



Wiltshire Local Plan Review

Scope of the Plan (Regulation 18 consultation)

Report of Consultation Process

Event:
November/December 2017

Report Published:
February 2019

1 Introduction

Background

- 1.1 The Council is reviewing the Wiltshire Core Strategy, adopted in January 2015, which sets out planning policies and identifies land for development for the period to 2026. The review of the Wiltshire Core Strategy (renamed the Wiltshire Local Plan) will extend the period to which the plan relates to 2036.

Scope of the Plan consultation

- 1.2 Following approval by Wiltshire Council's Cabinet on 10 October 2017 a consultation on the scope and content of the review of the local plan was held between 7 November and 19 December 2017. The consultation sought the views of the local community on the scope of the review, including the preparation of a Joint Spatial Framework to consider how development across the Borough of Swindon and the Wiltshire Council area should take place. The Wiltshire Local Plan Review 'Scope of the Plan' consultation was the first stage of reviewing the Wiltshire Core Strategy (renamed the Wiltshire Local Plan).
- 1.3 The consultation was carried out in accordance with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012. This report documents the process of consultation that took place to hear the views of Wiltshire's local communities.
- 1.4 The Regulation 18 consultation also provided an opportunity to start to engage with the community and other interested parties about the development of a Joint Spatial Framework with Swindon Borough Council. As a consequence, the Regulation 18 consultation on the Wiltshire Local Plan Review ran concurrently with that for the Swindon Local Plan Review.

Wiltshire Local Development Scheme

- 1.5 The Local Development Scheme (LDS) of September 2017¹ stated that:

"The purpose of the review of the adopted Local Plan will be to assess the future levels of need for new homes (including market, affordable and specialist housing and Gypsy and Traveller accommodation) and employment land over the period

¹ Wiltshire Council's Local Development Scheme (September 2017) explains the purpose and content of the Wiltshire Local Plan Review and Joint Spatial Framework in more detail. Available to view online at: <http://www.wiltshire.gov.uk/planning-policy-lds>

2016-2036 and to provide an appropriate basis for housing, employment land and infrastructure provision over that period.

It will involve considering if the existing adopted development strategy remains relevant, identifying new site allocations relating to housing and employment together with supporting services and infrastructure.

The review will also include:

- *Some updating of existing Wiltshire Core Strategy development management policies to ensure their continued consistency with national policy;*
- *the introduction of additional development management policies in response to the review of the saved development management policies not replaced by the Wiltshire Core Strategy; and*
- *developing additional locally distinctive policies to plan positively for all town centres in Wiltshire consistent with national policy.*

It will not be the purpose of the review to change or remove strategic objectives or policies that remain in accordance with national policy and support the delivery of sustainable development.”

Consultation Documents

- 1.6** The consultation invited comments on two main documents: the ‘Wiltshire Local Plan Review: Consultation Paper’ and the ‘Swindon and Wiltshire Joint Spatial Framework Issues Paper’.
- 1.7** The Council also invited representations on a draft Sustainability Appraisal Scoping Report. This proposed a Sustainability Appraisal Framework, including objectives and decision aiding questions, to be used in the assessment of draft policies and proposals as part of the plan making process. The assessment criteria will be aligned to the Wiltshire Local Plan and Swindon Borough Local Plan to ensure consistency of approach across the combined plan area. The Wiltshire Sustainability Appraisal Scoping Report and the Swindon Borough Sustainability Scoping Report were consulted on alongside the Regulation 18 consultation.
- 1.8** **Table 1** shows all of the documents that were published as part of the consultation. All of the information that was published is available on the Council’s website at:

<http://www.wiltshire.gov.uk/planning-policy-local-plan-review> and
<http://www.wiltshire.gov.uk/planning-policy-sw-joint-spatial-framework>

Table 1: Documents that were published as part of the Local Plan Review Regulation 18 consultation

Consultation Documents		
Wiltshire Local Plan Review Consultation Paper	Wiltshire Local Plan Review	Wiltshire Council
Swindon and Wiltshire Joint Spatial Framework: Issues Paper	Joint Spatial Framework	Swindon Borough Council and Wiltshire Council
Swindon and Wiltshire Joint Spatial Framework: Chippenham Housing Market Area	Joint Spatial Framework	Wiltshire Council
Swindon and Wiltshire Joint Spatial Framework: Salisbury Housing Market Area	Joint Spatial Framework	Wiltshire Council
Swindon and Wiltshire Joint Spatial Framework: Swindon Housing Market Area	Joint Spatial Framework	Swindon Borough Council and Wiltshire Council
Swindon and Wiltshire Joint Spatial Framework: Trowbridge Housing Market Area	Joint Spatial Framework	Wiltshire Council
Wiltshire Sustainability Appraisal Draft Scoping Report	Wiltshire Local Plan Review	Wiltshire Council
Wiltshire Sustainability Appraisal Draft Scoping Report Appendices	Wiltshire Local Plan Review	Wiltshire Council
Evidence		
Strategic Housing Market Assessment (SHMA)	Joint Spatial Framework	Opinion Research Services (ORD)
Functional Economic Market Area Assessment (FEMAA)	Joint Spatial Framework	Hardisty Jones Associates

1.9 This report provides a summary of the actions that were taken to raise awareness of the consultation in accordance with the relevant regulations and the Council's

Statement of Community Involvement (July 2015)² and a summary of the comments received.

2 Process of Consultation

2.1 Comments were invited during a six week consultation period between 9am on Tuesday 7 November 2017 and 5pm on Tuesday 19 December 2017. The consultation was planned to meet all of the requirements of Regulation 18 ('preparation of a local plan') of the Town and Country Planning (Local Planning) (England) Regulations 2012, which states:

“(1) A local planning authority must-

(a) notify each of the bodies or persons specified in paragraph (2) of the subject of a local plan which the local planning authority propose to prepare, and

(b) invite each of them to make representations to the local planning authority about what a local plan with that subject ought to contain.

(2) The bodies or persons referred to in paragraph (1) are-

(a) such of the specific consultation bodies as the local planning authority consider may have an interest in the subject of the proposed plan;

(b) such of the general consultation bodies as the local planning authority consider appropriate; and

(c) such residents or other persons carrying on business in the local planning authority's area from which the local planning authority consider it appropriate to invite representations.

(3) In preparing the local plan, the local planning authority must take into account any representation made to them in response to invitations under paragraph (1).”

2.2 The Wiltshire Statement of Community Involvement (SCI) identifies the categories of consultation that should be considered at each stage of development plan document preparation. For the Wiltshire Local Plan Review Regulation 18 consultation, the following methods were used:

² The full Statement of Community Involvement (2015) is available to view online at: <http://www.wiltshire.gov.uk/planning-policy-sci>

Awareness raising	Existing networks	Direct involvement
Emails/letters Press notices Website Leaflets	Area Boards Libraries Parish and Town Councils WISEnet Our Community Matters website	Briefings Workshop

Awareness Raising

- 2.3** All contacts registered on Wiltshire Council's consultation database were sent an email or a letter informing them of the consultation. This included those who had submitted comments during previous spatial planning consultations and those who had expressed an interest in previous planning documents. Approximately 5,200 emails and 340 letters were sent out using this method. A template of the letter that was used is attached in **Appendix 1**.
- 2.4** Following Cabinet approval of the Wiltshire Local Plan Review consultation, an email was sent to Town and Parish Councils in Wiltshire giving advance notice of the consultation (**Appendix 2**). This information was also published as part of the Parish Newsletter (**Appendix 3**).
- 2.5** As the consultation involved many different elements, a short leaflet was prepared to explain the relationship between the consultation documents and provide details on how to comment. Copies of the leaflet were provided at the events described in the direct involvement section of this report and available in local libraries. The leaflet is attached in **Appendix 4**.
- 2.6** A formal public notice was placed in three local newspapers: the Salisbury Journal (1 November 2017), the Wiltshire Times (2 November 2017) and the Gazette and Herald (02 November 2017). An example of the public notice is shown in **Appendix 5**.
- 2.7** As mentioned in the notification letters and press notice, the consultation documents were made available to view and download on the council's website (**Figure 1**).
- 2.8** Consultees were able to respond to the consultation via post, email or the council's consultation portal. Respondents were encouraged to use the representation form, shown in **Appendix 6**.

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Consultation Home > Spatial Planning > Wiltshire Local Plan Review > Wiltshire Local Plan Review Reg 18 > Swindon and Wiltshire Joint Spatial Framework Issues Paper

Swindon and Wiltshire Joint Spatial Framework Issues Paper

The event is not currently available for consultation.

Wiltshire Local Plan Review and Joint Spatial Framework

Help shape Wiltshire's Local Plan to 2036

To help us prepare the Local Plan Review we are seeking comments on the issues the review should address in order to plan for the period to 2036. To stimulate discussion the Council has prepared a 'Consultation Paper' which includes a number of focused questions. We are now inviting comments on the **Wiltshire Local Plan Review Consultation Paper**. This is the first stage of consultation and an opportunity for everyone to 'have their say' and help shape the Local Plan Review. No decisions have yet been made on the future locations for growth and development beyond that contained within the adopted Local Plan. The Wiltshire Local Plan Review Consultation Paper can be found below, via the 'supporting documents' tab.

In addition, a **Swindon and Wiltshire Joint Spatial Framework Issues Paper** has been prepared to stimulate discussion and includes specific questions on which the council would like to hear your views.

The Council is also inviting representations on a **draft Sustainability Appraisal Scoping Report**. This proposes a Sustainability Appraisal Framework, including objectives and decision aiding questions, to be used in the assessment of draft policies and proposals as part of the plan making process.

Also available are two technical studies; a Strategic Housing Market Assessment (SHMA) and a Functional Economic Market Area Assessment (FEMAA), which outline the development need for housing and employment in Swindon and Wiltshire between 2016 and 2036. For further information on these technical documents visit: <http://www.wiltshire.gov.uk/planning-policy-sw-joint-spatial-framework>

How to access the consultation documents and submit comments

Comments are invited on all the consultation documents and supporting evidence during the 6 week consultation period, which runs from **9am on Tuesday 7 November until 5pm on Tuesday 19 December 2017**.

The consultation documents are available below, via the 'supporting documents' tab. The consultation documents can also be viewed during normal opening hours at the Council's main offices at Monkton Park (Chippenham), Bourne Hill (Salisbury), County Hall (Trowbridge) and at all Wiltshire Council Libraries.

We welcome your comments online via the council's dedicated consultation portal (preferred method). Click on the **'Read and comment on document'** icon below to view and comment on the Issues Paper. In order to comment online you must first log in or register if you have not yet done so already. To comment on the other documents please fill out the representation form available via the 'supporting documents' tab and email to spatialplanningpolicy@wiltshire.gov.uk

Alternatively comments will be accepted by post in writing to: Spatial Planning, Economic Development & Planning, Wiltshire Council, County Hall, Bythesea Road, Trowbridge, Wiltshire, BA14 8JN.

Your comments will be carefully considered and be used to help develop a draft Preferred Options Local Plan Review document and a draft Joint Spatial Framework document scheduled for public consultation later next year.


Data Protection and Privacy Notice












The information collected through this public consultation will be processed in accordance with the Data Protection Act 1998. For more information on how the Council uses your personal information visit: <http://www.wiltshire.gov.uk/privacy>

Comments received, including contact details, may be shared with or copied to Swindon Borough Council by email or via consultation software for the purpose of preparing the Swindon Local Plan review, including the Joint Spatial Framework. For further information, please visit: <http://www.wiltshire.gov.uk/planning-policy-local-plan-review>

Call for sites

If you have land which you would like the Council to consider for development please let us know. Please note that if you have already submitted site(s) to Wiltshire Strategic Housing and Employment Land Availability Assessment you do not need to be re-submit these unless you have updated information. For further information on submitting sites visit: <http://www.wiltshire.gov.uk/planning-policy-monitoring-evidence>

 Read document and view comments

Event Information	Supporting Documents	All Comments
Here are links to a selection of supporting media to this consultation event.		
	01 WLPR Wiltshire Local Plan Review Consultation Paper.pdf (Size: 441.18K)	
	02 SWJSF Issues Paper.pdf (Size: 1,419.06K)	
	03 SWJSF Chippenham Housing Market Area Profile.pdf (Size: 6,173.74K)	
	04 SWJSF Salisbury Housing Market Area Profile.pdf (Size: 3,897.09K)	
	05 SWJSF Swindon Housing Market Area Profile.pdf (Size: 4,685.29K)	
	06 SWJSF Trowbridge Housing Market Area Profile.pdf (Size: 4,545.79K)	
	07 WLPR Representation Form.docx (Size: 83.83K)	
	07 WLPR Representation Form.pdf (Size: 85.82K)	
	08 Consultation leaflet.pdf (Size: 248.01K)	
	09 WLPR Wiltshire Sustainability Appraisal Draft Scoping Report.pdf (Size: 1,083.11K)	
	10 WLPR Wiltshire Sustainability Appraisal Draft Scoping Report Appendices.pdf (Size: 3,438.53K)	

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Figure 1: Wiltshire Council's consultation webpage for the Regulation 18 consultation.
 Accessible at: http://wiltshire.objective.co.uk/portal/spatial_planning/wiltshire_lp_review/

Existing Networks

2.9 Chairman's announcements for Area Board meetings were produced which included the strategic issues and key questions identified in the consultation papers relevant to each area. An example is shown in **Appendix 7**. These were circulated in advance of Area Board meetings that were held between 6 November 2017 and 7 December 2017. This included:

- Pewsey Area Board (6 November)
- Chippenham Area Board (6 November)
- Royal Wootton Bassett and Cricklade Area Board (8 November)

- Malmesbury Area Board (8 November)
- Salisbury Area Board (9 November)
- Tidworth Area Board (13 November)
- Melksham Area Board (15 November)
- Trowbridge Area Board (16 November)
- Devizes Area Board (20 November)
- Calne Area Board (21 November)
- Bradford on Avon Area Board (22 November)
- Corsham Area Board (23 November)
- Marlborough Area Board (28 November)
- Amesbury Area Board (30 November)
- South West Wiltshire Area Board (6 December)
- Westbury Area Board (7 December)
- Southern Wiltshire Area Board (7 December)

2.10 The Chairman's announcements were also published online on each Community Area's 'Our Community Matters' webpage. An example is shown in **Appendix 8**.

2.11 A letter outlining the consultation was posted on WISEnet and circulated to the Headteachers of schools across the county (**Appendix 9**).

2.12 A promotional video explaining the consultation and how to comment was published on YouTube and promoted on Wiltshire Council's social media from 7 December 2017. The video is available at: https://youtu.be/6P_3m0Ja0kl

2.13 As mentioned in the notification letters and public notice, hard copies of the documents were available to view at the council's main office hubs (Trowbridge, Chippenham and Salisbury) and at all of the council's libraries.

Direct Involvement

2.14 As shown in Appendix 2 and 3, the advance notice of the consultation sent to Town and Parish Councils in Wiltshire and the Parish Newsletter also invited them to four briefing events - one each in Trowbridge, Royal Wootton Bassett, Chippenham and Salisbury, held in November 2017. A report of these briefings is available in a separate report³.

³ WCON03 Scope of the Plan (Regulation 18 consultation) Report of Parish Briefings, February 2019

- 2.15** Contacts on the council's consultation database tagged with a 'Developer' code and additional 'Developers and Agents' provided by Swindon Borough Council were sent an email (**Appendix 10**) reminding them of the consultation and inviting them to a Developer Forum held on 13 December 2017. A report of this event is available in a separate report.

Sustainability Appraisal

- 2.16** To meet the consultation requirements for a Sustainability Appraisal Scoping Report, the scope of the plan consultation was also planned to accord with Regulation 13 of the Environmental Assessment of Plans and Programmes Regulations 2004⁴:

"13.—(1) Every draft plan or programme for which an environmental report has been prepared in accordance with regulation 12 and its accompanying environmental report ("the relevant documents") shall be made available for the purposes of consultation in accordance with the following provisions of this regulation.

(2) As soon as reasonably practicable after the preparation of the relevant documents, the responsible authority shall—

(a) send a copy of those documents to each consultation body;

(b) take such steps as it considers appropriate to bring the preparation of the relevant documents to the attention of the persons who, in the authority's opinion, are affected or likely to be affected by, or have an interest in the decisions involved in the assessment and adoption of the plan or programme concerned, required under the Environmental Assessment of Plans and Programmes Directive ("the public consultees");

(c) inform the public consultees of the address (which may include a website) at which a copy of the relevant documents may be viewed, or from which a copy may be obtained; and

(d) invite the consultation bodies and the public consultees to express their opinion on the relevant documents, specifying the address to which, and the period within which, opinions must be sent.

⁴ <http://www.legislation.gov.uk/ukSI/2004/1633/contents/made>

(3) The period referred to in paragraph (2)(d) must be of such length as will ensure that the consultation bodies and the public consultees are given an effective opportunity to express their opinion on the relevant documents.

(4) The responsible authority shall keep a copy of the relevant documents available at its principal office for inspection by the public at all reasonable times and free of charge.

(5) Nothing in paragraph (2)(c) shall require the responsible authority to provide copies free of charge; but where a charge is made, it shall be of a reasonable amount.”

2.17 As the Sustainability Appraisal consultation was integrated with the Local Plan Review consultation, many of the requirements were satisfied by the Town and Country Planning (Local Planning) (England) Regulations 2012 and Statement of Community Involvement July 2015.

2.18 However, a distinct letter was sent out to the statutory consultation bodies as listed under paragraph 4 of the Environmental Assessment of Plans and Programmes Regulations 2004 (EAPPR), inviting them to comment on the consultation documents and accompanying evidence reports (**Appendix 11**).

Call for Sites

2.19 As referred to in the consultation leaflet, the council held a 'Call for Sites' throughout the consultation period, inviting potential development sites to be submitted to the council for consideration. This was also advertised on the website (**Figure 2**)

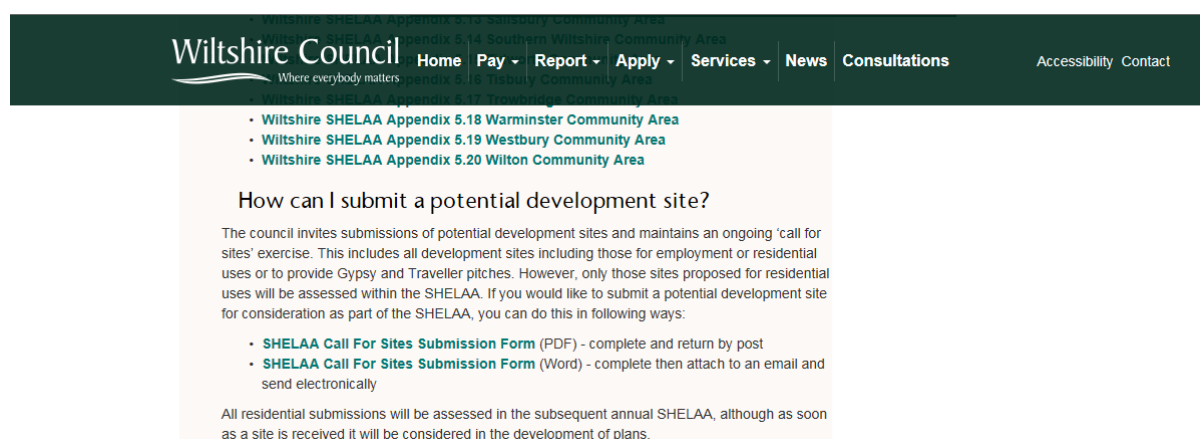


Figure 2: Wiltshire Council's website advertising the Call for Sites exercise. Accessible at:

<http://www.wiltshire.gov.uk/planning-policy-monitoring-evidence>

3 Summary of Consultation Responses

Wiltshire Local Plan Review Consultation Paper

- 3.1** In total, 183 representations on the Wiltshire Local Plan Review Consultation Paper were received by 138 respondents.
- 3.2** Of the 138 respondents, 84 were submitted by individual consultees and 54 were submitted by agents on behalf of a consultee. A breakdown of all 138 respondents is shown in **Table 2** below.

Table 2: A summary of the type of consultee who commented on the Wiltshire Local Plan Review

Consultees	
Statutory Advisory Bodies	7
Other Advisory Bodies	2
Infrastructure Provider	1
Parish/Town Council	29
General Public	16
Resident/Civic Society Association	2
Landowner	1
Local Interest Group	4
Developer	8
Military	1
Transport	2
No group code assigned	11
Total	84
Consultees represented by Agents	
Infrastructure Provider	1
General Public	1
Landowner	23
Developer	11
National Interest Group	1
General Business and Industry	2
Housing Bodies	1
No group code assigned	14
Total	54

- 3.3** Of the comments received which referenced a Housing Market Area (HMA), the majority were in reference to the Chippenham HMA. The proportion of all comments relating to each HMA is shown in **Figure 3**.

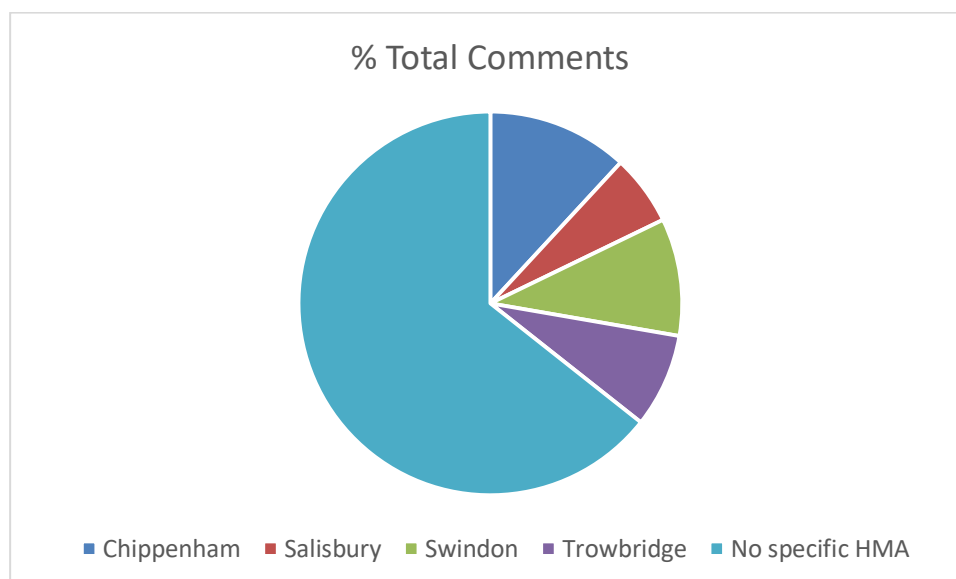


Figure 3: Proportion of representations on the Wiltshire Local Plan Review Consultation Paper which referred to each HMA

- 3.4** The majority of representations to the Wiltshire Local Plan Review were in answer to Question 3 (67%). The response rate for each question is shown in **Table 3**.

Table 3: The percentage of responses to each question in the Wiltshire Local Plan Review Consultation Paper

Question	% Response
1 – Do you agree with the proposed scope of the Wiltshire Local Plan Review as set out in Section 4? If no, please explain why and how it should be amended.	52%
2 – Do you agree with the conclusions of the policy assessment set out in Appendix 2 and the proposed recommendations? Please explain your answer.	63%
3 – Are there other planning policy issues that the Council should consider within the Local Plan Review? If so, what are they and why should they be included?	67%

Swindon and Wiltshire Joint Spatial Framework Issues Paper

- 3.5** A total number of 504 responses were received by Wiltshire Council to the Swindon and Wiltshire Joint Spatial Framework from 206 different respondents. Swindon Borough Council have reported on the responses they received separately.
- 3.6** Of the 206 respondents, 128 were consultees and 78 were agents submitting comments on behalf of a consultee. A breakdown of all consultees by type is shown in **Table 4** below.

Table 4: A summary of the type of consultee who commented on the Swindon and Wiltshire Joint Spatial Framework Issues Paper

Consultees	
Statutory Advisory Bodies	7
Other Advisory Bodies	3
Infrastructure Provider	2
Parish/Town Council	28
MP/MEP's	1
General Public	31
Charity and Voluntary Organisations	1
Local Businesses	1
Landowner	2
Local Interest Group	4
Developer	10
General Business and Industry	1
Military	1
Transport	2
No group code assigned	34
Total	128
Consultees represented by Agents	
Infrastructure Provider	1
General Public	3
Local Business	1
Landowner	31
Developer	17
National Interest Group	1
General Business and Industry	1
Housing Bodies	1
No group code assigned	22
Total	78

- 3.7** Of the comments which referenced a particular Housing Market Area (HMA), the majority were in reference to the Chippenham HMA. The proportion of all comments relating to each HMA is shown in **Figure 4**.

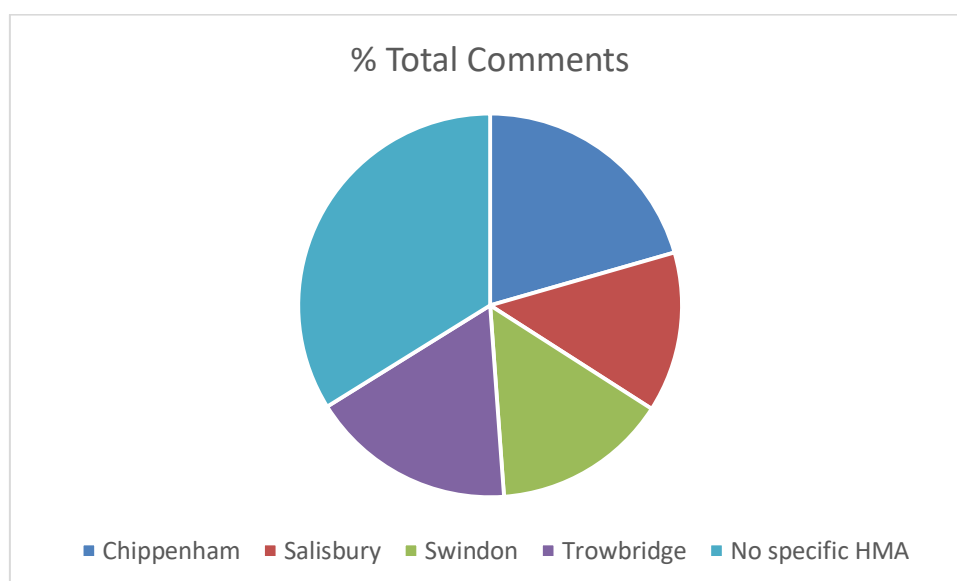


Figure 4: Proportion of representations on the Swindon and Wiltshire Joint Spatial Framework which referred to each HMA

- 3.8** The majority of representations received in relation to the Swindon and Wiltshire Joint Spatial Framework Issues Paper were in answer to Question 9 (29%). The response rate for each question is shown in **Table 5**.

Table 5: The percentage of responses to each question in the Swindon and Wiltshire Joint Spatial Framework Issues Paper

Question	% Response
1 – Do you agree with the proposed scope of the Swindon and Wiltshire Joint Spatial Framework as set out below? If not, please explain why.	23%
2 – Do you agree with the proposed objectives for the Swindon and Wiltshire Joint Spatial Framework as set out below? If not, please describe how they should be changed.	21%
3 – The Swindon and Wiltshire Strategic Housing Market Assessment (SHMA) presents technical evidence of the projected level of housing needs in the period 2016 to 2036. Do you have any comments on the findings of the SHMA?	21%

4 – The Functional Economic Market Area Assessment (FEMAA) presents technical evidence of the projected level of need for employment land in the period 2016 and 2036. Do you have any comments on the findings of the FEMAA?	13%
5 – Do you consider that the methodology proposed in the programme of work to test the sustainability of delivering the scales of growth in each Housing Market Area and each Functional Economic Market Area is robust? If not, in your response, please explain why.	15%
6 – The Housing Market Area Profiles present the current Plan's vision for each settlement based on its role and function. Do you think this should change? Please tell us which settlement and explain your answer. For each settlement identified in the Housing Market Area Profiles there are also a number of key findings and issues identified. Do you think these are correct and how should the Councils respond to the questions raised? Please tell us which settlement(s), and explain your answer.	27%
7 – For each Housing Market Area, strategic issues are also identified. Do you think these are correct and how should the Councils respond to the questions raised? Please explain your answer by reference to a specific Housing Market Area.	19%
8 – Are there any specific development constraints that you think should be taken into account in the preparation of the Joint Spatial Framework that have not been identified in the Housing Market Area Profiles? Please explain your answer by reference to a specific Housing Market Area or settlement.	17%
9 – Are there any specific development opportunities that you think should be taken into account in the preparation of the Joint Spatial Framework that have not been identified in the Housing Market Area Profiles? Please explain your answer by reference to a specific Housing Market Area or settlement.	29%
10 – Do you have any comments on the advantages or disadvantages of any of the above concepts for growth alone or in combination? Are there other options not considered? Please explain your answer by reference to a specific Housing Market Area or settlement.	18%

General Comments – Do you have any further comments to make on the proposed Joint Spatial Framework or matters raised in this Paper?	21%
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4 Summary of Main Issues

4.1 This section provides a summary of the comments received in response to the Wiltshire Local Plan Review Consultation Paper and the Swindon and Wiltshire Joint Spatial Framework Issues Paper. All individual comments are available to view on the consultation portal:

http://wiltshire.objective.co.uk/portal/spatial_planning/wiltshire_lp_review/

Wiltshire Local Plan Review Consultation Paper

4.2 **Table 6** summarises the comments made in response the Wiltshire Local Plan Review Consultation Paper by the relevant policy within each Strategic Objective.

Table 6: Summary of comments made in response to the Wiltshire Local Plan Review Consultation Paper

Strategic Objective 1 - Economy
<p>PR1 Telecommunications</p> <ul style="list-style-type: none"> • Include new policies for digital economy; knowledge sectors and mixed-use sites. • Enhanced broadband necessary and new policy for superfast broadband to be required in new development. • Address mobile signal knot-spots. • Refer to smaller masts, antennae. • Ensure policies for masts are robust to protect Green Belt. • Clarification required for how criteria apply in Areas of Outstanding Natural Beauty (AONBs). • Ensure adequate infrastructure provided to support market towns.
<p>PR2 Retail and town centre policies</p> <ul style="list-style-type: none"> • Support deletion of policies and replacement with new policies based on evidence and consultation. • For the applications for visitor accommodation at Center Parcs the approach has been taken that if the five tests of Core Policy 39 are satisfied than Core Policy 38 is not relevant. Clarify in either the wording of Core Policy 38 or its subtext. • Provide better protection and positive policies for town centres.

- Support retail provision in appropriate places.
- Refer to reducing car travel.
- New policy required for Lowbourn Library site.
- Remit should include the relationship between housing, economic developments and the need to access appropriate and adequate retail infrastructure to reduce the need for car travel.

PR4 Farm diversification

- Suggested new policy for agricultural workers dwellings.
- Include reference to horse related development and impacts on local communities.
- Conflict with certain aspects of diversification e.g. provision of equine facilities and reuse of buildings within the Green Belt for tourist activities in that the openness of the Green Belt is being adversely affected. Provide improved policy and guidance.
- Local Plan policy must follow the direction set out in Cranborne Chase's AONB Position Statement.
- Core Policy34: more weight should be given to the negative effect of these type of diversifications on local communities before they are given planning permission.
- Policies identified are sufficiently vague as to cause ambiguity and inconsistencies in the determination of such applications across Wiltshire.

PR5 Employment

- Support new evidence being collected e.g. Employment Land Review (ELR).
- Some settlement based comments provided.
- New policy supporting the mixed-use redevelopment of existing employment sites which are presently of low employment value would ensure that housing is available in proximity to employment provision whilst increasing the capacity of exiting employment land through better quality buildings and appropriate layouts.

Strategic Objective 2 – Climate Change

PR41 Climate change

- Encouraging higher standards of energy conservation in buildings needs to be addressed and the Government failure to do so should not go unchallenged.
- The reuse of grey water, collection of rain-water should be encouraged as well as environmental (including ecological) consideration of material use and building style.
- Consider space being required for cycle paths, parking for bicycles, street trees, and sustainable urban drainage. Recommend an approach similar to the 'healthy streets approach'.

- Mitigating policies that adopt adaptive management strategies should be developed with key partners.
- Different soil types should be identified, protected and enhanced, recognising that different soils support different flora and fauna.
- Explore policies on water efficiency in new developments, particularly rainwater and grey water recycling with ambitious aims for consumption to 80 litres per person/per day or similar approved according to local evidence.
- All future developments must provide an adequate allocation of trees to help in countering the effects of climate change.
- Core Policy 41 should be reviewed in respect of the latest national planning policy including the withdrawal of the Code for Sustainable Homes.
- There appears to be no policy concerning wind turbines, solar farms, battery storage sites biodigester sites, biomass sites and other renewable electrical generation sites.
- Current policy is totally inadequate for the purpose and needs to be radically improved.
- In direct conflict with policies such as the parking strategy which seeks to reduce public transport provision.
- Need for clarity on how the Core Strategy already contributes to tackling climate change by building communities which are resilient to the future impacts of a changing climate.
- The Core Strategy should be employment-led, investing in infrastructure and economic development that provides good quality jobs, alongside affordable homes, in the local area, for local people, in line with an emerging high tech/ low carbon economy.
- Use permeable surfaces wherever possible e.g. parking areas; maintain ditches to increase absorption of surface water to groundwater level.
- Push for clean renewable technologies for energy (including commercial transport fuel) production which do not compete for land use with food, animal feedstuffs or organic returns to the soil; increase renewable energy use on commercial, public and residential buildings.
- More information on proposals to be incorporated in future commercial and residential development and also about enforcement strategies would be useful.

Strategic Objective 3 - Housing

PR6 Replacement of existing dwellings in rural areas

- Support for conversion of farm buildings and rural area housing allocations policy.

<ul style="list-style-type: none"> • Concern over erosion of the character of the Green Belt. • Do not delete policies unless fully reproduced. • Ensure that replacement dwellings are of a similar scale to those which they replace.
PR7 Temporary housing for rural workers <ul style="list-style-type: none"> • A new policy should be informed by Planning Policy Statement 7 (PPS 7) Annex A. • Clarity needed over use of word "temporary" and definition of a rural worker. • Support recommendation.
PR8 Extensions to dwellings and buildings in the countryside <ul style="list-style-type: none"> • Clarity needed on the circumstances in which planning permissions will not be necessary for some residential extensions. • Policy should state that appropriate-sized extensions which take into account the character of the existing dwelling will be permitted. • Concern about erosion of the character of the Green Belt. • The Council could benefit from preparing a Design Guide Supplementary Planning Document (SPD).
PR9 Accommodation for dependent persons <ul style="list-style-type: none"> • Delivering beneficial Sheltered Housing and Extra Care Accommodation should be prioritised in Wiltshire to meet its identified housing needs. • It is inappropriate to mix specialist housing for the elderly with other (family/younger persons) housing in a single flatted block. • Include 'Local Service Centres' where there is a need for accommodation for elderly people and local support to allow for such development outside the settlement boundary.
PR10 Flat conversions <ul style="list-style-type: none"> • Support subject to meeting relevant parking standards. • Conversions need to be appropriate for the property and provide accommodation which is of an adequate size which allows for a quality of life.
PR11 Housing allocations <ul style="list-style-type: none"> • Support for review of site allocations including site specific saved policies (x11). • Support for Salisbury District Local Plan (SDLP) H15 to be retained (x2). • Development in villages can contribute to local need thereby reinforcing strong communities, increase the viability of rural services and stimulate local economic opportunities and benefit from walkability.
PR38 Housing for healthcare workers, Salisbury District Hospital

- Suggest new policies on residential developments for single and disadvantage people and provision for local essential workers (NHS / education).

PR42 Self build and custom build

- Support new policy (x10).
- A more flexible policy approach is to allow for custom build housing which is considered to be a more appropriate way of planning for this use of land than prescribing a specific proportion of plots on a larger housing site to be left for self-build.
- The Council should be wary of identifying prescriptive requirements for self-build plots as the identification of land to meet these needs could potentially have a detrimental impact on the availability of allocated land to meet the “traditional” needs for market and affordable housing in Wiltshire, which are known and are significant.
- Self and custom builders have been among the pioneers of low carbon or negative carbon housing; however, a major constraint is the availability of plots. Lower affordable housing thresholds also make self-build projects more financially viable.

PR43 Affordable housing threshold

- Address new national requirements for affordable housing (x2).
- Lack of delivery and enforcement, particularly in rural villages.
- Need to allocate and develop Local Authority built housing.
- Policy should only be amended where appropriate and subject to viability (x3).
- Updates to policies, including Core Policy 43 and Core Policy 45, should seek to instigate a step change in delivery, driving change through a pragmatic and ambitious approach to affordable housing tenures to encourage greater diversity.
- Support for lower threshold (x2).
- Low-cost open-market housing should be considered as ‘affordable’.
- Support the review.

PR44 Optional housing standards

- Support production of a Design Guide.

Other comments

- There should be over-riding priority given to Objective 2 – “to provide everyone with access to a decent, affordable home”.
- Core Policy 2 has imposed stagnation on the size of Langley Burrell at a time when its population is also ageing. Request for flexibility in Core Policy 2.

- Include a policy to make sure that rural areas take their fair share of housing allocations.
- Include a policy which ring fences affordable housing for rent by Wiltshire Council or social landlords.

Strategic Objective 4 – Resilient Communities

PR13 Location of education and community facilities

- Support Strategic Objective 4 (x1).
- Tourism should be included.
- Clarity needed.
- North Wiltshire Local Plan (NWLP) CF1 changes should be subject to consultation.
- Include a new policy ensuring that provision of facilities listed in PR13 is included.
- No mention of local shops which are needed to reduce the need to travel (see NPPF paragraph 37/38)⁵. This could be included in PR13 or PR14.
- The only secondary school in Warminster is currently inadequate in size and facilities. Need to ensure that educational opportunity is there for all Warminster residents and those residents in outlying villages.
- It would be helpful if reference could be made where developments could impact Gillingham or Shaftesbury schools. This could also be reflected in any Planning Obligations/Community Infrastructure Levy (CIL) strategy as appropriate (Dorset County Council).

PR14 Community facilities allocations

- New policy should be included that states any community facility should be made available to local residents at all times.
- No mention of local shops.
- Request for an up to date Built Facilities Survey.
- PR14 is welcomed (Dorset County Council).

PR15 Health and wellbeing

- All Strategic Development sites should provide community facilities.
- Support recommendation (x4).
- Due to the impact of pharmaceuticals from sewage treatment works (STW) entering the aquatic environment, Wessex Water is supportive of measures to create a healthier region. Recommend that new policy considers steps to reduce health inequalities by ensuring that the wider determinants of health are addressed

⁵ The NPPF was revised in 2018. This comment refers to paragraphs in the previous NPPF before the revised NPPF was published in July 2018.

in a coordinated way; promoting active lifestyles; enabling people to make healthy choices and using Health Impact Assessments (Wessex Water).

- Health care provision should take into account cross boundary synergies particularly those highlighted in the Dorset Clinical Services Review 2017 which highlights the relationship with Salisbury together with wider demands for specialist provision. Some of this demand will be impacted by the proposed growth and changing population profiles (Dorset County Council).

PR46 Healthy living

- Support recommendation (x3).
- Unclear why new policy is needed.
- Adopt a systematic approach to improving the mental and physical health of people in Wiltshire, through promoting an active lifestyle and healthy choices and assessing the potential impacts/opportunities of development proposals on health and wellbeing of communities e.g. Health Impact Assessments.
- Include references to active travel modes.
- Take into account NICE guidelines e.g. Guidance 41.
- Include closer working with Wiltshire Clinical Commissioning Group (CCG) to facilitate delivery of high quality primary health care facilities and services.
- In considering potential land to be allocated for housing, the Council should appraise the accessibility and sustainability of each reasonable alternative including in relation to health and wellbeing objectives.
- The NPPF was published before the Wiltshire Core Strategy was examined and then adopted so it is unclear why an additional policy is now needed to respond to this national policy document.

PR16 Public safety from major accidents

- Support recommendation (x2).

Other issues

- The Local Plan Review should consider planning policies associated with the re-use and conversion of buildings in the countryside.

Core Policy 48:

- is inconsistent with Paragraph 55 of the National Planning Policy Framework in respect of residential uses.
- should be reviewed in the context of a range of permitted development rights for the change of use of buildings which have been introduced through planning legislation following the Core Strategy adoption

- should be amended in relation to dwellings required to meet the employment needs of rural areas so that it is applicable to all settlements, including market towns to ensure local needs of workers are met and to ensure the high demand for key worker and other forms of low-cost or below-market rent affordable housing is met.

Strategic Objective 5 – Natural and Build Environment

PR17 Enabling development

- Support recommendation (x1).
- As this is only allowed in exceptional circumstances as an exception to established policies constraining development, it would be irrational to have a policy permitting it.
- Does not adequately deal with Grade II listed structures or non-designated heritage assets.
- Need to reference Historic Environment Records (HER) as an important information source for Neighbourhood Plans.
- Enabling development should be a last resort, and policy statements should indicate that all other approaches to ensuring the conservation of cultural assets should be explored fully before resorting to enabling development.
- Rename as Heritage and Enabling Development.

PR18 Disabled access

- Support recommendation (x1).
- Policy needs to be clear, detailed and specific as it is too easy for developers to evade current wording (x2).

PR19 Design of shopfronts

- Clarity about what is permitted for shopfronts should be included in the Local Plan.
- More effort should go into ensuring that shopfronts are appropriate to the quality of the building.

PR20 Trees, woodland and tree planting schemes

- Ensure important wildlife corridors are maintained or created between elements of the build environment.
- Green spaces are vital to wellbeing and so there should be a policy to reflect this.
- Need for clarification about the standard of planting and the timing of it.
- What is the evidence to support this recommendation?
- Applications for work to trees in a conservation area should have to explain why the work is necessary.

- Importance of trees outside of Conservation Areas needs to be formally recognised.
- Refer to Savernake forest.
- Request for specific policy (x3).
- Support recommendation (x2).
- Object to deletion of NE14 (x3) unless Core Policy 51 is strengthened.

PR21 Open space and recreation policies

- Concern over use of management companies.
- Request from Town Council to be involved in determination and allocation of Section 106 monies.
- Support review (x8).
- Various suggestions for new policy criteria.
- Clarity needed.
- Object to deletion of West Wiltshire Local Plan (WWLP) policy R12 and R13 unless reproduced (x2).
- Green Infrastructure Strategy long overdue. Open Spaces Study out of date (x5).

PR22 Hazardous substances/noise and pollution/sterilisation

- Support recommendation (x1).
- Transport has a significant impact on air quality (x3).
- Promote tree and bush planting with “corridors” for wildlife, and use to increase stability of land, as well as multiple other eco-system benefits.
- Existing policy not sufficient. There needs to be safeguards for existing residents from new developments.
- Object to deletion of NWLP NE18.

PR23 Special Landscape Areas

- Support recommendation (x3).
- Clarification needed between Special Landscape Areas (SLAs) and AONBs (x2).
- Incorporate AONB landscape issues into the Wiltshire Landscape Strategy.
- Protect Chitterne located adjacent to Salisbury Plain SLA.
- Consult on Landscape Review methodology.
- Do not delete WWLP policy C3 unless fully reproduced.
- Protect the landscape whilst recognising the need to release land for development.
- Inappropriate to identify specific landscape areas within south and west Wiltshire and insert them into this policy as it would lead to an inconsistency of approach across the county.

<ul style="list-style-type: none"> • Opportunities for Special Landscape policies and positive protection of AONBs should be reviewed for all of Wiltshire, not just in Salisbury and West Wiltshire. • Allow farms in the AONB to diversify, expand buildings and address rural need for housing for farms/farm staff.
PR24 Inappropriate development in residential gardens <ul style="list-style-type: none"> • Support recommendation (x2). • Strengthen policy e.g. Core Policy 57 to resist 'garden grabbing' and ensure adequate amenity space. • New tree policy required.
PR25 Land stability <ul style="list-style-type: none"> • Support recommendation (x2).
PR26 Protection and enhancement of Public Rights of Way <ul style="list-style-type: none"> • Support recommendation (x2). • Disagree with recommendation. There are multiple examples of instances where new developments are cut off from neighbouring amenities because footways and cycleways are not protected. • It is not clear as to how this issue is covered by Core Policies 57 and 60 whereas 15 and 60 seem more appropriate. • Delay in publishing Green Infrastructure Strategy. • Lack of mention or consideration of Public Rights of Way (PRoW). • Improve PRoW and cycle routes policy (x6).
PR27 Local Green Space designations <ul style="list-style-type: none"> • Support. Necessary for neighbourhood plans, town and parish councils who are considering local green space designations (x5). • Greenspace designations must be of equal importance to meeting housing requirements.
Other comments <ul style="list-style-type: none"> • Need to consider designated and non-designated heritage assets. • Core Policy 57 needs to be reviewed to ensure that existing landscape considerations are the starting point for new development. • There is hardly any mention of rural issues and protection of the countryside, especially around the principal settlement of Trowbridge, and setting of rural villages in the countryside. • Support Green Belt alteration around Trowbridge and Bradford on Avon (x2). • Object to Green Belt alteration around Trowbridge and Bradford on Avon (x1).

- Policies or additional guidance relating to development in the Green Belt would be beneficial to the determination process, especially in respect to the extent to which existing dwellings can be extended and whether the Council is in agreement with the widely accepted 30% increase in volume, as detailed in most other Council's policy documents.
- Core Policy 58 should comprise a listed settlements policy.
- Provision of greenspace, focus on wildlife, landscape and the environment needs to be a stronger focus.

Strategic Objective 6 - Infrastructure

PR28 Water and sewage safeguarding areas

- Support (x2).
- Object to deletion of WWLP policy U5 unless fully reproduced.
- Update policies to follow water company policies.
- Less reliance should be placed on EU Directives in light of Brexit.

PR29 Developments with river frontages and public access, use of culverts

- Broaden policy to cover all bodies of water including lakes, ponds and canals, support development proposals that facilitate river restoration, similar to Core Policy 5 of the Joint Spatial Plan.
- Disagree that a separate policy is not required.

PR30 Flood risk

- Support recommendation (x2).
- Core Policy 67 needs to also address increased pluvial flood risk caused elsewhere by new development and extensions.
- Make specific references to rivers and associated flood plains including a reference to Marlborough.
- Upstream measures may be needed to avoid worsening the situation in Bradford on Avon town centre and there should be supporting text to make this clear.
- Mere Town Council concerned about abstraction licenses.
- Support greater attention being given to taking full account of the risk of development affecting flood risk elsewhere, including areas some distances away downstream.

PR31 Safeguarded land – transport

- Support recommendation (x2).
- Reconsider proposal to delete NWLP T5 (x2).
- Combine with PR26 Rights of Way.

<ul style="list-style-type: none"> • Need to protect existing public rights of way and safeguard future routes.
<p>PR32 New distributor road</p> <ul style="list-style-type: none"> • Support T4a recommendation. • CP66 only centres on primary traffic routes and does little for towns that do not sit along the A350. Need for further work on transport in more remote towns. • Saved policy T4F of the WWDP 1st Alteration and the general provision to saved policy T4 – “No frontage access development will be permitted along the lengths of the proposed distributor roads” – should be maintained. • Request to safeguard route in Melksham for eastern bypass Beanacre to Semington (x2). • Request for new policy to provide for upgrading of access and improvements to rail facilities. • Clarification sought on why the Consultation Paper refers to the Oldfield Road Westbury connection as T4B, however, it is identified as T4F on the Wiltshire Core Strategy policy map.
<p>PR33 New link road</p> <ul style="list-style-type: none"> • There may be a need for further link roads in other towns, such as Devizes. • Support protection of an A350 dualling scheme from Lackham roundabout to the A303 and a Swindon western bypass corridor.
<p>PR34 Swindon and Cricklade Railway Line</p> <ul style="list-style-type: none"> • Support recommendation. • Railway Society has the objective of extending the line to Cricklade, but that part of the route which is not laid to track forms an important walking and cycling route. • Suggestion for new policy which allows for crossings by a road bridge over the Swindon and Cricklade railway line.
<p>PR35 A350 Shaftesbury Eastern Bypass</p> <ul style="list-style-type: none"> • Support recommendation (Shaftesbury Town Council). • Should not simply be ‘rolled forward’ because of the previous policy position. If it is not deliverable, it should be removed. • Suggested alternative route. • Issue should be enlarged to include the promotion of an A350 Westbury Bypass too (x2).
<p>General comments</p> <ul style="list-style-type: none"> • Planning policies need to ensure adequate infrastructure and that congestion/traffic is eased and not worsened (x3).

- Completion of a Green Infrastructure Plan and Transport Plan is urgent.
- Consider providing additional guidance on accessibility and sustainability.
- Amendments needed to methodology for transport modelling work – this demands a use of rather more sophisticated modelling tools that are better able to assess how far sustainable transport measures are able to damp demands for additional highways capacity, especially for more local journeys.
- Suggest that a broader definition of infrastructure is inserted to make it clear that it includes both traditional and physical infrastructure and emerging forms of digital and social infrastructure that will connect society, enhance its resilience and increase its overall performance.
- Suggest that a transport assessment is undertaken.
- Consider impacts of new development on transport infrastructure (x5).

Swindon and Wiltshire Joint Spatial Framework Issues Paper

- 4.3 Appendix 12** summarises all the main themes raised in response to each question in the Swindon and Wiltshire Joint Spatial Framework Issues Paper. There were several strategic issues which were repeatedly raised and are highlighted below.
- 4.4** The JSF should be a statutory plan similar in approach to that of the West of England Partnership.
- 4.5** The JSF should have a longer time frame or at least a section of the JSF which addresses the long term vision for the combined geography of Swindon and Wiltshire to provide greater certainty for sites which will take many years to deliver and support funding needed to provide major infrastructure.
- 4.6** The timetable for work, which relates to the Government's requirement to review the adopted local plans within 5 years, is too ambitious given the anticipated draft amendments to the National Planning Policy Framework (NPPF)⁶ and proposals for a standard methodology to calculate objectively assessed need. The timetable does not allow sufficient time for consultation responses to the draft JSF consultation to inform the proposed site options consultation.
- 4.7** Notwithstanding the issue raised that the Councils should be using the standard methodology for calculating OAN, there is general support for the findings of the

⁶ The NPPF was revised in 2018. This report includes commentary relevant to the situation before the revised NPPF was published in July 2018

SHMA and the proposed HMAs with a few notable exceptions. Certain towns in Wiltshire are questioning their inclusion in a particular HMA. For example, Mere Town Council is questioning why the town has been identified in the Trowbridge HMA (rather than Salisbury HMA) and Melksham Town Council is questioning their inclusion in the Chippenham HMA (rather than Trowbridge HMA). There are also concerns about the split positioning of Malmesbury between Chippenham and Swindon HMAs.

- 4.8** Few comments challenge the outcome of the FEMAA although some consultees have asked for more detail to understand the technical work. However, there are some concerns that there is an unnecessarily cautious approach to employment growth at Swindon.
- 4.9** There is an inconsistency between the economic aspirations for the A303 FEMA and the housing provision for the Salisbury HMA. The concern is that this could lead to insufficient housing to meet the needs of workers.
- 4.10** There are many representations from planning consultants promoting development sites on behalf of land-owners or developer. These will be taken into consideration when considering specific site allocations later in the process.

5 Next Steps

- 5.1** At this stage in the process it is not expected that the Council will respond to every comment and issue raised in consultation. The purpose of the consultation was to invite comments on the scope of the review, including the preparation of a Joint Spatial Framework, and to consider how development across the Borough of Swindon and the Wiltshire Council area could take place.
- 5.2** Views submitted will inform the review process. As such comments submitted will inform:
- Amendments to the draft Sustainability Appraisal Scoping Report in response to comments before commencing the sustainability appraisal of policies and proposals.
 - A review of proposed housing market area boundaries especially in relation to Malmesbury, Melksham and Mere.
 - Consideration of the future role and status of the Joint Spatial Framework

- The development of alternative development strategies for each housing market area especially when considering whether a change to the current distribution strategy embedded within the Wiltshire Core Strategy is warranted.
- The understanding of site availability and deliverability when considering specific locations for allocations in the local plan.
- The review of adopted policies to maintain consistency and identify gaps in policy.

5.3 Future evidence papers which support the development of the Local Plan will make it clear where comments received during the Regulation 18 consultation have been considered and the consequence of those considerations.