



Wiltshire Local Plan Review

Scope of the Plan (Regulation 18 consultation)

Report of Consultation Process Appendices

Event:
November/December 2017

Report Published:
February 2019

Appendix 1 – Notification Letter

06 November 2017

Spatial Planning
Economic Development and
Planning
Wiltshire Council
County Hall
Bythesea Road
Trowbridge
Wiltshire
BA14 8JN

Our reference: 171107_WLPR

Dear Sir/Madam

Help shape Wiltshire's plans to 2036: Wiltshire Local Plan Review

The Council is reviewing the Wiltshire Core Strategy (adopted January 2015), which sets out planning policies for the development and use of land in the county over the period to 2026 and is used in the determination of planning applications. In future communications, this will be referred to as the Wiltshire Local Plan Review.

It is necessary to commence work on the review now to ensure that, in line with Government policy, we maintain an up to date plan for Wiltshire that plans over an appropriate timeframe for the new homes, jobs and infrastructure needed to support Wiltshire's communities while protecting the local environment.

We are seeking your views on the scope of the review and the issues the Council should consider in planning for the period to 2036. The review will involve the preparation of a Joint Spatial Framework with Swindon Borough Council. At this stage, no decisions have been made on the future locations for growth and development.

The following consultation documents have been prepared.

Wiltshire Local Plan Review: Consultation Paper

The consultation paper sets out the proposed scope of the Wiltshire Local Plan Review. It explains that the new homes, employment land and associated infrastructure needed to support growth over the period 2016 to 2036 are to be addressed in the review. It also considers: where an update of existing Wiltshire Core Strategy development management policies may be needed to ensure their continued consistency with Government national policy; how to consolidate older 'saved' policies from former Wiltshire district council local plans; and new policies to plan positively for town centres in Wiltshire.

Swindon and Wiltshire Joint Spatial Framework: Issues Paper

The Joint Spatial Framework is being prepared jointly with Swindon Borough Council and will guide the overall pattern of development across the wider area of the two councils, setting out the distribution of new jobs, homes and infrastructure. It will provide evidence to inform the councils' individual local plan reviews. The Issues Paper has been prepared to stimulate discussion early in the plan making process. It invites comments on the proposed methodology, scope and objectives of the Joint Spatial Framework and strategic issues in the proposed housing market areas. It is supported by profiles of the proposed new housing market areas at Chippenham, Salisbury, Swindon and Trowbridge. The document 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.

How to comment

The consultation runs from **9:00am on Tuesday 7 November 2017 until 5:00pm on Tuesday 19 December 2017**.

All the consultation documents and supporting evidence are available on this link:
<http://www.wiltshire.gov.uk/planning-policy-local-plan-review>

Copies of 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.

Comments can be returned via the following means:

- Online via the Council's dedicated consultation portal:
http://consult.wiltshire.gov.uk/portal/spatial_planning
- By email using the representation form available on the web site and returned to spatialplanningpolicy@wiltshire.gov.uk; or
- By post in writing to: Spatial Planning, Economic Development & Planning, Wiltshire Council, County Hall, Bythesea Road, Trowbridge, Wiltshire, BA14 8JN.

Should you require further information please phone spatial planning on 01225 713223 or email spatialplanningpolicy@wiltshire.gov.uk

Yours faithfully

Georgina Clampitt-Dix
Head of Spatial Planning
Economic Development and Planning
Wiltshire Council

Appendix 2 – Advance Notice Letter for Town and Parish Councils

26th October 2017

Spatial Planning
Economic Development and Planning
Wiltshire Council
County Hall
Bythesea Road
Trowbridge
Wiltshire
BA14 8JN

Your reference: LPRBriefing261016

Dear Sir/Madam

Help shape Wiltshire's plans to 2036

The Council is reviewing the Wiltshire Core Strategy adopted in January 2015 which identifies land for development for the period to 2026. A review is required as the Government encourages local planning authorities to review their Local Plans every five years, and in order to prepare the review in good time, it is necessary to commence work now. Following consideration of draft papers by Wiltshire Council's Cabinet on 10 October 2017 a consultation on the scope and content of the review is to start early November 2017. In the consultation we will be seeking the views of the local community on the issues the Council should consider in order to now plan for the period to 2036.

In advance of the start of the consultation we are writing to all parish and town councils to invite them to a briefing about the consultation. The briefing will explain the purpose of the consultation, the proposed approach to joint working with Swindon Borough Council and the conclusions of joint evidence papers commissioned on housing and employment needs. There will also be a discussion on the relationship of the review to neighbourhood planning. The event will be an opportunity to gain a better understanding of the process and how parish and town councils can become involved to inform how development is planned over the period to 2036.

In Wiltshire briefings are planned in four venues on different dates in November.

Town	Venue	Date in 2017	Please register by:
Trowbridge	Cotswolds Space, County Hall	Monday 13 November	8 November
Chippenham	Monkton Park	Thursday 16 November	13 November
Royal Wootton Bassett	Memorial Hall	Monday 20 November	15 November
Salisbury	Salisbury City Hall, Alamein Suite	Thursday 30 November	20 November

The agenda for each briefing will be the same. The event will take place between 6.30 and 8pm and commence with a briefing about the consultation followed by a period for discussion. Please arrive from 6pm to allow a prompt start at 6.30pm.

To help manage the event attendees must register their attendance in advance with the Council by the dates shown above. To do this please e-mail spatialplanningpolicy@wiltshire.gov.uk or phone 01225 713223. Please note that attendance is restricted to two representatives from each parish or town council. An additional place is available if you would like to also invite a representative of your local neighbourhood plan steering group where a neighbourhood plan is being prepared.

An additional briefing is being held in Swindon at the Sir Daniel Gooch Theatre, STEAM on Thursday 16 November 2017. Please note that this event will start at 6pm. The first part of the evening will follow the same format as the events planned in Wiltshire. For further information please contact Swindon Borough Council on 01793 466425 or e-mail kphimister@swindon.gov.uk.

Please be aware that this invitation is being sent out ahead of the start of the consultation on the scope of the local plan review to provide you with advance notice of the dates for the briefings. The consultation material will become available on the Council's web site on Tuesday 7 November 2017, which is the start date for the consultation. You will receive further information about the consultation closer to that time including information on how to submit your comments.

Should you require further information about the Wiltshire events please:

- phone spatial planning on 01225 713223
- email spatialplanningpolicy@wiltshire.gov.uk

Yours Faithfully

Georgina Clampitt-Dix

Head of Spatial Planning
Economic Development and Planning
Wiltshire Council

Appendix 3 – Parish Newsletter Text

Help shape Wiltshire's plans to 2036: Wiltshire Local Plan Review

Wiltshire Council has a statutory duty to plan for the new homes, jobs and infrastructure needed to support Wiltshire's communities while protecting the local environment and quality of life and to keep its plans up to date.

The council is reviewing the Wiltshire Core Strategy (adopted January 2015), which sets out planning policies for the development and use of land in the county over the period to 2026 and is used in the determination of planning applications. The review of the Wiltshire Core Strategy (renamed the Wiltshire Local Plan) will extend the period to which the plan relates to 2036.

The council is seeking the views of the Wiltshire 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. Consultation documents have been prepared to stimulate discussion and ask questions about the strategic issues to be considered in the review in relation to Chippenham, Salisbury and Trowbridge (as Wiltshire's principal settlements) and the market towns named in the core strategy.

This is your opportunity to inform the review of the local plan. The consultation starts on Tuesday 7 November 2017. All comments should be submitted by 5pm Tuesday 19 December 2017

For further information on how to submit your comments please visit the council's website where all the consultation documents and supporting evidence are available:

<http://www.wiltshire.gov.uk/planning-policy-local-plan-review>

We have previously advised there will also be four briefings for parish and town councils on the following dates.

Town	Venue	Date in 2017	Please register by:
Trowbridge	Cotswolds Space, County Hall	Monday 13 November	8 November
Chippenham	Monkton Park	Thursday 16 November	13 November
Royal Wootton Bassett	Memorial Hall	Monday 20 November	15 November
Salisbury	Salisbury City Hall, Alamein Suite	Thursday 30 November	20 November

To help manage the briefings, attendees must register their attendance in advance with the council by the dates shown above by emailing spatialplanningpolicy@wiltshire.gov.uk or phone 01225 713223. Please note that attendance is restricted to two representatives from each parish or town council. An additional place is available if you would like to also invite a representative of your local neighbourhood plan steering group where a neighbourhood plan is being prepared.

Should you require further information please phone spatial planning on 01225 713223 or email spatialplanningpolicy@wiltshire.gov.uk

Appendix 4 – Leaflet

How to comment

Copies of the consultation documents can 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.

The consultation runs from Tuesday 7 November 2017 until 5pm on Tuesday 19 December.

All the consultation documents and supporting evidence are available on this link:

<http://www.wiltshire.gov.uk/planning-policy-local-plan-review>

Comments can be returned via the following means:

- Online via the consultation portal (http://consult.wiltshire.gov.uk/portal/spatial_planning)
- By email via spatialplanningpolicy@wiltshire.gov.uk
- By post in writing to: Spatial Planning, Economic Development & Planning, Wiltshire Council, County Hall, Bythesea Road, Trowbridge, Wiltshire, BA14 8JN.

Next Steps

The feedback from this consultation will inform the development of a draft Joint Spatial Framework and draft options for the Wiltshire Local Plan Review. The timetable for each stage of public consultation is set out below.

Public Consultation

■ Joint working

■ Individual Local Plans

Issues and Opportunities Consultation (Nov - Dec 2017)

Draft Joint Spatial Framework (June - July 2018)

Local Plan Options Consultation (Oct - Dec 2018)

Local Plan Pre-submission Consultation (June - July 2019)

Independent Examination (Apr -Sep 2020)



Wiltshire Local Plan Review Consultation

Wiltshire Council has a statutory duty to plan for the new homes, jobs and infrastructure needed to support Wiltshire's communities while protecting the local environment and quality of life and to keep plans up to date.

The council is reviewing the Wiltshire Core Strategy adopted in January 2015 which sets out policies for the future development of the county over the period to 2026 and is used in the determination of planning applications. The review of the Wiltshire Core Strategy (renamed the Wiltshire Local Plan) will extend the period to which the plan relates to 2036.

This is your opportunity to comment on and inform how the review of the local plan takes place.

Comments on the consultation should be returned by 5pm Tuesday 19 December 2017.

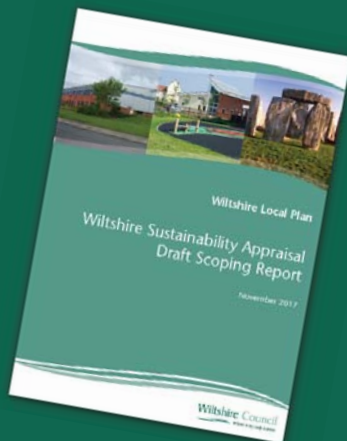
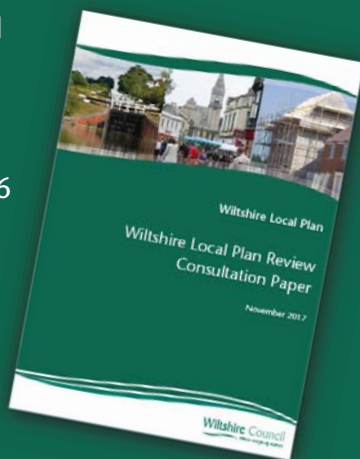
Wiltshire Local Plan Consultation Paper

The consultation paper sets out the proposed scope of the Wiltshire Local Plan Review. This explains that the new homes, employment land and associated infrastructure needed to support growth over the period 2016 to 2036 are to be addressed in the review.

It also considers: where Wiltshire Core Strategy development management policies may need to be updated to ensure their continued consistency with national policies; how to consolidate older 'saved' policies from former Wiltshire district council local plans; and new policies to plan positively for each town centre in Wiltshire.

Sustainability Appraisal Scoping Report

The Sustainability Appraisal Scoping Report 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. Sustainability Appraisal promotes sustainable development through better integration of sustainability considerations in the preparation and adoption of plans.



Call for sites

If you have land which you would like the council to consider for development please let us know. Sites already in the Wiltshire Housing and Employment Land Availability Assessment 2017 do not need to be submitted.

Swindon and Wiltshire Joint Spatial Framework

Local planning authorities are legally required to co-operate with each other over issues that transcend administrative boundaries. The Joint Spatial Framework, prepared jointly with Swindon Borough Council, will guide the overall pattern of development across the wider area of the two councils, setting out a distribution of new jobs, homes and infrastructure. It will provide evidence to inform the councils' individual local plan reviews.



Swindon and Wiltshire Joint Spatial Framework: Issues Paper

The Issues Paper has been prepared to stimulate discussion and invites comments on the proposed methodology, scope and objectives of the Joint Spatial Framework and strategic issues in the proposed housing market areas. It is supported by profiles of the proposed new housing market areas at **Chippenham, Salisbury, Swindon and Trowbridge**. The document includes specific questions on which the council would like to hear your views.



Assessments of need for homes and jobs (2016 to 2036)

Two independent studies have been commissioned to identify the new homes and jobs that may be required in Wiltshire and Swindon over the period to 2036 and to inform the review of the Swindon Borough

Local Plan and Wiltshire Local Plan. These are a Strategic Housing Market Assessment and A Functional Economic Market Area Assessment.

These projections have yet to be tested and are a first step in the local plan review process.

Appendix 5 – Press Notice Text

WILTSHIRE LOCAL PLAN REVIEW

Planning and Compulsory Purchase Act 2004 The Town and Country Planning (Local Development) (England) Regulations 2012 (Regulation 18)

Notice of intention to consult on the scope and content of the Wiltshire Local Plan Review, including the preparation of a Swindon and Wiltshire Joint Spatial Framework

Wiltshire Council intends to prepare a review of the current Wiltshire Core Strategy to be recast as the Wiltshire Local Plan (which relates to the whole administrative area of Wiltshire Council) to cover the period to 2036. The Wiltshire Local Plan outlines a sustainable spatial strategy for future development in the county and sets out detailed planning policies for determining planning applications.

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

The proposed scope of the plan will also consider where an update of existing Wiltshire Core Strategy development management policies may be needed to ensure their continued consistency with national policy; how to consolidate policies from former Wiltshire district council local plans; and bespoke policies to plan positively for each town centre in Wiltshire.

The Council is seeking the views of the Wiltshire community on the scope of the review, including the preparation of a Joint Spatial Framework to coordinate development across the Borough of Swindon and the Wiltshire Council area.

Environmental Assessment of Plans and Programmes Regulations 2004 Sustainability Appraisal Scoping Report

At this stage, the Council is legally required to consult statutory consultees as defined by Regulation 4 of the Environmental Assessment of Plans and Programmes Regulations 2004 but have widened the consultation to seek the views of the Wiltshire Community in line with Wiltshire Council's Statement of Community Involvement adopted July 2015.

Consultation Arrangements

Comments on the consultation documents which include the Wiltshire Local Plan Consultation Paper, Swindon and Wiltshire Joint Spatial Framework Issues Paper (prepared with Swindon Borough Council) and the Sustainability Appraisal Scoping Report should be submitted during the consultation period, running from **9:00am on 7 November 2017** and lasting for 6 weeks, closing at **5:00pm on 19 December 2017**. Representations received beyond this date may not be considered.

All documents are available to view at <http://www.wiltshire.gov.uk/planning-policy-local-plan-review> and at the following locations during normal opening hours: the council's main offices at Monkton Park (Chippenham), Bourne Hill (Salisbury) and County Hall (Trowbridge); and in all Wiltshire Council libraries

Representations can be submitted online via <http://consult.wiltshire.gov.uk/portal> or emailed to spatialplanningpolicy@wiltshire.gov.uk. Alternatively, please send your representations to: Spatial Planning, Economic Development and Planning, Wiltshire Council, County Hall, Trowbridge, BA14 8JD.

Mike Wilmott
Acting Director Economic Development and Planning
Wiltshire Council

Appendix 6 – Representation Form

Wiltshire Local Plan Review Scope of the Plan Consultation 2017

Response form for comments

Ref:	(For official use only)
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Please return to Wiltshire Council by 5:00pm on 19 December 2017.

By post to: Spatial Planning, Economic Development and Planning, Wiltshire Council,
County Hall, Bythesea Road, Trowbridge, Wiltshire, BA14 8JN.

By e-mail to: spatialplanningpolicy@wiltshire.gov.uk

Tel: 01225 713223 **Website:** <http://www.wiltshire.gov.uk/planning-policy-local-plan-review>

This form has two parts: Part A – Personal details
 Part B – Your representation(s).

Please use a separate sheet for each representation.

Part A – Personal details

	1. Personal details	2. Agent's details (if applicable)*
Title		
First name		
Last name		
Job title (where relevant)		
Organisation (where relevant)		
Address Line 1		
Address Line 2		
Address Line 3		
Postcode		
Telephone Number		
Email Address		

*if an agent is appointed, please fill in your Title, Name and Organisation but the full contact details of the agent must be completed.


Part B – Please use a separate sheet for each comment

1. To which part of the Wiltshire Local Plan Review Consultation does this representation relate?

Document:	
Question number:	Paragraph number*:
Housing Market Area (HMA)*:	Settlement*:

* Leave blank if not applicable

2. Please explain your answer below, providing as much detail as possible.



(Please continue on a separate sheet if necessary)

Do you wish to be notified of future consultations relating to the Wiltshire Local Plan Review?

YES ☐ NO ☐

Do you consent to the comments form you are submitting in relation to the Swindon and Wiltshire Joint Spatial Framework being shared with Swindon Borough Council to enable all representations on the jointly prepared document to be taken into account?

YES ☐ NO ☐

Signature:		Date:	
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Appendix 7 – Example of Chairman’s Announcement

Chairs Announcement at Area Board

Help shape Wiltshire's plans to 2036 : Wiltshire Local Plan Review

Wiltshire Council has a statutory duty to plan for the new homes, jobs and infrastructure needed to support Wiltshire's communities while protecting the local environment and quality of life and to keep its plans up to date.

The Council is reviewing the Wiltshire Core Strategy adopted in January 2015 which sets out policies for the future development of the county over the period to 2026 and is used in the determination of planning applications. The review of the Wiltshire Core Strategy (renamed the Wiltshire Local Plan) will extend the period to which the plan relates to 2036.

This is your opportunity to inform the review of the local plan. The consultation starts on Tuesday 7 November 2017. All comments should be submitted by 5pm Tuesday 19 December 2017

The Council is seeking the views of the Wiltshire 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. Consultation documents have been prepared to stimulate discussion and ask questions about the strategic issues to be considered in the review in relation to Chippenham, Salisbury and Trowbridge (as Wiltshire's principal settlements) and the market towns named in the core strategy.

For example, in relation to Amesbury, the consultation documents include information about the recent rate of house building (including affordable housing), employment change and environmental constraints. The Amesbury, Bulford and Durrington profile acknowledges that:

- The area is a focus for investment containing two recognised business clusters with significant potential for job growth.
- Amesbury is the dominant focus for housing development.
- The trading position of the town centre needs consolidation.
- Environmental designations may be a constraint on development.

And asks the questions:

- What more can be done to improve the range of services to improve the attractiveness of the area?
- Should planning for Amesbury be distinct to planning for Bulford and Durrington?
- How should the area capitalise on business investment? What amount of further housing is appropriate?

All the consultation documents and supporting evidence will be available on the Council's web site from the 7th (<http://www.wiltshire.gov.uk/planning-policy-local-plan-review>) and are available to view 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.

There is also leaflet available on the information table if you would like to know more about the content of the consultation

Appendix 8 – Our Community Matters Example Webpage



Help shape Wiltshire's plans to 2036 : Wiltshire Local Plan Review

16 November 2017



Wiltshire Council has a statutory duty to plan for the new homes, jobs and infrastructure needed to support Wiltshire's communities while protecting the local environment and quality of life and to keep it's plans up to date.

The Council is reviewing the Wiltshire Core Strategy adopted in January 2015 which sets out policies for the future development of the county over the period to 2026 and is used in the determination of planning applications. The review of the Wiltshire Core Strategy (renamed the Wiltshire Local Plan) will extend the period to which the plan relates to 2036.

This is your opportunity to inform the review of the local plan. The consultation starts on Tuesday 7 November 2017. All comments should be submitted by 5pm Tuesday 19 December 2017

The Council is seeking the views of the Wiltshire 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. Consultation documents have been prepared to stimulate discussion and ask questions about the strategic issues to be considered in the review in relation to Chippenham, Salisbury and Trowbridge (as Wiltshire's principal settlements) and the market towns named in the core strategy.

For example, in relation to Westbury, the consultation documents include information about the recent rate of house building (including affordable housing), employment change and environmental constraints. The Westbury profile acknowledges that:

- The rate of housing development has slowed as intended although there is land already committed that could exceed the Wiltshire Core Strategy indicative requirement if it was all developed by 2026.
- Employment land provision has played a strategic role whilst development in Trowbridge has been delayed.
- Improvements within the town, around the railway and to the town centre have not yet taken place.
- The potential for development around the town is comparatively unimpeded by environmental constraints.

And asks the questions:

- Should Westbury become a greater focus for growth or maintain a strategy of consolidation?
- How can improvements to the town centre and around the railway station be brought forward? What other measures could enhance the vitality and viability of the town centre and improve local infrastructure?

All the consultation documents and supporting evidence will be available on the Councils web site from the 7th (<http://www.wiltshire.gov.uk/planning-policy-local-plan-review/>) and are available to view 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.

Report this

If you feel this post is unsuitable or offensive, report it to us

If you'd like to share this post...



Written by [davidholker](#)

Post a comment

You must be [logged in](#) to post a comment.

Alcohol Awareness Week 2017

Sovereign Housing Community Walkabout and Meeting - Tues 21st Nov



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Get involved campaign

Find out about the

#Getinvolvedcampaign and the improvements Wiltshire Council have made to Wiltshire.

Get involved campaign

Tweets by @WestburyCEM

Liam Cripps @WestburyCEM

A fantastic local project supported with #Areaboard funding. Great to see it finally finished and open for use! #ActiveWiltshire

Embed

View on Twitter

Tweets by @wiltscouncil

Wiltshire Council @wiltscouncil

We want your views on exciting proposals to redevelop and enhance the #Chippenham Railway Station area. Make your voice heard at our consultation drop-in event on Wed 22 Nov from 11-7pm at the Town Hall in #Chippenham. [View full details](#)

Embed

View on Twitter

Appendix 9 – WISEnet Letter

6th November 2017

Children's Services
County Hall
Bythesea Road
Trowbridge
Wiltshire
BA14 8JN

LA Circ: A217/17

Our Ref.: 171107_WLPR

Dear Sir/Madam

Help shape Wiltshire's plans to 2036: Wiltshire Local Plan Review

Wiltshire Council has a statutory duty to plan for the new homes, jobs and infrastructure needed to support Wiltshire's communities while protecting the local environment and quality of life and to keep its plans up to date.

The council is reviewing the Wiltshire Core Strategy (adopted January 2015), which sets out planning policies for the development and use of land in the county over the period to 2026 and is used in the determination of planning applications. The review of the Wiltshire Core Strategy (renamed the Wiltshire Local Plan) will extend the period to which the plan relates to 2036.

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This is your opportunity to inform the review of the local plan. The consultation starts on Tuesday 7 November 2017. All comments should be submitted by 5pm Tuesday 19 December 2017

For further information on how to submit your comments please visit the council's website where all the consultation documents and supporting evidence are available:

<http://www.wiltshire.gov.uk/planning-policy-local-plan-review>

Yours faithfully,

Georgina Clampitt-Dix

Head of Spatial Planning
Economic Development and Planning

01225 13223
spatialplanningpolicy@wiltshire.gov.uk

Appendix 10 – Developer Forum Invite

Dear Sir/Madam,

Swindon Borough and Wiltshire Council Local Plan Reviews 2016 to 2036
Invite to developers forum - 13 December 2017

Swindon Borough Council and Wiltshire Council are reviewing their respective Local Plans to cover the period 2016 - 2036. This involves both Councils working together and the preparation of a Joint Spatial Framework - a non-statutory strategy setting the context for each Plan. Consultation on the scope and content of the review started on 7 November 2017. Further information can be found on our respective webpages ([Swindon Borough Council](#), [Wiltshire Council](#)) and comments are invited via the consultation portals, links to which can be found on the webpages.

We would like to invite you to attend a forum involving housing and commercial developers to be held on Wednesday 13 December 2017 at the Town Hall, High Street, Chippenham, BA15 3ER.

The purpose of the forum is to provide an overview of the proposed approach to joint working and joint evidence on the housing and employment needs. We will also be seeking your views on the issues raised and ideas on the way forward, particularly with regard to the local and national context.

The event will take place between 9.30am and 11am. Please arrive from 9am to allow a prompt start at 9.30am.

There has been a high demand for places at previous events. Attendance is restricted to one representative from each organisation and to help manage the event attendees must register their attendance by 11 December. To do this please e-mail spatialplanningpolicy@wiltshire.gov.uk or phone 01225 713223.

Yours faithfully,

Georgina Clampitt-Dix

Head of Spatial Planning
Economic Development and Planning
Wiltshire Council

Appendix 11 – Statutory Consultee Letter

06 November 2017

Spatial Planning
Economic Development and Planning
Wiltshire Council
County Hall
Bythesea Road
Trowbridge
Wiltshire
BA14 8JN

Our reference: 171107_WLPR

Dear Sir/Madam

Help shape Wiltshire's plans to 2036: Wiltshire Local Plan Review

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It is necessary to commence work on the review now to ensure that, in line with Government policy, we maintain an up to date plan for Wiltshire that plans over an appropriate timeframe for the new homes, jobs and infrastructure needed to support Wiltshire's communities while protecting the local environment.

We are seeking your views on the scope of the review and the issues the Council should consider in planning for the period to 2036. The review will involve the preparation of a Joint Spatial Framework with Swindon Borough Council. At this stage, no decisions have been made on the future locations for growth and development.

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Swindon and Wiltshire Joint Spatial Framework: Issues Paper

The Joint Spatial Framework is being prepared jointly with Swindon Borough Council and will guide the overall pattern of development across the wider area of the two councils,

setting out the distribution of new jobs, homes and infrastructure. It will provide evidence to inform the councils' individual local plan reviews. The Issues Paper has been prepared to stimulate discussion early in the plan making process. It invites comments on the proposed methodology, scope and objectives of the Joint Spatial Framework and strategic issues in the proposed housing market areas. It is supported by profiles of the proposed new housing market areas at Chippenham, Salisbury, Swindon and Trowbridge. The document 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.

As a statutory consultation body under paragraph 4 of the Environmental Assessment of Plans and Programmes Regulations 2004, I write to invite your comments on the above documents that the council has published for consultation along with accompanying evidence reports.

How to comment

The consultation runs from **9:00am on Tuesday 7 November 2017 until 5:00pm on Tuesday 19 December 2017**.

All the consultation documents and supporting evidence are available on this link:
<http://www.wiltshire.gov.uk/planning-policy-local-plan-review>

Copies of 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.

Comments can be returned via the following means:

- Online via the Council's dedicated consultation portal:
http://consult.wiltshire.gov.uk/portal/spatial_planning
- By email using the representation form available on the web site and returned to spatialplanningpolicy@wiltshire.gov.uk; or
- By post in writing to: Spatial Planning, Economic Development & Planning, Wiltshire Council, County Hall, Bythesea Road, Trowbridge, Wiltshire, BA14 8JN.

Should you require further information please phone spatial planning on 01225 713223 or email spatialplanningpolicy@wiltshire.gov.uk

Yours faithfully

Georgina Clampitt-Dix
Head of Spatial Planning
Economic Development and Planning
Wiltshire Council

Appendix 12 – Summary of comments made to the Swindon and Wiltshire Joint Spatial Framework

Question 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.

1.1 Status of the JSF: Should be a statutory plan

As a non-statutory document there would be the following issues:

- Lack of transparency and thorough, robust examination
- Plan will not have sufficient weight
- No requirement to comply with test of soundness

1.2 Status of the JSF: As a non-statutory plan

In order for the JSF to be successful as a non-statutory document, the following should be considered:

- It should only focus on dealing with the cross-boundary matter of apportioning development between the two authorities
- Both councils' development plans should be wholly aligned
- Local Plan process should clearly evidence the decisions that have been reached

1.3 Status of the JSF: Lack of clarity

Confusion over whether the JSF would be a development plan document, an evidence document or a non-statutory plan taking the role of a local plan.

1.4 Association between housing and employment

It is inappropriate to identify strategic employment locations and not provide any commensurate form of guidance on the location of housing.

Both councils' plans should contain policies for phasing to ensure that there are enough jobs for the number of houses.

1.5 Need for 5-year supply of housing

There is insufficient scope in the JSF regarding the issue of maintaining a five-year housing land supply.

1.6 Clarity and content of the JSF

Confusion regarding:

- The use of the term "broad locations"
- The decision-making process
- Use of acronyms
- The number of documents being prepared at the same time – JSF, local plan review, site allocations plans

1.7 Duty to Cooperate

Need to consider the influences and intentions of other neighbouring authorities. Cross-boundary movement should be mentioned.

1.8 Support for cross boundary working

Cross-boundary working between Swindon Borough Council and Wiltshire Council is strongly supported due to:

- Long-established physical and functional relationship between the two councils
- Reflects government objectives to work 'cross boundaries' on strategic issues
- Recognises interconnectedness of the two authority areas

1.9 Concerns with cross boundary working

No common ground between Wiltshire and Swindon. JSF will lead to delays.

1.10 Statement of Common Ground

Important for the Councils to closely monitor the requirement for Statements of Common Ground.

1.11 Digital Infrastructure (Chippenham HMA: Corsham)

A broader definition of infrastructure should be inserted into the scope of the JSF to make it clear that it also includes emerging types of digital and social infrastructure.

1.12 Housing Delivery and OAN

The consultation should have included information on the proposed standardised methodology and how this could affect the scale and distribution of homes needed across the JSF area.

The interaction between FEMA and OAN should be approached cautiously as locations where there is a demand for housing do not always tie up with locations where there is demand for employment.

Housing supply should be based upon OAN plus flexibility. Concern that the JSF would set out a quantum of development that does not meet the full OAN.

1.13 Timetable

Concerns regarding the alignment of the JSF, respective Local Plan reviews and other development plan documents include:

- Confusion over why the JSF is planned to identify broad locations for development after the Local Plan Review selects preferred sites.
- WLPR suggests a different time horizon to the JSF.
- JSF should come first with the Local Plans taking it into account.
- Confusion over the overlap of different document preparations including the WHSAP and SHELAA.

- Risk of a conjoined examination becoming impossible if the proposed timetables fall out of line.

Other comments include:

- New standardised methodology will lead to a need for updating any supporting evidence
- Would be useful to see how the 11-stage programme of work fits into the timetable
- Question whether 3 months is sufficient time to carry out both SA and SWOT (Step 5 of programme of work) of alternative development strategies

1.14 Consultation

Concerns regarding the consultation process include:

- Length of consultation was too short
- Presentation of material was not clear
- The JSF is not being carried out in accordance with Statement of Community Involvement (SCI)
- The consultation gives rise to the receipt of biased opinions i.e. those opposed to growth or any form of development within specific areas
- Limited amount of consultations will lead to limited input from the key stakeholders required to deliver it
- Premature to consult on processes prior to there being an objectively assessed housing and employment requirement which has been tested formally through examination

1.15 Strategic Vision

The scope of the JSF should include consideration of a strategic vision for the region beyond the immediate plan period (up to 2036) particularly for infrastructure provision. This will improve prospects of being able to plan and fund suitable infrastructure to support the growth aspirations of the region.

1.16 Strategic Road Network

Plan needs to be supported by an assessment of the infrastructure needed to ensure traffic impacts are not severe. Transport mitigation needs to be identified and agreed within the plan.

1.17 Retail

The JSF should set out the broad locations for additional retail development to meet local requirements, and meet the needs of the existing and future residential and employment locations choices.

1.18 Proposed plan period

The proposed plan period from 2016 to 2036 is insufficient due to the need for another review soon after adoption and due to many infrastructure providers working to much longer timeframes. The timescale should be extended to 2050.

1.19 Evidence

It is difficult to comment about the proposed scope without the essential updated evidence base being available for interrogation.

1.20 Evidence (environment)

Identification of broad locations for development needs to be based on a proportionate evidence base, including environmental evidence.

1.21 Evidence (housing)

It will be crucial for the councils to ensure that the housing needs evidence is consistent across the two plans.

1.22 Evidence (transport)

Development strategy needs to be informed by a transport evidence base. Development should be focused in locations that are sustainable or can be made sustainable and that patterns of growth and significant development should be actively managed to make the fullest possible use of sustainable transport modes.

1.23 Green Belt

JSF should include a comprehensive review of the Green Belt.

1.24 Infrastructure

Infrastructure delivery is necessary to support the level of growth required. JSF should also cover the interrelationship between growth and infrastructure to resolve current transportation inadequacies.

1.25 Affordable housing

Scope should give some direction on the types and scale of affordable housing delivery across the joint area.

A step change is required to deliver greater numbers of affordable housing of the right types to free up housing to better meet priority needs.

An affordable housing strategy should be defined in the JSF.

1.26 Employment

View on employment taken is too narrow in that it relates solely to quantifiable employment land requirement and distribution. A more holistic view should be taken which would recognise and support existing clusters of established sectors that require a supportive policy context.

Scope does not include how it is going to make up the number of jobs that were supposed to have been provided since 2006 and the number of affordable and social rented houses delivered that has fallen short of what is needed.

Disagree with assumption that a theoretical alignment of jobs and workers delivers.

1.27 Enforcement

Limited influence over developers and employers.

1.28 Additional considerations for scope of the JSF

Request for the JSF to consider the following factors:

- The housing needs of all people, particularly older people
- Infrastructure to maintain the resilience of communities from the effects of flooding
- Consideration to supporting and/or delivering the proposed restoration of the Wilts & Berks Canal in both Swindon and Wiltshire
- Nationally important landscape and environmental issues
- Community facilities
- The importance of cultural heritage
- The importance of Neighbourhood Plans

1.29 Distribution of growth

Broad locations of development should be decided on where Swindon and Wiltshire Local Enterprise Partnership (SWLEP) is funding infrastructure.

JSF should be clear about where the direction of growth for individual settlements.

1.30 Brownfield Land

Policy is needed to ensure that brownfield sites are redeveloped before more greenfield sites are permitted.

1.31 Boundaries

The restrictive nature of administrative boundaries used to define Principal Settlements and Community Areas in the Wiltshire Core Strategy is not promoting sustainable patterns of development at some of the settlements.

1.32 Interaction with Local Plans

Scope should be extended so that it also deals with both local plan reviews.

Both authorities should discuss preliminary arrangements for a combined examination of both Local Plans insofar that the matters discussed are ultimately informed by the JSF.

1.33 Housing allocations

The JSF should identify strategic housing locations in order to apply a consistent approach to development. If strategic sites were identified this would provide investors/infrastructure providers with an early indication on where development could go.

1.34 Geographical consideration of the JSF

Wiltshire Council should broaden the geographical consideration of the Local Plan Review and JSF to incorporate the functioning river catchments that Wiltshire is part of including the Bristol Avon Catchment.

1.35 Sustainability Appraisal (SA)

Broad locations for growth must be subject to SA if they are going to be used as a basis for site searches.

The SA process must consider 'all reasonable alternatives' including different spatial strategies for accommodating growth within each HMA and must be subject to consultation as part of the local plan making process.

1.36 SHMA comments

Objections to the placement of the following:

- Marlborough Area Neighbourhood Plan area within the Swindon HMA
- Royal Wootton Bassett should in the same HMA as Swindon
- Mere in the Trowbridge HMA
- Melksham in the Chippenham HMA

Swindon HMA and Swindon Borough Council boundaries do not coincide. Clarity needed on the implications for the calculations and distribution of housing.

Support for the inclusion of the eastern fringe of Wiltshire within the Swindon HMA.

1.37 Wiltshire Housing Site Allocation Plan comments

Comments on the suitability of land put forward in the draft Wiltshire Housing Site Allocations Plan (WHSAP).

Question 2: Do you agree with the objectives for the Swindon and Wiltshire Joint Spatial Framework as set out below? If not, please describe how they should be changed.

2.1 Definitions

Need to define:

- "net out commuting"
- "resilient communities"
- "active travel"
- "unacceptable pressures"

2.2 Clarity and role of objectives

Clarity needed on the prioritisation of objectives, how they were derived and how they will be used.

2.3 Settlement hierarchy review

Support the review of the settlement hierarchy and suggestions of a more dynamic approach, including 'bespoke' hierarchies within each HMA.

2.4 Accommodating HMA housing needs

Contrasting views on how unmet housing need should be met in HMAs.

2.5 Strategic objectives alignment with local plans

Emphasis that the strategic objectives must be aligned with the Local Plans.

2.6 Heritage

Must be given sufficient weight.

2.7 Protection of agricultural land

Whilst the protection of agricultural land was welcomed by some, others argued that Objective 4 stating “respect and enhance...best agricultural land” is contrary to the NPPF.

Confusion over how ‘respect and enhance’ would be applied to agricultural land quality.

2.8 Objective 1: Housing

Suggested amendments to the objective include:

- Minor word changes
- Considering wider functional relationships and potential unmet needs of adjoining authorities
- Directing growth to the most sustainable locations
- Emphasising on addressing OAN and making clear that the JSF is required to distribute all of Swindon and Wiltshire’s housing need
- Reflecting on the potential for supporting infrastructure to be delivered as part of new developments

2.9 Objective 2: Economy

Suggested amendments to the objective include:

- Minor word changes
- Identifying tourism as a major economic factor
- Reflecting ambitions of the Swindon and Wiltshire Local Enterprise Partnership (SWLEP)
- Recognising areas which remain a focus for economic growth
- Supporting sustainable growth of rural based enterprises
- Recognising importance of retail facilities
- Recognising importance of an employment led approach

2.10 Objective 3: Resilient communities

Suggested amendments to the objective include:

- Minor word changes
- Need for definition of the word “resilient”
- Include mention of delivering necessary missing infrastructure
- Referencing the provision of homes and jobs

<ul style="list-style-type: none"> • Recognising the role of discount food store operators to provide local economies and communities
<p>2.11 Objective 4: Environment</p> <p>Suggested amendments to the objective include:</p> <ul style="list-style-type: none"> • Minor word changes • Including reference to climate change and air quality, Green Belt, non-designated heritage, rivers and streams, value of the green environment not including nationally designated landscapes and increased recreational impact on designated sites
<p>2.12 Objective 5: Accessibility and transport</p> <p>Suggested amendments to the objective include:</p> <ul style="list-style-type: none"> • Minor word changes • Including reference to the Local Transport Plan, health benefits of active travel, net out-commuting and reducing trip frequency and length, and the LEP Strategic Plan • Including a hierarchical approach – emphasis on walking, cycling, then public transport
<p>2.13 Additional objective</p> <p>Suggestions for a sixth objective included:</p> <ul style="list-style-type: none"> • Digitisation and knowledge • Supporting a prosperous rural economy • Promoting healthy communities • Planning for climate change
<p>2.14 Duty to Cooperate</p> <p>JSF exceeds the essential purpose of the document to facilitate the discharge of the Duty to Cooperate and encroaches on matters that are within the remit of the individual plans which are subject to examination.</p>
<p>2.15 Climate Change</p> <p>Important to address risks and opportunities and how the region will build developments and infrastructure that are adaptive to climate change impacts to help support the delivery of resilient communities.</p>
<p>2.16 Internal and external cross-boundary relationships</p> <p>Concern over how the strategy will operate in each authority.</p> <p>Need to consider cross boundary requirements</p>
<p>2.17 Green Belt</p> <p>Differing opinion of whether the Green Belt should be reviewed.</p>

2.18 Swindon HMA

Comments relating specifically to the Swindon HMA included:

- Being against urban extensions at Swindon
- There being a need for smaller, more deliverable sites in the HMA
- Reconsidering the role of Swindon
- Considering the role of larger rural villages in being able to meet housing need

2.19 Salisbury HMA

Support for sustainable growth at Salisbury.

2.20 Status of the JSF: Non-statutory plan

Concern over whether the objectives will be achieved and how joint working can be ensured if the JSF is non-statutory.

2.21: End date of the plan

Achievement and delivery of objectives may be compromised by not planning to 2050.

2.22 Housing and infrastructure

Housing and employment development should be located where there is existing infrastructure. Support for maximising opportunities for public transport. Need for the recognition of the positive contribution of development that delivers new or enhanced infrastructure.

2.23 Calculation of housing need

Suggestions for assessing housing need include:

- Calculating full OAN in line with NPPF guidance
- Undertaking analysis of housing need on a settlement by settlement basis
- Assessment should include detailed discussions with local providers of housing, including affordable housing
- Adoption of a 'policy on' position with regards to economic growth in housing requirement calculations

2.24 Tourism and leisure

Tourism and leisure should have a separate objective. The enhancement of existing areas of tourism and leisure facilities should be supported given their contribution to local and regional economies.

2.25 Other transport comments

Road and rail links in north/south Wiltshire are of poor quality and require improvement to improve air quality in the settlements.

2.26 Water

Request for a stronger desire to protect rivers, stream and the wider water environment.

2.27 Recreation/Green Infrastructure

Request for inclusion on how existing and new green infrastructure can be set out strategically within the JSF.

Possible recreational impacts on Special Areas of Conservation (SACs) should be looked at in the Habitat Regulations Assessment (HRA).

2.28 Community Infrastructure/Policies

Part of a resilient community is having a population which can support the viability of community infrastructure/facilities. JSF should assess the degree to which housing growth at rural settlements can help to support local services and facilities.

Need to reflect and support implementation of locally based initiatives.

Question 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?

3.1: SHMA to be reviewed (standard methodology)

The SHMA should be reviewed by adopting the government's proposed standardised methodology of housing need assessment.

3.2 SHMA to be reviewed (base date)

Latest demographic data required. Queries over how vacancy rates have been derived, and if there is an adequate element for second home ownership.

3.3 SHMA to be reviewed (upward adjustment)

Additional uplifts to objectively assessed housing need (OAHN) in the SHMA are deemed inadequate. There are insufficient homes to deal with either economic growth or affordable need – notably given the LEP commitment to economic growth.

3.4 SHMA to be reviewed (shortfall)

Clarity needed on the robustness of writing off the shortfall at the start of the SHMA period. In light of the shortfall in the West and North HMA the uplift should be greater than 5% and should be more in line with that for Salisbury of 15%.

3.5 Labour supply and OAHN

SHMA does not take account of out-commuting from Wiltshire, and the OAHN would rise further if the calculation considered the economically active at an earlier stage. The economically active population uses data from 2011; more up to date information is available.

3.6 SHMA: spatial level of analysis

Housing need statistics should be broken down to a smaller spatial area in order to provide a clearer picture of where local demand varies.

3.7 Exceeding Standardised Method calculation

The emerging Standardised Method for housing need calculation states that such a number could be exceeded, and whether this would be the intention of the joint

authorities. There will be scope to exceed the standardised method calculation to allow for policy to deal with localised economic growth plans.

3.8 Affordable housing (calculation)

If 27,000 dwellings for Swindon and 44,000 dwellings in Wiltshire split is what happens, the indicated need for 14,376 affordable units does not equate to 36.9% of overall provision.

3.9 Affordable housing (rent-to-buy)

Need for mention on assisting homeownership.

3.10 SHMA out of date

SHMA out of date owing to use of 2011 census for demographic assumptions.

3.11 Clarity on HMA/FEMA overlaps and planning

Little consistency between the three FEMAs and the four HMAs in terms of boundary and overlap. It is unclear how to plan for housing and jobs in two different ways, over two different geographies.

3.12 Splitting parish areas between HMAs

Unclear the rationale for splitting parish areas between different HMAs, and the new HMA map is unclear and will need to show parish boundaries.

3.13 Market housing requirement

Queries over the amount of market housing needed when excluding affordable housing.

3.14 Chippenham HMA: Residual housing need

Unclear how the HMA will accommodate residual need as it is currently behind delivery rates. Matter compounded by revised HMA boundaries.

3.15 Chippenham HMA: West of England/Bath overspill effect

Concern that the OAHN for the Chippenham HMA has been underestimated as it does not take account of West of England overspill, mainly arising from Bath's inability to accommodate own housing need owing to constraints.

3.16 Chippenham HMA: GWR electrification

It is argued that Great Western Railway (GWR) electrification as far as Chippenham will lead to greater demand for homes in this HMA than articulated by the SHMA.

3.17 Chippenham HMA: Chippenham penalised

Concern that a disproportionate quantum of homes compared to surrounding HMAs, added to lack of local jobs, will make Chippenham unsustainable.

3.18 Chippenham HMA: Corsham penalised

Corsham has taken a disproportionate amount of growth and new development would be best directed at Chippenham as opposed to the smaller towns in the HMA.

3.19 Chippenham HMA: Worton Neighbourhood Plan and change of HMA

Worton will potentially be relocated into the Chippenham HMA from the East Wiltshire area. This has led to the Neighbourhood Plan group coming under greater speculative pressure from developers since the housing requirement is greater.
3.20 Chippenham HMA: Pewsey – change of HMA Pewsey does not wish to take any further housing prior to 2026, to compensate for other areas that under-deliver. It is felt that residents do not work in Chippenham HMA, tending rather more to head north, south and east for work.
3.21 Chippenham HMA: Traffic Concerns at traffic stress upon infrastructure given new housing requirement.
3.22 Chippenham HMA/Trowbridge HMA: Melksham – choice of HMA Melksham has been placed within Chippenham HMA and, as a result, has greater new housing pressures.
3.23 Trowbridge HMA: Mere – change of HMA Query as to why Mere has been included in Trowbridge HMA when locally there is a feeling that they should remain within Salisbury HMA. Mere would come under greater housing pressure within Trowbridge HMA than within Salisbury.
3.24 Trowbridge HMA: relationship with Frome Whilst the HMAs identified are best fit it will be important that relevant LPAs deal with cross borders e.g. Frome that interact with the Trowbridge HMA.
3.25 Trowbridge HMA: Brexit No mention is made on Brexit and how future growth will be affected.
3.26 Salisbury HMA – Labour force and commuting assumptions The SHMA assumes commuting from Trowbridge and Chippenham HMAs to provide for an adequate labour force in Salisbury HMA. This is deemed unsustainable and contrary to PPG and JSF Objective 5. It may also not transpire given the greater economic pulling power of the wider northern area and its links to the West of England.
3.27 Salisbury HMA: Tidworth and Ludgershall Objection to ‘best fit’ apportionment of Tidworth and Ludgershall (Andover HMA) to Salisbury HMA. Should be jointly planned under the DtC with Test Valley.
3.28 Salisbury HMA: Residual requirement and WHSAP The residual housing requirement for the Salisbury HMA could become a problem in the event that the Wiltshire Housing Site Allocations Plan (WHSAP) cannot be adopted.
3.29 Salisbury HMA: New Forest within Salisbury HMA Reinstate, as per supporting documentation, those parts of the New Forest administrative area that effectively lie within Salisbury HMA.
3.30 Salisbury HMA: MoD housing

Currently in Salisbury HMA a number of developments of military housing are under construction or proposed. It is unclear whether these have been included.
3.31 Salisbury HMA: Small residual housing requirement <p>The small residual housing requirement for Salisbury HMA represents an opportunity missed in an area which could cope with and benefit from further growth.</p>
3.32 Swindon HMA: Split between Borough and Rest of the HMA <p>The Issues Paper implies that some 27,000 dwellings are expected to be located within Swindon Borough. This is pre-determines the spatial strategy, whereby growth may well go beyond the administrative boundary.</p>
3.33 Swindon HMA: Swindon household projections <p>The SHMA indicates that baseline household projections for the Swindon HMA are lower than the figure for Swindon Borough.</p>
3.34 Swindon HMA: Projected housing growth <p>Projected housing need for the Swindon HMA appears low, and the area could provide for more. It is considered that the assessed need for Swindon is less than economic & affordable housing aspirations would require.</p>
3.35 Swindon HMA: Availability of technical evidence <p>Technical evidence appears unavailable on either Local Authority's website.</p>
Question 4: The Functional Economic Market Area Assessment (FEMAA) presents technical evidence of the projected level of need for employment land in the period 2016 to 2036. Do you have any comments on the findings of the FEMAA?
4.1 New housing should be delivered where the jobs are <p>New housing should be delivered in step with new employment land.</p>
4.2 Swindon/M4 FEMA: approach to employment growth at Swindon <p>The number of jobs which are to be created within the Swindon FEMA appears very low. It is questioned why the A350 FEMA should have as many job and more office and industrial allocation than the Swindon FEMA.</p> <p>Concern that the relatively low employment growth is linked to relatively low housing delivery rates at Swindon.</p>
4.3 Swindon/M4 FEMA – place-specific comments <p>Welcome the inclusion of land to the west of Swindon within the Wiltshire authority area as being within the Swindon FEMAA as the reach of Swindon as a location for economic activity is greater than simply the Borough's administrative boundary. Because of the relative shortage of suitable employment sites within the administrative area of Swindon Borough, consideration may well need to be given in the future to the identification of suitable employment sites within Wiltshire.</p> <p>It is important to recognise the need for more employment land in the longer term possibly in rural parishes.</p>

4.4 Distribution and logistics development

There is significant demand for new logistic buildings. The need for large, regional distribution centres will be maintained in order to support the development of smaller, local units located on urban peripheries.

There continues to be a very high demand for industrial space along the M4 corridor and the opportunity to engage with this growth sector should be embraced.

The A303 corridor is attractive to this type of use but Salisbury itself is not owing to its poor road links.

4.5 Accessibility to infrastructure

Consideration must be given to the accessibility of employment sites to key infrastructure connections, for example the M4 Junctions and public transport provision.

Support is given to the form of employment focus within the JSF aligning with the LEPs work to ensure holistic and evidenced approach to economic growth. The JSF must give careful consideration to the opportunities to integrate employment land with existing and proposed residential development, having regard to the proximity to, and accessibility of, infrastructure connections.

4.6 A350 FEMA

There is a need to recognise the capacity and potential of sites in the Melksham area for commercial and retail purposes to create more local employment.

Strong potential of Chippenham to contribute significantly to economic growth and to enhance its self-containment through coordinated housing and economic growth. How can the Council intervene in Chippenham to ensure an employment led rather than housing led strategy for the town?

This ratio of jobs to houses appears to be disproportionate and may not be sustainable. The methodology for this correlation should be explained.

4.7 A303/Salisbury FEMA

The military sector should be separately identified for a clearer picture and considered more accurately as it is a substantial employment sector.

As the nature of employment has changed, the concept of allocating office and industrial sites seems old fashioned. A broader approach to employment is needed.

If Salisbury is to be a major economic centre then it is vital that it continues to provide lots of parking so that people from the extended catchment area can access the range of economic benefits. There is also concern that there could be insufficient housing to meet the needs of workers in the Salisbury.

Mere needs more employment land.

4.8 Duty to Cooperate: economic relationships beyond Wiltshire's boundaries

There should be an acknowledgement of the inter-relationship between other economic growth areas, such as South Hampshire.

The FEMA should recognise that in functional terms Frome sits alongside Warminster and Trowbridge. This should be acknowledged. Also extent of the HMAs and FEMAs and their

relationship with South Somerset should be clarified. The South Somerset FEMA accords with the district boundary.

4.9 Role of tourism

Tourism does not seem to have been considered in the FEMA even though it is a significant part of Wiltshire's economy and important in creating local jobs.

4.10 Role of settlements as focus for jobs

Care should be taken regarding addressing the suggested levels of job growth proposed in the FEMA. Whilst three functional areas are identified, the main settlements are generally expected to prove the most sustainable growth locations within these wider areas.

If the Joint Spatial Framework is to support economic growth across Swindon and Wiltshire then its strategies for housing and jobs should be consistent and integrated.

4.11 Level of detail in preparing the FEMA

More explanation required for:

- the approach taken to arriving at adjusted employment forecasts and the impact of the adjustments at district level
- the adjustments made to the baseline forecasts and the impact (in terms of jobs added or taken away) at both FEMA and district level
- how the council proposes to plan for housing and jobs in two different ways over two different geographies

4.12 Economic vision

Strategic employment sites can invariably require significant investment in infrastructure so a strategic approach to long term planning for Swindon in a timescale beyond 2036 is needed.

Swindon and Wiltshire Councils need to consider what sort of businesses with high growth potential the region can attract and the type of employment land and sub-market locations that will be suitable for them. In order to achieve this, both Councils must consult thoroughly with market specialists and the business community to understand the requirements of occupiers and developers, and use market intelligence to provide a better understanding of demand and supply issues.

4.13 Consultation process

Technical evidence could not be found on the website and was not presented to Cabinet. Complexity of the information makes it difficult to comment.

4.14 Role of retail

The JSF should recognise the importance of the retail market in the economy, and that this should be factored into the FEMA.

Detailed research into the retail sector is required to understand trends in the retail market, specifically the contribution of discount food retailers and their requirements, to understand the patterns of trade and future retail opportunity areas.

4.15 Employment allocations

Planning policies should avoid the long-term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. Land allocations should be regularly reviewed. Where there is no reasonable prospect of a site being used for the allocated employment use, applications for alternative uses of land or buildings should be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable local communities.

Question 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 (HMA) and each Functional Economic Market Area (FEMA) is robust? If not, in your response please explain why.

5.1 Review of the role and function of settlements

There was general support in principle for a review of the role and function of settlements. It was considered fundamental and essential work on which to base later judgements.

Some opinions considered it flawed or limited by not taking account of:

- need and demand;
- relationships between settlements and their hinterland;
- their profile and character; and
- opportunities for brownfield redevelopment.

Judgements about scales of growth should be 'policy off' and not be influenced by the current classification of settlements or administrative boundaries.

5.2 Rural settlements

There was concern that rural areas and rural settlements were not referred to in the methodology.

More development should be focussed at rural settlements than the current plan.

Should one or more rural settlement be selected to accommodate more than local needs, then this should be carefully considered and involve consultation with the community affected.

5.3 Role of the Joint Spatial Framework and Local Plan Reviews

Confusion regarding:

- which workstream leads to which document. They should be explained more clearly using a project plan.
- what information will be used for each document and consequently how it may be tested

5.4 The 'evidence base' – assessing need and demand appropriately

Concern that the SHMA was based on out of date data and should be reassessed. Together with the FEMA they may be under-estimating the potential for growth.

Concern that a comprehensive analysis could not be achieved in the timescales envisaged.

5.5 Assessment is too 'environmentally orientated'

Step 5c is very environmentally orientated because only the Environment Agency, Natural England and Historic England are being consulted.

5.6 Miscellaneous

There were several different questions about the methodology, for instance, whether it had changed since the previous plans had been prepared. Others felt unable to comment without more details, considered the process logical and appropriate or, in one case, too complex. Other responses to this question promoted particular outcomes for the local plan reviews rather than offering views on how to carry them out.

Question 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(s), 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.

Question 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.

Question 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.

Question 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.

Chippenham HMA: Calne

6-9.1 Recent levels of growth have not been matched with employment provision

Over the past 10 years Calne has seen a 25% increase in its population. During this time the level of employment development and job opportunities have not kept pace leading to a number of concerns, namely; excessive car travel/ownership and associated increases in congestion and air quality.

Future growth should only occur/be matched by a growth in employment opportunities.

It was pointed out that the proportion of journeys to work by sustainable modes (bus, walk and cycle) at 18.3% is low for a town of over 20k population.

6-9.2 Town centre regeneration

Any future development should help develop the vitality of the Town Centre and invest in its regeneration.

6-9.3 Main constraint/issue is traffic congestion and associated concerns – possibility of eastern relief road

A specific constraint on future development was identified as the congestion of the town centre and Curzon Street/Wood Street.

Development should create the opportunity of an eastern relief road to relieve congestion.

6-9.4 Dispersed strategy for housing across the HMA

It was noted that the market towns in the Chippenham HMA (namely Calne) had successfully taken a large amount of development in recent years.

Calne has successfully managed to deliver housing while Chippenham hasn't.

Future development strategy should take note of physical and technical barriers to development (landscape, flood issues etc.) but should be open to reviewing non-technical policy constraints. This includes policies that limit levels of development to ensure housing delivery is maintained into the future and should take account of how successful certain market towns have been at delivering housing.

Chippenham HMA: Chippenham

6-9.5 Transport

Transport infrastructure provision should be a focus for Chippenham moving forward. The following topics arose:

Eastern Link Road: A key piece of infrastructure needed to benefit not only Chippenham but the county as a whole. Objections related to the negative impact on out commuting, landscape impacts and viability concerns.

Southern Link Road: Should be explored as an alternative to an Eastern Link Road providing quicker access to businesses to the south west of Chippenham and helping to alleviate traffic in Lacock (objections were also voiced).

Sustainable transport: Chippenham offers one of the best opportunities in Wiltshire to build on existing sustainable transport infrastructure and should improve this provision moving forward, including investment in the railway station.

Transport recognised as a general constraint: Needs to be addressed if Chippenham is to take any more growth in the future, including investment around Chippenham, namely the A350 & J17.

6-9.6 Recent shortfall in the delivery of housing

Concern regarding the shortfall in housing delivery within the current plan period.

Should Chippenham continue as a centre for development when historic delivery has been lower than required? The reason behind lower delivery needs be identified and addressed before any further development is planned in Chippenham.

Development options should be more widely spread to ensure delivery moving forward.

6-9.7 Constraints to future development

Effect of further development on village of Lacock: Future development should take into account the effects on the historic village, the conservation area, listed buildings etc. There were concerns about the effects that further development to this side of Chippenham may have.

River Avon corridor/River Marden valley: These natural resources should be protected along with the opportunity these assets offer in terms of enabling the enhancement for recreation and leisure pursuits.

North Wiltshire Rivers Cycle Route: Should be recognised as a point beyond which development should not take place.

Leisure and Recreation: There is a need to invest in the provision of these amenities.

Brownfield land: Need to utilise land such as the police station and Bridge Centre

Chippenham HMA: Corsham

6-9.8 Public transport links with Bath and North East Somerset (BANES)

The vision for future development should make provisions for improved public transport links including those with BANES. This was noted on the following levels:

Bus services: along A4 corridor. Corsham should be treated as being in a closely related functional area with Bath.

Rail links: Need for a rail link (explained more below).

Congestion: Congestion west of the town at Box and within BANES requires solutions if already reported problems are not to be exacerbated.

It was noted how important people felt a Duty to Cooperate with BANES will be in relation to these issues, with particular importance placed on transport planning.

6-9.9 Train station

Train Station was named as an opportunity and something development should be geared towards supporting.

6-9.10 Corsham Link – pedestrian/cycle route

Consider proposals in the Corsham Area Framework and Draft Corsham Neighbourhood Plan including the potential for the Corsham Link pedestrian/cycle route along with the need for a second supermarket.

6-9.11 Development and investment in town centre

Corsham lies on the primary route network, a strategic bus route and has the potential for a railway station. It is the closest settlement of any notable size to Chippenham representing the most logical alternative settlement to account for the reported under delivery at Chippenham.

Alongside development investment should be coordinated to increase the attractiveness of the town centre and offer further employment opportunities.

Chippenham HMA: Devizes

6-9.12 Employment-led growth

<p>Future development should encourage employment investment in the local area. The reported lack of recent employment growth may be a symptom of smaller residential allocations coming forward in the town.</p> <p>The future strategy for Devizes should be to prioritise employment growth through the allocation of larger urban extensions in suitable locations around the town to stimulate greater economic led development.</p>
<p>6-9.13 Affordable housing need</p> <p>There is a general appetite/need for affordable housing within Devizes.</p>
<p>6-9.14 Traffic congestion</p> <p>One of the main reported obstacles to future growth was the problem of traffic congestion and the requirement for future development to invest in infrastructure alleviating this.</p> <p>Large strategic sites, whilst having the potential to increase vehicle usage, provide the opportunity for highway improvements (secured through section 106 obligations etc.) which may improve traffic flows - in turn reducing air quality concerns.</p>
<p>6-9.15 Air quality</p> <p>Air quality identified as a problem that needs to be taken into account when planning for future growth within Devizes – in combination with traffic congestion.</p>
<p>6-9.16 Sites/development strategy</p> <p>Development should consider Devizes as a suitable location for strategic housing and employment development over the plan period, with consideration given to strategic allocations to provide some of the necessary infrastructure.</p>
<p>6-9.17 Constraints</p> <p>The main constraints listed within representations also included:</p> <ul style="list-style-type: none"> • North Wessex Downs AONB to the north and east of Devizes • Setting of the Devizes Castle Scheduled Ancient Monument • Views and proximity to the Devizes Conservation Area
<p>Chippenham HMA: Malmesbury</p>
<p>6-9.18 Employment development and self-containment</p> <p>A significant decrease in self-containment was reported – new housing allocations should be delivered alongside employment to help improve self-containment.</p>
<p>6-9.19 Suitability for development</p> <p>Malmesbury is a large market town with many local services and facilities, a secondary school along with established social & community infrastructure. Taking into account these factors and its close proximity to the M4 corridor and the employment centres of Chippenham and Swindon it was implied that Malmesbury is well placed to receive more development within the plan period.</p>
<p>6-9.20 Constraints</p>

The following constraints to further development were highlighted:

- Impact on the character of the town, potentially overwhelming its services and infrastructure.
- Impacts on heritage and tourism – within the Core Strategy it describes Malmesbury as having a "high quality built and natural environment" which must be protected
- The south and east of Malmesbury is constrained by floodplain and AONB to the east

Taking the above into consideration it was suggested that a new town in this area could take the required development and place employment closer to the M4.

6-9.21 Transport

It was reported that the settlement is struggling to provide viable sustainable transport options with some currently relying upon financial contributions. The public transport options cannot credibly compete with car use and the distances to higher-order settlements are relatively long, further adding to the challenge of significantly improving services.

Consideration should be given to how the development strategy could align with a wider public transport plan that seeks to improve and commercialise the two main routes towards Chippenham and Swindon.

6-9.22 Malmesbury allocated within the Chippenham HMA

Reported to be unclear why Malmesbury town should be in Chippenham HMA

Chippenham HMA: Melksham

6-9.23 Potential for future development

The town's characteristics (large employment centre, proximity to larger settlements, strategic road links, railway station, historic high delivery rate) lend itself to a higher level of growth. Some suggested an elevation in the settlement hierarchy of Melksham is warranted.

Consideration should also be given to the possibility of locating development on a large scale closer to the M4 in the shape of a new settlement.

6-9.24 Employment

The future strategy for Melksham should focus on employment provision - providing land to encourage further large employers to the area. Providing a wider employment base for a variety of skill levels may assist at discouraging the high level of out commuting.

6-9.25 Town centre

A need exists to regenerate the town centre, encourage a wider variety of employment opportunities into the town and possibly pedestrianise parts of the town centre. Investment must continue in the town centre and brownfield opportunities must be maximised moving forward.

6-9.26 Wilts & Berks canal

Support for the restorations and preservation of this canal.

6-9.27 Transport

Development can help contribute to enhancements in the transport network including improvements to the railway station, bus network and eastern bypass. Specific points included:

- Need for investment and delivery of an eastern bypass (assisting bus travel, alleviate traffic from centre, support sustainable development in this region.)
- Note on the importance of enhancing the strategic north-south bus corridor through Melksham and towards/through Semington
- Need for continued investment in the railway station.

6-9.28 Lacock

Importance of the conservation of Lacock was raised in reference to protecting the listed buildings and conservation area from development.

Chippenham HMA: Other

6-9.29 Role of smaller settlements

The Joint Spatial Framework focuses on the role and function of main settlements with little regard to the role smaller settlements lower in the hierarchy will play with regards to housing delivery and future development.

Smaller settlements should be taken into account when planning for housing delivery in the future, including accounting for the need for affordable housing in rural settlements.

6-9.30 Infrastructure in smaller settlements

The Chippenham HMA concentrates solely upon the main settlements – reported that it appears little regard is given to rural and ancillary settlements. Moving forward suggestions pointed towards taking account of the infrastructure requirements of smaller settlements including maintaining the viability of rural services.

6-9.31 New settlement

Opportunities exist to develop a new settlement in the Chippenham HMA to solve some of the housing problems.

Salisbury HMA: Amesbury

6-9.32 What more can be done to improve the range of services to improve the attractiveness of the area?

Suggestions to enhance the range of services in Amesbury included improvements to:

- The retail offering
- The leisure offering
- Transport links
- Tourist accommodation

6-9.33 Should planning for Amesbury be distinct to planning for Bulford and Durrington?

Whilst Durrington and Amesbury share interests in issues such as heritage and would benefit from joint planning, other issues such as green space have separate constituencies and Bulford and Durrington are both lesser order settlements in the settlement hierarchy.

6-9.34 How should the area capitalise on business investment?

Business support for infrastructure development and approaches to match education with employment opportunities should be sought.

6-9.35 What amount of further housing is appropriate?

There is a lack of available space for sites for further housing. Instead of further housing, there should be an emphasis instead on aiming to ensure suitable infrastructure exists.

However, it was suggested that the land at King's Gate could accommodate up to 70 additional dwellings, making more effective use of the allocated land.

Salisbury HMA: Salisbury**6-9.36 Churchfields allocation**

The likelihood of the Churchfield sites' delivery should be critically reassessed and evaluated against the tests set out in the NPPF, and potentially kept as industrial land with housing indicated for the site moved elsewhere.

6-9.37 Housing numbers

Increased housing numbers should be allocated for the Salisbury HMA, particularly at Salisbury, to improve affordability and enable workers to live and work in the City to improve self-containment and prevent a shortfall of labour and stagnation of Salisbury's economy.

6-9.38 Housing locations

New development should not be allocated in Salisbury due to infrastructure and air quality issues.

Instead of urban extensions, dispersed development of housing to towns and villages which were close to employment locations and public transport should be implemented.

The opportunity for developing a new settlement should be investigated, such as a new village south east of Porton. Re-opening the Porton station would provide good access to public transport.

6-9.39 Active transport

Improvements to roads in the City centre should be sought which would benefit cyclists and pedestrians by improving safety and connectivity to neighbouring communities. Opportunities exist for strategic walking and cycling routes.

6-9.40 Improving road/rail infrastructure

Suggested improvements to transport infrastructure included:

- Reopening Wilton and Porton stations
- Integrating Salisbury station with a bus and coach park
- Upgrading the A36
- Building an Eastern Bypass
- Reducing the amount of in-commuting to the City

By adopting more sustainable transport facilities, brownfield land could be made available for development from city centre parking.

Salisbury HMA: Tidworth and Ludgershall

6-9.41 General points

- Army rebasing in the area may help to improve economic diversification and job growth
- The inability of Drummond Park to provide homes has contributed to low housing delivery
- Tidworth and Ludgershall form part of the functional Andover HMA

Salisbury HMA: Other

6-9.42 Salisbury HMA housing numbers should be increased

An increase in housing numbers is needed to maintain economic growth and lower housing prices.

6-9.43 Dispersed strategy for housing

Support for a dispersed strategy where houses are allocated in smaller sites to ensure that houses can be delivered within the plan period.

However, a dispersed strategy would result in increased commuting.

6-9.44 Need for economic growth

Without a growing employment focus, Salisbury will be marginalised by other competing centres. Factors other than housing which will restrict economic growth include:

- A lack of university level higher education establishments
- High housing costs in relation to wage levels
- Poor road transport infrastructure.

6-9.45 Churchfields should not be considered as an allocation

Due to delays and complications, the Churchfields allocation should not continue to be considered as an allocation. An objective review of the feasibility of the Churchfields proposal should be conducted.

6-9.46 Content and clarity of HMA profile

Amendments to the HMA profile document include:

- Stating that the Salisbury HMA borders the New Forest National Park and New Forest District Council administrative areas, as well as Dorset and Test Valley
- Removing the Wiltshire Housing Site Allocations Plan allocations from the constraints map as they have not been examined
- Including contours on the constraints maps
- Acknowledging recreational impacts and potential mitigation approaches on the New Forest European Sites (SPA/SAC)

6-9.47 Transport infrastructure improvements

Road congestion and poor infrastructure is a main constraint to Salisbury's growth.

Before further development is approved, the following should be considered:

- A public transport strategy should be implemented
- A by-pass should be built
- A comprehensive review of traffic concerns should be undertaken and findings implemented

Swindon HMA: Cricklade

6-9.48 Cross boundary consideration

The framework for the Swindon HMA is too narrow and should be extended to include cross county borders, some of which are closer than the Town of Swindon to Cricklade.

The framework should consider where development close to the border impacts upon Cricklade.

6-9.49 Infrastructure

Transport:

- The road infrastructure is inadequate with congestion being caused by commuting into Swindon. New road infrastructure needs to be considered to alleviate this 'rat running'. This poses a significant constraint to further development.
- Highway improvements to the A419 are necessary including the possibility for an additional junction to take traffic to Northern Swindon and other areas.

Education:

- More than 50% of children aged 11 and over in the area attend schools outside the County in Gloucestershire. With this in mind further development should be coupled with educational provision to provide sufficient places.

6-9.50 Identity

It is important to maintain the towns identity and the physical break between Swindon and Cricklade.

Swindon HMA: Marlborough

6-9.51 Swindon HMA

Support that Swindon HMA now incorporates the rural hinterland and surrounding areas to more accurately reflect its function as a settlement.

What amount of development could and should Marlborough take? While Marlborough, as a service centre in its own right, should accommodate the growth it needs, Swindon should be the focus for growth due to it being the main focal point for employment, particularly in respect of larger companies.

6-9.52 Infrastructure

The following themes emerged from representations on infrastructure:

- Traffic congestion and air quality are local concerns.
- Travel/car problems with reference to parking and HGV's within the town.
- It was suggested that to enable future growth to take place of an appreciable size, investment in infrastructure will be required.
- Infrastructure focus was too much on Swindon – Marlborough must also visibly be taken into consideration.

6-9.53 Constraints

Insufficient consideration had been visible on heritage and architectural grounds - this along with conservation is important for Marlborough.

Given the constraints, an alternative to additional development at Marlborough should be pursued whereby the large villages in the hinterland surrounding this main settlement should absorb some of the growth.

6-9.54 Other issues

- Tourism industry should be acknowledged and taken into consideration.
- More consideration of sports and recreation facilities should be visible within the documentation and moving forward.
- Neighbourhood Plan is currently 'calling for sites' which may give way to development opportunities.

Swindon HMA: Royal Wootton Bassett

6-9.55 Dormitory relationship with Swindon

Support and Concern was received regarding RWB having a close relationship with Swindon. This was on the basis that given links with Swindon, RWB is well suited to accommodating additional development.

If RWB does take growth there should be a focus on making any relationship with Swindon as sustainable as possible.

6-9.56 Gap between Royal Wootton Bassett and Swindon

Gap between RWB & Swindon needs to be taken into consideration - development towards J16 should be minimised to respect this sense of separation.

RWB has a cultural identity which is profoundly separate to Swindon and coalescence could lead to a breakdown in the special community spirit in RWB.
6-9.57 Education provision Need to take into account the requirements to meet future demands – it must be clear whether the need is to expand the current school or whether an urban extension is required to accommodate a new school.
6-9.58 Railway station Needs careful consideration and should not necessarily direct development. A new station may be a highly complex and costly project – network rail only awarded funding to 5 new station projects in 2017. A railway station would have significant sustainability benefits for the whole HMA.
6-9.59 Bypass Need for a bypass/distributor road, for both traffic congestion and HGV traffic.
6-9.60 Large mixed use allocations This scale of development may enable infrastructure improvements, new facilities and employment areas.
6-9.61 Lyneham Clear relationship between the town and Lyneham 4 miles away with opportunities for more linkages to be made between these two settlements. Lyneham has substantial MoD airfield and training facilities and should not be ignored as a location for growth.
6-9.62 Other constraints The impact of growth on the landscape associated with the topography around this area The lack of infrastructure to cope with future development, namely roads and education.
Swindon HMA: Swindon
6-9.63 Deliverability – past and future Deliverability is a major concern in relation to future growth at Swindon (the reliance on major infrastructure in strategic sites). Current sites have not delivered and this needs to be protected against when looking at future growth strategies.
6-9.64 Future growth Swindon is an important regional centre that should accommodate significant levels of housing and employment growth – mainly due to its sustainable location and strategic links on transport corridors. Due to deliverability issues, growth should be more evenly distributed in the housing market area so that the areas that have seen limited growth previously can be revisited.

6-9.65 Transport

Key points included:

- The need to plan for a western Swindon bypass route
- Poor accessibility to the town centre which needs to be improved – including railway station.
- Development should incorporate and strengthen sustainable transport links.

Swindon HMA: Other

6-9.66 Swindon HMA

With Swindon struggling to build strategic allocations the extension of the HMA should enable development to be accommodated in the surrounding area.

6-9.67 Development strategy moving forward – role of smaller settlements

There needs to be a balanced portfolio of large, medium and small sites with the smaller settlements located in close proximity to Swindon playing a key role in delivering relatively small scale developments earlier in the Plan period whilst the larger, more complex urban extensions come forward.

The current profile does not currently provide any meaningful consideration of the numerous smaller settlements which are included within the HMA.

A review of the settlement hierarchy should be considered.

6-9.68 Infrastructure in smaller settlements

Transport impacts of past and future growth on the settlements around Swindon needs to be taken into account.

Congestion needs to be dealt with on the roads that lead to Swindon from these more rural settlements with high traffic volumes.

Consideration should be given to the opening of a railway station to provide a sustainable means of travel to alleviate travel problems.

6-9.69 Cross-boundary working

Administrative boundary between the two authorities, Wiltshire Council & Swindon Borough Council:

- Historically the difference of political views between the two authorities has proven to be a major obstacle in comprehensively planning development that is located astride the administrative boundary.

Trowbridge HMA: Bradford on Avon

6-9.70 Green Belt should be reviewed

The Green Belt currently constrains employment and housing opportunities due to the limited ability to expand. This will prevent the town from meeting future development requirements.

6-9.71 Green Belt should not be reviewed

The Green Belt should be protected to maintain community identity and provide green space.
<p>6-9.72 Further development</p> <p>There is a need for both employment and housing land allocations.</p> <p>New development needs to be community led.</p> <p>Mixed-use allocations may complement existing communities and ensure that growth can be delivered without detriment to economic growth delivery.</p>
<p>6-9.73 Poor transport infrastructure</p> <p>Further development will potentially strain infrastructure.</p> <p>Peripheral expansion would help to move traffic demands away from the Town Centre.</p> <p>Improvements to public transport should be added to the vision for Bradford on Avon.</p>
<p>6-9.74 Settlement boundary</p> <p>Due to constraints in the east and west of Bradford on Avon, the most appropriate area for development would be to the north of the town, extending the existing settlement boundary towards the B3105.</p> <p>However, there were also objections to any expansion of the settlement boundary.</p>
Trowbridge HMA: Mere
<p>6-9.75 Assessment of Mere in the consultation</p> <p>The HMA profiles did not contain a specific section for Mere, suggesting a lack of regard for Mere as a settlement capable of and requiring growth.</p>
<p>6-9.76 Mere should be an area for potential growth</p> <p>Expansion of smaller scale settlements such as Mere presents a suitable alternative to Trowbridge to accommodate housing need.</p>
<p>6-9.77 Mere should not be moved from the Salisbury HMA to the Trowbridge HMA</p> <p>Mere should not be allocated in the Trowbridge HMA due to Mere's historic, education, health service, leisure and transport links with the Salisbury HMA.</p>
Trowbridge HMA: Trowbridge
<p>6-9.78 Green Belt should not be reviewed</p> <p>The Green Belt should not be reviewed as it helps to make the town more attractive. Instead, brownfield sites should be prioritised for development.</p>
<p>6-9.79 Green Belt should be reviewed</p> <p>The Green Belt should be reviewed, particularly if it releases additional employment land for Trowbridge. This would help to open up sites which are served by existing transport infrastructure, to achieve a better distribution of housing and to prevent housing being deflected onto villages.</p>

6-9.80 Ashton Park development

The Ashton Park development will help to provide employment land. Maximum effort should be made to overcoming the obstacles in the development before allocating more greenfield land as a replacement.

The Trowbridge HMA paper should have reflected on the reasons for the Ashton Park delay and the impact of the proposed Trowbridge Recreation Management Mitigation Strategy on other development sites at the edge of Trowbridge.

Due to the delays, development of a mix of size, types and locations at the edges of Large Villages should be implemented instead of urban extensions such as at Ashton Park.

6-9.81 Transport infrastructure

Improving transport infrastructure, including increasing the rail service and improving highways will help to facilitate access to employment, attract inward investment and improve air quality. Improvements to bus services should be a priority.

An imbalance of secondary schools in Trowbridge contributes to congestion in the settlement. The early delivery of secondary education east of River Biss at Ashton Park and relocating one of the existing schools to the east would help to provide more balanced flow demands.

6-9.82 Brownfield land

Brownfield land opportunities with close proximity to employment should be prioritised to help make the town more attractive and prevent development on greenfield land.

6-9.83 Clarity and content on HMA profile

The constraints map should reflect constraints associated with bats and show why sites have been environmentally discounted.

6-9.84 Balance of housing and jobs

There should be a halt to further housing allocations due there being a surplus of workers and high deprivation levels. Instead, the regeneration of the Town Centre should be prioritised. There is also a need for retirement homes and care homes.

Concerns that previous house building was deflected from Chippenham to towns in north and west Wiltshire, contrary to Core Policy 1, and that this would continue in the period 2016-2036.

Trowbridge HMA: Warminster

6-9.85 Constraints

There are not more significant environmental constraints in Warminster compared to Trowbridge, as suggested in the paper.

6-9.86 Transport infrastructure

Concerns about the effects of more housing on infrastructure, particularly the B390.

Support for an upgrade of the A303.

6-9.87 West Warminster Urban Extension

The West Warminster Urban Extension should not be considered as the sole focus of growth given the delays to the application to date.

6-9.88 Housing numbers

Support for the expansion of Warminster due to good road and rail links and a range of facilities which higher levels of growth would improve.

6-9.89 Location of housing

Housing should be allocated close to where the main economic potential is located.

Trowbridge HMA: Westbury

6-9.90 Westbury should become a greater focus for growth

More growth should be allocated at Westbury due to a lack of environmental constraints, having a major train station, being positioned on the A350 corridor and having a considerable market capacity.

Development could also support the delivery of improvements to the A350.

6-9.91 Transport infrastructure

Opportunities to improve transport infrastructure include upgrading Dilton Marsh train station, providing a bypass for Westbury and upgrading the A350.

Congestion in and around Hawkeridge and West Wiltshire Trading Estate should be given a higher priority as a major constraint on growth.

Trowbridge HMA: Other

6-9.92 The SHMA suggests a modest increase in housing needs, but a surplus of workers compared to jobs in the area. Should housing needs be met in the HMA?

The housing need should be met as far as possible within the HMA.

The surplus of workers should not prevent further development, but simply encourage further employment related development.

6-9.93 What are the relationships between settlements and with settlements outside?

The relationships between the settlements within the HMA are strong. Further assessment into this would be useful.

The settlements within the HMA have strong relationships with other settlements up the A350 to Chippenham and the M4, and beyond to Bath and the West of England. Consequently, infrastructure development will be an important issue in these areas.

6-9.94 HMA Profile

An assessment of the smaller settlements in the HMA should be undertaken to deduce the function and capacity of the HMA, rather than just assessing the larger settlements.

The older population, as identified in Bradford on Avon, was not specified as a constraint within other Wiltshire settlements.

Question 10: Do you have any comments on the advantages or disadvantages of any of the following 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.

- **Urban capacity (maximising the potential for growth within Chippenham, Salisbury, Swindon, Trowbridge and market towns in Wiltshire)**
- **Urban extension (focussing growth on extensions to Chippenham, Salisbury, Swindon, Trowbridge and market towns in Wiltshire)**
- **Transport-based development (locating development where it will have the best access by a range of transport modes)**
- **More development at the larger, better served rural settlements**
- **New settlement(s) (the development of one or more new settlements within the area)**

10.1 Urban capacity

General support for maximising brownfield capacity within the main settlements. Some queries over the assessments of urban capacity.

10.2 Urban extensions

House builders showed the most support for urban extensions. Emphasis on the need for a range of approaches recognising the need to provide a variety of sites to ensure continuity of land supply.

Concerns and objections were raised regarding the increased reliance on the private car and greater congestion and air quality.

10.3 Transport based development

Need for significant investment and appropriate locations in terms of links to other settlements and jobs.

10.4 More development at the larger, better served rural settlements

May help to support rural communities and local services.

10.5 New settlement

May help to relieve development pressures elsewhere. May undermine the vitality of existing settlements. The main concern was the substantial cost and length of time it might take to deliver houses and additional infrastructure.

10.6 Miscellaneous

Other comments included:

- Preferred approach would focus growth in Chippenham, Salisbury, Swindon and Trowbridge due to infrastructure making them more sustainable locations
- Over-reliance on one strategy likely to reduce choice in the market
- Blend of all concepts needed

- Housing requirements should be considered and included where possible in neighbourhood plans

Question 11: Do you have any further comments to make on the proposed Joint Spatial Framework or matters raised in this Paper?

11.1 Plan preparation/status of the JSF

- Concerns that the JSF is non-statutory
- Lack of clarity over timetable and alignment of the JSF and local plan reviews
- Proposals not underpinned by an evidence base
- Need for a longer time horizon, up to 2050
- Collaboration with other neighbouring authorities needed too

11.2 Housing (including affordable housing, rural settlements, settlement boundaries)

Housing requirement comments:

- Consider new methodology to calculate the OAN and update the JSF
- Housing requirement for Wiltshire and each HMA to be set at a minimum to significantly boost supply
- Need to clearly explain the disparity in housing allocations between HMAs
- More attention needed on south Wiltshire to address growing military population
- Consider location and timescale for delivery of sites already committed within housing trajectories
- Not confuse demand (government/ developers) with need (evidence)
- Oppose two-tier housing requirement for community areas; one for main centre and another for remainder

Housing location comments:

- No more greenfield development until all brownfield sites developed
- No new towns in the Trowbridge HMA
- Westbury highly sustainable location for growth. Excellent transport links. Less constraints than rest of Trowbridge HMA
- Consider new town in Wiltshire, e.g. redeveloping a former MOD site would remove need to overrun existing settlements
- More dispersed pattern of smaller scale development served by existing public transport links (may stop loss of local services and rural/ urban divide)
- Strategic issues and strategies for individual settlements may be mutually incompatible re sustainability, local character and environmental constraints

Rural housing:

- Lack of infrastructure in villages
- Consider development on edge of small villages to revitalise these settlements

Affordable housing:

- More pressure needed on developers to provide affordable housing
- Lack of reference to affordable housing in rural area
- Need for retirement/care homes for elderly/disabled and affordable homes for local people

Settlement boundaries:

- Settlement boundaries need to be updated as part of the LPR process
- Include full assessment of the role and function of rural settlements and settlement strategy

11.3 Employment and economy

- Employment provision lagging behind housing
- Recognise and support value of tourism sector
- Greater focus on digital, knowledge and life-long learning economy
- Focus on fulfilling SWLEP aspirations in Objective 2
- Embrace development opportunities recognised by SWLEP, especially at J17
- Consider contribution of sport to the economy, as well as health and well-being benefits

11.4 Infrastructure

- Many market towns cannot expand without extra infrastructure
- New infrastructure should be delivered in advance or at same time as development
- Consider impact of development upon existing infrastructure too
- Infrastructure should include health and education facilities
- More emphasis upon public transport solutions, e.g. bus services
- Need for significant enhancement of cycling infrastructure
- Consider how green infrastructure requirements will be identified and delivered and supported by policies
- Consider air quality impact when planning new transport infrastructure

11.5 Consultation process

- Unable to locate Chippenham Masterplan (referenced in the JSF) on the website

- Consultation too short, close to Christmas, and documents too difficult to find
- Helpful if officers engaged with towns and parishes affected by JSF/ LPR through local meetings
- Documents very technical and difficult to understand. Lack of background information. Need plain English guide in future
- Clarify next stages of the consultation process
- Fuzzy boundaries on maps showing HMAs. Need to clearly show which parishes are in each HMA (on map and/ or separate list)
- Poor editorial quality of the JSF

11.6 Relationship with neighbourhood plans

- JSF is reviewing the policy context of the Core Strategy so neighbourhood plans, which must conform with the Core Strategy, would have to be revised accordingly
- Neighbourhood plans should not influence/pre-determine the outcome of the JSF
- JSF should reference resources, e.g. Historic Environment, to help communities develop their own plans
- Limited resources for rural communities to develop their own plans so need right professional support

11.7 Sustainability Appraisal

- Corsham Batscape Strategy submitted as additional baseline data for the SA draft scoping report
- Careful consideration to be given to how 'reasonable alternative strategies' are determined and to form part of early consultation with stakeholders
- Issue with JSF being non-statutory and the consideration of reasonable alternatives at this stage – useful for JSF to be made part of a statutory joint development plan

11.8 Duty to Cooperate

- No discussion of duty-to-cooperate with other neighbouring authorities, e.g. West of England LPAs (this must be done at the earliest stages of plan preparation)
- New Forest NPA recognises benefits of joint working and similar models have been used elsewhere
- Environment Agency would like opportunity to work with LPAs reviewing evidence base and, as non-statutory, would like to recover costs through charging framework

11.9 Development process

Need mechanism to ensure timely delivery of development.

11.10 Promoted sites

Various sites promoted for consideration.