Trowbridge Town Centre
- Accelerating future development by facilitating the strategic development of key sites within the town centre core
- A successful allocation of Future High Streets Fund will enable Wiltshire Council to work with partners to initiate the regeneration process and attract in other public and private sector funding to rejuvenate the town.

Q8. Will you be taking this opportunity to review the suitability of, for example, historic employment allocations at Trowbridge where these have not come forward for the intended use and where they may now be more appropriate for alternative uses including residential?

A8. An opportunity to review the Place-shaping Priorities in the plan making process may very well include the opportunity to review long-standing employment allocations that remain to be built out. If you consider that alternative options should be reviewed, please put them forward in your consultation response.

Q9. What is the latest information on a Green Blue Infrastructure document for Trowbridge to ensure those Green corridors for the bats and other wildlife are protected and enhanced prior to building? Looking at the GBI maps, there is a need to have a more direct route for the Bechstein's from green lane/Biss Wood to those key sites within the Bath SAC, on to Southwick country park, and Widbrook Wood.

A9. An update on the Green and Blue Infrastructure was reported to Cabinet recently as part of Agenda Item 14, update on climate change (<u>Agenda for Cabinet on Tuesday 2 February 2021, 10.00 am | Wiltshire Council).</u>

The Strategy and a wide range of other data will be taken into account when considering further development for Trowbridge in order to ensure it provides the necessary corridors for bats moving between the woods and the Special Area for Conservation. The adequacy of the corridors will be tested by the Council as part of an iterative assessment process under the Habitats Regulations and this will be reviewed by Natural England. It is likely the Trowbridge Bat Mitigation Strategy will be expanded with the aim of ensuring that woodland

and grassland connections are better than the existing situation for bats after development including while housing allocations are built out.

Q10. The sites near Staverton are very peripheral to the existing town centre of Trowbridge. Do you have any evidence that these would not be very car-dependent? What has changed that would allow these allocations in locations divorced from the town boundary, why were similar locations not allowed previously?

Through the development of the Local Plan all proposed allocations will be guided by evidence and policies, including the need to enhance sustainable transport modes and develop additional routes for active travel.

Q11. As part of the Bat Mitigation policy a new open space was proposed. Where is this likely to be? Alongside bat populations, is it not likely that great Bradford will host similar rare species as the Green Lane Woods? It doesn't seem to have been considered in the Trowbridge bat mitigation strategy, but Great Bradford wood is very close to these proposed development sites.

A11. On the face of it, Great Bradford Wood is well located to support roosting Bechstein's bats since it is deciduous woodland of suitable size and comprises ancient woodland. It is not possible to be sure without surveying the woodland to determine whether it has trees with suitable holes for their roosts. Even without survey we can assume the woodland provides foraging for not only Bechstein's but also greater and lesser horseshoe bats. However, the reason this woodland was excluded from the Trowbridge Bat Mitigation Strategy (TBMS) is that it is not open to the public and therefore not at risk to the recreational pressures which the TBMS specifically seeks to address.

Q12. As the importance of the Lambrok Corridor biodiversity is researched and understood, is it possible that the 270 houses planned for the urban/rural green gap between Trowbridge and Southwick could be absorbed into the future plans for development north of Trowbridge?

A12. The Wiltshire Housing Site Allocations Plan has been through a rigorous plan making and examination process and the sites H2.4, H2.5 and H2.6 have been found to be sound and hence allocated for development. They are currently subject to planning applications and the Lambrok Corridor will be masterplanned in accordance with the respective policies.

Q13. Does the need to secure a new Secondary School effectively fix the housing requirement for Trowbridge at 2,600 dwellings?

A13. Land for a secondary school has been secured on the Ashton Park site. But the site for the school is considered to be too small to support any additional growth beyond that planned at Ashton Park. Future planned growth at the town will therefore require a new secondary school, but there would need to be a sufficient number of new homes to support a viable school. As such, it is advised that to provide a cogent strategy for meeting the long-term educational needs of the town, more housing than is currently forecast for delivery would be needed.

The alternative education strategy would be to secure land for a new secondary school that could then be utilised as and when projected growth (i.e. projected pupil numbers) at the town exceeds the capacity of existing and committed schools in the area.

To accommodate the amount of development proposed will require a Secondary School Provision – 1 (No.) 8 Forms of Entry School

16 Warminster Event Specific Questions 28/01/2021

During the event, multiple questions were asked about the following topics, which are answered under the 'Common themes' in **Section 2**.

- Promoting consultation 2.1
- Housing Market Areas 2.2
- Housing density 2.3
- SHELAA availability 2.3
- Neighbourhood Planning and rural housing delivery 2.4
- Protecting green spaces 2.6
- Energy infrastructure 2.6
- Flood risk 2.6
- Biodiversity Net Gain 2.6
- Biodiversity maps availability 2.6
- River Avon Special Area of Conservation (SAC) and phosphate issue 2.6
- Enforcement of the Plan 2.8

Further questions, specific to Warminster are as follows:

Q1. Why is Site 2 (Land East of the Dene) included as an option when this site was rejected by the Planning Inspector examining the Wiltshire Housing Site Allocations Plan?

A1. The rejection of a site through a previous plan making process or a refusal of a planning application at a site is not an exclusionary criterion. The land in question remains part of our database, which indicates it is available therefore it is included in our initial pool of sites. Detailed assessment excludes this site during the next stages of assessment. Nonetheless, if the land was to go forward as a proposed allocation, it would not comprise the proposals that were tested at the examination of the Wiltshire Housing Site Allocations Plan for the reasons set out by the Planning Inspector.

Q2. Why is the Warminster Neighbourhood Plan still being used if it is no longer valid being more than two years old?

A2. As part of the development plan for Wiltshire, the Plan still carries weight in decision making.

The assertion relating to neighbourhood plans being out of date up on reaching a certain date relates entirely to applications for the provision of housing. The Warminster Neighbourhood Plan and indeed any neighbourhood plan that is older than two years is still valid as a part of the Development Plan, which is the starting point for decision making no matter the age of the documents that make it up. In applying paragraph 14 to the Warminster Neighbourhood Plan in deciding applications for housing, it is worth considering that the Warminster Neighbourhood Plan does not allocate land for housing. Nonetheless, it has

achieved designations such as Local Green Space which would carry significant weight if a planning application for housing was to come forward on either of these sites.

Additionally, neighbourhood plans continue to be identified as a key tool to enable communities to influence development and address issues, such as climate change at a local level. The indicative residual requirement for Warminster is presented as 60 homes in addition to that which is in the pipeline and has the potential to be allocated through a neighbourhood plan.

Q3. Why is the planning application at Damask Way not shown on the map as a potential development site considering it has outline permission?

A3. This site is subject to outline permission, it is therefore considered to be a 'commitment' and as such it is counted as being in the pipeline at this current time. The 60 homes that will be identified by the Local Plan Review will be in addition to those in the pipeline.

Q4. Is the Council confident that the West Warminster Urban Extension will be fully built out by 2036?

A4. The West Warminster Urban Extension is forecast to be fully built out by the end of 2036 based on current evidence.

Q5. If the plan is to increase the number of houses on the West Warminster Urban Extension over the period of the Local Plan Review, does this mean that it was due to too much land was allocated for this site in the Wiltshire Housing Site Allocations Plan rather than infrastructure constraints that only 900 houses were allocated?

A5. Paragraph 11 of the Planning for Warminster consultation paper states:

'The Warminster West Urban Extension is the most significant developable commitment at the town. The planning application process has identified a capability to deliver a higher number of homes than was anticipated by the Wiltshire Core Strategy. In line with the Wiltshire Core Strategy allocation, the

urban extension is to deliver approximately 900 homes prior to 2026. A remainder of approximately 650 additional homes is to be delivered up to 2036.

The Warminster West Urban extension was allocated by the Wiltshire Core Strategy (adopted 2015). The sites related to this allocation have been the subject of several planning applications. The most important with relation to the quantum of development at the allocation is 16/01323/MAS. This relates to the masterplan for the entirety of the allocation. Significantly, assessment through the planning application process was able to consider onsite constraints in detail and housing delivery beyond the Wiltshire Core Strategy plan period, the period between 2006 and 2026. The masterplan was endorsed by Wiltshire Council's Strategic Planning Committee on 15 June 2016. The report for this meeting and other details relating to the permissions for the allocation can be found on the Council's website.

Q6. If you cite that you are very aware of mitigating flooding, and therefore developing on potential flood-risk areas, why are you committed to building so many within the remit of WWUE, when much of it is in a flood zone? Or is it an easy win to increase the numbers?

A6. Flood zones and particularly Flood Zones 2 and 3 are key considerations in the plan making and development management process. While every effort is made to direct development to areas of least risk (Flood zone 1), national planning policy also requires plan makers to consider cumulative flood risk with the aim of ensuring that planned development does not exacerbate flood risk off site. In assessing potential site options around Warminster, consideration of these matters has been undertaken using the recently prepared Level 1 Strategic Flood Risk Assessment.

It is acknowledged that the land the subject of the West Warminster Urban Extension allocation is subject to areas within Flood Zones 2 and 3, which indicates there is flood risk associated with the site. However, large areas of the allocation are not subject to these critical flood zones, but again flood risk from other sources (ground and surface water) are acknowledged. In addressing these factors through the planning application and masterplan processes, the Council was provided with sufficient evidence to demonstrate how flood risk from all sources could be managed on a sequential basis – i.e. holding water within a series of attenuation ponds sited in areas of the site that would be incapable of development.

17 Melksham Event Specific Questions 28/01/2021

During the event, multiple questions were asked about the following topics, which are answered under the 'Common themes' in **Section 2**.

- Timescale 2.1
- Scale of Growth 2.2
- Housing Allocations 2.3
- Transport, sustainable and active travel 2.7

Further questions, specific to Melksham are as follows:

Q1. What level of educational and healthcare infrastructure will be developed alongside the expansion?

A1. Sufficient educational and healthcare infrastructure will be provided to support growth to meet the needs generated by that growth, in line with Core Policy 3 of the Wiltshire Core Strategy. The Planning for Melksham report includes a Settlement Profile. This summarises measures in place or being put in place to address known infrastructure issues and their timing, what additional provision would be needed to support growth and what other opportunities there may be e.g. new schools and/or GP provision.

Q2. What additional infrastructure is planned to support this huge growth in housing?

A2. The Planning for Melksham report includes a Settlement Profile. This summarises measures in place or being put in place to address known infrastructure issues and their timing, what additional provision would be needed to support growth and what other opportunities there may be e.g. new schools and/or GP provision. Sufficient infrastructure will be provided to support growth to meet the needs generated by that growth, in line with Core Policy 3 of the Wiltshire Core Strategy.

Q3. In meetings, Melksham Town Council and Melksham Without Parish Council have said that housing development should not be the vehicle for a bypass. A bypass is needed before housing development takes place. What is the view in the Local Plan?

A3. The Place Shaping Priorities in the Planning for Melksham report state that an A350 bypass is a priority for the town and an Outline Business Case is being undertaken. It is possible that some housing development will come forward before a bypass is in place, but housing development is not the vehicle for a bypass.

Q4. If the by-pass goes to the east of the town, will Site 1 be developed as a priority?

A4. The Planning for Melksham report lists 17 potential sites around Melksham which will all be assessed equally against the same sustainability criteria through the site selection process. No decisions have been made about which sites to take forward. If there is a bypass to the east of the town (and potential routes, at this stage, are still being consulted on), this does not mean that any one particular site or sites will be progressed over others.

Q5. Does the Council consider there to be a specific scale of growth (new homes) that can be delivered before a bypass is necessary and if so, what would this figure be?

A5. There is no specific scale of growth that can be delivered before a bypass is in place. Any planning application will need to be assessed on its merits. The Place Shaping Priorities in the Planning for Melksham report state that an A350 bypass to the town is a priority to improve the efficiency of the transport network and lead to other benefits for the town.

Q6. Will the route of the potential bypass determine the direction of growth?

A6. The Planning for Melksham report lists 17 potential sites around Melksham which will all be assessed equally against the same sustainability criteria through the site selection process. No decisions have been made about which sites to take forward. The eventual preferred bypass route does not mean that any one particular site or sites should be progressed over others.

Q7. When will the details of the selected Eastern route of the A350 bypass be published?

A7. No route has yet been chosen. Consultation on potential route options took place from 5 November 2020 to 17 January 2021. Further consultations are anticipated later in 2021 as the scheme progresses towards route adoption and the development of the Outline Business Case. Further details will be advertised through news items, via the local media and on the Wiltshire Council website.

Further information can be found on the Wiltshire Council website at https://www.wiltshire.gov.uk/article/3146/A350-Melksham-bypass

Q8. During recent consultation on the A350 bypass the Council said that all 19 route options were being looked at equally. The local plan says that an Eastern bypass to the town is a priority. Which is correct?

A8. The Local Plan does not say that an eastern bypass is a priority. The draft Place Shaping Priorities in the Planning for Melksham report states that an A350 bypass to the

town is a priority to improve the efficiency of the transport network and lead to other benefits for the town.

No route has yet been chosen. Consultation on potential route options took place from 5th November 2020 to 17th January 2021. Further consultations are anticipated later in 2021 as the scheme progresses towards route adoption and the development of the Outline Business Case. Further details will be advertised through news items, via the local media and on the Wiltshire Council website.

Q9. If the bypass isn't an influencer in terms of priority for site selection, why is the bypass and housing development intrinsically linked?

A9. The draft Place Shaping Priorities in the Planning for Melksham report states that an A350 bypass to the town is a priority to improve the efficiency of the transport network and lead to other benefits for the town. A bypass will allow further growth to take place at Melksham in the future, but in terms of site selection, the 17 potential sites identified around Melksham will all be assessed equally against the same sustainability criteria through the site selection process. No decisions have been made about which sites to take forward. The eventual preferred bypass route does not mean that any one particular site or sites should be progressed over others.

Q10. How are so many more roads compatible with sustainability?

A10. A wide variety of measures will be proposed to encourage and make it easier to change from car travel to more sustainable modes of transport. However, this work also shows how the scale and pattern of growth will affect the road network and what investment might be needed over the plan period. All types of infrastructure to meet the needs of the proposed growth will need to be considered. This includes infrastructure for sustainable modes of travel as well as new road infrastructure.

Q11. Why is additional capacity on the A350 needed, when independent studies and statistics show that the level of traffic on the A350 hasn't changed in 20 years?

A11. The A350 is one of the most important routes in Wiltshire. It has been a longstanding priority for the council to improve north-south connectivity along the A350, but to also recognise the important local function that the existing route serves at Melksham, and issues such as journey time delays and poor reliability, accidents, severance and noise and air quality. The scheme was one of nine priority schemes identified by the Western Gateway Sub-National Transport Body. The scheme is being promoted through the Department for Transport's Large Local Majors Fund - specifically intended to support a small number of exceptionally large local highway authority road schemes.

Q12. Is there a cycle network proposed to go alongside the Melksham expansion?

A12. Any new site allocations proposed at Melksham will include a requirement to provide sustainable transport links e.g. new cycle ways, to join up with existing cycle ways and other rights of way.

Q13. Will there be an increase in support to the train station with more work done to increase the number of trains running through the station?

A13. Current joint working between TransWilts Community Rail Partnership, Network Rail, Great Western Railway and Wiltshire Council to develop and enhance Melksham rail station, forecourt, parking and facilities is identified in the transport section of the Settlement Profile included in the Planning for Melksham report.

Q14. In Paragraph 18 the paper says that we are capable of meeting employment needs. Land is not needed for employment. Further on it says out commuting should be reduced through an improved employment offer, but Paragraph 27 says there is no need for employment land. How do you square this circle?

A14. Based on current evidence further employment land is not needed at Melksham. The draft Place Shaping Priorities have been developed following discussions with the Town Council and one of the draft priorities is to reduce out-commuting through an improved employment offer. The Council will continue to work with Town and Parish Councils to find the priorities best suited to delivering sustainable development. An improved employment offer does not necessarily mean additional land is required; an improved employment offer can be achieved through current employment areas and allocations.

Q15 The Employment Land Review says that there is a plentiful brownfield land in the short term. But this plan is to 2036. Is that short term?

A15. The Employment Land Review considers the balance between supply and demand for employment land over the 20-year Local Plan period and over an initial five-year period.

Q16 Where are the jobs for all these people in Melksham otherwise the town's status as a dormitory for the surrounding large towns, e.g. Bath, Bristol, Swindon, will be reinforced?

A16. As explained in the Emerging Spatial Strategy, the Wiltshire Core Strategy identified and allocated a significant supply of land for employment needs. The scale of supply far exceeded forecast need in order to provide a good choice of sites and flexibility. The Council has reviewed existing employment land supply alongside the forecasts it has received. Taking account of forecast rates of take up and demand, the current pool of land for industry and office uses generally continues to meet anticipated needs.

Q17 It has been said that Melksham is a 'less constrained' settlement and therefore relieves pressure at the most sensitive settlements. But does this mean that need is not being met appropriately at the more sensitive settlements?

A17. The Emerging Spatial Strategy Report explains the methodology and reasons for distribution of growth. The results of sustainability appraisal identified the level of environmental constraints at other main settlements within the HMA (Corsham, Devizes and Malmesbury) should lead to a smaller proportion of growth if possible.

Q18 Other settlements are receiving comparable levels of growth (namely the Principal settlements) however please can you explain the justification for placing this level of growth at a market town such as Melksham?

A18. The Emerging Spatial Strategy Report explains the methodology and reasons for distribution of growth. Three alternative development strategies for the Chippenham Housing

Market Area were tested. The Chippenham Expanded Community option (CH-B), with a focus on Chippenham performed best in sustainability terms. However, the Sustainability Appraisal also recognised the potential for growth at Melksham. Higher growth here has also been seen as a means to help deliver road infrastructure during discussions with the Town Council. In this regard, the Government has announced funding support to progress an A350 Melksham bypass. A preferred scale of development is therefore the higher of the range tested at Melksham (as in CH-C).

Q19 Site 5 includes a 14acre mature woodland with 5000 indigenous British trees - If this site is developed will the trees be felled? If the woodland is surrounded by houses it will become the victim of vandalism and all the permissive paths will be closed to the public. Why is this not listed as a constraint?

A19. Key constraints have been identified for all sites and this woodland is identified on the map. Site 5 is one of 17 sites around Melksham that will be assessed through the site selection process and no decisions have been made on which sites to take forward. The woodland to the south of Site 5 is not within the site itself. If this site were to be developed, any development would need to leave a significant buffer zone between it and the woodland and measures would need to be put in place to manage impacts on the wood in the long-term.

Q20 How can we secure high levels of public open space within the expanded areas?

Q21 Will this not diminish green space and require travel from the development 'satellite' areas?

A20, A21. Public open space, like other essential infrastructure, will be required for any new site allocations. The Planning for Melksham Paper includes a Settlement Profile which summarises measures in place or being put in place to address known infrastructure issues and their timing, what additional provision would be needed to support growth and what other opportunities there may be. For Green and blue infrastructure, a multi-functional network has been identified and maps show where improvements will need to be sought.

Q22 The map shows the south of Melksham in the Trowbridge HMA, and the rest in the Chippenham HMA. Will it have to take housing numbers for both HMAs?

A22. Melksham Town is in the Chippenham HMA. The town will have a housing requirement figure to meet based on the overall distribution of growth within the Chippenham HMA. Melksham Town will not be meeting the housing needs of Trowbridge HMA.

Q23 Why is the current Neighbourhood Plan not proposing additional sites? And why are they progressing to Regulation16 if the local plan review requires additional sites to be identified?

A23. The current neighbourhood plan has reached an advanced stage and the Neighbourhood Plan Steering Group have decided to continue with the current neighbourhood plan and then begin an immediate review to take account of the emerging Local Plan proposals. The review of the neighbourhood plan may look to allocate further non-strategic sites once it is known what strategic sites are proposed in the Local Plan Review, to avoid duplication of work.

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