

STRAT156

The Emerging Spatial Strategy Consultation Response Form

Ref:	(For official use only)
-------------	--------------------------------

The overarching 'Emerging Spatial Strategy' paper identifies the proposed overall level of new homes and employment land for each main settlement and rural part of the HMA, over the plan period, together with what remains to be planned for once existing housing completions and commitments have been accounted for.

To view the Emerging Spatial Strategies paper please visit the Council's Local Plan Review Consultation page on it's website at: <https://www.wiltshire.gov.uk/planning-policy-local-plan-review-consultation>

Please return to Wiltshire Council by Tuesday 9th March 2021.

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

This form has two sections:

Section One – Personal details

Section Two – Your comments on the Emerging Spatial Strategy. Please use a separate sheet for each representation.

Section One – Personal details

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

	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		
Address Line 4		

Postcode		
Telephone Number		
Email Address		

Section Two – Please enter any comments you have regarding the Emerging Spatial Strategy in the box below.

Comment:

The housing need figures for Wiltshire are too high. The Government target for Wiltshire, calculated using the national “Standard Method,” is for 40,835 additional dwellings between 2016 and 2036. Wiltshire Council's decision to increase this target to 45,630 appears nonsensical and contradicts the climate change emergency they have already declared.

This increase is almost 5,000 additional dwellings. Why are so many additional houses needed when there are already plenty of sites not which developers are not progressing; sites which would already provide approximately 1 million houses. Why has Wiltshire Council voluntarily increased its own baseline target by almost 5,000 additional houses? I have not read or seen any sound justification for this action. Other authorities have pushed back on the government target figures and Wiltshire Council should do the same and stop the arbitrary destruction of greenfield countryside. How can Wiltshire council even consider concreting over additional swathes of countryside, when not only is the countryside the town’s most valuable asset for attracting residents and visitors but also when this decision will accelerate climate change and worsen the climate emergency.

I object to the planned development as it is unnecessary and will destroy the character and beauty of the Avon and Marden Valley, the North Wiltshire Rivers Cycle path and the character of the distinct rural villages of Studley, Derry Hill and Bremhill.

Site 1 (East Chippenham) should exclude any development between the North Rivers Cycle Path and the River Marden. Part of Site 1 (East of Chippenham) lies within Bremhill Parish. Bremhill Parish have a Neighbourhood Plan which was adopted in Feb 2018 and protects land between the North Rivers cycle path and the River Marden from development.

The Emerging Spatial Strategy promotes green infrastructure and access to the countryside. The unspoilt countryside between the North Wiltshire Rivers cycle path and the River Marden is protected in the Bremhill Neighbourhood Plan and should not be developed. Over 5,000 people objected to the potential closure to the cycle path last year showing that it is much appreciated by the existing inhabitants of Chippenham for access to the countryside. The proposals would have development on both sides and a road crossing it, as well as destroying the countryside that people access around it.

The distributor road and the massive housing development will not only concrete over the open space between Chippenham and Calne but destroy local several working farms, just at a time when we need more locally grown food; Wiltshire Council should prioritise protecting the best and most versatile agricultural land, which helps sequester carbon and ensure local food production and future food security, including the Council’s own County farms which are currently at risk under in the proposed Local plan. Development in the Avon & Marden Valley would be immensely damaging in terms of environmental impact, traffic impacts and additional greenhouse gas emissions.

In February 2019 the Council resolved to acknowledge a climate emergency and to seek to make the county carbon neutral by 2030. A Global Warming and Climate Emergency Scrutiny Task Group was set up to gather evidence and come up with recommendations on achieving net zero. A commitment was also made to make the council carbon neutral by 2030- how is the development proposed in the Local Plan of 5,000 additional dwellings going to contribute to this commitment? It is completely contradictory to the goal of achieving net zero by 2030.

The distributor road has been marketed as a 'bypass' to ease congestion through Chippenham however it will not serve this purpose, it will be a distributor road to serve new housing estates and will worsen congestion and air pollution in Chippenham, Calne and its surrounding areas. Sections of the road include 20mph areas, turnings into residential areas, road crossings, school pick-ups, crossings of public rights of way, all of which will slow the movement of traffic, create more pollution from car emissions and will not ease any of the current congestion but will instead aggravate it.

Section 3.12. 'Climate Change' of 'The Future Chippenham Road Design PEAOR Non-Technical Summary' states that "Wiltshire Council declared a Climate Emergency in 2019, and thus reiterated their commitment to working towards zero carbon". However, this document clearly also states that 'The transport sector was the largest emitting sector of UK greenhouse gas emissions in 2017, emitting 27% of all emissions. Of all sectors, it has also shown the least reduction since the 1990 baseline, at only 2%.' So the distributor road plan and further housing developments completely contradicts Wiltshire Council's commitment to achieving zero carbon.

The building of a distributor road and therefore also the building of houses and associated infrastructure encroaches upon the Calne Local Plan which covers the distinct rural villages of Studley, Derry Hill and Bremhill. It is clear that the road is a Trojan horse in order to secure land for development; development which would fundamentally change the character of the Avon and Marden Valley, the distinct rural villages of Calne without and Calne.

Calne Local Plan, which includes the land directly adjacent to the distributor road development area, aims to 'Ensure that new development is integrated into the existing community of Calne and Calne Without, whilst preserving the identity and individuality of each settlement and preventing coalescence'. The distributor road plan is a direct threat to this as it will create coalescence between Chippenham and Studley and Derry Hill which are currently only 2km away from the proposed site.

Calne Local plan also states it will 'Enhance the green infrastructure network through the creation of new open spaces and the protection and improvement of existing open spaces' and that it will 'Protect the countryside from inappropriate development and ensure that the landscape character and local distinctiveness of our rural villages and settlements are protected'. The distributor road will destroy the distinctiveness of the rural villages of Studley, Derry Hill and Bremhill and merge them with suburban Chippenham. Open spaces will be destroyed and the green infrastructure of the North Wiltshire Rivers (403) Cyclepath will be entirely negated as it will be surrounded by houses and tarmacked over.

Calne already has an air quality action plan to reduce particulate matter from traffic in the air management area in the centre of town. This is having a positive impact, however, it is highly likely that the distributor road will increase road traffic into Calne and therefore have an overwhelmingly negative impact on air quality. The Future Chippenham Road Design PEAOR Non-Technical Summary states that the baseline air quality levels are very good and there is currently very low air pollutants due to the rural nature of the land and its surroundings. No air quality modelling has been undertaken to inform the potential air quality impact of each route. 7,500 domestic dwellings will

result in approximately 10,000-15,000 additional vehicles using the distributor road, which will no doubt have an overwhelmingly negative impact on air quality.

Much of the green space in the area is privately owned agricultural land however woodland and riverside areas can be accessed via public rights of way and permissive rights of way, linking Pewsham to green space in the south, including woodland towards Old Derry Hill. These green spaces currently benefit residents by providing exercise through open spaces with good air quality which benefits physical and mental health. If these public rights of way are through housing developments and next to a distributor road (which will increase air pollution) the public health benefits of the green space are lost.

Paragraph 168 of the Calne local plan states that existing views into and out of settlements should be protected; however the Future Chippenham Road Design PEAOR Non-Technical Summary states that '3.6.8. Pewsham and Rowden Hill settlement edge are visible in views generally from the south of Chippenham along approach roads and from footpaths within the River Avon corridor. There are views from approach roads such as the A4, which descends from Derry Hill eastwards and also from Patterdown, a southerly approach road connecting from the A350 to the south. 3.6.9. There are approach views or a progression of views along country lanes such as Stanley Lane, PRoW and recreational routes including the North Wiltshire Rivers Cycle Route (National Cycle Route (NCR) 403), Wilts and Berks Canal and Avon Valley Path that are distinct linear landscape features along the valleys of the River Avon and River Marden. 3.6.10. In the wider area, long distance elevated views are possible from Derry Hill, Snaith Hill and Bencroft Hill.' The distributor road and development around it will create coalescence with the ancient villages of Studley and Derry Hill and destroy the landscape around them and the views from them.

Paragraph 169 of the Calne local plan states 'The setting of Calne and Calne without makes a positive health and wellbeing contribution; as a resident of [REDACTED] to that. This year particularly has shown us how lucky we are to live in such a special place where the benefits of the countryside are on our doorsteps and I have used the North Wiltshire Rivers Cycle Route (National Cycle Route (NCR) 403) daily to walk, exercise and improve my physical and mental health during the Coronavirus Pandemic. Thousands of residents from both Calne and Chippenham do the same. The positive health benefits of access to open green space with no air pollution are self-evident and will be destroyed by the construction of a distributor road and 7,500 houses.

In the Vision for Calne Local Plan paragraph 47 citizens and Calne Council have agreed 'to protect our unique settlement character and landscape setting.' Paragraph 48 refers to growing the well-being of the community through protection of green spaces'; green spaces which will be lost through the proposed Local Plan and the 'Future Chippenham' construction of a distributor road.

Paragraph 169 of the Calne Local Plan states that 'The River Marden valley provides an important pastoral landscape with open views along the river valley. The valley is important in landscape terms with a locally distinctive pattern of natural features and contains important historical features, notably the line of the Wilts and Berks Canal and the former Chippenham to Calne railway line.' The character of both of these will be irrevocably destroyed by the distributor road plans and further housing development that the road will service.

The Calne Local Plan Policy NE3 'Biodiversity' states that it will 'protect and enhance riparian corridors for protected species, such as otter, kingfisher and water vole, especially along the River Marden and the Wiltshire & Berkshire Canal to the west of Calne. The distributor road and housing development plans threaten both the protected Greater Crested Newt habitats and the protected route of the Wilts & Berks canal.

Wiltshire Council created a misleading situation by attempting to consult upon a distributor road route (Future Chippenham Consultation) prior to the results of the Local Plan consultation; by giving route options on the road consultation they pre-determined that the road will be in-filled with houses and the location of these houses. This undermines the Chippenham Local Plan Review Consultation.

I would like Wiltshire Council to introduce a policy framework that comprehensively addresses the urgent need for material, year on year reductions in carbon emissions, in line with the Council's democratic and legislative obligations, and the advice given by Client Earth;

Wiltshire Council should follow the recommendations on planning made by the Climate Emergency Task Group;

Wiltshire Council should completely rewrite the current Local Plan proposals in line with the above points and also to include specific measures to reduce emissions, including:

- **Planning for new housing developments where there is genuine need**, rather than being driven by out-dated, top-down targets;
- **Avoiding building houses where this creates car dependency** and people will need to commute long distances to their places of employment;
- **Introducing planning policies that require housing and commercial development to be built to zero carbon standards** in settlement designs that are genuinely sustainable, avoiding building on greenfield sites wherever possible;
- **Reassessing major road schemes based on realistic projections of future traffic volumes** taking into account local and national climate change policies and longer- term changes in work patterns as a consequence of COVID-19;
- **Creating a planning framework that promotes renewable energy generation**, including making specific provision for onshore wind generation (the lowest cost form of electricity generation), which is not currently mentioned anywhere in the Plan;
- **Encouraging a significant shift away from private cars to public and active transport**, investing in cycling and walking infrastructure and improving infrastructure for electric vehicles;
- **Protecting and enhancing the carbon absorption properties of the natural environment** (that of our natural capital and carbon sinks), including significant increases in tree planting, also helping to improve biodiversity;
- **Introducing planning policies that require climate change impact assessment** of all proposed developments, in advance, against the Council's carbon reduction targets.

Future notification

I wish to be notified of any future updates relating to the Local Plan Review:

YES: NO:

Clicking yes will add you to the planning policy contact database. This will mean you are kept informed of any future planning policy updates and consultations.

Further information on how the Spatial Planning Department treats your personally identifiable information can be found by reading the privacy notice available via the link below:

<https://www.wiltshire.gov.uk/planning-privacy-notice>

Here you will also find information about how and why your data may be processed and your rights under the Data Subject Information Notice section further down the page.

Signature:

Date:

Thank you for completing this form.

Data Protection

Wiltshire Council has a duty to protect personal information and will process personal data in accordance with Data Protection legislation. The personal data you provide on this form will only be used for the purpose of the Wiltshire Development Framework. It may also be used for the prevention or detection of fraud or crime and in an anonymised form for statistical purposes. The data will be stored on computer and/or manual files. You have a right to a copy of your information held by any organisation, with some exemptions. To gain access to your personal data held by Wiltshire Council or if you have any Data Protection concerns please contact Wiltshire Council's Data Protection Officer on 01225 713000 (switchboard) or e-mail to dataprotection@wiltshire.gov.uk ."

STRAT174

The Emerging Spatial Strategy Consultation Response Form

Ref:	(For official use only)
-------------	--------------------------------

The overarching 'Emerging Spatial Strategy' paper identifies the proposed overall level of new homes and employment land for each main settlement and rural part of the HMA, over the plan period, together with what remains to be planned for once existing housing completions and commitments have been accounted for.

To view the Emerging Spatial Strategies paper please visit the Council's Local Plan Review Consultation page on it's website at: <https://www.wiltshire.gov.uk/planning-policy-local-plan-review-consultation>

Please return to Wiltshire Council, by 5pm on Monday 8th March 2021.

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

This form has two sections:

Section One – Personal details

Section Two – Your comments on the Emerging Spatial Strategy. Please use a separate sheet for each representation.

Section One – Personal details

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

	1. Personal details	2. Agent's details (if applicable)*
Title		[REDACTED]
First name		
Last name		
Job title (where relevant)		PLANNING MANAGER – LOCAL PLANS
Organisation (where relevant)		HOME BUILDERS FEDERATION (HBF)
Address Line 1		[REDACTED]
Address Line 2		
Address Line 3		

Address Line 4		
Postcode		
Telephone Number		
Email Address		

Section Two – Please enter any comments you have regarding the Emerging Spatial Strategy in the box below.

Comment:

The HBF submit the following comments on the Emerging Spatial Strategy for Wiltshire :-

PLAN PERIOD

The Council is proposing a plan period of 2016 – 2036. The HBF consider that this plan period is inappropriate. If the Wiltshire Local Plan Review (LPR) is adopted in the first quarter of 2023 as envisaged in the Council’s latest Local Development Scheme (July 2020), the start date of 2016 will be at least six years in the past, for many rural settlements this means very limited development until after the plan end date because of delivery between 2016 and the LPR adoption date (see Table 2.3 in Empowering Rural Communities consultation document). This is contrary to the 2019 NPPF’s promotion of sustainable housing development in rural areas, where it will enhance or maintain the vitality of rural communities (para 78). With regards to the proposed plan period end date of 2036, the 2019 NPPF sets out that strategic policies should look ahead over a minimum 15 year period from the date of adoption, to anticipate and respond to long-term requirements and opportunities (para 22). If the LPR is adopted in the first quarter of 2023, there would be only 13 years remaining. The HBF consider that an appropriate plan period is 2020 – 2040. This recommendation should be considered by the Council.

HOUSING REQUIREMENT

As set out in the 2019 NPPF, strategic policy-making authorities should establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period (para 65). The determination of the minimum number of homes needed should be informed by a LHN assessment using the Government’s standard methodology unless exceptional circumstances justify an alternative approach (para 60). In Wiltshire, there are no exceptional circumstances to justify an alternative approach.

The NPPG sets out the standard methodology for calculating the LHN figure using demographic data (based on 2014 MHCLG Sub National Household Projections (SNHP)) and an affordability adjustment (based on the latest ONS affordability ratios) (ID 2a-004-20190220). Using the standard methodology, the Council have calculated the minimum LHN for Wiltshire is 2,042 dwellings per annum equivalent to 40,840 dwellings over the plan period 2016 – 2036. This calculation is based on 2014 SNHP, 2019 as the current year and 2018 affordability ratio of 9.82. As set out in the NPPG, the LHN is calculated at the start of the plan-making process but this number should be kept under review and when appropriate revised until the Local Plan is submitted for examination (ID 2a-008-20190220). The minimum LHN for the County may change as inputs are variable, which should be borne in mind by the Council.

The NPPG clearly states that the standard methodology is the minimum starting point in determining the number of homes needed. It does not produce a housing requirement figure (ID 2a-010-20190220). The NPPG explains that “circumstances” may exist to justify a figure higher than the minimum LHN (ID 2a-010-20190220). The “*circumstances*” for increasing the minimum LHN are listed in the NPPG, which include, but are not limited to, situations where increases in housing need are likely to exceed past trends because of growth strategies, strategic infrastructure improvements, agreeing to meet unmet need from neighbouring authorities or previous levels of housing delivery / assessments of need that are significantly greater than the outcome from the standard methodology (ID 2a-010-20190220).

The NPPG indicates that if previous housing delivery has exceeded the minimum LHN, the Council should consider whether this level of delivery is indicative of greater housing need (ID 2a-010-20190220). The 2020 Housing Delivery Test (HDT) Results identify housing completions of 2,406 dwellings in 2017/18, 2,766 dwellings in 2018/19 and 2,548 dwellings in 2019/20, which exceed the minimum LHN (2,042 dwellings per annum) as well as both adopted (2,100 dwellings per annum) and proposed (2,282 dwellings per annum) housing requirements.

The 2019 NPPF seeks to achieve sustainable development by pursuing economic, social and environmental objectives in mutually supportive ways (para 8). A lack of labour should not become a constraint on realising the economic growth potential of the County. The Council should be seeking to achieve a sustainable balance between employment and housing growth.

The Council should also recognise economic benefits of housing development in supporting local communities as highlighted by the HBF’s latest publication Building Communities – Making Place A Home (Autumn 2020). The Housing Calculator (available on the HBF website) based on The Economic Footprint of House Building (July 2018) commissioned by the HBF estimates for every one additional house built in Wiltshire, the benefits for the local community include creation of 3 jobs (direct & indirect employment), financial contributions of £27,754 towards affordable housing, £806 towards education, £297 towards open space / leisure, £1,129 extra in Council tax and £26,339 spent in local shops.

The NPPG states that total affordable housing need should be considered in the context of its likely delivery as a proportion of mixed market and affordable housing developments. As set out in the NPPG, an increase in the total housing figures may be considered where it could help deliver affordable housing (ID 2a-024-20190220). Affordable housing delivery should be a key priority for the Council. In the last decade housing affordability across the County has worsened from a median house price to workplace-based earnings ratio of 7.66 in 2009 to 9.63 in 2019, which is higher than in England (6.39 in 2009 / 7.83 in 2019) and in the South West (7.24 in 2009 / 8.79 in 2019). The ratio of 9.63 is a Wiltshire-wide figure, which may disguise a worse affordability ratio in individual Housing Market Areas (HMA) and / or towns, therefore the median house price of £257,000 may be much greater in rural areas. A housing requirement above the minimum LHN will make some contribution towards delivering a greater number of affordable housing even if not all affordable housing needs can be met.

The HBF consider that in Wiltshire, “circumstances” exist to justify a housing requirement above the minimum LHN. As set out in the Swindon & Wiltshire LHN Assessment 2019 by ORS dated April 2019, the minimum LHN has been adjusted for longer-term migration and economic forecasts resulting in a higher figure of 45,630 dwellings (2,282 dwellings per annum). This higher figure is proposed as the housing requirement. The Council’s sustainability appraisal assessment of alternative development strategies also concludes that there are no adverse effects of such significance that would prevent this higher figure being progressed as the basis for further work developing the spatial strategy.

As set out in the NPPG, the Government is committed to ensuring that more homes are built and supports ambitious Councils wanting to plan for growth (ID 2a-010-20190220). The NPPG states that a higher figure “*can be considered sound*” providing it “*adequately reflects current and future demographic trends and market signals*”. The HBF support the Council in identifying a housing need, which is greater than the minimum LHN. However, the NPPG does not set any limitations on a higher figure, which is a matter of judgement. The Government’s objective of significantly boosting the supply of homes set out in the 2019 NPPF remains (para 59). The HBF believe that the Council should have been more ambitious. The proposed housing requirement of 2,282 dwellings per annum is only 182 dwellings per annum above the adopted housing requirement of 2,100 dwellings per annum. Whilst the proposed housing requirement is greater than the minimum LHN of 2,042 dwellings per annum, it is below previous completion figures identified in the 2020 HDT. The proposed housing requirement is a “business as usual” scenario rather than a significant boost to the supply of homes. The Council’s housing requirement should be expressed as a minimum figure.

THE SPATIAL STRATEGY AND THE DISTRIBUTION OF DEVELOPMENT

The County has been sub-divided into four HMAs for Chippenham, Salisbury, Swindon (the Wiltshire part) and Trowbridge to which housing figures have been assigned as 20,400 dwellings, 10,975 dwellings, 3,255 dwellings and 11,000 dwellings respectively. The HBF note that the four proposed HMAs differ from the three previously defined HMAs of the adopted Wiltshire Core Strategy.

As set out above the Government’s standard methodology for calculating LHN establishes the Wiltshire-wide LHN. There is no standard methodology for sub-division set out in the NPPG. In the Swindon & Wiltshire LHN Assessment 2019, the Council has devised two alternative scenarios for disaggregation to the four identified HMAs based on 5 and 10 year migration trends. The disaggregated figures above represent alignment of future jobs / workers & housing and the 10 year migration trend. The HBF note that the Council’s chosen disaggregation scenario focusses most growth to the Chippenham HMA in comparison to the more evenly dispersed disaggregation if the 5 year migration trend scenario is used. When determining the distribution of growth, the Council should consider market capacity and deliverability.

The spatial strategy sets out the roles of settlements and the apportionment of growth to settlements. The settlement hierarchy set out in Core Policy 1 – Settlement Strategy of the adopted Wiltshire Core Strategy will not be changed by the LPR. This hierarchy comprises of Principal Settlements (Chippenham, Salisbury and Trowbridge), Market Towns (Amesbury, Bradford-on-Avon, Calne, Corsham, Devizes, Malmesbury, Marlborough, Melksham, Royal Wootton Bassett, Tidworth & Ludgershall, Warminster and Westbury), Local Service Centres, Large Villages and Small Villages. Growth will be focussed on the Principal Settlements and Market Towns. The LPR will set housing requirements for each main settlement (Principal Settlements & Market Towns) and designated areas for neighbourhood planning. Within the main settlements the housing requirement is translated into a brownfield target. The housing requirement for Local Service Centres and Large Villages will be disaggregated according to the size of the settlement and key constraints (see Appendix 1 of Empowering Rural Communities consultation document).

For the Chippenham HMA, after the deduction of completions and commitments the residual housing requirement (at 1 April 2019) is 9,860 dwellings. The LPR will set out how growth will be accommodated at Chippenham and Melksham, which will involve the allocation of greenfield sites. For the Salisbury HMA, after the deduction of completions and commitments the residual housing requirement (at 1 April 2019) is 2,655 dwellings.

The LPR will set out how growth will be accommodated at Salisbury and Amesbury, which will involve allocating greenfield sites. For the Swindon HMA, after the deduction of completions and commitments the residual housing requirement (at 1 April 2019) is 1,430 dwellings. The LPR will set out how growth will be accommodated at Royal Wootton Bassett, which will involve allocating greenfield sites. Elsewhere, there may be scope for Neighbourhood Plans to allocate sites to meet strategic requirements for housing. For Trowbridge HMA, after the deduction of completions and commitments the residual housing requirement (at 1 April 2019) is 3,205 dwellings. The LPR will set out how growth will be accommodated at Trowbridge and Westbury, which will involve allocating greenfield sites. Elsewhere, there may be scope for Neighbourhood Plans to allocate sites to meet strategic requirements for housing.

The Planning for Chippenham, Salisbury and Trowbridge Statements specify preferred sites. The Planning for Market Town Statements present reasonable alternative sites for consideration. In Market Towns, only a small number of site allocations will be needed, which may be either selected by local communities if they are progressing or reviewing a Neighbourhood Plan or the LPR. The role of rural settlements is set out in the 'Empowering Rural Communities' consultation document.

The HBF have no comments on individually identified sites but the correct assessment of availability, suitability, deliverability, developability and viability of these sites is critical. Assumptions on lapse rates, non-implementation allowances, lead in times and delivery rates contained within the overall HLS, 5 YHLS and housing trajectory should be realistic and supported by relevant landowners / promoters / developers.

The LPR's strategic policies should ensure the availability of a sufficient supply of deliverable and developable land to deliver the County's housing requirement. This sufficiency of housing land supply (HLS) should meet the housing requirement, ensure the maintenance of 5 Years Housing Land Supply (YHLS) and achieve HDT performance measurements. The Council's overall HLS should include a short and long-term supply of sites by the identification of both strategic and non-strategic allocations for residential development.

Housing delivery is maximised, where a wide mix of sites provides choice for consumers, allows places to grow in sustainable ways and creates opportunities to diversify the construction sector. There should be a wide range of sites by both size and market locations, which provides access to suitable land for small local, medium regional and large national housebuilding companies as well as providing opportunities for a wide range of different types of dwellings to meet the housing needs of all households.

The Council's overall HLS should also have sufficient flexibility to respond to changing circumstances, to treat the housing requirement as a minimum rather than a maximum and to provide choice and competition in the land market. There is no numerical formula to determine an appropriate contingency, but greater numerical flexibility is necessary where HLS is dependent on a few large strategic sites or locations than in cases where HLS is more diversified. The HBF always suggests as large a contingency as possible (at least 20%).

Under the 2019 NPPF, the Council should identify at least 10% of its housing requirement on sites no larger than one hectare or else demonstrate strong reasons for not achieving this target (para 68). For Wiltshire, 10% of the housing requirement is 4,563 dwellings. The Council should confirm compliance with this aspect of national policy.

GROWTH AND CLIMATE CHANGE

The Council is referred to the HBF's responses in the Addressing Climate Change and Biodiversity Net Gain through the Local Plan Consultation Response Form.

NEIGHBOURHOOD PLANNING

The LPR sets the strategic context for neighbourhood planning. Local communities will be encouraged to determine for themselves where additional development takes place by the preparation of a Neighbourhood Plan. However, as set out in the 2019 NPPF, Neighbourhood Plans should not promote less development than set out in the strategic policies for the area or undermine those strategic policies (para 29).

THE ROLE AND FUNCTION OF BROWNFIELD TARGET

Where Neighbourhood Plans are being prepared or reviewed in parallel to the LPR, the Council advocates that identified brownfield sites can be included in the HLS and a corresponding amount of land can be removed from the residual housing requirement thereby reducing the amount of greenfield land to be allocated. However, any identified brownfield sites should be robustly tested against the 2019 NPPF's definitions of deliverable and developable before inclusion in the HLS.

The Council proposes to set an indicative "Brownfield Target" for the number of new homes to be built on previously developed land (PDL). These Brownfield Targets will be used as the basis for housing requirements for designated neighbourhood areas at main settlements (Chippenham, Salisbury, Trowbridge, Amesbury, Bradford-on-Avon, Calne, Corsham, Devizes, Malmesbury, Marlborough, Melksham, Royal Wootton Bassett, Tidworth & Ludgershall, Warminster and Westbury). After adoption of the LPR, these figures should not be re-tested at Neighbourhood Plan examinations, unless there has been a significant change in circumstances affecting that requirement.

The Council's proposed policy approach is confusing for the following reasons :-

- a housing requirement should be based on a calculation of housing need. The brownfield target is derived from past windfall consents on PDL, which confuses housing needs with sources of HLS ;
- it is unclear how housing requirements for designated neighbourhood areas outside main settlements will be established ;
- there are different timeframes, the residual housing requirement is for the plan period 2016 – 2036 whilst the brownfield target is 2021 – 2031 ;
- any brownfield site identified to meet the brownfield target is a short to medium term development opportunity therefore the site must be deliverable rather than developable. A full assessment of suitability, availability, viability, etc should be undertaken to evidence deliverability.

The Council should not propose artificially phasing construction of large greenfield sites to ensure a priority is maintained on brownfield land. The 2019 NPPF's promotion of the effective use of land, in a way that makes as much use as possible of PDL (para 117) is not a brownfield first policy.

I wish to be notified of any future updates relating to the Local Plan Review:

YES: NO:

Clicking yes will add you to the planning policy contact database. This will mean you are kept informed of any future planning policy updates and consultations.

Further information on how the Spatial Planning Department treats your personally identifiable information can be found by reading the privacy notice available via the link below:

<https://www.wiltshire.gov.uk/planning-privacy-notice>

Here you will also find information about how and why your data may be processed and your rights under the Data Subject Information Notice section further down the page.

Signature: 

Date:

Thank you for completing this form.

Data Protection

Wiltshire Council has a duty to protect personal information and will process personal data in accordance with Data Protection legislation. The personal data you provide on this form will only be used for the purpose of the Wiltshire Development Framework. It may also be used for the prevention or detection of fraud or crime and in an anonymised form for statistical purposes. The data will be stored on computer and/or manual files. You have a right to a copy of your information held by any organisation, with some exemptions. To gain access to your personal data held by Wiltshire Council or if you have any Data Protection concerns please contact Wiltshire Council's Data Protection Officer on 01225 713000 (switchboard) or e-mail to dataprotection@wiltshire.gov.uk ."

STRAT175a



[REDACTED]

Spatial Planning
Economic Development & Planning
Wiltshire Council
County Hall
Trowbridge BA14 8JQ

spatialplanningpolicy@wiltshire.gov.uk

8 March 2021

Dear Sir/Madam

REPRESENTATIONS ON BEHALF OF KITWOOD IN RELATION TO LAND SOUTH OF DEVIZES ROAD, UPAVON (SITE SHELAA REF. 582)

We write on behalf of Kitewood Estates Ltd ('Kitewood') to make representations in relation to the Wiltshire Local Plan Review which runs to Tuesday, 9 March 2021.

The representation seeks to promote the allocation of site referenced 582 in the Council's Strategic Housing and Employment Land Availability Assessment (SHELAA) for housing. The site is shown on the SHELAA map for Upavon and the site assessment is available in the SHELAA 2017, Appendix 5.11 Pewsey) (see enclosed plan).

The circa 1.6985ha greenfield site has been identified as being suitable for development with an indicative development capacity of 62 dwellings in the SHELAA however, at the time of the assessment in 2017, the Council was unaware of its availability, so it was not regarded as a deliverable site. However, Kitewood wrote to the Council in February 2020 to confirm the Site's availability and this correspondence was acknowledged by the Council (see enclosed correspondence).

Kitewood is a privately owned development company and specialise in the delivery of bespoke residential and residential led mixed-use schemes in London and the wider South East. Kitewood intend to bring the site forward for housing development and consider it should be specifically allocated for housing in the Local Plan Review process. It would have a dwelling capacity of circa 50-65 dwellings and would be a logical extension to the existing settlement of Upavon – which is specified as a 'large village' in the existing Core Strategy and also in the 'Empowering Rural Communities' document produced as part of the Local Plan Review process.

Whilst it is understood from the Local Plan Review Spatial Strategy that the allocation of sites within large villages maybe a matter for Neighbourhood Plans, it is also stated that site allocations could take place in the context of the Local Plan Review itself. Kitewood would support the specific allocation of sites in large villages through the Local Plan Review process rather than necessarily await settlement allocations arising from a Neighbourhood Plan process that could significantly delay delivery of sites, which in principle can come forward in accordance with Local Plan Review policies. There appears to be no Neighbourhood Plan in place at Upavon so the specific allocation of housing sites in this Local Plan Review would be the most efficient way of allocating housing sites.



The current status of Upavon as a 'large village' within the Swindon Housing Market Area (emanating from the current Core Strategy) is supported by Kitewood. It is also important to emphasise that unlike the majority of settlements in the 'rest of' the Swindon HMA, Upavon is not located within the North Wessex Downs AONB. Whilst the settlement – being located on the river – does have areas of flood risk immediately adjacent to it running mainly north-south (as the SHELAA map indicates), much of the existing framework of Upavon and land outside it – including site 582 – is not the subject of any statutory environmental designation nor is it affected by high flood zone risk. Therefore, a logical extension to development in Upavon – on a proportionate basis – could take place on site ref 582 without encroaching upon either the AONB or land currently the subject to high flood zone risk.

The site benefits from a road frontage onto Devizes Road and it would not extend the western boundary of the settlement any further west than the A342. A landscape led masterplan approach could be taken to ensure that a housing proposal would be accompanied by quality open space provision, biodiversity enhancements and a significant planting buffer on the site boundaries could be installed to ensure the proposal would be appropriately screened.

In the context of the site being free from constraints and offering the opportunity to provide a proportionate increase to the size of Upavon, the key consideration in policy terms relates to the intention for the scale of provision of housing land in the Swindon HMA beyond the main settlements. In Kitewood's view the development of further housing land in large villages like Upavon is a sustainable means of meeting housing need throughout the HMA and more emphasis should be given to providing housing in the 'rest of' Swindon HMA in those settlements not within the AONB.

Comments on overall housing provision

The calculations that have been done in relation to the scale of overall housing requirement in Wiltshire – including that part of Swindon lying within Wiltshire – appear to be in accordance with the 2018 standard housing methodology figures which the Government now require local planning authorities to use as the basis for the calculation of housing requirements. These figures would require (as a minimum) Swindon Borough Council to provide 1,030 dwellings per annum in the 20 year Plan period 2016 to 2036 and Wiltshire Council to provide 2,006 dwellings per annum – a total of 3,036 dwellings per annum across both authorities. Therefore, the housing provision for Wiltshire Council in the Local Plan Review process to be consistent with the standard housing methodology based requirement would be a minimum of 40,840 dwellings. The lower and upper figures proposed arising from the Local Housing Market Area carried out is between 40,835 and 45,630 dwellings in the Plan period. Kitewood supports the use of the upper limit as a starting point for the distribution of housing requirements within each relevant area.

The table in paragraph 19 of the emerging Spatial Strategy relating to the Swindon Housing Market Area sets out the strategy for meeting its housing requirements on the basis of focusing on Royal Wootton Bassett with no further development beyond existing commitments west of Swindon and constraints around Marlborough. This is the preferred option B in paragraph 3.65.

Option C was also tested which was to focus growth on the rest of the HMA (including Marlborough) with development reduced at Royal Wootton Bassett and no further development beyond existing commitments west of Swindon. This option was not pursued because of concerns about impact on landscape, heritage and transport outside the urban areas and the potential for expansion at Swindon.



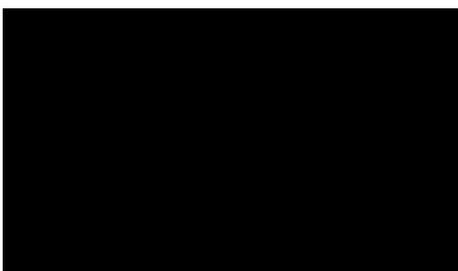
On this basis, the table following paragraph 3.77 seeks to provide 3,450 dwellings in the 20 year Plan period in the Swindon HMA with concentration at Royal Wootton Bassett (1,255 dwellings); 680 dwellings in Marlborough, 435 dwellings west of Swindon and 1,080 in the rest of the HMA – including Upavon.

Kitewood considers the Council should rethink this strategy. More emphasis should be given to housing growth being allowed in settlements in the ‘rest of’ the HMA – including large villages like Upavon – that are not affected by the landscape and other impacts which caused option 3 not to be pursued. A potential transfer of housing from Royal Wootton Bassett to other settlements should be considered.

Kitewood is concerned to ensure that the delivery of houses within the larger settlements is going to be realistic. It notes that the delivery rates in the rest of the HMA are reduced in the proposed Local Plan Review period compared to the Core Strategy (from 1,225 to 1,080 per annum); Marlborough is the same (680 in each case); west of Swindon is reduced and Royal Wootton Bassett increased. In Kitewood’s view the Council should look at the capacity of specific settlements lying in the rest of the HMA and propose sites for allocation to provide certainty that the rest of HMA figure can be delivered and in settlements which are free from environmental constraints.

On this basis, Kitewood request that the Council reconsiders the site ref 582 at Upavon and proposes its specific allocation for housing through the Local Plan Review process. The site is **unconstrained** by AONB, Flood Risk or any other environmentally sensitive designation, it is controlled by an experienced developer and can come forward without delay. Furthermore, it is imperative that the rest of the HMA housing requirement for the Swindon HMA is delivered and sustainable allocations are made now to ensure a robust housing land supply.

Yours faithfully
for SC5 Planning



STRAT175b

From: [MonitoringandEvidence](#)
To: [REDACTED]
Subject: RE: Land south of Devizes Road, Upavon (SHLAA REF:582)
Date: 26 February 2020 10:38:44
Attachments: [image001.jpg](#)
[image003.png](#)
[image004.gif](#)
[image005.png](#)

Hi [REDACTED]

I can confirm receipt of the e-mail and that we have updated our records to reflect the information that you have provided.

Apologies if you did not receive our first response to this sent on the 13/02/2020.

Kind Regards

[REDACTED]
Economic Development and Planning



Tel: 01225 713223

Email: MonitoringandEvidence@Wiltshire.gov.uk

Web: www.wiltshire.gov.uk

Follow Wiltshire Council



[Sign up](#) to Wiltshire Council's email news service

From: [REDACTED]
Sent: 24 February 2020 17:18
To: MonitoringandEvidence <MonitoringandEvidence@wiltshire.gov.uk>
Subject: RE: Land south of Devizes Road, Upavon (SHLAA REF:582)
Importance: High

Dear sir/ madam,

Please can you confirm receipt of the email below.

Kind regards,

[REDACTED]

[REDACTED]
[REDACTED]



*Any offers contained in this email are Subject to Contract and are without prejudice.
Kitewood Estates Ltd is registered in England with number 02852063. The Company's registered address is 85
Gracechurch Street London EC3V 0AA*

From: [REDACTED]

Sent: 12 February 2020 13:30

To: spatialplanningpolicy@wiltshire.gov.uk; monitoringandevidence@wiltshire.gov.uk

Subject: Land south of Devizes Road, Upavon (SHLAA REF:582)

Importance: High

Dear Sir/ Madam,

I understand that the Council is in the process of preparing the evidence base in relation to the new Local Plan.

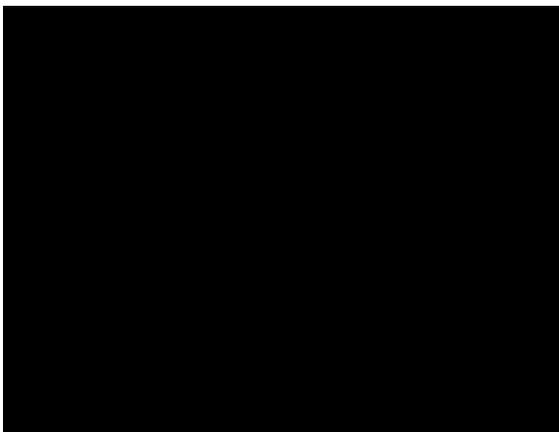
I write to confirm that Kitewood control the land to the south of Davizes Road, Upavon (SHLAA REF: 582) and that it **is available** for development.

Kitewood is a privately owned property development company and we will be promoting the site through the forthcoming Local Plan consultation stages.

Please confirm receipt of this correspondence and confirm that the SHLAA Assessment will be updated to reflect this information.

Do let me know if you require any further information.

Kind regards,





*Any offers contained in this email are Subject to Contract and are without prejudice.
Kitewood Estates Ltd is registered in England with number 02852063. The Company's registered address is 85
Gracechurch Street London EC3V 0AA*

This email originates from Wiltshire Council and any files transmitted with it may contain confidential information and may be subject to Copyright or Intellectual Property rights. It is intended solely for the use of the individual or entity to whom they are addressed. If you have received this email in error please notify the sender and delete the email from your inbox. Any disclosure, reproduction, dissemination, modification and distribution of the contents of the email is strictly prohibited. Email content may be monitored by Wiltshire Council to ensure compliance with its policies and procedures. No contract is intended by this email, and any personal opinions expressed in this message are those of the sender and should not be taken as representing views of Wiltshire Council. Please note Wiltshire Council utilises anti-virus scanning software but does not warrant that any e-mail or attachments are free from viruses or other defects and accepts no liability for any losses resulting from infected e-mail transmissions. Receipt of this e-mail does not imply consent to use or provide this e-mail address to any third party for any purpose. Wiltshire Council will not request the disclosure of personal financial information by means of e-mail any such request should be confirmed in writing by contacting Wiltshire Council.

STRAT176

WILTSHIRE LOCAL PLAN REVIEW

Land East of Devizes

Representation on consultation of the emerging Wiltshire
Local Plan Review 2016 - 2036

Prepared by Pro Vision on behalf of Hills UK Ltd.

March 2021

LAND EAST OF DEVIZES
WILTSHIRE LOCAL PLAN REVIEW
PROJECT NO. 2337

PREPARED BY:



CHECKED BY:



DATE:

MARCH 2021

PRO VISION
THE LODGE,
HIGHCROFT ROAD,
WINCHESTER,
SO22 5GU

COPYRIGHT: The contents of this document must not be copied or reproduced in whole or in part without the prior written consent of Pro Vision.

CONTENTS

1.0 Introduction 1

2.0 Emerging Strategy 3

3.0 Planning for Devizes 8

4.0 Land East of Devizes 11

5.0 Conclusion 18

APPENDICES

Appendix A - Site Location Plan 19

Appendix B - Site Promotion Document 21

1.0 Introduction

1.1 This representation is made on behalf of Hills UK Ltd. in relation to their land interests on the eastern edge of Devizes. It is in response to Wiltshire’s consultation on the emerging Wiltshire Local Plan Review (LPR) to 2036.

1.2 Our client’s interest extends across three distinct parcels (see Site location Plan at **Appendix A**):

- 1) East of Windsor Drive (not identified in the SHELAA or ‘Planning for Devizes’);
- 2) North of Brickley Lane (SHELAA Ref: 624 or Site 3 ‘Planning for Devizes’); and
- 3) Broadway Farm (SHELAA Site Ref: 524 or Site 4 ‘Planning for Devizes’)

1.3 It appears that the land shown as 1) on the Site Location Plan has not been identified or assessed in the SHELAA and/or the documents related to this consultation. The wider site has previously been put forward to Wiltshire Council (‘the Council’) for development and, therefore, its omission appears to be an oversight. Indeed, as part of the Housing Site Allocations DPD in September 2017, a Site Promotion Document was submitted to the Council to demonstrate the suitability of the three parcels for development.

1.4 In response to the Council’s consultation on the Local Plan Review this current representation:

- highlights a need to review the emerging strategy and focus of development at Chippenham to deliver the overall housing need in the HMA, including delivering additional growth at Devizes;
- explains that the Council needs to identify further sites to reduce any potential housing shortfall from the anticipated housing supply; and
- sets out the sets out the opportunity to allocate the ‘Land east of Devizes’ for a residential development.

1.5 This representation is supported by the following documents:

- Site Location Plan - **Appendix A**; and
- Site Promotion Document – East of Devizes (September 2017) – **Appendix B**

1.6 In order to consider whether a Local Plan is sound, reference needs to be made to the National Planning Policy Framework ('the Framework') paragraph 35. This identifies that a sound Plan is:

- a) **Positively Prepared** – 'providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development';
- b) **Justified** – 'an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence';
- c) **Effective** – 'deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground'; and
- d) **Consistent with National Policy** – 'enabling the delivery of sustainable development in accordance with the policies in this Framework'.

1.7 Whilst, at this stage, we consider that the Local Plan Review is unsound, we have provided some recommendations to ensure that the Plan is made more robust.

2.0 Emerging Strategy

Context

- 2.1 The Framework requires that the minimum number of homes needed should be determined by a local housing need assessment, conducted using the standard method in national planning guidance unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for (paragraph 60).
- 2.2 It is noted that the housing need has been calculated in two ways: a lower figure using the national standard method and a higher figure using the local housing need assessment. The Emerging Strategy Paper confirms that in the Chippenham Housing Market Area (HMA) - within which Devizes is located - the lower and upper figures are as follows:

Housing Market Area	Standard Method (Additional dwellings 2016-2036)	Local Housing Need Assessment (Additional dwellings 2016-2036)
Chippenham	17,410	20,400

Alternative Development Strategies

- 2.3 Devizes is noted as a ‘Market Town’ within the Chippenham Housing Market Area. The settlement hierarchy (not being reviewed) confirms that *‘Market Towns have the potential for significant development that will increase the number of jobs and homes to help sustain/enhance services and facilities and promote self-containment and sustainable communities’*.
- 2.4 The Emerging Strategy Paper proposes three development strategies within the HMA to meet the upper housing market figure. These include: the rolling forward of the Core Strategy pattern of distribution (CH-A); expanding Chippenham (CH-B) and a Melksham focus for development (CH-C).
- 2.5 The Emerging Strategy Paper is not a direct choice of one strategy. However, the strategy includes a strong focus of growth at Chippenham (i.e. option CH-B). In regard to Devizes, the proposed strategy leads to a smaller proportion of growth. The Emerging Strategy Paper

explains that the level of environmental constraints and the scale of growth proposed to be directed to Chippenham and (in part) Melksham provides scope to do this.

- 2.6 It is considered that the Council's emerging strategy is flawed and there is a need for higher housing growth at Devizes.

Critique

Focus of development to Chippenham

- 2.7 The adopted Wiltshire Core Strategy (2015) identifies a requirement at Chippenham for 4,510 new homes (225 dpa). The emerging strategy proposes a requirement of 9,225 new homes for the plan period 2016-2036 (461 dpa); more than doubling the scale and rate of housing growth.
- 2.8 The Emerging Strategy Paper confirms that the residual requirement for Chippenham is 5,100 new homes using the emerging strategy. The 'Planning for Chippenham' Paper explains that both the Local Plan and a Neighbourhood Plan can allocate sites for development. The 'Planning for Chippenham' Paper identifies two new suburbs to Chippenham and combines sites to deliver approximately 5,500 new homes.
- 2.9 It is noted that the Council, at this stage, has not provided the expected rate of housing delivery over the plan period through a housing trajectory. Nevertheless, the 'Planning for Chippenham' Paper acknowledges that the size of these areas is likely to see construction beyond the end of the plan period (i.e. 2036).
- 2.10 The market evidence demonstrates that for schemes of 2,000+ dwellings, the lead-in time from validation of an application through to first completions is approximately 8.4 years (Source: Lichfield's Start to Finish (2nd Edition), February 2020). As such, given the timescales for the adoption of the Plan (i.e. Q2 2023 in the LDS) and taking the view that the planning application for the site is submitted by Q2 2024, first completions cannot be projected before Q4 2032/Q1 2033. Further, this timescale may be optimistic if there are delays to the adoption of the Plan, complications due to multiple landowners, and/or any delays to the potential delivery of a new distributor road to the south/east of Chippenham.
- 2.11 Accordingly, it is considered that the Council should take a cautious approach with the strategic sites identified as potentially delivering housing supply towards the latter end of the plan period. The Lichfield's Start to Finish (2nd Edition) provides market evidence that the

average annual build rate for a scheme of 2,000+ homes is 160 dwellings per annum (dpa). The median is 137 dpa. Delivering completions in the last four/five years of the Plan across both strategic sites would therefore equate to, at best, 1,600 new homes during the plan period. This means that the Chippenham Neighbourhood Plan (CNP) would need to find sites for around 3,500 new homes to meet its housing target based on the current emerging strategy. This is clearly not a reasonable option given the land opportunities available in Chippenham over the plan period.

- 2.12 Further, it is considered that the Council's emerging strategy would not meet the minimum housing requirement of 17,410 new homes. Taking the view that the same 45% of the total HMA growth is directed towards Chippenham, the minimum housing need is 7,834 new homes and results in a residual requirement of 4,100 new homes. Therefore, even with the delivery of c. 1,600 homes from the strategic sites, there would be a need to identify sites for a further 2,500 new homes in the CNP. The doubling of the scale and rate of growth at Chippenham during the plan period therefore appears impractical.
- 2.13 With the above in mind, the Council's emerging strategy would lead to a significant housing shortfall across the wider HMA given the reliance on housing delivery at Chippenham to meet its overall housing need.

Devizes & Housing Growth

- 2.14 In the Emerging Strategy Paper, at paragraph 3.3, it is suggested that the level of environmental constraints at certain settlements within the HMA - including at Devizes - should lead to a smaller proportion of growth. The Emerging Strategy Paper demonstrates that at Devizes the housing requirement is reduced from 2,010 (101 dpa) new homes in the Core Strategy to 1,330 (67 dpa) new homes in the emerging strategy.
- 2.15 The Formulating Alternative Development Strategies (FADS) – Chippenham HMA Paper (January 2021) explains that at Devizes the main constraints are regarding protection of bats, the town being constrained by the Area of Outstanding Natural Beauty (AONB) and potential impact on heritage. Further, air quality and traffic congestion have been raised as concerns.
- 2.16 However, none of these environmental constraints preclude the principle of residential development (different to floodplain, Green Belt etc.), but instead will shape the form and direction of growth at Devizes. As such, there is no justification to identify such a reduction in housing growth during the plan period.

- 2.17 Further, the Council’s Interim Sustainability Appraisal (January 2021) does not appear to have appropriately assessed the environmental constraints. For example, it does not consider the uptake of electric cars during the plan period and a consequential improvement in air quality. The Government’s Ten Point Plan for a Green Industrial Revolution (November 2020) has brought forward the ban of the sale of new petrol, diesel and most hybrid cars to 2030 and, therefore, it will likely have a positive benefit on air quality at Devizes during this plan period.
- 2.18 The FADS – Chippenham HMA Paper identifies a significant need for affordable housing at Devizes (higher than anywhere else in the HMA). This is evidenced by preferences on the Council’s housing register. The Council therefore should be concerned that limiting the housing supply at Devizes will raise house prices to levels which create cost barriers to local residents and workers and constrain the provision of new affordable homes. As a result, not adequately addressing the need for affordable housing at Devizes in this plan period could have significant social and economic consequences which does not appear to have been appropriately assessed in the SA.
- 2.19 Accordingly, it is unclear how the Council’s preferred emerging strategy ensures that Devizes maintains its position as a ‘Market Town’ in accordance with CP 1 of the Core Strategy. Devizes is one of the key ‘Market Towns’ within the HMA and has a good range of job opportunities, high order services, including retail, leisure and health facilities and has good public transport links. Therefore, given the range of services it currently offers, Devizes can accommodate significant growth. Furthermore, there is sufficient capacity for growth without any adverse environmental impacts (see Section 3 for further details). The delivery of significant growth at Devizes will support and enhance existing facilities and services, support local businesses, and provide new affordable homes where they are needed.

Conclusion

- 2.20 With the above in mind, it is considered that the Council’s emerging strategy for the Chippenham HMA is flawed, as follows:
- it is insufficient to support the Government’s objective of significantly boosting the supply of housing;
 - it is over-relying on a significant step change in housing delivery at Chippenham which cannot be realistically delivered during the plan period;

- the housing provision during the plan period for the strategic allocations at Chippenham is limited;
- there is no justification that the environmental constraints at some settlements - such as at Devizes - necessitate lower housing growth; and
- the lower housing growth at Devizes could impact on the town's ability to maintain its status as a key 'Market Town', as well as not delivering a need for new affordable housing.

2.21 The emerging strategy for the Chippenham HMA should seek to reduce the focus of housing growth at Chippenham as it is not deliverable. As such, provision should be made to increase the growth at the other main settlements in the HMA, including at Devizes to ensure that the overall housing need is delivered.

3.0 Planning for Devizes

Context

- 3.1 The 'Planning for Devizes Paper' (January 2021) identifies that 370 dwellings have been built between 2016 – 2019, and, at 1st April 2019, 629 homes are already in the pipeline (i.e. they have permission, resolution to grant, or are allocated in the Devizes Neighbourhood Plan).
- 3.2 The current emerging strategy proposes a requirement of 1,330 homes for the plan period (although as explained at Section 2 above this needs to be increased). Accordingly, when the number of homes built and the suggested pipeline are deducted it leaves a further 330 homes to be accommodated up to 2036.
- 3.3 It is acknowledged that the Local Plan and DNP can allocate for development. The Paper explains, at Paragraph 12, that the strategic housing need in the town will currently be met through the Local Plan.

Critique

Devizes 'Scale of Growth'

- 3.4 The 'Planning for Devizes' Paper acknowledges that 182 dwellings allocated in the DNP have not progressed since it was 'made' in 2015. The history of these sites identified in the supply that do not currently have planning permission clearly does not support confidence in their timely delivery.
- 3.5 The Council's Housing Land Supply Statement (December 2020) does not anticipate the delivery of any new homes (up to 2026) from sites allocated in the DNP for around 70 dwellings. There are also several sites in the Council's HLS Statement that do not appear to deliver the expected quantum of housing up to 2026, including Wadworth Warehouse (5 homes instead of 30), Stonebridge House (3 homes instead of 14) and land off Hillworth Road (15 homes instead of 47).
- 3.6 What's more, these figures are before an assessment of individual sites suitability for development, with many of these sites being active employment sites or having site-specific concerns, such as landscape and/or topography issues. Accordingly, it is considered that the Council should take a cautious approach and exclude all these sites from the housing supply.

- 3.7 Furthermore, Azzire Court is included in the housing supply but no dwellings have been committed as at 1st April 2019. The planning history of the site suggests that there are significant viability issues to development (as evidenced in previous Officer's reports). Thus a further 18 dwellings should be removed from the Council's pipeline at Devizes.
- 3.8 The pipeline housing supply for Devizes should therefore be reduced by approximately 200 units to 429 homes.
- 3.9 As set out at Section 2, we consider that the emerging strategy is flawed and there is a need for additional growth to be directed towards Devizes. Notwithstanding this, there will still be a housing shortfall given the assessment of the Council's housing supply. Using the Council's preferred emerging strategy, the residual housing requirement at Devizes is considered to be around 531 new homes (rather than 330 new homes).
- 3.10 With the above in mind, given the need for additional growth at Devizes, the Local Plan will need to identify new strategic development on greenfield land. The DNP and housing pipeline demonstrates that the delivery of smaller, predominantly brownfield sites within the built-up area of Devizes has been challenging and would likely lead to a further shortfall of housing supply at Devizes.

Strategic Direction of Growth at Devizes

- 3.11 With regards to direction of growth, it is acknowledged that the North Wessex Downs AONB is located to the north and east of the town. Nevertheless, the topography to the east of Devizes (owing to a landform) performs a role in providing a significant degree of containment to the land near the urban edge. Therefore, it is considered that there is capacity for further growth to the east of Devizes without adversely impacting on the AONB or its setting.
- 3.12 By contrast development to the north of Devizes has 'key views' to/from Roundway Hill and Devizes White Horse, as well as the impact on the setting of the AONB. The west of Devizes is constrained by its historical landscape setting close to the Scheduled Monument (Caen Hill Locks) and Devizes Castle. The south of Devizes is constrained by intrusion into an open landscape with distant views.
- 3.13 As acknowledged in the Devizes Site Selection Report (January 2021), the A361 suffers from significant transport congestion and delays. Accordingly, all the housing growth should not be directed to sites that rely on sole access onto the A361 (mostly sites to the north of Devizes).

- 3.14 The DNP noted that local residents highlighted a preference for new development close to schools to reduce vehicular movements and encourage active transport (e.g. cycling and walking). Accordingly, there is an opportunity to focus development around the Nursteed Community Primary School to the east of Devizes. There appears to be no other land opportunities at Devizes to achieve this elsewhere.
- 3.15 Further, it is noted that the Department for Transport is funding a study into the potential for a new rail station along the Reading – Taunton line called ‘Devizes Parkway’ at Lydeway (accessed from the A342). Whilst the project is at inception, it follows that the direction of growth at Devizes should be towards the south-east/east of Devizes with suitable access onto the A342 and any potential rail station. This follows the Government’s ‘direction of travel’ in their Ten Point Plan for a Green Industrial Revolution (November 2020) by restoring historic rail links to give people the choice not to drive.
- 3.16 Figure 3 Map of the ‘Planning for Devizes’ Paper clearly demonstrates that the east of Devizes is less constrained with regards to biodiversity and heritage designations.
- 3.17 With the above in mind, it is considered that the Council should principally be directing growth to the east of the town where it is reasonably environmentally unconstrained with capability to deliver significant housing growth at Devizes.

Conclusion

- 3.18 As explained at Section 2, it is considered that the Council will need to identify further growth at Devizes. Notwithstanding this, the Council’s proposed housing supply will lead to a significant housing shortfall given the uncertainty regarding the deliverability of several sites (i.e. particularly those sites not advanced from allocation in the DNP).
- 3.19 The Council will need to identify strategic sites in the Local Plan to meet the additional housing requirement. On the face of it, it appears that Devizes can accommodate significant growth without any environmental impacts by directing growth to the right places. In this respect, it is considered that the east of Devizes can accommodate significant growth.

4.0 Land East of Devizes

4.1 Hills UK Ltd. welcome the inclusion of their 'land east of Devizes' (albeit, as explained at Section 1 this currently excludes part of the land) in the selection of the "pool" of sites.

4.2 A Promotion Document for 'East of Devizes' was submitted to the Council in 2017 in response to the Housing Site Allocations DPD (See Appendix B). The Promotion Document sets out a Vision to create three distinct neighbourhoods each with individual benefits but together delivering substantial open space and green infrastructure as a comprehensive and integrated extension to Devizes.

4.3 The two development framework options in the Promotion Document demonstrate that 'East of Devizes' can deliver:

- between 250-300 new homes, increasing the choice of homes and providing affordable ownership options in addition to family housing in a high quality environment;
- a small neighbourhood centre adjacent to the existing primary school. Without prejudice, this could provide opportunities for community/retail, education (e.g. nursery) and/or health care facilities;
- be integrated into Devizes town, connecting the proposals with the town centre via footpaths and cycle routes to encourage walking and cycling, and hence reducing traffic in the town centre;
- an extensive network of open spaces linked by green infrastructure; and
- opportunities for multiple and overlapping typologies of open space including play areas (linked by footpaths and cycleways), parkland, pockets of amenity parks, street planting, green corridors, and natural habitats for biodiversity.

Suitability of 'East of Devizes'

4.4 The Council's 'Planning for Devizes' Paper notes the key considerations of the land included in the "pool" of sites. In respect of our client's interest at 'East of Devizes', we comment as follows:

Landscape

- 4.5 The Council's 'Planning for Devizes' Paper notes that North of Brickley Lane (identified as Site 3 or SHELAA ref: 624) is *'part of a gentle Part of a gentle hill rising to the east of the town, the site has medium landscape sensitivity with higher sensitivity to the north of the site. Any development should be located away from the most sensitive areas'*.
- 4.6 The Council's 'Site Selection Report for Devizes' (January 2021) scores the parcel as 'green' for landscape acknowledging that the site is well screened, and the landform helps to shield it from most views. It is generally only visible from Windsor Drive, which is not a sensitive view.
- 4.7 The Promotion Document demonstrates that some residential development is possible on the lower southern part of this parcel. New structural planting can further strengthen the existing tree and hedgerow belts creating new ecological links. The remaining land can be utilised for open space (e.g. parkland) and provides a new green link to the wider countryside.
- 4.8 The Council's 'Planning for Devizes' Paper explains that Broadway Farm (identified as Site 4 or SHELAA ref: 524) is *'located at the base of a sloping landform, consideration would need to be given to development being prominent on a rising landform and potential impact on the rural setting to the town'*.
- 4.9 The Council's 'Site Selection Report for Devizes' also scores this parcel as 'green' acknowledging that it is well screened by extensive tree planting from Windsor Drive to the west and by landform to the east.
- 4.10 The parcel, being set down below steep downland slopes, is well contained in views from the north, east and south-east. The Promotion Document proposes new structural landscaping along the southern and eastern edge of the parcel and extensive areas of new green space. Again, a new central green link is created to link Devizes to the wider countryside.
- 4.11 Whilst the parcel 'East of Windsor Drive' has not been assessed by the Council, the parcel abuts Windsor Drive and is visually connected to the existing residential development on the opposite side.
- 4.12 The development framework options show that there will be localised benefits in respect of the enhancement of the current green infrastructure within and around the 'the East of Devizes'. These benefits will be further enhanced by the proposed extensive additional green

infrastructure. The green infrastructure will also provide a strong landscape buffer to define the edge of the settlement.

Access and Highway Impact

Sustainable Transport

- 4.13 The site is in an accessible location on the edge of Devizes. There are good quality bus services to the centre of Devizes (and beyond) within walking distance of the site. The town centre (with its services and facilities) is also only a 10-15 minute walk or 3-5 minute cycle.
- 4.14 Furthermore, it is envisaged that each new home would be provided with an EV Charging point (or access to a communal point where appropriate). This will seek to encourage the uptake of electric vehicles ahead of the Government's ban on the sale of petrol and diesel cars in 2030. Indeed, the Framework defines low and ultra-low emission vehicles (such as electric vehicles) as a 'sustainable transport mode'.
- 4.15 The potential train station at Lydeaway would be accessed via the A342. The site can easily access the A342 via Windsor Road and/or any future cycle and bus links to the station. This would potentially offer a wider range of destinations and an alternative to the private car.

Pedestrian and Cycleway Links

- 4.16 The site can directly connect to the existing network of footpaths and cycleways that permeate through south east Devizes (and which link the Town Centre with the wider countryside).
- 4.17 The site is near a number of local facilities, including being immediately adjacent a primary school and close to shops and transportation links. The good standard of footways in this location provide safe walking routes to key local services and facilities. The sustainable location of the site will help reduce reliance on the private car and encourage active transportation (e.g. walking or cycling) and/or use of public transport.

Access

- 4.18 The Promotion Document and development framework options demonstrate that a new access junction from Brickley Lane can serve 'North of Brickley Lane' and the northern part of Broadway Farm. A second vehicular access can be accessed from Windsor Drive to serve the

southern section of Broadway Farm. At 'East of Windsor Drive' the existing field gate access can be upgraded and utilised.

Impact on the wider road network

4.19 It is considered that the proposed development of the wider site for up to 300 new homes will not cause any detrimental impact to the wider road network. The site is not accessed directly off the congested A361 and the distribution of vehicular movements will benefit from access to various main routes around Devizes.

4.20 Further, it is considered that planning for larger scale development, such as the development of the wider site, will help deliver improvements to local transport infrastructure.

Air Quality and Traffic

4.21 The location of the site provides an opportunity to reduce exposure in this area and encourage residents to take active methods of transport (i.e. walking and cycling) and /or use of public transport.

4.22 Again, as explained above, the proposed development would offer EV charging points to encourage the uptake of electric vehicles (ahead of the ban of the sale of petrol and diesel cars in 2030) which will also over time improve the air quality at Devizes.

Flood Risk/Drainage

4.23 The site is located within Flood Zone 1 (low probability of flooding). It is considered that the development of the site will not increase flood risk and a suitable drainage surface water strategy can be delivered at the site to include SuDS features (e.g. attenuation ponds/basins) and ecological enhancements, as shown on the development framework options.

Biodiversity and Green Infrastructure

Biodiversity

4.24 The Promotion Document demonstrates that the proposed development is seeking to retain key ecological corridors which will maintain habitat for species which may move across the landscape.

- 4.25 The site has the capacity to provide ecological enhancements for the area with the creation of new ponds, incorporation of bird and bat boxes within the buildings and the creation of wildflower grasslands. The combination of new grassland, strengthened green corridors and waterbodies will provide additional habitat for invertebrates which will provide additional foraging for bats, birds, mammals, amphibians and reptiles.

Potential for new Green Infrastructure

- 4.26 The site provides an opportunity to create extensive new areas of public open space, parkland, play spaces, green corridors, and new habitat creation within the enhanced green infrastructure framework creating a 'green legacy' for Devizes. This will benefit existing and future residents' health and wellbeing and enhance biodiversity.

Heritage

Nursted Farm

- 4.27 The Council's 'Planning for Devizes' Paper acknowledges that the southern part of Broadway Farm needs to take account of the Grade II Listed Nursted Farm. However, the development framework options demonstrate that there would be a significant buffer to the heritage asset which will maintain its historic setting. Further, if necessary, the built development can be offset further from that southern boundary.
- 4.28 Therefore, given the above, we consider that the Council should look more favourably on the proposed development with regards to heritage as it seeks to protect and conserve Nursted Farm's historic setting.

Archaeology

- 4.29 The Council's 'Planning for Devizes' Paper notes that '*ditches on site could indicate medieval activity and further investigation would be needed*' at North of Brickley Lane. An archaeological report will be prepared to assess the archaeological potential of the and, if appropriate, further field observation would be undertaken. Notwithstanding this, the potential archaeology would not preclude development of the site for residential development.

Local Infrastructure

- 4.30 The Council's 'Planning for Devizes' Paper notes that additional land may be required to expand the existing primary school adjacent to the site.
- 4.31 The development of the wider site is of a scale that can, if required, provide a land resource for an expanded school as well as provide commensurate support for other infrastructure types identified.

Objectives of Wiltshire Council/Devizes Town Council

- 4.32 The allocation of the wider site would accord with Wiltshire Council's and Town Council's Vision for Devizes including:
- access to services and facilities locally;
 - supporting and enhancing the vitality of Devizes as a Market Town;
 - meeting the housing needs for everyone, including providing a mix of different types and tenures of new homes (e.g. affordable housing);
 - contributing to a high quality built and natural environment, including maximising opportunities for enhancing the existing Green Infrastructure network (i.e. new open space and green spaces) benefitting health and wellbeing and biodiversity;
 - minimising the need to travel and maximising the use of sustainable transport, including being located immediately adjacent a primary school; and
 - adapting to the effects of climate change.

Availability of 'East of Devizes'

- 4.33 The site is available for a residential development immediately. Parcels 1) and 2) are currently owned by Hills. Parcel 3 'Broadway Farm' is being jointly promoted by Hills and the landowner. Accordingly, this will facilitate its timely development early in the plan period.

Achievability of 'East of Devizes'

- 4.34 The site is considered to be 'achievable' for the reasons set out below:

- There is a need to identify additional housing within the Chippenham HMA - including at Devizes - to meet the indicative housing requirements during the plan period.
- The site is greenfield - therefore it is likely that there are no significant constraints (such as contamination) which would preclude development of the site on viability grounds.
- The site is being promoted by a regional housebuilder with ample experience of delivering development within Wiltshire.

Summary

4.35 There are no insurmountable constraints that would prevent the delivery of 'East of Devizes' for residential development around 250-300 new homes. The site is therefore suitable, available and achievable for residential development which can help Wiltshire meet the identified housing need in a timely and sustainable manner. Accordingly, we are of the view that the Council should consider our client's land on the eastern edge of Devizes (combining the three distinct parcels) for allocation in the Local Plan Review.

5.0 Conclusion

5.1 Hills UK Ltd. has concerns that the Council's emerging strategy with regards to the Chippenham HMA and Devizes is currently unsound. However, we have provided some recommendations to make the Plan more robust and to ensure that the Council's deliver its housing strategy. These include:

- reducing the focus of housing growth at Chippenham as the 'step change' in delivery is not deliverable;
- increasing the housing requirement at the other main settlements in the HMA – including at Devizes - to ensure that the overall housing need is delivered; and
- re-evaluating Devizes as a suitable location that can accommodate additional growth without any significant environmental impacts by directing growth to the right places.

5.2 It is considered that that the Council should principally be directing growth to the east of the town where it is reasonably environmentally unconstrained with capability to deliver significant housing growth at Devizes.

5.3 With the above in mind, our client's land on the eastern edge of Devizes should be considered for allocation in the next version of the Local Plan Review. This Statement demonstrates that there are no significant technical, physical, or environmental constraints that would prevent development of the wider site and its delivery. There is an opportunity to develop this site to create three distinct neighbourhoods each with individual benefits but together delivering substantial open space and green infrastructure as a comprehensive and integrated extension to Devizes. Further, the site for 250-300 new homes can deliver housing in line with local objectives such as need for affordable housing.

5.4 We trust this Statement clearly sets out our client's position at this stage. Hills would welcome early discussions with the Council to discuss the opportunity of their land on the eastern edge of Devizes.

Appendix A – Site Location Plan

Appendix B – Site Promotion Document



EAST OF DEVIZES

SITE PROMOTION DOCUMENT

SEPTEMBER 2017

EAST OF WINDSOR ROAD, DEVIZES

Site Promotion Document

Project no. 2337

Prepared on behalf of Hills Homes Developments Ltd

Prepared by:

Carol Darling, BA (hons), MRTPI

Urban Designer

Prepared by:

Steven Smallman, MRTPI, MRICS

Director (Planning)

Issue	Date	Status	Checked
1	13.09.17	ISSUE	SS

COPYRIGHT:

The contents of this document must not be copied or reproduced in whole or in part without the prior written consent of pro vision.
All plans are reproduced from the Ordnance Survey © Crown Copyright 2017. All rights reserved. Licence number 100022432

CONTENTS

Introduction	1
Planning Policy Context	2
Contextual Analysis	4
Site Assessment	10
The Concept	12
Development Framework Option 1	16
Development Framework Option 2	18
Key Benefits	22

INTRODUCTION

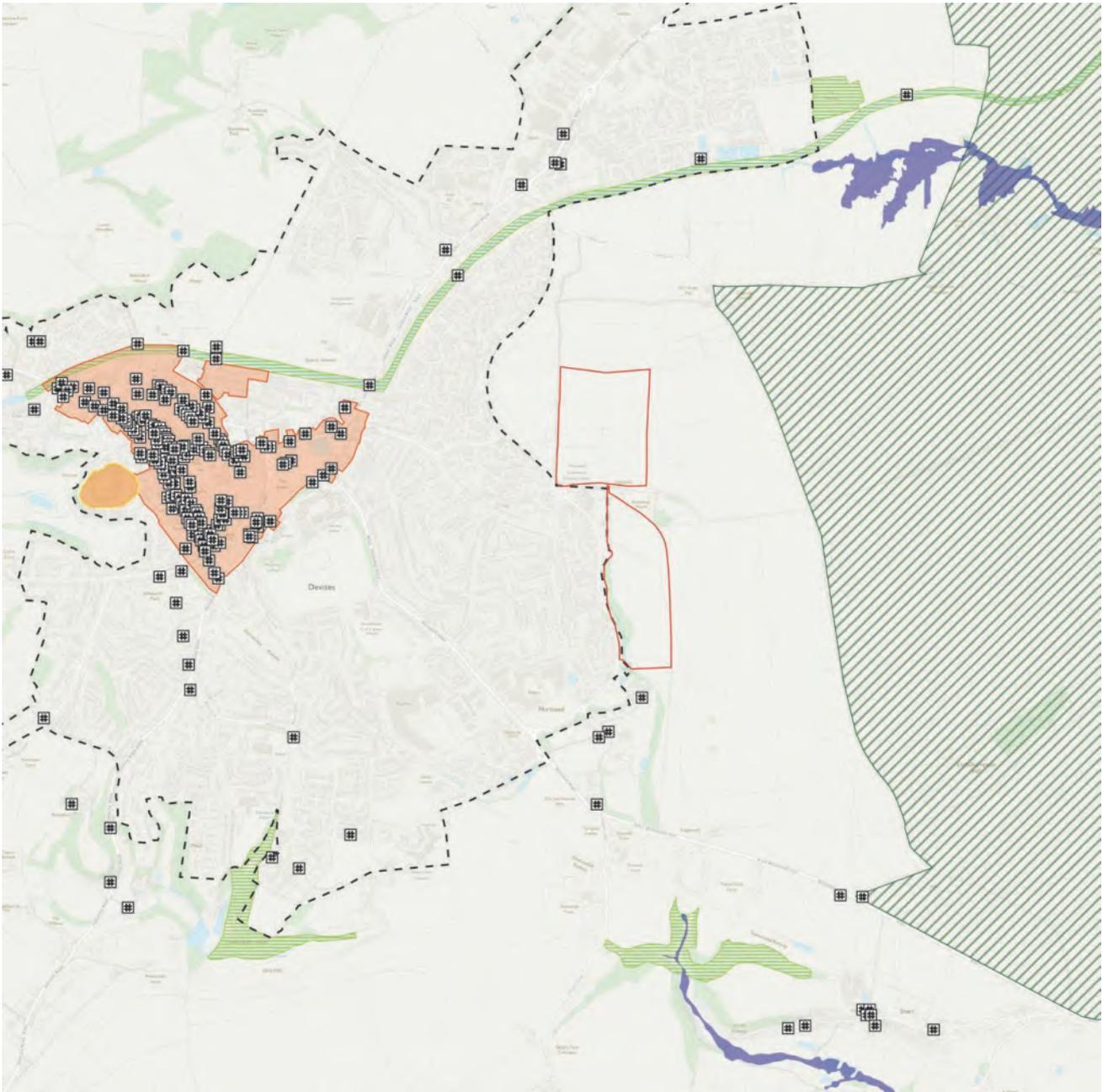
- 1.1 This document has been prepared on behalf of Hills Homes Developments Ltd to support the promotion of Land East of Windsor Drive, Devizes as an allocation for residential development in the Wiltshire Housing Site Allocation Plan.
- 1.2 The proposal for this site is considered to strike a balance between the requirement for additional housing in Devices whilst achieving a sensitive form of development.



Figure 1. View from Footpath (DEV15) looking south east over Nursteed Primary School

PLANNING POLICY CONTEXT

- 1.3 The Wiltshire Core Strategy was adopted in January 2015. Core Policy 12 requires approximately 2,500 new homes to be provided in the Devizes Community Area, of which about 2,010 homes should be at Devizes. This reflects the spatial strategy set out in Core Policy 1 and the role and function of Devizes as the only designated Market Town in the Community Area. Growth is to be concentrated at Devizes to support a sustainable pattern of development and in recognition of the capacity of the Town to accommodate further strategic development.
- 1.4 The Devizes Community Area Topic Paper (June 2017) asserts that there is not an “indicative residual requirement” for Devizes because the “indicative requirement” (2010) is met by completions and commitments. The emerging Housing Site Allocations Plan therefore proposes that no housing sites will be identified for allocation at Devizes. However, a sizable proportion of the Commitments 2017 – 2026 are the site-specific allocations at Policy H3 of the adopted Devizes Neighbourhood Plan (2015). Monitoring confirms that many of these sites are not deliverable (Footnote 11 of the NPPF) and should not therefore be relied on to meet Core Strategy requirements. The likely shortfall is anticipated to be about 250 dwellings.
- 1.5 It is clear that, the HSAP should not rely on the adopted Neighbourhood Plan to deliver the key Core Policy objective of concentrating strategic growth at Devizes, particularly as the “indicative residual requirement” must be regarded as an absolute minimum (as the draft HSAP itself acknowledges at Paragraph 4.2).
- 1.6 If the Core Strategy’s spatial strategy for the Community Area is to be delivered and the NPPF’s objective to boost significantly the supply of housing (Paragraph 47) is to be met, the HSAP must allocate a site at Devizes to ensure that at the very least the minimum indicative requirement for the Town is delivered, and preferably that it is exceeded.
- 1.7 This Site Promotion Document demonstrates that land at Windsor Drive (in part, SHLAA reference 624) offers a suitable location for development now with a realistic prospect that housing will be delivered in the short term. The SHLAA concludes that the northern part of the site now promoted is suitable for development, subject to potential constraints (the southern part was not previously assessed). Much of the site lies within the 20-minute walking distance from the Town Centre, which the Neighbourhood Plan identifies as being a key consideration in determining the most suitable locations for new housing. None of the site is designated as being of special environmental, visual or historic significance.



- KEY**
-  Site Boundary
 -  Conservation Area
 -  North Wessex Downs AONB
 -  Scheduled Ancient Monument
 -  Settlement Boundary (WCS Policy CP1)
 -  Listed Building
 -  Flood Zone 3
 -  County Wildlife Site

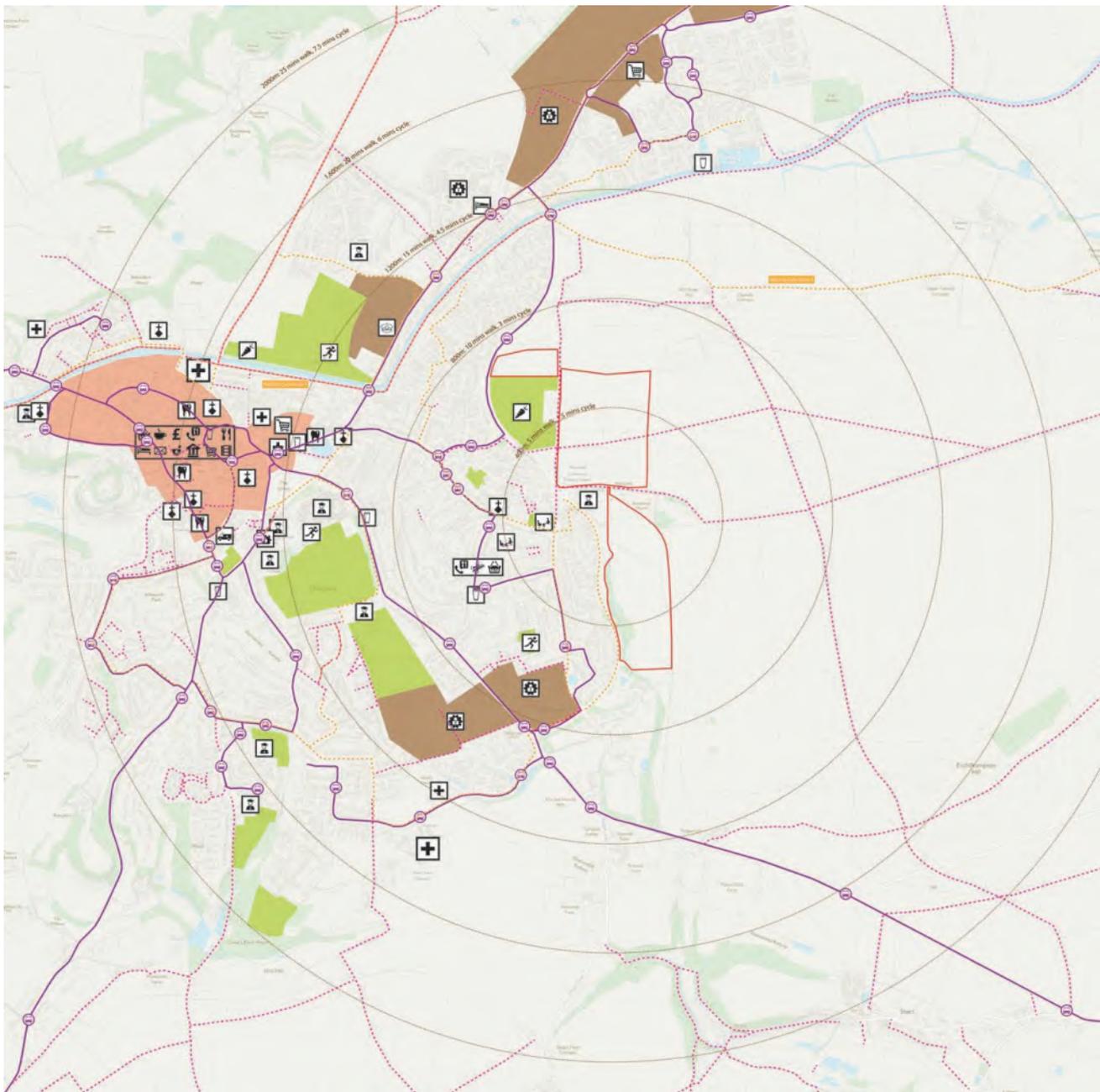
Figure 2. Contextual Analysis - Designations Plan

CONTEXTUAL ANALYSIS

A Sustainable Location

- 1.8 The site lies on the east of Devizes. Devizes is a historic market town and offers a number of facilities and services within its popular and attractive town centre. The whole of the town centre is designated as a Conservation Area in recognition of the quality of architecture and importance of historic development and activity.

- 1.9 The town provides a comprehensive range of services and facilities, which also serve the surrounding outlying villages. The town presently has a range of education provision, several supermarkets, health facilities and a variety of independent shops and cafes befitting its long standing role as a “second tier” settlement in Wiltshire. As shown in the adjacent diagram the site is well related to the town centre; indeed it is in closer proximity than some existing parts of the town.



KEY

- | | | | | | | | |
|--|-------------------------------------|--|-------------------|--|-------------|--|---------------------|
| | Site Boundary | | Open Space | | Supermarket | | Restaurant |
| | Public Right of Way | | School | | Shop | | Public House |
| | Bus Route and Stops | | Healthcare | | Post Office | | Takeaway |
| | Cycle Route | | Pharmacy | | Bank | | Police Headquarters |
| | 5 min Walking Distance | | Dentist | | Museum | | Play Area |
| | Protected Strategic Employment Site | | Industrial Estate | | Hotel | | Allotments |
| | Town Centre | | Place of Worship | | Hairdresser | | Sports Ground |

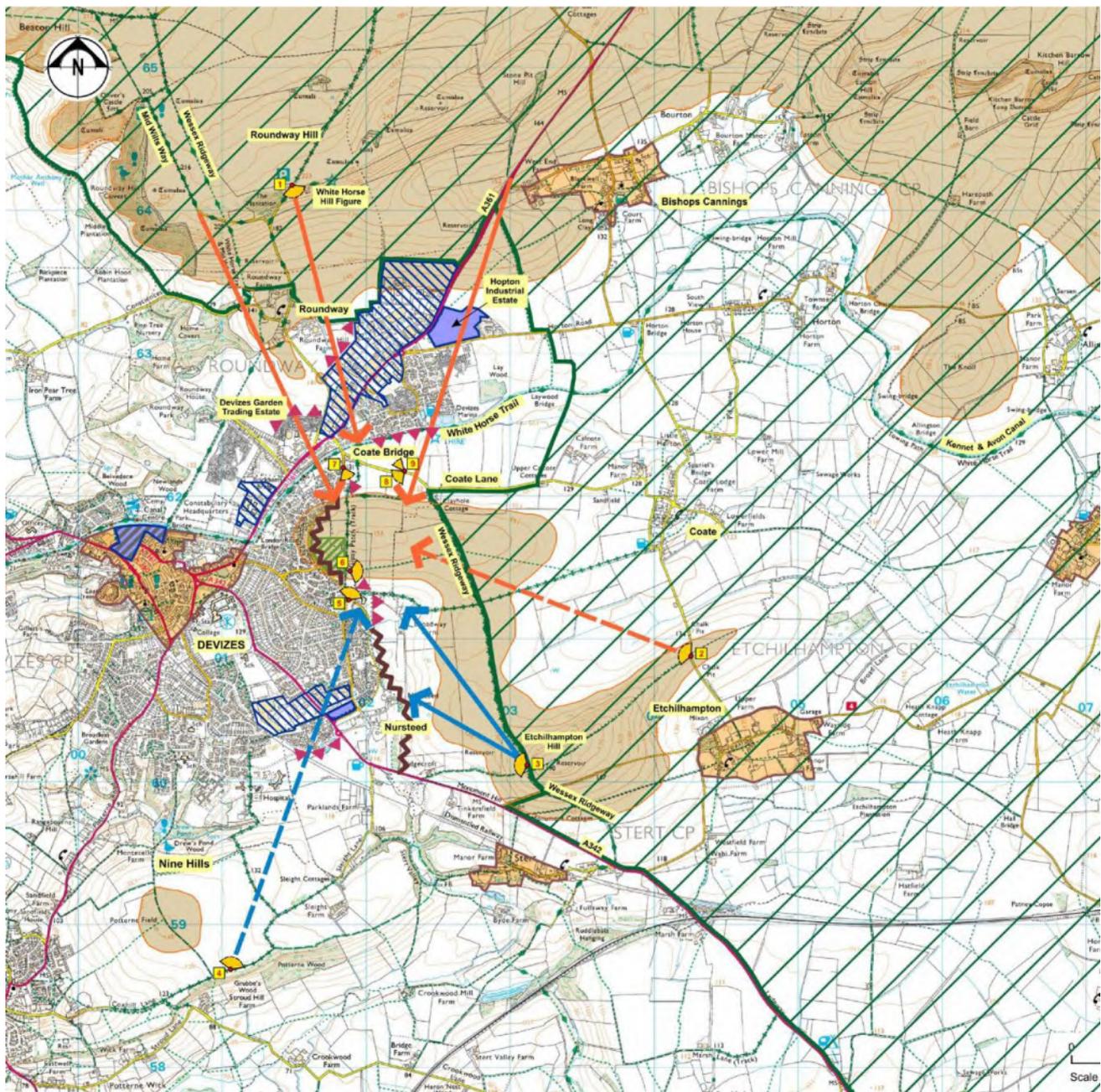
Figure 3. Contextual Analysis - Accessibility Plan

Landscape

- 1.10 The eastern side of Devizes lies near to, but not within or adjoining, the North Wessex Downs AONB. The Wessex Ridgeway long distance footpath follows the edge of the AONB.
- 1.11 The area between the urban edge and the AONB was previously allocated in the Adopted Kennet Local Plan under the 'Setting of Devizes' policy. However this policy was applied to virtually all land surrounding the town and has not been 'saved'.
- 1.12 The Site lies on the eastern fringe of the Town, outside of the Settlement Framework boundary, as shown on the Core Strategy Policy Map. It is therefore subject to general landscape policies, but it is not constrained by any other environmental policies.
- 1.13 Landscape is covered by Core Policy 51 of the Core Strategy, this sets out a landscape character based approach to the protection, conservation and enhancement of the landscape, and requires that, amongst other things, the following are given particular consideration:
- ▣ Local distinctiveness of natural features
 - ▣ Landscape setting of settlements
 - ▣ Transition at the urban fringe
 - ▣ Visually sensitive skylines and topographical features.
- 1.14 Emerging landscape policy requires particular consideration to be given to visually sensitive skylines and topographical features and development beyond these areas is likely to conflict with this policy. The central ridge and its associated upper exposed slopes are therefore, in policy and landscape terms, an unsuitable location for development.
- 1.15 The Landscape Assessment concluded that there appears to be scope for accommodating some areas of residential development on the eastern side of the town as part of a long-term visionary approach for the eastern fringe of the town, based around a comprehensive masterplan incorporating a defined network



Figure 4. LVIA Photograph 5 - From Windsor Drive looking north and east



KEY

- | | | | | | |
|---|--|---|---------------------------|---|--|
|  | North Wessex Downs Area of Outstanding Natural Beauty (AONB) |  | Employment Allocation |  | View towards northern part of Eastern Fringe |
|  | Land over 140m AOD |  | Principle Employment Area |  | View to ridge top only; rest of eastern fringe/town beyond not visible |
|  | Allotments |  | Contained Urban Edge |  | View towards southern part of eastern fringe; rest of fringe not visible |
|  | Conservation Area |  | Open Urban Edge |  | View towards central ridge; other parts of eastern fringe not visible |
|  | Residential Allocation |  | Photograph Viewpoint | | |

Figure 5. LVIA - Landscape Context and Analysis Plan

Local Character

- 1.16 The development of Devizes has taken place over a very long period. A timber castle was constructed on the site of the present castle in the 11th century and Devizes has evolved from that time. By 1899 the town centre had largely taken its present form and the Kennet & Avon Canal was constructed flowing broadly east to west. At this time, the Devizes Branch rail line was also in operation, approaching the town from the south east. Located to the north east of the town north of the canal was an army barracks and beyond this to the north and west was the woodland structure of Roundway Park estate.
- 1.17 From this period until 1922 there was generally limited change or growth in the town. However, by the 1970s substantial development had occurred with residential streets being laid out to the south and extending west of the castle and the town centre area and Roundway Hospital were completely linked by a continuous ribbon of development. To the east of the town residential streets extend in the direction of Nursteed to Brickley Lane. To the north east the army barracks had expanded significantly, growing up the rising ground to the north.
- 1.18 To the west of the site, Brickley Lane forms a dividing line between post-war housing to the west and more recent development to the east.
- 1.19 The area east of Brickley Lane has developed since the 1980s when Windsor Drive was built as a Distributor Road around the east of Devizes with housing extending up to it. The northern part of Windsor Drive (Jump Farm and Sandcliffe Farm developments) were built in the 1980s and reflect the style of that period with a loose layout of cul-de-sacs comprised predominantly of detached and semi-detached two storey dwellings.
- 1.20 The residential development along the southern section of Windsor Drive was constructed post 2000 and has a more permeable layout, with smaller street blocks. These developments utilise rear parking courtyards, with tight street patterns. Heights are generally two-storey across both areas, although the more recent development rises to three-storeys in a number of locations.



Figure 6. Photographs of the local character

SITE ASSESSMENT

1.21 The site is located on the eastern edge of Devizes and is divided into three distinct parcels:

1. East of Windsor Drive,
2. North of Brickley Lane, and
3. Broadway Farm.

1. East of Windsor Drive

1.22 This parcel consists of a single field to the north of the allotments. The site is surrounded on three sides by well vegetated boundaries of trees and hedgerows. The western boundary to Windsor Drive is relatively open, with only some low hedgerows. The Gypsy Patch' byway (DEV165) forms the eastern boundary of this parcel.

1.23 The site is visually connected to the existing residential development on the opposite side of Windsor Drive.

2. North of Brickley Lane

1.24 This parcel is comprised of a series of fields on the steeply sloping land which is currently physically and visually separated from the built edge of the town by the well vegetated 'Gypsy Patch' byway (DEV165) and an area of recently laid-out allotments and agricultural land.

1.25 The lower northern side of these fields area also well vegetated, whilst the eastern sides of the fields are formed by a gappy hedge with intermittent trees with a medium hedgerow with gaps on the lower southern side along Brickley Lane opposite the school (photograph 5). A public footpath (DEV15) crosses the site west to east from Windsor Drive towards Coate and connects to the wider local network of public rights of way.

1.26 The Landscape Appraisal identified that some development may be possible on the lower southern part of this area, opposite the school, with associated planting of tree belts to provide long term screening.

1.27 However, the steepness of the slope is likely to limit the amount of development that is possible here and considerable care would need to be taken to respect the ridge and views towards it. Long-term structural planting could assist with defining a potential area of development in this location which, once established, would reinforce the landscape structure and increase its potential capacity to accommodate some change. The upper southern slopes and the northern slopes of the ridge are more prominent and, for the reasons stated above, should be avoided, although these areas may offer opportunities to accommodate open spaces in conjunction with development in the adjoining less sensitive areas.

3. Broadway Farm

1.28 The southern parcel, Broadway Farm, is well defined by a belt of mature trees and reinforced by additional recent tree planting on its western edge whilst the eastern edge is largely open farmland. This parcel, being set down below steep downland slopes, is well contained in views from the north, east and south east (photograph 3). Local views are prevented by the band of woodland that runs along the western edge of the area. The landscape assessment concluded that there is some potential for accommodating development in this area although structural planting would be needed on the eastern side to strengthen and define this edge.



- KEY**
- Site Boundary
 - North Wessex Downs AONB
 - Existing Urban Area
 - Public Right of Way Byway
 - Public Right of Way Footpath
 - Cycle Route
 - Contours (5m)
 - Listed Building
 - Mast
 - School
 - Industrial Estate
 - Allotments
 - Play Area
 - Trees
 - Vegetation

Figure 7. Site Analysis Plan

THE CONCEPT

- 1.29 The site is sustainably located, with good links to the existing movement network including roads, public rights of way and pedestrian routes.
- 1.30 There is an opportunity to connect to this network.

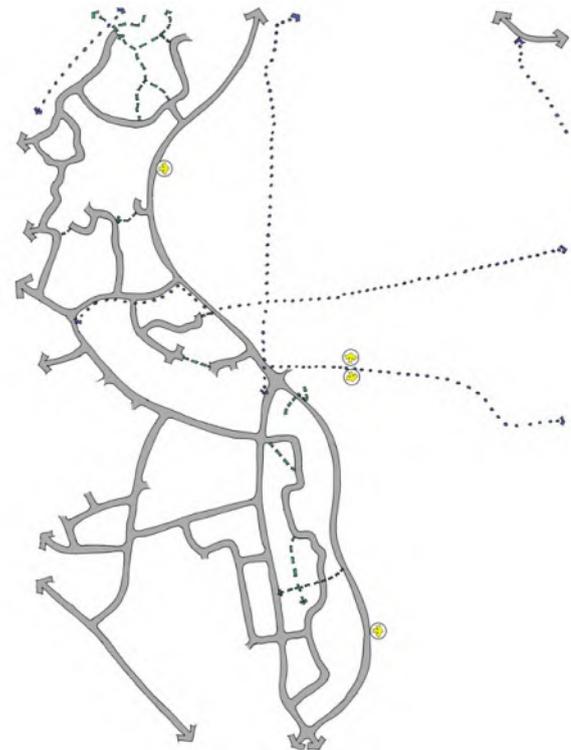


Figure 8. The Existing Movement Network

- 1.31 New pedestrian and cycle routes will be provided throughout the site, opening the site up for recreation and amenity.
- 1.32 These routes will provide alternative safe, off-road routes to Nursteed Primary School through a pleasant environment to encourage walking and cycling.
- 1.33 The proposed pedestrian and cycle routes will connect to the wider footpath network and increase permeability within the wider area.

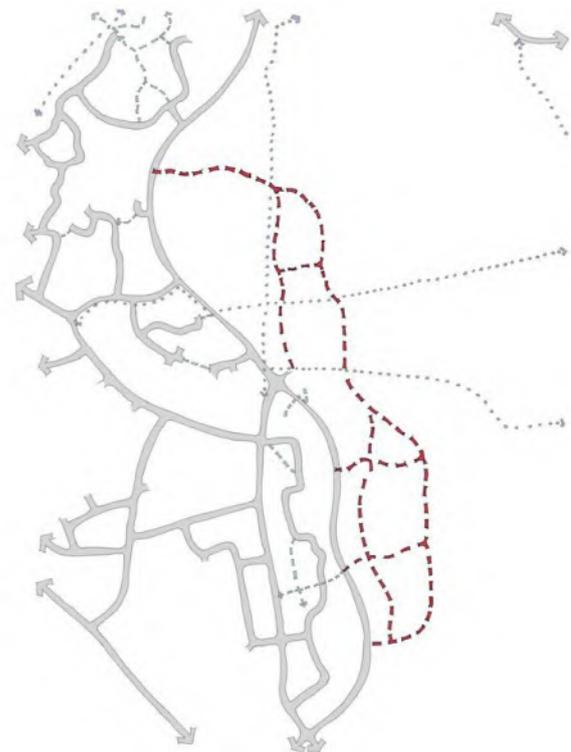


Figure 9. New Pedestrian and Cycle Network

- 1.34 The vision is to retain and strengthen the existing landscape structure by retaining existing trees and hedgerows.
- 1.35 The proposals will utilise the topography of the area and retain the skyline and views to the central ridge.



Figure 10. The Existing Landscape Structure

- 1.36 New structural landscaping is proposed along the eastern edge of the site to strengthen the existing tree and hedgerow belts and create new ecological links.



Figure 11. A Strong Landscape Framework

- 1.37 A pair of central green links are proposed running west to east. These links are designed to promote permeability through the residential area, linking Devizes through to the wider countryside.
- 1.38 Properties will front onto these green fingers creating a distinctive setting and bringing green to the doorstep.



Figure 13. Green Fingers

- 1.39 The proposals are to create a new soft landscape edge to Devizes, through a framework of interlinked open spaces.
- 1.40 This central green spine of accessible open space runs through the development parcels and links to the existing allotments to the west of the site.



Figure 12. Accessible Open Space

1.41 Organic neighbourhoods will be formed within this landscape structure to provide much needed homes within the lower lying areas of the site.

1.42 A small neighbourhood centre at the centre of the scheme will provide a much needed parking and drop-off facility for the neighbouring Nursted Primary School and will add to creating a “sense of place”



Figure 14. Neighbourhoods

DEVELOPMENT FRAMEWORK OPTION 1

- 1.43 Option 1 provides for the comprehensive development of the site. The proposals include the following land uses:
- ▣ A net developable area of 9.63 ha, as set out in the development framework plan shown to the right. This will include land for up to 300 new high quality homes, associated vehicular infrastructure and private gardens.
 - ▣ A new Neighbourhood Centre, including the potential for a small retail/community element with residential above, alongside a drop-off/ parking area for the school.
 - ▣ The proposals include 17.93 ha of green infrastructure including accessible open space, SuDS and structural planting.
- 1.44 The proposals are felt to balance the need for housing in a sustainable location, with the provision of a significant amount of accessible open space for the community.
- 1.45 Vehicular access to the residential parcel East of Windsor Drive will utilise the existing field access gate.
- 1.46 Vehicular access to the parcels North of Brickley Lane would be provided from a new access junction from Brickley Lane which would also serve as the northern access to the Broadway Farm parcel. A second access serving Broadway Farm would be created from Windsor Drive.
- 1.47 Pedestrian and cycle access will be provided throughout the scheme, linking into existing public rights of way and pedestrian and cycle routes.



KEY

- Site Boundary
- Existing Open Space
- - - Public Right of Way
- Existing Tree or Hedgerow
- Proposed Residential Development
- Proposed Neighbourhood Centre
- Proposed Open Space
- Proposed Area with Potential for SuDS
- Proposed Structural Planting
- ➔ Proposed Access
- Proposed Primary Road
- Proposed Secondary Street
- Proposed Tertiary Lane / Private Drive
- - - Proposed Footpath / Cycle Route
- ┌ Landmark Building

Figure 15. Development Framework Plan – Option 1

DEVELOPMENT FRAMEWORK OPTION 2

Land Use

1.48 Option 2 provides for reduced residential development in the Broadway Farm parcel, accessed only from Brickley Lane. The proposals include the following land uses:

- ▣ A net developable area of 7.84 ha, as set out in the development framework plan shown to the right. This will include land for up to 250 new high quality homes, associated vehicular infrastructure and private gardens.
- ▣ A new Neighbourhood Centre, including the potential for a small retail/community element with residential above, alongside a drop-off/ parking area for the school.
- ▣ The proposals include 19.72 ha of green infrastructure including accessible open space, SuDS and structural planting.

1.49 The proposals are felt to balance the need for housing in a sustainable location, with the provision of a significant amount of accessible open space for the community.

Access

1.50 Vehicular access to the residential parcel East of Windsor Drive will utilise the existing field access gate.

1.51 Vehicular access to the parcels North of Brickley Lane and Broadway Farm would be provided from a new access junction from Brickley Lane.

1.52 Pedestrian and cycle access will be provided throughout the scheme, linking into existing public rights of way and pedestrian and cycle routes.



KEY

- Site Boundary
- Existing Open Space
- - - Public Right of Way
- Existing Tree or Hedgerow
- Proposed Residential Development
- Proposed Neighbourhood Centre
- Proposed Open Space
- Proposed Area with Potential for SuDS
- Proposed Structural Planting
- ➔ Proposed Access
- Proposed Primary Road
- Proposed Secondary Street
- Proposed Tertiary Lane / Private Drive
- - - Proposed Footpath / Cycle Route
- Landmark Building

Figure 16. Development Framework Plan – Option 2

Scale and Massing

- 1.53 The scale and massing of the proposals will be in keeping with the local area.
- 1.54 Built form will be kept to the lower lying areas of the site to retain visually sensitive skylines and the topographical feature of the central ridge.
- 1.55 Building heights will reflect the edge of settlement location and will be restricted to a maximum of two storeys across the site.

Character and Appearance

- 1.56 The character of the scheme will reflect the best of Devizes historic vernacular and distinctiveness
- 1.57 Devizes has a rich variety of architectural styles and forms which are tied together through common materials and details (these are set out in more detail in the next section). The intricacy of typical street conditions which these diverse forms create is more challenging to replicate immediately in newer developments, but by using varied roof lines and house typology alongside a considered urban layout, an interesting and varied street scene can be created.
- 1.58 The development will avoid pastiche and embrace modern interpretations of the local character and respecting the feel of Devizes using established materials, textures and colours. The detailed design will demonstrate that Local Character is a strong design theme throughout.

Landscape

- 1.59 The proposals provide a significant amount of multifunctional, accessible open space providing opportunities for recreation, play and amenity.
- 1.60 A carefully designed Landscaping Scheme and Management Plan, based on sound Arboricultural, Landscape and Ecological Impact Assessments, will ensure that the site is developed and maintained sensitively to protect and enhance the natural environment.
- 1.61 There is an opportunity to provide Sustainable Drainage Systems within the site, including on-site attenuation within the open space.



KEY BENEFITS

- 1.62 This site promotion document shows how the land east of Windsor Drive could be brought forward as a logical urban extension to Devizes to create a sustainable 21st century community.
- 1.63 The site is well related to the existing pattern of development, with good access to local facilities and public transport routes.
- 1.64 Development of the site provides the opportunity to enhance the eastern edge of the town, providing a substantial Green Infrastructure link and landscape buffer to define the edge of settlement, between the open landscape of the AONB and the town edge.

An attractive form of development that compliments the character and appearance of the surrounding area and is integrated into the landscape.

Provision of much needed new homes that would help to meet an identified housing need on a site immediately adjacent to an established community; including family housing and affordable housing.

Provide a **substantial Green Infrastructure** link and landscape buffer to define the edge of settlement, between the open landscape of the AONB and the town edge.

Provision of a **drop-off area/car park** for **Nursteed Primary School** to relieve the existing parking problem

Create a strong **“sense of place”** for people to live, work and play.

A positive knock-on effect to the local economy and community through increased population to support local shops, services and facilities, increased local revenue.

Sustainably located development conveniently located to nearby shops, schools, services and facilities.

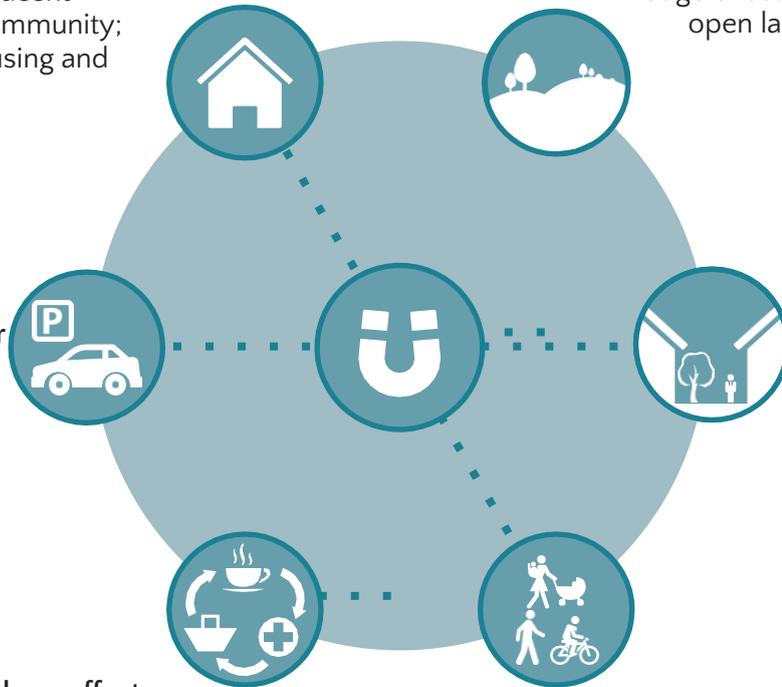


Figure 16. Key Benefits

SITE PROMOTION DOCUMENT
SEPTEMBER 2017

WINDSOR DRIVE, DEVIZES
PROJECT NO. 1355

PRO VISION
Grosvenor Court, Ampfield Hill, Ampfield
Romsey, Hants SO519BD
Tel: 01794 368 698

www.pro-vision.co.uk



STRAT177

The Emerging Spatial Strategy Consultation Response Form

Ref:	(For official use only)
-------------	--------------------------------

The overarching 'Emerging Spatial Strategy' paper identifies the proposed overall level of new homes and employment land for each main settlement and rural part of the HMA, over the plan period, together with what remains to be planned for once existing housing completions and commitments have been accounted for.

To view the Emerging Spatial Strategies paper please visit the Council's Local Plan Review Consultation page on it's website at: <https://www.wiltshire.gov.uk/planning-policy-local-plan-review-consultation>

Please return to Wiltshire Council by Tuesday 9th March 2021.

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

This form has two sections:

Section One – Personal details

Section Two – Your comments on the Emerging Spatial Strategy. Please use a separate sheet for each representation.

Section One – Personal details

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

	1. Personal details	2. Agent's details (if applicable)*
Title		
First name		
Last name		
Job title (where relevant)	Planning Officer	
Organisation (where relevant)	Chippenham Town Council	
Address Line 1		
Address Line 2		
Address Line 3		
Address Line 4		

Postcode		
Telephone Number		
Email Address		

Section Two – Please enter any comments you have regarding the Emerging Spatial Strategy in the box below.

Comment:

Housing Figures

It is not clear whether the housing figures set out in Paragraph 1.1 of this document are up to date and have been amended to reflect the changes to the Government’s Standard Method in December 2020, or the impact of the COVID-19 pandemic and economic recession on population and migration figures.

We do not agree that there should be two housing figures (a lower and higher figure) as this confuses things. The Government has provided a Standard Method to calculate a housing figure for an area and this should be the only figure that is used.

The higher housing figure is questionable particularly since the 2019 Local Housing Needs Assessment, from which this figure is derived, is based on even earlier projections of economic growth taken from the 2017 Economic Development Needs Assessment. Given the subsequent economic recession due to the COVID-19 pandemic, together with the fact that Wiltshire Council have not justified using a higher figure in aid of Paragraph 73 of the NPPF, there appears to be **no justification for setting a higher figure of 45,630 houses, and the Standard Method figure (as adjusted) should be used.** We object to the use of the higher figure when the Standard Method will be challenging enough to meet given the downward economic trend.

The housing target allocated to Chippenham is much too high (at 9,225 and equivalent to 20% of the total number for Wiltshire), bears no relation to Chippenham’s actual housing needs and is predicated on substantial numbers of people relocating here, in order to commute back out, causing more congestion and significant damage to the climate. There is concern about the impact of such large scale development on traffic, existing green spaces and cycleways.

Wiltshire Council has not provided sufficient evidence to justify the housing numbers for Chippenham. The ONS growth rate, cited in the Housing Needs Assessment for the Chippenham Neighbourhood Plan, equates to a need for approximately 2500 new dwellings for Chippenham. Over 2,000 houses approved in the previous Local Plan have yet to be built or receive planning permission, casting further doubt on the need for such large-scale development.

The Chippenham housing numbers, and their location, should not be dictated by a grant application for a distributor road, which did not undergo any public consultation, and which serves to predetermine the Spatial Strategy. The decision to run the Local Plan Review consultation and the Future Chippenham consultation side by side has created confusion amongst the general public.

Wiltshire Council needs to develop an alternative Spatial Strategy, which is employment led, “appropriate in scale” and “environmentally sustainable” (as stated in the Vision for the Chippenham Neighbourhood Plan).

Brownfield Target

We consider there should be an ambitious approach to prioritising use of brownfield sites through the provision of a brownfield target that is included within the overall housing target; so as to maximise the use of increasingly available brownfield office and industrial locations as a result of the COVID-19 pandemic, and the recent 'change in use' provisions. Brownfield sites are able to deliver substantial numbers of homes on small footprints (e.g. 333 low carbon homes proposed at Langley Park) and have the advantages of being affordable, close to the town centre, reducing the need for cars, and helping keep the town centre alive. We should be open to further opportunities for changing building use in response to reducing need for retail.

Paragraph 65 of the NPPF states that: *"within the overall requirement, strategic policies should also set out a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development and any relevant allocations"*. Paragraph 66 continues *"where it is not possible to provide a requirement figure for a neighbourhood area, the local planning authority should provide an indicative figure, if requested to do so by the neighbourhood planning body"*.

In the Local Plan Review an indicative housing figure is provided for the urban area but not the Parish (neighbourhood area). Our Neighbourhood Plan has requested that Wiltshire Council provide a figure for the neighbourhood area, but this has not been forthcoming. **We do not agree with the approach proposed that an indicative housing figure be provided for an urban area, and request that separate figures should be supplied to Chippenham for neighbourhood planning purposes in line with government guidance:** namely Chippenham's housing requirement; Chippenham's windfall expectation (which is included within the Chippenham housing requirement); and strategic additional housing requirement.

The Local Plan Review proposes that the Local Plan allocates no land for brownfield development in Chippenham in the period up to 2036. The brownfield target figure is derived from past windfall figures and is in addition to the housing requirement figure for the area. It is then taken off the housing requirement for future Local Plan reviews.

The above methodology appears muddled, with the brownfield target considered to be external to the housing requirement figure, yet windfall considered to be internal to the housing requirement figure. It is more than likely that some windfall development will occur on brownfield land. This is not splitting straws – allocations, indicative housing requirements, brownfield targets, windfall targets are all different concepts in planning and are not interchangeable.

This causes difficulties for our Neighbourhood Plan in a number of ways. The 'brownfield target' is based on past windfall figures (brownfield and windfall are not synonymous). Our Neighbourhood Plan does not allocate housing on brownfield sites but anticipates that brownfield development will occur on the Bath Road Car Park/Bridge Centre site (as part of mixed-use development) and in the town centre as residential conversions. Therefore, there will be new housing supplied in the town and this should be subtracted from the overall total. This might mean that the Strategic Allocations could be reduced in size. However, because the Local Plan Review is treating brownfield sites in addition to housing requirement met on Strategic Allocations, there is no scope to consider the town's overall needs.

In addition, Paragraph 3.11 of the Emerging Spatial Strategy refers to setting a brownfield target for the next 10 years of the Local Plan period, not for the whole of it.

Firstly, we do not agree that the brownfield target should be in addition to the overall housing requirement figure. Secondly, we consider any brownfield target should align with the Plan period.

We believe brownfield provision for Chippenham could be higher than the 240 houses proposed, given the potential for brownfield sites to come forward because of the COVID-19

pandemic and the change of use provisions. We recommend that Wiltshire Council further investigate allocating brownfield sites in their Plan, to reduce the amount of greenfield development proposed.

Future notification

I wish to be notified of any future updates relating to the Local Plan Review:

YES: NO:

Clicking yes will add you to the planning policy contact database. This will mean you are kept informed of any future planning policy updates and consultations.

Further information on how the Spatial Planning Department treats your personally identifiable information can be found by reading the privacy notice available via the link below:

<https://www.wiltshire.gov.uk/planning-privacy-notice>

Here you will also find information about how and why your data may be processed and your rights under the Data Subject Information Notice section further down the page.

Signature:

Date:

Thank you for completing this form.

Data Protection

Wiltshire Council has a duty to protect personal information and will process personal data in accordance with Data Protection legislation. The personal data you provide on this form will only be used for the purpose of the Wiltshire Development Framework. It may also be used for the prevention or detection of fraud or crime and in an anonymised form for statistical purposes. The data will be stored on computer and/or manual files. You have a right to a copy of your information held by any organisation, with some exemptions. To gain access to your personal data held by Wiltshire Council or if you have any Data Protection concerns please contact Wiltshire Council's Data Protection Officer on 01225 713000 (switchboard) or e-mail to dataprotection@wiltshire.gov.uk ."

STRAT178

THE WILTSHIRE LOCAL PLAN REVIEW CONSULTATION

Omission Site – Land north of Low Lane (Site 9)

Representations Prepared by Pro Vision on behalf of Hills UK Ltd

February 2021

OMISSION SITE – LAND NORTH OF LOW LANE (SITE 9)
THE WILTSHIRE LOCAL PLAN REVIEW CONSULTATION
PROJECT NO. 2423

PREPARED BY:



CHECKED BY:

DATE:

FEBRUARY 2021

PRO VISION
THE LODGE
HIGHCROFT ROAD
WINCHESTER
HAMPSHIRE
SO22 5GU

COPYRIGHT: The contents of this document must not be copied or reproduced in whole or in part without the prior written consent of Pro Vision.

CONTENTS

1.0 Introduction 1

2.0 Emerging Spatial Strategy 4

3.0 Planning for Calne – Direction of Growth 8

4.0 Planning for Calne – Selection of “Pool” Sites 9

5.0 Land at Low Lane 13

6.0 Conclusion..... 19

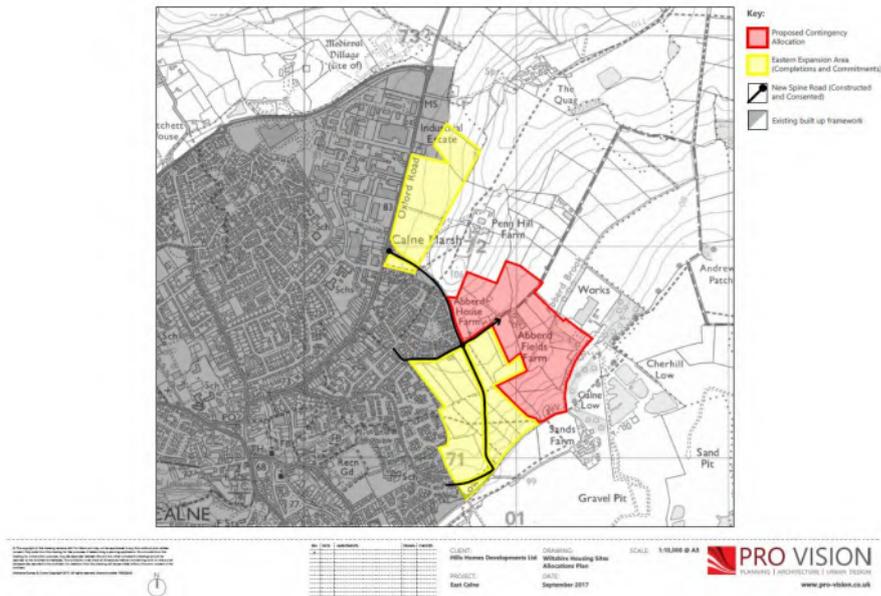
1.0 Introduction

1.1 This representation is made on behalf of Hills UK Limited in relation to land in their sole ownership north of Low Lane, Calne (The Site). It is in response to Wiltshire Council’s Regulation 18 Consultation on the emerging draft of the Wiltshire Local Plan Review (LPR) to 2036.

1.2 The location and extent of the Site is shown shaded yellow on the Plan below. It has an area of approximately 5 hectares.



1.3 The Site was first promoted for development in conjunction with adjoining land to the north, when duly made representations were submitted on the pre-submission draft of the Wiltshire Housing Site Allocation Plan in July 2017 (see Appendix A). In the event, that Plan deferred to the Neighbourhood Plan to make housing allocations at Calne and did not adopt the principle of making a contingency allocation as we had proposed. The extent of the proposed allocation put forward at that time is illustrated below.



1.4 In the context of the SHELAA and generally to contribute to the evidence base of the Local Plan Review, a more detailed representation was submitted in respect of the Site alone on the 16th of April 2020. This included a series of Urban Design Studies demonstrating its suitability for development in the manner proposed.

1.5 Nevertheless, the Site was not included in the Council’s SHELAA (2017) nor, apparently has it been considered in the emerging LPR. It is not therefore included in the “Pool” of potential sites identified in the LPR, notwithstanding it is sandwiched between land that has been included in the Pool to the north and south (Sites 3 and 4) and adjoins the Town’s recently extended built up area to the west. The exclusion of the Site from site selection exercise is irrational and its omission from the Planning for Calne Pool of sites a serious oversight in the plan making process.

1.6 In response to the Council’s consultation on the Local Plan Review this representation:

- examines whether the emerging preferred spatial strategy for the Chippenham MHA will be effective.
- In the context of “Planning for Calne” considers the potential directions for growth

- Reviews the Council's Site Selection Report for Calne.
- Explains why land north of Low Lane should be included in the Pool of sites. A Landscape and Visual Impact Assessment undertaken by WHL is submitted to support this representation.

2.0 Emerging Spatial Strategy

- 2.1 The preferred spatial strategy for the Chippenham HMA is to concentrate almost half of the planned growth at Chippenham.
- 2.2 The current strategy 2006-2026, set out in the Wiltshire Core Strategy, identifies a requirement at Chippenham for 4510 homes (225 dpa). The new strategy proposes a step change in housing delivery with a requirement of 9,225 homes for the plan period 2016-2036 (461 dpa); more than doubling the scale and rate of growth of the Town.
- 2.3 The adopted Chippenham Site Allocation DPD (CSA) (adopted May 2017) allocated two strategic sites (Rawlings Green and South West Chippenham) to accommodate approximately 1,650 dwellings, which were in addition to two existing commitments at North Chippenham and Hunter's Moon (now nearing completion). The emerging LPR therefore identifies a proposed residual requirement (ie overall housing requirement for plan period less existing commitments) of circa 5,100 dwellings.
- 2.4 The residual requirement is proposed to be delivered mainly from two major urban extensions to the north east and south of the Town, which together are expected to deliver about 5400 dwellings. No delivery trajectory is provided (although there is an acknowledgement that deliver of strategic sites at this scale is likely to extend beyond the Plan period).
- 2.5 Doubling the scale and rate of growth at Chippenham is neither justified nor is it an effective strategy for the HMA for the following reasons:
 - No delivery trajectory is provided. However, for the period 2020 to 2036 the Plan appears to propose the delivery of 7,325 dwellings (HAS allocations + LPR allocations). That is an implied sales rate of 458 dpa (8.8 units per week) which is entirely unrealistic.
 - The lead in time for major strategic sites is known to be substantial. For 2000+ dwelling sites it is typically 8.4 yrs (see Lichfield's Start to Finish (2nd Edition) - How Quickly to Large-Scale Housing Sites Deliver, February 2020). The LPR is not expected to be adopted Q2 2023 so first completions cannot be expected before 2032/ 2033. Even taking a optimistic delivery rate of last 5 years of the plan at 160 dpa (again the average rate for a 2.000 + dwellings). At best that would be 800 dwellings from each site in this plan period.

- It is telling that neither of the two HSA sites have commenced on site nearly 4 years following the adaption of the Plan.
- It is therefore entirely predictable that the proposed spatial strategy will fail to deliver even the minimum housing requirement for the plan period.
- The emerging spatial strategy also allows no meaningful scope for Neighbourhood Planning notwithstanding the consultation draft states that *“Both Chippenham and Melksham communities are actively engaged in neighbourhood planning and these too will play an important part in guiding growth”*.

2.6 The preferred spatial strategy proposes to “divert the scale of new housing away from the main settlements that are more environmentally constrained or sensitive (Calne, Corsham, Devizes and Malmesbury)”. But Calne is no more, and arguably significantly less, environmentally constrained/sensitive than Chippenham. As we show below, the Town demonstrably has substantial capacity to accommodate additional housing in conjunction with the new employment allocation (that the LPR proposes).

2.7 Not only would increasing the scale of growth at Calne enable a more achievable scale of growth to be planned for Chippenham, but it would also have the significant planning benefit of providing a means of dealing with town centre traffic congestion (and associated poor air quality); issues which the emerging LPR acknowledges but fails to address. Certainly, the scale of growth for Calne proposed by the LPR would be inadequate to meaningfully address these problems.

2.8 The emerging strategy proposes an overall housing requirement for Calne for the period 2016-2036 of 1610 dwellings (80.5 dwellings per annum). After taking into account completions and commitments, the residual required to be accommodated by the LPR is 360 dwellings. In addition, a requirement for 4 ha of employment land is identified.

2.9 627 dwellings were completed at Calne between 2016 – 2019 – that is an average of 209 dwellings per annum. Assuming that the existing commitments of 625 dwellings (as at April 2019) will be built-out at a similar rate, the emerging LPR’s strategy is, in effect, for the rate of house building in Calne to fall to 25 dwellings per year between 2022 and 2036 (notwithstanding that the headline figure for the whole plan period (2016 – 2036) is about 12% greater than for the previous 20 year plan period (2006-2026). That reduction in growth in the second half of the plan period is wholly unjustified and unnecessary, and

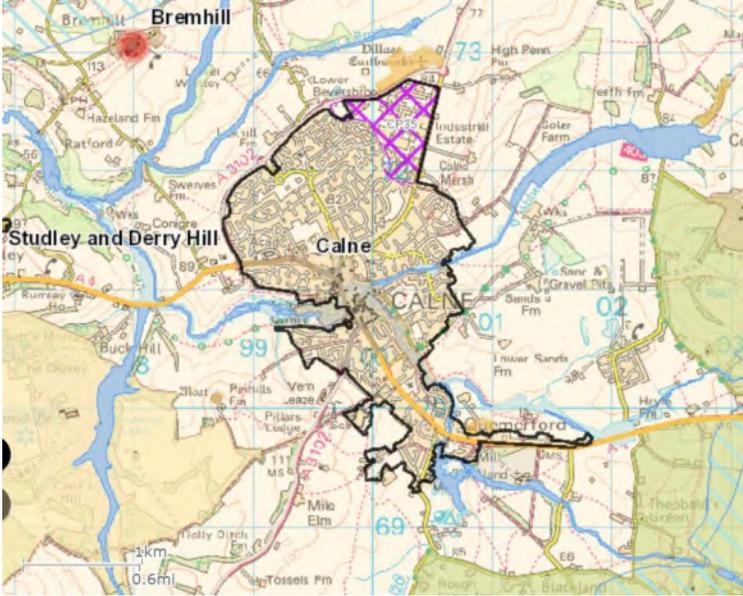
entirely inconsistent with the Government’s objective to “significantly boost the supply of homes”.

			Overall Housing Requirement (Dwellings)		Overall Employment Requirement (Hectares)
	Wiltshire Core Strategy 2006-2026	Brownfield target 2021-2031	Emerging Strategy 2016-2036	Residual at 1 April 2019	
Calne	1440	60	1610	360	4

2.10 The LPR’s evidence base identifies the environmental constraints that could potentially restrict or shape the further growth of Calne (see map below). In summary these are:

- None of the land adjoining the town is subject to any formal planning designation (save for its designation as countryside beyond the current Settlement Policy Boundary).
- The western edge of the North Wessex Downs AONB lies about 1.5 km to the east of Calne. Land on the southern and eastern edge of Quemerford would probably be regarded as being of landscape value because it forms part of the setting of the AONB, but the influence of the AONB does not extend further.
- To the west of the Town Bowood House and Park (important heritage assets) would significantly constrain major expansion in this direction.
- The outer impact zones of two designated Sites of Special Scientific Importance (Calstone and Cherill Downs to the south east and Bencroft Hill Meadow SSSI to north west).
- CS County Wildlife Site at Penn Wood and Crab Tree Copse
- Concentration of listed buildings in old town (a designated Conservation Area)
- Scheduled Ancient Monument Lower Beversbrook
- A narrow Flood Zone 2 and 3 along Abberd Brook (and Fishers Brook to the north)
- Grade 2 Agricultural Land to the west and south east

2.11 Whilst these environmental constraints will undoubtedly shape the form and direction of further growth, they do not amount to a level of environmental constraint that would justify a spatial strategy that severely restricts the overall scale of growth for the Calne.



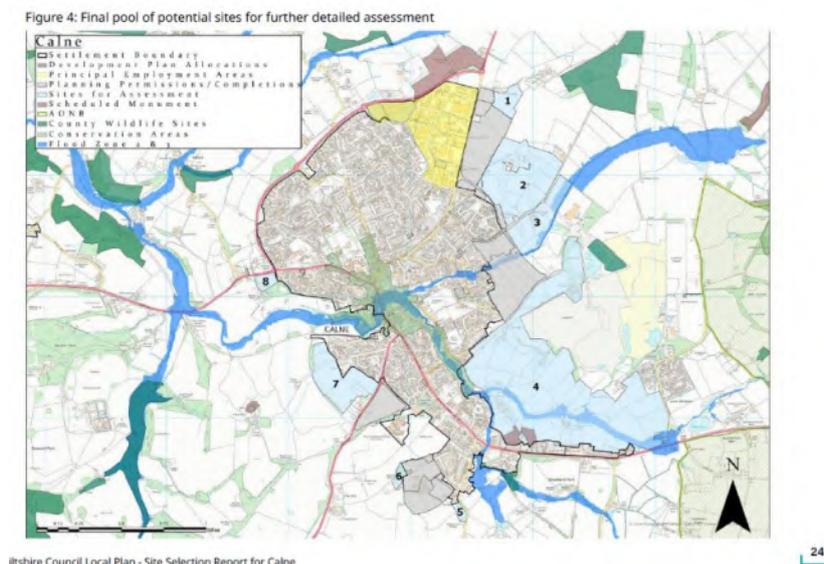
Extract from Wiltshire’s online policy map

3.0 Planning for Calne – Direction of Growth

- 3.1 We have shown above that at a strategic level Calne clearly has capacity for further growth without breaching high level environmental thresholds. Nevertheless, large-scale growth in certain directions is constrained.
- 3.2 The Town generally is contained below the 95 m contour to the west and east. To maintain the character of the town and to avoid visual intrusion on its landscape setting, further development should not take place above that contour.
- 3.3 To the west, the scale of growth is constrained by Bowood House and Park; the steep slopes rising above the existing edge of the built-up area; and the disused canal which forms a green lung leading into the centre of the Town and which forms an important part of the designated Conservation Area (and its setting).
- 3.4 Growth in a northerly direction would extend development into open countryside breaching a clearly established defensible boundary (the A3102); involve the loss of Grade 2 Agricultural Land; impact on a scheduled ancient monument; potentially impact on an area regarded as being a “Strategic Nature Area” (Wiltshire Local Plan Planning for Calne); and be relatively distant from the Town Centre.
- 3.5 To the south, development is constrained by the site of the medieval rural settlement at Quemerford (a scheduled ancient monument); the setting of the AONB; Grade 2 agricultural land; Flood Zones 2 and 3 and distance from and connectivity to the Town Centre.
- 3.6 It is therefore the Town’s eastern flank, the established direction of growth in recent years (including a Neighbourhood Plan allocation), which has the greatest environmentally unconstrained capacity, and which is well connected and accessible. Whilst, the pattern of further development would be shaped by the higher ground, this clearly remains the logical direction for further strategic growth.

4.0 Planning for Calne – Selection of “Pool” Sites

4.1 The Site Selection Report for Calne identified a “Pool” of eight potential sites (see Figure 4 - copy below).



4.2 We have critically reviewed the assessment of each site and added our comments on the Council’s assessment in red below:

Site 1: Land south of High Penn Track, Calne (SHELAA site 3616)

- Potential for heritage impacts as the site is close to the scheduled medieval settlement site at Beversbrook. **Agreed**
- New housing development is being built-out adjacent to the western boundary of the site.
- The site could form a suitable urban / rural edge if the north of the site is set out as planted green infrastructure linking in with the local nature reserve to the east. **But the consented site to the south (now being built out) already provides an extensive area of open space along its eastern and northern boundaries which provides an attractive and functional edge to the built-up area. Site 1 would represent development beyond this planned urban edge.**
- **The Impact on Penn Wood Local Wildlife Site does not appear to have been assessed.**

Site 2: Land to the west of Spitfire Rd (SHELAA sites 495, 3610)

- Potential for access onto Spitfire Road or Sand Pit Road. **Agreed**
- Likely low flood risk and heritage impacts. **Agreed**
- In landscape terms, site will need further assessment of impacts on the Area of Outstanding Natural Beauty (AONB) to the east. **Development on the prominent “finger” of high ground above the 95m contour would have an unacceptable landscape and visual impact. The north part of the site (approximately 50% of the total site area) is therefore unsuitable for development)**

Site 3: Land to the east of Spitfire Rd (SHELAA sites 488, 489, 451, 3168)

- Areas of flood risk associated with Abberd Brook along southern boundary.
- The site is closer to the AONB than some other sites and therefore may be more sensitive to development. **There is no evidence that this site forms part of setting of the AONB.**
- The site is in close proximity to Hills Quarry Products operations, therefore there will be potential noise and dust issues which will require further assessment. **The existing Hills Quarry Products operations on the adjoining site do not give rise to noise or dust issues that cannot be adequately mitigated by providing for an intervening landscaped buffer area (see below).**

Site 4: Land to the north of Quemerford (SHELAA sites 3642, 487, 1104a/b/c)

- A large split site which has the potential for landscape impacts, particularly towards the eastern part of the site. **Agreed. Development will have an impact on the AONB.**
- Potential for impacts on the existing mitigation and enhancement of the former extraction and landfill at Sands Farm and on Sands Farm. **Agreed**
- Quarry County Wildlife Site. **Impact can be mitigated and there is scope for enhancement.**
- Some areas of flood risk through the southern part of the site. **Agreed**
- Potential impacts on the scheduled monument (medieval rural settlement at Quemerford) and on the setting of Grade I listed Hayle Farm on the eastern edge. **These are very substantial constraints.**
- Site may need to provide an access onto the A4 to the south. **Development on this scale would require access to the north and south (effectively providing an eastern by-pass for the Town)**
- **Potential loss of Grade 1 and 2 Agricultural Land**

Site 5: Land at Stockley Lane (SHELAA site 700)

- Access onto Stockley Lane.
- The site is open to views out to the countryside to the west but relatively well screened to the east.
- Development of the site could be seen as encroachment into the countryside. The AONB is approximately 330m to the south and an assessment of impacts on the AONB **will** be needed.
- **The site is poorly related to the existing pattern of development.**
- **The site is too small to make a meaningful contribution to meeting local housing need.**

Site 6: Rookery Farm (SHELAA site 3254)

- Access could be achieved onto Cherhill Way.
- Site is adjacent to new housing at Marden Farm.
- Site is well screened by existing trees and hedgerows – these features would need to be retained on-site where possible.
- **The site is too small to make a meaningful contribution to meeting local housing need but could be allocated to help meet requirement for small sites.**

Site 7: Land off Wenhill Lane (SHELAA sites 709, 3211, 3251, 3312)

- Access would need to be provided onto the A3102. **Would require a secondary (emergency access)**
- Potential for impacts on the Bowood House and Gardens to the west and on the setting of Grade II* listed Vernleaze. **Avoiding harm to the setting of the listed building is a significant constraint.**
- Existing landscaping would need protection and enhancement to provide suitable screening on this urban / rural edge out to the west.
- **Development above the 95m contour would result in unacceptable visual and landscape impact. Development on the lower west facing slopes would be poorly related to the existing built-up area.**

Site 8: Land South of Chilvester Hill (SHELAA site 3172)

- Potential to access A4/A3102 via existing roundabout.

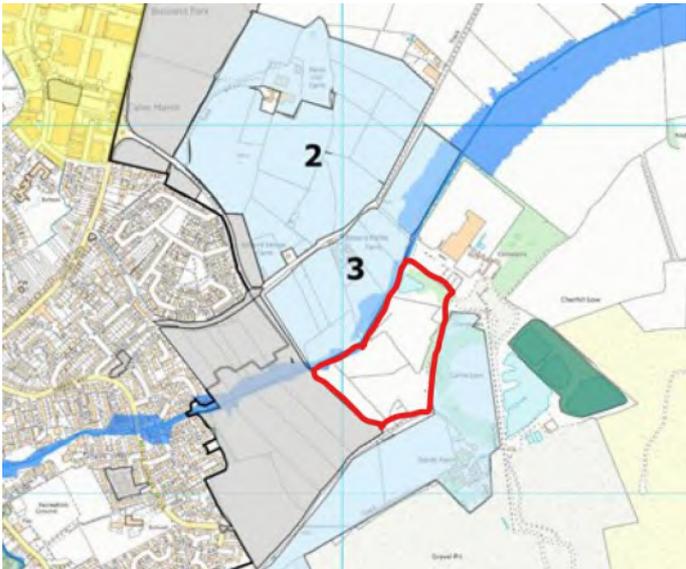
- Site relatively well screened to the south and west although there are long distance broken views to the east of Cherhill escarpment.
- Potential heritage impacts on Grade II listed Berhills Farm.

4.3 In conclusion, the Calne Site selection Pool should be limited to:

- Site 2 (part)
- Site 3
- Site 4 (part)
- Site 6
- Site 8 and
- Land at Low Lane (Site 9), for the reasons set out below.

5.0 Land at Low Lane

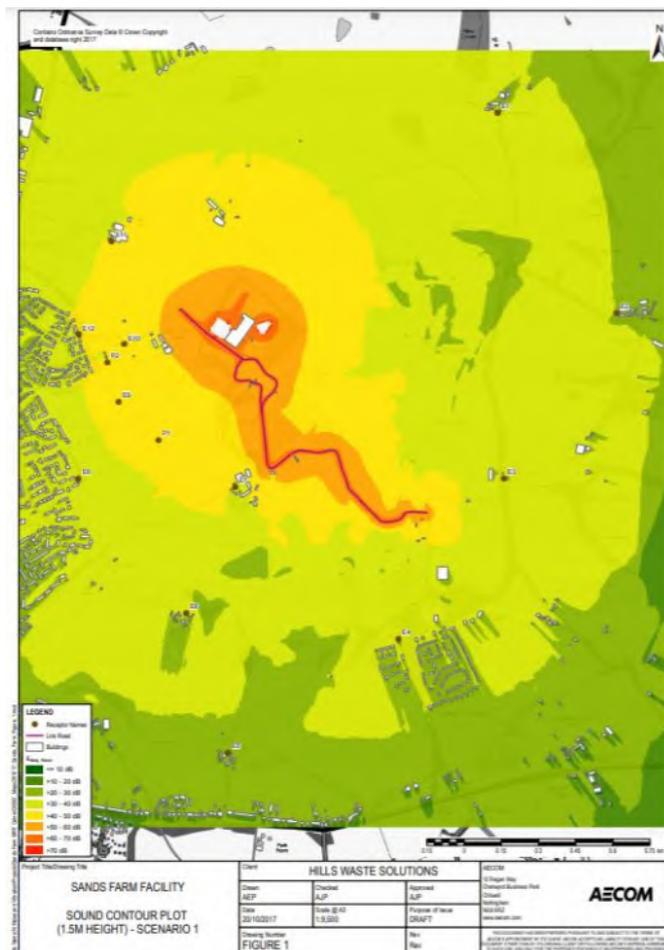
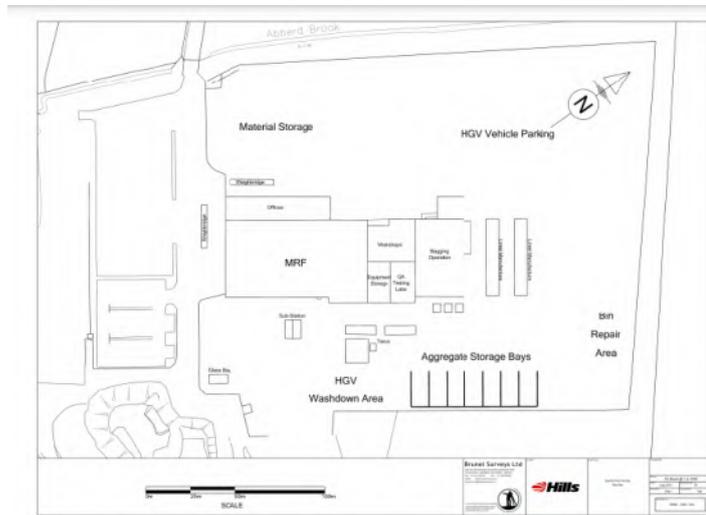
- 5.1 The Site is a very roughly rectangular shaped parcel of land lying immediately adjacent to the most recent parcel of new housing on the eastern edge of Calne (known as Phase 3 Land north of Low Lane). Its location and extent are shown edged red below.
- 5.2 It forms part of a mosaic of small pastures that are laid out on the low valley of the Abberd Brook, with land rising to above 95m OD to the north (at Penn Hill Farm) and to the south (at Sands Farm). Abberd Brook itself runs along the Site’s northern boundary. The Site rises to the south east, gently at first and then more steeply to Low Lane which follows the 95m contour.
- 5.3 To the north east the Site adjoins the former Concrete Products site which is accessed via Spitfire Road. This site is in the process of being re-purposed to accommodate a Materials Recovery Facility (MRF) (formerly located at Lower Compton), in accordance with the planning permission granted in August 2018 (17/10554/WCM). A condition of that planning permission was the construction of an HGV relief road (Linking Sandpit Road to Lower Compton) which substantially reduces HGV movements through the town Centre AQMA.
- 5.4 The Site Selection Report for Calne includes land to the north (Sites 2 and 3) and to the south (part of Site 4) within the “Pool” of potential development sites. The Site is therefore entirely enclosed by existing development to the north and south and by planned development to the east and west. It would be entirely irrational to exclude this land from any comprehensive plan for further growth in this direction.



Extract from The Site Selection Report for Calne

- 5.5 The Site has very few known constraints. It partly falls with the Calstone and Cherill Downs SSSI outer impact zone and the Calne Low Local Nature Reserve lies to the east. Development on the more steeply sloping parts of the site will need to be carefully planned to avoid ridge lines breaking the skyline. The narrow flood zone 2 and 3 along the Abberd Brook affects the north western edge of the Site.
- 5.6 The proximity of the Hill Quarry Products site is however a potential constraint that will require careful assessment and consideration as part of the master planning of the Site. In addition to the new MRF, there is one small active sand quarrying operation approximately 100m of the Site's north eastern corner.
- 5.7 The planning permission for the MRF identifies a range of associated uses including aggregate bagging plant, material test laboratory, vehicle depot and workshop, Lintel manufacturing and offices. The MRF and all these associated uses are carried out within the existing building. The only external uses are therefore vehicle wash down, parking, and limited external storage – as illustrated on the approved site layout drawing below. The approved scheme includes landscape and ecological mitigation and enhancement, noise and dust control and management (including new landscaped bunds), hours of operating restrictions and an Access Road Maintenance Plan.
- 5.8 As part of the submitted Environmental Statement in support of the MRF /HGV Relief Road proposals, noise and air quality impacts were assessed.
- 5.9 Operational sound levels to sensitive receptors were calculated for the operation of the site and internal link road. Under normal operation of the site, the impacts at sensitive receptors were assessed to be of very low adverse impact resulting in a negligible significance of effect at the majority of receptors. For the remaining receptors the impacts were of low adverse impact resulting in minor significance of effect. Of course, the promotion site (and the adjoining SHELAA sites 488, 489, 451, 3168) were not identified as being sensitive receptors, but the noise contour modelling (see for example below) demonstrates that predicted noise levels in the range of 40-50 dB (LAeq 1hour). Whilst further detailed assessment would be required at the master planning stage, there is no reason to believe that the Site cannot be developed to achieve a satisfactory noise environment (internally and externally).

5.10 Overall, the operational air quality effects of the proposed development, with the approved mitigation measures in place, were judged to be 'not significant'.



5.11 The site is capable of being well connected to the surrounding existing and planned residential neighbourhoods and to the town centre. The Abberd Brook has been identified as forming an important link in the “Green and Blue Infrastructure Corridors” that radiate from the Town. The development of the Site would provide the opportunity to enhance this infrastructure. Vehicular, pedestrian and cycle access can be provided to the west via the existing development area (the site layout allows for such a connection – see below)



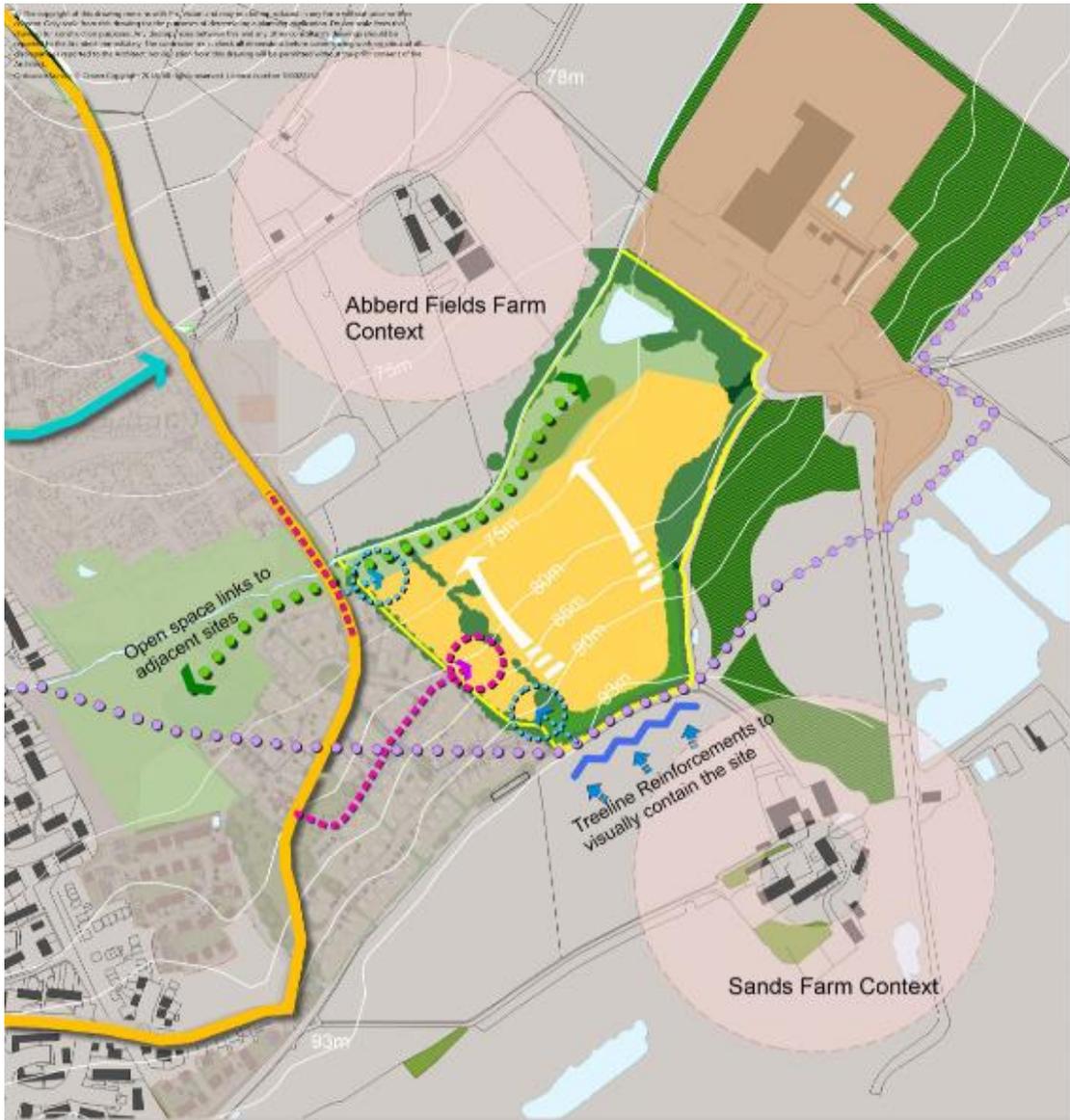
Approved layout 20/00481/REM with potential point of access

5.12 Landscape Consultants WHL prepared a “Preliminary Landscape and Visual Assessment of the Site in January 2019. This is reproduced at Appendix A. The development constraints diagram from that Report is reproduced below.



5.13 The Proposed Development Principles and Parameters for the Site can be summarised as follows (and are illustrated below):

- Principal access to the west via the recent housing development.
- Pedestrian cycle access to Low Lane.
- Green corridor along the northern boundary adjoining Abberd Brook forming part of the “Green and Blue Corridor Strategy”.
- Green buffer between new residential development and the industrial activities to the north (with appropriate noise mitigation strategy).
- Lower density development on the more steeply rising land to the south east.
- The developable area is likely to be limited to about 4ha with a capacity to accommodate up to about 120 dwellings.



Constraints and Opportunities Analysis

- | | | |
|---|---|--|
|  Opportunity for Residential Development |  Sands Farm Landfill Site |  Gateway Opportunity |
|  Existing settlement |  Woodland |  Pedestrian connections to footpaths and PROW |
|  Recent housing applications |  Existing and reinforced trees and hedgerows |  Link to emerging Public Open Space |
|  5m contours |  Existing Footpath (CALW16) |  Contain views into site with reinforcements and preserve the setting |
| |  Watercourse |  Proposed vehicular connection |



6.0 Conclusion

- 6.1 The LPR's proposed strategy of delivering a step change in the rate of growth at Chippenham will not be effective and has not been justified.
- 6.2 The LPR's proposed strategy of suppressing the level of growth at Calne is not justified. The Town is neither so environmentally constrained nor so sensitive that it cannot accommodate further strategic growth - particularly to the east.
- 6.3 The exclusion of the Site from the "Pool" of potential sites at Calne in the Site Selection Report for Calne is irrational and unjustified. The Site is clearly suitable for development in the manner proposed, either on its own or in conjunction with the adjoining sites that were included in the Pool. It would be entirely irrational to exclude this land from any comprehensive plan for further growth in this direction.

STRAT179

Main Settlement

Vistry Group fully support the identification of Salisbury as a Principal Settlement, which will be the primary focus for development and will provide significant levels of jobs and houses in the plan period. We have concerns at the level of growth proposed as it is too low. Further comments on this are made in our representations on Salisbury. Whilst we note that the plan period is 2016-2036, the Wiltshire Plan is only being extended by 10 years. We believe that a longer period should be considered. This is however at odds with the advice in the National Planning Policy Framework which states that Local Planning Authorities should plan for housing over a period of at least 15 years. The adopted Wiltshire Core Strategy covers the period 2016-2026 and this review seeks to extend the Plan by a further 10 years only. The NPPF states that strategic policies should look to cover a minimum of a 15 year period for adoption. On the Council's timescale, the Plan is unlikely to be adopted until 2023 at the earliest which will mean that the Plan has less than 15 years from adoption, at best probably 12 years. Indeed, it is likely to take longer to adopt the Plan. Accordingly, we believe that the period of time should be extended to say 2040 at least. In addition, if the timescale of the Plan is extended the housing and employment provision will need to be increased.

In view of the above, support is given to Salisbury's continued identification as a Principal settlement which should be the primary focus of growth.

Recommendations

- i) Continue to identify Salisbury as a Principal Settlement and primary focus for growth.
- ii) Extend the period of the Local Plan to accord with the advice in NPPF.
- iii) In line with ii) above increase the housing and employment land provision accordingly.

Delivery Principles

Vistry Group consider that the delivery strategy must meet identified housing and employment needs in the area for a period of at least 15 years, if the Local Plan is to comply with national policy. Accordingly in line with our representations on Main Settlements, the time period of the Core Strategy should be extended to at least 2040. Given the recognition of the key challenges for Wiltshire set out in the introduction and vision and the need for local economic growth, the Delivery Principles are not ambitious enough to have the kind of economic impact that the Vision correctly promotes and which Salisbury as a Principal Settlement needs. They raise objections to the total proposed housing provision for new homes in the period up to 2036. This needs to be increased to take into account the extended time period up to 2040 but also the fact that it is too low, in any event.

From an analysis of the housing need for the County and the respective housing market areas, it is apparent that it has been calculated in two ways i.e. as a minimum (10,470) and a higher figure (10,975). This represents a minimum figure using the standard methodology and a local housing need assessment which takes into account the longer term needs and economic requirements and produces the upper range result.

In line with our comments on the settlement strategy, we believe that the time period for the Local Plan Review should be extended to at least 2040. Furthermore, we believe that if housing needs are to be actually met, then a local housing need figure should be adopted. This is in part due to the fact that the housing figure in the adopted Core Strategy was below that which should have been provided for and that the Government's objective is still to boost significantly housing supply if local housing needs are to be met particularly affordable housing needs.

Accordingly by increasing the time period for the Plan this will result in an increase in the housing provision for the Plan period and the respective housing market areas.

Turning to the 5 criteria set out in the Delivery Principles, we would comment as follows:-

1. Vistry have no objection in principle to the creation of a set of place making parameters. However, they believe that these should be agreed not just with the relevant Town and Parish Councils but also with the development industry as it will be the development industry that will be delivering the majority of new development in the County in the Plan period.

2. If the Council are seeking to maximise the use of brownfield sites then they must ensure that the quantum of such sites are actually available and deliverable. The Council had previously identified Churchfields as a regeneration opportunity but it has failed to come forward due to landownership and other constraints etc. Furthermore, such sites tend to be more expensive to develop due to site surroundings, contamination, demolition of buildings etc. Accordingly, it is extremely important to ensure that these sites are deliverable and will provide the level of affordable housing and other benefits which are required.

Vistry are sceptical that the requisite of brownfield sites will be delivered at the rates anticipated by the Council.

3. If the Local Plan Review is to provide certainty, then the Council must allocate land for both housing and employment. By doing so it provides developers and third parties with certainty on the identification and delivery of development proposals. The Council should take the lead on the identification of sites within the Local Plan Review. Such an approach would ensure a supply of deliverable sites which would help meet the County's housing and employment needs.
4. We have assumed that this relates to the identification of additional development over and above that which is identified within the Local Plan Review. Concern is expressed at the Council passing responsibility for the delivery of brownfield sites to Neighbourhood Plans. The reason is that not all communities want to prepare Neighbourhood Plans. Furthermore, experience has demonstrated that there can be a time lag in the preparation of Neighbourhood Plans and some local groups do not having the necessary expertise.
5. Objections are lodged to this criteria which indicates that the Council may favour the delivery of greenfield sites in favour of brownfield sites. Firstly, there are no such requirements in Government guidance to introduce a sequential approach towards a brownfield sites first approach. Furthermore, the potential introduction of a phasing policy on greenfield sites would affect their viability. There is no need to introduce phasing if the Council's evidence on the viability and deliverability of brownfield sites is robust. This approach will severely hamper the deliverability of greenfield sites.

Salisbury

Objections are lodged to the proposed housing provision for Salisbury. As set out, it is intended that some 410 dwellings between 2021-2038 will be delivered from brownfield sites and the overall residual requirement and Salisbury is just 94. In line with our previous representations, we believe that the housing provision for Salisbury is too low and should be increased. The proposed housing provision is ultimately a reduction over the adopted Local Plan and given the Government's requirement to boost housing supply that local amount be in line with Government policy.

SB1 What do you think to the scale of growth? Should there be a brownfield target?
Should this figure be higher or lower?

Vistry Group fully support the identification of Salisbury as a principal settlement which should be the focus of significant additional growth in the Local Plan period (which should be extended). As you are aware, Vistry control land to the north and south of Netherhampton Road which is allocated for a residential led development in the adopted Site Allocations DPD under Policies H3.1 and H3.3 respectively. The land to the south has outline planning permission for up to 640 dwellings, a primary school, employment, local centre and open space under Application No. 19/05824/OUT. A reserved matters application is shortly to be submitted for the first phase of residential development. The land to the north of Netherhampton Road, is allocated for up to 100 dwellings and Vistry have entered into pre-application discussions with the Council with a view to submitting a detailed planning application.

The identification of these sites and their imminent delivery shows that this is a sustainable location where the Council has identified and encouraged development to come forward.

The Local Plan review proposes a requirement for Salisbury of 5,340 dwellings in the Plan period. When existing completions are deducted this only leaves a further 940 dwellings to be accommodated in the period up to 2036. Vistry believe that for a principal settlement, this level of housing is unlikely to meet identified local needs. It is only approximately 94 dwellings per annum (i.e. 2026-2036) and belies Salisbury's status as a principal settlement. Furthermore, Vistry do not believe that additional housing development should be assigned to Neighbourhood Plans as there is no certainty for them to be prepared, nor are sites identified necessarily deliverable or of a scale that can make a meaningful contribution to affordable housing or infrastructure. Vistry believe that the Local Plan Review should have its end date extended and that the overall housing provision should be increased if housing needs are to be met.

With regards the level of brownfield sites, concern is expressed at the quantum of brownfield sites and their deliverability. There is nothing in the evidence base that provides confidence that brownfield sites will come forward at the necessary rates. The Council had previously identified land at Churchfields for redevelopment but due to the complexities of land ownership etc, the site was deemed to be undeliverable in the Plan period. These issues are

extremely common with brownfield sites and it is important that robust evidence is available to demonstrate that the quantum of brownfield sites is deliverable. At present the evidence is not available.

Recommendation

The end date of the Plan should be extended until at least 2040. The level of housing provision for Salisbury should be increased.

That further evidence is required on the deliverability of the quantum of brownfield sites identified. At present it is unclear whether these sites are truly available and deliverable.

SB2 Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?

Vistry agree that expanding the affordable housing provision particularly for education and healthcare key workers is extremely important. However, given the significant need for affordable housing in and around Salisbury and the fact that the majority of affordable housing if provided as part of the open market housing scheme it is imperative that sufficient open market housing is provided. At present as stated in our response to Q.SB1, the level of open market housing is too low if this objective is to be met in any meaningful way.

SB3 Do you agree these sites are the most appropriate upon which to build?

No, we believe that the quantum of development is too low and that further sites for housing development should be identified. As stated in response to Q. SB1, Vistry will be developing land to the north and south of Netherhampton Road, Salisbury in 2021. Vistry also control further land (5 ha) to the north of Netherhampton Road (see attached plan) which they consider makes a logical extension to their existing development proposed. Development of that land would not extend Salisbury beyond boundaries already approved to the south of Netherhampton Road.

With regards land to the north of Netherhampton Rod, we would comment as follows: -

What is the amount of development proposed?

Vistry consider that the site can accommodate approximately 100 dwellings whilst taking account of the need to consider the setting of the Cathedral and views towards it.

The site is relatively free from constraints and the development can be accommodated without particular issues. Further detailed discussions need to take place with the Planning Authority and other interested parties including the local community but that there are no issues which would prohibit the delivery of the site.

What is the likely impact of the proposed development on the following factors and do any of these indicate that the site should not be allocated?

Biodiversity, in particular but not restricted to European protected habitats and species

The site has been intensely farmed for many years. A range of biodiversity surveys have been undertaken over the last few years by retained consultants.

No part of the site is covered by any statutory or non statutory designations. Harnham Slope Local Wildlife Site (LWS) is located to the south of the site but will not be affected by the proposed development.

Whilst surveys have indicated a number of protected species on the site, namely breeding birds, bats, badgers and reptiles (slowworms), the site can provide sufficient ecological mitigation and habitat creation/enhancement within areas of open space to ensure that a significant net gain to biodiversity is achieved.

Green infrastructure and agricultural land

There will be a loss of agricultural land as a result of the allocation. However, the Council requires green field land to meet their housing requirements.

The proposed development will have significant green infrastructure provided as part of the proposals including a central area of open space. This includes amongst other things a LEAP together with areas of informal open space.

Landscape quality and character

The site is not identified within any statutory landscape designation nor is it considered to be a 'valued' landscape. The recurring theme of landscape character outside of Salisbury is a landscape subject to large scale and intensive agricultural management in which components

of the rural downland stand out either as landmark elements (such as hedgerows or smaller elements of woodland).

The landscape is compromised in this location with the industrial sheds on the Harnham Business Park and the Auction Centre. In addition, the site abuts the existing allocation H3.3. As such, the landscape has the ability to assimilate sensitively planned development.

Heritage assets

There are no designated heritage assets within the site. Designated heritage assets do exist in the surrounding area but are some distance from the site such as Salisbury Cathedral. Given the nature and distance of these assets, it is not considered that their setting would be affected to preclude development or to materially affect the site's capacity.

The Cathedral is a notable and positive feature in the landscape. However, the development provides the potential to deliver a high quality bespoke residential scheme similar to the adjacent site.

The site does lie within a landscape of high archaeological potential. A series of archaeological site investigations i.e. trial trenching has been undertaken. There has been nothing found within the allocation of archaeological importance.

Strategic and local infrastructure including transport

Access can be achieved to the requisite highway standards off Netherhampton Road. With regards utilities, there are no issues subject to the usual upgrades and all of the required utilities are available for the site.

The efficient operation of the transport network, highway safety

The development can be accommodated within the highway network without detrimental impact on highway safety subject to suitable mitigation. The Council has undertaken a transport modelling exercise for Salisbury which demonstrates that development of the site can be satisfactorily accommodated.

Air and water quality, noise pollution, odours, land stability, groundwater and flood risk

There would be no detrimental impact on any of the above issues. There is no issue regarding land stability. The proposals would not impact on groundwater and the site lies within Flood Zone 1. Drainage proposals would be designed to meet the EA's requirements

including an element of climate change. There are no noise receptors which would be detrimental to the development and the site does not lie in an Air Quality Management Area.

Open space, recreational facilities and public rights of way

Open space and recreation facilities could be provided which more than meet the Council's requisite standards. A range of open space would be provided throughout the development. There would be no requirement to divert any public rights of way.

The site is in an accessible location with good access to everyday facilities by a range of means of transport?

The site is well located within proximity to a range of existing facilities within the adjoining urban area of Harnham. This includes pubs/restaurants, hotel and St George's church and community hall at Middle/Lower Road – all circa 1.5km from the centre of the site.

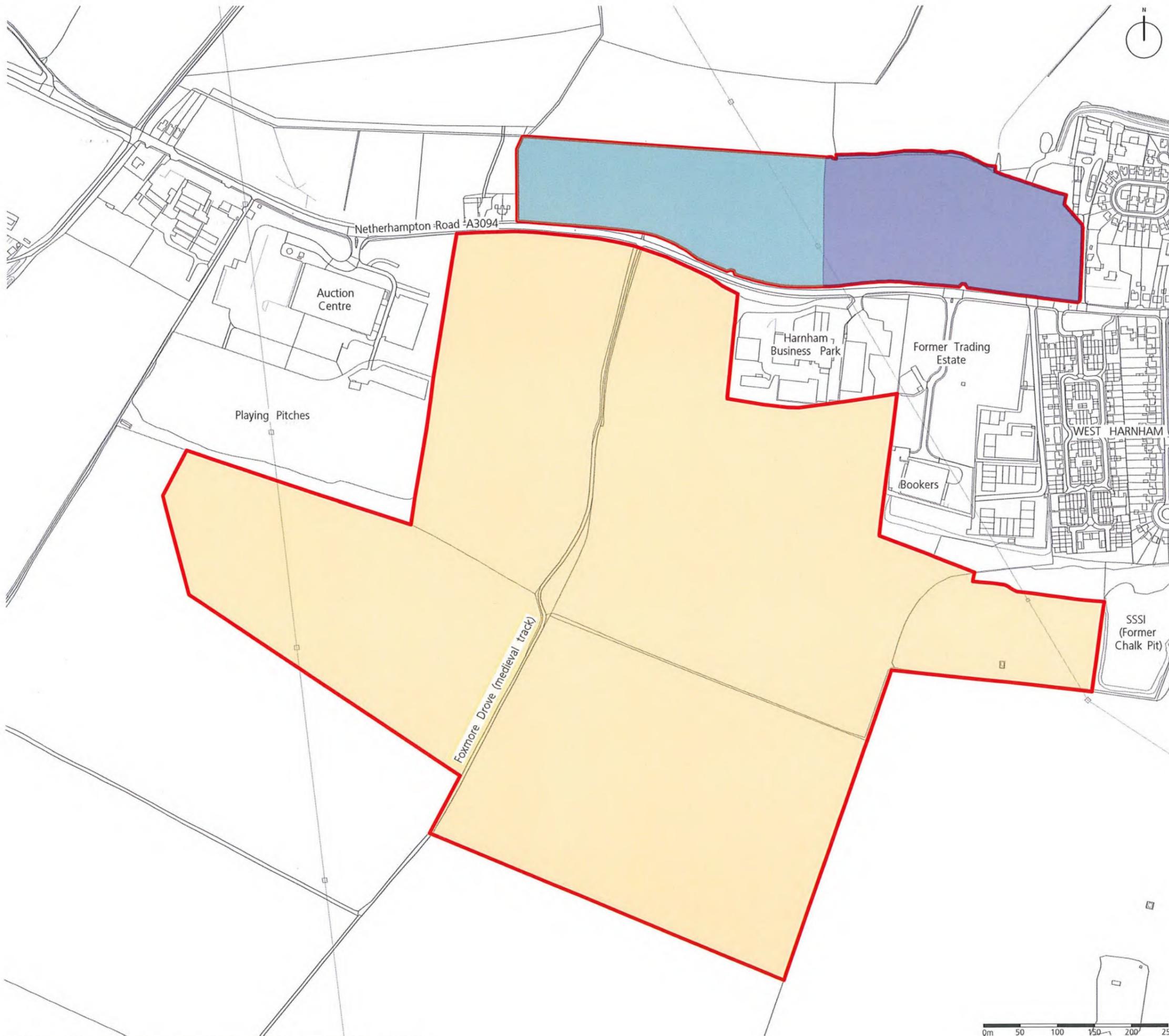
Harnham Infants and Lower Schools are located on Saxon Road around 2km from the centre of the site. There is also a small convenience store and takeaway located on Norfolk Road, around 1.2km from the site. An area of formal sports pitches lies immediately west of the site. Moreover, a new primary school and pre-school will be constructed on the allocated land directly to the south, which now has the benefit of outline planning permission.

Existing routes between the site, local facilities, the schools and the City Centre are generally of a good standard, with accessible footways and public footpaths, including the picturesque 'Town Path' across the water meadows and 'Long Bridge' leading to the City Centre.

The closest existing bus stops are located on Netherhampton Road to the east of the site. Salisbury Road service R5 offers a half hourly service between Harnham and central Salisbury Monday to Saturdays with an hourly service on Sundays. There is the opportunity to extend the R5 service towards the site as part of the development of land to the south of Netherhampton Road (Policy H3.1).

Availability

Yes within the next 5 year period. The land is proposed to be brought forward by a leading residential developer and not a promoter, working with a willing landowner.



- Site Area Total (72.78ha)
- Parcel 1: Draft Allocation H3.1 (61.22ha)
- Parcel 2: Draft Allocation H3.3 (5.75ha)
- Parcel 3: Additional land under Bovis control (5.81ha)

client
Bovis Homes Ltd

project title
Land at Harnham, Salisbury

drawing title
Land Parcel Measurement

date 05 SEPTEMBER 2017 drawn by LP
drawing number EDP2810/34c checked CG
scale 1:5000 @ A3 QA

edp the environmental dimension partnership

Info@edp-uk.co.uk www.edp-uk.co.uk
Cirencester 01285 740427 Cardiff 02921 671900 Shrewsbury 01939 211190

SB4 What are the most important aspects to consider if these sites are going to be built on?

Vistry believe additional land should be identified as stated in our response to SB3.

SB5 How can these concept plans be improved??

N/A

SB6 Do you agree with the range of uses proposed? Which other uses should be considered?

N/A

SB7 Do you agree with the location of the proposed uses? What should be located where and why?

N/A

SB8 Do you agree with the proposed locations for self-build and custom-build housing? Would you prefer alternative locations?

N/A

SB9 Is there any other issues or infrastructure requirements that should be identified?

The development of land to the north of Netherhampton Road does not require significant infrastructure and it can be provided as part of the proposed development.

STRAT185



8th March 2021

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

Dear Sir / Madam

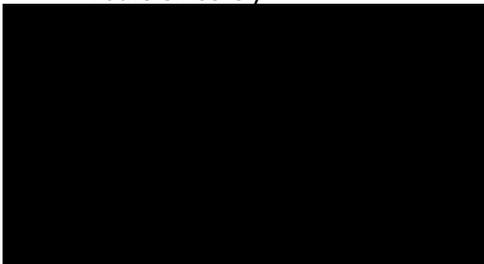
Wiltshire Local Plan Review January – March 2021

Please find enclosed, on behalf of and under instruction from our client, a detailed representation to the Wiltshire Local Plan Review comprising the 'Emerging Spatial Strategy' and the 'Empowering Rural Communities' documents.

These submissions have carefully reviewed and assessed how the Council is proposing growth to be distributed around the County and how it sets out to improve the framework for rural communities to meet housing needs.

We look forward to hearing from you in due course. In the meantime, we hope and trust that all is in order with this submission. Please do not hesitate to contact us in the event that further information is required or considered beneficial.

Yours sincerely



Introduction (Wiltshire Local Plan Review)

We are pleased to provide this representation in response to the current consultation on the Wiltshire Local Plan Review, specifically the 'Emerging Spatial Strategy' and the 'Empowering Rural Communities' reports. We understand that this consultation is open between 13th January 2021 – 9th March 2021.

To summarise our representations, we consider it appropriate for Wiltshire Council to pursue a high-growth option within the Local Plan in order to address key issues that the Council and the County are facing in relation to local housing need within rural areas to the west of Swindon. These representations are focussed on the Preferred Strategy for the Swindon Housing Market Area.

The spatial distribution of growth must include a focus on rural settlements (as well as primary urban settlements) in order to succeed in accelerating high-levels of growth, and to ensure that local needs can be met within these settlements.

Our response to each of the consultation questions, within each paper, are outlined in turn below:

Emerging Spatial Strategy

Please outline any comments you have regarding the Emerging Spatial Strategy.

1. Growth and Climate Change

The strategy clearly outlines that addressing climate change is already a Local Plan objective and that the aim of the plan is to focus growth on the main settlements within the county. Whilst this would be expected in order to ensure that growth is distributed appropriately to help address climate change, paragraph 2.2 of the strategy outlines that '*a large proportion of Wiltshire residents live in the countryside and smaller rural settlements.*' As such, the approach to focus growth on the main settlements, and thus, negate the majority of residents within the county living within rural areas, would not be considered an appropriate approach to meet local needs. Growth within these rural settlements can be undertaken with minimal detrimental impact upon climate change through appropriate schemes.

In addition to the above, locating housing and employment uses within rural areas would meet one of the Council's climate change outcomes as outlined below:

'reduce the need to travel, and travel by the private car in particular, by providing jobs, facilities and services locally and support active means of travel such as walking and cycling.'

Areas where both housing and employment land are located within proximity of one another would result in a decrease of the use of private cars within the county and would enable residents to travel sustainably through active means of travel such as walking and cycling. Limiting development of such uses to the principal settlements and market towns would result in an increase in the use of the private car for the majority of residents in the countryside and therefore, would result in the outcome listed above not being achieved within the plan period.

2. Swindon Housing Market Area (HMA)

The strategy clearly sets out alternative development strategies proposed within the Swindon Housing Market Area which were tested through Sustainability Appraisal. The alternative development strategies are as follows:

- Swindon A (SW-A) – Roll forward the core strategy pattern of distribution.

'Housing and employment land requirements are reduced by 16% and distributed pro-rata rolling forward the current strategy.'

- Swindon B (SW-B) – Focus on Royal Wootton Bassett

'Housing development is constrained at Marlborough to current commitments (plus windfall allowance and growth in rest of HMA reflects assessed need (-16%). No further development beyond existing commitments west of Swindon.

The balance is focussed on Royal Wootton Bassett (from about 900 homes in SW-A to about 1,300 homes).

New employment land proposed only at Royal Wootton Bassett.'

- Swindon C (SW-C) – Focus on the rest of the HMA

'Growth in Marlborough and the rest of the HMA continue Core Strategy rates of housing growth. Development is reduced at Royal Wootton Bassett. No further development beyond existing commitments west of Swindon.

New employment land only proposed at Marlborough and rest of the HMA.'

These representations consider and promote that option SW-C is the most appropriate to accommodate growth in the HMA. Following sections present a supporting case.

Housing Need in Rural Areas

In relation to the conclusions from the Sustainability Appraisal of the above growth options in the Swindon HMA, paragraph 3.66 outlines that SW-C is the *'worst performing option because of concerns relating to landscape, heritage and transport impacts. The emerging strategy therefore proposes the rural area continues broadly the same proportion of growth it would receive taking forward the current strategy, adjusted for a slightly lower overall need for the HMA as a whole.'*

As forementioned, the majority of residents within the County live within the countryside / rural settlements and therefore, this conclusion of option SW-C above outlines that the local needs of these residents have been ignored. Within the Sustainability Appraisal, page no.176 outlines that this option would result in a provision of 1255 dwellings and 3ha. of land allocated for employment within the rest of the HMA. The other two options would result in 1030 dwellings proposed with no employment land allocated. Therefore, these two other options would result in a lack of development in the rest of the Swindon HMA and would fail to deliver an appropriate amount of housing and employment within the plan period.

SW-B Option

Option SW-B which is considered to be the focus of development within Royal Wootton Bassett, will result in additional pressures on the countryside within this region in the Swindon HMA. Paragraph 3.68 outlines that there are concerns about the capacity of local education and health services at the town itself. By concentrating development here, where there are already existing urban pressures within the town, it will only exacerbate the issues whilst also having significant pressure on the existing infrastructure.

SW-C Option

Option SW-C would result in a concentration of growth in Marlborough in addition to the rest of the HMA comprising rural settlements / countryside, and paragraph 3.69 of the Emerging Spatial Strategy informs that there are currently particular concerns regarding local housing affordability and provision for local jobs within the town. Therefore, the conclusion that this option is the worst performing option within the strategy and that this will not be the approach that the Council will take forward, will result

in these issues being carried through the plan period unresolved. Given the current economic climate of the UK, with unemployment rates at its highest in decades, the failure to recognise that Marlborough and the rest of the HMA requires allocated employment land will result in rural communities being left behind and undermine their viability. This will also result in urbanisation within the County as residents will need to migrate to urban areas in search of housing and employment given the high house prices and lack of employment opportunities in the rural countryside. As such, the approach to go with Option SW-B rather than SW-C, will result in the issues highlighted in the paragraph above exacerbated, and local need within Marlborough and the rest of the HMA not being met.

Paragraph 3.76 does, however, acknowledge that the Marlborough Area Neighbourhood Plan will carry out the role of finding suitable land to need local needs for housing and employment and the additional infrastructure necessary to support such growth. We agree that this needs to be undertaken to ensure that the aforementioned points are addressed within the County.

Housing / Employment Need

The extract below outlines the assessed commuter flows between HMAs and associated change in the workplace population resident in each Study Area.

Housing Market Area (residence)	Change in workers to fulfil jobs within Study Area		Housing Market Area (workplace)				
	5-year migration trend	10-year migration trend	Chippenham HMA	Salisbury HMA	Swindon HMA	Trowbridge HMA	
Chippenham HMA	+1,714	+2,207	81.3%	2.4%	10.5%	5.9%	
Salisbury HMA	+6,013	+5,712	2.5%	91.5%	1.2%	1.8%	
Swindon HMA	+9,207	+9,020	3.6%	0.6%	95.4%	0.4%	
Trowbridge HMA	+3,268	+3,272	11.9%	4.5%	1.6%	78.2%	
TOTAL	5-yr trend	+20,202	-	+2,279	+5,924	+9,092	+2,906
	10-yr trend	-	+20,211	+2,666	+5,651	+8,961	+2,933

Extract of Figure 11 within Swindon Borough Council & Wiltshire Council Local Housing Needs Assessment 2019

As clearly shown, the estimated 5-year and 10-year migration trend for the change in workers to fulfil jobs within the Swindon HMA, is significantly more than the other HMA's within the County. This exemplifies the need to locate new employment land within the HMA to ensure that there are sufficient employment opportunities for local residents, and thus, meeting local need. This further builds on the point to locate both housing and employment within the same locations to ensure that there are opportunities for residents in these communities and that they do not require commuting to other HMA's. Of course, by locating employment and housing within the same locations, it helps the Council to achieve their climate change outcomes by reducing the reliance of private car and the promotion of sustainable travel within the County. Therefore, it is considered vital that development is focus within areas in the rest of the HMA to ensure that the above is met.

Empowering Rural Communities

Do you agree there should be a target of 40% affordable homes on all new schemes of more than five dwellings? What other approaches might there be?

In the current Spatial Strategy, the provision for affordable homes in rural areas is at least 40% (net) and therefore, we agree with the proposal to retain this provision as it represents an appropriate approach in order to meet local identified need in the rural communities of the County. However, where developers are able to demonstrate that this is economically unviable, consideration should be given to

off-site contributions to ensure that required residential development isn't restricted within rural areas in the County.

Do you agree with the approach set out in the suggested policy? (Revised Core Policy 44) If not, why not? How could it be improved?

The above approach in Core Policy 44 restricts the type of residential development permitted within rural areas and thus, fails to meet the local needs of residents in rural communities in the County. Whilst it is acknowledged that house prices are higher in rural areas, the proposal to limit the inclusion of up to 25% of open market housing within affordable housing exception sites would result in a lack of delivery of market housing within the plan period. The main aim for the Council should be to retain residents currently living in rural communities to ensure that the existing pressures (including lack of housing, traffic congestion, school places etc.) aren't worsened in the Principal Settlements and Market Towns in the County. As such, we would propose that this limit (of residential development) is increased to ensure that these issues do not arise as a result of the implementation of this policy and to ensure that rural areas remain viable for developers to develop residential sites and therefore, contribute to overall housing delivery in HMA's.

Do you think this approach is worth pursuing?

The Council proposes to have just one policy as a basis for determining applications to meeting local housing needs within rural settlements. In terms of community led housing and affordable homes, this approach provides clarity of what would be acceptable in principle for such planning proposals at these locations in order to meet local housing need.

In terms of community needs and dwelling size, we agree with the statement that communities with a better mix of households provide greater resilience in light of the current housing market trends and economic climate.

In terms of the proposal of withdrawing permitted development rights on new small homes in rural areas, we disagree with this proposal as it will restrict occupant's flexibility to extend / alter their homes to fulfil their needs. Rural populations are generally older in terms of age and as such, proposals to make changes to their homes are in some cases required to ensure that their health / well-being is preserved and enhanced where possible.

What local evidence would be needed to justify applying restrictions like these?

We have no comment to make in relation to justifying the proposed permitted development restrictions on new small homes within rural communities.

To comment on the housing figure that interests you, please state which area of the county the settlement falls within.

Swindon (Wiltshire part) HMA.

What do you think to the housing requirements for Local Service Centres and Large Villages? Should requirements be higher or lower? If so which ones and why?

Paragraph 30 of the report outlines that 'Small Villages have a low level of services and facilities, and few employment opportunities.'

Whilst this is agreed in general, this statement makes an assumption for all Small Villages across the county and fails to take into consideration the proximity that some of these villages are located to adjacent urban areas. Where opportunity arises, these small villages can play an important role in supporting the function of these urban areas and accommodate development comprising residential

and employment uses. Even though that the general perception of Small Villages in the County is that they have limited provision of facilities and services, those located within proximity to urban settlements have access to these amenities here, and therefore, issues relating to the this can be addressed through appropriate location of development. Subsequently, limiting development in these locations to only infill would result in the loss of opportunities to develop appropriate developments in these small villages that can help address local need and support the important urban functions of adjacent Principal Settlements and Market Towns.

As outlined in paragraph 78 of the National Planning Policy Framework, it states that '*planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services.*' Given this, it would be considered prudent to include Small Villages in identifying opportunities to grow and thrive, in order to meet local need and help support local services in both the village itself and adjacent communities.

Housing Market Area	No. of homes at Main Settlements (2016 to 2036)			No. of homes in Rural Areas (2016 to 2036)	
	Principal Settlements	Market Towns	Local Service Centres	Large Villages	Elsewhere
Chippenham	9,225	8,370	100	1,435	1,265
Salisbury	5,240	3,190	1,070	880	590
Swindon (Wiltshire part)	n/a	1,935	530	540	10
Trowbridge	5,830	4,220	0	655	295

Extract of Proposed no. homes in Rural Areas

As illustrated in the above extract, the paper sets out that the housing requirement for locations elsewhere in Swindon (Wiltshire part) amounts to 10 dwellings. We consider this to be counter-productive and conservative in allocating such a small amount of residential development in these locations where they would be able to deliver appropriate housing with minimal environmental and social impacts. As shown in the table, allocations elsewhere in the other HMA's have much higher housing requirements that the Swindon HMA. In terms of percentage allocated in these locations to the overall requirement in each HMA, it is much higher in these other HMA's as shown below:

Housing Market Area	Total Requirement	Elsewhere Requirement	% of Total Requirement
Chippenham	20,395	1,265	6%
Salisbury	10,970	590	5%
Swindon (Wiltshire part)	3,015	10	0.3%
Trowbridge	11,000	295	2.6%

As clearly depicted above, the percentage of housing set out required in 'Elsewhere' locations in the Swindon HMA is considerably lower than the requirements in the other HMA's. Therefore, we consider this approach to be negligent and that consideration should be given to set out a higher requirement within these rural locations in the Swindon HMA.

Summary

Option SW-C is our preferred options for locating development within the Swindon Housing Market Area (HMA), for the reasons outlined in this letter.

This Growth Option provides the best opportunity for Wiltshire Council to address the key issues, challenges and opportunities that the County faces over the plan period.

STRAT186

Our Ref: LPC2513

8 March 2021

Spatial Planning
Economic Development and Planning
Wiltshire Council
County Hall
Trowbridge
BA14 8JQ

Dear Sir/Madam

**Wiltshire Local Plan Review consultation
Representations on behalf of Mr A Ford**

This representation has been prepared by LPC (Trull) on behalf of [REDACTED], who is a landowner within the Wiltshire Council boundary. It is submitted in response to the current consultation on the Wiltshire Local Plan Review (hereafter referred to as 'the Local Plan Review').

We have reviewed the consultation content, including the published supporting evidence base and provide our comments in the subsequent sections of this representation. Particular focus is made on the 'Empowering Rural Communities' document and its potential impact on Upavon, Pewsey.

Emerging Spatial Strategy

The general direction of the spatial strategy, which continues to adopt the existing settlement hierarchy established by the Wiltshire Core Strategy Core Policy 1: Settlement Strategy, is supported. In particular, we support the continued classification of Upavon as a 'Large Village' within the hierarchy.

However, we reserve our opinion on any forthcoming policy relating to the Local Plan Review Settlement Hierarchy and how development will be guided in 'Large Village' areas. In particular, we urge the Council to adopt an approach that accords with the National Planning Policy Framework (NPPF) (2019), in so far that in rural areas development should be located where it will enhance or maintain the vitality of rural communities. Importantly, this does not mean development within Large Villages should only be located within a historic village boundary which is out of date, but rather adopting a more

holistic approach which acknowledges the physical circumstances 'on the ground' and allows for modest growth adjacent to village 'boundaries'.

Empowering Rural Communities

In accordance with the Emerging Spatial Strategy and retained Settlement Hierarchy, Large Villages (including Upavon) are defined as rural settlements that contain services and facilities that also serve a much wider local catchment. The Empowering Rural Communities document states that it is *'vital that planning supports the role of these settlements; that they grow in ways that sustain them. This means they should continue to accommodate new homes both on a scale that matches their size and importance and in ways that best meet each community's needs'*. This approach is supported.

However, we also note that the document also states the Council *'prefers sites for market housing to be identified by communities themselves through neighbourhood planning'*, and these sites will be generally at Local Service Centres and at Large Villages. Where site allocations are not made by neighbourhood plans, the Council state *"it may be necessary for the Council to allocate sites"* and this may be achieved by a review of the Wiltshire Housing Site Allocations Plan.

Given that Upavon remains undesignated in relation to a made Neighbourhood Plan (and is not even subject to an agreed Neighbourhood Plan Area, the first stage in the process), together with the innate delays which arise from such Plans being progressed, we strongly consider the Local Plan Review cannot rely on neighbourhood planning to secure adequate housing allocations to meet the identified housing need, and therefore must update the Wiltshire Housing Site Allocations Plan to include sites for many of the Large Villages, in particular Upavon.

Notwithstanding the above, Appendix 1 of the Empowering Rural Communities document identifies the baseline indicative housing requirement (2016-2036) for Upavon is 50 dwellings. In anticipation of the Council updating the Wiltshire Housing Site Allocations Plan to include new housing sites for many of the Large Villages which are not subject to a made (or well-progressed) Neighbourhood Plan, we wish to promote our client's site at Land adjoining Pewsey Road, Upavon.

Land adjoining Pewsey Road, Upavon

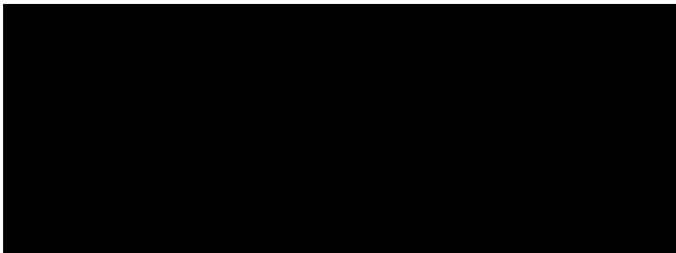
The above site has already been assessed within the Council's most recent Strategic Housing and Economic Land Availability Assessment (SHELAA) (2017) under reference 597.

Located immediately adjacent to the Upavon Settlement Boundary, the SHELAA (2017) identifies the site as Suitable (with no suitability constraints), Available, Achievable, Deliverable, Developable in the short term and capable of accommodating 63 dwellings.

We can confirm this site remains immediately available and stress that there are no constraints to development. As such, we respectfully request that this site is allocated for residential development through this Local Plan Review (and related Wiltshire Housing Site Allocations Plan update).

We trust the above is clear, however, please do not hesitate to contact me if you have any queries.

Yours sincerely,



STRAT191

Abbeyfield School Representation to the Local Plan and Future Chippenham Consultations

Abbeyfield School welcomes the opportunity to present its comments and become a stakeholder in all future consultations on Future Chippenham and the Local Plan. As the two consultations are inextricably linked this representation covers both consultations. The most important issues arising from these two consultations for the operation of the school include the amount of new homes and the number of new students; the proposed new 10 form year entry secondary school in the South Chippenham sector; and the safe, healthy and environmentally sustainable access to and from the school for its pupils, parents and staff. The latter issue relating to access is particularly sensitive to the School as reflected in its recently adopted School Travel Plan.

Abbeyfield School Travel Plan

The School adopted a Travel Plan in December 2020 to:

- reduce traffic congestion around the school
- highlight school travel and transport issues and problems and propose practical initiatives to make the journey feel safer and more enjoyable for everyone
- reduce the number of car trips made to/from school by parents, students and staff
- increase awareness amongst students, parents and staff about the health, environmental and safety benefits of more walking and other forms of sustainable and active travel
- provide a relevant focus for class work within the curriculum and increase the number of students benefiting from sustainable travel and road safety education
- encourage more walking and cycling to school thereby improving children's health and fitness through increased walking and cycling
- provide opportunities for consultation particularly with students and parents

The school curriculum covers aspects of road safety along with promotion of environmental and sustainable travel and health benefits. A sample survey across all year groups indicated the following percentage of travel to/from school:

Means of Travel	%
Car	42
Bus	16
Bicycle	2
Walk	38
Other	2

One of the main goals adopted includes increasing the % of students walking or cycling from 40% to 55%. Specific actions now in place include:

- Assemblies on travel awareness and promotion of walking / cycling.
- Promotion of national/local events e.g. National Bike Week, Walk on Wednesday, Road Safety Campaign
- Partnership with local council/police to raise awareness of speeding along the A4 and Stanley lane.
- Promote health benefits of walking/cycling (Healthy Schools)
- Student curriculum activities to lobby the local councillors and Wiltshire Council to illustrate the dangers and encourage improvements to the safety around the school site.
- Production of 'safe routes to school' map
- Additional cycle storage is being installed

The school's specific issues relating to the Future Chippenham consultation, which similarly apply to the Local Plan, are:

- The amount of non-school traffic in and around the school,
- Ease of access from surrounding residential areas to and from the school,
- Provision of physically separated and designated pedestrian and cycle paths to help encourage more non-vehicle traffic to the school and remove the conflict of walkways and cycle paths with vehicular traffic especially crossing the new road,
- Insure that Stanley Lane is useable for school and immediate access purposes only and not through traffic.
- Compliance with the School's adopted Travel Plan and the promotion of environmental and sustainable travel and health benefits

Whichever route option is chosen, the proposed Distributor Road will very likely become a ring road in all but name. In zones 3 and 4 it will provide access to new businesses in North Chippenham and J.17 of the M4. Importantly it will provide the best and easiest crossing point over the railway and river Avon on the east side of Chippenham.

The current and proposed growth of Chippenham will generate much greater traffic movements, thus the road infrastructure needs to be planned accordingly and not just for the period under consideration.

The consultation needs to include an assessment of the current and future traffic from surrounding communities, especially Calne/Derry Hill/Devizes and beyond, both accessing Chippenham and travelling around it to get to the M4 and the west.

The new road needs to provide a right of way to allow for expansion up to 4 lanes.

The road analysis must include an analysis of possible junctions and the type of junction. This should not be developer led/negotiated. Principles need to be established as to where and on what basis rather than just because the developer is funding the cost. The school is particularly concerned about Stanley Lane becoming a “rat run” and there will need to be measures to restrict non-school traffic.

We welcome the improved accessibility to and from the school and it appears that Stanley Lane is to be upgraded. Any upgrade of Stanley Lane must address the current dangerous problem of traffic, parking and children crossing it especially at peak drop-off/pick-up times that will only become greater with the proposed expansion of Abbeyfield and a new primary and nursery school opposite. The solution to the pick-up/drop-off problem will require either an on-site or off-site solution or even a combination of both.

Staggering the “best fit” route at the A4 as suggested in the Future Chippenham webinar will likely cause congestion on this particular stretch of the A4 that currently backs up most weekdays at the junction of Pewsham Way and the London Road often at school drop-off and pick-up times. The backup of traffic is quite often as far back as Forest Gate to the east. The staggering of the road and the new development will only combine to exacerbate this problem. The intersection of the A4 with the distributor road must be as far as possible from the Pewsham Way/London Road roundabout to prevent traffic jams developing between the two intersections.

We welcome the inclusion of physically separated cycle lanes and foot paths along the new road. However, route options B and C dissect residential areas in zones 3 and 4, such that pedestrians and bicycles must cross the road at junctions. Only option A mostly runs around the border of the new residential areas. We see an important goal of this new road is to encourage pupils and their parents to use bicycles or walk to the school to reduce school run traffic as well as traffic in general. It is critical for this goal that there is no possible conflict between vehicle traffic and pedestrians and cyclists. Having the road run around the perimeter of the new residential areas is much the safest and possibly best economic solution by the time mitigation measures are included in the cost.

Measures will be needed to address pedestrian/cycle access along and across the A4 and Pewsham Way to/from the residential areas in zone 2 and zone 3.

Local Plan

The Local Plan states “there is no capacity within the secondary schools at the town”. Abbeyfield is currently slated to receive a Yr7 intake in September 2021 of 120 pupils. The current PAN is 180. The school is under capacity in all year groups at present. Abbeyfield is currently projected to be expanded under the existing Local Plan to a PAN of 240 and possibly up to 270.

A new 10 form year entry school in the south Chippenham sector and the pupil numbers needed to support such school needs to be justified in light of current pupil numbers in Chippenham and the capacity at Abbeyfield.

We welcome the location of a new Primary and nursery opposite Abbeyfield. However, traffic conflicts need to be carefully considered and any through traffic discouraged/prevented.

Conclusion

The “best fit” route for the distributor road from the school’s perspective is option A, at least in zones 3 and 4, East Chippenham. The road will act as the perimeter to the new development so that cycle lanes and pedestrian paths will not need to cross the road and also remove the incentive to cross at non-junctions. We also trust our concerns about Stanley Lane are addressed as we are extremely concerned about the current traffic issues, let alone what might happen in the future.

We see these consultations as a unique opportunity for the pupils of Abbeyfield School to become actively involved in the shaping of their own environment, thus request the possibility of hosting their presentation on-site. Our pupils will live with the consequences of this Local Plan, thus deserve a say in its adoption. While the above comments have been principally directed at the operational aspects of the School, the pupils no doubt will have environmental and climate concerns too.

STRAT192



Consultation Response

Wiltshire Local Plan Review
Consultation Draft
March 2021

1.0 Introduction

This document represents a formal response by Salisbury Reds regarding the above Local Plan consultation. Salisbury Reds are part of Go South Coast - a wholly owned subsidiary of The Go-Ahead Group, which operates buses in many parts of England. Locally, Go South Coast operates across the south coast with its core networks based in Southampton, Poole & Bournemouth, Salisbury, Swindon and the Isle of Wight as well serving the rural communities of Dorset, Hampshire and Wiltshire. With a fleet of over 800 vehicles across all brands, we help our customers make over 47 million journeys annually. We are a major employer in the south of England with over 1900 colleagues delivering services every day of the year.



Figure 1: Go South Coast Operating Area

Bus services are provided primarily through the route networks of [more bus](#), [Salisbury Reds](#), [Swindon Bus](#) and [Bluestar](#) and [Southern Vectis](#). These networks are in the majority commercially operated but there is significant involvement in the tendered local bus market, together with school and college movements. The prestigious contracts to operate bus services for the University of Southampton - [Unilink](#) & Bournemouth University - [UNIBUS](#) are currently held, together with contracts for other higher education providers.



Figure 2 – Salisbury Reds City Network

Salisbury is home to Salisbury Reds which as well as operating a comprehensive city network also connects via inter-urban routes to Bournemouth, Fordingbridge, Ringwood, Southampton, Romsey, Andover, Marlborough, Swindon and Amesbury. We also are the park and ride operator for Salisbury. The city and country networks are shown in figures 2 and 3 respectively.

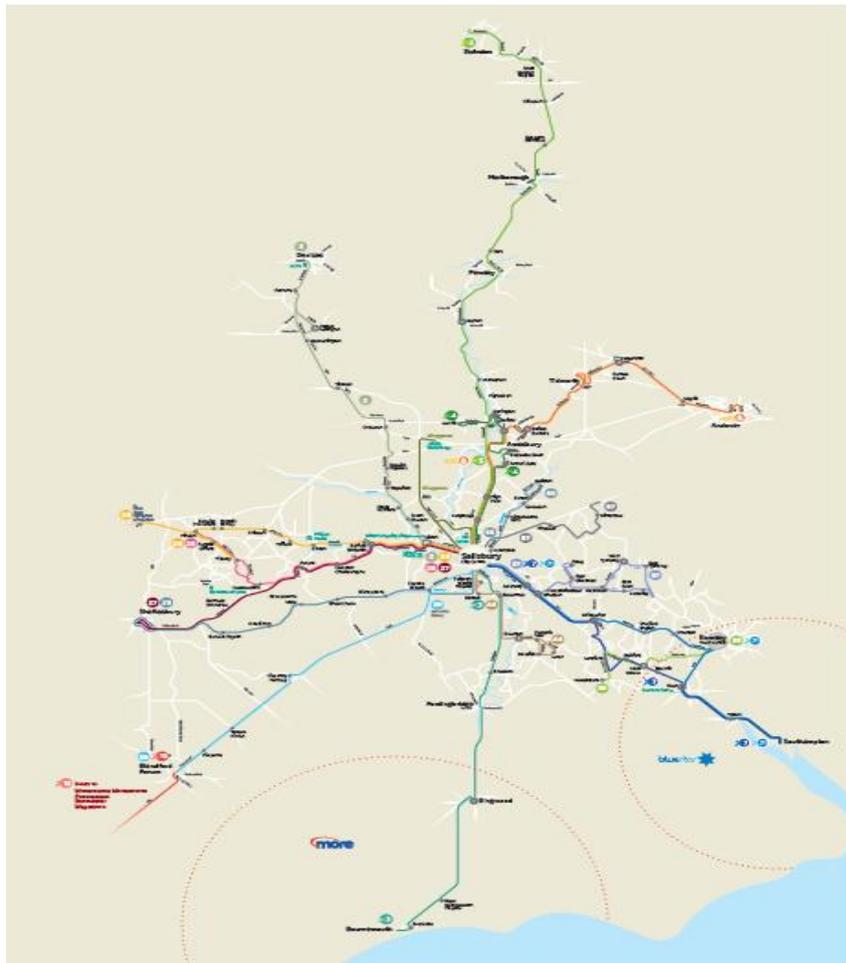


Figure 3: Salisbury Reds Country Network

2.0 Why we're Responding

As one of the main bus operators in south Wiltshire although our sister operating company, Swindon Bus operates in parts of north and west Wiltshire as well as Marlborough. We have a responsibility to ensure new developments are better connected and more sustainable and our response is made in this spirit.

3.0 Our Response

We thought it useful to set the context of the issues likely to affect Wiltshire in terms of new development and public transport (bus). Firstly we discuss issues related to largely rural areas such as Dorset including access to work and employment, followed by a discussion on the level of rural services acknowledged in a report by the County Council Association in December 2020, before going on to make the case for bus friendly development. Finally, we deal with the overarching strategic approach laid out in the plan before discussing site specific policies and allocations.

Whilst we appreciate these sites are not allocated as such at this stage we are proposing suggested policy wording where we think the existing site assessments or overall planning approach is remiss. We also highlight how we would like the site dealt with to enable it to be serviceable by non-car modes and where any such policy or site development would be likely to gain our support.

4.0 Trends – Issues Facing Rural Areas, Access to Work and Employment & Social Isolation

Research by *Greener Journeys* show bus users create more than £64 billion worth of goods and services per year, and that there is a significant relationship between accessibility by bus and employment. A 10% improvement in access to bus services would mean 50,000 more people in work – equally, reduced access would mean that communities can become cut-off as well as contribute to an increase in unemployment.

Poor access to public transport can have a devastating impact on rural areas. If people do not have access to a car, they can be reliant on buses to get to school, hospital, visiting friends or to go to the shops. If that bus service disappears it can leave whole villages completely isolated.

For many people in rural areas buses are essential, not just for work and education, but for independence. Buses are also important for leisure use, helping people gain access to and travel around the countryside more sustainably; they often also contribute to the overall visitor experience.

Young people need reliable and affordable bus services in order to access education and employment, particularly apprenticeships. This will remain the case in the short to medium term as new technology is rolled out and becomes viable for sparse communities. Entry level jobs tend to involve unsocial hours and weekend travel so anything which would impact on people's ability to access employment needs careful consideration if it is not to have a detrimental impact on the ability of employers to find and retain local staff. This means that the apparently simple step of cutting evening and weekend bus services is often causing harm to those most in need.

For older people buses are a lifeline away from isolation and loneliness, giving them access to social activities, health services and shops. Accessible public transport is often crucial in keeping disabled people connected to their communities. Many older people in rural areas rely entirely on bus services to access healthcare, social activities, community events and shops, as well as visiting friends and family. Buses often act as a social tool to enable older people to meet on the bus.

The "*Later life in rural England*" report by Age UK is a wide-ranging assessment of the challenges facing older people living in rural areas, with lack of transport identified as a major issue given that 35% of older households do not have access to a car. The report highlights the importance of regular, convenient and reliable bus services to the lives of older people and identifies reductions in service as a serious concern, impacting on all aspects of their lives. It calls on local authorities to recognise the wider value of bus services in preventing social isolation and to base funding decisions on impact assessments and not simply cost and the number of people using a service.

Decreasing access to buses often increases the burden on other parts of Local Authority budgets such as social services which will have to deal with more cases of depression and anxiety. Access to community groups provides help and support upon which the NHS and social services currently rely and the removal of that access would cause additional burdens on child and adult social care budgets.

5.0 Reversing the Decline of County Buses

In December 2020 the County All Party Parliamentary Group Inquiry published *"Reversing the decline of County Buses"* which reported that the number of journeys by bus between 2009 and 2019 had declined by 97 million journeys – with 16% of all passenger journeys on England now taking place in County Areas. It also noted that over 3,000 bus routes had been reduced, altered or withdrawn between 2010 and 2018. The report identified a £348.5m funding gap in County Council budgets with socially necessary bus funding being reduced to cover children's and adult social care. This clearly demonstrates the need for funding and network development to be prioritised in a new manner that acknowledges the contribution transport makes to other policy areas.

The report identified that commercial networks no longer provide adequate rural transport and it made several recommendations. Amongst these was a need to identify long term funding solutions, improved partnership arrangements and working together between the public, private and third sectors to optimise route networks and delivery through a range of passenger solutions. It also identified that bus operators should be Statutory Consultees in the planning process to help better plan new developments which we would support.

6.0 Better Located Development

At the heart of any approach to rural connectivity is the need to recognise, often in larger rural counties new developments are taking place in completely unsustainable locations in terms of transport, and that, as a result of being in the wrong place, these locations are prone to increased social isolation, lack of access to services, poor connectivity and ultimately poor bus services if at all. We are ultimately forcing people to use the private car from the word "go". Development Plans and Development Control functions need to focus new development on locations that can accommodate sustainable transport and financially viable bus services, rather than in locations with least local resistance.

We have been working with the Foundation for Integrated Transport, RAC foundation and others, to look at various case studies to look at the delivery of new housing with a desire to learn lessons and look at how new developments can be more accessible to all modes - not just the car, and of course better access to bus services.

The report, *"Transport for New Homes"* found that, amongst other things new homes – many of which are in rural county areas - were not properly connected for pedestrians, cyclists or buses. The report has found that planners work with developers *"within the red line"* of the planning application and the connection of transport to the site was often excluded from consideration. This has led to new "bubbles" of development being isolated.

The period of austerity has led to a reduction in specialist Highways and Public Transport experts within Local Authorities. This means that often, in pursuit of achieving pure housing numbers, transport issues – and in particular local transport solutions are not considered in the planning process. Indeed, they are not included in Site Specific Developer contributions, are a very poor relation in CIL 123 lists and rarely attract pump priming for local bus services. Such services need a "good run in" to be able to be commercially viable once development is built out, thus removing the potential of a financial burden for local authorities in future years.

This all leads to requests to retro-fit developments, when roads are not wide enough, the layout does not allow for bus operation on sites which are not commercially viable and cannot attract public subsidy – bringing residents on these distant estates into transport poverty. Even worse - small, unrealistic contributions allow for only unsuitable bus services that have little or no chance of survival after their seed funding ends.

In 2018 MHCKG noted that *"At a time when developer contributions nationally have increased from £5,064m in real terms to £6,007m between 2005-2006 & 2016-2017, transport and travel contributions arising from development have declined by 70% from £467m to £132m over the same period"* (*"The Incidence, Value and Delivery of Planning Obligations and Community Infrastructure Levy in England in 2016-17"*). We have severe concerns that local, deliverable transport schemes are not delivered or prioritised as big ticket, slowly delivered, complex schemes are delivered at the expense of local transport solutions.

Local mobility hubs are conceptualised as district centre type locations where a range of mobility options and services are offered in the same place. This includes combining provision of public transport interchange, car club vehicles, high quality cycle facilities and cycle parking, taxi rank, EV charging points, and flexible space for business use (e.g. cafes, "pop up" shops etc) all linked together by improved quality public realm and include:-

- Access to shared bikes/ e-bikes
- Hub/ interchange point for DRT services and micro-consolidation points; and
- Provision of click & collect facilities.

This could be as new provision within existing settlements but also through new developments. Development Plans and Development Control functions need to focus new development on locations that can accommodate sustainable transport and financially viable bus services, rather than in locations with least local resistance.

7.0 The Need for Bus Infrastructure as Part of New Development

In Accordance with the above policy we are keen that development should promote quality development and quality bus provision that is attractive to users with improved access to main corridors, less deviations off route and reduces potential delays with carriageway widths within new development a minimum of 6.5 metres. Moreover it is essential that if developments are to be made sustainable, public transport services are provided and funded from very early in the development to create transportation habits.

The planning of development sites should consider the walking distance to bus stops and the corresponding bus catchment areas. This affects the distance between adjacent bus routes and hence the street layout as a whole. CIHT guidance "*Buses in Urban Developments*" highlights the distances to bus routes from proposed development. This is set out in figure 4 below.

Situation	Maximum walking distance
Core bus corridors with two or more high-frequency services	500 metres
Single high-frequency routes (every 12 minutes or better)	400 metres
Less frequent routes	300 metres
Town/city centres	250 metres

Figure 4: Recommended Walking Distances to Bus Routes (Source CIHT Buses in Urban Developments, 2018)

For sites to accommodate buses we would advise that the general layout should be as highlighted in figure 5.

In terms of infrastructure we would like to ensure that there are high quality bus stops with superior facilities that might be expected on a *high quality* bus corridor. A typical stop should be provided with:-

- Good bus stop design including real time passenger information display, printed timetable and service information, local map and way finding;
- High visibility bus stop flag and pole with appropriate and consistent branding;
- Superior passenger waiting facilities including shelter with seating and litter bin. The shelter size should reflect typical peak demand – the minimum recommended length based on TfL standards for their Landmark shelter is 3 panels, each of 1.3m (i.e. 3.9m) with a 1.3m full width roof. At the design stage a minimum footprint of approximately 4m by 1.5m should therefore be considered;
- Strong pedestrian links to the leisure attractions on the key;
- An enhanced maintenance regime to maintain the quality feel of infrastructure investment;
- A wider footway to reduce pedestrian congestion around the bus stop waiting area. DfT inclusive mobility guidance recommends 4.5 to 5m, with an absolute minimum of 3m. In a city centre location where pedestrian flows are high the recommended width of around 4.7m should be adopted as the basis for good design;
- Sufficient pedestrian movement space adjacent to aid unobstructed movement of high pedestrian flows;
- A higher kerb to reduce the step height between the bus and the footway, minimum 125mm;
- Higher quality footway and carriageway paving materials;
- A clearly defined carriageway area – a bus stop cage marking of sufficient length to enable buses access close to the kerb. Minimum of 15m per bus if unobstructed (to cater for maximum likely vehicle lengths); where parking regularly occurs on entry to the stop a taper length of 13m should be provided, and to protect the exit there should be an exit taper of 9m;
- An "at any time" 24 hour Monday to Sunday bus stop clearway with an appropriate enforcement regime.

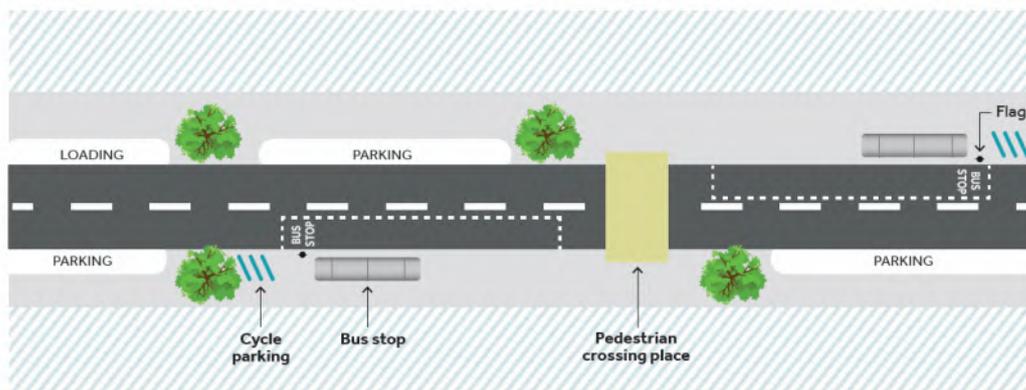


Figure 5 – Example of Bus Stop Layout (Source CIHT Buses in Urban Developments, 2018)

We would therefore propose that the Local Plan includes a policy which states that masterplanning and planning applications should promote quality development and quality bus provision that is attractive to users with improved access to main corridors, less deviations off route and which reduces potential delays, with carriageway widths within new development a minimum of 6.5 metres where appropriate. In addition high quality bus infrastructure should be provided as part of the development to enable modal shift away from the private car and promote sustainable transport modes.

8.0 Overall Plan Strategy & Transport Evidence Base

Please see the joint response on these matters submitted by Stagecoach and Go South Coast.

9.0 Housing Selections

Salisbury

SB1: Scale of Growth & Brownfield Target & SB2: Priorities

The approach to housing in the Salisbury appears to be that there is a realisation to a large extent that with a few, limited exceptions that there is now a need in the new planning period to look beyond the immediate edge of Salisbury to meet needs arising in the City. We note the Planning for Salisbury Paper which states "*...there appear to be serious constraints to the further outward expansion of the city. Compared to the amount of land that needs to be planned for, the pool of potential development sites is limited. Preferred development locations at Salisbury are currently based on three new sites which are shaped by the landscape and access to public transport*" – an approach for these sites with which we broadly fully concur and which between them meet 2/3rds of the lower housing requirement for the Salisbury HMA.

Considering these constraints on the City, **we therefore consider considerably more housing should be provided in a manner that enables sustainable transport within the city and then at settlements with good public transport accessibility. This approach should be in sequential manner in terms of the identified sites 1, 6, & 7, followed by higher density housing in the city centre to ensure the vitality and viability of the centre – and then Amesbury to meet Salisbury's housing need.** One only needs to look down the road to Southampton city centre which between 2001 and now has become the most high density and populated ward in the city which has enabled, covid aside, a burgeoning evening economy and reaped the benefits of reverse commuting to sweat the transport asset.

This is why we fully support the approach of delivering opportunity sites such as Brown Street and part closure of Salt Lane Car Parks for redevelopment, primarily as housing but would also point out that the Maltings Redevelopment provides the opportunity for additional and higher density housing the city centre. The brownfield potential is therefore not fully explored and would **propose that the LPA consider a brownfield site assessment with a view to increased urban living in Salisbury with its connectivity and not remote new developments.** We consider this, in line with a revised approach to Amesbury could significantly assist to meet the housing needs of South Wiltshire.

We support the Salisbury Central Area Framework which would need to be considered as part of any Local Plan Proposals. Perhaps, unsurprisingly, we support the concept of developing people friendly streets which promote

access by sustainable transport including walking, cycling and public transport. We also support the other objectives of improving open space and the environment, creating vibrancy, bringing out the qualities and developing the character of the city – which in recent years has been lost and has contributed towards reduced footfall in the city centre. It is essential that these elements come together, with more city centre housing, to promote inward investment and enable a vibrant daytime and night-time economy that also promotes a rich and diverse tourism offer in the city.

Whilst it is good that the document notes that *"the city is well served by inter urban bus routes with regular services to Amesbury and West Wiltshire and a good high frequency bus network connecting suburbs to the city centre"* with *"five park and ride sites with frequent services (running late on four out of five sites)"* (p22). It is disappointing to see that the design principles (p9) highlight the need for *"networks of cycleways and rights of ways within new areas"* and there is no mention of the need for these sites (certainly in the case of sites 6 & 7) to firstly enable bus access per se but also that the roads within the development to be able to accommodate buses. **We would therefore propose that policies in relation to these sites include reference to the need to allow for bus access, traffic signal priority and also bus infrastructure improvements in terms of bus shelters and stops as set out at section 7.0 of this response funded through the development.**

The need to improve wayfinding and city centre legibility needs to be matched with more legible public transport networks and interchanges which make it better for residents and visitors alike. New developments in the city centre should financially contribute to these facilities.

The Need for Additional Priorities in the City Centre beyond Housing Need

Whilst we note the current plans for the Maltings and Central Car Park, we do consider the opportunity should be taken during the Local Plan allocations process to facilitate electric modes of transport as part of this redevelopment through a green charging hub - including a new bus depot which could include electric charging for the city's bus fleet. In January 2020 three new electric buses entered service in Salisbury to test the ability of electric to meet the needs of the urban and inter-urban bus market.

Whilst these trials are early days it is clear that the transfer of the internal combustion engine to electric and hydrogen is the way forward for powering transport, including buses in the medium to longer term. The current bus depot site on Castle Street does not lend itself to mass conversion to charging for electric due to overall layout, supply and spacing requirements. Accordingly to support the objectives of transfer of the bus fleet a new bus depot and charging facility needs to be developed in the city centre.

Operationally the location of the existing bus depot is optimal and the efficiency of the location supports a lower cost base for a small city network which could not be supported further out of the city centre. Therefore any replacement facility would need to be located very close to the existing operational base that could accommodate a bus depot facility, whilst at the same time releasing city centre housing land.

The existing bus depot site in Castle Street is now almost entirely surrounded by residential land uses as well as being allocated itself in successive Local Plans for redevelopment for residential use and has not come forward as housing land due to the lack of local nearby replacement depot facilities. The overall city network could not be supported from edge of city or out of city sites and therefore this process presents the ability to deliver such an integrated charging hub which includes a bus depot facility equipped for electric charging – or for the opportunity to be missed for a generation.

Transport Key Features, Constraints and Bus Service Reliability

The Salisbury City Centre Action Plan states the city should *"prioritise places and spaces for pedestrians, cyclists and public transport over private cars. Promoting sustainable connectivity"* on which we naturally concur and would like to see incorporated in the appropriate policies of the Local Plan.

We agree with the concept of developing people friendly streets which promote access by sustainable transport including walking, cycling and public transport. One impact of People friendly streets during its brief implementation phase was that it started to show significant improvements in bus journey times through improved flow of buses through junctions and networks which would have, in turn led to more people using buses, reducing the impact of the car on our historic city.

The A36 and the congestion along it means rat-running occurs in the city, we note that the A36 signals have been transferred from WC to HE that there is the need for a clear vision for the A36 through the city – as without this it is hard to see how this rat running will be dealt with. To this end we would like to work with Wiltshire Council and

Highways England on making bus priority happen across the A36 junctions so that time savings are enhanced. We have already successfully trialled such a system in Southampton and are currently trialling across Bournemouth and Poole.

Measures to encourage modal switch from car to bus can be transformative. Bus priority measures can deliver 75% fewer emissions per bus passenger km than for car passengers. Bus priority is not only a successful measure to improve air quality but it also effectively tackles congestion, with one bus moving 10 times as many people as a car (based on average vehicle occupancy for both).

Bus priority measures also enable more effective management of road space and speed up journeys offering high value for the taxpayer. Effective investment in bus infrastructure can generate up to £7 of net economic benefit for every £1 invested (*Source: Improving Air Quality In Towns and Cities- why buses are an integral part of the solution, Professor David Begg, 2017*).

For these reasons, along with the identified peak hour delays and lack of bus priority noted in the transport constraints, new developments within the city development boundary (but not the city centre) should make a contribution to the Salisbury Transport Plan with the specific aim of introducing Traffic Signal Priority for buses alongside physical measures to improve journey times across the city.

**SB3: Appropriateness of Sites &
SB4: Aspects to Consider**

Please see response to Salisbury sites 1, 6 & 7.

Site 1: North East of Old Sarum

We **SUPPORT** the allocation of this site with **SUGESTED POLICY WORDING**.

This site is part of an ever expanding encroachment into the countryside and Longhedge. However, this site at Portway is much further away from the developments being rolled out north of the Beehive Park and Ride Site. The site proposed is 1.2km from the Park and Ride site and the higher frequency inter urban services along the A345. The site close to the X67 along Portway but this operates once in the morning and twice in the afternoons and is not ideal to access this site.

PR11/R11 runs close by along Sherborne Drive and we would only support development at this site if the site could accommodate the extension of the PR11 to this location – with the cost of the provision met by the developer for a period of time until the route can be established.

Opportunities to serve this new site and maintain or improve services to the existing nearby sites would be enhanced by the provision of a bus-friendly through link between Portway and the A345 via the new development and the adjacent existing Longhedge development. The ability to develop PR11 into a route that serves Old Sarum, Longhedge and the new site would offer significant benefits provided through such a link.

**Site 6: North of Downton Road &
Site 7: South of Downton Road**

We **SUPPORT** the allocation of these sites with **SUGESTED POLICY WORDING**.

We support the allocation of these sites as they are close to existing inter-urban and park and ride bus services although we would like to see any policy wording reflect the need to access the sites by bus, rather than being close to the park and ride. **As the Britford Park and Ride is at the end of the route it would make sense for any service to take a circular or "lollypop" routing to better enable bus access to and through both sites.**

From Downton Road we would suggest that the route could divert through the site north of Downton Road (site 6) before crossing into the Britford Park and Ride site, which with some engineering amendments could then also link into the site south of Downton Road and connections through to the General Hospital or Odstock Road to improve connectivity. This would also facilitate the use of the Park and Ride for use as a site also for Salisbury District Hospital as well as Salisbury City Centre. The plans provided as part of consultation are not very clear in terms of access to these sites but certainly this could be provided by a modal filter in favour of buses to prevent rat-running traffic and enable overall improved connectivity as a clear planning gain.

We note the provision for a potential emergency gate to the general hospital at the southern edge of site 7 into SDH and therefore this would provide the perfect opportunity for improved bus connectivity to a fast developing site that needs to reduce overall parking provision in favour of healthcare which this site enables. **The movement plan is rather poor in relation to this site and it should clearly include bus accessible routings through sites 6 and 7 incorporating the park and ride as well as access for buses through a bus gate to the District Hospital and/or Odstock Road.**

Naturally there are levels differences through the park and ride site but also through to site 7 in particular but these could be overcome with good design.

Amesbury

AM3: Pool of Development Sites & Additional Sites for Consideration

The bus corridor along the A345 between Amesbury and Salisbury benefits from one of the most intense levels of public transport provision of anywhere in the County – rural or urban. In fact this has become one of the most frequent inter-urban bus service corridors in Southern England.

These services commence in Salisbury, then fan out through Amesbury and to the north, to provide regular links across the area and the wider County and include:

- Salisbury Reds X4 to Durrington and Larkhill Camp;
- Salisbury Reds X5 to Durrington, Pewsey, Marlborough and Swindon;
- Stagecoach South/Salisbury Reds jointly operated Activ8 to Bulford, Tidworth, Ludgershall and Andover.

It is therefore regrettable that the transport key features suggest a new station at Porton, which unlike Devizes and Wilton is not being progressed and completely negates the opportunities provided by buses at this location. This needs to be reflected in any emerging policies as well as developments at these locations enabling multi modal hubs, contributing to service improvements and enhancements as well as infrastructure and highway layout issues discussed in section 7.0 of this response.

Amesbury and the A345 route in particular, presents a clear opportunity to meet the housing needs of this part of Wiltshire, which closely relates to both Salisbury and the wider Salisbury Plain, in such a way that the need to depend on the private car could most credibly be minimised. The strength of this relationship with both Salisbury and the wider hinterland is readily apparent from the manner in which these frequent commercial bus services have developed steadily over recent years.

Considering the approach in the Salisbury HMA including Amesbury and the southern part of the Plain, we note that the Council already recognises that clear physical and environmental constraints actually close the door on the current plan strategy that has sought to concentrate development around Salisbury, as urban extensions.

The need therefore, to look beyond the immediate edge of Salisbury to meet needs arising in the City means that a new approach is therefore begged: one that seeks to identify relatively unconstrained but highly sustainable locations away from the City, but close enough that avoid elevating the energy and carbon intensity of mobility provision as far as possible, while ensuring that sustainable modes can play at least as great a role in meeting travel needs as they would in the City itself. Clearly, this demands identification of options that offer potentially very high levels of local self-containment, relate directly to existing and future employment growth; while also maximising the potential to use public transport for longer-distance journeys. There is also potential to connect these sites to a potential new Wilton Junction station though a project currently subject to a "Restoring your Railways" bid and initiative on which both Salisbury Reds and Wiltshire Council are partners.

We are working with developers on the western side of the A345, south of Stockport Avenue and have provided a letter of support – together with Stagecoach regarding these proposals and would recommend the potential for this to be included in the plan for the reasons set out in this section and would welcome further discussions on this which we consider would be more sustainable than sites 1 or 2 for example.

Accordingly we consider that there is an opportunity for Amesbury to become a more sustainable development location to play a role in accommodating the additional housing requirement for Salisbury that cannot be met from the city centre itself, with high frequency and high quality public transport connectivity as well as these developments being able to enable bus access and service enhancements.

The journey time, from South Amesbury in particular, to the city centre by bus would be very comparable with those on offer at the outer end of the City's own network. Counter-intuitively in some cases, although the site is about 10km from the City centre, it would actually be slightly quicker than some existing recently-built developments on the edge of the city.

Site 1: Land North of London Road (SHELAA Ref 3379)

We **SUPPORT** this site being allocated with **RESERVATIONS**.

This site is located relatively close to employment allocations and accordingly may be suitable in terms of containment levels but overall is quite small and therefore less attractive than the larger site to the south of Amesbury. Lying between the A303 and the main settlement access means bus services are relatively close to the site but would need to be accessed from London Road. **Any policy in respect of this site would need to address suitable walking access from the site to London Road as well as improved bus shelter stops etc. as set out in section 7.0 of our response.**

Site 2: Land to Rear of Countess Road (SHELAA Ref 3186)

We **OBJECT** to the allocation of this site.

We concur development of this site would be encroachment into urban countryside as it is north of the A303 and therefore any Amesbury development needs to be south of the A303 in transport terms. Sites to the south of Amesbury abutting the A345 would be more sustainable in this respect which can provide larger, better connected settlements. The ability of this site to be self-contained is unlikely due to its physical separation by the A303 and will create additional crossing movements across the SRN. Whilst it is near existing bus services between Amesbury Salisbury and Swindon it is much less attractive in terms of potential modal shift than other Amesbury sites.

Site 3: Land Adjacent to Stockport Road and Land at Stock Bottom (SHELAA Ref S1054 & S1010)

We **SUPPORT** the allocation of this site with **SUGGESTED POLICY WORDING**.

The site is passed directly by Activ8, X4 and X5 five times an hour, along its longest side, much of the site would be well within 400m of a service without diversion depending on land use, and the provision of appropriate new stops on the A345.

However the scope to create an efficient diversion into a larger development is likely to exist subject to the movement and access strategy for the site achieving a seamless movement into the development and out of it again. If achieved this is likely to bring a very large proportion of the development within sufficiently convenient walking distance to start to present the necessary relevant choice for local and longer distance journeys especially to Salisbury.

There is still more interesting and highly unusual potential to create a local inter-modal facility near Stock Bottom at the south east corner of the site, which would also allow the site to be served by up to 5 buses per hour to Salisbury. Readily accessible by walking and cycling as well as cars from a local hinterland, including the existing Archers Gate development to the east, the objective would be to consolidate personal vehicle journeys onto public transport towards Salisbury at the point where both service frequency was maximised, alongside a generalised journey time that is most likely to be attractive and competitive with driving. The potential positive impacts of this on the carbon intensity of travel not just from this site, but from the wider existing and committed development in the Amesbury and Boscombe Down area, could be very material.

From first principles, it also looks technically feasible to introduce an additional bus per hour between Salisbury and Amesbury via the site within a single vehicle operating resource, providing the potential for a more regularly spaced service at 6 BPH; about every 10 minutes. This exceeds the frequencies available at many of the existing established Park and Ride sites on the edge of Salisbury, which have shown their relevance over many years.

When considering the existing bus network in Salisbury City, it should be pointed out that the journey time from this point to the city centre by bus would be very comparable with those on offer at the outer end of the City's own network.

As the Council looks at how to address a clear challenge in meeting the housing needs of the City of Salisbury whilst reducing car dependency and carbon intensity, we would point to that this site as well as potentially the site to the west of the A345 could both represent an unusual opportunity to achieve this while avoiding much more sensitive and more constrained locations that while geographically closer to the City, may not actually be as sustainable in the round.

We would therefore propose that any policy includes the provision of a mobility hub in this location for buses to coalesce and enable a better modal share for sustainable transport from this location as well as the provision, if required to support additional bus frequency as set out above. The Policy also should highlight the need, depending on layout and mobility hub location the requirement for roads to be accessible for buses as set out in section 7.0 of our response.

Tidworth & Ludgershall

TL5: Pool of Development sites

We note and support the aim of the regeneration of Station Road in Tidworth Town Centre

Tidworth and Ludgershall are mainly served by the Activ8 service connecting Andover and Salisbury jointly operated by Stagecoach and Salisbury Reds. In addition, service 80 provides a service every 90 minutes between these settlements and Swindon operated by Stagecoach and more infrequently the 66/67/X67 operated by Stagecoach to Salisbury. The principle service however is the Activ8 which operates a half hourly daytime frequency. Indeed, we are supportive of the proposition of the transport key features which notes that whilst there is no rail station, these settlements do benefit from the Activ8 bus service.

Whilst we support the notion of contributions to support safe walking routes we would also point to the need to these development to also contribute to improved bus infrastructure in terms of bus stops and shelters as referred to at section 7.0 of our representation.

**Site 1: Land East of Crawlboys Round (SHELAA site 3498) &
Site 2: Land North of A342 (SHELAA site 3468) &
Site 3: Land North-East of A342 (SHELAA site 2067) &
Site 6: Land North of Wellington Academy (SHELAA site 2062)**

We **OBJECT** to the allocation of these sites.

The sites are distant from any public transport network compared to other sites taken forward – sites 2, 3 and 6 are in particular very small in nature and whilst not a significant distance away from bus routes, seem to have less in terms of quantum of development and therefore we would support other sites going forward.

**Site 4: Land at Empress Way (SHELAA site 555) &
Site 5: South West Ludgershall (SHELAA sites 2064, 2065, 2066) &
Site 7: Land North of A3026 (SHELAA Site 2063) &
Site 8: Land West of Pennings Road (SHELAA site 3110) &
Site 9: North-West Tidworth (SHELAA site 3111) &
Site 10: Land South of Bulford Road (SHELAA site 3037) &
Site 11: Land South of the Mall (SHELAA site 3086)**

We **SUPPORT** the allocation of these sites with **SUGGESTED POLICY WORDING**.

Sites 4 and 5 in particular are well suited to the quantum of development that could help a viable bus service operation, and to a much lesser extent this applies to site 7. However with the centre of these sites lying anywhere between 780m and 1.12km from existing bus services it will be important to examine how buses can access the site whilst maintaining also current routing patronage.

We agree sites 4 & 5 should be treated as one allocation and would like the **planning authority to include in any policy a noting that there will be a need to ensure bus access to and through the site as well as ensuring service roads are wide enough to accommodate buses as set out elsewhere in our response. We would also reserve the right to secure developer contributions were additional resources required to serve the site which we also consider should be included in any Local Plan allocations.** It will be essential however, to maintain access to Ludgershall town centre.

We would support any proposed allocations at sites 8, 9, 10 and 11 as they are very close to the existing settlement, rounding it off and are very close to the existing Activ8 loop and would therefore suggest that the **planning authority in any policy in relation to the sites makes provision for improved bus infrastructure with respect to bus stops and shelters**, the standards for which are highlighted in section 7.0 of this response.

Marlborough

MB3: Pool of Development Sites & MB4: The Most Appropriate Land to build on

We note that the settlement plan highlights the key transport features including that "*Marlborough is well served by bus route with regular services to Swindon, Pewsey and Salisbury and less frequent services to Kennet Valley settlements, Calne and Tidworth*".

The infrequent services referred to above occur once or twice daily and are not suitable for commuters or shift workers and to propose that this is a suitable transport option to justify development on this basis is sub optimal at best. These services include services operated by Salisbury Reds including the 19 to Wilton once per day and X20 to Newbury once per week as well as services of our sister operator Swindon Bus including the 20 and 22 to Hungerford and 42 to Calne operating thrice, once and five times per day respectively. In addition to this eclectic offering, the X76 to Bath operates once per day. Stagecoach operate to Swindon and Hungerford on the 48/48a twice and three times a day respectively and 80 to Swindon slightly more regularly at six journeys although with no Sunday service.

Services to Swindon, Pewsey and Salisbury are hourly via the X5 during the daytime with no evening service – again, to suggest this a positive public transport environment in itself as set out in the paper is misleading.

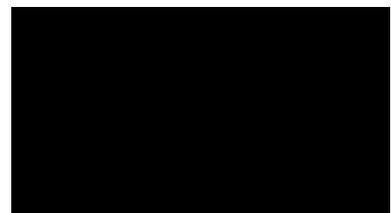
The four strategic sites, whilst they may offer only slightly closer proximity to local town centre circular routes are roughly 400m, 530m, 700m and 700m from any realistic public transport proposition whereas the CIHT guidance suggests for any potential sites to be within between 250-300 metres. Even using the outdated DfT rule of 400m would suggest these sites are not compliant. Accordingly we do not consider the pool of development sites to be suitable in transport terms.

**Site 1: Land at Chopping Knife Lane (SHELAA sites 660 & 661) &
Site 2: Land adjacent to Salisbury Road (SHELAA sites MA1) &
Site 3: Land at College Roads (SHELAA sites 3326 & 3622) &
Site 4: Land at Barton Dean (SHELAA Sites 565, 3626a, 3626b)**

We **OBJECT** to the allocation of these sites.

The sites are distant from any public transport network and is also located outside the development boundary.

We therefore **OBJECT** to these proposed allocations as they are not accessible by public transport and the development is therefore unsustainable. This is compounded in that the proposed sites are outside the development boundary and very off-track for existing bus services. Accordingly we would suggest sites in settlements that can accommodate a better level of sustainable transport provision would be a more preferable approach with smaller windfall sites only being accommodated in Marlborough.



STRAT193

Wiltshire Local Plan Review Representation

Land to the south of Knighton Road,
Broad Chalke, Wiltshire

Prepared by Savills on behalf of [REDACTED]

March 2021

Contents

1.	Introduction	1
2.	Response to the Emerging Spatial Strategy	2
3.	Response to Empowering Rural Communities	6
4.	Conclusion	9

1. Introduction

- 1.1. Savills are instructed on behalf of our client [REDACTED] the owner of Knighton Manor and areas of land to the south and east of Broad Chalke, to respond to the Wiltshire Local Plan Review Regulation 18 Consultation. Having considered the Local Plan Review consultation pages we set out below specific representations to the 'Emerging Spatial Strategy' and 'Empowering Rural Communities' papers and redraw attention to our client's land to the eastern end of Knighton Road (Site Location below), Broad Chalke, previously submitted to both the Broad Chalke Neighbourhood Plan and Wiltshire Council's call for sites process. The site measures approximately 0.5 hectares.



Figure 1: Site Location: Source Dorset Explorer

- 1.2. The site is presented as a suitable additional residential site for inclusion as an allocation within the Local Plan Review. If the site were accepted as an allocation, we consider that the site has capacity for approximately 10 new dwellings. The site could be extended further if it was considered appropriate to secure a slightly larger allocation. The development of this land would follow the existing pattern of development and character in this part of Broad Chalke which is predominantly residential ribbon development extending along the northern and southern edges of Knighton Road.

2. Response to the Emerging Spatial Strategy

Local Plan Period

- 2.1. The Wiltshire Local Plan Review Consultation sets out that Wiltshire Council is reviewing the Wiltshire Core Strategy (2006-2026) adopted in January 2015. It indicates that the review of the Core Strategy will cover how growth will be distributed around the county and potential locations for development amongst other topics. The review proposes to extend the period to which the plan relates to 2036 with the new plan period covering 2016-2036.
- 2.2. The National Planning Policy Framework (NPPF) sets out at paragraph 1 that “The National planning Policy Framework sets out the Government’s planning policies for England and how these should be applied. It provides a framework within which locally-prepared plans for housing and other development can be produced.” It is clear at paragraph 2 of the Framework that it must be taken into account when preparing the development plan.
- 2.3. The Framework sets out that the planning system should be genuinely plan led and that succinct and up-to-date plans should provide a positive vision for the future of each area. It then requires strategic policies which include those that make sufficient provisions for housing to cover an appropriate period. Paragraph 22 of the Framework is explicit in stating that “Strategic policies should look ahead over a **minimum 15 year period from adoption**, to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure. [bold and underline our emphasis]”
- 2.4. Wiltshire Council’s Local Development Scheme (LDS) published in July 2020 sets out the timescales for the preparation and adoption of Development Plan Documents. The LDS indicates that the Wiltshire Local Plan Review is scheduled for submission to the Secretary of State for examination at the end of 2022 with an anticipated adoption in 2023.
- 2.5. Taking account the requirement contained within the Framework that strategic policies in the development plan (which includes those for housing) should look ahead over a minimum 15 year period from adoption, the Local Plan review should be looking ahead to at least 2038 based upon an anticipated adoption year of 2023. This would be consistent with the approach currently being adopted by neighbouring authority areas in Dorset and South Gloucestershire. The current proposed plan period of 2016 to 2036 would fall two years short of the minimum requirement in the Framework.

- 2.6. Whilst the Council is currently undertaking a review of an existing Local Plan, rather than a new plan, paragraphs 31 to 33 of the Framework deal specifically with preparing and reviewing Local Plans. There is no reference in the Framework to Local Plan Reviews being subject to shorter plan period requirements post adoption and therefore the Local Plan Review should be considering the extension of the plan period to 2038 as a minimum.
- 2.7. To build in further flexibility to account for potential delays to the Local Plan Review programme to adoption which may result in the plan being adopted post 2023, we consider that the Council should also consider extending the plan period out further to 2040. There is evidence of similar approaches being taken in nearby authority areas at Test Valley, Mendip and the Vale of White Horse.
- 2.8. On this basis, we do not support the proposed plan period for the Local Plan Review of 2016-2036 and consider that proceeding with the plan period as proposed would fail to meet the 'positively prepared' and 'consistent with national policy' tests of soundness set out under paragraph 35 of the Framework. We consider that the plan period of the local plan review should be amended to cover the period of 2018-2038 at the very least to take account of the anticipated adoption year of 2023 and to be more robust, to plan for growth until 2040 to ensure that it stands up to the tests of soundness during examination.

Housing Requirement

- 2.9. The Wiltshire Local Plan Review emerging spatial strategy sets out at paragraph 1.1 that forecasts predict Wiltshire will need between 40,840 and 45,630 new homes over the plan period of 2016 to 2036. The lower figure is a minimum based upon the Government's standard housing methodology whilst the higher figure is based upon a Local Housing Need Assessment (LHNA) which includes new homes needed taking account of longer term economic forecasts and migration trends.
- 2.10. The presumption in favour of sustainable development set out at para 11 of the Framework tells us that for plan making that "strategic policies should, as a minimum, provide for objectively assessed needs for housing..." Given the outcomes of the LHNA and its evidenced position, we support the approach of planning for the higher level of housing and the principle of building in contingency to meet the housing requirements of the area rather than simply meeting the minimum standard methodology requirement.
- 2.11. Paragraph 23 of the Framework indicates that "Strategic policies should provide a clear strategy for bringing sufficient land forward, and at a sufficient rate, to address objectively assessed needs over the plan period, in line with the presumption in favour of sustainable development. This should include planning for and allocating sufficient sites to deliver the strategic priorities of the area...."
- 2.12. The Local Plan Review includes bringing new land forward through allocations but it is important to consider whether sufficient land is being identified to meet the full requirements over the plan period. The Wiltshire Local Plan review explains how it has calculated the additional homes needed at paragraphs 3.7 to 3.16 of the emerging spatial strategy.

- 2.13. A residual requirement is identified for each of the principal settlements and market towns and the rural areas of the remaining housing market area to inform the amount of land needed to meet future housing requirements. Paragraph 3.16 explains that the residual requirement represents the homes that need to be planned for once new homes built, homes with planning permission and other commitments have been removed.
- 2.14. We consider that the Local Plan Review's approach to identifying the residual requirement is unsound and we object to the Council's approach based upon the current inadequate plan period. This has significant implications upon the Council's strategy for bringing forward sufficient land to address the assessed need by deflating the actual requirement through inappropriate reliance on past completions.
- 2.15. The current plan review includes a reliance on completions during the years 2016-2018, a period where high housing delivery rates were achieved. By including the completion figures from these years within the Local Plan Review, the Council is depressing the residual requirements across the plan area. This subsequently reduces the need to find additional new site allocations to meet the actual assessed need of the plan area over an appropriate plan period. It is therefore failing the test of paragraph 23 of the Framework to provide a clear strategy to bring sufficient land forward to address the assessed needs of the area.
- 2.16. Looking at this issue in more detail, the current Local Plan targets indicate a requirement to deliver 2,100 homes per annum across the plan area. The data contained within Table 1 of Wiltshire Council's Housing Land Supply Statement dated December 2020 indicates that during the years 2016/17 and 2017/18, housing delivery in Wiltshire reached 2,690 and 2,428 dwellings respectively. This indicates that during the years currently included in the Local Plan Review period that significant over-delivery (+918 homes) was experienced and that some 5,118 homes are erroneously being included in the Local Plan Review to offset against the residual housing requirement.
- 2.17. If the Local Plan Review period were to be altered appropriately to include a 15-year post adoption timescale as a minimum it would run from 2018-2038. The consequences of this necessary change is that the Local Plan Review is currently circa 5,000 homes short in terms of bringing forward sufficient land to meet the needs of the plan area over the future plan period. If the plan period were to be extended further to 2040 as we would advocate to ensure robustness, the current Local Plan Review is some 9,200 homes short of meeting the required need.
- 2.18. We therefore object to the Council's emerging spatial strategy on grounds that it does not provide sufficient land to meet the assessed needs of the area and is therefore unsound in that it has not been positively prepared, is not justified and is not consistent with national policy.

Salisbury Housing Market Area

- 2.19. The village of Broad Chalke is located within the Salisbury Housing Market Area (HMA). Looking at the issue of requirement in the Salisbury HMA in more detail as we did for the Local Plan area as a whole, the current Core Strategy targets indicate a requirement to deliver 12,340 homes between 2006-2026, a total of 617 homes per annum. The overall housing requirement in the Salisbury HMA for the current proposed Local Plan Review period is 10,970 homes between 2016-2036, a total of 548 homes per annum.
- 2.20. The data contained within Table 1 of Wiltshire Council's Housing Land Supply Statement dated December 2020 indicates that during the years 2016/17 and 2017/18, housing delivery in the Salisbury HMA reached 794 and 676 dwellings respectively. This indicates that during the years currently included in the Local Plan Review period that over-delivery (+236 homes) was experienced and that some 1,470 homes are erroneously being included in the Local Plan Review to offset against the residual housing requirement for the Salisbury HMA. Removing the reliance on these past completions from the figures would result in the total residual requirement in the Salisbury HMA increasing from 2655 to 4125 new homes.
- 2.21. These figures are taken as a whole in the HMA and must be accounted for in the Local Plan Review regardless of which development strategy is selected for the wider Salisbury HMA. Based upon the inadequacies of the plan period, inappropriate reliance on past completions during the period 2016-2018, more housing allocations are needed across the Salisbury HMA to ensure that the Plan Review is suitably robust in addressing the requirements of Paragraph 23 of the Framework and meeting the tests of soundness. Some of this requirement can reasonably be met through small to medium sized allocations in the more sustainable rural communities.

3. Response to Empowering Rural Communities

New Core Policy: Housing Requirements for Neighbourhood Area Designations in the Rural Areas

- 3.1. The Local Plan Review consultation paper titled 'Empowering Rural Communities' sets out the Council's intended strategy to deliver housing across the rural parts of the plan area. The rural area consists of existing Local Service Centres, Larger Villages and Smaller Villages. Broad Chalke is currently identified as a larger village in the Wiltshire Core Strategy and would remain as such under the Wiltshire Local Plan Review.
- 3.2. The Empowering Rural Communities paper sets out at paragraphs 7 – 9 the need and importance of the more sustainable rural settlements to accommodate some growth to contribute towards meeting the plan area housing requirements but also to ensure the longer term vitality of sustainable rural communities.
- 3.3. *"7. Most services upon which communities rely are found in rural settlements. Large Villages and Local Service Centres are rural settlements designated in the current plan that contain services and facilities that also serve a much wider local catchment. They support many jobs and businesses as well as often providing local goods and services vital, of course, to those sections of the community unable to travel easily.*
- 3.4. *8. It is vital that planning supports the role of these settlements; that they grow in ways that sustain them. This means they should continue to accommodate new homes both on a scale that matches their size and importance and in ways that best meet each community's needs.*
- 3.5. *9. The role of the Local Plan Review is to set an appropriate scale of housing growth for Large Villages and Local Service Centres over the plan period (2016-2036). Experience has shown that some villages have been challenged by disproportionate growth, whilst others have seen relatively little in recent years. By setting out a scale of development, there will be certainty for local communities. Neighbourhood Planning will be able to allocate the land they want to see built on rather than feel under threat from market pressure. The Council is suggesting those scales of housing growth and will finalise them responding to comments received."*

- 3.6. The Local Plan Review indicates that at the Local Service Centres and in the Larger Villages, site allocations will generally be carried out by Neighbourhood Plans. We support the requirement in the spatial strategy to facilitate some distribution of the Local Plan housing requirement to the more sustainable rural communities in the Housing Market Areas and acknowledge the Council's position set out at paragraph 10 that *"This is not just about securing affordable dwellings but also about retaining a good range and mix of house types in the local stock."* We are concerned however as to whether Neighbourhood Planning can truly deliver the scale of housing requirements set out in the Local Plan and believe that the Council should consider making some allocations in the Local Service Centres and Larger Villages through the Local Plan.
- 3.7. Table 2.5 of Empowering Rural Communities provides the indicative housing requirements for the larger villages in the Salisbury HMA and indicates that Broad Chalke's baseline indicative housing requirement over 2016-2036 is 25 dwellings or 1.3 dwellings per annum. It then suggests that 13 dwellings are already accounted for through completions from 2016-2019 and commitments at 1st April 2019.
- 3.8. Taking account of the current inadequate plan period we consider that the baseline indicative housing requirement for Broad Chalke over a period of 2018-2040 should increase to 30 dwellings. We also believe that the 13 dwellings already being accounted for were delivered during the period 2016-2018 and therefore should be removed from the completions and commitments calculations. This would mean that under the current proposals Broad Chalke should be planning to deliver a minimum of 30 dwellings over the forthcoming plan period. When including a proportionate addition to account for the increased residual housing requirement across the Salisbury HMA this figure should in our opinion increase to at least 35 dwellings.
- 3.9. Paragraph 41 of Empowering Rural Communities indicates that Neighbourhood Plans will need to have regard to the requirements that apply to be in general conformity with the Local Plan. The Broad Chalke Neighbourhood Plan has been under preparation over the last 3 years and was submitted for examination in December 2020. The Neighbourhood Plan covers a period from 2019-2026 and includes allocations for only 9 new dwelling. This will leave a significant shortfall against the village requirement of some 26 dwellings in Broad Chalke.
- 3.10. New Core Policy: Housing requirements for Neighbourhood Area Designations in the Rural Area indicates that meeting the needs of Local Service Centres and Larger Villages will be met through existing planning permissions, allocations, small sites within settlement boundaries, exception sites and site allocations in the development plan. It then suggests that site allocations will generally be made in Neighbourhood Plans but where this is not the case it may be necessary for the Council to allocate sites.
- 3.11. We support this approach and in the current circumstances at Broad Chalke would suggest that the Council needs to consider a small/medium allocation for additional housing in the settlement over and above those set out in the Neighbourhood Plan to ensure that the housing requirements of the village are met. The land to the eastern end of Knighton Road is presented through this representation as a suitable site to deliver the shortfall not being met through the Neighbourhood Plan process.

- 3.12. We do not however support the suggestion that allocations should happen through a review of the Wiltshire Housing Site Allocation Plan. We consider that it is possible to do this through the Local Plan Review process to ensure that it is suitably robust for examination rather than deferring these decisions to a subsequent review process of Wiltshire's Housing Site Allocations Plan.

Core Policy 44

- 3.13. The Wiltshire Local Plan Review sets out its intention to role forward Core Policy 44 from the existing Core Strategy with some amendments to focus on and clarify the essential requirements for rural exception housing. Core Policy 44 does not support the allocation or delivery of market homes in the rural areas beyond the principal settlements and market towns and in the absence of adequate Local Plan allocations in the rural area and an over-reliance on Neighbourhood Planning it is considered unsuitable and unsustainable to solely rely upon this strategy.
- 3.14. Such an approach does not allow for certainty regarding the delivery of small and medium sized housing schemes even within the Local Service Centres or Larger Villages. These are by virtue of their status in the settlement hierarchy sustainable and suitable for taking some level of housing growth. The reliance on Neighbourhood Plans to deliver all of the required housing growth in the rural area over the plan period is not considered suitably robust and is unlikely to deliver the level of housing required in the rural parts of the Local Plan area.
- 3.15. It also misses the significant opportunity and benefits that small to medium sized sites deliver to the vitality and sustainability of existing rural communities and the robustness they bring to housing supply and delivery early in the plan period. They are of vital importance to short term supply in the plan period whilst larger strategic scale sites work their way through the planning application process and deliver the necessary infrastructure before they begin to deliver new homes.

Affordable Housing

- 3.16. We agree and support the policy that there should be a target of 40% affordable homes on all new schemes of more than five dwellings in rural areas. This policy approach should however include a provision that the level of affordable housing is subject to the adequate viability of sites and that the contribution level may need to vary if suitable evidence if provided that demonstrates a scheme is not viable at the policy provision level.

4. Conclusion

- 4.1. In summary, we do not support the proposed plan period for the Local Plan Review of 2016-2036 and consider that proceeding with the plan period as proposed would fail to meet the 'positively prepared' and 'consistent with national policy' tests of soundness set out under paragraph 35 of the Framework. We consider that the plan period of the local plan review should be amended to cover the period of 2018-2038 at the very least to take account of the anticipated adoption year of 2023 and to be more robust, to plan for growth until 2040 to ensure that it stands up to the tests of soundness during examination.
- 4.2. Furthermore, we are concerned that the Local Plan Review does not provide sufficient land to meet the assessed housing needs of the area due to the inappropriate plan period and the over-reliance on housing delivery rates during the years 2016-2018. Making the necessary changes to the plan period results in the Local Plan Review falling significantly short in terms of the allocations it makes across the plan area to meet the assessed needs and is therefore unsound in that it has not been positively prepared, is not justified and is not consistent with national policy.
- 4.3. Finally, we do not support the suggestion that allocations in the Local Service Centres and Larger Villages should happen through a review of the Wiltshire Housing Site Allocation Plan. We consider that it is possible to make such allocations through the Local Plan Review process to ensure that it is suitably robust for examination rather than deferring these decisions to a subsequent review process of Wiltshire's Housing Site Allocations Plan.
- 4.4. We are concerned that the over-reliance on Neighbourhood Planning in the Local Service Centres and Larger Villages will fail to deliver the scale of housing requirements in the rural areas set out in the Local Plan. We believe that the Council should consider making some allocations in the Local Service Centres and Larger Villages through the Local Plan Review to ensure needs are met and the rural communities continue to thrive and remain sustainable. The land to the eastern end of Knighton Road in Broad Chalke is presented through this representation as a suitable site to deliver the shortfall not being met through the Broad Chalke Neighbourhood Plan process in this Larger Village.

STRAT194

CPRE WILTSHIRE'S RESPONSE TO THE EMERGING SPATIAL STRATEGY DOCUMENT

This growth Strategy is not fit for purpose and fails, since its fundamental assumptions on housing growth, economic growth and employment delivery are not justified when the evidence is examined in detail.

This evidence is contained within the two reports attached and labelled Appendix 1 - Wiltshire Local Plan Housing Assessment and Appendix 2 - Wiltshire Local Plan Economic Land Assessment.

In particular we refer you to the bullet points in these reports as shown below.

See **Appendix 1** Points 3,5,16,24,43, 47.

And **Appendix 2** Points 4,7,8,14,27,48

Consequently, the aspirations as set out in the following sections are questionable at least.

2.1 Growth and Climate Change, which are based on past patterns, have not taken into account the social and economic changes which have taken place during the past year due to Covid, they are flawed and out of date.

There needs to be a detailed re-examination before the next stage of the plan which addresses the most recent evidence, as identified in ongoing reports and papers covering both areas. In particular the implications of the 16 Dec Government Planning Statement need to be addressed. We believe this should lead to significantly different levels of housing and economic need and supply and ensure development is directed at more sustainable locations.

In doing this the Council needs to also address the technical gaps identified in our reports which make it difficult for external parties to understand how figures in the plan are arrived at.

The Strategy is over optimistic, and the pattern set out for Growth is insufficiently robust with regard to Climate Change and in some cases conflicts with it. The sections relating to Transport and Travel patterns will not deliver what should be radical forward-looking policies as a result of an insufficiently strong approach to changing social and workplace patterns.

2.4 -2.13 Delivering the spatial strategy.

The suggestions for revitalising town centres lack sufficient force of approach when considering where new housing should go. Stronger more demanding Brownfield policies would encourage social and economic interactions in the urban areas. Little has changed to the present cautious plan. There is no real ambition to achieve affordability and understand what causes the lack of affordability. Where is the acceptance that the people who drive the demand for housing do not work at the same place. Houses should go where they are needed and there is local employment of the variety and sufficiency to reduce commuting, revitalise town centres and meet climate change targets.

Jobs to people, not people to jobs.

Strengthening the role of Neighbourhood Plans is fundamental to the delivery of growth by democratic voice where it is needed, not where it is imposed,

2.17 Formulating the spatial strategy.

We do not agree with the calculated housing need. In particular the tables set out at Paras 76 and 78 of Appendix 1 conservatively suggest that the housing need in each HMA is lower. These would lead to lower requirements across the HMAs which should be adopted in the next stage of the plan. We have not commented specifically on the numerical split between settlements at this stage but our comments on individual settlements should help to inform those calculations.



Moreover, the economic forecasts are out of date and the issue of “longer term migration” needs to be re-evaluated particularly post Covid 19. They are not fit for purpose to calculate either current housing or economic development needs.

See Appendix 1.

2.19 Alternative Development Strategies

The three bullet points at 2.19 set out and demonstrate why the Plan needs to be rewritten.

The Climate Change issue (unacceptable environmental impacts) has to be seen as wholly integrated with the social and economic factors. Where people live and how they work in future cannot be considered through past trends and evidence.

Deliverability.

This will have to be considered in the light of what the future economic situation in which the country as a whole, as well as individual circumstances, will permit. This can no longer be based on previous working and travel patterns, full employment and cheap money.

Consideration of the growing environmental issues are the priorities when planning for future generations.

WILTSHIRE LOCAL PLAN CONSULTATION

Appendix 1 to CPRE Wiltshire's Response - Housing Need and Supply Assessment for Wiltshire CPRE

██████████

February 2021

1. Background

1. I was asked to review the basis for the housing numbers presented in the Wiltshire Plan Consultation to inform the response by Wiltshire CPRE.

2. I have considered the broad evidence informing the plan, including the 2017 Strategic Housing Market Assessment (SHMA)¹, Functional Economic Market Assessment (FEMA)², Strategic Housing Land Assessment (SHELAA)³ as well as the updated Local Housing Need Assessment (LHNA)⁴ and the Housing Land Supply Supplement (HLSS) 2019⁵.

3. I have some significant concerns about the evidence base, which I found confusing and with important gaps, which made it difficult to interpret. CPRE may wish to discuss with the Council improvements to the evidence base including:

- a. up-to-date estimated yields for sites the council is consulting on
- b. clarity on the assumptions about density
- c. a breakdown of the supply figures for each local and market area (using tables that match the delineation in the emerging plan) showing clearly how the 'residual' element of the plan is derived.
- d. up-to-date data on windfall completions split between small and large sites in each market area.

¹ [Swindon and Wiltshire Strategic Housing Market Assessment \(SHMA\) Report 2017 | Swindon Borough Council](#)

² [Microsoft Word - Final Draft Report v1.0 - Swindon and Wiltshire Functional Economic Market Area Assessment.docx](#)

³ [Monitoring and Evidence - Wiltshire Council](#)

⁴ [Swindon Wilts Local Housing Needs Assessment April 2019.pdf \(wiltshire.gov.uk\)](#)

⁵ [Appendix 5 \(wiltshire.gov.uk\)](#)

4. I was not asked to come to a view on the distribution of housing or on specific sites. This report, therefore, does not consider whether any single location is correct but whether the overall numbers and approach should be supported.

5. My conclusion is that using an estimate of housing need based on the Standard Methodology with a modest allowance for windfalls should be adopted which would reduce the overall need for housing.

6. I have not considered the distribution of residual housing need in detail, but this would allow CPRE to identify the most sustainable locations and to oppose over-provision elsewhere.

7. The Report is in three parts. The first deals with the overall Housing Need calculation, the second with the level of expected Windfall Provision and the third with the approach to Supply.

2. Housing Need

8. The Plan sets out two figures for the Housing Need in Wiltshire. The first is the output from the Government's Standard Methodology, 2042 dwellings per annum (dpa) or 40,840 homes between 2016 and 2036, the second is a figure of 45,630 both derived from the Local Housing Need Assessment (LHNA). The increase is entirely based on assumptions about the balance between jobs and workforce and is derived from the earlier FEMA.

9. The Government also consulted in 2020 on a new Standard Methodology which would have increased the housing need in Wiltshire but it was shelved in favour of retaining the current SM with an uplift to the twenty largest towns and cities in the country with the aim of increasing urban brownfield development. This did not include Wiltshire or neighbouring Swindon.

10. In their published response on 16 Dec 2020⁶ the Government stressed the importance of brownfield development and directing development to urban regeneration sites, as well as the potential for larger scale changes to town centres, reflecting the acceleration of structural change to retail, leisure and other urban uses following the COVID pandemic.

Standard Methodology

11. The standard methodology calculation for a plan based on the ONS 2014 housing projections and the latest 2019 affordability rates for Wiltshire is 2006 dpa or 40,120 homes. It should be noted that the figure of 2042 given in the LHNA assessment and in the plan is slightly higher because it uses the 2018 affordability rates. Because of the

⁶ Government response to the local housing need proposals in "Changes to the current planning system"
- GOV.UK (www.gov.uk)

high prices in Wiltshire this is considerably higher than the base-line demographic need of 1484, so represents a considerable additional housing provision.

12. The Government continues to support the 2014 figures although both the ONS2016 and ONS2018 figures would produce lower national targets. Some authorities have adopted the 2016 figure where it is higher. In the case of Wiltshire, it would amount of 2094. However, when Swindon and Wiltshire are considered together the overall need goes down from 3036 to 2905.

13. The ONS2018 figures are similar nationally to the ONS2016 but because of a shortened period for the calculation of Internal Migration (due to changes in how the NHS monitor movement) they produce higher figures in some areas, which may be influenced by short term factors. In the case of Wiltshire, the figure is 2138.

14. Neither figure would equate to the LHNA calculation, and in terms of the more realistic ONS2016 figures, the result of adopting them would be to direct housing away from Swindon into Wiltshire which would not seem to support the Government's intentions of prioritising urban regeneration or directing development towards the most sustainable locations.

15. The standard methodology superseded the approach taken in the 2017 SHMA, which started with the ONS2012 housing projections and then included a series of additional factors, set out in Figure 69 of the SHMA, such as transitional vacancies and concealed households, as well as adjustments for market signals and balancing jobs. Such an approach has always risked double-counting housing need. It was also already out of date since the ONS2014 figures showed lower household growth in both Swindon and Wiltshire as shown in Figure 32 of the SHMA.

16. I, therefore consider that the figure of 2006 dpa (40120 over the plan period) represents a robust supply figure for Wiltshire.

Local Housing Needs Assessment

17. The LHNA gives an overall figure of 45,630 dwellings, (2281.5 dpa). In reaching this figure it relies entirely on an assessment of the balance between jobs and workers. This is justified by reference to the PPG on Housing and Economic Need⁷. It does not appear that any of the three examples given, a particular growth strategy, additional infrastructure or duty to cooperate, are being called upon.

18. However, while the NPPG could be interpreted more widely than those examples, the case for this higher number in Wiltshire is not based on a specifically identified need and seems to require a somewhat complex process which I am not convinced of.

19. It starts with a requirement figure of 22,389 workers to provide for 'main' jobs. In fact, the FEMA gives a range between 18,800 and 29,900 for Wiltshire, (Fig 5.2) the

⁷ Housing and economic needs assessment - GOV.UK (www.gov.uk)

former being the Oxford Economics figure and the later the Cambridge Econometrics figure for Employment Growth.

20. 5.3.3. of the FEMA assumes an in-commuting rate of 14%. This would leave 16,168 OE or 25,714 CE (20,941 if the simple average of the two were taken). The LHNA figure is, therefore, somewhere between the two projections. There is, however, in my view a number of problems with this approach.

21. The first obvious issue is that the Oxford Economic figures may be lower simply because it puts constraints on job growth resulting from demographic migration patterns included within the model, which are different from the approach of the Cambridge model which allows for less-constrained growth.

22. It is noteworthy that other authorities have relied entirely on the Oxford Economic figures to assess economic need (for example the Leicestershire Housing and Economic Development Needs Assessment undertaken by GL Hearn.)⁸

23. They themselves are cautious about the use of such figures to increase the housing requirement. As they say at 5.3 of their report:

Clearly it would be illogical for an area to increase population growth above the levels shown in trend-based demographic projections (and hence increase housing need) through increased in-migration without consideration of the impact this would have on other locations (where an increase in out-migration might be expected). Economic evidence therefore needs to be treated with a degree of caution, and a recognition that ultimately economic factors are a potential influence on the distribution of development in particular.

24. There is also a potential circularity to the Council's approach, where the assumed increase in jobs increases the housing need which then increases the employment need.

25. This issue is one which Councils were warned about in the Planning Advisory Services' technical advice note on: Objectively Assessed Need and Housing Targets of 2015⁹, even before the Standard Methodology was introduced.

26. Referring to the approach of relying on separate economic modelling 8.10 of the advice note quotes Oxford Economics, who provided one of the economic models for the FEMA. The note says, pertinently:

Whether the calculation is merely circular, or logically inconsistent as shown in the graphic, it cannot produce a valid result, because its logic is faulty. One of the main UK forecasters [Oxford Economics], warns of this problem in its local forecasts method statement:

⁸ [Housing and Economic Development Needs Assessment \(HEDNA\) -Strategic Growth Plan LCC \(11strategicgrowthplan.org.uk\)](https://www.local.gov.uk/sites/default/files/2016/06/Housing-and-Economic-Development-Needs-Assessment-(HEDNA)-Strategic-Growth-Plan-LCC-(11strategicgrowthplan.org.uk))

⁹ [objectively-assessed-need-9fb.pdf \(local.gov.uk\)](https://www.local.gov.uk/sites/default/files/2016/06/objectively-assessed-need-9fb.pdf)

'The population and employment forecasts are inter-linked, thus if more people are attracted into an area this will have implications for the employment forecasts via demand for local services (education, healthcare, retailing, leisure etc.). It is a little more complicated than this as developments in one local area affect another, so the models have to solve this simultaneously.'

Therefore, forecasts from other sources, including alternative population forecasts, should not be set alongside those produced by Oxford Economics' Local Authority District Forecasting Model as they will not be consistent given linkages within the Oxford model.'

27. Indeed, there are areas of jobs growth which are directly related to housing and population growth, for example in terms of C2 and D1 provision, and indirectly in terms of retail and leisure provision.

28. Furthermore, we know that, even if this were a valid approach in 2016, since the FEMA was produced some economic assumption have simply changed. This is referred to in relation to retail and manufacturing in 4.15 of the LHNA. These would tend to dampen the outputs.

29. More fundamentally, the assumptions about employment in sectors such as retail, may need to be reviewed in the light of the accelerated structural changes that have occurred during the COVID pandemic.

30. Again, it is worth comparing another authority. Blaby in Leicestershire is consulting on its plan. It's HEDNA is more recent than Wiltshire's yet the New Local Plan Options Consultation (Para 4.2.3)¹⁰.

The District Council has been working together with the other local authorities in Leicester and Leicestershire to consider the wider needs for employment land and premises across the functional economic market area. This has been informed by evidence including the 'Housing and Economic Development Needs Assessment 2017' (HEDNA). This is somewhat dated and there have been multiple changes in circumstances including: the economic impacts of the COVID 19 pandemic and Brexit; new Government Planning Policy Guidance; changes to the Use Classes of some employment uses, and amendments to permitted development legislation that allow changes of use to and from employment uses

31. As a result, the authority has identified a need to up-date their evidence. We believe Wiltshire should do the same.

32. The LHNA concludes that 4,781 additional homes are required to meet the jobs requirement. But the OE base line figure is actually 6,221 less than the LHNA figure of 22,389, suggesting that their modelling would not require any additional housing, even if one discounts other factors that may mitigate against the approach being taken.

33. In other words, without more specific growth proposals, this very generalised economic modelling does not seem to me to point unequivocally at a need for

¹⁰ New Local Plan - Blaby District Council

additional housing and there are good reasons to think otherwise, both in terms of the modelling itself and in terms of the Government's aim to direct housing firstly to urban areas.

34. As a result, I consider that the figure of 40,120 using the Standard Methodology should be considered robust and be adopted.

3. Windfalls

35. Having set a housing need figure above the Standard Methodology the plan does not appear to include any allowance for windfalls in determining the level of housing shortfall. 3.15 and 3.16 of the Emerging Spatial Strategy make this position clear. Instead, a brownfield target is created for each area, which is a breakdown of the housing they aim to direct to brownfield sites up to 2031. All together it amounts to 2260 homes, but this is explicitly not included in the overall supply calculation.

36. According to 3.16: 'Homes from previously developed land ideally should be identified by having planning permission or by being allocated in a plan.' Unfortunately, this misses the point of a windfall allowance which accounts for homes not allocated in a plan, where there is compelling evidence of a steady supply.

37. There are some windfalls included in the 2019 Housing Supply Statement up to 2016 but is unclear that any of these are included in the opaque supply figures behind the residual figures in the emerging strategy so I have assumed they are not.

38. Nor does it address the NPPF requirement to give 'great' weight to windfall provision (para 68) and to consider whether there is robust evidence for a windfall allowance (para 70) which can be included in the calculation of housing supply, and which may impact both on whether there is a shortfall and how great that shortfall is.

39. The approach to assessing this is set out clearly in NPPG Guidance on Housing and economic land availability assessment¹¹ and that would in my view lead to the conclusions that there is compelling evidence of on-going windfall supply.

40. Appendix 5 of the 2019 Housing Land Supply Statement gives some detail about windfalls in Wiltshire from 2006-2019. Permissions dropped after 2010 but completions have remained significant, never dropping below 400 per annum except in 2012 which would probably reflect the impact of the recession. Windfalls account for 27% of delivery during that period. Overall, there were 7471 windfall completions, (970 identified in SHELAA) which amounts to 575 per annum. In Para A.11 the report is clear that the current level of supply is likely to be maintained:

Given the relatively low proportion of SHELAA sites submitted on brownfield land, this contribution is unlikely to change over time, whilst the overall number of

¹¹ [Housing and economic land availability assessment - GOV.UK \(www.gov.uk\) 023 Reference ID: 3-023-20190722](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/424242/Housing_and_economic_land_availability_assessment_-_GOV.UK_(www.gov.uk)_023_Reference_ID:_3-023-20190722)

windfall completions looks likely to maintain current delivery levels, supplied by the consistent numbers of windfall permissions being granted as shown in recent years

Chart 1: Windfall permissions

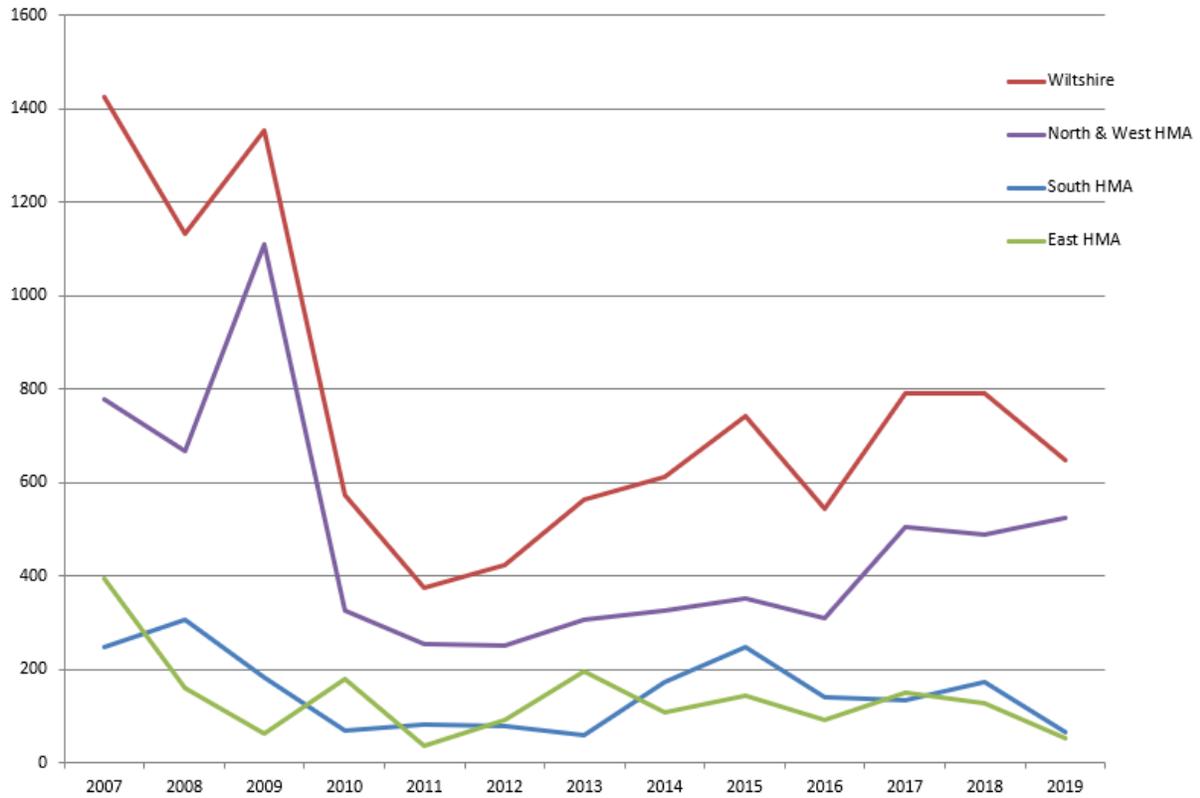
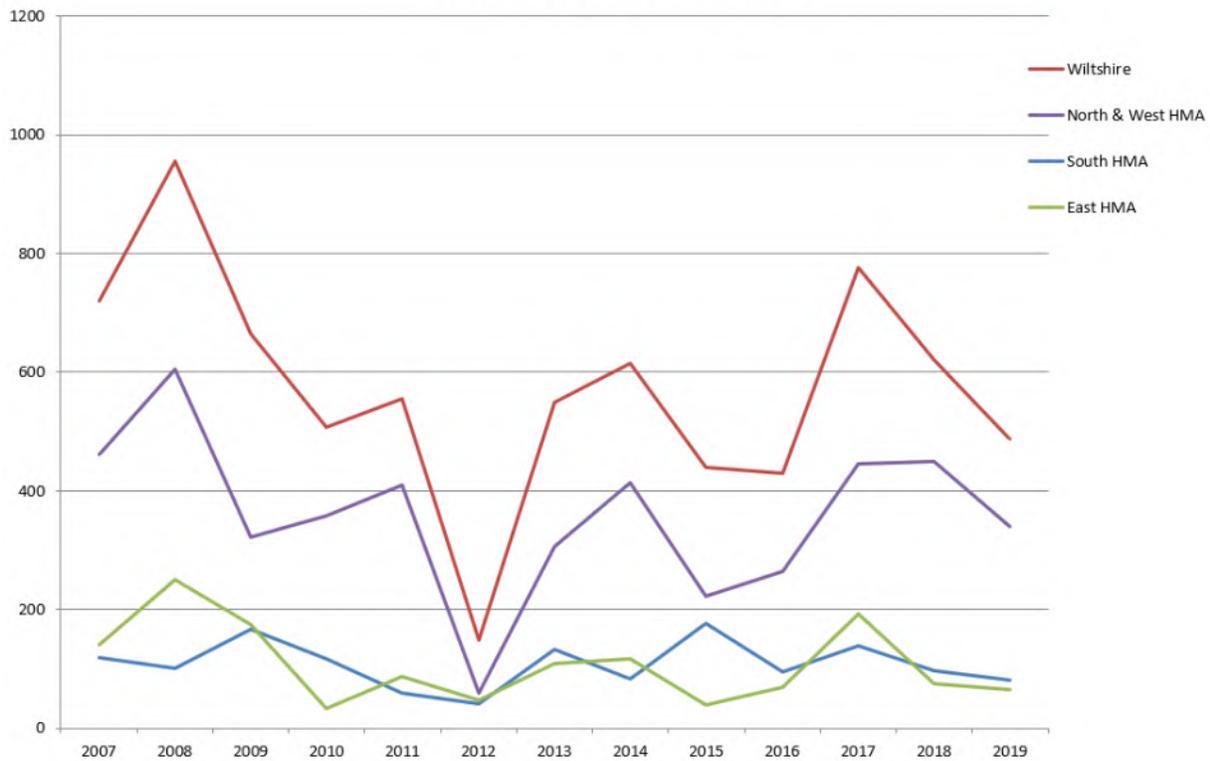


Chart 2: Windfall completions



41. The report also points to changes to permitted development rights as an additional source. In A.17 it suggests, not only small but larger windfall sites are likely to continue to come forwards, something made more likely by the dramatic changes to retail and leisure needs expected post COVID, as major high street shops close.

42. The report then seeks to assess windfalls over the next 5 years based on permissions. It bases this on 590 windfall permissions per annum and then discounts those which are not built year on year. The resulting figure is 1289 dwellings over 5 years or 258 per annum. In A.30 it makes clear that this is a conservative estimate because of the assumptions made in the calculation. It also gives two alternative approaches creating a range between 991 and 1647 for the five years.

43. Not only does it appear that there is compelling evidence that there is a robust windfall supply but the Council themselves have identified a conservative level of windfall supply which they have then not applied to the plan.

44. Returning to the NPPF, if one took the Council's figure of 258 windfalls per annum and assumed it from 2022 -2036 (It is common to discount the first three years of windfalls on the assumption they should already be in the system), one would arrive at a supply figure of 3612. However, it seems to me that the Completions evidence is more likely to be reliable over time, as it avoids the issue of lapsed planning permission, and one could simply assume a conservative figure of at least 400 dpa, or 5,600 homes over the plan period and, if one took the overall average of 575 dpa, 8050 homes in total.

45. It is also to be noted that Wiltshire do not include Greenfield windfalls in their calculation (although this is not stipulated in NPPG or Para 70 of NPPF). This again makes the figures conservative. While such windfalls might not be encouraged (in line with para 68 of NPPF), in as much as they occur, they do provide additional houses within the supply.

46. It would be helpful if there were separate tables of both small (1-9 homes) and larger windfall sites for each market area included in the evidence but I could not find this.

47. In other words, taking a conservative 5,600 (400 dpa) as a compelling windfall level, the overall need figure for Wiltshire would be reduced from 40,120 to 34,520 or, if one accepted the Council's FEMA driven need figure, 40,030.

48. It would be theoretically possible to break down this figure to each HMA and to reduce the overall need figure disproportionately. However, it seems to me that the windfall supply is best addressed at the higher county level, since the supply of windfalls, particularly larger windfalls is, by its nature bitty, (See the graph for Salisbury at 3.10 of the emerging strategy) and there is likely to be compensatory effects between areas.

49. Moreover, since additional supply (perhaps above these conservative levels) is likely given post COVID changes in urban land use, it is likely that the Principal Settlements have a disproportionate role to play in windfall delivery in line with the over-arching aim of the plan.

4. Supply

50. I found the evidence on supply somewhat obscure and I have significant concerns about how easy it is for someone externally seeking to examine the level of supply (either at a macro or micro level) to do so.

51. In terms of proposed sites, I could not find a single list of all these included in the plan consultation. Nor could I find up-to-date estimates of the anticipated yield from individual sites, except in the case of the Principal Settlements.

52. The site selection documents include SHELAA references but since the sites are not necessarily in the same designated area in the SHELAA documents as in the Site Selection paper, it is made difficult to marry the SHELAA evidence and the Site Selection evidence. Moreover, yields in the SHELAA appear to be only approximations based on 30 dwellings per hectare and not site examinations.

58. In Appendix 1 I have shown a table of sites which I extracted easily from the Wyre Forest Plan SHELAA evidence which informed their plan. I would have liked to take a similar approach in this case but was unable to do so.

59. This means that for someone considering a local area, even if they add up the yield from sites in the area in the SHELAA, they are not in a position to compare it with the totals given in the consultation. For example, in Amesbury, the SHELAA value for sites 3379 and 3186 is 417, more than the residual target, but it is unclear if that is the achievable yield from the site, especially as no figure is given in the Consultation Documentation itself. The Council suggests they are pausing the process so they can consult on alternative sites in non-Principal Settlements, but that can only be done if the consultee has the appropriate information.

60. In the case of the Principal Settlements more detailed estimates are given in the Site Selection Documents.

61. I looked specifically at Chippenham where a yield of 5586 is given for all three preferred sites. However, if one goes to the SHELAA (where one has to add up the individual parcels), Site 1, for example, comprises 7472 homes. Clearly, this figure has not accounted for the constraints on the site such as the flood plain, so is exaggerated.

62. However, when one comes to the Sustainability Appraisal the figure for that single site is between 6100 and 8539 (the latter figure based on a simple 35 dpa). This raises concern that weight has been put in the Sustainability Appraisal on a housing yield which is not the yield the plan makers anticipate. This brings into question the validity of the SA result.

63. A further issue arises in relation to density policy. There is no density policy in the plan, nor is there any consultation question in relation to density. It is unclear what density assumptions are being made in the design process.

64. So, for example, the yield of 2975 homes on Site 1 in Chippenham might be increased if a minimum density policy were in place. It would seem to me that a reasonable alternative within the plan that should be consulted on is a minimum housing density requirement. The consultation does not allow one to consider that.

65. In other words, it is not possible in any meaningful way to consider how far the sites identified relate to the target residual supply or to come to a meaningful view as to which sites might be required. One cannot simply say whether the sites identified match the residual need or whether they exceed it and by how much, making any meaningful choice difficult to make. Nor is it possible to address the balance between density and land-take across a housing market area.

66. The other problem with the approach to the consultation is that it seems to be assumed that the targets for each sub-area should be met at each sub-area level. In fact, the housing need exists at a housing market area level, so the first question should be whether the housing supply is sufficient for that market area.

67. The current approach risks over-supplying in each settlement and that over-supply accumulating across a housing market area. This is evident where a local area is listed in the plan as not having a residual need (marked '0' in the table.)

68. Some of those areas may have an excess of existing supply in place which could offset need elsewhere in the HMA if the supply data for each local area was actually tabulated in the plan.

We did ask the Council to provide: *'the breakdown of the sources of supply which informed the residual calculation for each local area broken down by category i.e., permissions, commitments etc... (In most cases this will sum to the difference between the strategy figure and the residual figure but in cases where the residual supply is 'Zero' the total may, of course, exceed the difference between the strategy figure and the residual figure.)'*

69. Instead, (see Appendix 2) they referred us back to the housing land supply statement. This is itself difficult to marry up with the emerging figures.

70. The tables in their Appendix 1 are based on the old housing market areas and it is unclear whether or not windfalls should be included when comparing it with the Emerging Plan and to which settlements they have been assigned if they have.

71. I did add up all the supply identified for Devizes in that Appendix and arrived at a figure of 876 which is different to the emerging plan where the gap between need and residual is 1000. There may be a good reason for this but currently one has to compare apples with pears so it is not clear.

72. In the case of Wilton where the residual is zero, the supply given in the statement is 482 above the 400 given as the figure for need. This suggests some over-supply which has not been included in the HMA supply calculations. However, because the two documents are inconsistent in regards to the areas involved it would be difficult to marry the two. This is, in my view, something which could have been avoided if the Council provided clear up-to-date supply tables based on the emerging market areas.

73. So, while it is quite appropriate for the Council to ask stakeholders to consider the spatial distribution of housing between settlements, the consultation does not allow one straightforwardly to consider the overall housing supply for each housing market area.

74. The only way to resolve these issues is to a. review the proposed sites and provide an expected yield in a format which is easy for external consultees to navigate and b. provide a breakdown of the key elements of the existing supply for each sub-area (as set out in the emerging plan), broken down into commitments, permissions etc...

5. Conclusion

75. I am not convinced that there is a case for additional housing above the Standard Methodology figure of 40,120.

76. There also appears to be compelling evidence for an on-going windfall supply of 400 dpa across Wiltshire, which would leave a residual requirement of 34,520 homes.

Dividing those between the housing market areas in line with the current balance of housing would lead to the following figures.

	Total	Supply ¹²	Residual
Chippenham	14706	10540	4166
Salisbury	8837	8315	522
Swindon	2485	2020	465
Trowbridge	8457	7795	662

77. This would require significantly lower housing allocations which could easily be accommodated on some of the sites identified in the Principal Settlements or with a reduction of need reflected across the local areas in each HMA.

78. Based on 40,030 (the LHNA figure with windfalls included) the table would be as follows:

	Total	Supply	Residual
Chippenham	17053	10540	6513
Salisbury	10248	8315	1933
Swindon	2882	2020	862
Trowbridge	9807	7795	2012

79. Taking account of the evidence on Need and Windfalls I would suggest the need for housing allocations should be reduced across Wiltshire. It is worth noting that if the 5,200 windfalls are added to the 45,630 allocated sites in the plan the total provision would be 50,830 homes (even excluding any over-provision when the local totals are added). This would be 21,150 (or 71%) above the actual ONS2014 demographic need of 29,680.

80. I have not considered the distribution of housing but CPRE will want to identify those sites which do least damage to the countryside, which I suggest should be done at an HMA level, although, as set out above, I have concerns about the evidence base in this regard.

81. CPRE may also wish to consider whether a minimum density policy should be adopted within the plan.

¹² *Note: the supply figure in both tables is based on subtracting the residual requirement from the emerging strategy in the plan, however it should be noted that in some local cases the residual supply is zero, in which case there may be oversupply in that area which is not accounted for so these figures may underestimate supply

Appendix 1:

Green Belt Supply Side Table for Wyre Forest

Plan Table	Ref	Site	Dwellings	Hectares	Housing/Mixed
30	WFR/WC/18	Sion Hill School Site	56	2.1	H
30	WA/KF/3	Land at Low Habberley	120	5.6	H
31	WFR/WC/15	Lea Castle Hospital	600	48.4	M
31	WFR/WC/32	Lea Castle East	300	19.9	M
31	WFR/WC/33	Lea Castle West	400	24.5	M
31	WFR/WC/34	Lea Castle North	100	11.5	H
32	OC/5	Land at Husum Way	30	2.1	H
32	OC/6	Land East of Offmore	300	28.36	H
32	OC/12	Comberton Lodge Nursery	10	0.8	H
32	OC/13N	Stone Hill North	1100	57.1	M
33	AKR/18	Yew Tree Walk	85	3.73	H
33	LI/11	Land West of Former School Site, Coniston Crescent	200	9.53	H
33	MI/38	School Site, Coniston Crescent	115	3.64	H
34	WA/BE/1	Stourport Road Triangle	100	3.67	H
34	WA/BE/3	Cathcem's End	75	5.61	H
34	WA/BE/5	Land South of Habberley Road	35	1.71	H
Total			3626		

Wyre Forest Green Belt housing sites from Tables 30-36 in Pre-submission Plan (not including Traveller Sites and Economic Development Proposals)

Appendix 2:

E-mail response to [REDACTED], CPRE Wiltshire Administrator from [REDACTED]

Dear [REDACTED]

Thank you for the enquiry. I've provided responses to [REDACTED] letter dated 8 February 2021 in red below.

1. Could you provide the breakdown of the sources of supply which informed the residual calculation for each local area broken down by category i.e., permissions, commitments etc... (In most cases this will sum to the difference between the strategy figure and the residual figure but in cases where the residual supply is 'Zero' the total may, of course, exceed the difference between the strategy figure and the residual figure.)

The 2019 Housing Land Supply Statement provides a comprehensive list of the sources of supply and the stage of development (e.g. outline/detailed permission, committee resolution, allocation) that each site has reached. This is available on the Council's website but I've attached a copy to this email.

- Appendix 1 (page 17 onwards) includes a site-by-site list of Large sites and allocations (including Neighbourhood Plan allocations). The final column in the table indicates which settlement or Community Area rural remainder the site contributes to. The table is organised by the HMAs set out in the Wiltshire Core Strategy.
 - Appendix 2 (page 41 onwards) includes a list of Small sites with planning permission. Again, this is organised by WCS HMA, then by the main settlement or Community Area rural remainder that each site contributes to.
 - If you are looking to identify the sources of supply for each of the emerging HMAs (as set out in the Emerging Spatial Strategy consultation paper) you will need to assign sites in the Melksham Community Area to the emerging HMA they sit in as this Community Area split is split between the Chippenham HMA and Trowbridge HMA. I've provided this in the attached spreadsheet as the data in the Housing Land Supply Statement does not show this.
2. Could you provide a table of historic windfall completions for each HMA split between small and large windfalls. I am assuming the definition you use of small windfalls is 1-9 homes but let me know if it is different.

I've attached a list of brownfield windfall completions and losses in the WCS period to date (2006-2019), including whether they are part of a Small site (<10 dwellings) or a Large site (10+ dwellings). They're listed on a building basis (i.e. house or blocks of flat) so there will instances where there are multiple entries for a particular site. However I trust the data provided should be sufficient to identify the location of the relevant sites.

I hope this provides the information you requested, but please come back to me to if you'd like any of the data clarified.

Best regards

[REDACTED]

[REDACTED]

WILTSHIRE LOCAL PLAN CONSULTATION

Appendix 2 to CPRE Wiltshire's Response - Economic Land Assessment for Wiltshire CPRE

██████████

February 2021

1. Background

1. I was asked to review the basis for the economic land numbers presented in the Wiltshire Plan Consultation to inform the response by Wiltshire CPRE.

2. To do this I have considered the broad evidence informing the plan, in particular the 2016 Functional Economic Market Assessment (FEMA)¹ and the 2018 Employment Land Review (ELR)².

3. While these provide a snap shot of the situation at that time, I have some concern that the Council continues to rely on these documents (see footnote 6 to the Consultation Strategy) both for the economic land requirement and for housing need assessment, without having reviewed the robustness of the assumptions and projections behind those reports given the uncertainty about many areas of economic activity (such as retail) in the future.

4. The ELR reassures the reader in Section 2 of the Executive Summary that little has changed since the FEMA was produced in 2016. 4 years later it is hard to say that is still true.

5. There is also, as I said in the paper on housing numbers, a potential circularity to the Council's approach, where the assumed increase in jobs increases the housing need which then increases the employment needs. This issue is one which Councils were warned about in the Planning Advisory Services' technical advice note on: Objectively Assessed Need and Housing Targets of 2015.³

6. A quote from Oxford Economics, which provided one of the economic models for the FEMA, is pertinent:

¹ [Microsoft Word - Final Draft Report v1.0 - Swindon and Wiltshire Functional Economic Market Area Assessment.docx](#)

² [wilts-elr-report-final.pdf \(wiltshire.gov.uk\)](#)

³ [objectively-assessed-need-9fb.pdf \(local.gov.uk\)](#)

‘The population and employment forecasts are inter-linked, thus if more people are attracted into an area this will have implications for the employment forecasts via demand for local services (education, healthcare, retailing, leisure etc.). It is a little more complicated than this as developments in one local area affect another, so the models have to solve this simultaneously.

Therefore, forecasts from other sources, including alternative population forecasts, should not be set alongside those produced by Oxford Economics’ Local Authority District Forecasting Model as they will not be consistent given linkages within the Oxford model.’

7. Of course, in housing terms the old approach to establishing housing numbers should have been superseded by the Standard Methodology but Wiltshire Council has chosen to over-ride the SM and adopt higher figures based on the FEMA as I discuss in more detail in the housing paper.

8. Equally, however, that has implications for Employment Land need which appears to have been largely derived from assumptions about jobs growth, feeding into the need for offices and industrial space.

9. In this report I consider broadly how that process appears to have worked and the issues it raises.

2. Functional Economic Market Area Report (FEMA)

10. The FEMA report (which also covers Swindon) starts by defining three functional market areas:

- Swindon/M4 corridor
- A350 and west/central Wiltshire towns
- Salisbury/Amesbury/A303

11. Evidence on growth zones and travel to work mapping seems to support these divisions. And, as is also pointed out, the zones have different spheres of influence outside the FEMA area.

12. These zones it should be noted, however, are not coterminous with the housing market areas established in the SHMA and adopted in the Plan for the purpose of defining employment land needs.

13. The FEMA then projects future employment by class (Table 2). What is noticeable is how much of this is dependent on either retail or office development, with over 30% of the need in all cases for classes A1 and B1 accommodation.

14. Table 4 converts this growth in employment into employment land need for each area. The quantum of industrial land is fixed but a range is given for office

development reflecting the very different land use requirement for town and out of town office development.

15. It should be noted that these projected future employment levels are an amalgam of two models, the Oxford Econometrics and Cambridge Economics forecasts, with the Oxford Econometrics model predicting lower job growth generally. As I explain in the housing paper, this is likely to partly reflect the different approach in the two models to migration and population inputs. In some case, including particularly D and C uses, there is also a clear direct relationship between population and jobs. You are likely to need more nursery staff, for example, if you have more people of working age.

16. Table 5.2 shows the wide difference between the two models, with OE predicting 18,800 additional jobs and Cambridge Econometrics 29,900 between 2016 and 2036, although in the OE prediction there is also more employment in Swindon, though not enough to close the gap. Both are forecasting overall higher growth than the Strategic Economic Plan for Wiltshire (2014).

17. Appendix 7 of the FEMA considers this in a little more detail⁴. At 5.1 the appendix says

The total jobs forecasts for Wiltshire are 18,800 (OE) and 29,900 (CE). Initial comparison with demographic analysis emerging from the SHMA suggests the higher level of growth may be beyond what can be sustainably supported by workforce growth. The OE and CE models will be internally consistent with workforce and job growth nationally and locally. Detailed data on demographic assumptions have not been provided by the forecasters. If their models forecast lower workforce growth it would act as a brake on job growth. This suggests a far greater positivity in respect of workforce growth by CE

18. At 5.4 the Appendix suggests further caution is needed:

There is also some imbalance in the early years of the period between existing policy ambition and the level of jobs forecast, with forecasts potentially in excess of growth expectation.

19. Nevertheless, the FEMA approach is to take the average of the two projections with the exception of a few specific exceptions set out in 5.4.2. The net additional jobs by use class are set out in Table 5.5 for both Swindon and Wiltshire. Again, it is apparent how many of these jobs depend on areas of the economy which themselves rely on population growth.

20. These figures are then converted into floorspace requirements and hence land requirements. The report, however acknowledges (for example in relation to A1 retail development at 6.2.1) that there is a difficulty in doing this because not all industrial development is as dense. This is particularly pronounced when considering out of town and in town requirements (for instance in relation to car parking). The resulting land use figures (which are given as a range for some uses) can, therefore, be seen as

⁴ [Microsoft Word - Appendix 7 - Baseline Forecast Analysis - Draft v1.0.docx \(wiltshire.gov.uk\)](#)

leading to policy-on choices, e.g., where does one encourage retail development. 6.2.4 quantifies this discrepancy with in town office development can be 1:1 while out of town typically only utilises 40% of the land.

21. The land requirement resulting from this assessment is then set out in Table 6.4 (Essentially the same table as Table 2) and this is deemed to be consistent with the 19 hectares per annum (hpa) of land for business which has been historically (albeit lumpily) delivered. The report then suggests 15 hpa should be provided across Swindon and Wiltshire, just under 300 hectares from 2016-2036.

3. Employment Land Review (ELR)

22. To take the FEMA results forwards the Employment Land Review (ELR) for Wiltshire (May 2018) considers the supply of land specifically in Wiltshire to meet the need in the FEMA.

23. It assumes little has changed in terms of economic fundamentals and its figures for need can generally be compared directly with the FEMA for the A350 and Salisbury areas.

24. However, it should be noted that the Swindon area only includes part of the FEMA figure and I could not ascertain exactly how this split was derived. Those three sets of figures are set out in Figure 0.1. It can also be seen that the need is predominantly for Industrial rather than Office Development.

25. To consider whether the need can be met on existing sites, Wiltshire carried out a review of sites which were already allocated and, in a few cases, unallocated. They then discounted sites which had a high risk of non-delivery, although these only seem to account for about 6 hectares. I have not reviewed these sites myself but have assumed their analysis was robust.

26. The resulting Figure (0.4) shows the total land considered available, which amounts to 172 hectares across Wiltshire, of which 166 hectares is considered at low or medium risk. Figure 0.5 then compares an overall need generated by the FEMA (157 ha to 182 ha) with the supply of 166 hectares.

27. The 166 hectares figure results in a potential shortfall (16 hectares) but only if the higher figure for need is adopted, although the ELR goes on to explain that there is also an overall surplus for the first 5 years.

28. For the split between the three areas the report suggests that:

In the M4/Swindon (Wiltshire) FEMA, demand for employment land exceeds supply over the whole plan period (2016 to 2036) and during the first five years. There is potential for more land to be allocated at Marlborough, and at Malmesbury, where there is little supply, to capture growth in proximity to Dyson.

In the A350 FEMA, the potential supply (excluding sites that are un-allocated or at high risk of non-delivery) is just above the range of potential demand scenarios. The market is interested in Chippenham, and there is scope for more land to be allocated here, as well as at Melksham and Corsham.

In the A303/Salisbury FEMA, there is sufficient land to meet demand during the first five years of the Local Plan period, but not enough land to meet the forecast demand over the whole 20-year plan period. There is potential for more allocations in the Salisbury area to enable growth here, but sites have not yet been identified.

29. Figure 3.1 then gives a breakdown of the requirement in each area based on the FEMA results (although for Swindon the link is harder to verify as it is only a proportion of the land in the Swindon analysis in the FEMA). The range of figures results entirely from uncertainty about office accommodation needs.

30. A series of 6 options is then considered for the breakdown of demand within each FEMA, taking account of factors such as past performance, housing and market interest. None of these seem to consider the sustainable development or climate change issues related to each possible pattern of development. There seems to be particular interest in Chippenham despite the lack of overall need in the A350 FEMA.

31. Further consideration is given to the marketing of sites and improving deliverability, and in Chapter 6, the question of shortfall is considered. At the upper level of demand the analysis results in a shortfall of 16 hectares across Wiltshire. However, that is likely, the report says, to apply to industrial rather than office development (see Figure 6.2). There is also no shortfall in the first five years.

32. The report then considers the specific situation for each of the three areas. In Swindon there is considered to be a shortfall of 5-8 hectare and 4 hectares in the first five years

33. On the A303 corridor there is a shortfall of 3-12 hectares but none required in the first five years.

34. On the A350 corridor, there is an excess ranging from 3 to 16 hectares, but the report suggests both Chippenham and Trowbridge lack a choice of supply.

35. Lastly, they refer to specific unallocated sites they have tested, and to proposals for two 'exceptional' sites on the M4 Junction [17](#) amounting to 77 hectares which they do not suggest require including.

4. The Draft Plan

36. At Para 2.18 the draft plan includes a table of additional need for land for business. It says:

‘Studies of employment needs for the plan period resulted in a forecast requirement to plan for an additional 26ha of land for business’.

37. Footnote 6 identifies these as the FEMA and ELR. This is then split into the four HMAs three areas, 6 hectares for Swindon (Wiltshire part), 10 for Salisbury, 9 for Chippenham and 1 for Trowbridge.

38. It should be understood that these numbers conflate two things. The Salisbury and Swindon numbers are based on numerical calculations, whereas the figures for Chippenham and Trowbridge (as discussed above) are based on a perceived need for additional sites in those settlements to provide choice, something based on anecdotal evidence.

39. The actual FEMA requirement for land is, therefore, only 16 hectares, and the rest is additional to that.

5. Commentary

40. The need to allocate industrial and office space is far from an exact science and it is important that local authorities provide a range of sites which are appealing to the market. However, with the exception of Chippenham and Trowbridge the analysis here appears to be largely arithmetical. The Plan does not identify particular sizes or types of sites where the current portfolio is inadequate. Instead, it quantifies need purely based on arithmetic employment calculations.

41. Those employment calculations were undertaken in the FEMA of 2016 and it was admitted at the time that they could be influenced by BREXIT. In 2018 it appeared little had changed when the ELR was undertaken. However, it is hard to argue that is still the case. It is clear that the impact of COVID may not be only recessionary but also structural, particularly in sectors such as retail.

42. This clearly impacts on those projections. For example, Para 5.3.5 of Appendix 7 sets out the jobs projections in retail for Swindon and Wiltshire. They are 700 using OE and 2100 using CE. Since the final figure is a blend of both, one can see that the assumption for retail employment growth was subject to significant doubt at the time and even more so now with the contraction of the High Street.

43. Not only are the projections for employment growth based on pre-BREXIT/COVID assumptions, they are also significantly higher than the household projections from

ONS, even when the standard methodology is applied. The additional households required add approximately 13%. As PAS point out there is a circularity to such additions.

44. The lower Oxford Economic projections may, in fact, be more realistic because they allow for population movement to influence economic activity. That may be why Leicestershire, to take one example, only used the Oxford projections in their Housing and Economic Needs Assessment⁵.

45. There is a further issue, particularly, in terms of office development, that transferring floorspace to land requirement is highly dependent on the density of development. Hence the range of figures with the lower end being beneath the supply level. This is also dependent on how much industrial space, particularly offices, is in town and how much out-of-town. While this is partly a market driven issue it is also a policy issue with impacts for sustainable development.

46. Furthermore, one can also assume that, while significant amounts of future employment will require additional space, there are likely to be changes to working practices post COVID, particularly in terms of home-working, which will reduce the need for office space.

47. In other words, it is not clear to me that the arithmetic approach supports the relatively marginal (10%) extra need for industrial and office development. It also appears to be likely that it is mainly in industrial land that any shortfall might be felt but the plan does not prioritise that.

48. As a result of these factors, I am not convinced whether the shortfall in land for business truly exists at an arithmetic level. Even if it did it would largely apply to the later part of the plan period, probably after a further review which would benefit from more up-to-date post BREXIT and COVID evidence.

49. In terms of the current supply, an interrogation of the full site assessment information provided in Appendix 9 of the ELR which compared sites with specific identified needs might identify specific shortfalls of sites, whether type (e.g. logistics provision) or size (e.g. larger sites which serve a strategic purpose), or also short-term supply issues, but that is beyond this report and is not something stressed in the Draft Strategy as justification for the additional supply of industrial land.

50. Since there is no suggestion of a need for regionally significant sites, and the two larger sites on M4 Junction 17 are rejected, it appears that the need is generalised and so could be met by a variety of options.

51. Furthermore, given the amount of land required I would have liked to have seen consideration of policies to encourage higher density development at sustainable locations where that is appropriate. One difficulty with the Sustainability Appraisal is that it assumed the figures in the Plan and only considered where those could be met,

⁵ [Housing and Economic Development Needs Assessment \(HEDNA\) -Strategic Growth Plan LCC \(llestrategicgrowthplan.org.uk\)](https://www.llestrategicgrowthplan.org.uk)

whereas for some development reasonable options might include a variety of locations with different densities.

52. Moreover, it is assumed in the Plan that the numerical over-supply, resulting from identified local supply issues, in Chippenham and Trowbridge does not compensate for shortages elsewhere. In effect the arithmetic shortfall is met in Salisbury and Swindon and then the Chippenham and Trowbridge numbers added on. I would like to understand why that is the case.

53. Moreover, the assumptions behind the shortfall in the Swindon corridor remains unclear to me. The ELR only considers meeting that portion of the need within Wiltshire. However, the need is across the two authorities. It may be that there is land allocated within Swindon which could meet that need or new allocations which could be made in Swindon at more sustainable locations.

54. The 2017 Strategic Framework for the two authorities is, as far as I can see the most up to date published joint statement. The Framework page on Swindon's website suggests:

A Statement of Common Ground should, therefore, be prepared between Wiltshire and Swindon to confirm the extent of joint working between the two authorities.

This includes whether:

- *the proposed employment land requirement identified in the Swindon and Wiltshire FEMAA can be accommodated within each authority's boundaries and if not the extent of the shortfall in provision⁶*

55. It seems to me that the authority should provide evidence as to why the additional employment land allocated in that corridor should be specifically allocated in Wiltshire.

56. More generally, and in all the corridors, I would have liked to see more emphasis on the quality of the sites, matching employer demand, rather than the quantum or size. Without employer orientated consideration, there is a risk that oversupply will lead to lack of uptake.

⁶ Swindon and Wiltshire joint spatial framework | Swindon Local Plan | Swindon Borough Council

6. Conclusions

57. The justification for the shortfall in land for business (both offices and industrial) is based on evidence which predates the impacts of both BREXIT and COVID. It is likely that at least some changes in working practices will persist that will impact on both the need and supply of space for business.

Moreover, the shortfall only occurs if one adopts more bullish assumptions about economic growth and population growth.

58. Given that the shortfall accounts for only about 10% of supply and is unlikely to occur until late in the Plan Period, the justification for additional allocations seems to me limited.

59. In terms of the specific FEMAs, the shortage of choice of sites in Chippenham and Trowbridge, while identified as anecdotal, might justify additional provision. I was not asked to consider whether that anecdotal evidence was justified but I understand CPRE will make representations on that. However, even if it is, it is not clear to me why no consideration is given to whether this should be considered to compensate for the modest shortfalls in the other FEMAs.

60. Moreover, I am unclear why there is no consideration of whether the shortfall in the Swindon FEMA could or should be met within Swindon Council.

61. While there may be a case for modest additional allocations based on specific shortfalls of available sites, these considerations do not appear to be clearly articulated in the supporting material.

62. Furthermore, neither the plan nor the Sustainability Appraisal considers reasonable options which would reduce the amount of land required

63. My view, therefore, is that CPRE Wiltshire has justification for objecting to those allocations and specifically identify further work which would be required to robustly justify continuing with this level of additional allocations for business use as the Plan progresses.

64. The objection should not only be to the quantity of development, but it needs to identify the purpose of any additional allocations.

STRAT197a

The Emerging Spatial Strategy Consultation Response Form

Ref:

(For official use only)

The overarching 'Emerging Spatial Strategy' paper identifies the proposed overall level of new homes and employment land for each main settlement and rural part of the HMA, over the plan period, together with what remains to be planned for once existing housing completions and commitments have been accounted for.

To view the Emerging Spatial Strategies paper please visit the Council's Local Plan Review Consultation page on it's website at: <https://www.wiltshire.gov.uk/planning-policy-local-plan-review-consultation>

Please return to Wiltshire Council, by 5pm on Tuesday 9th March 2021.

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

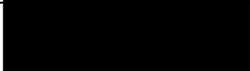
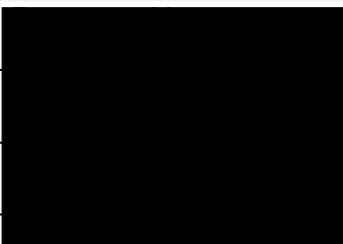
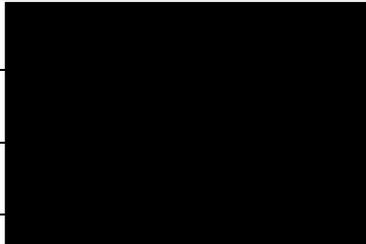
This form has two sections:

Section One – Personal details

Section Two – Your comments on the Emerging Spatial Strategy. Please use a separate sheet for each representation.

Section One – Personal details

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

	1. Personal details	2. Agent's details (if applicable)*
Title		
First name		
Last name		
Job title (where relevant)	Land and Planning Consultant	Principal Planner
Organisation (where relevant)	Hannick Homes and Developments Ltd	Pegasus Group
Address Line 1		
Address Line 2		
Address Line 3		
Address Line 4		

Postcode		
Telephone Number		
Email Address		

Section Two – Please enter any comments you have regarding the Emerging Spatial Strategy in the box below.

Comment:

Pegasus Group are instructed to submit representations to the Wiltshire Local Plan Review (Jan 2021) Regulation 18 public consultation (WLPR) on behalf of our clients Hannick Homes and Development Ltd with regard to their land interests in Wiltshire.

The consultation, which comprises a suite of documents and associated evidence base, builds on earlier engagement with councillors, council partners and the public undertaken since 2017, however to date there has been no consultation on a whole emerging draft plan indicating the Council's preferred potential housing and employment allocations to meet plan period need with an accompanying suite of emerging development management policies.

The consultation does not relate to a full draft plan but to the Council's emerging spatial strategy, potential changes to existing Core Strategy adopted policy to deliver growth in rural areas, consideration of potential development sites adjacent to Principal Settlements and Market Towns and the Council's emerging climate change and carbon zero policy approach.

No options for emerging development management policies have been published by the Council nor has a list been provided, stating which existing development plan document policies will be retained, which will be reviewed and which will be superseded.

The first full draft of the Wiltshire Local Plan Review is understood to be completed toward the end of 2021 with the first opportunity for the development industry to comment on the Local Plan Review in its totality, including any draft policies on the Council's publication of a Regulation 19 Submission version of the plan.

The soundness of this approach is questioned as the Council has not provided an opportunity for comment on a full draft plan or on emerging development management policies.

Plan Period

The WLPR has a published plan period of 20 years from 2016 -2036.

Paragraph 2.4 of the LDS (July 2020) states;

"The Wiltshire Local Plan Review DPD will provide the strategic context for development up to 2036 and determine the level and direction for future growth. It will include the allocation of a range of sites to meet the identified need for homes and jobs, a review of existing development management policies, and strategic guidance for the preparation of neighbourhood plans." (emphasis added)

The LDS is clear that the WLPR is the development plan document that will provide the strategic context for Wiltshire.

The National Planning Policy Framework (NPPF) provides guidance on the content of development plan documents and states at paragraph 17 that;

"The development plan must include strategic policies to address each local planning authority's priorities for the development and use of land in its area" (Section 19(1B-1E) of the Planning and Compulsory Purchase Act 2004).

Paragraph 20 of the NPPF sets out those matters that strategic polices should address, including making sufficient provision for housing. Paragraph 22 of the NPPF states that;

"Strategic policies should look ahead over a minimum 15 year period from adoption, to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure." (emphasis added)

The National Planning Practice Guidance (PPG) states that;

"The National Planning Policy Framework is clear that strategic policies should be prepared over a minimum 15 year period and a local planning authority should be planning for the full plan period."¹

The LDS states that the WLPR, which will contain strategic policies, should be adopted in Q.1 of 2023. This means that the plan would be adopted 7 years after the start of the plan period which would mean very limited development until after the plan end date for many rural settlements because of delivery between 2016 and the LPR adoption date (see Table 2.3 in Empowering Rural Communities consultation document).

At best a 15 year plan period from Q.1 2023 would run until Q.1 2038 and adoption could be further delayed owing to the need for main modification consultation post Examination Hearing Sessions which would extend the potential plan period even further.

Pegasus consider that the plan period for the WLPR should be reviewed to allow for a minimum of 15 years from adoption in accordance with national planning policy guidance. It is noted however that the plan is predicated on the delivery of a significant quanta of highway infrastructure proposed to be delivered to implement the spatial strategy at Chippenham and other Market Towns along the A350.

The preferred plan period is therefore 2020-2040, a 20 year rather than 15 year plan period.

Housing need for the revised plan period should be re-assessed and planned for accordingly, including any strategic allocations considered necessary at market towns or local service centres or large villages, or where local communities may not be progressing Neighbourhood Plans in order to ensure delivery of housing needs in the plan period in accordance with the emerging spatial strategy.

Housing Requirement

The identification of a housing need greater than the minimum Local Housing Need is supported however the NPPG does not set any limitations on a higher figure, which is a matter of judgement. The proposed housing requirement of 2,282 dwellings per annum is just 182 dwellings per annum greater than the current Core Strategy adopted housing requirement of 2,100 dwellings per annum. While it is greater than the minimum Local Housing Need it is below previous completion figures identified in the 2020 Housing Delivery Test and therefore represents a "business as usual" scenario rather than a 'significant boost to the supply of homes' as required by the NPPF.

The Council's housing requirement should be expressed as a minimum figure.

Duty to Cooperate

The LDS (July 2020) states at paragraph 2.10 that a Statement of Common Ground (SoCG) has been prepared to;

"....confirm the extent of joint working between the two authorities, and includes agreement that:

¹ PPG Plan Making - Paragraph: 064 Reference ID: 61-064-20190315 Revision date: 15 03 2019
<https://www.gov.uk/guidance/plan-making>

(i) Based on current evidence, the proposed housing and employment needs for Swindon Borough Council and Wiltshire Council can be accommodated within each authority's boundaries; and
(ii) Further information is needed to understand transport implications of the emerging development strategies of both plans to identify infrastructure provision to support growth."

No current, draft or emerging SoCG has been published as part of the WLPR consultation to evidence progress being made on the Duty by the two authorities.

The PPG requires authorities to evidence their Duty to Cooperate throughout the plan making process and states that it cannot be addressed retrospectively after submission.²

Since Wiltshire and Swindon ceased working on a Joint Strategic Framework post 2017 no evidence has been published by either authority as part of the plan making consultation process to evidence compliance with the Duty to Cooperate. This matter goes to the heart of the legal compliance of the plan.

Chippenham Housing Market Area

Pegasus object to the approach that has been taken with regard to the decreased percentage of housing development proposed at Malmesbury within the Chippenham Housing Market Area in the plan period compared to the percentage allocated to the market town under the adopted Core Strategy.

As described in the consultation documents this would effectively mean no new WLPR led housing development beyond existing commitments at the only Market Town in Wiltshire north of the M4 up to 2036. There would be scope for the Neighbourhood Plan to make allocations on brownfield sites or to meet local needs, however if the minimum housing requirement for Malmesbury had already been met there would be no incentive for the local community to review their Neighbourhood Plan.

Malmesbury is a thriving market town serving a wide rural hinterland with good services and facilities including a secondary school, recently constructed medical centre and thriving local community. The Town is also home to Dyson engineering, including the Dyson Institute of Engineering and Technology. A review of the Dyson website on 1st March 2021 demonstrates that Dyson are currently advertising 140 jobs at their Malmesbury³ site and 23 jobs at their Hullavington⁴ site (located between the M4 and Malmesbury).

Given one of the aims of the WLPR is to improve self-containment within Wiltshire by seeking to balance homes and jobs the emerging spatial strategy will not achieve this at Malmesbury where an innovative international engineering company is based and is currently actively recruiting for new staff. Without new homes at the town these staff will be reliant on commuting to and from the town, increasing traffic congestion and contributing to air pollution. New homes at the town would allow for employees to walk and/or cycle to the Malmesbury and Hullavington Dyson sites as well as to the new Aldi convenience store currently being constructed to the north of the town which will provide a further 30 new jobs⁵.

The NPPF is clear at paragraph 8 that the planning system is to deliver sustainable development based on three interdependent objectives; an economic objective; a social objective and an environmental objective. Not planning for new housing growth at Malmesbury prejudices the delivery of the social objectives of NPPF para 8 and of the emerging WLPR to ;

"support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations"

² PPG Plan Making - Paragraph: 031 Reference ID: 61-031-20190315 Revision date: 15 03 2019

<https://www.gov.uk/guidance/plan-making#statutory-duty-and-the-role-of-plans>

³ <https://careers.dyson.com/en-gb/search-results/?q=Malmesbury>

⁴ <https://careers.dyson.com/en-gb/search-results/?q=Hullavington&page=1&minpage=1&maxpage=1&sort=Score>

⁵ <https://www.wiltsglosstandard.co.uk/news/19042690.work-begins-new-supermarket-malmesbury/>

Not providing additional new homes at Malmesbury up to 2036 means that the supply of new affordable homes at the Market Town will be severely constrained, that self-containment would not be enhanced, and that the community would be misled concerning new development should the authority find themselves without a 5-year housing land supply. In such a situation sustainable new development at the Market Town would need to be considered in the context of the tilted balance in accordance with paragraph 11d of the NPPF.

This matter is explored further in response to the Planning for Malmesbury consultation documents.

Swindon Housing Market Area

Pegasus support the emerging spatial strategy approach taken by the WLPR with regard to the location of new homes in the Swindon Housing Market Area. This approach, as further described in the 'Empowering Rural Communities' consultation documents provides an indicative minimum housing requirement for the Local Service Centre of Cricklade and the Large Villages of Aldbourne, Baydon and Purton where our client has land interests.

Review of Settlement Hierarchy

It is noted that the WLPR simply roles forward the settlement hierarchy from the Core Strategy without undertaking any review of how the existing settlement hierarchy is performing or whether it is delivering the right homes in the right places.

Pegasus consider that there is a case to be made for Cricklade to be re-categorised from a Local Service Centre to a Market Town in the settlement hierarchy, owing to the services and facilities found at the town and its capacity to accommodate future growth. Moreover, the only other market Town to the north of the M4 in Wiltshire, Malmesbury, is already considered to have met its plan making plan period minimum housing requirement owing to the current level of commitments at the Town.

This matter is considered further in response to the Empowering Rural Communities consultation paper.

The Brownfield Target

The document states that where Neighbourhood Plans are being prepared or reviewed in parallel to the WLPR, that identified brownfield sites can be included in the housing land supply and a corresponding amount of land can be removed from the residual housing requirement, thereby reducing the need to allocate greenfield land.

However, any identified brownfield sites should be robustly tested against the NPPF's definitions of 'deliverable' and 'developable' if they are to be included as part of an authorities housing land supply. A brownfield target is to be introduced for designated Neighbourhood Areas at main settlements, including Malmesbury.

However, there is inconsistency in the Council's approach for the following reasons;

1. Housing requirements are based on housing need, while the brownfield target is based on past delivery from previously developed land (over which there is no guarantee of new supply as PDL is a finite resource)
2. There is no methodology proposed for calculating housing requirements for designated neighbourhood areas outside the main settlements
3. The brownfield target appears to cover the period 2021-2031 while the housing requirement currently covers the period 2016-2036 (although it is requested above that this be amended to 2020-2040)
4. Brownfield sites would therefore represent short to medium supply sites on adoption of the plan and must therefore be evidenced through examination of the WLPR to be NPPF 'deliverable' not 'developable'.
5. To date no brownfield sources of supply have been published by the Council or through Neighbourhood Plans to be reviewed or tested in terms of the capacity of the supply being able to meet identified housing requirements in the short to medium term.

The NPPF (2019) approach to making best use of land is not a sequential approach to the use of brownfield land for the purposes of plan making. The Council should not therefore propose artificially phasing the construction of large greenfield sites to ensure a priority is maintained on brownfield land.

I wish to be notified of any future updates relating to the Local Plan Review:

YES:

NO:

Clicking yes will add you to the planning policy contact database. This will mean you are kept informed of any future planning policy updates and consultations.

Further information on how the Spatial Planning Department treats your personally identifiable information can be found by reading the privacy notice available via the link below:

<https://www.wiltshire.gov.uk/planning-privacy-notice>

Here you will also find information about how and why your data may be processed and your rights under the Data Subject Information Notice section further down the page.

Signature:

Date:

08.03.21

Thank you for completing this form.

Data Protection

Wiltshire Council has a duty to protect personal information and will process personal data in accordance with Data Protection legislation. The personal data you provide on this form will only be used for the purpose of the Wiltshire Development Framework. It may also be used for the prevention or detection of fraud or crime and in an anonymised form for statistical purposes. The data will be stored on computer and/or manual files. You have a right to a copy of your information held by any organisation, with some exemptions. To gain access to your personal data held by Wiltshire Council or if you have any Data Protection concerns please contact Wiltshire Council's Data Protection Officer on 01225 713000 (switchboard) or e-mail to dataprotection@wiltshire.gov.uk ."

STRAT197b

LF/P19-1888

8th March 2021

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

By email: spatialplanningpolicy@wiltshire.gov.uk

Dear Sir/Madam

Wiltshire Local Plan Review Regulation 18 Public Consultation Representations submitted on behalf of Hannick Homes and

Pegasus Group are please to submit representations on behalf of Hannick Homes and Developments Ltd to the Wiltshire Local Plan Review Regulation 18 public consultation.

This submission letter is accompanied by three representation forms relating to the;

- Emerging Spatial Strategy
- Planning for Malmesbury consultation documents
- Empowering Rural Communities consultation document

The representations are accompanied by the following appendices;

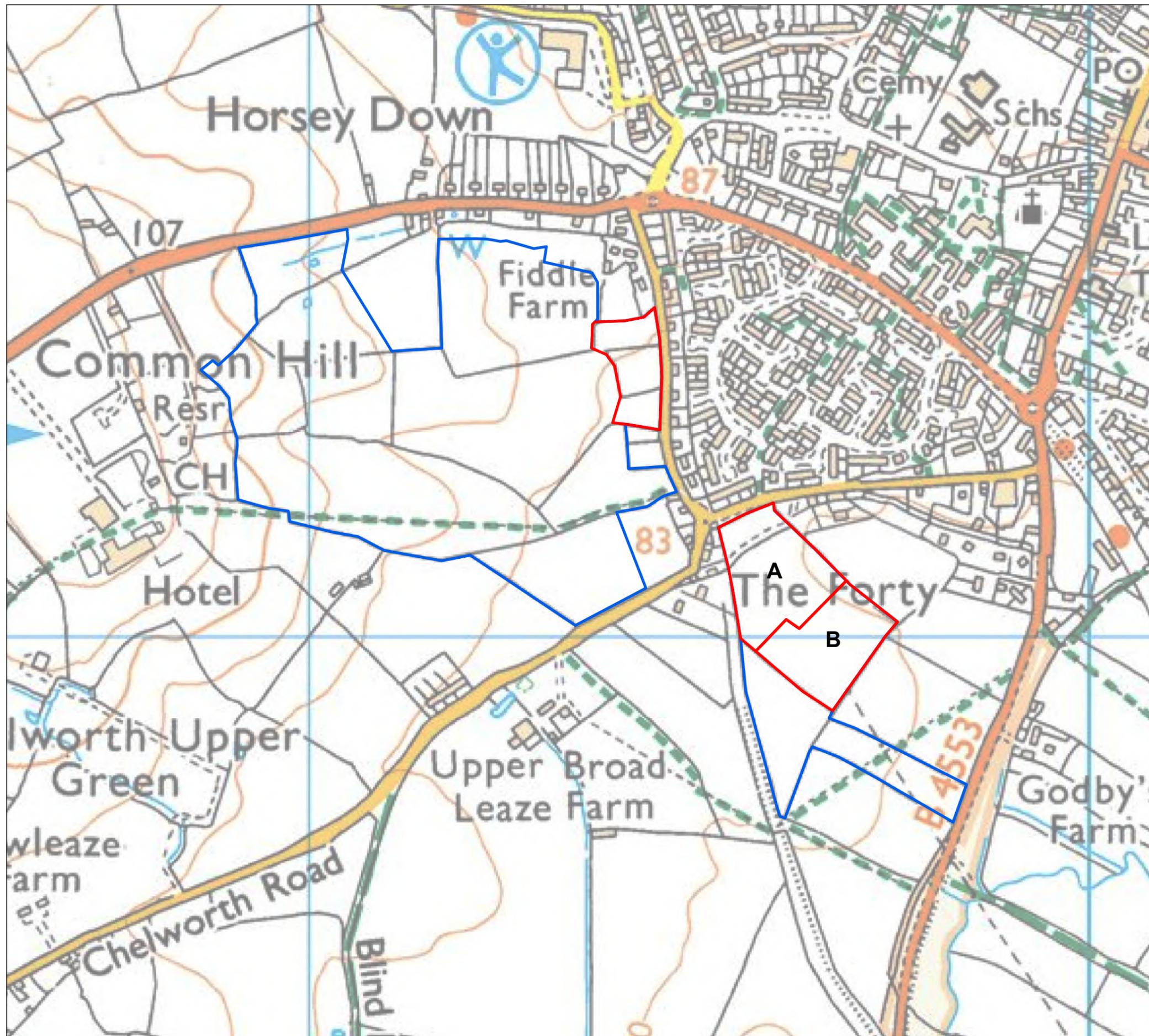
Appendix 1 – Malmesbury Indicative Layout Plan
Appendix 2 – Cricklade Site Plan
Appendix 3 - Baydon Site Plan
Appendix 4 – Lottage Farm Site Plan
Appendix 5 – Lottage Farm Illustrative Masterplan
Appendix 6 – Purton Site Plan
Appendix 7 – Minety Site Plan

I would be most grateful if you could please confirm receipt of these representations.

I look forward to hearing from you with regard to these matters,

Yours faithfully,





KEY

- Land Promoted to Neighbourhood Plan
- Additional Land Available in Same Ownership

Revisions:
First Issue- 08/03/2021 JS

Hannick Land Availability at Cricklade

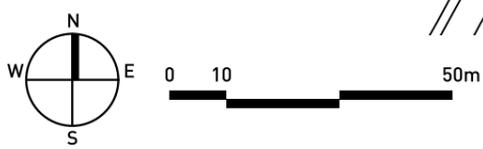
Wiltshire Local Plan Review

Client: Hannick Homes and Developments Ltd
 DRWG No: **P19-1888_01** Sheet No: - REV: -
 Drawn by: JS Approved by: LF
 Date: 08/03/2021
 Scale: 1:5,000 @ A3





Copyright Pegasus Planning Group Ltd. Crown copyright. All rights reserved. Ordnance Survey Copyright Licence number 10002083. Promap. Licence number 100020449. EmapSite Licence number 0100031473. Standard OS licence rights conditions apply. Pegasus accepts no liability for any use of this document other than for its original purpose, or by the original client, or following Pegasus' express agreement to such use. T 01285 641717 www.pegasusgroup.co.uk



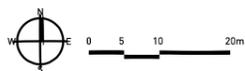
LOTTEGE ROAD, ALDBOURNE - SITE LOCATION PLAN



- ① POTENTIAL PEDESTRIAN/CYCLE CONNECTIONS TO EXISTING ROUTES
- ② NEW BUFFER HEDGEROW
- ③ MAIN ACCESS INTO THE SITE
- ④ NEW HEDGEROW FIELD BOUNDARY
- ⑤ RETAINED AGRICULTURAL ACCESS



Copyright Pegasus Planning Group Ltd. Crown copyright. All rights reserved. Ordnance Survey Copyright Licence number 10002083. Promote Licence number 100020449. EmapSite Licence number 0100031473. Standard OS licence rights conditions apply. Pegasus accepts no liability for any use of this document other than for its original purpose, or by the original client, or following Pegasus' express agreement to such use. T 01285 641717 www.pegasusgroup.co.uk



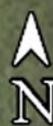
LOTTAGE ROAD, ALDBOURNE - ILLUSTRATIVE MASTERPLAN

Pegasus
Design





Minety



STRAT199

Comments by Wiltshire Ramblers on Wiltshire Local Plan consultation document

Wiltshire Ramblers are very disappointed that there is not one mention, as far as we can see, of Public Rights of Way (ProW) in any of the constituent documents comprising the consultation document.

The paragraph in the succinctly named '**Addressing Climate Change and Biodiversity Net Gain through the Local Plan - raising the ambition**' paper in which we would have expected PRowS to be considered is 4.6. In this paragraph five themes are identified for closer investigation and evidence gathering, and theme 5, 'Promoting sustainable transport, active travel and air quality' is the relevant one. This gives rise to Consultation Question B13, 'What practical policy steps should the Local Plan take to significantly increase modal shift to public and active transport, and speed up the transition to greener fuelled vehicles?'

The Wiltshire Core Strategy (which it appears is to be superseded by the Local Plan) envisaged supporting improvements to the PRow network, but was vague about how this should be done. There has been a great deal of publicity over recent months about encouraging 'Active Travel', that is walking and cycling locally rather than going by car. This is envisaged to lead to substantial reductions in carbon emissions. However this will not be achieved without a significant amount of investment, especially if it is intended to see results by 2030, which is only nine years away. This will need to be done by optimising car free routes between towns and villages, and integrating these with public transport.

Wiltshire's vast network of PRowS – there are nearly 4,000 miles of these – invites many possible choices for Active Travel routes, but there are enormous obstacles to be overcome:

- 1) Wiltshire's PRowS are a legacy of the 1940s and 1950s, so any of them identified as being appropriate for Active Travel routes are likely to need rationalisation and upgrading to make them attractive enough to persuade car drivers that they can be used as an alternative

- 2) The choice of routes to be nominated for Active Travel will entail local research and consultation, through Parish Councils and interest groups
- 3) There will inevitably be objections and legal challenges from local residents and landowners to overcome
- 4) The health and climate emergency gains of Active Travel will require a great deal of ongoing publicity and campaigns to retain support
- 5) Routes should be compatible with local bus services, and their providers' coordinated publicity sought

There are obvious difficulties in implementing this programme, the most pressing of which is that the present Countryside and Rights of Way department has the expertise but is woefully short of staff that could supervise it. The department has suffered from almost continuous cuts to its budget since the austerity programme began in 2010, and appears to be the last in a long line of Council departments when considering its relative importance and need for additional funding. There are at present only 6 Countryside Access Officers to attempt to deal with the very high volume of path problems being reported by the walking public - some 1400 since September last year, we understand, not to mention the number of path problems accumulated up to then.

Although it is our experience that the Countryside Access Officers do an outstanding job given the meagre resources at their disposal, this staffing level is clearly hopelessly inadequate. An early reassessment of the department's staff requirements should be made to enable it to support Active Travel in a meaningful way so as to produce tangible results by 2030. If this is done it will also take the department a long way towards being able to fully address the key issues set out in paragraph 8.2 of the Council's Countryside Access Improvement Plan 2015-2025.

The health benefits of walking are well known and have been proven by many studies; the need for the public to be able to use PRowS safely has been highlighted by the covid-19 pandemic, and yet their continued existence seems to be taken for granted. But unless steps are taken to restore the network at least to the condition it was in before the austerity campaign began, many PRowS will deteriorate to the point that they will become unusable, and indeed this has already happened to far too many of them.

The Slow Ways project, which we enthusiastically support, seeks to get the public out walking on the PRoWs which connect local communities together. This is just the kind of initiative which should greatly reduce the number of car journeys taken, and thus contribute significantly to achieving the objectives of the Council's Climate Change plan, but it will also put vastly increased pressure on our PRoWs, and may even lead to accidents unless something is done urgently to address the lamentable deficiencies in or network of PRoWs.

We note that there is no mention of PRoWs in CP (Council Policy, presumably?) 52 in Appendix 1. This "seeks to maximise the retention and enhancement of Wiltshire's green infrastructure"; what could be greener than its extensive network of PRoWs? CP 53 "seeks to safeguard the historic routes of Wiltshire's canal network with a view to its long-term re-establishment as navigable routes". Whilst this is indeed a laudable objective, this network is a microcosm of the RoW one, which seems to have somehow avoided any mention in the Plan. CP63 is that "Packages of integrated transport measures will be identified in Chippenham, Trowbridge and Salisbury", with the first of these to "consider the implementation of...new and improved networks of routes for pedestrians and cyclists". This is all well and good, but how about considering the thousands of miles of such networks outside these towns?

The Plan's **Emerging Spatial Strategy's** side document is its **Empowering Rural Communities** paper, and both are supported by the **Transport Review** undertaken by Atkins. We have no specific comments to make on these papers, other than to request that developers should be required to pay due care and attention to PRoWs affected by their plans, rather than treating them as an irritating distraction to be considered only as an afterthought. Ideally, of course, they should be required not only to retain PRoWs but to improve them if at all impossible, and to ensure that they continue to connect with the rest of the PRoW network. Paragraphs 59 to 69 of the **Empowering Rural Communities** paper deals with Neighbourhood Plans. We believe that these should be required to consider how to maintain and enhance the PRoWs within their jurisdiction.

Paragraph 3.2 of the **Transport Review** discusses the 'Walking and Cycling mitigation measures' to be adopted in the three largest communities of Chippenham, Trowbridge and Salisbury, however walking as a stand alone

activity is not mentioned at all. The intention seems to be that walkers will share the urban, tarmac cycling routes with cyclists, but this has safety implications. As a minimum, there need to be clearly marked lanes for cyclists and pedestrians to use, with both being wide enough (at least 1.5 m) to lessen the risk of collisions. Furthermore we think that it should be a requirement for the local authority to erect signs along such routes reminding cyclists to ring their bells or alert walkers to their approach, which should reduce the likelihood of accidents occurring.

We note that the creation of cycle tracks in urban areas can cost several million pounds, and wonder why some of this funding could not be spent on maintaining and improving the county's PRowS instead?

Appendix D1 of this review consists of a plan of the proposed Melksham bypass. The Ramblers were consulted recently by a Transport Planner working in a team delivering 'GG142 Walking, cycling and horse-riding assessment' of the bypass plan, and our comments are attached as an appendix to this response. We are anxious that these are fully considered well before the scheme is finalised. We strongly recommend that the Plan should make it clear that major transport infrastructure schemes should not allow major highways and railways to divide communities unless suitable crossing points are provided to retain the coherence and unity of local communities.

Finally we set out below our comments on the individual **Planning for...** papers for some of the principal towns in Wiltshire. Please note that the absence of comment on the housing site proposals for some of the towns should not be taken as implying that we necessarily agree with them.

Our comments relate to the sites which have been designated as potentially suitable for housing development during the Plan period. We are not commenting on the other aspects of the Plan.

Planning for Marlborough

Site 1. No objection.

Site 2. No objection provided the higher ground is retained as open space, as is the case with the existing Salisbury Road development which it adjoins.

Sites 3 & 4. With the exception of that part of Site 3 which is included in the Marlborough Neighbourhood Plan we do not consider these sites suitable for development and therefore object to their inclusion. There would be an adverse impact on the whole of bridleway PRES32 as well as parts of MARL1 and PRES27 (the White Horse Trail). PRES32 affords good views across the valley to Granham Hill. The sites' elevation means that housing development would be a prominent and unattractive feature in views from south of the A4, looking north towards the downs.

Planning for Royal Wootton Bassett

Site 3 – Maple Drive. With the exception of the square field immediately north of the school playing fields (SHELAA 3160), on which development may be acceptable, we object to the inclusion of this site. It is unsuitable for development by reason of its proximity to Jubilee Lake and the surrounding woodland. Footpath WBAS108, which runs down the western boundary and gives excellent views to the west from its elevated position, has a strong rural feel and one section is notable for its variety of wild flowers in summer.

Site 4 – Whitehill Lane. No objection provided the northern part of the site is reserved for a town park as set out in the Royal Wootton Bassett Neighbourhood Plan.

Sites 5 & 7 – South of RWB. We object to the inclusion of these two sites. The Wilts & Berks Canal when fully restored should continue to run through the countryside as it always did and should not become an urban waterway. The inclusion in Site 5 of land west of Breach Lane, which is at a higher level, would also have an adverse impact on the countryside.

Another important consideration is that, to be sustainable, any housing development south of the railway would need additional pedestrian and cycle routes to be created across the line. The electrification of the line has made the construction of new bridges more difficult. As an example of this we understand that Network Rail wish to close the surface crossing on footpath WBAS28 and have said that the gantries prevent a footbridge being put in here. We believe there is a strong case for treating the railway line as the southern boundary of the town's development area, with the exception of sites immediately adjoining Marlborough Road.

We have no objection to the remaining sites.

Planning for Tidworth and Ludgershall

The documents state that, of 1555 additional homes assessed as being needed in these two towns in the period up to 2036, only 165 require new land to be identified. Since this number is so small we do not understand why so many sites have been included.

Site 1. The northern edge of this site touches the boundary of the AONB. The ground levels are also higher than the developed area of the town to the south. We therefore believe that any development should be restricted to the southern part of the site.

Site 4. Given the relatively small number to new homes to be accommodated, as referred to above, we see no justification for including a site which covers such a large area of countryside. Any development on this site should be restricted to the north-east corner of the site, close to the A342. Development of the rest of the site would be disproportionate to the size of Ludgershall and would deprive many residents of easy access to countryside walking.

Site 5. No objection subject to the woodland being retained.

We have no objection to any of the other sites.

Planning for Salisbury

We have no specific comments on the plan, but note that the overriding impression given by it is the lack of emphasis on improvements in greener travel infrastructure, and any obvious plan to manage the inevitable increase in traffic, which is barely alluded to.

Whilst there is some evidence of thought given to pedestrian access in proposed new developments, there is no overriding guiding principle of improving the quantity and quality of footpath and cycle routes to comprise an enhanced network across the city.

Planning for North West Wiltshire

North West Wiltshire has been divided up by major roads – notably the M4, A350, A429, A420, A4 and the new north Chippenham spine road. With the proposed future Chippenham routes traffic will only increase.

The effect of the major roads is to restrict the ability to walk north to south and east to west, reducing many footpaths and bridleways to dead ends. Many of these are now obstructed, overgrown and unsigned. Parts of these major roads have no footway which prevents them being used to walk between settlements or to join up with the PRow network.

With further ‘improvements’ to trunk roads the situation can only deteriorate further. There are many large roundabouts on these routes which present significant barriers to pedestrians, cyclists and equestrians.

A429 – there is only one pedestrian refuge (at Lower Stanton St Quintin) between the M4 and Malmesbury – in 8km of road. There are only short sections of pavement, usually within settlements, so it is often impossible to walk from one to the next (as there are ditches on either side of the road).

A350 – there are pedestrian crossings only at Lacock, Frogwell (Chippenham Rugby Club), Malmesbury Road and Plough Lane – that is four safe crossings in over 12km of road. The road often has wide verges but they are mainly too rough to walk along.

A420 – there are no safe crossing points between the county boundary and the Hathaway medical centre, a distance of 11.2km. Again the road often has wide verges but they get overgrown in summer and as a result become impassable.

A4 – there is no footway between Corsham and Chippenham, a distance of 2.3km. On the Pewsham Way bypass, the pedestrian refuges do not align with the rights of way; between Stanley Lane (access to Abbeywood School) and the new pedestrian crossing at Derry Hill, there are no safe crossing points, a distance of 3.3km. There is a footway between Pewsham and Derry Hill and on to Calne, but it changes from one side of the road to the other at Chilvester Hill with no safe crossing, and there is a missing section between Greenacres Way and Springfields Academy, a distance of 170m). There is a footway along most of the A4 from Calne to Beckington, except for a 730m section north of the White Horse plantation. The footway from BANES County boundary into Box is missing a 0.5km section through Box Hill. It then resumes to Corsham.

The first section of the North Chippenham Spine road crosses three footpaths, and it was only through campaigning that one pedestrian refuge was created on the route.

The M4 is crossed or underpassed by 12 roads, 6 bridleways, 2 footpaths and 1 track. It truncates 4 bridleways, 7 footpaths and 1 cycleway. Some footpaths have been rerouted to other crossings, leading to 3 diversions of over a kilometre, and one of 2 km.

Appendix to Wiltshire Ramblers comments on Wiltshire Local Plan

General requirements

1. All current Rights of Way (RoW)s – which are numerous - to be maintained [see detail below]
2. Crossing points to have adequate bridge or underpass
3. Underpasses to have adequate drainage as land generally low lying
4. All non-vehicular routes to be tarmac where possible to protect against erosion from usage
5. Wilts & Berks Canal towpaths – actual and likely - to be linked in where possible
6. A new RoW adjacent to the bypass would be useful in linking routes N to S
7. Option 10d would be too environmentally damaging and make little sense in terms of work involved
8. RoWs to be of adequate width to allow for multipurpose use – cyclists, horse-riders and walkers
9. Stiles to be eliminated and replaced with kissing gates to allow for wider community use – this will have a positive impact on health

Specific requirements

1. Travelling from N to S, these are the RoWs crossed, which are all footpaths except where otherwise mentioned –

MELW 66, 61, 47, 26, 4 [Bridleway], 22, 23, 24, 35,
SEEN18, 13 [Bridleway], 17 [Bridleway]
MELW 42. See

<https://wiltscouncil.maps.arcgis.com/apps/webappviewer/index.html?id=43d5a86a545046b2b59fd7dd49d89d22>

for where exactly these RoWs are.

2. Footpath improvement – probably additional – from Melksham Oak school to the new estates on the east side of Melksham thereby diverting more pupils away from the unhealthy aspects of the Melksham – Devizes A365 main road
3. Traffic calming on Lower Woodrow [SE of Queenfield Farm] would be a good idea as it is a horsey area
4. A RoW link between footpath MELW26 and Bridleway MELW40 would be a good idea to enable safer circular walking
5. A linking RoW alongside the new road bridge from north of Beanacre would be a very useful W-E link in the north

Observations

1. Somewhere in the blurb on one of the options it mentions about 1 bridge being required. This is not correct. There are at least 3 – being the crossing of the line of the Wilts & Berks Canal – probably just to the south of Queenfield Farm. The canal is being restored. Then Clackers Brook to the east
2. There is likely to be a wiggle in the bypass at Sandridge to pass between two sets of main farm buildings – Blackmore and Manor. To go east Manor Farm would involve going over higher ground and much earth relocation as well as slicing through a solar farm
3. Suggest further dialogue with Melksham Without PC