

**STRAT352**

Land at Swan Road, Pewsey  
Wiltshire

# Vision Document

March 2021



**“THE LAND AT SWAN ROAD PRESENTS AN EXCELLENT OPPORTUNITY FOR A SENSITIVE, LANDSCAPE LED SUSTAINABLE RESIDENTIAL EXTENSION TO PEWSEY. USING THE RIVER AVON AS A CENTREPIECE FOR A NEW LINEAR PARK, NEW NEIGHBOURHOODS CAN SIT WITHIN A COMPREHENSIVE LANDSCAPE AND OPEN SPACE NETWORK, WHILST BEING WITHIN WALKING DISTANCE OF THE AMENITIES AND SERVICES IN CENTRAL PEWSEY.”**

**Carter Jonas**

The Paul Bowerman Discretionary Trust: Land at Swan Road, Pewsey, Wiltshire

# Contents

<b>1</b>	<b>Introduction</b>	<b>6</b>
1.1	Purpose of the Document	8
1.2	Document Structure	8
<b>2</b>	<b>Site &amp; Context</b>	<b>10</b>
2.1	Location	12
2.2	Community Facilities & Accessibility	14
2.3	Planning Background & Policy	16
2.4	Technical Considerations	17
2.5	Overall Considerations Plan	18
<b>3</b>	<b>Design</b>	<b>20</b>
3.1	Vision	22
3.2	Principles	22
3.3	Concept Plan	24
<b>4</b>	<b>Summary</b>	<b>26</b>
4.1	Conclusions & Key Benefits	28

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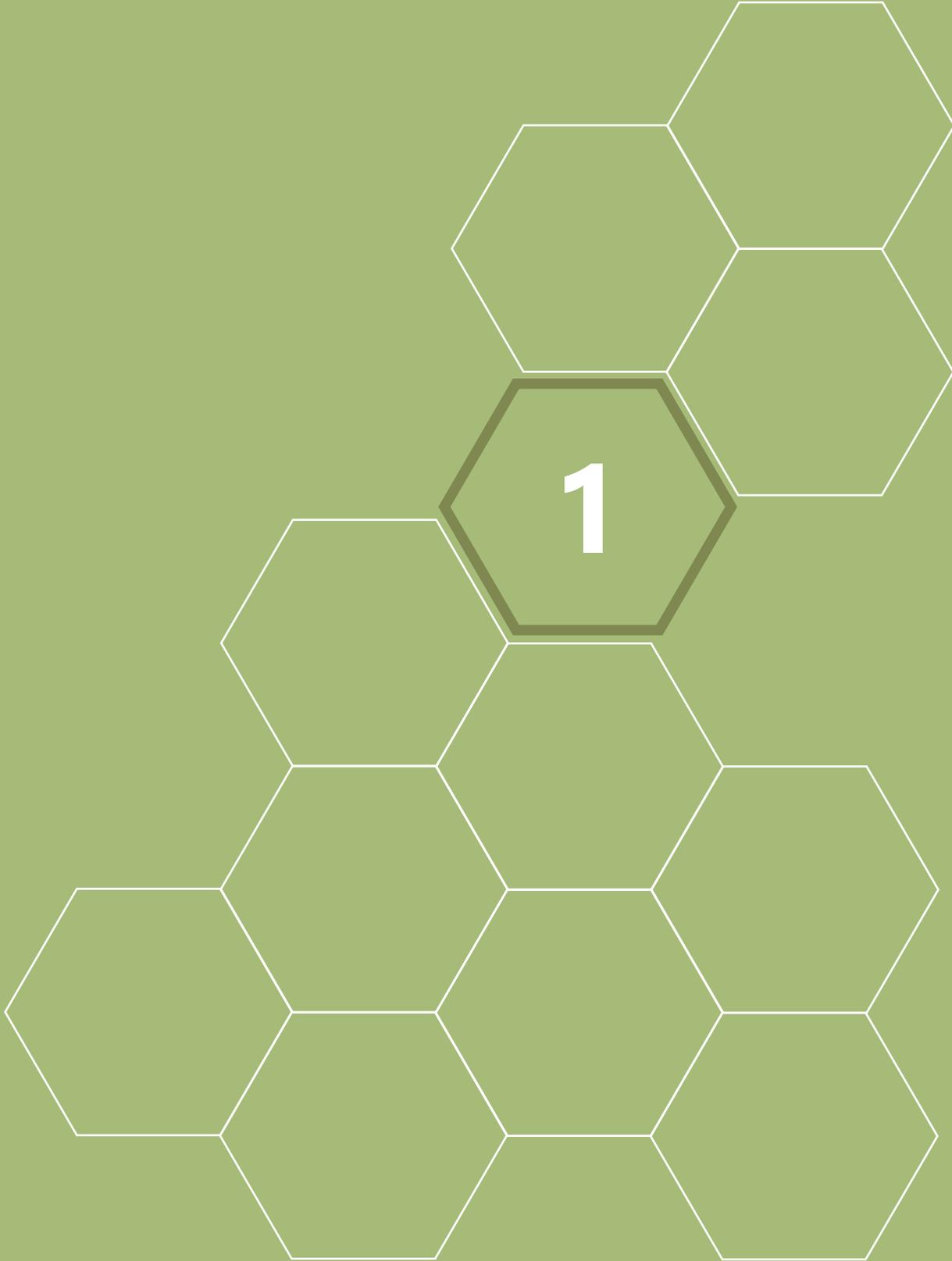
**Fig 01:** View of the River Avon running through the Site



# 1.0 Introduction

1.1 Purpose of the Document

1.2 Document Structure



# Introduction

## 1.1 Purpose of the Document

**Carter Jonas has been instructed by Paul Bowerman Discretionary Trust and PH Bowerman Esq to promote the Site known as Land at Swan Road ('the Site'), Pewsey for residential-led development through the Local Plan Review process being undertaken by Wiltshire Council.**

**As demonstrated in this document, the Site represents an opportunity to deliver a sustainable, distinct and well-connected new neighbourhood reflecting the logical direction of growth at Pewsey.**

The document will:

- Illustrate the process that has led to the development proposal and explain the design principles and concepts that have been applied.
- Introduce the concept masterplan and explain the rationale behind its development.
- Set out a high level vision and broad design principles.
- Explain and confirm why the Site is available, suitable and deliverable and should be considered for development.
- Enable positive engagement with the local community and Wiltshire Council

## 1.2 Document Structure

The document is structured as follows:

### **Section 1: Introduction**

Describes the purpose of the document, content and scope.

### **Section 2: Site & Context**

Provides an overview to the Site and a summary of the Site's key characteristics, including a summary of the technical work undertaken to date, which will inform the concept design.

### **Section 3: Design**

Provides the vision for the Site and the key design principles, culminating in a conceptual masterplan.

### **Section 4: Summary**

Summarises the information presented in the document.

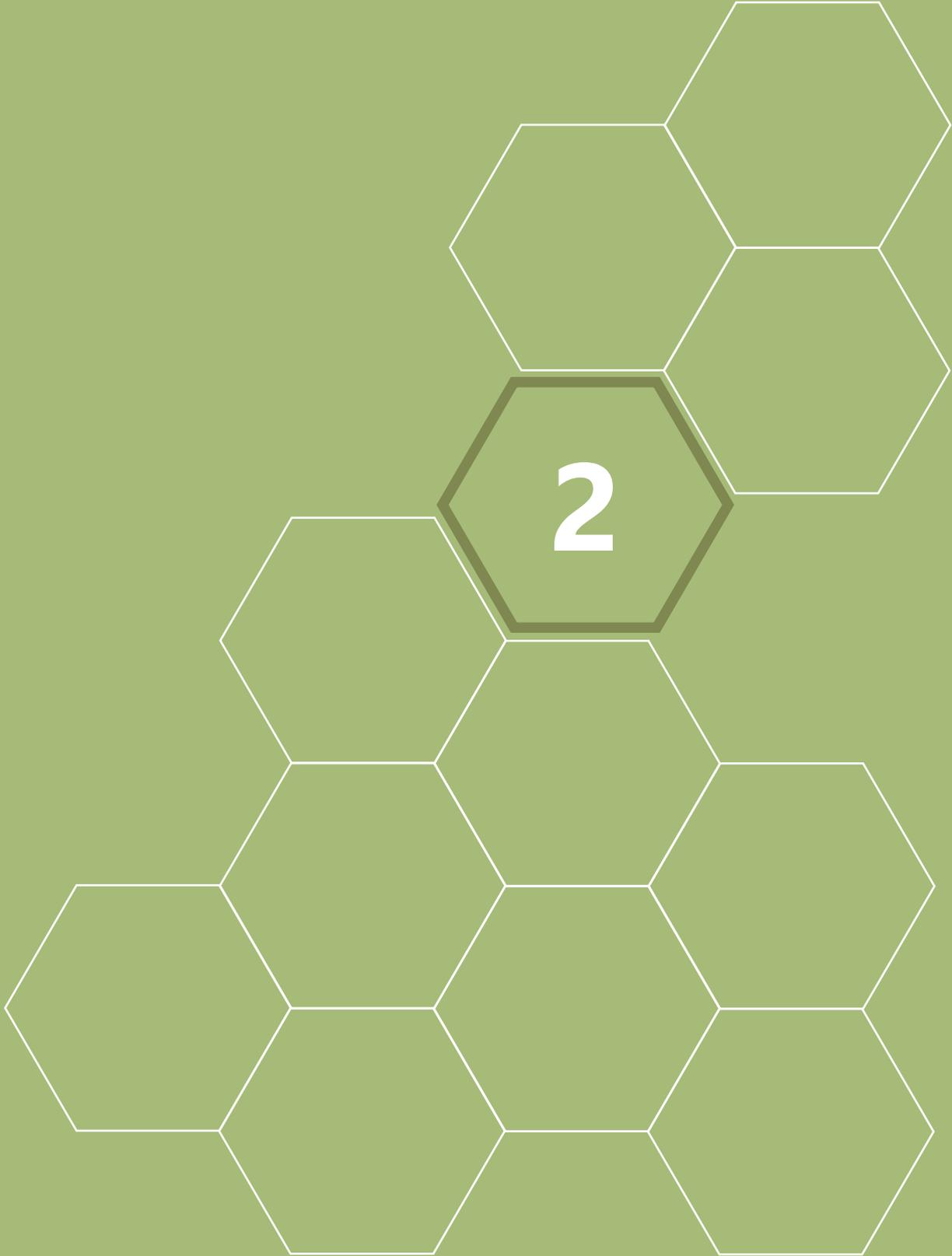


- 1 View from Salisbury Road towards existing trees surrounding current commercial building on Site
- 2 View towards existing properties close to the Site's south east corner, with the Site boundary shown on the left
- 3 The River Avon running through the Site
- 4 View along the public right of way along the Site's northern boundary showing existing properties on The Links
- 5 View south across the Site to existing mature trees along the River Avon
- 6 View south east across the Site towards Swan Road
- 7 View east along Church Street towards the centre of Pewsey showing St John's Church on the right

**Fig 02:** Existing Site photographs

## 2.0 Site & Context

- 2.1 Location
- 2.2 Community Facilities & Accessibility
- 2.3 Planning Background & Policy
- 2.4 Technical Considerations
- 2.5 Overall Considerations Plan



# Site & Context

## 2.1 Location

**The Site is located at the south western fringe of Pewsey, approximately 800m from the village centre. The Site area extends to approximately 71.78 acres (29.05 hectares).**

Pewsey is a large village situated within the administrative boundary of Wiltshire Council. It sits approximately 20 miles south of Swindon and 20 miles north of Salisbury.

The Site is bound to the south by the A345 (Salisbury Road), which also provides access to the Site. The Site is bound to the east by Swan Road and to the north existing residential development off “The Crescent”, to the north west by further agricultural land and to the west by a sewage treatment works and Salisbury Road Business Park.

The Site comprises greenfield agricultural land that is bisected by a number of mature hedgerows.

The topography of the Site gradually slopes downwards from the Site’s northern and southern boundaries, forming a shallow valley towards the River Avon and stream, which run east to west across the centre of the Site. A mature tree belt runs alongside the meadows that transect the Site.

The village is well situated between the M4 and A303 corridors has good transport links with the A345 linking the village to Marlborough (seven miles north). The village also benefits from Pewsey railway station on the Berks and Hants line served by intercity trains between London (Paddington) and the West Country.



 The Site (29.05 Ha)

**Fig 03:** Site location in Pewsey

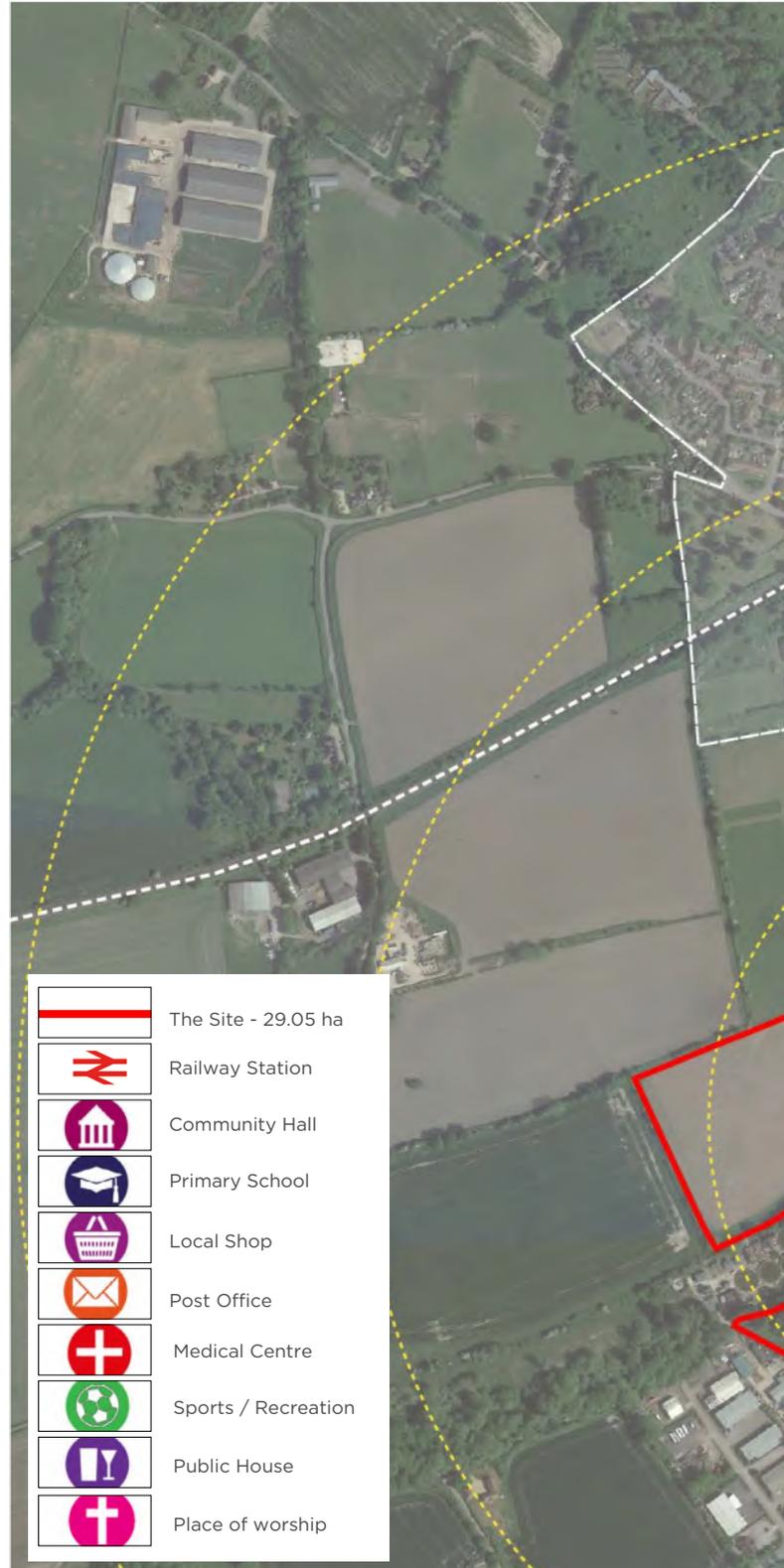


## 2.2 Community Facilities & Accessibility

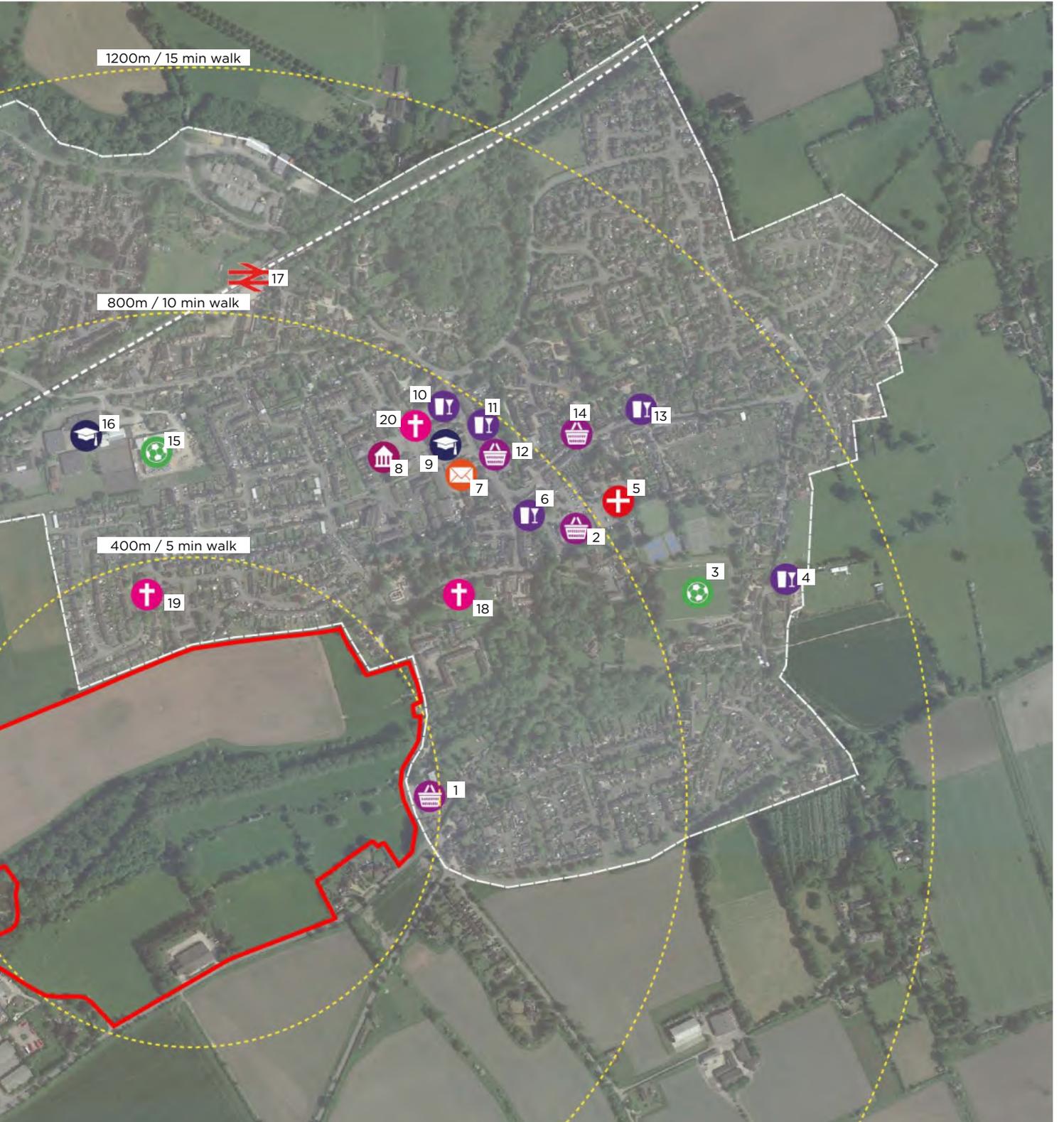
**The Site is well located to take advantage of and support the of local amenities and services in Pewsey village, most of which are within a 10 minute walk.**

The village has a full range of services, including a primary and secondary school, doctor's surgery, sports centre and various national and independent retailers, cafes and public houses. The key local services are listed below:

1. Esso Pewsey / Pewsey Vehicle Motorworks
2. Co-op food Pewsey
3. Pewsey Vale Football Club / tennis courts / bowls club
4. The Coopers Arms PH
5. Pewsey Surgery
6. Pewsey Vale Community Craft and Tea Room
7. Post Office
8. Bouverie Hall (community hall)
9. Pewsey Preschool
10. Royal Oak PH
11. The Shed Alehouse
12. SPAR Pewsey
13. Moonrakers PH
14. Boots
15. The Vale Community Campus (leisure & recreation)
16. Pewsey Vale School (Secondary School)
17. Pewsey Railway Station
18. St John's Church
19. Holy Family Catholic Church
20. Pewsey Methodist Church



**Fig 04:** Community facilities plan



## 2.3 Planning Background & Policy

**Wiltshire Council is preparing a Local Plan which will cover the period up to 2036. Consultation on the Council’s vision commenced in January 2021. This informal consultation sets out the scope and content of the emerging strategy.**

The minimum Local Housing Needs figure for Wiltshire is 2,042 dwellings per year, which yields an overall minimum housing figure of 40,840 dwellings over the Local Plan period 2016 - 2036.

Pewsey is not identified as a principal settlement and is therefore considered under the Empowering Rural Communities Document. Wiltshire Council’s Empowering Rural Communities document seeks to limit development in the open countryside. However, it identifies Pewsey as a Local Service Centre and furnishes the settlement with a baseline indicative housing requirement for the period 2016 to 2036 of 145 dwellings.

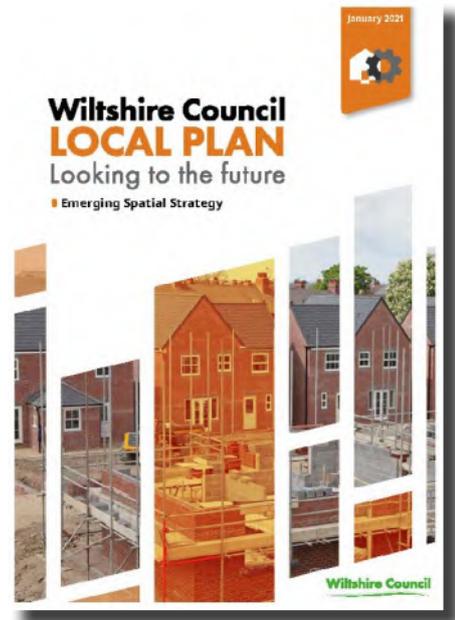


Fig 05: Wiltshire’s Emerging Local Plan

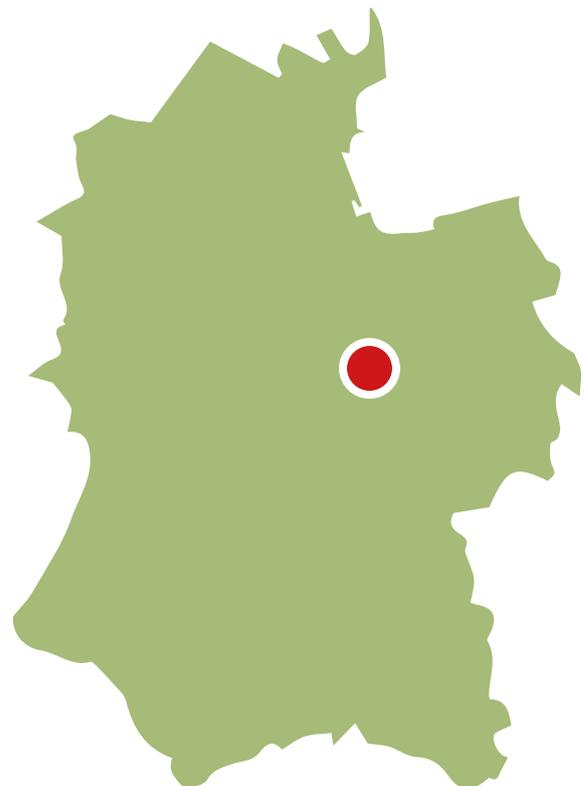


Fig 06: Location of the Site in Wiltshire

## 2.4 Technical Considerations

### Highways and Access

The Site is currently accessed from a number of locations:

1. A gated field access from Swan Road, north of the River Avon
2. A gated field access from Swan Road, south of the River Avon
3. A gated access associated with the existing commercial building on the A345 Salisbury Road on the Site's southern boundary

An initial access appraisal has been undertaken to review the opportunities available for access to the land. This concluded that access to the Site can be achieved via points onto Swan Road to the east of the Site and the A345 Salisbury Road to the south of the Site. A further access point could also be provided on Swan Road opposite the existing petrol station.

Swan Road is subject to a 30mph speed limit and Salisbury Road is subject to a 50mph speed limit.

The 30mph speed limit could be extended past the Site on Salisbury Road, if considered necessary. It is likely that a gateway feature or sequence of features would be provided on Salisbury Road, to provide an element of traffic calming and management.

In terms of connectivity, there are existing local pedestrian routes which connect the Site to the village centre and Pewsey Railway Station. Pedestrian or cycle links could be provided to the north towards the village centre to connect to existing public rights of way. An opportunity exists to improve cycle and pedestrian access to both employment generated by this development and the isolated existing Salisbury Road units.

It is proposed that the existing public right of way along the northern boundary would be retained within the development and the possibility of improvements would be explored.

There are also bus stops close to the Site on Swan Road and Salisbury Road which offer regular peak and off -peak services to Swindon, Marlborough and Salisbury.

### Ecology

The Site is not covered by any international or national statutory designations. However, within 10km of the Site, there are three internationally important designated sites, namely Pewsey Downs Special Area of Conservation (SAC), Salisbury Plain SAC/ SPA and the River Avon SAC. Any potential impacts on these sites would be considered through the planning application process and appropriate mitigation as necessary would form part of the proposal.

### Archaeology / Heritage

The Site does not contain any designated heritage assets, such as scheduled monuments or listed buildings. As a result, there are no 'in principle' archaeological or heritage constraints to the future development of the Site.

There are a number of listed buildings situated within 1km of the Site with several located along Church Street, c 150m east of the Site, surrounding the Grade I listed Church of St John the Baptist. The vast majority of these listed buildings fall within the Pewsey Conservation Area, which lies immediately east of the Site, beyond Swan Road. The proximity of the Conservation Area to the Site is shown on the Overall Considerations Plan in Section 2.5

There are no world heritage sites, scheduled monuments, registered parks and gardens or registered battlefields within 1km of the Site.

## 2.5 Overall Considerations Plan

The plan on this page summarises the key considerations and characteristics of the Site and identifies potential constraints and opportunities.

- A. Potential primary access point from Swan Road leading in to the centre of Pewsey
- B. Potential additional access point to the southern area of the site via Salisbury Road
- C. Potential pedestrian or cycle access points providing access from the Site to the wider countryside to the west and the amenities in Pewsey to the east
- D. Existing mature vegetation along the River Avon corridor through the centre of the Site and former field boundaries
- E. River Avon route through the Site
- F. Areas covered by Flood Zone 2 and 3 from the River Avon through the centre of the Site
- G. Potentially sensitive boundary to existing residential properties on The Crescent and The Links to the north of the Site
- H. Close proximity to Pewsey Conservation Area
- I. Relatively open aspect from the Site looking north
- J. Relatively open aspect from the Site looking west
- K. Relatively open aspect from the Site looking south across Salisbury Road
- L. Existing sewage treatment works to the Site's western boundary
- M. Sensitive boundary to the sewage works (assumed that at least a 50m cordon sanitaire will be required)
- N. Site high point- approximately 120m AOD

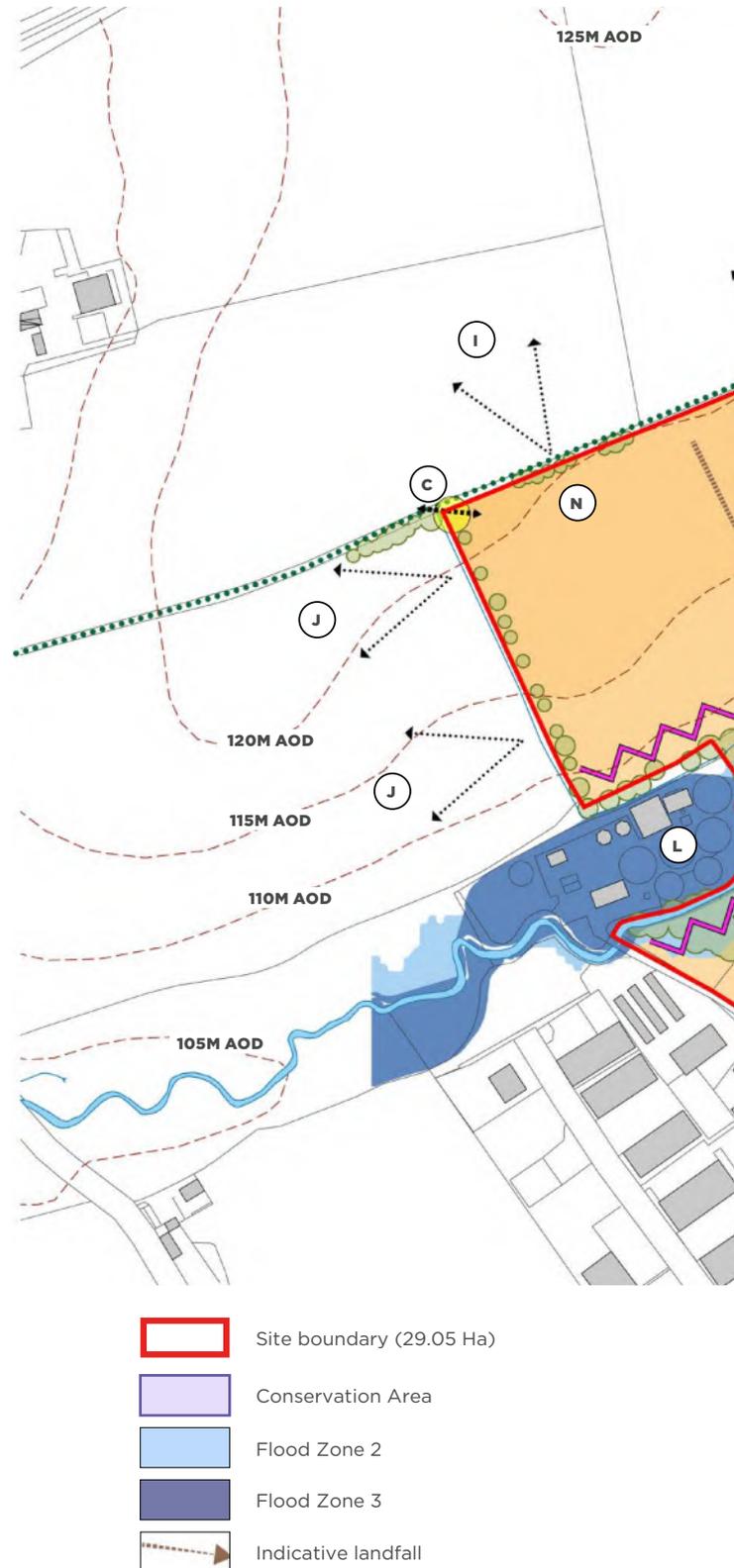
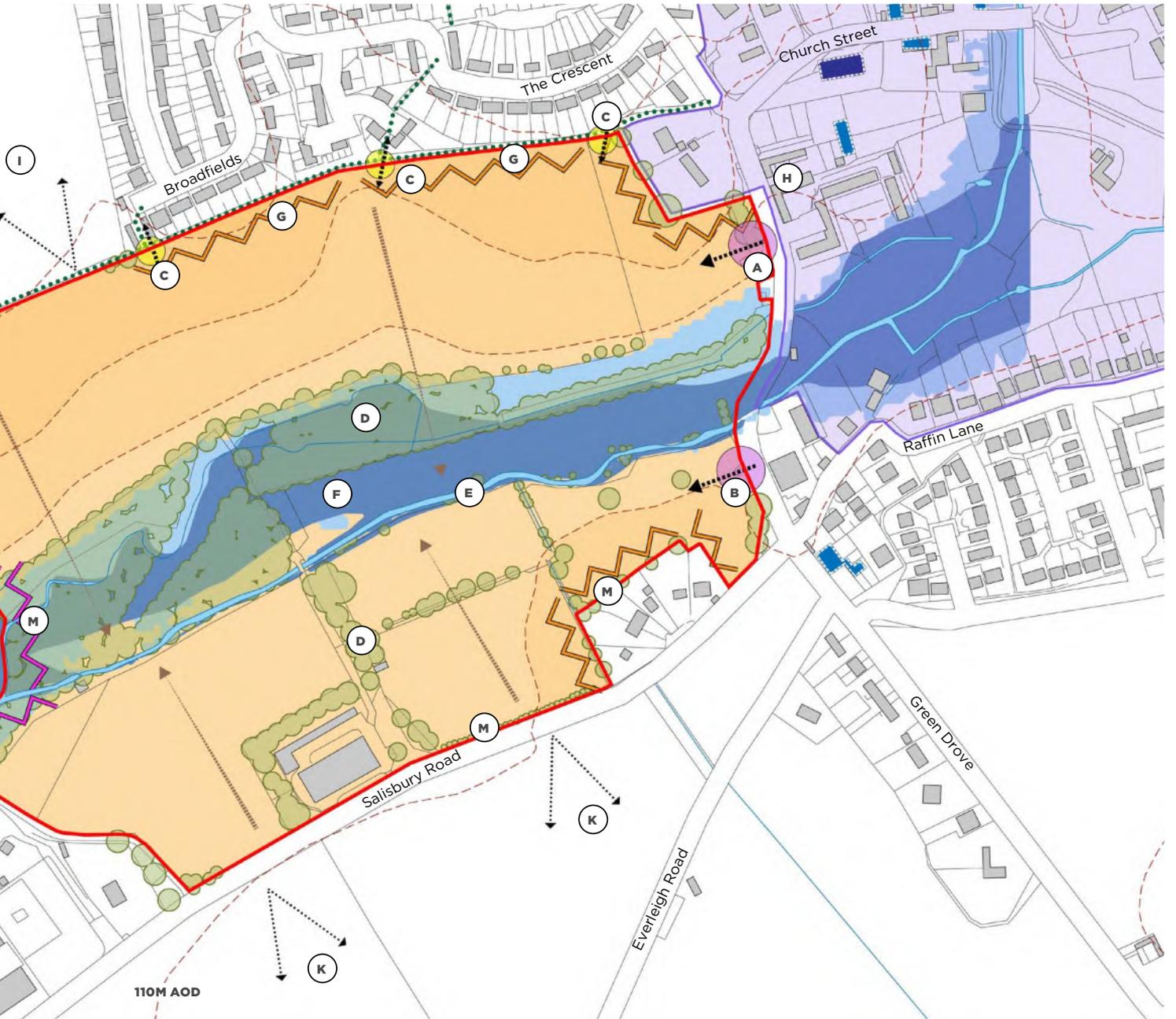


Fig 07: Overall Considerations Plan



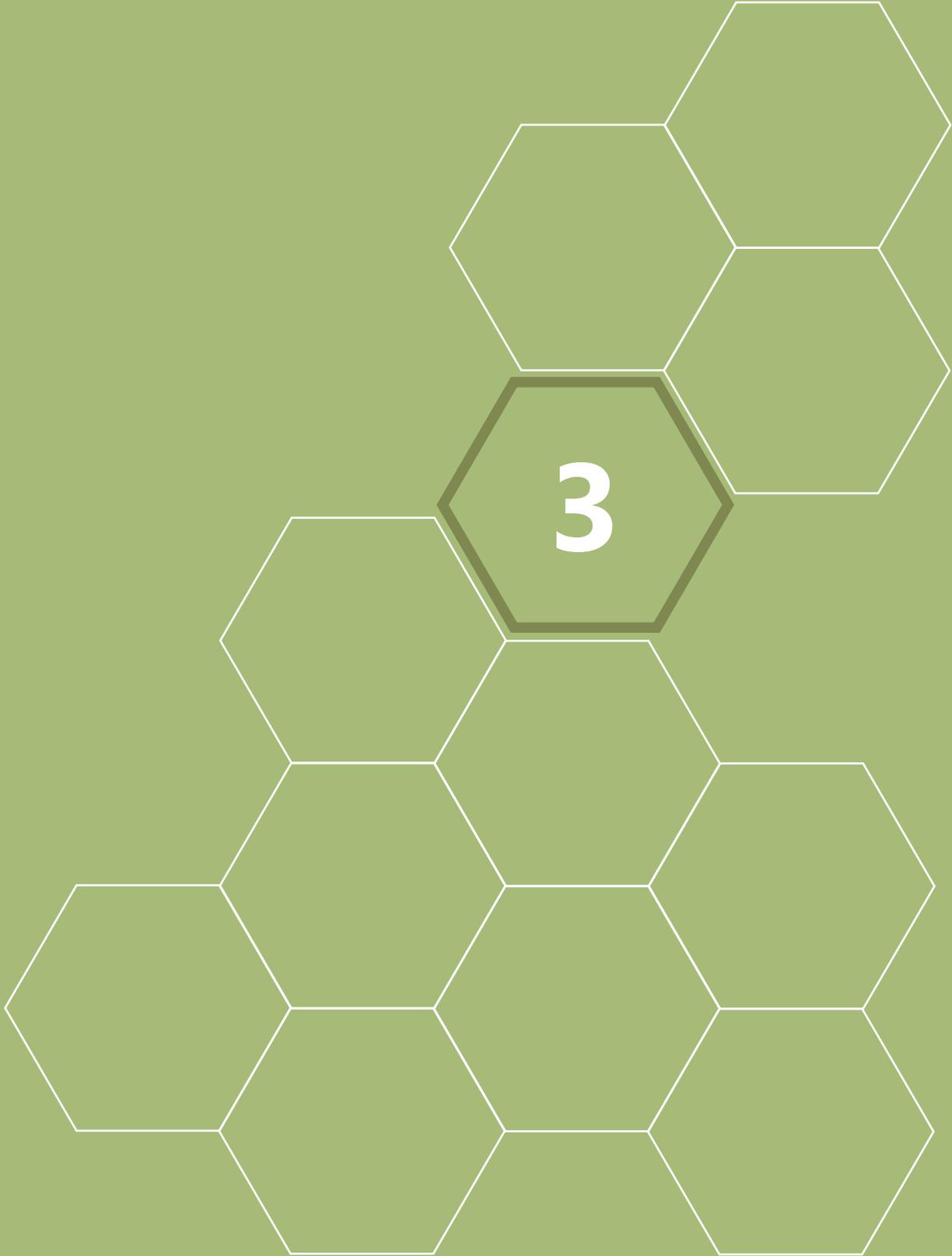
- |  |  |  |   |
|--|--|--|---|
|  | Public right of way                    |  | Sensitive boundary to existing residential properties |
|  | Potential pedestrian access point      |  | Sensitive boundary to existing sewage works           |
|  | Potential primary vehicle access point |  | 5m contour  |
|  | Existing vegetation                    |  | Grade I Listed building (St John's Church)            |
|  | Open aspect out from the Site          |  | Grade II Listed buildings                             |

## 3.0 Design

3.1 Vision

3.2 Design Principles

3.3 Concept Masterplan



# Design

## 3.1 Vision

“The Land at Swan Road presents an excellent opportunity for a **sensitive, landscape led, sustainable residential extension** to Pewsey. Using the River Avon as a **centrepiece for a new linear park**, new neighbourhoods can sit within a comprehensive **landscape and open space network**, whilst being within **walking distance of the amenities** and services in central Pewsey.”

## 3.2 Principles

1. **Strong Local Vision** - Involvement of the local community and stakeholder groups to gain consensus on the nature of the development and to ensure that the vision is specific to the Site and place.
2. **Clear Identity** - A distinctive local identity which takes character clues from Pewsey and the surrounding built form, including the Conservation Area.
3. **Landscape Led** - retaining the existing vegetation and the River Avon to create a new linear park for new and existing residents in Pewsey.
4. **Sustainable Scale** - Creation of a neighbourhood which can harbour close knit communities, with local facilities in Pewsey within easy walking and cycling distance.
5. **Well Designed Place** - A sustainable extension to Pewsey, of high quality design, with provision of community-focussed open space on site and direct access to the network of public rights of way leading to the wider countryside.
6. **Great Homes** - Provision for high standard new homes, which will be across a range of types, sizes and tenures. Committing to this diversity of dwelling types can assist with creating a mixed and balanced community.
7. **Accessibility** - Ensuring accessibility for all is at the heart of the masterplan. Integrating pedestrian and cycle infrastructure to streets and open spaces, encouraging active travel and non vehicle travel to Pewsey.



Fig 08: Vision images

### 3.3 Concept Plan

**The indicative concept masterplan for up to 400 homes (with potential care/retirement and employment uses) shown on this page is a culmination of the technical work undertaken to date, as well as a review of the Site and relevant local and national policy.**

The key aspects of the concept plan are as follows:

- A. Potential primary site access from Swan Road (highways arrangement to be confirmed) to development areas to the north of the River Avon
- B. Potential primary site accesses from Salisbury Road to development areas to the south of the River Avon
- C. Potential residential development areas north of the River Avon
- D. Potential residential development areas south of the River Avon, retaining existing mature trees where possible
- E. Potential location of specialist residential (care/retirement) development
- F. Potential location of employment development
- G. New green edge to Pewsey
- H. Central green spine created along the River Avon with walking routes and recreation areas
- I. Potential pedestrian links to the existing public right of way running along the Site's northern boundary
- J. Development set back from existing sewage treatment works, with new planting to screen views
- K. Green streets through the development areas to link open spaces in the north to the new linear park through the centre of the Site



	Site boundary (29.05 Ha)
	Potential residential development areas (11.16 Ha)
	Potential location of specialist residential (care/retirement)
	Potential location of employment development
	Areas of public open space

**Fig 09:** Illustrative framework plan

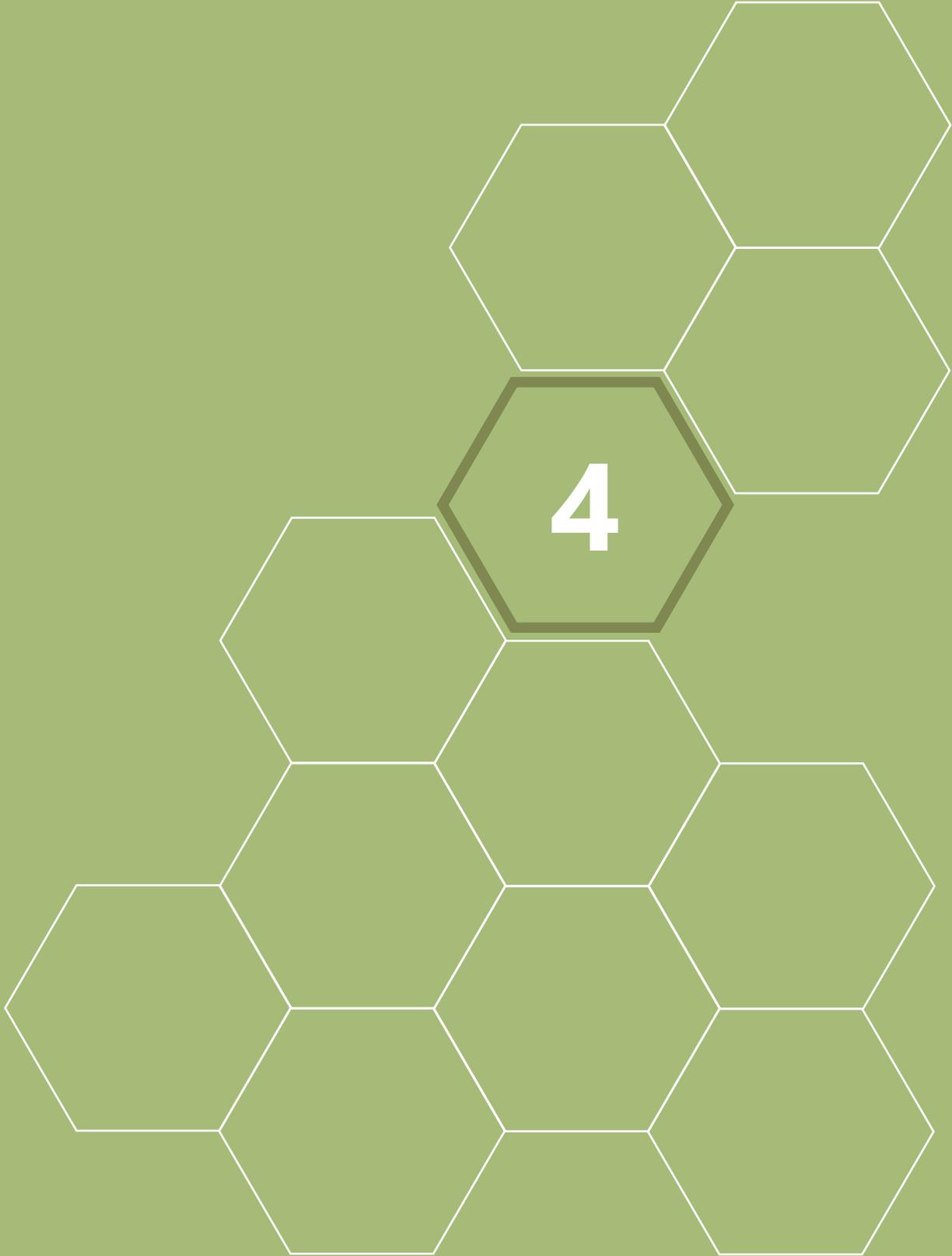


110M AOD

- |   |   |   |                     |
|---|---|---|---------------------|
|  | Potential new buffer planting and tree planting |  | Public right of way |
|  | Potential pedestrian access point               |  | River Avon          |
|  | Potential primary vehicle access point          |   |                     |
|  | Potential location of building frontage         |   |                     |
|  | Existing vegetation retained                    |   |                     |

# 4.0 Summary

## 4.1 Conclusions & Key Benefits



# Summary

## 4.1 Conclusions & Key Benefits

**This document has set out the vision and the emerging proposals for the Land at Swan Road, Pewsey. In light of the work undertaken to date, it is considered that the Site can deliver a high quality new residential neighbourhood that responds positively to its surroundings, whilst creating open space benefits to new and existing residents.**

The key benefits can be summarised as follows:

1. Delivery up to 400 new homes, including a mix of market and affordable housing to meet local identified need
2. Potential delivery of a new retirement or care facility on Site
3. Potential new employment land
4. Creation of a new linear park along the River Avon, opening up a significant usable open space for leisure and recreation
5. Creation of a development layout which is responsive to the Site's constraints, including the retention of existing vegetation and keeping areas of flood risk open
6. Sensitively extending the settlement envelope of Pewsey to form a new neighbourhood within walking distance of the village centre and railway station
7. Include areas for surface water management to ensure that flood risk is not increased in areas outside of the Site
8. Provide increased access to the wider countryside through the Site to public rights of way in the west
9. Ensure that development is set an appropriate distance away from the existing sewage works, and create a new planted buffer to screen it from view
10. Create a high quality new residential neighbourhood with outdoor recreation spaces to encourage social interaction, provide a mix of both market and affordable homes to suit local need, as well as creating new areas of increased biodiversity along the River Avon.



**Expansive areas of open space with retained vegetation for recreation, leisure and play**



**Areas for biodiversity enhancement**



**A new linear park along the River Avon to be opened up to the existing community**



**A mix of up to 400 new homes including open market and affordable homes in a range of sizes to suit local need**

**Fig 10:** Site summary infographics



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Our ref: C0012795

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**By Email Only** – [spatialplanningpolicy@wiltshire.gov.uk](mailto:spatialplanningpolicy@wiltshire.gov.uk)

9 March 2021

Dear Sir / Madam

## **LOCAL PLAN REVIEW CONSULTATION – REPRESENTATIONS ON BEHALF OF LAND AT SWAN ROAD, PEWSEY**

We write on behalf of our client, Paul Bowerman Discretionary Trust and PH Bowerman Esq, in response to the Wiltshire Local Plan Review (LPR) 'Issues and Options' (Regulation 18) consultation.

As demonstrated in this document, the site represents an opportunity to deliver a sustainable, distinct and well-connected development reflecting the logical direction of growth at Pewsey. As demonstrated in the attached vision document, the site is suitable to accommodate up to 400 homes set amongst extensive public open space with pedestrian and cycle routes connecting the development to Pewsey.

The site has potential to deliver a number of social, economic and environmental benefits to the area through the delivery of new market and affordable housing of varying types and sizes; provision of open space in excess of planning policy requirements; and financial contributions towards infrastructure improvements through Wiltshire Council's CIL and S106 mechanisms. The site's opportunities and constraints, together with the overall concept, are explained in more detail in the attached vision document.

This representation comments on the Local Plan Review Consultation Documents, namely:-

- Emerging Spatial Strategy
- Empowering Rural Communities

Additionally, we provide comment on the following supporting documents:-

- Local Housing Needs Assessment - Swindon Borough Council and Wiltshire Council (Opinion Research Services April 2019)
- Local Plan Review Interim Sustainability Appraisal – January 2021
- Level 1 Strategic Flood Risk Assessment – JBA Consulting May 2019

The representation is structured in the following sections:

1. Land at Swan Road, Pewsey
2. Local Plan Review Consultation Documents
3. Supporting Evidence Documents

## 1. Land at Swan Road, Pewsey

### Site Context

The site is located at the south western fringe of Pewsey, approximately 800m from the village centre. The site area extends to approximately 71.78 acres (29.05 hectares).

The site is bound to the south by the A345 (Salisbury Road) which also provides one of the accesses to the site. The site is bound to the east by Swan Road (again with accesses) and to the north by the existing residential development off “The Crescent”, to the north west by further agricultural land and to the west by a sewage treatment works and Salisbury Road Business Park.

The site comprises greenfield agricultural land that is bisected by a number of mature hedgerows and mature trees.

The topography of the site gradually slopes from the site’s northern and southern boundaries, forming a shallow valley towards the River Avon, which runs east to west across the centre of the site. A mature tree belt runs alongside the meadows which transect the site.

### Site Characteristics

The site’s characteristics, together with key constraints and opportunities, are summarised below. For more detail, please see the enclosed Vision Document for the site included with this submission.

#### *Highways and Access*

An initial access appraisal has been undertaken to review the opportunities available for access to the land. In addition to the three existing access points, access to the site can also be achieved via points onto Swan Road to the east of the site and the A345 Salisbury Road to the south of the site. A further access point could also be provided on Swan Road opposite the existing petrol station.

In terms of connectivity, there are existing local pedestrian routes which connect the site to the village centre and Pewsey Railway Station. Pedestrian or cycle links could be provided to the north towards the village centre to connect to existing public rights of way. It is proposed that the existing public right of way along the northern boundary would be retained within the development and the possibility of improvements would be explored.

There are also bus stops close to the site on Swan Road and Salisbury Road which offer regular peak and off-peak services to Swindon, Marlborough and Salisbury.

#### *Ecology*

The site is not covered by any international or national statutory designations. However, within 10km of the site, there are three internationally important designated sites, namely Pewsey Downs Special Area of Conservation (SAC), Salisbury Plain SAC/ SPA and the River Avon SAC. Any potential impacts on these sites would be considered through the planning application process and if required, mitigation would form part of the proposal.

#### *Archaeology / Heritage*

The site does not contain any designated heritage assets, such as scheduled monuments or listed buildings. As a result, there are no ‘in principle’ archaeological or heritage constraints to the future development of the site.

There are a number of listed buildings situated within 1km of the site with several located along Church Street, c 150m east of the site, surrounding the Grade I listed Church of St John the Baptist. The vast majority of these

listed buildings fall within the Pewsey Conservation Area, which lies immediately east of the site, beyond Swan Road.

There are no world heritage sites, scheduled monuments, registered parks and gardens or registered battlefields within 1km of the site.

## *Landscape*

The site is located within the North Wessex Downs Area of Outstanding Natural Beauty (AONB). There are no other designations that lie adjacent to or within any part of the site. The White Horse Trail promoted route runs east, south and west of the site within a 2km radius and the Open Access Land upon Pewsey Hill's northern slopes contains the cultural attraction of the Pewsey White Horse.

The site is located within the 'Vale of Pewsey' Landscape Character Area. The Vale of Pewsey Landscape Character Assessment determines that the Vale of Pewsey is generally attractive countryside with a strong agrarian character based on its good soils and sheltered position.

The proposal involves a mixture of high-quality design and landscaping. The settlement boundary could also be enhanced by high quality development and impacts on the significant views into the site can be mitigated by suitable landscape buffers.

## **2. The Emerging Spatial Strategy**

We are supportive of Wiltshire's preparation of a Local Plan Review and alongside it, the identification of key issues and aspirations for the County. However, we are concerned that the review is being undertaken in a piecemeal way which is not embracing the opportunity to review the adopted Development Plan as a whole, including the Site Allocations Development Plan Document (SADPD). We consider that, due to the proposed extent of the Local Plan Review, the other adopted documents in the Development Plan will be considerably changed and that by the time the plan is adopted the SADPD will be nearing the end of its life. For efficiency (in both resources and cost) and simplicity's sake, we suggest that it would be more prudent to assess the functionality of the Development Plan as a whole and review it in its entirety now.

The LPR includes the identified 'Main Settlements' which refers to the Principal Settlements and Market Towns. The LPR does not propose a review of the settlement strategy at this stage and Pewsey remains a Local Service Centre. The Settlement Strategy document (January 2012), which formed the evidence base to this strategy, determines that Market Towns are identified as settlements where there is an existing concentration of employment and a realistic potential to expand employment opportunities. Market Towns also have retail facilities, cultural, faith, educational, health and public services that meet the needs of the settlement and the surrounding area.

As demonstrated in the attached Vision Document, Pewsey has a number of services and facilities that meet the requirements of a Market Town designation. There are a number of employment uses located at Pewsey and in particular to the west of the town, such as Salisbury Road Business Park. The following facilities are also included at Pewsey:

- Pewsey Vale School
- Pewsey Primary School
- The Vale Community Campus
- Cemetery Chapel
- Holy Family Catholic Church
- Pewsey Post Office
- Co-op Food
- Pewsey Surgery
- Pewsey Library

- 4 Public Houses (The Royal Oak, Coopers Arms, Moonrakers, Shed Ale House)
- Boots Store

Pewsey is particularly well served in having retained the train station (GWR service), providing a regular service to London (Paddington, 1 hour), Reading (35 minutes) and the West Country. We therefore strongly suggest that the settlement strategy be reviewed and Pewsey should be classified as a Market Town to reflect the services, facilities and accessibility of the town.

Whilst we generally concur with the Council's initial considerations in relation to the Spatial Strategy (paragraphs 2.4 – 2.13) we consider that sites, especially large-scale sites, can be developed to be sustainable by including mixed use development, employment, community benefits and improved public transport along with green and blue infrastructure to encourage active travel. The development of sites in smaller scale settlements can significantly improve their sustainability through the introduction of small-scale employment, retail and enhanced community benefits, whilst increasing footfall to the existing centre. We therefore respectfully suggest that paragraph 2.7 should refer to the opportunity to improve sustainability through development.

The impact of Covid-19 alongside the Climate Emergency has certainly changed the way we live and work and this provides both the opportunity and need for the reconsideration of spatial planning. Settlements, and particularly small to medium scale settlements, should be encouraged to embrace this change to limit out commuting further by making provision for community work hubs and meeting facilities with fast broadband.

Brownfield sites play an important role in contributing to overall housing need, and their contribution should be to compliment the strategic housing sites allocated in the Local Plan. The redevelopment of brownfield sites should therefore be encouraged where possible. The Council's 2019 Brownfield Land Register demonstrates that only 3,613 dwellings are potentially available to come forward on previously developed sites with only 45% of the sites having achieved planning permission since the Government requirement to produce a Register. A target for brownfield sites in the LPR is unlikely to change the speed of these sites coming forward and we suggest that Neighbourhood Development Plans must therefore be an appropriate platform to positively plan for bringing forward smaller scale brownfield sites to complement the Local Plan allocations.

### Housing Need

The NPPF (2019) sets out that the Standard Method for calculating Local Housing Need (LHN) should be used to identify a *minimum* annual housing need figure (paragraph 60), and PPG guidance reiterates that the Standard Method does not provide a housing requirement figure in itself (paragraph: 002 Reference ID: 2a-002-20190220). It is therefore clear that the calculation of LHN is a starting point in identifying the number of homes that must be planned for through the Wiltshire LPR. In this instance, the Standard Method generates a minimum housing need of 40,840 dwellings over the 20 year Local Plan period (2016-2036).

Whilst the Standard Method takes into account projected household growth, the LHN Assessment (April 2019) undertaken for Swindon Borough Council and Wiltshire Council takes into account longer term migration trends and employment growth amongst other factors. The Assessment concludes that to ensure that there will be sufficient resident workers to align with the job growth identified by the 2017 EDNA forecast, the minimum housing need should be increased by up to 5,700 dwellings with most of this increase (at least 85%) being in Wiltshire. This would take the housing need calculation to 45,630 dwellings in Wiltshire over the Plan period.

The PPG makes clear that the Standard Method calculation does not predict the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour and that therefore, there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicates (paragraph: 010 Reference ID: 2a-010-20201216). Our client therefore supports the Emerging Spatial Strategy insofar as it recognises the need to plan for a higher figure than the LHN – given the job growth forecasts - and moreover, that the development strategies for each of the Housing Market Areas (HMAs) should be based on the higher end of the range (45,630 homes).

## Swindon Housing Market Area (HMA)

The LHN Assessment provides a forecast for the whole of the Swindon HMA, including Swindon Borough, which is calculated as c.16% lower for the period 2016 -2036 than the figure established in the WCS for the period 2006-2026. Given the forecasts which indicate a need to plan for higher housing numbers, our client's view is that it is not appropriate to roll forward the current strategy but that instead, the LPR should explore alternative development strategies for this HMA.

The Formulating Alternative Development Strategies (ADSs) document for the Swindon HMA (January 2021) considers economic, social and environment factors for each of the regions in the HMA and concludes that there is evidence to justify a higher rate of growth in Royal Wootton Bassett. However, they include a lower rate for the rest of the HMA.

Focusing growth on the rest of the HMA was considered to be the worst performing options because of the concerns relating to landscape, heritage and transport impacts. Whilst our client supports the drive to focus growth in locations which have been identified as suitable to withstand such development, there is also a need to balance the requirements to deliver a range of housing and opportunities across the district, which this plan overlooks. Furthermore, the Sustainability Appraisal identifies a number of 'non-decent' homes as greatest in rural areas and pockets of fuel poverty have been identified throughout Wiltshire. The percentage of households in fuel poverty is greatest in South West Wiltshire followed by the Pewsey Community Area. The current LPR has focused development in limited areas overlooking wider issues of deprivation across the district.

Whilst our client is of the view that adopting the higher housing target would put the Council in a more robust position when planning for the longer term, by planning for a greater level of contribution to meeting national and local needs for more homes. Our client is therefore supportive of the LPR's approach in developing its spatial strategy based on the upper end of the forecast housing need range; however, they also support reviewing the settlement strategy when allocating these numbers to ensure development is evenly distributed.

## Delivery Principles – Neighbourhood Planning

Whilst the Wiltshire community has to a large extent embraced Neighbourhood Planning, there are still parishes that have not sought to produce a Neighbourhood Plan. Consequently, there is concern that the LPR's reliance on sites being identified and coming forward through this mechanism to address the recognised need is aspirational. Therefore, it is considered that it is the responsibility of Wiltshire Council through the LPR, to allocate sites outside of the Principal Settlements and Market Towns where Neighbourhood Plans are not being produced, or where Neighbourhood Plans do not allocate sites for residential development to meet their recognised local housing need.

Additionally, we do not consider the need to phase the construction of Greenfield sites as, logistically, large sites do not come forward in one lump due to the nature of construction. Indeed, due to Covid restrictions on construction, the building out of sites has decelerated due to socially distanced working requirements. Later provision of large consented schemes, that have undoubtedly had many years of promotion and planning, only seeks to delay deliverability and constrain the market resulting in increased property prices. Such interference is unhelpful.

Pewsey Neighbourhood Plan was 'made' in 2015. The site is not included in the Neighbourhood Plan Area.

## Empowering Rural Communities

We consider that the 'Empowering Rural Communities' paper somewhat downplays the importance that Local Service Centres and Large Villages contribute to meeting the County's residential and employment needs and that it is a flawed approach to take for these higher order settlements. Indeed, some Local Service Centres such as Pewsey contain more facilities (eg train station and secondary education) than the Market Towns and

this needs to be recognised. The onus should not only be placed on Neighbourhood Plans to meet the identified housing, social and environmental requirements. Some town and parish Councils are not equipped or, in some cases reluctant, to embrace such a challenge, although our clients particularly welcome engagement in the Pewsey proposals.

Whilst it is welcomed that guidance will be prepared by the Council to support Towns and Parishes on the selection of the most appropriate sites for development, there does not appear to be a policy requirement for these needs to be met. Additionally, a single combined policy devalues the settlement hierarchy and does not provide a positive vision for the future of each area, contrary to NPPF Para 15.

We are concerned with the ambitious blanket target of 40% affordable homes on all new schemes of more than five dwellings in the rural area. This goes far beyond the minimum 10% requirement of NPPF Para 64 and fails to recognise the level of affordable housing actually required in the area. Indeed, this target may result in fewer sites coming forward for development as local communities may resist such levels of social housing.

Whilst one policy reference for assessing planning proposals to meet local housing needs at rural settlements simplifies the Local Plan Review, it is inappropriate to consider Local Service Centres and Large Villages under the same umbrella as Small Villages due to their varying levels of population, facilities and services (Para 20). The NPPF Para 67 recognises the important contribution that small and medium sized sites can make to meeting the housing requirement of an area and it is considered that due to the level of housing required to be met by the 'rest of the HMAs' (1,080 dwellings in the Swindon HMA), this necessitates the need for additional allocations to be made now outside the Principal Settlements and Market Towns.

Rural Settlements, by their very nature, have limited access to public transport therefore the revised Core Policy 44 (iii) requirement of proposals not being reliant on travel by private car is aspirational but unfortunately considered unachievable due to the level of public transport provision in the rural settlements. We therefore suggest that the policy is amended to remove this requirement. Conversely, access to alternative transport provision, including rail and bus services should be recognised.

Additionally, we consider that an arbitrary cap of 20 dwellings per settlement as proposed in Core Policy 44 (v) will prevent suitable and sustainable sites from coming forward on both greenfield and particularly brownfield sites where densities are likely to be higher if apartments are considered. This is in conflict with NPPF Para 122 in that it fails to support development that makes efficient use of land. This draft policy is also contrary to NPPF Para 123 in that it will encourage lower density development and will not ensure that developments make optimal use of the potential of each site.

Due to the large requirement for additional dwellings in the Local Service Centres and Large Villages detailed in the Table on Page 9, we consider that the LPR should seize the opportunity now to make additional housing allocations in these mid tier settlements in the form of additional allocations. Due to the delay in the adoption of the Core Strategy and SADPD, we suggest that the LPR should address the housing requirement across all tiers of settlements now due to the levels of housing need identified, rather than wait for a review of the SADPD.

In conclusion, we consider that the housing requirements for the Local Service Centres and Large Villages should be higher; it is not appropriate for these mid-tier settlements to be grouped with small villages as they benefit from a far greater level of services and facilities and are therefore more able to receive and benefit from sustainable growth.

### **3. Supporting Evidence Documents**

Local Housing Needs Assessment (LHNA) - Swindon Borough Council and Wiltshire Council (Opinion Research Services April 2019)

It is considered that the LHNA is out of date as it is calculated on the basis that the strategic policies of the Core Strategy are not out of date. It is acknowledged that the minimum Local Housing Needs figure for Wiltshire in 2019/2020 is 2,042 dwellings per year which yields an overall minimum housing need for Wiltshire of 40,840 dwellings over the Local Plan period 2016 – 2036. The report concludes however that the evidence suggests that an additional 6,300 dwellings would have to be provided to enable sufficient workers to live in the combined area going forward (Para 4.26).

## Local Plan Review Interim Sustainability Appraisal - January 2021

It is noted that the Interim Sustainability Appraisal (ISA) tests a range of local housing needs from 40,840 to 45,600 dwellings for the period 2016 to 2036. The Sustainability Appraisal assessment of the alternative development strategies for the HMAs concludes that there would be no adverse effects of such significance that would prevent the higher figures (of each alternative strategy) from being progressed. Moreover, it concludes that a higher figure level would be more robust when planning for the longer term and has a greater level of contribution to meeting national and local needs for more homes. We are therefore supportive of the LPR's approach in taking the higher level as a basis for developing the spatial strategy.

We support the conclusion of the ISA that lower levels of growth through strategies A and B are likely to have an adverse effect on rural parts of the HMA that will exacerbate affordability issues. We concur that rural areas can and should, accommodate a higher level of growth and propose that such growth could be accommodated on our client's land at Pewsey.

We consequently support the recommendation in paragraph 4.6.3 (1) that an additional / amended development strategy that reduces proposed development levels around the more environmentally constrained settlements and that growth should be increased in the less environmentally constrained settlements in the rest of the HMA.

## Level 1 Strategic Flood Risk Assessment – JBA Consulting May 2019

Whilst it is acknowledged that Pewsey generally is subject to high flood risk, the development proposal has been designed to mitigate against flood risk and the portion of the site identified in Flood Zones 2 and 3 are not proposed for development. Further technical studies will be undertaken in this regard as promotion of the site progresses.

Indeed, development proposals will be informed by the Council's themes contained within the "Addressing Climate Change and Biodiversity Net Gain" paper by limiting development to Flood Zone 1; incorporating SUDs drainage solutions and natural flood management measures; enhancing and creating new green and blue infrastructure; providing a minimum of 10% biodiversity net gain to be managed in perpetuity; development will be designed to achieve a net zero carbon standard and will seek to minimise embodied carbon and environmental impacts; electric vehicle charge points will be provided; and the site will be designed to encourage sustainable and active travel modes.

## **Conclusion and Summary**

These representations and the attached Vision Document demonstrate the potential that land at Swan Road, Pewsey has to offer in providing a new residential neighbourhood within walking distance of the town, that can deliver up to 400 dwellings in a landscaped setting, including a mix of market and affordable housing. The development proposals respond positively to the site's surroundings by creating a new linear park along the River Avon connecting into the existing public rights of way network, releasing a significant usable open space for leisure and recreation whilst retaining and enhancing the site's biodiversity.

We are pleased to have had the opportunity to comment on this stage of the Wiltshire Local Plan Review. We trust that the information provided assists the Council with its ongoing work as part of the LPR process.

However, please do not hesitate to contact me should you have any queries. We look forward to further and continued dialogue with the Council regarding development options at the Land at Swan Road, Pewsey and would welcome the opportunity to meet with the Council to discuss our proposals in more detail. We look forward to arranging this meeting in due course.

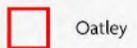
Yours faithfully



**STRAT354**



LEGEND



Oatley



Cradock



Proposed Allocation

# WILTSHIRE LOCAL PLAN 2016-2036

## LOCAL PLAN REVIEW CONSULTATION

(JANUARY 2021)

REPRESENTATIONS OF LIGHTWOOD STRATEGIC

ON BEHALF OF

HILPERTON MARSH FARM & PAXCROFT FARM

NEW BARN FARM

APPENDIX 2



LIGHTWOOD





Option 1



Option 2



Option 3



Option 4



Green Infrastructure Link



# WILTSHIRE LOCAL PLAN 2016-2036

LOCAL PLAN REVIEW CONSULTATION  
(JANUARY 2021)

REPRESENTATIONS OF LIGHTWOOD STRATEGIC

ON BEHALF OF

HILPERTON MARSH FARM & PAXCROFT FARM  
NEW BARN FARM

MARCH 2021



LIGHTWOOD

## INTRODUCTION

- a) These representations have been prepared by Lightwood Strategic who are working in a promotional capacity with [REDACTED] of Hilperton Marsh Farm and Paxcroft Farm, and [REDACTED] of New Barn Farm Hilperton, Trowbridge.
- b) [REDACTED] own 58% of Site 5 (North East Trowbridge). With the addition of [REDACTED] ownership this increases the coverage to 75%.
- c) Within Site 4, [REDACTED] own a small area of around 0.6ha, but to the east of Site 4 their land hosts a 10MW solar farm. This generates enough electricity to power 2,700 homes based on the usage of an average home.
- d) It is highly material to these representations that [REDACTED] also own Site 6, between the A361 and the A350 (and land beyond the A350). Consequential to the publication of the emerging Local Plan, Site 6 is now being promoted as a Country Park and Suitable Alternative Natural Green Space of up to 63ha (155acres).
- e) Appendix 1 sets out a land ownership plan in the context of the emerging site allocation boundaries

### Appendix 1: Land Ownership Plan

- f) These representations focus on:
  - The emerging spatial strategy to the extent that most directly affects Trowbridge
  - the justification for the selection of Site 4 and Site 5, in-principle, and the emerging policy criteria and concept plan that the Council has published.
- g) As an opening statement, noting that this is not a full draft plan consultation, we think that the Council has got it 'about right' in terms of what it is presenting at this stage. The documentation is trying to funnel down options (to be able undertake meaningful consultation) whilst remaining open to changes prior to the preparation of the pre-submission Local Plan. Nonetheless, and as invited to do so, we comment on issues that could ultimately affect the soundness of the Local Plan, so that these can be considered and addressed. We recommended no-going engagement with critical parties during 2021.

## Emerging Spatial Strategy

### Introduction

#### Plan Period and Housing Requirement

- 1.1 The National Planning Policy Framework (NPPF) (2019) mandates a 15-year plan period from adoption, whereas the 2012 NPPF merely preferred this time horizon. Evidently the Local Plan is not going to be adopted in 2021, yet the proposed plan period only runs to 2036. Consequently, the Council needs to make a sensible evaluation of when this key date will be and how it will affect the required time horizon of the Local Plan.
- 1.2 Given the need to continue to assemble the evidence base, prepare the Pre-submission Local Plan, submit the Plan, have the plan examined, propose and consult on inevitable modifications, receive the Inspector's report and adopt the Plan, adoption is some way off. It took the best part of 3 years to adopt the Core Strategy following consultation on the Pre-submission version in February 2012. At least 2 years should be budgeted for this time, but 2.5 years is equally probable. If the consultation on the pre submission Local Plan takes places in Q4 2021, then adoption could be assumed in Q4 2023, during the 2023/24 monitoring year. Speeding up the process will not affect 2023/24 as the adoption year. A little slippage one is into 2024//25.
- 1.3 Based on the best-case scenario, the plan period should extend by a further two years to 2038 and there will be ramifications for the housing requirement for Wiltshire as a whole, that will trickle down into the housing market areas and the key settlements.

#### Formulating the Spatial Strategy

- 1.4 The Council clearly envisage that the next consultation stage will be a Pre-Submission Local Plan consultation, but we are somewhat concerned that its spatial strategy optioneering is entirely sub authority Housing Market Area (HMA) orientated, with the adopted HMA geography recalibrated in the Local Housing Needs Assessment (ORS:2019). The NPPF no longer refers to HMAs and today these are simply a statistical construct presenting one way of formulating a spatial strategy at the highest level.
- 1.5 Evidently, the sub-division of the County wide housing requirement into the three HMAs has previously been found to be sound. However, a County is capable of having its spatial strategy devised without reference to HMAs, based on a pure settlement hierarchy approach. The Council needs to assess whether this is a reasonable alternative or not, and if not, explain why. Whilst this might feel like going over old ground (i.e the Core Strategy examination) the Council is now engaged in full review where everything is 'up for grabs'. The rejection of a pure settlement hierarchy

approach should not be regarded as 'water under the bridge' and should be reassessed within the SA even if ultimately and cogently rejected.

- 1.6 The minimum housing requirement, based on the current standard methodology for assessing minimum housing needs is 2006 per annum. For 2016-2036 this generates a minimum requirement of 40,120, which increases to 44,132 to 2038. As required by the NPPF, the Council has also undertaken a Local Housing Needs assessment (LHN) and this generates a figure 45,360 (2,268 per annum) to 2036 or 49,896 to 2038. The LHN is higher on the basis of a jobs/homes forecast and is being used as the housing requirement. The Council note that this higher figure (as a supply figure) or thereabouts represent contingency against the minimum requirement to 2036. Essentially, it is saying that if the economic forecast does not come to fruition then it can still point to a 'float' of 5,240 homes (2.5 years supply or 13% of the standard method figure), to 2036.
- 1.7 Due to the protracted process of plan-formulation in Wiltshire (which is understandable rather than a criticism), the LHN is 'getting on a bit' and will be even older at examination. There has also been quite a bit of an economic shock that will have sustained consequences. No one can accurately forecast the future, but some assessment on the effect on the jobs led LHN figure is needed. Downward pressure would not be a surprise.
- 1.8 The good news is that the standard method output to 2038 (of 44,130) is of the same order of magnitude to the current LHN figure to 2036 (45,360). Thus, at the very least the housing requirement should stay at around the same level that is currently being consulted on. The supply figure is at around the same level too, with not a lot of newly proposed development expected to extend beyond 2036. However, contingency headroom shrinks considerably leaving the Council exposed to sidewinds or headwinds in respect of the delivery trajectory that it adopts.
- 1.9 So often we see LPAs only able to get themselves politically to a 'Plan A' position with no embedded 'Plan B'. This often lead to a loss of control and planning by appeal (such as is the case now). The Council loses control and the only way to get it back is to review the Plan (which takes forever and yet the same mistakes are made, and on it goes). There is real benefit in embedding 'go-to' Plan B sites/strategies that can be subject to release criteria. Policy objective can be drafted and control can be retained. Based on a plan period to 2036 the Council achieves such a position, but it will be interesting to see if it can retain that position against a plan period to 2038.
- 1.10 The Council has not prepared a housing trajectory, so it is difficult undertake an assessment of the risk profile of the assumed housing supply to 2036 (to 2038) and consequently the degree of buffer that is advisable. As there is no trajectory at all, consultees have no idea whether the Council is planning stepped trajectory or not in the context of some quite large strategic site allocations. At this stage it is not clear whether the overall assumed housing land supply and its nature is capable of

maintaining a rolling 5 year land supply and on what basis (Sedgefield, Liverpool or stepped). These are important matters that need to be dealt with during 2021.

#### Trowbridge Housing Market Area

- 1.11 Taking the emerging spatial strategy as presented, the key theme for the Trowbridge HMA (as set out in para 3.90) is the proportionately reduced role it is to play within the HMA, (53% of supply to 2036 down from 59% of supply to 2026) which is at odds with Chippenham and Salisbury. These are playing a proportionally greater role than previously, based on the theory that concentration at main urban centres is likely to be the most carbon efficient strategy.
- 1.12 The reduced role for Trowbridge is significant (660 houses if 59% was applied to the emerging HMA requirement of 11,000) against a residual HMA requirement for 3,205 homes (20%). Of course, if Trowbridge was to increase its role, the number would be different still, but first it is easiest to focus on the return to a 'business as usual' case
- 1.13 Paragraph 3.83 focuses on the importance of Bath and Bradford on the Avon Special Area of Conservation (SAC) as a determining factor. The reasoning does not mention the Green Belt, suggesting that there is additional non-Green Belt land that could have played a role.
- 1.14 We do not subscribe to the view expressed with para 3.82 that *'The planning authority has a duty to avoid adverse effects upon protected habitat before following a course of mitigation. This would translate into growth rates that are the lowest possible to support Trowbridge's role as principal settlement and in providing for local needs'*.
- 1.15 That logic translates into ascribing protected habitat, primacy over climate change when devising a spatial strategy. This finds no place in the NPPF. What the NPPF (177) does say is that development should not take place unless an appropriate assessment has concluded that the plan or project will not adversely affect the integrity of the habitats site (in this case the SAC). That approach does not bind the plan-making authority to the 'lowest possible' approach set out in paragraph 3.82.
- 1.16 If it can be concluded that a level of growth at Trowbridge, promoted on the basis of its likely lower carbon outputs, would not have an adverse effect then there is no reason to take a different ('sub' climate change-led) approach to Chippenham and Salisbury.
- 1.17 The Council has at this stage judged that the emerging Local Plan is capable of satisfying the two pillars of the Appropriate Assessment (habitats and SANG). The AA will of course be developed as plan-making progress and will be concluded at pre-submission stage. At present the Council has not got an SANG implementation strategy for committed growth let alone additional growth. The February 2020 SPD provides the theoretical recreational pressure mitigation strategy for committed

growth but in part this requires new SANG land. Southwick Country Park does not have unlimited enhancement headroom.

- 1.18 In terms of the Appropriate Assessment of the Local Plan Review, arable land at Paxcroft Farm (Site 6 between the A361 and A350) can provide a new Country Park (SANG) comparable in size to Southwick Country Park. It would appear to be in the ideal location for SANG purposes and, moreover, the landscape scale of such a project to mitigate recreation disturbance pressures would, at the same time be capable of providing a biodiversity net gain for the SAC through habitat enhancement directed at bats.
- 1.19 The maximum size of the SANG on Site 6 up to the A350 would be around 63ha (155 acres) of which the emerging Local Plan says on 38ha is needed for Site 5. A further 10ha is available east of the A350 if it can be linked.
- 1.20 There would be scope to be able to reclaim up to 660 dwelling (equivalent to 12ha of SANG) that are currently directed elsewhere within the Trowbridge HMA on the basis of erroneous planning reasoning. In respect of habitat disturbance, the Council either backs its SPD as capable of achieving at least 100% mitigation, or it does not. With this tool/strategy 'adopted' the suppression of trend growth at Trowbridge needs to be re-evaluated.

## Planning for Trowbridge

### Scale of Growth

#### Additional Homes

- 2.1 The scale growth for Trowbridge within the Trowbridge HMA is set out to 2036 in line with the Wiltshire wide proposed Local Plan horizon. The implication of our comments on the emerging spatial strategy paper is that additional contingency supply for the HMA and Trowbridge within it may be required when the plan period is extended to 2038, as it must be.
- 2.2 We have set out our comments on the overall spatial strategy for the Trowbridge HMA in Section 1. We maintain that argument whilst commenting on the emerging Plan for Trowbridge as written.
- 2.3 The emerging Local Plan proposes 5,830 homes for Trowbridge (2016-2036). On the supply side the Council identifies that 4,025 homes have either been built, have planning permission, a resolution to grant or are allocated for development. This leaves a residual of 1,805.
- 2.4 Appendix 1 of the Emerging Spatial Strategy Paper identifies that of the 370-unit brownfield target (2021-2031), that 149 homes have planning permission. This leaves 221 homes as new brownfield supply. If these are deducted from 1,805 the residual need drops to 1,656. All this supposes that all 2,600 homes at Ashton Park will be fully developed by 2036. A little slippage given on what must be the assumed delivery rate would cause the residual need to creep back up to 2,000+.
- 2.5 On the new supply side for Trowbridge, 2,100 homes are identified across Sites 4 and 5 (to 2036) with a further 500 homes (within Site 5) assumed to occur post 2036. It not unusual for strategic site to be allocated that transcend the plan period. It is clear to us that the Council is not capping delivery at North East Trowbridge by 2036, it is just making an assumption of what might come forward by 2026. To do otherwise would be unsound.
- 2.6 If Aston Park fully builds out there is therefore some flexibility (444 homes or 7.6% of Trowbridge requirement) to 2036, which is perfectly justified. It is positive planning to have some flexibility at a Tier 1 town when across the County there is very little once the plan period is extended to 2038.

#### The Local Economy

- 2.7 Whilst on the basis a high-level statistical report, the Council consider there to be sufficient development land in Trowbridge, we consider that there are placemaking reasons, in light of the strategic growth proposals for North Trowbridge, that the Local Plan should be enabling of additional employment generating development. There is certainly anecdotal evidence that there is more demand than supply for [REDACTED] business premises at Hilperton Marsh Farm and Paxcroft Farm. The Local Plan should be enabling of suitable scaled additions to such locations that are within walking/cycling distance of Sites 4 and 5. For Hilperton Marsh Farm this can be reflected in the site-

specific Policy for Site 5. For Paxcroft Farm, other Development Management policies or Neighbourhood Planning Policies should be enabling.

### **Place Shaping Priorities**

- 2.8 We generally subscribe to the 8 priorities.
- 2.9 The Local Plan should be enabling of priority (iii) in respect of jobs growth within or adjoining strategic allocations. This will enable a degree of internal trip generation, thereby contributing to priority (iv) on travel and transport.
- 2.10 Priority (v) concerns the SAC, but limits the mitigation strategy that which is set out in the February 2020. Of course, the current SPD is clear that it only seeks to address committed growth. Reference will be needed to forthcoming policy wording for Site 5 and possibly revisions to the SPD. We find the second sentence to be out of place in a Place Shaping Priorities section as it strays into the purpose and discussion of the 'Potential Development Sites' section.
- 2.11 Priority (vi) concerns education provision, with the key issue being the strategy for secondary provision for Trowbridge. We reserve our detailed comments here on the Concept Plans and Design Principles but subscribe to the basic fact that at least a 5FE secondary school will be required to serve the proposed North East Trowbridge allocations.

### **Potential Development Sites**

#### Where should development take place

- 2.12 A constraints mapping exercise, undertaken against the background of existing allocations, clearly directs one to the Staverton, Hilperton Marsh and Hilperton area as the first consideration for growth point to accommodate the next major phase of development for the Trowbridge continuous urban area. There would some value in also adding the 600m buffer habitat around the woodland identified in the Bat Mitigation SPD to Figure 1 (Stage 3 SA map on Page 8) as this is a significant constraint. Likewise, there are large infrastructure assets such a Southwick Country Park that are fixed constraints for plan making purposes that should be identified, as well as the Waste Wastewater Treatment Works (and its consultation zone). These further serve to funnel down reasonable alternative locations. The Council should also make a judgement on whether to identify the Hilperton Gap as identified in the adopted Neighbourhood Plan
- 2.13 The Council has assessed alternatives but is justified in its selection of potential sites. As set out below, whilst SANG is a key requirement to make Site 5 (and possibly Site 4) deliverable, there is a clear and obvious area for this within the ownership of Paxcroft Farm. It is the ideal SANG solution. Thus, there can be sufficient confidence (in the eyes of a Local Plan Inspector) that North East Trowbridge is capable of being implemented in respect of the SAC.

- 2.14 In relation to the justification of Site 4 and Site 5, we have reviewed the Site Selection Report and the more detailed Sustainability Appraisal Report that feeds it. Whilst the Council has discounted the Green Belt after confirming to itself that Sites 4 and 5 are preferable, the Site Selection Report is not written this way. The Green Belt is discounted early, based on the pure availability of Sites 4 and 5 (and indeed Site 6). At this stage in the structure of the Site Selection Document, the Council has not made any further assessment of the sustainability and deliverability credentials of the non-Green Belt land (Sites 4, 5 & 6). The promoter of the Green Belt land on the A366 would expect a documented planning judgment only after the Council has assessed that North East Trowbridge could be sustainably developed, which it can be.
- 2.15 Sometimes technical planning choices are finely balanced but in the case of Trowbridge it is reasonably straightforward. Whatever the merits and credentials of Green Belt land on the A366, the NPPF is clear on the importance of Green Belt. This location cannot trump North East Trowbridge. Its time may well come, but it will come after North East Trowbridge or other non-green belt land that maintains the strategic fit of the spatial strategy.
- 2.16 A key issue is that any further phase of planned development at Trowbridge will require at least a 5-form entry (750 place) new secondary school (the minimum viable size) to provide sufficient places. Broadly speaking one might expect 520 secondary school pupils from 2,600 homes at Site 4 and Site 5. That leaves a surplus of 230 places, which is the equivalent of improving spatial access to around 1,000 existing houses. The spatial pattern of secondary school in Trowbridge is such that all provision is currently to the W-SW of the town centre, although the implementation of Ashton Park would change this.
- 2.17 Paragraphs 26-27 state that the proposals for 'Trowbridge' should be premised on the delivery of a 'self-contained new community'. Whilst this sounds very 'snappy' we prefer a more grounded and nuanced characterisation. This does not reduce the place-making ambition in any way but rather more clearly articulates the vision/opportunity.
- 2.18 A strategic extension to the Staverton, Hilperton Marsh and Hilperton areas of the wider Trowbridge urban area can develop over time. This will comprise a series of neighbourhoods that will connect internally, but they also will also connect to existing neighbourhoods. In many instances the urban extension will have a closer relationship with existing areas of development than internally. The strategic extension will not be self-contained but it will include key service and facilities such as a primary school, secondary school and local centre. The degree of containment will increase when the area is evaluated of as part of Trowbridge as a whole. Indeed, there are recently funded cycling connections to Melksham (Tranche 2 : Emergency Active Transport Fund) that means the Bowerhill area, in particular, could be as much a location for non-car based travel to work as Trowbridge.
- 2.19 The predominant land use will be housing, and this location will perform an essential role in meeting current and longer-term housing needs for the housing market area.

- 2.20 Development can bring with it services, facilities, and commercial space of benefit not just to those who live within it but to those who already live within the area of Trowbridge/Hilperton. Whilst there will be significant change to the environment, the majority of the land is non-descript arable and there is huge scope to enhance the green infrastructure network of the area. National planning policy requires measurable net gains to biodiversity to be delivered. On-site bat mitigation will require significant green infrastructure pathways not only along the canal but through the other parts of the site. In addition, the requirement for nearly 38ha acres of Suitable Alternative Natural Green Space (for Site 5 alone), which is a country park scale ‘opportunity’ for the northern side of Trowbridge.
- 2.21 There is a synergy yet also a separateness between Sites 4 and 5 in forming a masterplan and delivery strategy. Given the elongated nature of Sites 4 and 5, a series of neighbourhoods/communities will emerge and these will also ‘engage’ with Staverton, Hilperton Marsh and Hilperton Village. It seems that Site 4 will have to look to Site 5 for secondary education provision.
- 2.22 The transport evidence base (Atkins) in respect of off-site matters (Staverton Bridge) is noted. This does not feature strongly in the Council’s main consultation document for Trowbridge. Thus, it has not itself commented on the Atkins report in the center of this Local Plan examination. It is important to understand the extent to which this is an existing issue (pre Local 2036 Local Plan). Lightwood and the landowners are mindful of the need to generate a shared understanding between all parties on this issue.

### **Concept Plans for the North-North East Trowbridge Area**

- 2.23 The Concept Plan for Sites 4 and 5 is expressed through eight separate plans:
- A Draft Framework Plan (Figures 2 and 6)
  - A Draft Green and Blue Infrastructure Plan (Figures 3 and 7)
  - A Draft Movement Plan (Figure 4 and 8)
  - A Draft Urban Design Principles Plan (Figures 5 and 9)
- 2.24 Paragraphs 35 and 36 identify that the Concept Plans are a way and one way that Site 4 and Site 5 could be developed, and that there are different ways. Consultees are invited to give their observations.
- 2.25 The Council’s intention is that ‘*further development*’ of the Concept Plan(s) will culminate in design codes, developed alongside masterplans to which applications would have to adhere.
- 2.26 At the outset, we expressed support for a specific master planning and design code process, with both pillars being subject to specific locally focused public consultation, with input from other relevant bodies, including statutory consultees. At this stage it is unknown whether Site 4 or Site 5

will come forward as a single joint outline planning application or two or more applications. A co-ordinated framework plan, phasing plan, and infrastructure delivery plan is the ideal way to proceed if delivery is to follow a Local Plan allocation. Landowners must however reserve the right to submit a planning application at any time, and in light of the Council's 5-year supply problems. It is for the Council to determine how to deal with such an application. Clearly, the presentation of an application within a technically justified masterplan would still be needed.

- 2.27 The wording of paragraph 36 in respect of *'further development'* is a little ambiguous but it is our expectation that a *'master planning and design coding process'* is viewed by the Council as a separate body of placemaking and design work to be prepared outside the Local Plan itself. Clarity is sought here.
- 2.28 Clarity is also requested in respect of whether the Council intends to undertake this *'further development'* within an SPD process or not (whether Council-led and funded, developer-led and funded, or collaboratively-led funded).
- 2.29 If an SPD process is not envisaged then a landowner/developer led and funded process will be required (to include public consultation), with the Council acting an 'overseer' and ultimately endorsing an end product. Again, we should like to establish clarity over the intended process. Based on sites in the Chippenham Site Allocations Plan, our expectation is that it will be for the developers to progress a co-ordinating masterplan that the Council endorses, with regular engagement on the way.
- 2.30 Any landowner/developer masterplanning and design coding process could take place in parallel with the later stages of the Local Plan process rather than waiting to begin until after the Local Plan is adopted. This would enable planning applications to be submitted closer to the date of Local Plan adoption, thus assisting with the timeliness of delivery. No housing trajectory has been provided, but it is clear that the Council is assuming that 1,600 homes of the 2,100-unit Site 5 are delivered by 2036. Assuming 150 per annum, with first completion in 2025 is not unreasonable at this stage, but would require an efficient master planning and application process that began during rather than after the adoption of the Local Plan itself.
- 2.31 Whilst we understand the consultation value in the Council 'painting an early picture' of how the land could be developed, we caution against the inclusion of the current suite of plans (even once adjusted after this consultation) in the Pre-submission Plan itself. A Local Plan examination (on the basis of the current planning system at least) is not the forum to be able to assess the technical justification for a masterplan, and thus, the inclusion of such plans would have to be so heavily caveated as being too susceptible to a high degree of change, that inclusion is unwarranted.
- 2.32 However, we do see merit in a first stage framework plan, (or framework 'options' plans) appearing in the Council's evidence base. The purpose of this evidence base would be to justify the assumed housing capacity of the site and to demonstrate that the site is capable of being delivered, including

the SANG strategy. The evidence base would be LPA 'owned' but landowners and developers would contribute to it.

- 2.33 At this time and for the benefit of other consultees, we must express that the Concept Plan within the consultation document has been unilaterally prepared by the Council without any engagement or input from [REDACTED] and [REDACTED]. Consequently, there is a failure to understand critical landowner perspectives at first principles stage. These perspectives need to be understood.
- 2.34 The Council has published no technical evidence as part of this consultation to justify the concept plans, nor any evidence of an optioneering process. The Council would not be expected to evaluate a concept plan without this background. Consultees, including landowners should have been presented with this information in order to comment more effectively, assuming it exists. No doubt there has been some professional assessment, and some of the ideas may ultimately be perfectly valid and indeed translate into a final masterplan, but that is not the point; the technical documentation justification is missing. It is acknowledged that the landowners have not, to this point, offered any vision for the development of their land within a wider strategic context but the emerging Local Plan now generates a basis upon which to do so.
- 2.35 We present our headline observations as follows, and present at **Appendix 2** a series of alternative Concept Plans that serve to illustrate the points that we make. Bullets **a-kk** need to be read alongside Appendix 2.
- 2.36 The key message is that there is still quite a lot of optioneering to be done, whether the red line for the allocations remains fixed or is extended. This optioneering does not affect the basic principle that a strategic expansion in this area is justified and achievable but it does require the Council to think about the extent of the allocation and the disposal of uses. It also calls into question what the draft Local Plan itself shows in terms of plans versus policy requirements, and what is hosted within the evidence base.

#### **Appendix 2 : Concept Plan Optioneering**

- a) The landowners only plan to make part of their land at Hilperton Marsh Farm available for built development.
- b) The landowners run a valued suite of commercial premises of various sizes at Hilperton March Farm. Some long-term tenants have moved into larger units as their businesses have grown. The commercial units will remain in situ and the landowners need to retain some flexibility to enable further growth during the plan period. Suitable buffers will be needed between the existing premises, any new premises and housing. Given the Council's in principle endorsement of North East Trowbridge land for strategic development, the landowner will accelerate its future business planning so that a first phase (evidence-based) framework masterplan can be

developed to justify housing capacity assumptions for consultation on the pre-submission Local Plan.

- c) The landowners live on the site and will continue to do so, even if most of the land is developed for housing. The orientation and outlook of the two residential dwellings in their ownership means that they wish to keep their two eastern fields free of built development, including a primary school. Ideally, the landowners do not want a spine road bisecting the business park and their properties from the canal. We calculate that around 4ha of housing land (up to 150-160 plots) would be lost from the net residential area, but that is the landowners choice. Consequently, further optioneering is needed to assess alternative primary school locations and the vehicular access and movement strategy.
- d) The proposed 2FE primary school is in any case probably too close to the school in Site 4. We recognise that the relationship of a new school primary site to the existing Hilperton C of E Primary school is also a consideration. There are other options that must be considered, either side of Whaddon Lane, including on other [REDACTED] land.
- e) The concept plan is rather ill conceived in respect of the assumption that a secondary access road could be driven from Marsh Road, through existing residential curtilages to [REDACTED] North Eastern field. Existing use values need to be considered for the affected properties, some of which have no wider stake in the allocation. Strategically, this issue is rather superseded by the 'no build' strategy to the north.
- f) There is no published evidence base to justify the performance of the primary access strategy along Marsh Road/Hill Road versus alternatives. Nonetheless we see the logic in presenting the proposed alignment and access points for discussion. The key features of the access strategy, for this Hilperton Marsh part of Site 5 are that the spine road connects to the Texaco roundabout and that there is a 'branch' that emerges to the east of Hillside Gardens.
- g) This access strategy means that the main landowner is not afforded its own primary (or secondary) access point despite a 475m frontage on to Marsh Road/Hill Street. The Concept Plan is therefore somewhat naive in respect of its understanding of the interplay between design and delivery. It will be necessary for [REDACTED] to achieve a primary access point if anything is to be delivered on Site 5. Consequently, the Hillside Gardens access would be changed to a secondary junction and the internal highway network rearranged.
- h) The landowners consider that a primary point of access is achievable at the confluence of Horse Road and their current access to the business park. Land for new junction arrangement and realigned spine road alignment is available between the main farmhouse and Marsh Road. This alternative strategy will of course need to be assessed to determine its performance.

- i) Whatever the alignment of the spine road, the emerging policy requires that it be designed for speeds 40-50m, yet capable of adaption for 20-30 mph speed limits.
- j) Firstly, we do not see how 'design speeds' can be justified in terms of soundness within Local Plan policy. The emerging policy should instead be focusing on the objectives of the spine road, and what it should and should not be designed to do, i.e it should be not become an equally quick route of choice between the A361 and Canal Road (as Elizabeth Way has been developed for that purpose). Nor should it be so tight, e.g. Cottles Barton in Staverton, so that it feels too pinched. We are more than happy to work with the LPA and highway authority to make sure that the highway design strategy is 'right' within an overall design vision for North East Trowbridge. We observe that the same basic spine road speed design requirement is applied to the strategic allocations at Chippenham, but the spine road here will have a more strategic function.
- k) On the 20m tree lined principle for the spine road, this clearly reflects emerging government guidance, but there are also some that say (rightly) that some of the best streets have no trees (Bath for instance). It may be the case that the road should have sections that are, and sections that are not, tree lined to vary the character. This is a detailed design matter and policy wording should reflect this. It may be the case that, for instance, 66% coverage is an agreed approach. Typical section drawings usually show shared cycle/pedestrian lanes within 20m main streets, but given the scope for off-road cycle routes, on desire lines which are preferable, there may be some flexibility in the width of the main spine road.
- l) The design principle also seems to be premised on the road being built in one phase with subsequent redesigns. This is perverse and has the potential to result in not the best placemaking (it is also cost inefficient). It could equally be the case that the spine is delivered phases alongside housing development. Phasing thresholds will of course need to be established in such a scenario.
- m) Clearly there are knock on consequences of moving primary access points, in conjunction with the land available constraints referred to under bullet (c). The alignment of the primary road network itself is affected and the placement of large land uses, such as secondary schools can also be affected. Equally, the development parcel (Yates/Barratt) off the Texaco roundabout could come forward as a stand-alone development, at least in term of vehicular movements (perhaps not re SANG and secondary school places) if there is a strategic shift in respect of the alignment main spine road. These matters require further investigation.
- n) The necessity of making adjustments to the primary access strategy, and the wider spatial effect on the alignment of the primary road network would likely affect the proposed secondary school site and the size of the school that could be accommodated. A relocated primary access

point is only of use if it enables [REDACTED] to run a spine road from Marsh Road into the field immediately adjoining and to the NW of the business park to them to gain control of the delivery of housing on their land. Of course, consideration needs to be had to the urban design of the spaces alongside that road as an entrance into the community. A secondary access may still be needed to the NE of Greenhill Gardens (where a primary access is currently shown).

- o) The secondary school site is around 6.4ha, but is wrapped in 2.4ha of residential land. Conceivably this location, as currently drawn, could accommodate a 5/6FE secondary school (minimum size) or an 8FE secondary school (referred to in the emerging policy wording) in lieu of the housing land. The proposed secondary location currently straddles two landowners ([REDACTED]) which has the potential to hinder rather than assist delivery. Further testing is needed but it is possible that the alternative, yet necessary, access strategy for the primary access point and spine road alignment has the potential to constrain the option for a larger secondary school in this location (or even a smaller one). The Oatley's also have concerns about the relationship between a secondary school site (large or small) and the security of its generally open access business park. Our overall conclusion, at this stage, is that the secondary school site can and should be moved to a more flexible location off the A361. Such a more flexible location is enjoyed by Abbeyfield (Chippenham) and Melksham Oak.
- p) As a consequence of (n) the primary school could move to part of the secondary school site (or elsewhere if optioneering suggests other options are available), and for this area to also deliver housing. The relocation of a/the local centre to this location is also an option. Equally it could be located a little deeper into the site. Off the spine road itself. The function of a main local centre needs to be considered, and there may be scope for a second smaller parade of shops. All this needs testing from a variety of perspectives (walkable neighbourhoods versus the size of the market to support different levels of commercial space, including form within the existing built-up area).
- q) On the issue of the actual in-principle size of the secondary school, we subscribe to the need for a new school at Trowbridge to serve a future phase of development. However, we reject a policy stipulation, at this stage, that the school must be 8fe in size, despite understanding why the Council, corporately, is looking at something bigger (i.e. how to best to spend £8.5m in S106 contributions for secondary provision from the Ashton Park allocation and other allocations from the Aston Park site, where a 5Fe is planned). Ongoing engagement with the Council is requested on this matter.
- r) A 5fe school and the requisite contributions to its construction would allow Sites 4 and Site 5 to come forward in full, whilst still generating around 230 surplus places that could be taken up by other children in the area. It would be unsound to stipulate the need for more than a 5FE school

at this time. Any additional land for a larger than necessary school, would surely have to be acquired, reflecting the opportunity cost to the landowner(s). This may narrow the cost efficiency gap between two 5fe schools and one 8fe school.

- s) Further testing is needed, but the larger the secondary school (where presently located), and in light of the land ownership and access considerations presented above, the more likely the overall delivery consequences for North East Trowbridge. Moving the location of the secondary school needs to be considered.
- t) Ultimately, Lightwood consider that the secondary school should be located off the A361, utilising [REDACTED] and/or other land ownership outside Site 5 or washing Site 5 over a wider area.
- u) Co-locating a new secondary school with the Rugby Club and the planned Trowbridge Town Council 3G pitch makes a lot of sense, of itself, and in respect of the wider master planning of the core of the current Site 5 site (in light of comments above). This general location, bearing in mind one is talking about secondary school aged children, not primary school children, is still walkable and cyclable from Site 5 and the existing urban area, and indeed Semington. Off-road connections through Site 4 and Site 5 will be plentiful and we are aware of the tranche 2 Emergency transport fund that has been secured to connect Hilperton to Semington (and on to Melksham). This optimizes the use of the existing byway network to the east of the site. It also follows/links to the A361 cycling project to the south west of the Elizabeth Way/A361 roundabout.
- v) Moving the secondary school brings into play the logic of extending the allocation to include some or all of the land north of the Rugby Club, that wraps around to the A361, for a mixture of built development, open space and another strategic access option into the main body of Site 5. This would reduce/remove any reliance on the single southern primary access point off the Devises Road roundabout as currently shown on the Council's plan. This land, if available, is a valid consideration even if the secondary school does not move. The landowner concerned also has land within the allocation itself. We are aware of some archaeological potential in this area, but not the precise constraint (record or preserve). Even in a preserve context the interest would only form a partial constraint given the size of this area.
- w) The observations in bullet (v) should be linked by the reader to our spatial strategy observation in respect to of the role of Trowbridge in its HMA. Here we said that housing supply was erroneously being exported to other parts of the HMA. Linked to this, paragraph 29 of the Trowbridge Settlement Statement refers to Site 5, as currently defined, as forming a new long term boundary for the town (along the Whaddon Lane byway east of the Rugby Club).

- x) We disagree. Once Trowbridge reclaims its reasonable share of HMA growth during the plan period and/or once the land to the east of the byway comes into play for this and/or other reasons, the town will grow toward the Hilperton parish boundary (but probably never cross it, with transmission lines forming a significant constraint). That will close the Semington gap, but not the extent that the gap between Trowbridge Southwick/North Bradley has been closed by planned development. In short Semington still retains its separate identity. The risk for the Council is that if it is not to expand the allocation then it is quite likely that this land will be developed (off-plan) between phases of plan review, i.e. through 5 year land supply failure. Thus, there is merit in the Council maintaining control by allocating and controlling, through policy, a wider area. The additional homes will generate contributions value to infrastructure that is said to be needed anyway (Staverton bridge).
- y) Based on the Council's logic, if the Whaddon Lane byway was to be the long-term boundary then it would be the Green Belt at Trowbridge 'to go next'. Quite simply we say that the land east of Whaddon Lane still trumps the Green Belt when seen 'attached to Site 5'.
- z) Another key transport theme relates to the Whaddon Lane - Church Street/Hill Street Junction. For several parts of the Site 5 Allocation this is the natural desire line to Trowbridge but the junction is clearly limited and development has the potential to introduce traffic back into 'old' Hilperton, albeit not to the level of traffic that will have been removed by the implementation of Elizabeth Way. Nonetheless, we support vehicular traffic controls along Whaddon Lane. Existing properties served from it, including those in Whaddon will of course need to achieve access and a detailed design phase required to ascertain a long term strategy and how to achieve this.
- aa) The interface of Site 5 either side of Whaddon Lane is around 400m giving a lot of scope for the alignment of a 20m wide spine road, with consequential effects for the argument of development blocks and the central GI spine. In short there are quite a few ways to cut this.

Suitable Alternative Natural Greenspace (SANG)

- bb) Around 38ha of SANG is needed for 2,100 homes within Site 5 (assuming that the Texaco roundabout site is captured by SANG too). At present the emerging Local Plan does not require SANG for Site 4, but the small print of the Trowbridge Bat Mitigation SPD implicitly suggests that there is a high risk SANG being required following survey. If so, then a further 500 homes would generate an overall need for 47.2ha.
- cc) Within Site 5, the 100m canal buffer, with 3.5km circular walk, is purported to represent part of the SANG provision for Site 5. We estimate that this strip is around 18ha. However, based on our experience in the Thames Basin, this format of provision is unlikely to be regarded as 'suitable' provision that would be endorsed by Natural England. It is likely to be too narrow /linear as part

provision. Although it links to other strategic open spaces within Site 5 (central corridor) and Site 4, these are not SANG areas but other strategic open spaces.

- dd) However, during the course of this consultation the SANG strategy has come increasingly into focus. Site 6 was one of the shortlisted locations for built development and actually performed well in the Sustainability Appraisal, save for a lack of placemaking connectivity. That would change if the land around the Rugby Club was brought into play, but its proposed role is somewhat different.
- ee) The land between the A361 and A350 (Hag Hill), once landscaped, presents itself as the optimal SANG solution and can at the same time achieve major, landscape scale, ecological enhancement of benefit to the SAC. A new Country Park of around 63ha (functioning as SANG) could be provided.
- ff) Consequentially the canal side buffer can be reduced to that which is needed to mitigate for bats. We understand that a minimum buffer of 45m has been determined but seek to have this confirmed, as the 'riverside' guidance for development and lighting in Bath regarding bats is less onerous. The canal side still offers the scope, with buffer of 45m to form a major part of the GI strategy for the site.

#### Renewable Energy Provision

- gg) ██████████ accommodate 10MW solar farm on 23ha to the east of Site 4. Had the farm not been developed then this land could conceivably have been part of an expanded Site 4 allocation.
- hh) The solar farm generates enough electricity to power 2700 homes based on average consumption rates. We calculate that ██████████ could accommodate around 1300 homes within Site 5 and are therefore off-setting the consumption of these homes, whilst also putting a net 1400 units worth of power back into the grid. Whilst there is not 'cable' connecting the facility to the land, this is unnecessary in the grand scheme of things as the credits for offsetting is the same as for direct power. For example, who's to say that the power that ██████████ land generates does not find its way back to the site from the grid!
- ii) As far as ██████████ are concerned they have more than met their renewable energy obligations that are generated by their share of Site 5. Rather like advanced structural planting mitigation in anticipation of site promotion/development, ██████████ have done the same for power. We trust the Council will credit the landowner for being ahead of the game in terms of achieving carbon neutrality.

### Other Issues

- jj) Some smaller peripheral landowners within the allocation ( [REDACTED] ) have their land are identified for only open space. This is unrealistic, given existing development and use values.
  - kk) Where, in Appendix 2 our indicative secondary internal road network connects to branches of the spine road, a modal filter/point closure would stop motorists taking a short cut through a lower tier street. The principle is to connect them by walking and cycling but minimise 'through routes' for car the car.
- 2.37 In commenting on the Concept Plan, our critique/narrative results in the headline conclusion that the Site 5 allocation should be extended to encapsulate land either side of the A361. To the east of the A361 a new county park/SANG be created. To the west, development should wrap around the Rugby Club to link the County Park into the rest of allocation. The prevalence of current and planned cycling routes means that this location will be very well connected internally and to the wider area. We have set out the key landowner perspectives that need to be accounted for when master planning this area. The Council is advised to engage with landowners and developers throughout 2021 to work up master planning options within the evidence base alone. These would inform the Draft Local Plan but not feature with it.
- 2.38 The Draft Local Plan itself should perhaps revert back to the approach seen for the Chippenham Site Allocations Plan so as not to generate additional levels of detail that is best set out as background evidence informing the Local Plan rather than being presented within it.



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08 March 2021

Dear Sir/Madam

## **Representations to the Wiltshire Local Plan Review consultation**

This letter of representation has been prepared on behalf of our client Edenstone Homes Ltd in response to the Wiltshire Local Plan Review which is running between 13th January and 9th March 2021.

By way of background, Edenstone is promoting land at Ridgeway Farm (to the rear of Athelstan Park), Crudwell for residential development and has been since 2014. A site location plan is enclosed with this letter.

This letter provides our comments in respect of the Council's Emerging Spatial Strategy (ESS) and 'Empowering Local Communities' Paper as part of Wiltshire Council's Local Plan Review.

### Comments on the Emerging Spatial Strategy

The ESS predicts 40,840 and 45,630 new homes will need to be delivered in the plan period, 2016-2036. In order to meet those needs, we note that the ESS is seeking to reply upon the existing settlement hierarchy contained at Core Policy 1 of the Wiltshire Core Strategy (WCS) and proposes that the primary focus for growth should remain at Principal Settlements, followed by Market Towns as set out in the WCS.

At paragraph 2.1 of the ESS it is stated that a sustainable pattern of development and how growth is distributed appropriately continues to be an important means to help address climate change. As a result, it is stated that the focus of growth will largely be at the main settlements of Chippenham, Salisbury and Trowbridge.

Edenstone acknowledge and fully support the need to address the climate emergency and that this should clearly form a key objective of the Local Plan Review. However, seeking to address such an objective by primarily directing the majority of development to the current main settlements should not be seen as the only means of addressing the climate emergency.

It is our opinion that a more multi-faceted approach to the spatial strategy is required. In particular, we would note that by not positively enabling proportionate growth to the more rural areas of Wiltshire as part of the Local Plan Review, specifically within the Large and Small Villages, this may only serve to continually stifle the ability for these

locations to offer the ability to make trips by public transport where bus services often become more limited due to dwindling populations and a lack of patronage. By actively planning for new development in these locations, there are better prospects of securing the benefits of well-planned growth for the rural villages and settlements. Such development can support the sustainability of these communities and provide a number of benefits including the provision of local market and affordable housing, new employment opportunities, improved infrastructure including walking, cycling and the viability of public transport connections to larger towns and urban areas. It also supports the vitality and viability of local services and facilities such as local primary schools, pubs, shops and can help to secure greater broadband connectivity.

Indeed, the NPPF states that to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. It requires planning policies to identify opportunities for villages to grow and thrive, especially where this will support local services. Furthermore, it notes that where there are groups of smaller settlements, development in one village may support services in a village nearby. Therefore, it is respectfully suggested that the approach to the ESS should be further reviewed, taking this points into account.

Furthermore, following changes to national planning policy in 2019 the NPPF now identifies that at least 10% of new homes should be delivered on sites that are no larger than one hectare in size (paragraph 68). The importance of bringing forward growth for small and medium-sized sites is therefore clear and it is suggested that the Local Plan Review should consider how this requirement could be met particularly at the Large and Small Villages in Wiltshire. Such an approach can help to reduce the risk of reliance on speculative planning applications and can help to bolster the housing supply when the delivery of large sites is unexpectedly delayed. This is a pertinent point given that the development of the 'Ashton Park' allocation in the WCS to the south east of Trowbridge has been significantly delayed, contributing toward a 1,297 shortfall in housing for the District and contributing to the Council's inability to currently demonstrate a five year housing land supply. Equally, the delivery of 'Hampton Park' within Salisbury has been delayed, which proposed to deliver 500 new dwellings.

Finally, we note that paragraph 2.8 of the ESS acknowledges the impact of COVID-19 as being likely to increase home working permanently, reducing net out commuting to other settlements and boosting local demand for many goods and services. Edenstone welcome this acknowledgement. However, whilst the ESS then goes on to state that this "*may create opportunities to reconsider how we use town centres*" it does not go on to identify how this has implications for the spatial strategy in the more rural areas, including at Large Villages. It is considered that this is an important point, as people's travel and commuting patterns have clearly altered and the proposed strategy for growth must also take this into account when considering where is suitable to direct development.

#### Comments on the Empowering Local Communities Paper

Whilst it is encouraging to see the Council has dedicated a detailed document to 'Empowering Rural Communities' the strategy and approach set out within that document identifies a limited range of circumstances in which new

housing can come forward in such locations. It essentially replicates the stance of the WCS which revolves around meeting local needs, such as to provide affordable homes and local jobs and services.

It is considered that the Council should instead be looking to encourage incremental and proportionate growth to the more rural settlements, particularly the Large and Small Villages, to ensure their continued vitality and sustainability over the new plan period. This should be in addition to setting a framework that supports neighbourhood planning and community led housing.

Whilst it is appreciated that the preparation of Neighbourhood Plans can play an important part in this, it should also be recognised that the preparation of Neighbourhood Plans rests with the local communities to have the ambition and resources to produce and engage with the planning system in making a Neighbourhood Plan, or to comply with the stringent tests in achieving a community led affordable housing scheme. In our opinion, the approach set out in the 'Empowering Rural Communities' document will therefore not necessarily have a direct positive impact for all communities and may not necessarily truly reflect the need for new housing or community facilities in these locations.

In preparing a document specifically relating to empowering rural communities it is clear the Council is aware that there is a lack of growth in rural areas, however the strategy and policy provisions being proposed within that document and the ESS are, in our view, insufficient to ensuring the vitality and viability of these villages is maintained and enhanced in line with the advice contained in the NPPF. Furthermore, they are unlikely to be sufficient to address the affordability issues that many of the more rural areas are experiencing in Wiltshire.

Overall, it is considered that the Local Plan Review should be seeking to maximise the opportunities for development in locations that not only have good walking, cycling or public transport and digital connections to access key services and facilities, but to those that support the rural communities and help to promote the sustainability of those settlements, in accordance with the advice contained in the NPPF. In adopting a more considerate approach towards the role of rural settlements, the Local Plan will also play a more long-standing role towards addressing the issues of climate change.

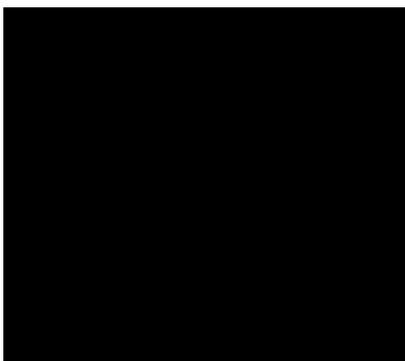
### Conclusion

As set out above, Edenstone is concerned that the ESS is seeking to continue to direct growth toward the Principal Settlements and Market Towns as the current WCS does. However, the majority of those settlements have already received a significant amount of growth and there are existing allocations within the WCS that are yet to come to fruition that continue to be identified as part of the ESS. It is considered that by replicating the WCS strategy this is likely to impact on the Council's ability to maintain a five year housing land supply in the future but also stifles development in the more rural areas, such as the Large Villages, hampering their vitality and sustainability as well as potentially worsening the affordability issues experienced in these areas.

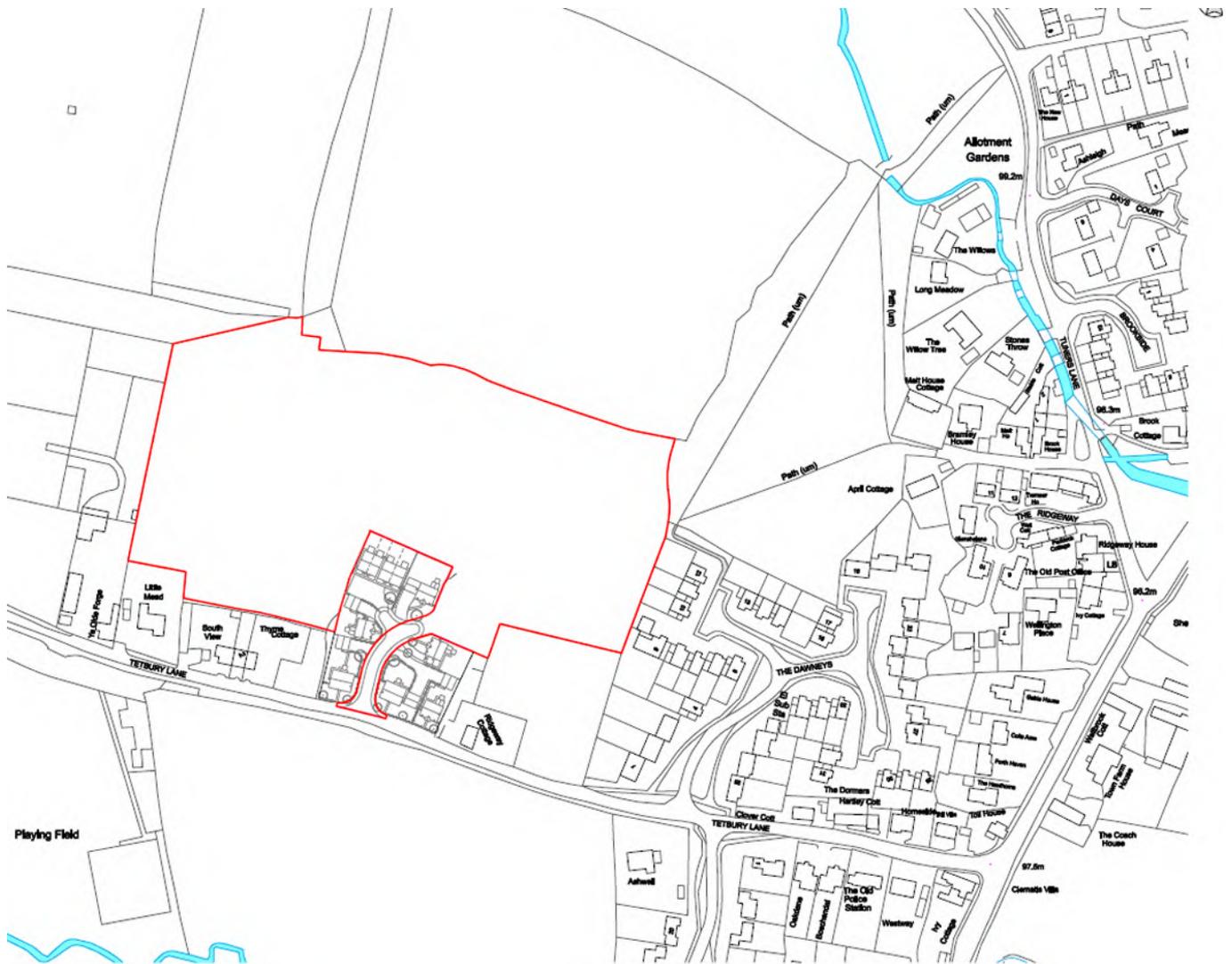
The Local Plan Review presents an important opportunity for the Council to reconsider its spatial strategy and take a 'plan-led' approach to potential growth in the rural communities. Planning for some level of growth in appropriate rural villages and settlements, in addition to encouraging the preparation of Neighbourhood Plans, will play a critical role in making sure that the long-term vitality vibrancy and overall sustainability of Wiltshire's rural communities is maintained and secured for the future.

We trust the above representations will be given due consideration and we would be grateful if we could be kept informed of any further consultations on the Local Plan Review.

Yours sincerely,



Site Location Plan – Land at Ridgeway Farm (to the rear of Athelstan Park), Crudwell



**STRAT357**



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Date: 09 March 2021

Dear Sir / Madam,

## **The Wiltshire Local Plan: 13 January to 9 March 2021**

Thank you for the opportunity to comment on the above document. These representations are made by NHS Property Services (NHSPS) to Wiltshire Council (“the Council”) in respect of their New Local Plan.

### **Foreword**

NHSPS manages, maintains, and improves NHS properties and facilities, working in partnership with NHS organisations to create safe, efficient, sustainable, modern healthcare and working environments. NHSPS has a clear mandate to provide a quality service to its tenants and minimise the cost of the NHS estate to those organisations using it. Any savings made are passed back to the NHS.

A key part of NHSPS’ role relates to the provision of new healthcare facilities with the goal of ensuring that the healthcare needs of communities can be met. NHSPS works with commissioners, care providers and local councils to identify and respond to local healthcare and property needs. As such, it is involved in the acquisition and development of new facilities, and the redevelopment of existing facilities. Furthermore, NHSPS is required to dispose of land and property assets or facilities that have been identified as surplus to NHS requirements by Commissioners. This has resulted in the sale of 441 surplus properties, generated £381 million of sales receipts for the public purse and contributed to land sales supporting 6,607 housing units since April 2013.

### **Meeting NHS and patient requirements in Wiltshire**

The NHS estate in Wiltshire is both large and varied, reflecting the wide range of services provided by the health system. It is also of variable age and quality. To invest in patients and new services, the NHS must reconfigure its estate in accordance with commissioning and operational requirements. Planning and planning policies can play a key role in helping to shape NHS strategies and facilitate this ongoing investment in public services. This can be achieved by prioritising planning applications for new health facilities and creating policy frameworks which provide flexibility, assurance, and funding for the NHS.

In Wiltshire, this will require ongoing collaboration between NHS bodies and the Council to deliver and plan for new health facilities to support the ambitious levels of growth anticipated by the Council. The Council should be alive to this and can play a key role in helping to secure an equitable share of funding from large housing developments coming forward in Wiltshire.

The Emerging Spatial Strategy for Wiltshire must guarantee appropriate funding is consistently collected through developer contributions for health and care services in order to meet growing demand. This must provide clear support for the NHS to plan for and fund appropriate changes to service infrastructure. Providers, commissioners, public health and planners must work together to plan service provision in areas of growth, separating out money for the NHS is a vital step.

Alongside this, the NHS will seek to make the best use of land and property to enable ongoing investment in services while making an important contribution towards overall housing need in Wiltshire. Wiltshire's planning policies should seek to support these aspirations and not unnecessarily constrain NHS land through the planning process.

## **NHS Development Sites**

There are numerous sites coming forward as part of the reorganisation of NHS property in Wiltshire, and NHSPS is in a unique position to help deliver new healthcare facilities alongside rationalising surplus sites for alternative uses.

NHSPS has been working closely with BANES, Swindon & Wiltshire Clinical Commissioning Group (BSW CCG) and other healthcare providers to develop plans for two new health facilities in Trowbridge and Devizes. Both Trowbridge Integrated Care Centre and Devizes Integrated Care Centre (ICC) have been progressed through to outline planning permission. Together, they represent major investments in Wiltshire's health system and the delivery of key pieces of infrastructure envisioned in the Wiltshire Infrastructure Delivery Plan 2016.

These projects also represent an exciting opportunity to unlock land and deliver new homes on surplus NHS sites in Wiltshire. NHSPS will be working to secure the residential development adjacent to the new Devizes ICC on Marshall Road, while unlocking the residential development potential on the old Devizes Community Hospital site. Similarly, Trowbridge Community Hospital will close once the new facility opens, and NHSPS will begin exploring how to make best use of this surplus NHS asset.

NHSPS have also been considering future plans for Southgate House, Devizes and an area of land at Rowden Hill, Chippenham Community Hospital. These, and the aforementioned sites are all reviewed in turn below and we would welcome a conversation with the Council to discuss them further.

## **Trowbridge Integrated Care Centre**

The application site for the new Trowbridge integrated care centre is the remaining undeveloped extent of the land allocated under saved policies CF8 and R7 for Community Health facilities in Trowbridge. Its development for the delivery of new and improved health facilities represents the completion of an extant site allocation envisioned in 2004.

The development will replace the old Trowbridge Community Hospital and provide additional space for enhanced primary care services locally. It will enable extended provision of integrated health care services in a new modern healthcare facility which will also enable clinicians to deliver excellent patient care in an enhanced environment.

Outline Planning Consent to develop this site for a new health care facility was granted on 15 January 2021 and NHSPS is now moving forward with the submission of reserved matters.

Subject to business case approval, construction of the new building will complete in spring 2023 and it will be open to patients shortly thereafter.



Trowbridge integrated care centre

## **Devizes Integrated Care Centre**

Plans for a new ICC on land off Marshall Road are being developed. An outline planning permission to develop the site for a new health facility and up to fifty residential units was approved in May 2018.

A subsequent reserved matters planning application for the ICC only has been submitted to Wiltshire Council to confirm the appearance, design, layout and other details of the health facility.

The new facility will accommodate the services currently provided at Devizes Community Hospital alongside significantly increased primary care capacity, out of hospital urgent care services, enhanced extended hours services provision, and an expanded range of other health care services.

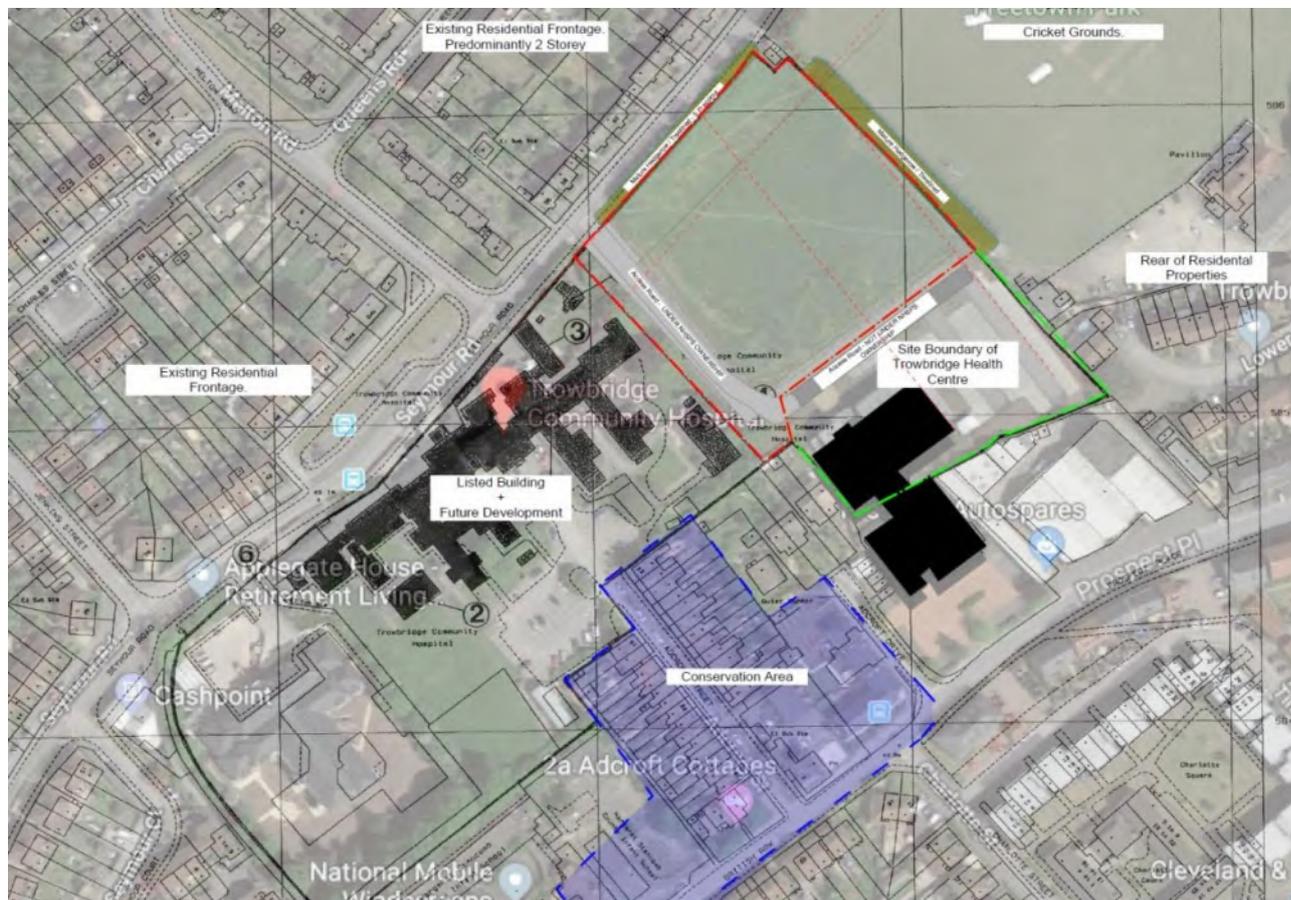
Patients, carers and staff will benefit from modern, joined up healthcare provision within a significantly enhanced environment, increasing the local ecosystem of healthcare accommodation alongside Devizes Treatment Centre. Subject to business case approval, we will complete construction of the new building in Summer 2022, and it will be open to patients shortly thereafter.

The remaining land will be sold for residential development under a new outline application.



Devizes integrated care centre

## Trowbridge Community Hospital, Trowbridge



Site context: Existing Community Hospital and site of new integrated health centre (red outline)

### Existing site

Trowbridge Community Hospital is a 2.06 hectare site in Trowbridge owned by NHSPS. The site currently comprises healthcare facilities and one listed building, while abutting a conservation area to the south.

The site's immediate context is set by individual residential properties, a soon to be built integrated care centre and the extended Trowbridge health centre. The plot to the south west of the site has recently been developed for retirement living development, three storeys in height and comprising twenty-five one and two bed apartments.

### Opportunities

The relocation of services into the new ICC will unlock an exciting opportunity to make the best use of a surplus NHS site, representing the next stage of investment and improvement in this part of Trowbridge. NHSPS is currently reviewing development options for the existing community hospital and will seek to establish a suitable future use prior to disposal for best value. This process will allow for critical

reinvestment and cost savings that will allow health services to improve, while relieving pressure on other parts of the NHS.

NHSPS will be involved in future proposals for the site and will look to engage the Council soon. A scheme will be prepared that makes a positive contribution to the built environment of Trowbridge and the best use of this NHS asset.

The site is considered available, suitable, and deliverable within the 1-5 year period of the plan. We would therefore welcome the inclusion of a site allocation for Trowbridge Community Hospital which confirms the principle of residential, care or mixed use redevelopment.

### **Devizes Community Hospital, Devizes**



Devizes Community Hospital

## Existing site

The Devizes Community Hospital site is owned by NHSPS and located to the north of Devizes Town Centre. The c 0.84 hectare site houses a number of medical services operating from several single-storey buildings to the west of the site, as well as two original two and three-storey buildings to the east of the site.

The site is accessible via New Park Road to the east and Couch Lane to the west and is serviced by two areas of car parking. The eastern portion of the site, including the two original buildings, is within the Victoria Road Conservation Area.

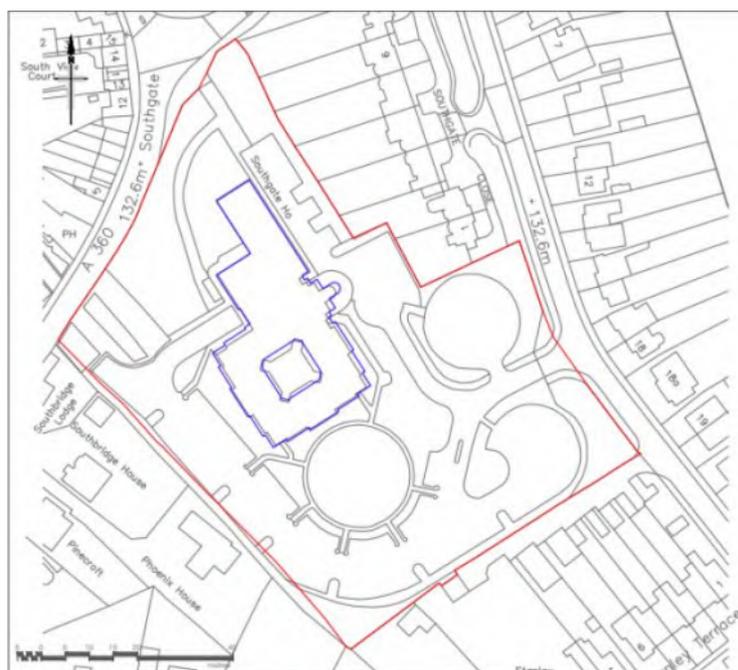
## Opportunities

The existing hospital is no longer suitable for the delivery of modern healthcare services. Upon completion of the new Devizes ICC at Marshall Road, all services currently provided at the Devizes Community Hospital will be relocated to the new centre.

The site is in a sustainable location, within an existing residential area and within easy walking distance of Devizes Town Centre and public transport services. This site represents an opportunity to provide an accessible, sustainable residential development on under-utilised previously developed land.

The site is considered available, suitable, and deliverable within the 1-5 year period of the plan. We would therefore support the inclusion of a site-specific allocation for the Devizes Hospital site which confirms the principle of residential redevelopment.

## Southgate House, Devizes



Southgate House

### **Existing site**

The Property is located in Devizes in the centre of Wiltshire on Potterne Road and is owned by NHSPS. The site is approximately 0.3 miles south of the town centre and is bounded by Potterne Road (A360) to the north and west and Pans Lane to the east.

The land extends to 1.42 hectares and the Property consists of a purpose built detached office complex, with a Class E use class. The Property was built in the 1990's and is two storeys but includes a mezzanine area above the conference room. The Property is broadly rectangular in shape and occupies less than a quarter of the site. Currently, pedestrian access to the site is via the A360 and Pans Lane, whilst vehicular access is solely via Pans Lane.

### **Opportunity**

The existing property is a purpose built office which has been used by the NHS since the 90s. We can confirm that the Property will be declared surplus to operational requirements by the NHS and NHSPS plan to have vacant possession in the early part of 2022.

There are no existing planning constraints identified onsite and NHSPS will be seeking to secure best value prior to disposal. The site is considered available, suitable, and deliverable within the 1-5 year period of the plan and benefitting from permitted development rights to convert or be demolished and replaced by flatted development. It is however felt that the site could deliver a more appropriate scheme as a holistic redevelopment. We therefore request the inclusion of a site-specific allocation for the Southgate House which confirms the principle of residential redevelopment.

### **Land and buildings 49,51 & 53 Rowden Hill, Chippenham Hospital, Chippenham**

#### **Existing site**

Land and buildings at Rowden Hill are owned by NHSPS and lie to the west of the main Chippenham Community Hospital Site, but do not include the wider site. The site comprises some Listed buildings and undeveloped parcels of land to the east and the south, totalling c.1.3 hectares. Current access to the site is provided via the main access route via St Francis Avenue, a small side road of the A4. The A4 links the site to Chippenham Town Centre and the A350, a primary arterial route in the area.

#### **Opportunities**

The surrounding area is predominately residential, with the commercial area of Chippenham a short drive from the site.

To the east of the site, is the remainder of Chippenham Community Hospital Site, which comprises healthcare facilities and some listed buildings. The site's southern and western site boundaries are defined by the rear of residential properties.

A major site allocation lies adjacent to the east of the wider Community Hospital Site, and a mixed use outline application has been approved on this land, including up to 1,000 dwellings and a new Riverside Park.

The site is clearly therefore in a sustainable location and considered suitable for development. Should any part of the Rowden Hill site need to be reconfigured or declared surplus to operational healthcare requirements within the next 15 years, it should be considered suitable for alternative uses including new residential/healthcare/commercial or care home development, depending on healthcare commissioning needs.

## **Closing**

The NHS is actively investing in healthcare services and buildings in Wiltshire and have worked closely with the Council to deliver essential NHS services and facilities in Trowbridge and Devizes. We would urge the Council to recognise the opportunity this brings and harness the potential for future investment in the emerging Local Plan.

These projects have been driven by improving patient services and the need to modernise the healthcare estate and integrate services. The Local Plan can continue to foster this investment and we would welcome a conversation with the Council to help realise this potential.

We trust these representations are informative at this stage of the new Local Plan preparation and will be taken into consideration. Should you require any clarification on the issues raised in these representations, or more information on the sites submitted, please do not hesitate to contact myself.

Yours sincerely,



NHS Property Services

**STRAT358**

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# Representations to the Wiltshire Local Plan Review 2016 - 2036

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Representations prepared by Savills on behalf of  
St. Modwen Developments & Messrs Sealy

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## 1. Introduction

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- 1.1 These representations have been prepared by Savills on behalf of St. Modwen Developments Ltd (SMD) & Messrs Sealy in response to a consultation on the Wiltshire Council (WC) Local Plan Review (LPR) 2016 – 2036: Emerging Strategy.
- 1.2 SMD & Messrs Sealy have a land interest in an area of land located south-east of Junction 17 (Chippenham) of the M4 Motorway. It is split across the following two parcels of land:
- Site A - known as St Modwen Park Chippenham; and
  - Site B – known as Land to the north of St. Modwen Park Chippenham.
- 1.3 This land is labelled on the accompanying Site Location Plan attached at **Appendix 1**. Both sites falls within the jurisdiction of Wiltshire Council.
- 1.4 Outline consent was granted at Site A in August 2017 (LPA ref: 17/03417/OUT) for up to 1,000,000 sq. ft. Class B8 (storage and distribution) employment space and associated infrastructure. The consent was principally assessed against Core Policy 34 and was determined to be *‘essential to the wider strategic interest of the economic development of Wiltshire’*.
- 1.5 Site B represents a further development opportunity as a future expansion of St Modwen Park Chippenham, which is already served by an enhanced vehicular access delivered as part of the permission for Site A. It is contained on all sides by either significant highway infrastructure or existing/consented employment uses.
- 1.6 Following a review of the LPR and its evidence base, it is considered that the economic evidence underpinning the plan is both out of date and fails to fully assess and respond to the economic potential of Wiltshire to help meet regional and national employment needs. Given the district’s advantageous location in the south of England, with the M4 corridor traversing the north of the County, the absence of a broader assessment of market demand for industrial and logistics (I&L) uses represents a deficiency in the evidence base and a missed opportunity for the Council.
- 1.7 Our comments on the consultation and supporting evidence base are set out below and are made in accordance with paragraph 35 of the NPPF, to assist in ensuring that the LPR is found sound when examined in the future. We note that there is an ongoing consultation in regard to the changes to the NPPF, and that it is likely, given the published timelines for the LPR, that these will be made prior to the LPR reaching a sufficiently advanced stage, and thus it will be this revised Framework upon which the LPR will be examined.
- 1.8 These representations focus on the questions/ ‘thought provokers’ set out in the LPR and are structured as follows:
- Section 2: Planning Policy Context: Plan-Making;
  - Section 3: National Context;

- Section 4: Response to Emerging Spatial Strategy;
- Section 5: Employment Land – Proposed levels of growth for Wiltshire;
- Section 6: Potential locations for development;
- Section 7: Policy for Site A;
- Section 8: Site B Submission;
- Section 9: How to secure the opportunity at Site B in the plan;
- Section 10: Conclusion.

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## 2. Planning Policy Context: Plan-Making

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- 2.1 The National Planning Policy Framework ('the NPPF', published February 2019) sets out the government's guidance towards the preparation of local plans and decision-making.
- 2.2 The NPPF establishes that plans should apply a presumption in favour of sustainable development. For plan-making this means that (a) plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change; and (b) strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas.
- 2.3 At Paragraph 31 of the NPPF, the document states that the preparation and review of all policies should be underpinned by relevant and up-to-date evidence base. This should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned, and take into account relevant market signals.
- 2.4 Paragraph 35 of the NPPF establishes that when a plan is submitted for examination it will be assessed to confirm that it is "*sound*"; this includes the requirements that a plan is positively prepared; justified; effective and consistent with national policy.
- 2.5 The online Planning Practice Guidance (PPG) is an online resource which provides additional advice and guidance towards the preparation of local plans. The PPG is referenced within these representations, and wider submission documentation where relevant.

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## 3 National Context – Industrial and Logistics

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### National Planning Policy and Guidance

- 3.1 As part of building a strong and competitive economy, paragraph 81 of the NPPF states that planning policies should be flexible enough to accommodate needs not anticipated in the plan, and to enable a rapid response to changes in economic circumstances. It is our clients' view that the LPR fails to provide an appropriate range of employment sites across the Wiltshire administrative area, or provide the necessary policy certainty to encourage appropriate economic development during the plan period that was not identified during the drafting of the Plan.
- 3.2 Paragraph 82 requires planning policies and decisions to recognise and address the specific locational requirements of different sectors. This includes making provision for clusters or networks of knowledge and data-driven, creative or high technology industries; and for storage and distribution operations at a variety of scales and in suitably accessible locations.
- 3.3 The online Planning Practice Guidance (PPG) notes that the logistics industry is *“critical in enabling an efficient, sustainable and effective supply of goods for consumers and businesses, as well as contributing to local employment opportunities”*<sup>1</sup>. The guidance emphasises that the industry has *“distinct locational requirements”*, and that policies for logistics should be formulated *“separately from those relating to general employment land”*.
- 3.4 This section of the PPG adds that *“strategic facilities serving national or regional markets are likely to require significant amounts of land, good access to strategic transport networks, sufficient power capacity and access to appropriately skilled labour”*. The guidance encourages collaboration with other local authorities, infrastructure providers and other interests to identify the scale of need across the relevant market areas.

### Regional/national/international market position

- 3.5 Savills Industrial Agency and Research teams monitor the UK logistics sector and provide commentary on the anticipated growth arising from demand and supply trends across the country, including the M4 corridor. The following statistics are taken from the report titled *‘Savills Research: The Growth of UK Logistics’*.
- 3.6 The UK logistics market has traditionally been focussed in and around the centre of the UK. This stems from the fact that retailers could locate their distribution warehouses here and reach a large proportion of the population within a four hour drive. However, that traditional market is rapidly evolving.
- 3.7 The logistics sector is now a key contributor to the UK economy, contributing £78bn of Gross Value Added (GVA) to the UK economy in 2019. Between 2014 and 2019, the number of businesses in the sector grew by 66%. By comparison, total businesses in the UK grew by 20% over this time.

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<sup>1</sup> PPG paragraph 031, Reference ID: 2a-031-20190722

*Rise of e-commerce:*

- 3.8 Online shopping, including grocery shopping, has been on the rise for over a decade due to digital innovations and changing consumer habits. Data from the ONS shows that over the last decade internet sales have accounted for increasing percentages of total retail sales, from around 6-7% in 2010 to around 20% in early 2020. The most recent data shows the impact of the country-wide lockdown following the outbreak. ONS data indicates that at its peak in May 2020, a third (33%) of all retail sales had been conducted online, and that change appears to have solidified with levels still at 27% in August 2020.
- 3.9 According to Savills research, by the end of 2021 the share of all online sales is expected to normalise at 24.3% in the UK, well above the pre-Covid trend, and continue growing from this higher base. This compares to 15.3% on average in Western Europe, while in the US the 2020 share is expected to rise to 20%, compared to a pre-Covid forecast of 16.9%<sup>2</sup>.
- 3.10 Whilst the UK has higher proportions of online shopping than other countries, there is less floorspace per capita with limited space to accommodate the stock. This indicates that further floorspace growth is likely in response to the recent increase in online sales in the UK. Furthermore, as the UK is more densely populated with tighter available land compared to much of Europe, it is even more important to adequately plan for the future availability of sufficient industrial land.

*Demand:*

- 3.11 As a result of the growth, the demand for warehouse space has risen dramatically in recent years. In 2009, the average amount of space transacted annually in 2009 was c.430,000 square feet. By the end of 2019, the average amount of space transacted was c.995,000 square feet, an increase of 130%. This is before Covid-19 hit and the heightened demand (see below).
- 3.12 A forecast from Forrester suggests that by 2024, an additional 37.2m sq ft of warehouse space is required across the UK, to meet the demands of online retail sector alone.

Impact of Covid-19

- 3.13 Whilst Covid-19 resulted in significant economic shocks worldwide, the I&L sector is one of the few industries which have grown in strength. It is also set to undergo unprecedented growth in response to technological innovation, changing consumer habits, responses to geopolitical events such as Brexit and to the recent pandemic, which has effectively accelerated pre-existing growth trends such as online shopping and stock piling.

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<sup>2</sup> Office of National Statistics 2020

- 3.14 Covid-19 and Brexit combined are leading many companies to decide to bring back production and the stockpiling of goods to the UK to safeguard against future supply chain shocks. In parallel to the rise in online shopping, consumers' expectations for same-day or next day delivery are reshaping operating models for logistics companies<sup>3</sup>. This is expected to increase demand for logistics space away from historic brick-and-mortar shops as reduced delivery times are expected to benefit online retailers.
- 3.15 Analysing the impacts of the Covid-19 pandemic, recent research by Knight Frank estimates that every additional £1bn of online sales leads to a demand for 1.36m sq ft of logistics space.<sup>4</sup>
- 3.16 Whilst future I&L demand is expected to be higher than historic trends, future growth is being constrained by the lack of available floorspace and land supply. This is particularly acute along the M4 Corridor and this is explored further in Section 6.

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<sup>3</sup> McKinsey & Company (2014), Same-day delivery: The next evolutionary step in parcel logistics

<sup>4</sup> Knight Frank (2020) How will rising online sales volumes impact on demand for distribution and logistics space? Online article: <https://www.knightfrank.co.uk/research/london-report/2020-10-07-how-will-rising-online-sales-volumes-impact-on-demand-for-distribution-and-logistics-space>

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## 4 Emerging Spatial Strategy

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- 4.1. Although the LPR is relatively well advanced, with adoption currently targeted for Q2 2023, it is considered the ESS document is still relatively high-level.

### Plan Period

- 4.2. It is acknowledged the LPR is set for adoption in Q2 2023. This would therefore fail to accord with the NPPF's requirement for a minimum 15 year plan period from adoption (paragraph 22), with the plan period running on 13 years from the date of adoption. The Council must resolve this before progressing to the next stage of the LPR. We would suggest incorporating sufficient flexibility to allow for any potential slippages in the plan making process.
- 4.3. In addition, the base date of 2016 is already 5 years out of date, and will be seven years on adoption. The plan should be rebased to 2020, with an updated evidence base. This is explored further in the following section.

### M4 Junction 17

- 4.4. The ESS identifies Junction 17 of the M4 as an area of established employment land, and potentially an area for employment growth, delivering a scale and form of economic development that is not appropriate to be met at the main settlements within the County. This is supported and assessed in further detail below.

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## 5 Levels of Employment Growth for Wiltshire

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### Out of Date Evidence Base

- 6.1 As part of the LPR evidence base, Wiltshire Council undertook an Employment Land Review (ELR) to assess future demand and supply of B use class employment land in Wiltshire. The ELR was published back in April 2018, almost three years ago, and on adoption in Q2 2023, the evidence base would be over five years old. The proposed employment land requirements which the LPR is based upon would not have captured the historic growth witnessed in the I&L sector, the recent boom from Covid-19 or the forecasted unprecedented growth in response to technological innovation, permanent changes to consumer behaviour and stock piling outlined in Section 3.
- 6.1 Furthermore, the ELR recognises data gathering on the demand for and especially the supply of employment land should be an ongoing process. The report itself acknowledges it *'only provides a snapshot of supply at the moment'*. As a result, it recommends Wiltshire Council regularly reviews the document, updating the supply assessment on an annual basis and updating the demand assessment at least once every five years (emphasis added). Despite these recommendations, there is no mention in the ESS that any further updates to the ELR have taken place, and the document still refers to the defunct Swindon and Wiltshire Spatial Framework Plan dated 2016/17.
- 6.1 The evidence base is therefore already considered out-of-date and not consistent with national policy, failing to meet paragraph 31 of the NPPF. The ELR does not form an up-to-date evidence base upon which to consider the soundness of the emerging employment land demand figures. **It is therefore recommended that the ELR should be reviewed before the LPR progresses to the next stage.**

### Employment Land Requirements

- 6.1 The ELR acknowledges that overall there is a shortage of readily developable employment sites in areas of strong demand, which is a constraining factor on economic development. Furthermore, it identifies an immediate need for new allocations in the Wiltshire part of the M4/Swindon FEMA, with a forecast undersupply of around 4ha of employment land and 8ha over the full local plan period.
- 6.1 Notwithstanding identifying a shortfall in development sites, the LPR disregards the ELR conclusions, concluding it is not necessary to allocate further employment sites to meet the forecast demand in Wiltshire. The ESS considers the Core Strategy identified and allocated a significant supply of land for employment need, with supply far exceeding forecast need. Looking forward, the Council considers the evidence base of forecast rates of take up and demand shows the industry and office uses generally continue to meet anticipated needs. However, as outlined above, this assessment has been based on an out-of-date evidence base, which has not taken into account the significant growth in I&L sector since 2019, after the ELR was published.
- 6.1 This approach is not considered to be in the principle of sustainable development, as it is not sufficiently flexible to adapt to change, and is therefore considered contrary to paragraph 11 of the NPPF.

*Housing-led*

- 6.1 The Council's employment requirements are reliant on needs arising from housing numbers and there is a discrepancy between how the housing need and employment need is calculated. The ESS acknowledges Chippenham is set to have by far the largest additional housing need over the plan period. However, whilst the housing need projects forward to take into account future growth, the employment need is focused on historic supply (based on a historic evidence base) and doesn't acknowledge employment need increasing independently (from events such as Covid-19, rise of e-commerce, Brexit etc.). The ESS acknowledges there may be a need to revise the housing numbers in line with government's revised methodology, yet fails to recognise the employment demand may be tweaked too.
- 6.1 If the ESS does not intend to secure formal allocations to accommodate future growth, a policy should be formed which is sufficiently evolved to provide the market with confidence to pursue applications where demand for logistics uses exist. This is explored further in Section 9.

Savills Research

- 6.1 Savills Economics have calculated that Swindon and Wiltshire require significant additional allocated industrial land to meet the anticipated spaced demands for future job growth. Using Oxford Economics employment forecasts for Swindon and Wiltshire to 2030, it has been calculated that there will be an additional 2,988 employees working in B Class industries across Swindon and Wiltshire. This equates to an additional 1.99 million sq ft of warehouse space will be required by 2030.

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## 6 Potential locations for development

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- 6.1 At a national level, planning policy identifies that the logistics sector has distinct locational requirements<sup>5</sup>, and planning policies should recognise and address the specific location requirements of different sectors, including storage and distribution operations of varying scales and in suitably accessible locations (paragraph 82 of NPPF). However, this focus hasn't been carried through at a local level in the emerging LPR.
- 6.2 The LPR rightly adopts a settlement hierarchy which focuses housing development at the largest settlements. This is appropriate for that sector, in line with the principles of sustainable development, however some elements of the employment sector have requirements that mean they should not be constrained to particular settlements or market areas. This approach neglects wider opportunities, particularly regional/nationally significant employment opportunities which are not appropriate to site directly adjacent to those settlements because of their scale and the impact they would have on the local road network.
- 6.3 The sustainability appraisal considered requirements for an additional 9ha of employment land in Chippenham HMA. As shown in Appendix 2, when considering future employment development sites, this was limited to those surrounding the existing Chippenham settlement. This approach for reviewing and identifying sites is not in accordance with paragraph 81 of the NPPF as the approach and quota for development is not flexible enough to accommodate further growth outside of this HMA or recognising and addressing specific locational requirements as per paragraph 82 of the NPPF.
- 6.4 The ELR identifies a severe shortage of supply of big sheds along the western M4, and acknowledges a market opportunity for Wiltshire, with *“the central position of which would give any big shed development, for example on sites with good motorway access at M4 Junction 17, an advantage with its access to both London, the West and Wales.”* Whilst the ELR acknowledged the locational requirement and opportunity, the Council has failed to acknowledge it by considering and accommodating those demands arising outside of the needs of HMAs.

### M4 Corridor

- 6.5 Through the PPG the government recognises that the logistics industry is “critical” in enabling an efficient and sustainable supply of goods which serves national or regional markets. The LPR fails to look at regional or national market demand for B8 logistics and distribution uses, or demand further along the M4 corridor.
- 6.6 Savills' evidence of the logistics market highlights a particular lack of supply along the M4 corridor which is preventing larger regional/national/international businesses setting up new centres for distribution<sup>6</sup> as part of the growth and re-shaping of the logistics industry within the UK.
- 6.7 Nationwide take-up trends for logistics floorspace have been mirrored along the M4 corridor. Savills' research has found that the supply of warehousing space is particularly limited along the M4 corridor. The market 'rule of thumb' is that a market is under supplied which it has less than two years of supply in the market. Savills' research evidence suggests that prior to the Covid-19 pandemic, the warehousing market along the 'M4

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<sup>5</sup> PPG paragraph 031, Reference ID: 2a-031-20190722

<sup>6</sup> Savills Research: The Growth of UK Logistics and an overview of the M4 corridor market

corridor' was already chronically undersupplied with just 0.56 years of supply in 2019<sup>7</sup>. In addition, research from January 2021 shows there is just 1.24 years' worth of supply in the wider south west market<sup>8</sup>, demonstrating a further undersupply.

- 6.8 Furthermore, the share of all online retail sales is expected to normalise at around 24% in the UK, well-above the pre-Covid trend, and then will continue to grow. This demonstrates that the logistics and distribution sector is experiencing rapid growth, and the market along the M4 corridor is mirroring existing trends.
- 6.9 The LPR fails to acknowledge its unique location on M4 corridor which will attract various regional/national/international occupiers and provide significant employment opportunities. In order to respond to this increasing demand and maximise economic growth, the LPR needs to provide further policy support for the I&L sector, as set out in Section 9.
- 6.10 In the absence of an up-to-date assessment of regional or national market demand for logistics and distribution uses in the ELR, the Wiltshire LPR is not considered to be 'justified', 'positively prepared' as required by national planning policy.

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<sup>7</sup> ibid

<sup>8</sup> Savills: Big Shed Briefing: January 2021

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## 7 Policy for consented St. Modwen Park, Chippenham

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- 7.1 It is unclear from the evidence base presented what the Council's specific approach will be for the permitted site at St. Modwen Park Chippenham or employment development at Junction 17 more widely. However, the ESS does clearly recognise the potential significance of an employment cluster at Junction 17 of the M4, referencing the planning permission granted at the site because the proposal was determined to be *'essential to the wider strategic interest of the economic development of Wiltshire'* (para 3.47).
- 7.2 While the site's development is now well advanced, with the access and first unit already delivered, and ground remodelling and drainage undertaken for the wider site, it is considered necessary and appropriate that the site is the subject of a Local Plan policy that safeguards its status as a strategic employment site.
- 7.3 The site was brought forward to meet the needs of logistics operators of a regional, national or international significance, with proximity to the motorway network critical to the viability of their operations and also limiting the need for HGV traffic on the local road network. The nature of the development proposal is therefore distinctly different, both in terms of the operators and the scale of the buildings, from the nature of the employment allocations sited at/adjacent to Wiltshire's key settlements (as recognised at para 3.47 of the ESS). This difference is acknowledged, and suggests that a bespoke policy for the site may be appropriate.
- 7.4 It is understood that the Council proposes to provide a comprehensive draft of the emerging Local Plan in the latter part of 2021, and draft policies will be available for consultation at that stage. Given the significance of this employment site to Wiltshire, we anticipate that a bespoke policy for the site will be included at that stage, potentially as an evolution to/variant of the current Core Policy 35.

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## 8 Site B Submission – Land to the north of St Modwen Park Chippenham

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### Site Context

- 8.1 Site B extends approximately 7.2ha and comprises land to the north of the B4122, to the south-east of Junction 17 of M4. The M4 Motorway runs along its northern boundary and St Modwen Park Chippenham (Site A) lies immediately to the south. The extent of Site B is outlined in **Appendix 1**.
- 8.2 As confirmed by Wiltshire adopted Policies Map, the site is not subject to any environmental or landscape designations which could preclude development. It does not contain any vegetation as confirmed through extended ecological surveys.
- 8.3 The relevant technical surveys and reports (archaeology, land contamination etc.) have been undertaken of the site as part of the Site A outline planning application (ref: 17/03417/OUT). This technical base could support an application.
- 8.4 Landscaping along the southern boundary of the site was included within the Site A outline consent.
- 8.5 The principle of development has been explored through pre-application discussions with the Development Management Team.

### Support for Location

- 8.6 The grant of consent for Site A (ref: 17/03417/OUT) has established the principle of a major employment development at Junction 17 of the M4. This makes Site B an appropriate focus for further growth.
- 8.7 Junction 17 provides the opportunity for logistics operations to serve a significant area because of the transport connections it affords, particularly having regard to drive times.
- 8.8 The Swindon and Wiltshire LEP have actively supported the principle of a strategic employment development at Junction 17 through the outline planning application for Site A, and this is set out in the officer's Committee Report. The ESS also acknowledges J17 M4 as a location which has witnessed employment growth.
- 8.9 In the conclusions of the ELR at paragraph 7.4, the consultants confirm the potential for Site B as part of an opportunity to develop 80 ha of employment land at Junction 17 to *“satisfy regionally or nationally significant requirements”* and recommends that *“A set of criteria should be developed, against which development proposals for these sites should be considered, based on section 7.2.2, above. Principles for the development of these sites should be that they support development that cannot be located anywhere else in Wiltshire; that they make a significant contribution to the local economy through employment and/or supply chain relationships; and that they do not compete with or adversely impact on the deliverability of other employment sites in Wiltshire”*.

## Highways

- 8.10 The site benefits from a key strategic location on the M4 corridor which stretches from London, via Reading through to Bristol and Wales.
- 8.11 Section 3.37 of the ESS acknowledges a focus on development in Chippenham provides opportunities to make best use of existing infrastructure, including local transport networks. The transport connectivity of Junction 17 and Site A was illustrated through the outline consent for Site A and its associated Section 106 contributions. A Travel Plan Framework incorporated the provision of a local bus service with a route established to Chippenham. Whilst located outside the immediate area of Chippenham, this Framework established an approach to ensure employees could easily access work.
- 8.12 In terms of accessibility and sustainability of a motorway junction, research by Stantec has found that the increased use of fuel and time cost apportioned to the HGV driver can increase costs by 1,735% when comparing a site adjacent to a motorway junction to a site c.10km away. This is important to note with regard to the Council's objectives set out under the document titled 'Addressing Climate Change and Biodiversity Net Gain'.
- 8.13 Highways England are in the process of undertaking highways works to enhance J17 of M4. It is worth noting vehicular access has already been established via a new roundabout off the B4122.

## Local Employment

- 8.14 It is acknowledged in the ELR that Wiltshire has historically high levels of out-commuting, particularly with higher skilled workforce travelling to the adjoining areas of Swindon and Bath & North East Somerset. Section 3.37 of the ESS goes on to state '*potential pressure on transport can be mitigated by local employment and by less need to travel elsewhere*'. Based on the 2011 ONS Data, the number of people travelling from Chippenham to a place of work on a daily basis equates to 18,548, with only 2,859 of these working within the town. **Appendix 3** confirms the commuting patterns for the residents of Chippenham and illustrates the significant distances residents of Chippenham are having to travel for work<sup>9</sup>. By providing employment at the established Junction 17 logistics hub, with bus routes already established, it can provide local employment and help to reduce levels of out-commuting.
- 8.15 A Local Labour Agreement (LLA) was formed as part of the outline consent for Site A. This secured the labour market to be confined to Wiltshire to prevent the leakage of jobs to surrounding authorities and help address out-commuting. It is understood this was the first LLA within Wiltshire and has helped establish a route for further development on that location of that scale and nature. In addition, the LLA established educational links with Wiltshire College by committing to appointing apprentices and trainees. It is anticipated a LLA for Site B would help to reduce out-commuting further.
- 8.16 As the I&L sector becomes more technologically advanced, it is expected to increasingly require high-skilled workers such as data scientists and engineers, managers. It is convenient for these people to be closer to the operations they control and analyse. The nature of these jobs serve as an alternative to the existing employment provision in Chippenham. Furthermore, it is estimated that 6.4million jobs are at risk of being

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<sup>9</sup> Data Shine Commute, 2011 ONS Data

lost due to Covid-19<sup>10</sup>. The increasing diversity of I&L jobs and its predicted growth mean that it can absorb some of the job losses from vulnerable sectors.

### Employment Land Review

- 8.17 The ELR specifically comments upon J17 M4, and Site B, confirming that the site (together with a small number of other sites; including Site A) *“could accommodate high value inward investment that would not otherwise come to Wiltshire”* for example *“high value, exceptional economic activities that cannot locate anywhere else in Wiltshire e.g. because of the site size requirement or building floorplate requirement that cannot be met elsewhere in Wiltshire”*. It is suggested that Wiltshire Council *“extend Local Plan Core Policy 34 to cover the sites at Junction 17, where any proposal brings significant additional contribution to the value of the Wiltshire economy, that cannot be accommodated on any other sites in the county”*.

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<sup>10</sup> McKinsey & Company (2020) COVID-19 in the United Kingdom: Assessing jobs at risk and the impact on people and places. Online Article: <https://www.mckinsey.com/industries/public-and-social-sector/our-insights/covid-19-in-the-united-kingdom-assessing-jobs-at-risk-and-the-impact-on-people-and-places#>

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## 9 How to secure the opportunity at Site B in the plan

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- 9.1. As was evidenced through the grant of the application for St. Modwen Park, Chippenham, not all strategic employment needs are appropriate to be located at the main settlements. Major logistics operations now demand both close proximity to the UK's motorway network, and suitable buildings at a scale that typically cannot be accommodated at sites close to residential areas. Given the significant growth in the logistics industry, strengthened by the increase in online retail established during the pandemic, St. Modwen Developments Ltd & Messrs Sealy consider that the emerging Local Plan must include a strategy for responding to this need.
- 9.2. The documents supporting the emerging Local Plan do not give certainty to how the Council proposes to respond to the need (or potential need during the plan period) for further strategic employment sites away from the main settlements. It is clear from the ESS (as referenced above) that the opportunity at Junction 17 to meet the needs of regional, national and international logistics operators is distinctly separate from the local needs arising at the main settlements within the County. The question therefore arises, how best to provide within the emerging Local Plan for the opportunity that exists.

### Options for delivering strategic employment land for strategic logistics employment use

- 9.3. There are a number of approaches that may be considered appropriate:
- **Allocation** of specific sites to enable the market to bring forward major logistics development with certainty that the principle of development is acceptable at that location.
  - **Reserved sites** that major logistics development are directed towards where the need for the development is proven at the time of the application.
  - **Development management policy** that allows for sites to be brought forward where the site itself and the development proposal meet specific criteria at the time of the application (as per Core Policy CP34 within the existing Wiltshire Local Plan).
- 9.4. To rely solely on a development management policy in the form of CP34 attaches a significant financial risk to any development being brought forward as there is a necessity to fund a significant evidence base without any certainty regarding the acceptability of the location in principle, the specific site or the detail of the development. Essentially that risk represents a bar to developers/end users coming to, or expanding within, Wiltshire. So while there is merit in having a policy which enables economic development to occur which could not have been perceived at the time a Local Plan was adopted, this is considered to be an appropriate fall-back for previously unidentified economic opportunities rather than an approach that appropriately addresses already identified economic needs.
- 9.5. Reserved sites are useful where the need for sites to be available may arise during the course of the plan period, but has not been established at the time when the emerging Local Plan is being established. This effectively directs developers/end users to particular sites. In respect of strategic economic development sites

for logistics, this would provide a high degree of confidence that the location is acceptable in principle, but there would still need to be an evidence base established which proved the need for the release of the site to meet economic demand and support economic growth. The cost in both time and funding to progress such an application would be a risk factor that end users would need to consider when determining whether to advance a proposal for that site.

- 9.6 An allocation is appropriate where the demand for additional development during the plan period is known and is not being met by existing land supply, and appropriate sites are being promoted to meet that need. This removes the significant risks associated with securing the principle of development that arise from reliance on a development management policy or a reserved site status, and allows a developer or occupier to progress an application with confidence that their focus needs only be on the detail of the proposals.
- 9.7 St. Modwen Developments Ltd & Messrs Sealy have concluded that a combination of the above approaches are appropriate for the emerging Local Plan, with allocations where appropriate and an underlying policy which enables the Council to bring forward further economic development, if necessary.

#### Proposals for emerging Wiltshire Local Plan – northern plot at St. Modwen Park, Chippenham

- 9.8 In respect of the northern plot at St. Modwen Park, Chippenham (referred to as Site B), it is considered appropriate to allocate the site to meet the needs of strategic logistics operators during the plan period for the following reasons:
- The existing and anticipated demand for further logistics development along the M4 corridor which should be met during the plan period;
  - The need for developers/occupiers to have a degree of certainty when investing in the promotion of a planning application;
  - The appropriateness of Junction 17 as a location to meet that need (as established through the consent granted at St. Modwen Park Chippenham);
  - The fact that the consented site is well advanced and is likely to be fully occupied in the early stages of the emerging Local Plan, meaning that there is no proposed provision within the plan to meet that further need;
  - Travel Plan arrangements already secured for the permitted site ensure appropriate access for the local workforce to St. Modwen Park Chippenham which the northern plot will benefit from;
  - The contained nature of the site, bounded by highway infrastructure and development on all sides; and,
  - The presence of an implemented roundabout serving the site ensures appropriate access already exists.
- 9.9 The ESS indicates that the precise approach to any further strategic employment development at Junction 17 may require *‘a more comprehensive treatment of the area’* *‘to ensure its role is defined distinct from settlements that might otherwise be undermined and to consider what infrastructure or other uses can help to support sustainable development objectives’* (para 3.47). St. Modwen Developments Ltd & Messrs Sealey are

supportive of a distinct allocation/policy approach to reflect the opportunity and to ensure it is distinct from the employment land offer available at the County's main settlements.

Proposals for emerging Wiltshire Local Plan – general policy for additional/unallocated employment land

- 9.10 In terms of a policy to deal with any additional employment land proposals, an evolution of Core Policy 34 would be appropriate. However, there were clear difficulties with the current wording of the policy in dealing with logistics development that aims to meet the needs of regional/national/international business operations which were identified during the promotion of St. Modwen Park Chippenham. Specifically, Part iv) of the current policy focuses solely on economic development that is *'considered essential to the wider strategic interest of the economic development of Wiltshire, as determined by the Council'* and the subsection of the policy requires development to be *'supported by evidence that they are required to benefit the local economic and social needs'*. These tests are too inward looking, focusing only on the benefits that a development will bring to Wiltshire. While the benefits to Wiltshire will be material to an assessment of a planning application, the policy should also enable the assessment to acknowledge the wider benefits of economic development that is of a regional, national or international significance, for the greater good of the UK economy.
- 9.11 This would provide greater flexibility in line with the Council's proposed approach to economic development set out within the ESS which states that *'A focus of the planning framework is to support economic recovery from the impacts of COVID-19. Planning controls will therefore need to be less prescriptive and be more flexible in the face of current additional uncertainty'* (para 3.20).

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## 10 Conclusion

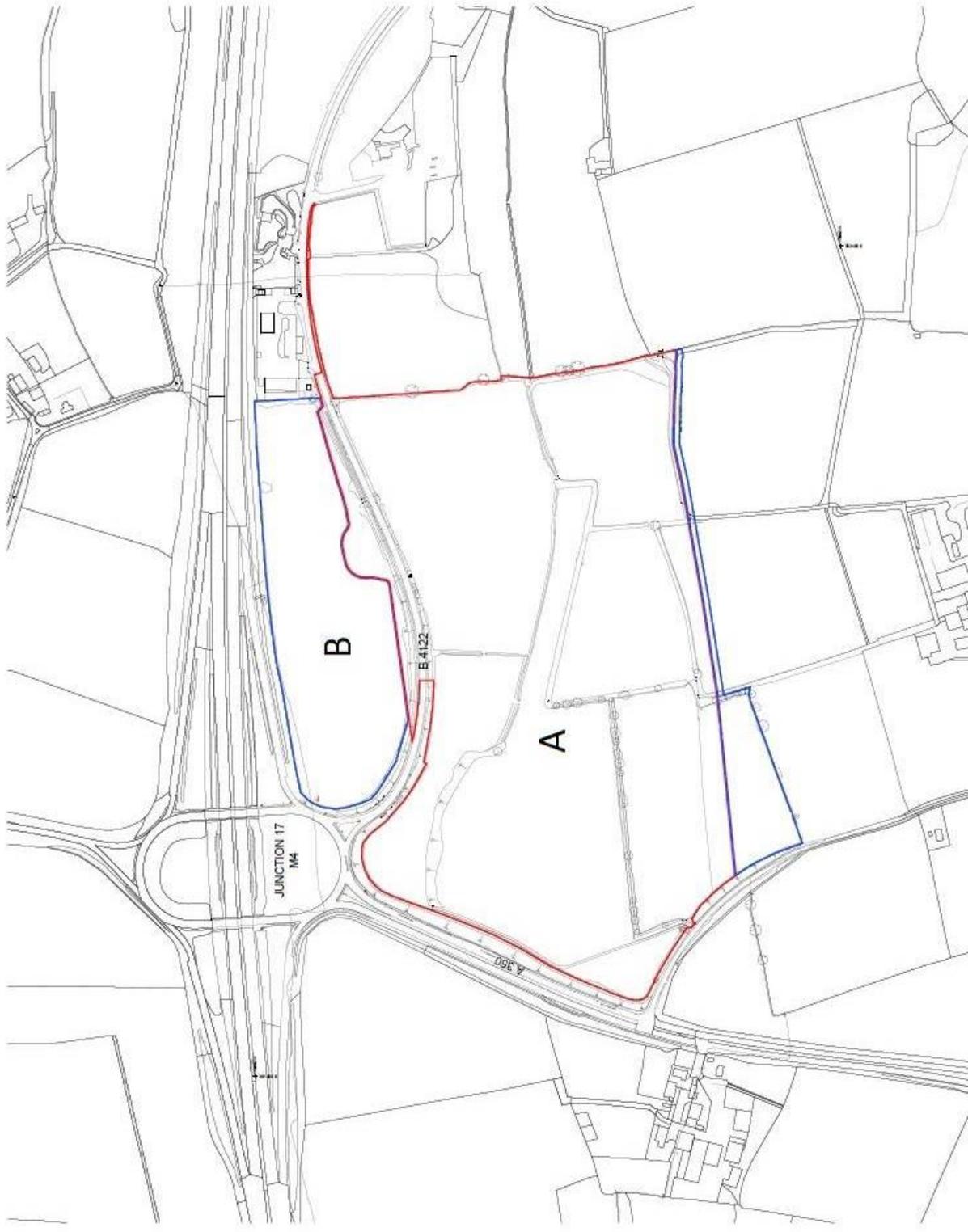
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- 10.1 Overall, St. Modwen Developments Ltd & Messrs Sealy currently have concerns regarding WC's evidence base underpinning the LPR and the resultant approach to economic need.
- 10.2 The government recognises that the logistics industry is "*critical*" in enabling an efficient and sustainable supply of goods which serves national or regional markets. This was recognised before Covid-19 hit, with demand for online shopping, next day delivery and increased stock piling from Brexit heightening demand further.
- 10.3 It is our clients' view that the economic evidence underpinning the LPR fails to sufficiently account for regional and national economic needs, notably in relation to the chronic shortfall of B8 logistics and distribution uses along the M4 corridor and the significant anticipated growth that needs to be accounted for. This is partly as a consequence of the evidence base being out of date with the plan, upon adoption, being seven years post-base date. The evidence base needs updating to fully identify the additional demand for employment land.
- 10.4 A combination of the approaches outlined in Section 9 is required for delivering strategic employment land for strategic logistics employment use.
- 10.5 Our clients control approximately 34.43ha of land to the south-east of J.17 of M4, which the Council has already identified as an appropriate location for strategic logistics development. Site A is an established logistics hub, secured against the tests within Core Policy 34. Site B is available for development. The merits of the site as an appropriate location for a strategic logistics hub are established within the outline consent for Site A, as well as within these representations, but key matters to weigh in the planning balance are set out below.
- 10.6 The site benefits from excellent highways connections, located on the only motorway junction making it highly convenient for logistics movements.
- 10.7 The site is generally flat, at low risk of flooding, with no environmental or landscape designations. It is surrounded by commercial built form which makes it suitable for further employment development. The site is considered suitable, available, achievable and developable.
- 10.8 The physical and locational advantages of this site, coupled with an identified and urgent need for new strategic logistics (B8) sites along the M4 corridor, along with the established St. Modwen Park Chippeham site, are considered to justify the allocation of the site for a new logistics hub within the emerging plan.
- 10.9 Our clients will engage with Wiltshire Council through the Local Plan process to develop a robust evidence base to demonstrate the allocation of Site B for a strategic logistics development to meet regional/national need and evolve Core Policy 34 as suggested in Section 7 and 9.

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## Appendix 1: Site Location Plan

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**Chrippenham Gateway**  
M4 Junction 17  
Site Location Plan

**NORTH**

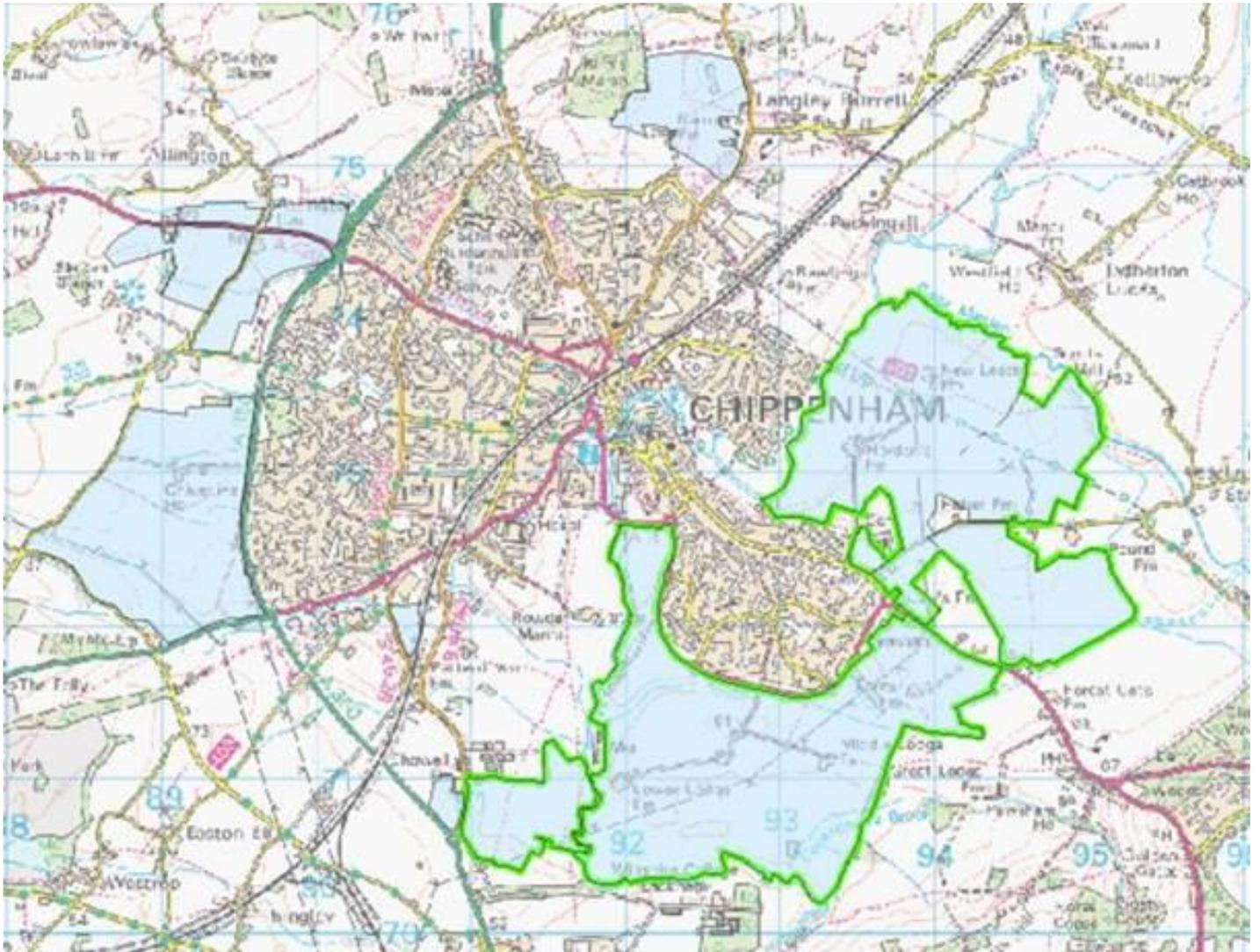
Scale: 1:2500 @A1  
Date: July 2016  
Author: AGL  
Reviewer: JU

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## **Appendix 2: Map from Planning for Chippenham Report**

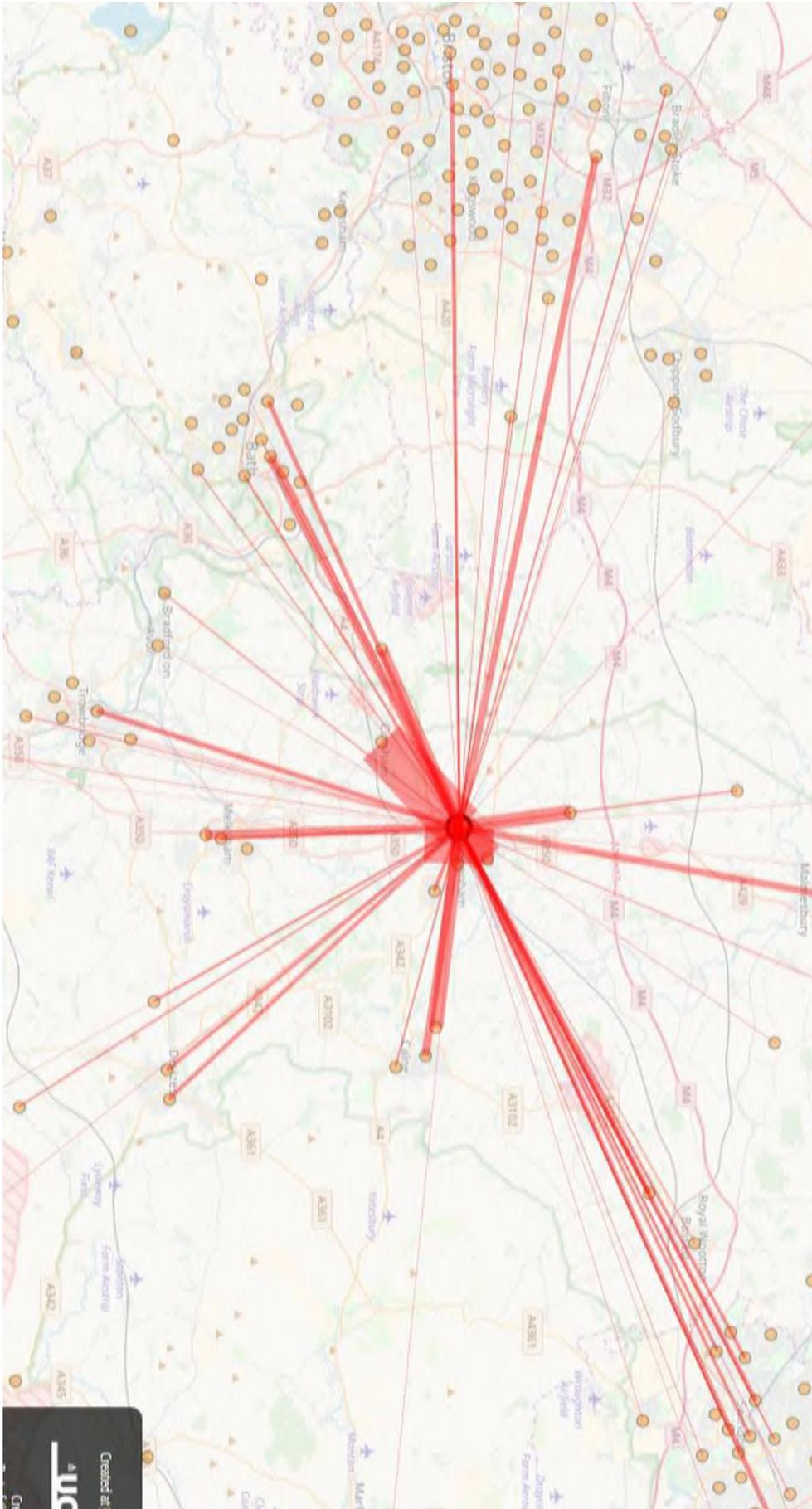
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## **Appendix 3: Map demonstrating people commuting from Chippenham**

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**STRAT361**



**Wiltshire Climate Alliance**

**Response to the Wiltshire Local Plan Review (2016 - 2036)  
Consultation**

**9<sup>th</sup> March 2021**

## Contents

	Page
About the Wiltshire Climate Alliance	1
1. <a href="#">Introduction</a>	2
2. <a href="#">Emerging Spatial Strategy</a>	4
3. <a href="#">Sustainability Appraisal</a>	9
4. <a href="#">Addressing Climate Change and Biodiversity Net Gain</a>	12
5. <a href="#">Transport Review</a>	30
6. <a href="#">Flood Risk</a>	40
7. <a href="#">Climate Report Card</a>	43
8. <a href="#">Access and Inclusion</a>	67
9. <a href="#">Overall Conclusions and Recommendations</a>	70

### **About the Wiltshire Climate Alliance**

Wiltshire Climate Alliance (WCA) is an umbrella organisation for different groups to come together to campaign for action on climate change. WCA consists of a wide variety of groups and individuals whose common characteristic is that they care about the challenges of climate change and the impact of human activity on the environment. WCA has been engaging with Wiltshire Council as a critical friend in relation to the implementation of its Climate Emergency declaration in which it seeks to make the county of Wiltshire (excluding Swindon Borough) carbon neutral by 2030. WCA regards the Local Plan will have a key role in achieving this.

# 1. INTRODUCTION

Following the [Special report on the impacts of global warming of 1.5 °C](#) issued by the Intergovernmental Panel on Climate Change (IPCC) in October 2018, the urgency of the climate crisis has been brought into sharp focus, with public protests, school strikes and councils declaring climate emergencies across the UK. The UK Committee on Climate Change reassessed their recommendations and the Government committed to net zero by 2050 and a 68% reduction in emissions (on a 1990 baseline) by 2030. [Wiltshire Council also declared a climate emergency](#) in February 2019 and committed to seeking to make the county (less the Borough of Swindon) carbon neutral by 2030.

Two and a half years since the IPCC report and over 2 years since Wiltshire Council acknowledged the emergency, relatively little has been done outside of the Council's own organisational/ operational boundary, as reported in our [Second Anniversary of the Climate Emergency](#) report. In the report we pointed out that "achieving the radical greenhouse gas emissions reductions required to meet net zero in 2030, or even the 68% reduction in the [6th Carbon Budget](#), will require all the plans developed by the Council to work in an integrated way. In particular, the Local Plan, the Local Transport Plan and the future Climate Change Strategy/ Carbon Reduction Plan." We had particular concerns over the lack of any formalised baseline of current emissions that the carbon budget that Wiltshire can work within, and any targets or milestones by which progress and success can be measured and scrutinized. We also expressed concern about the lack of a joined-up approach, for example:

- continuing to apply for grants for road building at scale but only investing in active travel when government grants or developer contributions allow; or
- continuing to build houses that do not meet net zero carbon standards through its Stone Circle housing company;
- or proposing housing developments on its own farms that are important carbon sinks, vital for future food supply and which could be used to generate renewable energy.

Many of the concerns expressed relate to spatial and transport planning, which is one Wiltshire Council's biggest risks but also one of its biggest opportunities to influence carbon emissions and channel investment into greenhouse gas reduction.

We are informed by the National Planning Policy Framework (NPPF) that there is a presumption in favour of sustainable development but it is worth reminding ourselves what the definition of sustainable development actually is, namely 'Development that meets the needs of the present without compromising the ability of future generations to meet their own needs' (World Commission on Environment and Development, 1987).

The NPPF itself reiterates that economic, social and environmental objectives need to be pursued in mutually supportive ways, including protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy. Yet past local plans have repeatedly traded the environment against aspirations for economic growth that have often failed to materialise and come with severe consequences for our wellbeing and that of future generations, reflected by the climate and ecological emergency we are all now facing. This needs to change.

In our response to this consultation, we have been guided by many sources of information, including from organisations such as the Royal Town Planning Institute, the Town and Country Planning Association, the UK Green Building Council, the Centre for Sustainable Energy and Client Earth, in particular its [letter of 2<sup>nd</sup> September 2019](#) to Wiltshire Council's

Cabinet Member for Spatial Planning, in which it highlighted the Council's key legal and policy responsibilities for reducing carbon under the Local Plan. It laid out how it could meet these by:

- Setting a local carbon target framework based on a comprehensive assessment of carbon reduction potential in relation to carbon reduction targets;
- Demonstrating proposed planning policies' consistency with this local target framework; and
- monitoring performance on at least an annual basis using relevant indicators.

Like Client Earth, we think this is a sensible way of proceeding. Therefore, in addition to commenting on various section of the Local Plan proposals and answering consultation questions, we have included a Climate Report Card, based on the Client Earth recommendations, which we intend to develop further and use to assess the Local Plan proposals, including this and the radically revised version of the Plan we hope will follow.

## 2. EMERGING SPATIAL STRATEGY

Any form of development will have significant amounts of embodied carbon, as well as carbon emissions resulting from its construction, in addition to the operational emissions during the lifetime of the development, if not constructed to zero carbon standards.

Development that has limited local employment (as is the case for Wiltshire) and creates greater car dependency will also lead to substantial additional carbon emissions. This is even more so if that development is focused on greenfield sites rather than brownfield.

Therefore, even the planning for a minimum number of houses needed to avoid speculative development being granted permission by the Secretary of State, will generate substantial quantities of emissions and the Spatial Strategy should focus on allocating the minimum number.

At 45,630, the proposed housing target for Wiltshire is far too high and is 5,000 higher than even the out-dated “standard method” prescribes. At 40,840, the “standard method” projections (including the imputed 36% uplift that increases it from 29,940 to 40,840) is also too high, as it is based on Office for National Statistics (ONS) housing demand projections for 2014, when the national population was growing much faster than it currently is or is predicted to, rather than more recent 2018 or 2016 projections, which would result in a 24% lower baseline figure of 22,750 houses.

In addition to this the birth rate in the UK has declined and the impact of leaving the EU has reduced immigration, leading to an increasing risk of over-supply, as has happened in countries such as Japan and Spain, when their populations declined<sup>1</sup>.

In attempting to justify selecting the significantly (12%) higher number of houses over the lower one, the spatial strategy asserts that ‘there are no adverse effects of such significance that would prevent the higher figure being progressed.’ Whether carbon emission form part of what is considered to be significant (or not) is unclear. The footnote says that mitigation measures would sufficiently reduce any adverse effects, without any evidence to support such a sweeping statement. This begs numerous and fundamental questions about the basis on which an additional 5,000 houses could be judged not to have significant adverse impacts and what mitigation measures could negate those adverse impacts that are believed would result, all of which is simply left hanging (2.24).

For Wiltshire, these inflated housing targets bear little relation to local housing need (i.e. are far in excess and in the wrong locations) and or local employment opportunities, which are severely limited, the net result being in-migration of people who depend on cars to commute back out of the county for their employment (which is unsustainable).

However, they do have significant adverse consequences for climate change and the natural environment, which could be avoided with lower numbers and a more sustainable approach to site selection.

The adverse impacts of the existing proposals include:

- Destruction of agricultural meadows, arable farmland and woodland that currently act as carbon sinks - which would both release vast quantities of greenhouse gases and remove their future carbon sequestration potential;
- Construction of roads, railway, river and canal bridges, and concrete fly-overs (some a long as 0.5km across the River Avon floodplain) - which damage the climate as a result of their vast quantities of embodied carbon, as well as emissions associated with the transport and operations associated with their construction;

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<sup>1</sup> <https://www.independent.co.uk/news/uk/politics/covid-uk-immigrants-job-loss-b1787785.html>

- Locking in vehicle exhaust emissions for years, even decades to come - as a result of proposing development in places where people would depend upon their cars to commute to their place of employment (e.g. two thirds of workers in Chippenham already commute to other towns for employment and none of the allocated employment sites in the existing Plan (2006-26) have been built out);
- Lack of commitment to net zero carbon development policies - which are already possible to achieve and allowable under current legislation, and without which new development will need to be retrofitted and an even greater quantity of renewable energy will need to be generated to offset these avoidable emissions;
- Lack of commitment to designating sites for renewable energy generation, such as council owned farmland and County farms, which would make a significant contribution to carbon reduction and have the added benefit of protecting valuable agricultural land and food supply for the future;
- Lack of commitment to a tree canopy target and to planting trees on Council owned land, which would sequester carbon and contribute significantly towards the UK's and Wiltshire net zero targets;
- Destruction of natural capital, wildlife habitats and existing and future biodiversity - including proposals to build on areas containing endangered species. Much of this natural capital is irreplaceable, the loss of which cannot be mitigated;
- Destruction of high-quality agricultural land - including some of the best and most versatile which we know will be increasingly important in terms of both national food security and local food production. The Local Plan proposals include developing on Council owned land, which could otherwise be used for renewable energy generation (e.g. solar farms) and tree planting, in line with Wiltshire Council's 2030 net zero target. The proposed Plan would also include permanent loss of County farms, set up to provide employment opportunities for the next generation of farmers;
- Exacerbation and undermining of local communities' resilience to climate change impacts – for example by building adjacent to flood plains that are likely in future to extend some of the proposed development zones putting lives and properties at risk.

It is stated in the Spatial Strategy document that “addressing climate change is already a Local Plan objective.” that “a sustainable pattern of development and how growth is distributed appropriately continues to be an important means to help address climate change” and that “carbon reduction is already an integral theme of the Local Plan.” Also that “mitigation is related to dramatically reducing the amount of carbon released in Wiltshire,” which is “largely related to emissions from cars and the energy used to heat and power homes and businesses. And that the Plan aims to “reduce the need to travel, and travel by the private car in particular, by providing jobs, facilities and services locally.”

The current proposals seem to be in direct contradiction with all these aspirations and set to generate huge positive net emissions, which there seems to have been no attempt to measure, wiping out (many times over) any reductions Wiltshire Council is making in its own operations. If carbon reduction was an integral theme, there would be specific, measurable targets and milestones within the Plan, setting out how the Plan will help get Wiltshire to net zero by 2030. As it is, there seem to be no carbon reduction targets of any kind.

The box entitled ‘Climate change outcomes’ (page 4) claims that focusing development in the County's main settlements would reduce carbon emissions, yet the spatial strategy does not explain how this reduction would be achieved. Neither is there any evidence of how these ‘aspirations’ have actually influenced the strategy or connects with what is being proposed. Taking Chippenham as an example, making use of existing infrastructure (a

claimed carbon reduction measure) is not part of the strategy. In fact, sites that would make use of the A350 and existing national grid and utility services infrastructure have been discounted in favour of massively carbon intensive new infrastructure for sites to the East and South. The need to travel and dependency on cars would be increased given the limited local employment opportunities and lack of employers moving in as a result of the last Plan, and the opportunities for renewable energy constrained by existing and proposed new development (i.e. instead of renewable energy generation on the Council owned land that has been put forward for building on). All of which substantially increases rather than reducing carbon emissions.

The document also speaks of “maximising development that re-uses previously developed land and limits the loss of countryside wherever possible remains a priority,” yet excludes brownfield development from the target numbers and says almost nothing about how reusing previously developed land (brownfield sites) for housing would be maximised. A far more proactive approach is needed here rather than putting that burden on local communities and Neighbourhood Plans, who in the main are volunteers with limited time to commit or gather the detailed knowledge required to navigate the complex bureaucracy involved in their creation (2.11, 2.12).

Local employment should be a key element of any sustainable development/ sustainable Local Plan in order to avoid creating isolated and disconnected (with their own communities) commuter towns. The spatial strategy states that ‘There is already a large supply of land available to meet business needs across the County’, indicating that the Council’s approach to allocating employment land is clearly having no impact on addressing this key aspect. This needs to be addressed before bringing in tens of thousands of additional houses with no local employment opportunities. There seems to be no logic in allocating additional land for business use, which also seems to be the same quantity regardless of the number of additional houses (2.18).

If the strategy aims to encourage a change from car travel to more sustainable modes, it needs a focus on concentrating housing and workplace growth in places where no additional roads would be required, where it would be quick and easy for people to access their work and shopping needs on foot, by bicycle or with a short trip on public transport. To propose that the scale and pattern of growth will require more roads, shows that the strategy does not support the modal shift to sustainable transport (3.23).

The assessment of the impact of Covid is welcome, particularly in relation to the future of our town centres, the rise of the home worker, and the need for much better walking and cycling infrastructure to support the re-localisation of work and shopping. However, the Local Plan needs to work symbiotically with the Local Transport Plan to deliver the desired and required walking and cycling infrastructure and this should certainly be prioritised over the building of new roads, which will hamper decarbonisation by creating more polluting journeys in private cars, rather than encouraging modal shift to public transport and the more health beneficial walking and cycling options (2.5 - 2.8).

It is also concerning to see the assertion that a focus of the planning framework is to support economic recovery from the impacts of Covid-19, and that planning controls somehow need to be less prescriptive. This could be a disaster in terms of achieving net zero targets and addressing a far greater crisis than covid. This should be reworked to specify that any flexibility in planning controls must serve the goal of transitioning to a net zero society and economy, and demonstrate how it supports the radical emissions reduction targets that also need to be set out in this strategy (3.20).

The document also cites the Town and Country Planning Association’s and Royal Town Planning Institute’s position on plan making and development management supporting a transition to a low-carbon future, and empowering local communities to “shape places to

help secure radical cuts in greenhouse gas emissions,” whilst the spatial strategy would impose housing (on ‘preferred sites’) that would drive up emissions and completely over-ride local community efforts to cut carbon, including those in Neighbourhood Plans.

The emerging spatial strategy has been informed by an interim sustainability appraisal (SA) but this does not appear to fully consider the most pressing factor in terms of sustainable development - the embodied and operation carbon associated with the various options considered, loss of carbon sinks and the transport emissions that would be locked in as a result of the spatial strategy. This seems to be a fundamental omission that removes any remaining credibility. The SA should be a tool for assessing how the spatial strategy will contribute to the radical carbon emissions reductions that will be required to achieve the national and Wiltshire net zero targets or where these are absolutely unavoidable, how they would be neutralised. Throw away statement such as ‘mitigation measures could sufficiently reduce any likely significant adverse effects of the strategy’ (3.77), (3.94) are no substitute for proper analysis. The SA should be making it clear that there are significant adverse impacts associated with all the options set out in the spatial strategy, and providing evidence of how any unavoidable impacts could be successfully mitigated.

The spatial strategy speaks about helping, ‘deliver the climate change outcomes sought’ (3.71 - 3.73), (3.90) but makes no attempt to define them, merely alluding to a net zero target. The means by which net zero will be achieved needs to be set out in the strategy, which seems not to contain any robust proposals to radically reduce emissions or how this will be effected. The spatial strategy as it stands will actually increase carbon emissions and undermine Wiltshire’s ability to reach the net zero target. Whilst alluding to desirable outcomes such as a shift away from private car use and greater settlement self-containment, the strategy fails to elaborate on such crucial observations or set out how the modal shift and self-containment needed will be realised (3.91).

The spatial strategy has been formulated around high level judgements about long term growth, which has become its key determining factor. However, the appropriateness and reasonableness of those judgements needs to be scrutinised, and the strategy adjusted accordingly, if we are to have any chance of producing a Local Plan that is fit for the future. Much is changing in the world and one of the biggest drivers of that change is the climate and ecological emergency. Mitigating future impacts from global heating and adapting to the adverse changes that are already locked in by the failure to address the issue in a timely fashion, mean that the world now has to embark on a programme of radical emissions reductions. Planning for growth is meaningless unless there is certainty that such planning incorporates the mechanisms to deliver those radical carbon reductions. This is completely missing from the strategy, which urgently needs to be reworked to set out exactly how it would work to achieve the necessary emissions reductions (3.2).

If the spatial strategy is to give proper weight to climate change and the environment, it will need to:

- significantly reduce the excessive (and unnecessary) housing numbers in line with ONS predicted growth statistics, which would immediately reduce the pressure on the environment and allow for much lower emissions, and even the possibility of net zero emissions;
- prioritise urban regeneration and brownfield site development as part of this approach;
- include brownfield development as part of the housing numbers, as oppose to treating it as a windfall and thereby deprioritising regeneration and adding to the greenfield target);
- avoid designating sites where future residents would be dependent on out-commuting long distances for employment;

- develop a properly thought-out employment led, rather than housing led, strategy;
- avoid developing greenfield sites that result in loss of carbon sinks and require substantial carbon intensive infrastructure to develop;
- avoid developing greenfield sites that will be important for future flood alleviation and require expensive Sustainable Urban Drainage schemes to mitigate flood risk;
- deploy ‘net zero carbon development’ and proactive ‘renewable energy generation’ policies as soon as possible (rather than waiting for the Government to require it);
- invest in Council owned farms and County farms for national food security and future local food production;
- invest in Council owned farms and County farms for renewable energy generation and tree planting on the less productive land.

The spatial strategy currently runs counter to all the above.

The document also states the spatial strategy “has its most direct relationships with Neighbourhood Plans for main settlements – since they are the focus for growth,” which is clearly not the case, since Chippenham’s Neighbourhood Plan Steering Group (representing one of the main settlements) has never supported the scale or location of the proposed development and Chippenham Town Council has rejected the Local Plan entirely.

Bradford on Avon Town Council’s response documents that the Local Plan “does not recognise or take appropriate account of our Neighbourhood Plan. It is, at best, a ‘business as usual’ plan, intended simply to mark time to 2036,” Describing it as “not so much a Plan, as an allocation of houses in unsuitable places. It lacks vision for the future of our communities and our county.”

### 3. SUSTAINABILITY APPRAISAL

The Interim Sustainability Appraisal (SA), which is used to justify housing numbers and site selection, is of particular concern, claiming that there are no adverse effects of sufficient significance to prevent the higher housing figures being progressed. It concedes that its “evaluation involves forming a judgement on whether the predicted effects are likely to be significant, and that “the principal technique used to assess the significance of effects is a qualitative assessment.” (ISA methodology paragraph 2.3.5)

The SA ignores alternative HMA strategies, which had they been appraised would have undoubtedly been more sustainable. For Chippenham for example, no mention is made of the fact that preference for CH-B - the maximum housing numbers option – has never been consulted upon and was only approved for further work in the political context of a Cabinet meeting in 2019. Yet it is falsely presented as if it were an evidence based conclusion, excluding proper appraisal of more sustainable alternatives. The need for significant additional infrastructure and the likelihood of more significant adverse impacts resulting is mentioned in passing before finding the ‘maximum housing numbers’ on a site with ‘no existing infrastructure’ option to be the most sustainable!

The SA seeks to further negate any objection to the proposed destruction of the Avon and Marden valley between Calne and Chippenham by describing both towns as “less environmentally constrained” but without any evidence to back up the proposition (and plenty of evidence to the contrary).

It goes on to contradict itself by acknowledging that “the proposed level of growth at Chippenham under all three strategies is significant and considered likely to have significant adverse effects on biodiversity, efficient and effective use of land, water resources, transport and environmental pollution, where mitigation measures are likely to be possible but problematic.” And that “under CH-B (the maximum housing numbers option) where growth levels are significantly higher, there are also likely significant adverse effects on climate change adaptation, heritage assets and landscapes.” In other words, that the proposal being promoted is even more damaging and problematic, yet still remains the ‘preferred option’, for reasons unrelated to sustainability and without evidence to support them, completing the circle in what is clearly a tautological argument (i.e. a logical fallacy in which a premise of the argument contains a direct or indirect assumption that the conclusion is true). The SA even takes this a step further in asserting that this “significant level of growth should be able to support new secondary level schooling provision” as though that were an additional benefit (there is no current shortage) rather than additional cost associated with the high housing target.

Minor changes in these inconsistent and ultimately subjective judgements would completely change the outcome of the SA and therefore justification for the housing numbers and locations being proposed and ‘preferred’.

There is also an insufficient level of granularity in the impact assessments such that it is impossible to understand the reasons the scores given. For example, for SA Objective 1 “Protect and enhance all biodiversity and geological features and avoid irreversible losses,” the reduction of 800 houses in Devizes between CH-A and CH-B takes the assessment from “moderate adverse” to “minor adverse”. However, adding 3,300 houses to the Chippenham settlement does makes no difference at all to that assessment score of “moderate adverse”. There are many examples of this throughout Annexe 1, for each of the SA objectives. Without the proper detail behind such scores, they can only be assumed to be completely subjective.

As a further example, massive Biodiversity (SA1), Land & Soil (SA2), Water (SA3), Air Quality (SA4), Climate (SA5), Heritage (SA7) and Landscape (SA8) issues are glossed over

for Site 1 in Chippenham, summarised as having a minor or moderate adverse effect. The destruction of high quality productive farmland is summarily dismissed in a sentence: "Land/soil: given the significant size of this site, there will be a significant loss of greenfield, agricultural land of medium quality". No indication is given of the weight given to this loss, and it is not mentioned again, so clearly not much. Unsurprisingly there are lots of proposed mitigation measures for Chippenham sites 1 and 2 (the Avon and Marden valley) but none of them refer to the value or loss of productive farm land. Biodiversity fairs little better and there isn't even a proper Biodiversity Assessment for the 'preferred sites' in Chippenham, which are 'judged' as having a 'Moderate Adverse' impact without any baseline evidence (reference comments later in this report on the likely impacts on biodiversity and endangered species for these sites).

Other failings include sweeping and unevidenced statements that are made for a huge settlement areas against a single SA Objective. For example, against SA1 Biodiversity for CH-B in Chippenham the analysis is "Additional to housing development, it is likely that significant additional infrastructure will be needed. As a result, moderate adverse impacts are considered likely against this objective. Adverse effects are likely to be more significant than CH-A and CH-C but mitigation measures are possible." Having said that adverse effects are likely to be more significant than for alternative options, the fate of the Avon and Marden valley is sealed in five words "but mitigation measures are possible." This seems to be more consistent with fitting the analysis to the desired results than any objective evaluation. Even the rounding process seems to favour the desired outcome, which also happens to be the two sites for which a HIF bid was covertly applied for in 2018, but which are the most environmentally valuable and infrastructure dependent of all the sites.

[Guidance](#) on Integrating Climate Change and Biodiversity into Strategic Environmental Assessment (SEA) states that "It is also essential to involve the environmental authorities and targeted stakeholder groups, experts, institutions and the wider public at an early stage, to ensure you capture the most important issues and get agreement for establishing a consistent approach." Yet there is no evidence that this has been done in relation to the Local Plan Review, which has brought forward 'preferred sites' and a set of conclusions before any public consultation whatsoever.

The guidance points out that the key mitigation question should be "How may the climate be affected by implementing the Plan in terms of GHG emissions?" (page 33). Yet far from being a key question the SA/ SEA barely considers the carbon implications of the proposed spatial strategy, either making no mention of these or simply recording that the impact will be significant and ignoring the implications. Consideration of "travel patterns and GHG emissions from transport," "opportunities for carbon sequestration via investment in forestry and biodiversity," "habitat loss and degradation" (all listed in the guidance) seem to have been omitted or referred to as needing more information at later stages, by which time, of course, it will be too late, defeating the object purpose of SA/ SEA.

The lack of weight given to anything that would detract from the high housing numbers and preferred site options is illustrated by the SA's coverage of the loss of productive farmland, a substantial amount of which is classified as the 'best and most versatile' in the country. For the Avon/ Marden valley site to the East of Chippenham it simply records that "given the significant size of this site, there will be a significant loss of greenfield, agricultural land of medium quality." No indication is given of the weight given to this loss and it is not mentioned again, but clearly it is clearly not considered significant given the conclusions that follow in the Spatial Strategy. Even the multitude of proposed mitigation measures for the (mainly Wiltshire Council owned) Chippenham sites don't address the loss of this high quality, productive farm land or value as a public good, or the value of its continued use as

farmland or alternatives uses for renewable energy generation (an urgent requirement with temporary land use) or partial reforestation.

Climate change is the over-riding and most significant challenge we are facing and we are in significant danger of exceeding a global average temperature rise of 1.5C, at which point the medium and longer term impacts on our economy and society will far outweigh any potential benefits social and economic benefits associated with proposed housing expansion in Wiltshire. The Government and Wiltshire Council have both made commitments to net zero emissions, with a national target of 68% by 2030 (net zero by 2050) and a Wiltshire target of net zero by 2030. The carbon emissions associated with the Local Plan need to be carefully appraised in advance and given significant weight in determining the sustainability and of the housing numbers and their locations.

Despite this, the SA barely considers carbon reduction at all, conflating climate change mitigation and adaptation and judging significance on the developers' (?) potential to "promote the development of renewable and low carbon sources of energy" caveated with this being "for appraisal at subsequent, more detailed/ site-specific SA stages," by which time, it's probably too late to change much in any case (i.e. if there turns out not to be potential). The two other scoring criteria related to adaptation, which conflates separate issues and dilutes the (already inadequate) assessment of mitigation risk still further.

The SA gives no consideration to the climate impact of removing carbon sinks – high quality organic soils, trees and vegetation – either in terms of the release of greenhouse gases or the lost potential for future sequestration. Neither is consideration given to the embodied carbon or that involved in construction, particularly relevant in places like Chippenham where houses are proposed in the Avon and Marden valley, requiring distributor roads, bridges, 0.5km long river crossings, can bridges, sustainable urban drainage schemes and more, all of which could be avoided with lower numbers and locations that connect to existing infrastructure. Finally, the transport emissions that would be locked in as a result of building on greenfield sites, promoting dependency on car travel, particularly to places of employment, get no consideration. Had the combined emissions been taken into account and then given appropriate weight, a very different spatial strategy would have resulted.

In this respect we endorse the approach proposed by Client Earth to Wiltshire Council in its letter of 2<sup>nd</sup> September 2019, recommending setting a carbon reduction target for the Local Plan based on a comprehensive assessment of the carbon reduction potential, taking account of national and local carbon reduction targets, in order to demonstrate how the Local Plan is consistent in meeting the requirements of the Climate Change Act.

## 4. ADDRESSING CLIMATE CHANGE AND BIODIVERSITY NET GAIN

The paper points out that “in February 2019 Wiltshire Council acknowledged a climate emergency and agreed to seek to make the county of Wiltshire carbon neutral by 2030” and that “mitigation is related to dramatically reducing the amount of carbon released in Wiltshire,” which is “largely related to emissions from cars and the energy used to heat and power homes and businesses.” It also points to the need to “shape places to help secure radical cuts in greenhouse gas emissions, for example through efficient building design and changes to the way we travel,” and “actively support and help to drive the delivery of renewable and low-carbon energy generation and grid infrastructure.”

This is commendable, in as far as it goes. There are however two key issues with Wiltshire Council’s approach:

1. It misses any proper consideration of climate change and biodiversity in relation housing numbers and potential locations; and
2. It fails to propose a strategy and policies that would deliver what it acknowledges is needed.

With regards the former; the numbers of houses and their locations will determine more than anything else whether or not the Plan is sustainable. Adding 5,000 more houses to an inflated housing target based on an out of date (2014) multiplier, which is now acknowledged to be an over-estimate of population growth, is particularly detrimental for a rural county like Wiltshire, where employment opportunities are limited and employment growth constrained, and the vast proportion of migrants into the county will need to commute long distances. It puts pressure on Wiltshire Council’s planners to find yet more and larger greenfield sites, removing carbon sinks, requiring additional infrastructure and locking in more transport emissions for years to come.

The inflated housing figures also make it harder for Wiltshire Council to meet its 5 year housing land supply (which it is already failing to meet under the current Plan), further undermining Neighbourhood Plans and allowing speculative planning applications to be granted permission, potentially adding further emissions through uncontrolled development.

Simply cutting back on the excessive and ultimately, undeliverable target would immediately result in a reduction in emissions and a greater proportion of development on brownfield sites and those already close to existing infrastructure, and closer to existing centres of population. But a much greater reduction in the housing target would be needed to make the Plan sustainable and compliant with the stated aim of “dramatically reducing the amount of carbon released in Wiltshire.” Housing numbers need to be reduced to a point that allows people to live near where they work, make fewer journeys by car and preserves existing natural capital and carbon sinks. The net result: fewer roads, fewer bridges and floodplain fly-overs, fewer SUDs and flood alleviation measures, shorter grid connections, fewer carbon emissions. More green fields would be left intact for carbon capture and food production, and there would be substantially less transport emissions, currently the biggest source of greenhouse gas emissions in the county.

After reducing unnecessarily high housing targets and locating development more sustainably so as to reduce the need for carbon intensive infrastructure and car dependency, the way to “shape places to help secure radical cuts in greenhouse gas emissions” through “efficient building design and changes to the way we travel” and “actively support and help to drive the delivery of renewable and low-carbon energy generation and grid infrastructure” should be through net zero carbon development policies and policies that promote investment in renewable energy generation. Net zero development entails high energy

efficiency standards, with on-building/ on-site renewable energy generation to cover operational energy consumption during the lifetime of the development, any remaining carbon emissions being offset through a renewable energy generation offset scheme (reference the Wiltshire Council Climate Emergency Task Group Report (Part 2) on planning).

Adopted plans such as the London Plan already have such policies in place and many LPAs are including them in their emerging Local Plans, in anticipation of the inevitable changes to the planning system to bring it in line with the Climate Change Act and national carbon reduction targets (net zero by 2050 and a 68% reduction on a 1990 baseline by 2030). Planning legislation already allows for such policies and the Government has reiterated that the soon to be introduced Future Homes standard on energy efficient buildings will be a floor not a ceiling as far as Council's ambitions to achieve net zero development are concerned. In other words, nothing is preventing LPAs from setting net zero development policies. The excuse that viability wouldn't allow this carries little weight anymore, given that viability needs to be assessed at the site allocation stage and developers will be clear about the costs of developing particular sites at a sufficiently early stage. Given that such policies will eventually be the norm across all LPAs, costs will in any case rapidly reduce as carbon neutral development becomes the norm, as it will have to be.

In order to further reduce emissions and environmental damage, a policy should also be introduced for sustainable construction to ensure embedded emissions and those resulting from transport and operations during construction are minimised, and high sustainability standards achieved.

Both net zero development and sustainable construction policies are already being included in some emerging Neighbourhood Plans, such as Chippenham's, which seem to be further advanced than Wiltshire Council's Local Plan in this respect.

The paper also acknowledges that the Local Plan should "actively support and help to drive the delivery of renewable and low-carbon energy generation" yet in the Spatial Strategy proposes to lay concrete and tarmac over Wiltshire Council's (i.e. publicly owned) farms and County farms, wasting a prime opportunity to achieve this stated objective. Not only would renewable energy generation actually help the Council and Wiltshire's residents, cut carbon (as oppose to increasing emissions as currently proposed) but, being a temporary land use, it would preserve valuable carbon sinks, natural capital and high quality agricultural land, which this Plan has designated for destruction. For example, studies have already been submitted and presented to the Climate Emergency Task Group that demonstrate the viability of ground mounted solar energy generation (solar farms) on the Wiltshire Council farms to the East and South of Chippenham (destined to be sold to developers under the current version of the proposed Plan).

**A1: Land-use policies need to be evidence based, realistic, viable and achievable. Is it reasonable to assume that the Local Plan can deliver outcomes that significantly reverse existing carbon emission trends before 2030?**

Yes, it is reasonable to expect the Local Plan to deliver carbon reduction outcomes in line with the national net zero target, with sustainable housing numbers in the right locations, backed up by policies that require net zero carbon development and sustainable construction and promote investment in renewable energy generation. In fact, it is a requirement of planning legislation and the NPPF that local plans are aligned with the Climate Change Act and the Government's [net zero carbon by 2050](#), and [68% reduction \(on a 1990 emissions baseline\) by 2030](#), national target. This is a clear legal duty under [Section 19 of the 2004 Planning and Compulsory Purchase Act](#), as amended by the 2008 Planning Act, requiring that, taken as whole, Local Plan policy contributes to the mitigation of, and adaptation to,

climate change. In other words, Wiltshire's Local Plan not only has to "deliver outcomes that significantly reverse existing carbon emission trends before 2030" but needs to (as a minimum) align (and demonstrate this alignment) with these national targets.

In doing so, it will need to plan for genuinely sustainable development that is located so as to preserve carbon sinks, avoid climate damaging infrastructure and remove, rather than increase, reliance on commuting and private car dependency. It will also need to introduce net zero carbon development policies, to ensure there are no emissions and potentially negative emissions, associated with all new spatial development, which will have the added benefit of removing the need for costly retrofit in years to come. Wiltshire Council would do well to be guided by the [letter it received from Client Earth](#) in 2019 and the [Climate Emergency Task Group's recommendations](#) endorsed by Wiltshire Council's Environmental Select Committee In January 2021.

There is plenty of evidence for the viability of Local Plan net zero carbon or 'carbon neutral' development policies in other Local Authority plans that have adopted or are in the final stages of adopting such policies, including in reports such as [The Cost of Carbon reduction in New Buildings](#) (CSE, 2018). Moreover, determining the viability of Local Plan policies on strategic sites at an early stage (as set out in the 2018 revisions to the NPPF) will ensure any cost implications are incorporated into early land purchase decisions. Planning Practice Guidance sets out useful sources of evidence such as national data on local greenhouse gas emissions and provides sources of evidence of how future patterns of spatial development can be designed to maximise carbon reduction potential by, for example, reducing the need to travel.

The requirement to deliver genuinely sustainable development through Local Plans will ramp up significantly in coming years and there is already evidence of the need for major infrastructure planning decisions to take account of the UK's legally binding obligations in relation to proposed expansion of airports (Heathrow and Bristol) and more recently England's road network, which has been called into question following the revelation of documents showing the transport secretary, [Grant Shapps](#), overrode official advice to review Government policy on environmental grounds. The signs are that the Government is beginning to prepare to put its policy and public spending proposals through a net zero filter, which is exactly what Wiltshire Council needs to do in relation to the Local Plan.

With regards other aspects of land use; no attempt seems to have been made to assess the value of existing farms, their contributions to public benefit or their future potential in the Plan period. This serious shortcoming is embedded in the construction and application of the site selection criteria. For the 'preferred sites' for Chippenham, for example, the Interim Sustainability Appraisal (Section 5.2.5) simply comments that "given the significant size of this site, there will be a significant loss of greenfield, agricultural land of medium quality," ignoring the fact that there is a significant amount of Grade 2 and 3A (the Best and Most Versatile) land. Similarly, there is no consideration of farmland (or its use for local food production, tree planting or renewable energy generation) as an alternative or any value placed on the loss of such. Neither is its value considered in terms minimising vulnerability to surface water flooding or locally valued landscapes, or in relation to the landscape aim to "conserve and enhance the character and quality of rural and urban landscapes, maintaining and strengthening local distinctiveness and sense of place" and 'minimise the impact on locally valued landscapes".

Well managed farmland with community connections also has the capacity to contribute positively to achieving carbon reduction targets as well as "healthy and inclusive communities," but this seems to be neither recognised nor evaluated. The lack of attention to

the current and future benefits of farming and the costs of its loss is further exemplified in the Empowering Rural Communities document, in which the words “farm” and “farming” are completely absent. This lack of attention to the value and negative impact of potential farmland loss is a serious weakness in the land use policies which underpin the site selection process and conclusions. Moreover this is contrary to the expectations of para 170 of the NPPF which states that “Planning policies and decisions should contribute to and enhance the natural and local environment by...(b) recognising the intrinsic character and beauty of the countryside and the wider benefits from natural capital and ecosystem services including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland.”

All of the above underlines the unspecified and hence unaccountable balance of qualitative judgements and evidence acknowledged contained within the Interim Sustainability Appraisal, which is seriously deficient, yet used to as a justification of the site selections put forward in the Spatial Strategy.

## **A2: What practical and achievable steps should the Local Plan take to significantly reduce carbon emissions by 2030?**

Despite warm words in its Local Plan climate change paper, and its [Climate Emergency declaration](#) in which the Council committed to seek to decarbonise the county, Wiltshire Council’s current Local Plan proposals would substantially increase the county’s carbon emissions and lock in emissions for years to come (i.e. precisely the opposite). To deliver outcomes that significantly reverse existing carbon emission trends, the planners need to radically change their approach to reduce car dependency and ensure future development does not increase, and ultimately reduces carbon emissions (e.g. through renewable energy generation and carbon sequestration).

Taking Chippenham as an example, this would mean an employment led plan that radically reduced the need for additional commuting. It would mean abandoning a spatial strategy that simply encourages relocation from other settlements along the M4 corridor, and further embeds dependency on commuting. It would mean reducing housing numbers to genuinely meet local needs, and certainly not further exceeding current levels of growth (which are already based on in-migration). In Chippenham, for example, growth is predicted at 250-300 people per annum by the Office for National Statistics (ONS), which equates to 2,500 houses (at most), rather than the 9,225 currently being proposed, for the 20 year period to 2036. However, given that none of the 26ha of employment land current Plan Period (2006-2026) has yet been built on, it would be better to hold back on further housing development until employment sites are built upon and local employment opportunities are available. This would also have the advantage of not requiring an extensive distributor road with extended river crossings (up to 0.5km long each) across a flood plain, and bridges over the Wilts-Berks canal, all of which would have a massive associated carbon footprint. Neither would there be the need for extensive destruction of land that acts as a carbon sink, which would release huge quantities of carbon and remove the potential to capture carbon in future.

Appropriate and sustainable housing numbers supported by investment in attracting suitable employers, bringing skilled jobs into the area, would have effect of reducing commuting and private car dependency. More innovative approaches to public transport, including rail (e.g. new stations at Devizes, Corsham and potentially Hullavington) would help reduce the need for remaining necessary longer journeys by road. Genuinely sustainable transport policies, promoting investment in active travel and electric vehicle charging infrastructure, would help reduce emissions from shorter journeys in and around the local area. Net zero carbon development policies, and related policies to promote local renewable energy generation, of

the type being put forward by the Chippenham Neighbourhood Plan, would mean no additional emissions for the development itself.

### **A3: How should these actions be delivered and measured?**

They should be delivered through local employment-led development and net zero carbon development/ sustainable construction/ renewable energy promotion/ sustainable transport policies such as the ones highlighted above and [recommended by the Climate Emergency Task Group](#). These should be measured in terms of their net carbon emissions over time and adjusted accordingly in line with Government's and Wiltshire Council's carbon reduction targets.

The Local Plan itself should establish its carbon reduction potential and targets for net zero carbon development ([as recommended by Client Earth](#)), including preventing emissions being generated as a result of:

- destruction of natural capital and removal of carbon sinks;
- construction of carbon intensive infrastructure (including embedded emissions in materials such as concrete and asphalt);
- additional transport mileage as a result of car dependency and commuting;
- operational emissions resulting from new housing and business/ industrial premises;

and avoiding emissions as a result of:

- local employment led development;
- highest possible standards of building insulation (for domestic and commercial);
- integrated and stand-alone renewable energy generation;
- innovative and progressive farming methods;
- investment in infrastructure to support active travel (for short journeys) and public transport;
- investment in infrastructure to support the transition to ultra-low emission vehicles.

The carbon emissions associated with proposed housing numbers in proposed locations should be calculated up front so as to properly inform the Plan and allow for the proper comparison of potential sites [at the outset](#). No sites should be designated as 'preferred' until such time as the climate change implications (including estimated tonnes of carbon emissions) have been calculated.

A means of monitoring the implementation of the Plan policies that drive the carbon reduction should be established alongside the Plan.

### **B1: If we are to successfully tackle flood risk and promote sustainable water management, would the measures set out above go far enough?**

As stated in the Interim Sustainability Appraisal report, flood risk will be exacerbated by climate change and whilst flood risk may be mitigatable for some sites, building on these sites can increase the risk of flooding elsewhere. It is therefore better to avoid building on low-lying land adjacent to existing flood plains (e.g. to the East of Chippenham) in order to reduce the risk of future downstream flooding (e.g. of Chippenham and other communities such as Melksham, Bradford-on-Avon and Bath).

In addition, the UK Climate Impact Projections have revealed that climate change impacts are manifesting more rapidly than anticipated, and areas adjacent to current undevelopable flood zones, could well become part of those zones in future. It would be unwise to rely on expensive Sustainable Urban Drainage Scheme (SUDS) solutions to mitigate flood risk that

is avoidable in the spatial strategy in the first place. In addition to the substantial cost and space requirement, claims that all new development would include SUDS to achieve a 'greenfield runoff rate plus 20%' seem unrealistically optimistic, and lack evidence. 20% may also turn out to be an insufficient margin to compensate for future climate change scenarios and the likely more intensive rainfall events that are the cause of rapid river level rises and associated downstream flooding.

**B2: If we are to successfully enhance our natural capital through place shaping and nature based solutions, would the measures set out above go far enough?**

The question is based on a false premise, since natural capital would not be enhanced by any of the proposed development, and would be spectacularly damaged in many of the spatial strategy's proposed site locations, including wiping out some huge areas such as the Avon and Marden valley to the East and South of Chippenham. Any measures to incorporate 'nature' within the proposed urban conurbations would be tokenistic relative to the scale of the loss of natural capital caused.

It is also far from clear what Wiltshire Council's Blue and Green Infrastructure Strategy is, or the nature-based solutions mentioned under Policy Theme 2 would actually comprise of, apart from aspirational statements about benefiting carbon sequestration, air quality improvements, passive cooling, health and wellbeing and biodiversity enhancement, which are precisely what the proposed spatial strategy would destroy.

The question seems disingenuous in that successfully enhancing natural capital requires that it isn't destroyed in the first place. Hence, lower, more sustainably located housing numbers would help avoid building on valuable habitats and carbon sinks, such as the Avon and Marden valley and land surrounding Bradford on Avon. High quality pasture land and river valleys are finite and irreplaceable, and need to be protected and enhanced in their current state.

In terms of how to limit the destruction of natural capital that the spatial strategy would destroy; a starting point would be to estimate the value of natural capital that would be lost on the proposed sites so as to be transparent about the damage to the climate and environment that would result if the current Plan proposals were implemented. This would support the case for lower numbers of houses, less hard infrastructure intensive development and selection of sites on which the destruction can be limited.

**B3: If we are to successfully plan for a net zero carbon future through sustainable design and construction, would the measures set out above go far enough?**

No. The adoption of policies that require net zero carbon development in line with the UK Green Building Council (UKGBC) approach, and as other LPAs are including in their plans, and the promotion of renewable energy generation (e.g. on Council land and County farms) will be essential. However, these are necessary but not sufficient and their benefits would be wiped out completely by an unsustainable spatial strategy that substantially increased emissions by:

- release of huge quantities of carbon through the excavation of rich organic soils;
- removal of carbon sinks that would otherwise continue to lock in and further sequester carbon in future;
- construction of carbon intensive infrastructure (including embedded emissions in materials such as concrete and asphalt);
- additional transport emissions as a result of new commuter extensions.

In other words, planning for net zero requires both sustainable housing numbers, a sustainable spatial strategy and sustainable (net zero development and renewable energy generation) policies, to have any chance of meeting the Government and Wiltshire's net zero targets.

**B4: Is the move to a position where all new development is rated as zero carbon achievable from the date the Local Plan is adopted (i.e. from 2023)? How might this be achievable and if not, why not?**

It is possible to have a net zero carbon development policy that would ensure net zero operational emissions for all the allocated sites in the Local Plan, as is already the case for some adopted Local Plans and other LPAs are doing in their emerging plans. This should be backed up by strong sustainable (low carbon) construction and renewable energy generation policies. These policies will not, however, prevent the destruction of carbon sinks or require the lost sequestration is compensated. Neither will they prevent the transport emissions that results from poor spatial planning and place shaping, the negative effects of which could wipe out the positive effects of such policies.

With regards achieving net zero carbon new development; by undertaking viability assessments on strategic sites as part of the revised Plan, as is now required, the viability of proposed development will be clear from the outset and developers will price in any additional costs into their land deals. Once a clear net zero development policy has been set, the additional costs of carbon neutral development will fall rapidly, as this becomes the standard method of building and developing sites. Government net zero carbon targets require this to happen as soon as possible and a net zero development planning policy needs to be put in place as soon as possible, given that Core Policy 41 is defunct and the badly insulated houses being given permission at present will all need to be retrofitted in future.

However, as stated above, a net zero carbon development policy is necessary but not sufficient to achieve a carbon neutral or carbon negative Local Plan. Such a Plan also requires that development is only allowed in locations that do not significantly undermine the Government's (and Wiltshire Council's) carbon reduction (net zero) targets. Hence, the spatial strategy itself needs to support net carbon neutrality, focused on providing housing where there is employment (i.e. to be 'employment led'), avoiding the destruction of natural capital and carbon sinks, avoiding climate damaging, carbon intensive infrastructure (and locations that require this) and removing rather than increasing dependency on private cars to get around.

The current proposals would unnecessarily destroy natural capital/ carbon sinks and increase transport emissions through commuting, whilst bearing no relation to local employment or local housing need, which would be better achieved through urban regeneration/ brownfield sites. The latter would be provide affordable housing (e.g. apartments), reduce the need for cars and help rejuvenate the town centres of principle settlements and large market towns that are in danger of being doughnuted (i.e. having suburbs supported by in-migration and out-commuting, that are disconnected from town centres, with separate shops and services, leading to further deterioration of town centres, vacant shops, and unused town centre facilities).

**B5: Would a move to support the delivery of zero carbon new development materially affect scheme viability?**

Determining the viability of Local Plan policies on strategic sites at an early stage (as set out in the 2018 revisions to the NPPF) will ensure any cost implications are incorporated into early land purchase decisions. There is considerable evidence for the viability net zero

carbon development policies in Local Plans (please refer to the [Centre for Sustainable Energy](#) for examples and background papers). The need for net zero carbon development is set to increase in future, as the Government requires planning decisions to prioritise climate change considerations. Viability will become a secondary issue as policy and legislative requirements ramp up. Once net zero carbon development policies become more mainstream, additional cost will no longer be material. Developers claims that they can't afford to develop sites to net zero should be taken with a pinch of salt. It is no longer a choice in any case.

Overall, Wiltshire Council needs to worry less about viability, accept the inevitable changes that are coming and focus on:

- developing a carbon neutral spatial strategy;
- putting a robust net zero carbon development policy in place;
- actively promoting renewable energy development, including on its own farms (and using these for food production/ tree planting and renewable energy generation rather than selling for short-term financial gain);
- putting policies in place to promote the transition to ultra-low emission vehicles (waking up to the fact that electric vehicles as will be the norm by the end of the Plan period).

**B6: In terms of performance standards for new buildings, what method(s) should the Council aim to implement?**

The improvement in Part L of the Building Regulations being introduced as part of the Future Homes Standard is necessary but not sufficient in achieving net zero carbon development. The Government has indicated that it will not restrict local authorities from exceeding this standard, which several leading local authorities are already doing through their local plan policies. This includes Plans that have already gone through Examination and been adopted, such as the London Plan.

In addition to decarbonising its spatial strategy, the Council needs to put in place a policy that requires all development be net zero-carbon, in line with the UK [Green Building Council's Net Zero Carbon Buildings Framework Definition](#). This would require all development to achieve an annual operational net zero carbon emissions balance by:

- prioritising energy efficiency through the building fabric;
- reducing the remaining energy demand through on-site renewable energy and heat (e.g., rooftop solar PV and/ or air or ground source heat pumps); and
- compensating for the residual carbon emissions via a [carbon offset fund](#), into which developers are required to pay a value agreed at the application stage, to deliver carbon savings which would not otherwise have been made (ensuring additionality).

The Building Research Establishment's [BREEAM](#) offers a range of sustainability assessment methods and standards for [masterplanning](#) projects, [infrastructure](#) and [buildings](#) from [new construction](#) to [in-use](#) and [refurbishment](#), which can be used in guidance to supplement an overarching net zero development policy in relation to individual (particularly commercial) buildings.

**B7: How should the Council support the retrofitting and modernisation of existing buildings to achieve higher performance and reduce carbon emissions?**

This could be done via a policy to support the retrofit of insulation (including double glazing) and renewable energy generation devices (e.g. solar panels and ground source heat pumps) in conservation areas and listed buildings, subject to other relevant local planning

requirements, although this would make a small difference in terms of overall impact. It is unclear what the Local Plan could do, if anything, to promote the retrofit of existing buildings, which needs to be a priority for Wiltshire Council to address, and would make a substantial difference in terms of reducing carbon emissions.

**B8: If we are to make headway in terms of decarbonising energy production, consumption and emissions, would the measures outlined above go far enough? If not, what are we missing and how would additional measures be delivered?**

The key element that is missing (in so far as it isn't even raised or has any questions on) is the overarching proposed housing numbers and spatial strategy. Other Local Plan policies could be regarded as sticking plasters for a strategy that imposes an out-dated model of immigration, car dependency and the destruction of natural capital, carbon sinks and productive farm land, all of which are critical to reaching net zero and preventing devastating climate change. It has already been established that the proposed excessive housing numbers bear no relation to local housing need or can be supported by local employment, which would allow people to not have to commute. In other words, the entire Plan is based on an unsustainable approach that sets itself up to fail in terms of carbon reduction and the Government's and Wiltshire's net zero targets.

The question that needs to be asked of Wiltshire Council (rather than Wiltshire Council asking of its residents) is "How will this proposed Plan cut carbon emissions in line with the national targets, as it is required to do under planning legislation that refers to LPAs obligations under the Climate Change Act?" (i.e. at least 68% reduction on a 1990 baseline by 2030). This does not seem to even feature in the preparation of this Plan yet is the fundamental question it should be addressing. The consultation documents have not even produced any estimate of the carbon implications of the Plan, let alone calculated how the housing numbers proposed and spatial strategy being promoted would contribute to reducing overall emissions.

Once the Plan has begun to address the fundamental issues above, it almost goes without saying that its Local Plan policies need to ensure emissions from any development that takes place are neutral or negative.

Planning policies should require that:

- all development (housing and commercial) is required to meet net zero carbon standards in line with the UKGBC approach (i.e. energy efficiency, on-site renewable energy and heat generation and carbon offset through off-site renewable energy generation for any remaining operational emissions) as soon as possible;
- promote renewable energy generation, such as solar and wind on suitable sites, identifying Wiltshire Council land (including sites within farms/ County Farms) to contribute (e.g. through Local Plan Development Orders) and working closely with Neighbourhood Plans in identifying other locally preferred, suitable sites;
- sustainable (low carbon) construction, including embedded carbon in materials such as concrete, aggregates, plasterboard and tarmac, procurement of products and services involved in construction and the transport and on-site activities associated with the construction itself;
- Planning policies should stop any further installation of natural gas for heating and cooking ahead of it being completely [phased out in new homes from 2025](#) and support the transition to renewable heat such as air and ground source heat pumps;

- require the installation of EV charging infrastructure in anticipation of the [cessation of petrol and diesel vehicle sales from 2032](#) and the transition to EVs over the course of the Plan period;
- set water efficiency standards to help reduce emissions from energy used in pumping.

The carbon emissions associated with the emerging Spatial Strategy should be calculated in advance, including the emissions associated with different site options, to enable a transparent planning process and informed decisions to be made about housing numbers and potential development site locations.

**B9: Should the Council set out policies that favour particular technologies, or should it encourage all technologies to provide green energy in Wiltshire?**

It should allow for all technologies but take account of their effectiveness, efficiency and any potential environmental and social impacts. This would allow for future innovation and adaptable approaches, which could help a faster transition to net zero. Working with communities, including for example community energy organisations, will be an important aspect, helping to ensure renewable energy generation is suitably located and recycling benefits directly back into the local economy/ community.

**B10: Should the Local Plan set targets for the production and use of renewable energy? If so, what might they be and how would they be measured?**

Yes. Local Authorities have a key role in ensuring the UK meets its climate change targets. Section 18(1A) of the updated NPPF requires the planning system supports the transition to a low carbon economy and in particular *“should help shape places that contribute to radical reductions in greenhouse gas emissions”* and that *“Plans should take a proactive approach to mitigating and adapting to Climate Change... in line with the objectives of the Climate Change Act.”*

The Local Plan should therefore set a net zero target based on an assessment of its carbon reduction potential and develop policies consistent with this target. The generation of renewable energy will be critical in achieving this target, alongside a genuinely sustainable Spatial Strategy and carbon neutral development policies. Separate interim targets could be set for the generation of renewable energy during the Plan period, consistent with the overall net zero target.

These would need to be ambitious and regularly reviewed, since early investment/ front end loading will be critical given the amount of time it takes to develop proposals and the planning application process. In other words, the net zero target will be much more achievable if emissions reductions begin early and the large scale investments needed are delivered in the early part of the Plan period.

Measuring progress will also be important and will require a baseline and means of updating. This should be relatively easy in relation to any significant ‘ground mounted’ renewable energy generation sites. Whilst more challenging to keep track of domestic and commercial renewable energy and heat generation, there are an increasing number of more sophisticated tools that can be used, such as the [community-scale carbon footprint tool](#) developed by the Centre for Sustainable Energy and Exeter University.

**B11: What steps should be taken to retrofit existing buildings with ultralow or zero carbon forms of energy production? In particular, how could such technology be incorporated into buildings within sensitive locations such as Conservation Areas and/or Listed Buildings?**

Existing policy already allows for retrofitting and adapting existing buildings to accommodate ultra-low carbon or zero carbon forms of energy generation. This includes in conservation areas and listed buildings, providing they are sympathetic to their setting and significance but enhancements could be made to the latter. The main imperative for Wiltshire Council is to promote retrofit of existing buildings throughout the county, which is beyond the scope of the Local Plan to influence as far as we are aware. The Local Plan priority should be on sustainable housing numbers in sustainable locations that don't destroy carbon sinks and promote commuting, backed up with net zero carbon development, sustainable construction and renewable energy policies, including LDOs for suitable Wiltshire Council farms, such as the ones in Chippenham.

**B12: If we are to tackle issues associated with air quality would the measures set out above go far enough and be effective in improving air quality in Wiltshire? If not, what measures are we missing and how should they be framed in land-use planning policy?**

The paper states that "the Council considers that increasing the level of self-containment within Wiltshire's settlements offers the best solution for tackling unsustainable, carbon-based travel patterns." It further states that "to achieve this goal, the Local Plan will likely need to set out policies for reducing travel and the use of private carbon fuelled vehicles." Despite this, its spatial strategy promotes large urban commuter extensions, requiring climate damaging infrastructure and locking in tailpipe emissions and pollution, as a result of increased commuting and localised travel for many years to come.

A more organic growth/ local employment-led development approach, with supporting policies, would prevent large scale commuting and associated air pollution. Sustainable (active and battery enhanced) travel options within sites would reduce the need to use cars for local journeys. Employment development should promote high skilled jobs in order to minimise out-commuting and allow people to live near their place of work, thus reducing air pollution associated with a daily commute. This is particularly acute in towns like Chippenham and Melksham where thousands of vehicles drive through all parts of the town to the A350 and up to the M4 and onwards to their places of employment, contributing substantially to air pollution at peak periods, which also coincide with children walking to school and breathing in the NO<sub>x</sub> gases and particulates.

The currently proposed excessive housing numbers and spatial strategy would simply add to this air pollution and damage to young people's health, as well as creating even more air pollution in town centres, as a result of all the additional vehicles associated with the urban extensions. Taking Chippenham as an example, the 7,500+ houses and associated suburbs to be built in open countryside, resulting from the HIF funded road bid dictating the spatial strategy, would generate potentially 15,000 more cars and vans, the vast majority of which would drive into Chippenham or Calne to access shops and services, creating even more air pollution and the need for Air Quality Management Areas (AQMAs) in both settlements. We already see this pattern in the most recently built estates at Cepen Park North and Cepen Park South, with no reliable regular bus services to offer any alternative, and few people cycling into town. The air pollution caused would run counter to Wiltshire Council's own Air Quality Strategy and hugely undermine all the efforts taken to improve air quality thus far.

Policies to control the use of wood burning stoves/ heating in densely built-up areas are needed to reduce non-vehicular air pollution, which seems to be a growing problem in residential areas in Wiltshire, affecting young people's health and future disease (asthma, lung and heart related) exacerbation in particular.

If Wiltshire Council is serious about addressing air quality, it needs to completely reassess its approach to housing expansion and come up with a Plan that reduces tailpipe emissions (and tyre and brake pad pollution) not increases them. The Council also needs to include a comprehensive strategy for cycling, walking and public transport to mitigate existing air quality issues and mitigate remaining additional air pollution that would result.

**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?**

An employment led spatial strategy would significantly reduce the amount of commuting and dependency on private cars. Policies that promote ultra-low carbon public transport and active/ battery enhanced active travel will then reduce the need for local car travel/ dependency. This will require policies that create dedicated, fast and safe cycle routes of the type common in other European countries, and a few parts of the UK. Policies should also promote integrated public transport that improves reliability and increases usage, and further reduces car dependency. Policies also need to promote the installation of on-street EV charging infrastructure to enable those who don't have off-street parking to charge their EVs.

**B14: The electricity grid system may not be able to cope with a rapid take-up of electric vehicles and the charging infrastructure needed to power them? What measures should the Council explore with Distribution Network Operators/Distribution Service Operators to resolve this?**

More local renewable energy generation and policies which support this will help overcome this challenge. Wiltshire should be more proactive in terms of working out how the distributor grid should work effectively. Distribution Network Operators (currently transitioning to being Distribution System Operators, with wider responsibilities for the distributed grid) are keen to work with Local Authorities in developing their local networks to meet a net zero carbon future. Government money is available for investing in this grid infrastructure and Wiltshire Council needs to work with the DNOs/ DSOs to ensure Wiltshire gets the grid investment needed to achieve net zero for our county. The main focus should be on upgrading grid capacity and infrastructure in the right places to enable renewable energy generation, EV charging and any other investments needed to help deliver net zero via the electricity distribution network.

**B15: If all new development is to be future proof and promote zero carbon living in energy production and consumption terms, what impact would this have on the design and viability of schemes?**

Much of this has already been covered. Wiltshire Council needs to bite the bullet and:

At a strategic spatial planning level:

- Reduce housing numbers to a sustainable level that will allow net zero emissions to be achieved;
- Develop a genuinely sustainable spatial strategy that does not promote and is not dependent on commuting;
- Reduce housing numbers to allow for more organic growth that will not cause the substantial harm associated with the current proposed strategy;

- Take an employment led approach (not a housing led one that works against achieving net zero targets);
- Measure the carbon emissions associated with the proposed spatial strategy options and prioritise minimising current and future emissions;
- Develop a framework for aligning the Local Plan with the Government's and Wiltshire's carbon reduction targets;
- Place proper value on natural capital and account for it in the Plan; and

At a policy development level:

- Develop and implement net zero carbon development policies and low carbon, sustainable construction policies;
- Develop and implement supportive renewable energy development policies, including policies that identify and enable renewable energy generation within council farms;
- Develop and implement supportive EV infrastructure policies;
- Work closely with the DNO/ DSO in developing the necessary distributed grid to enable net zero to be reached as quickly as possible;
- Develop and implement supportive integrated public transport and active/ battery assisted travel infrastructure development policies to discourage car use for short journeys.

The current proposals work in the opposite direction, particularly in terms the higher-level strategy, which seem to be driven by road building and a focus on commuter housing. With forward thinking policies of the type described above, design will take care of itself (the skills, knowledge and technology are already out there) and viability will quickly catch up. The key message is to be clear about the overarching objectives (net zero) and get the fundamentals right (i.e. do not plan for unnecessary, unsustainable and potentially undeliverable numbers of houses in order to create large commuter extensions that lock in transport emissions, destroy valuable farmland/ wildlife habitats/ carbon sinks, and take a lead from other LPAs on introducing net zero carbon development and effective renewable energy policies). The rest will follow.

## **Ecological and Biodiversity Impacts Supplement**

This supplement pertains to damaging ecological and biodiversity impacts for the 'preferred sites' for Chippenham and is submitted to illustrate adverse impacts on valuable wildlife habitats and biodiversity that may occur on sites across the county (there being absence of any detailed evidence to show otherwise).

### **i. Great Crested Newts**

Development of sites 1 and 2 would impact a population of great crested newts, the main areas of concern being:

**Habitat Availability** - a search of ordinance survey maps encompassing the widest proposed route through to the built environment of Chippenham was undertaken to take account of each of the proposed route and surrounding development. In this search area there are a total of 24 recorded ponds each of which have the potential to provide opportunities for breeding great crested newts. These ponds are largely clustered at the east of the search area where there are three confirmed records of great crested newts. The distribution of these ponds in addition to the confirmed populations in the immediate vicinity gives rise to the serious risk of directly harming newts and/or degrading their habitat quality in contravention of The Conservation of Habitats and Species (amended) (EU Exit) Regulations 2019. All three of the proposed routes are close enough to the identified ponds

to have potential impacts on newts should they be present. Insufficient data exists to conclude no impacts in this respect. To the west of this search area, an EPS Licence for great crested newts has been granted, indicating that a further or continued extant metapopulation is present at the western extent of the proposed road, further highlighting the risk to this species.

On top of the main search area an additional 2km in all directions was searched. This returned a further 76 ponds. The presence of these ponds and abundance of surrounding greenspace indicates wider suitability for this protected species in and around Chippenham. Confirmed records of great crested newts additionally exist to the south, south west and south east outside of the search area.

In short, the proposed development and associated roads would cause direct habitat loss and habitat degradation for this species in the long term, with short term impacts including disturbance, injury and death during works in the construction phase.

**Habitat Connectivity and Quality** - Great crested newts disperse over land to travel between breeding ponds of the wider metapopulation. This requires connected habitats to allow safe and successful dispersal. In its current state the search area and surrounding habitats are well connected via grasslands, hedgerows, and woodlands. This allows free movement of individuals between ponds in existing populations.

By developing a significant road and housing development where newts are present, a new and potentially harmful barrier to dispersal is introduced into the environment. Mortality of amphibians associated with large infrastructure is widely documented, including fast- and slow-moving roads alike, such as those proposed around Chippenham. Records of great crested newts are present to both the north and south of each of the proposed road routes, therefore each route presents a significant barrier to dispersal between northern and southern sub-populations, essentially isolating the northern subpopulation of great crested newts by encircling them in a limited expanse of greenspace. This, in combination with the proposed increase in residential developments (direct habitat loss and short term harm) will put substantial and significant strain on a protected species by limiting gene flow through the population, reducing breeding success and reducing quality of and availability of foraging and breeding habitats.

In addition to the above the remaining ponds to the north of the road will likely be subjected to degradation in quality through polluted road and surface water run-off. An increase in nitrogen content would also be anticipated (i.e. reduction in water quality) due to increased human activity in the area due to the increase in residential developments, and reduced availability of permeable ground. These factors combined have significant potential to alter the character of the ponds, including flora and fauna associated with them. This will reduce the potential value of the ponds by influencing the existing faunal and floral communities and subsequently reduces the breeding success of newts. This could ultimately result in the local extinction of great crested newts to the north of the proposed roads.

**Translocation** – whilst a translocation of great crested newts is offered as an option to mitigate for the harm expected from one of the road routes (though in reality would be required regardless which route was adopted), it should be stressed that a translocation has the potential to spread diseases and pervasive plants associated with pond life e.g. chytridiomycosis, duck weed, *Elodia* sp. Etc. and should only be used as a last resort, even if practically possible in these circumstances.

Significantly more information is required to assess the actual impact the development proposals would have on great crested newts. A population assessment should be

undertaken to determine the anticipated impacts associated with all three routes. It is naïve and negligent to assume absence of newts in either case when there is significant potential for harm associated with these proposals.

## ii. Bats

Of particular concern regarding these proposals is the potential they have to impact common and rare bat species, to which no consideration has been given. All species of bat are protected under The Conservation of Habitats and Species (amendment) (EU exit) Regulations 2019, which provides protected status to the bats themselves, their roosting sites and their foraging and commuting habitats.

**Foraging Habitat** - the western extent of the proposed road sits between 4-5km to the east of Bath and Bradford upon Avon Special Area of Conservation (SAC) which has direct habitat connectivity to Chippenham via a network of hedgerows, woodlands and a vegetated railway line. This SAC is a statutory designated site identified as being of international importance for bats. It is known to support up to 15% of the UK population of greater horseshoe bats during the swarming and hibernation seasons, with other rare species recorded including Bechstein's bats, lesser horseshoe bats and barbastelle. At least one maternity roost of greater horseshoe bat is known to be present within the SAC with more likely to be present indicating of year-round use of the site. These roosts are of high conservation significance and are frequently recorded within the SAC and its surrounding environment. The NPPF indicates that applications should be refused where impacts are anticipated on SAC's and their ecological receptors, which these proposals will likely do (Section 15 paragraphs 175 and 176).

Conservation of greater horseshoe bats is of particular concern with these proposals given their 90% decline in their native UK range over 100 years. Distance travelled from the roost is key in this case, with greater horseshoe bats known to travel 4-5km for foraging purposes. Given this, and the proximity of Chippenham to this SAC, there is a very high chance that farmland around Chippenham will be of value to foraging greater horseshoe bats. Ideal foraging habitat is cited as being a mosaic habitat of cattle grazed fields with pockets of woodland, which is typical of the wider Chippenham area and will be directly lost to the proposed roads and associated residential development. When considering the additional pressure of increasing volume of residential development in addition to the road itself and associated traffic on what is currently highly suitable foraging habitats there is likely to be a significant adverse impact on this species. Proposals for the various schemes indicate that up to 800 hectares of quality foraging habitat will be put at risk as a result, for which no mitigation has been proposed. This is in contravention of The Conservation of Habitats and Species (amendment) (EU Exit) Regulations 2019, which affords protected status to the bats themselves as well as their roosts and foraging and commuting habitats.

It should also be noted that bats will be using the search area for foraging purposes from much nearer roosting sites. For example, immediately north of the search area at the southern extent of Chippenham a granted EPS licence for a works around a lesser horseshoe roost is known. Individuals and colonies of bats in these areas will rely heavily on the immediate surrounding countryside for sustenance and greater consideration must be given to this.

**Habitat Connectivity** - the majority of summer roosts of greater horseshoe bats are located within 20km of the winter hibernaculum therefore it is a fair assumption that commuting bats will be using the railway corridors, river and brook corridors, cycle path corridor, hedgerows, woodlands and tree lines to commute between the winter hibernacula and the summer roosts. Similarly, Bechstein's bats have a catchment area of approximately 20-30km for their

swarming sites indicating the potential importance of the commuting corridors on their breeding success. Disrupting these flight paths will be highly detrimental to the widespread success of these species over a far wider area than just Chippenham, with consequences likely to be felt over a much wider zone of influence. Such disruption comprises the direct impact of habitat removal and/or degradation due to pollution etc., but also the major potential impact of artificial lighting due to encroachment of development and roads further and further into the countryside (over habitats noted as particularly important for the conservation of greater horseshoe bats).

All species of bat are nocturnal however greater and lesser horseshoe bats are noted as being particularly light averse, therefore increased artificial lighting anticipated as a consequence of the development proposals will reduce the value of their existing commuting corridors and foraging territories. Even low levels of lighting will deter these species, and strategic lighting strategies are not capable of fully mitigating for the increased lighting associated with the new residential areas and street lighting on the expected scale of these proposals (e.g. increasing sky-glow and conspicuous points of origin). This puts these light averse species at a competitive disadvantage to more light tolerant species in a region of the UK considered to be the stronghold for the remaining population of greater and lesser horseshoe bats.

It should be stressed that the commuting and foraging habitats of these species are protected under the same legislation as the roosting sites and cannot be dismissed given the highly damaging consequences on rare species. The NPPF (Section 15 paragraph 180) indicates that developments should be suitable for their locations, specifying that light pollution for nature conservation must be considered. In this case this policy is of particular importance given well documented detrimental impact of artificial lighting on these highly rare species near an SAC designated for these same species.

The potential impacts outlined here detail the concerns relating specifically to greater horseshoe bats and Bechstein's bats, however the same issues will be experienced by all species of bat known in the locality of which there are many – a data search with Swindon and Wiltshire Biological Record Centre will show more detailed information, including many uncommon and extremely rare species, which are known to be present in roosts of high conservation status.

### **iii. Birds**

The impact of the proposed roads and associated development on birds must also be considered, with the loss of habitats expected to be detrimental to populations of resident and migratory species alike including IUCN red and amber listed species. Agricultural land such as that anticipated to be cleared provides essential resources for winter visitors such as fieldfare and redwing, and summer migrants such as lapwing, which are all known to be present in the area. It can also form a foraging resource for raptors including barn owl, little owl, kestrel and buzzard as some examples. Riverine species will likewise be impacted, with little egret, kingfisher and grey herons known in the area.

The detrimental impact of roads and traffic on birds is well documented, with many species sensitive to the disturbance associated with them often as a result of increased noise and vibrations. In many species this results in reduced foraging success, reduced nest success and reduced population density, with the impact felt more heavily by shy and less common species. Similarly, the installation of the aqueducts will require a significant quantity of work over a prolonged period at the bank of the river. Various water fowl will likely be affected by such works by deterring breeding attempts in the area and destruction of suitable foraging and nesting habitats.

Mortality of birds on the road upon completion will also be expected. Young barn owls in particular are vulnerable to traffic as they migrate away from their nests, though all local species will be at increased risk. Protected species will be put under pressure as a consequence.

Further information needs to be provided to determine the extent to which avian communities can be expected to be impacted by the road proposals given the diverse use of habitats employed by each species. Moreover, the cumulative impacts of the road and residential schemes that are proposed must be considered in tandem to fully account for the overall impacts that will be felt. Breeding bird surveys and winter bird surveys should be carried out, however to date no information has been provided. This should be carried out in sufficient time to inform site selection.

#### **iv. Hazel Dormice**

Hazel dormouse have potential to be disproportionately affected by these proposals. Records of hazel dormice in the area are slim, however a granted EPS licence from 2014 for hazel dormouse located to the south west of Chippenham demonstrates that they are in the area, therefore must be fully accounted for in any development proposals. Dormice are primarily an arboreal species which rely heavily on having a continuous network of interconnected branches to survive and as such are typically found in hedgerows and well connected mature woodlands with a diverse species composition to provide year-round opportunities and a well-structured understorey. Due to their arboreal nature their dispersal capability is heavily reliant upon the connectivity in their environment, particularly in large infrastructure projects where a large number of hedgerows and tree lines can be expected to be perforated.

Much in the same way that great crested newts will be impacted, any hazel dormice on the Chippenham side of the proposed road will be isolated from the wider environment. This will limit gene flow through the population, reduce opportunities within the wider landscape and fragment habitats which are currently well interconnected. Mitigation for this species is not straightforward and can be very costly due to the highly specific habitat requirements for supporting a population as outlined briefly above. Hazel dormice are protected under The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019, providing protected status to the dormice and their habitat, which must be protected in line with this legislation.

The status of hazel dormouse should be properly established to accurately determine the impact this road could have on any local populations, particularly given their reliance on unbroken networks of woodland and hedgerows.

**Terrestrial Habitats** - the implementation of a new road will invariably contribute to both air pollution and nitrogen deposition into the soil in areas currently free from such pressures, including Bencroft Hill Meadows SSSI, which is an unimproved neutral lowland meadow which supports highly sensitive botanical communities which are vulnerable to nitrogen deposition. Increased soil nitrogen puts these rare communities of plant at a competitive disadvantage compared with common ruderal species known to outcompete rarer plants under nitrogen rich conditions such as common nettle. Unimproved lowland meadows are a particularly rare habitat type in the UK given the extensive agricultural history of the country and are included as a Priority Habitat under the Natural Environment and Rural Communities Act (2006). Measures must be taken to ensure that valuable habitats such as this SSSI, but also vulnerable woodlands and watercourses are fully accounted for in this scheme.

It should also be noted that sites like Bencroft Hill Meadows SSSI and other such local wildlife sites will be subject to a much greater visitor pressure as a result of a net gain in

households in areas currently comprising greenfield land which could easily result in soil compaction and trampling, which many of the rarer species recorded in the area are unable to recover from.

Losses in biodiversity will be incurred through direct habitat loss to facilitate any roads including significant grassland cover and hedgerow losses. Given the wide-reaching impact this will have, this scheme will not be capable of delivering no net losses in biodiversity without significant investment into improving surrounding habitats, which would be difficult to achieve with the added complication of residential suburbs being included. Biodiversity net gain would be significantly more difficult to achieve as a result. The DEFRA Metric 2.0 should be used to measurably demonstrate the impact these proposals would have, and where net losses are predicted consent should not be given.

The fragmentation and loss of the habitats which will be anticipated to be cleared if the proposed schemes go ahead has the potential to be directly detrimental to numerous species and contravenes guidance set out in NPPF Section 15 Paragraphs 170, 171 & 175.

#### **v. Rivers and watercourses**

There is the potential that development proposals will impact upon the River Avon and smaller waterbodies in the area. Polluted runoff from the proposed road will be unavoidable, with fuel, oil and particulates at some stage making their way through to the watercourses through entering groundwater or via surface water runoff. This type of pollution is widely documented to have a damaging effect on water quality and subsequently the flora and fauna associated with the rivers.

There will be an inevitable increase in total surface run off as a consequence of increased sealed surfaces associated with the road and residential developments. Whilst the road proposals indicate that clear span-type aqueducts will be used to avoid impacting the flood plain, no mention is made of how the increased runoff would affect the river character (i.e. increased water speed and/or levels, water acidity etc.), and how this might subsequently impact resident wildlife. For example, otters are known to use the Chippenham stretch of the River Avon and are protected under The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019. Further records exist in nearby areas including Corsham, and an otter roadkill was identified in Chippenham Town Centre, therefore their presence is widely documented in the area. The potential change of river character, disturbance from extensive and prolonged works and residents, in addition to an increased potential for fatalities on the roads over the long term will increase pressure on another protected species which has again been left unmentioned in the proposals.

The river Marden is also likely to be impacted by the work proposals. Significant work has been put into restoring the river Marden for the benefit of biodiversity, including targeted methods for improving habitats for brown trout which are known to be threatened. A publicly available survey report from 2015 indicated that's the river Marden was failing with respect to its target condition by having exceeded its target level of pollutants. Remedial works may since have been undertaken, however by increasing human activity in the region between Chippenham and Calne existing measures are likely to become insufficient, and would serve only to increase the pollution levels (including phosphates) in the river. This threatens all users of the rivers and reduces its suitability for brown trout and other such fauna. No monitoring or mitigation has been proposed for this, nor any commitment to its prevention been indicated.

More consideration must also be given to wider aquatic fauna including other species of fish, white clawed crayfish (if present) and the many aquatic invertebrates which support the river system and the wider riverine food web.

## 5. TRANSPORT REVIEW

### Introduction

In passing, on 26 Feb 2019, Motion 13 Acknowledging a Climate Emergency and Proposing the Way Forward, the full Wiltshire Council noted, inter alia, *“it is imperative that we as a species reduce our CO<sub>2</sub>eq (carbon equivalent) emissions from the current 6.5 tonnes per person per year to less than 2 tonnes by 2030... Thus, governments at all levels: national, regional and local, must change legislation, standards, infrastructure and their approach, to meet the need to reduce CO<sub>2</sub>eq emissions...”*. Full Council believes that, *“1. Wiltshire Council recognises it cannot and should not wait for national governments of any political party to act where it can take action itself. 2. It is important for the residents of Wiltshire that its Council commits to reducing CO<sub>2</sub>eq emissions and works towards carbon neutrality as quickly as possible.... 4. The consequences of global temperature rising above 1.5°C are so severe that preventing this from happening must be humanity’s number one priority. 5. Bold climate action by Wiltshire Council will demonstrate real leadership and can deliver economic benefits in the County in terms of new jobs, economic savings and market opportunities, as well as improved well-being locally and for people worldwide.”*

Full Council called on the Cabinet to, inter alia:

- “1. Acknowledge that there is a ‘Climate Emergency’.*
- 2. Pledge to make the County of Wiltshire carbon neutral by 2030.*
- 6. Continue to work with partners in the private sector and civil society across the County and region to deliver this new goal through all relevant strategies and plans”.*

This obligation obviously applies to the Local Plan Review, as the framework for growth, spatial planning, land-use and housing before and after the 2030 carbon neutral target is reached. With the right spatial strategy, the target is still achievable; with the proposed one, it is not.

The pressure on Wiltshire to go carbon neutral, from UK’s international treaty obligations, central government and its own concerned citizens, can only be expected to increase year on year. There may well be pressure, too from citizens and businesses whose own perceived short-term private interests conflict with this commitment. And it is well-known that delays to initiatives will bring the need for abrupt and urgent action. Wiltshire Council needs to act early, and lead with clear commitment, communication and public education.

### Highways, Transport and Waste

These are policy areas vital to meeting the target. Transport emissions are some 40% of Wiltshire’s total (all the Council’s own emissions, some 1%). Unlike Housing, where specific growth targets are being imposed by central government. As the Highway Authority, and a Local Transport Authority, Wiltshire Council has extensive powers over network management, parking, Traffic Orders, and transport infrastructure policy and investment, including the ability to draw down large-scale capital funding from central government including DfT and MHCLG.

At least one Wiltshire Council senior officer is in the Association of Directors of Environment, Economy, Transport and Planning (ADEPT). The January 2021 ADEPT report, ‘A blueprint for accelerating climate action and a green recovery at the local level’, supported also by the Local Government Association of which Wiltshire Council is a member, refers to such priorities as *“1. Invest in low-carbon and climate-resilient infrastructure”* and *“4. Make it easy for people to walk, cycle or use public transport and to work remotely / flexibly”*.

The 'Addressing Climate Change and Biodiversity Net Gain' report released as part of the Local Plan Review makes the point that in Wiltshire transport is responsible for some 40% of all emissions, so it is absolutely fundamental to tackle this issue as a matter of urgency. Yet the proposals in the Plan, particular in the north and west of Wiltshire, are based on the presumption of car-based development along a highway corridor, in stark contrast to the shift in thinking at a national level. The Climate Emergency is not even mentioned until p.36 of the Wiltshire Local Plan Transport Review ('WLPTR'), in an Appendix, and "more explicit consideration of the carbon reduction agenda" is considered to be one the 'next steps' proposed in Section 4.4 of the document. This is completely the wrong approach to future planning with a net zero target in mind. Environmentally sustainable development should be the underlying premise for the Local Plan Review and not an afterthought.

We would suggest that a revised version of the Local Plan be informed by the report from the RTPi ['Net Zero Transport: The role of spatial planning and place-based solutions'](#)

### **Lack of a new Local Transport Plan – LTP4**

In a response to a Cabinet 19 May 2020 Question from Colin Gale (Pewsey Community Area Partnership), the response of the Cabinet Member for Highways, Transport and Waste stated, "The *Council is currently developing its 4th Local Transport Plan – LTP4 - (largely shadowing the Local Plan Review). LTP4 will comprise a core strategy document supported by a number of daughter documents including a Freight Management Strategy.*" and added, "Timetables for the Review of the Local Plan and the Local Transport Plan are both affected by the current pandemic due to the difficulties associated with consultation. The working assumption for the Local Transport Plan (and associated Freight Strategy) is that there will be drafts to share in Autumn 2021."

Wiltshire's first full LTP (LTP1), published in July 2000, covered the period 2001/02-2005/06. The second Wiltshire LTP (LTP2) covered the period 2006/07 – 2010/11. The current LTP covering 2011 to 2026 was published in March 2011 - ten years ago, and two-thirds of the way back in its scope.

Although it paid lip-service to climate change LTP3 was developed long before the 2030 carbon neutral Wiltshire target. It did not quantify modal shift from private car to active travel and public transport. Its plans for these modes have been severely under-implemented compared with road building on the A350. Little has changed in terms of modal share. LTP3 is now unfit for purpose in the context of the climate and biodiversity emergencies.

The contents of LTP3 are entirely incompatible with "Addressing Climate Change and Biodiversity Net Gain" in many details and the main thrust. As an emerging plan, the Local Plan needs to take precedence over the ageing LTP3. This makes current plans and spending under LTP3, such as the proposed A350 Melksham bypass, highly problematic.

Transport and the location of housing and commercial development are intimately linked. It is regrettable that the public phase of an LTP4 process has not started, as the previous iterations took at least two years to from initial consultation to completion.

Consultees are having to piece together the transport implications of the Local Plan Review proposals piecemeal, from the Spatial Strategy, Community Area and Supporting Documents.

- Strategic Planning should liaise with Transport to speed up the initial LTP4 process, especially if widespread rejection of the Local Plan Review proposals leads to a re-drafting, but in any case.

- Local Plan policies relating to transport should reflect the need for reducing the need/demand for travel, urgent modal shift to active travel, public transport, demand management for road capacity, and the corresponding choices of location for development.

### **Other transport-related plans that are missing or out-of-date:**

#### **Wiltshire Rail Strategy**

In response to a Council 26 February 2019 question From Councillor Ian Thorn, Calne Central Division, the Cabinet Member for Highways, Transport and Waste stated, “*With funding from Swindon and Wiltshire Local Enterprise Partnership, we are currently developing a ‘Swindon and Wiltshire Rail Strategy’ which is planned to be completed by Spring this year. It is anticipated that, following review and further consultation, this will form part of a Wiltshire LTP4 to be developed over the next two years or so.*” Two years later there is no public evidence of review and this WCA representative knows of no consultation, though the SWLEP report was published in Summer 2019.

- At a minimum, the recommendations of the SWLEP Rail Strategy by the consultants Systra, and in view of the climate emergency the “best of the rest” with medium policy scores and deliverabilities should be incorporated into the Local Plan Review on the default assumption that they will be adopted by Wiltshire Council and incorporated into LTP4 in due course. The implications for the spatial strategy should be worked in.

#### **Integrated Transport**

The same response continued, “*At the local level, Core Policy 63 in the Wiltshire Core Strategy includes that: Packages of integrated transport measures will be identified in Chippenham, Trowbridge and Salisbury to help facilitate sustainable development growth...Transport strategies may also be developed for other urban and rural areas in the Plan area.*”

- An equivalent policy should be in revised Local Plan Review proposals, but with the elements of the packages clearly identified, not left for the future, since this identification was a task for the earlier Core Strategy. Transport strategies for the market towns and rural areas should be identified, with their main features outlined in enough detail to see their implications for development, evaluate them, and allow the community to support the authority in developing and implementing them within the very first years of the Plan.

#### **Walking and Cycling Strategies**

LTP4 is to include a review of Cycling & Walking Strategy, with a timetable still not yet clear.

The current “Wiltshire Local Transport Plan 2011-2026 Cycling Strategy” was first scheduled to be consulted on and published in 2011/2012. It came out in March 2014. A review of the strategy, and its fifteen Town Cycle Network Plan, shows that only a minority of its policies and measures have been implemented. It does not, of course, reflect the latest government policies and guidance such as Gear Change and LTN 1/20. It does not reflect the contribution of cycling to modal shift to active travel as part of climate emergency-responsive planning and transport strategies. An updated Cycling Strategy will need to be more ambitious.

A Walking Strategy was to have been produced in 2014 in parallel with the Cycling Strategy. At the time of writing, this WCA representative has been unable to find any such document or verify whether one was published.

- The Local Plan and LTP4 should both include walking and cycling strategies as supporting documents. Preparation of drafts and consultation on them should start urgently. The location of development and designs for new settlements should follow best practice in promoting active travel and managing the demand for motoring and the supply of road capacity and parking space. Walking and Cycling Strategies should be integrated with the Rights of Way Improvement Plan/Countryside Access Plan and the soon-to-emerge Green and Blue Infrastructure Strategy. See below.

### **Wiltshire Countryside Access Improvement Plan (CAIP)**

The 2015-2025 CAIP ('Rights of Way Improvement Plan 2') was described in the Wiltshire and Swindon's Countryside Access Forum's July 2019 review, "Maintaining the Rights of Way Network in Wiltshire: the Need for a Post Austerity Recovery Plan (PARP)" (Caf-row-paper-final-5-july-2019-pdf) as being in need of a refresh, and "*It is recommended that these recommendations are included in the amendment of the CAIP due in 2020.*" The review gives a detailed account of under-investment, under-funding and under-staffing.

Instead of post-austerity mode, we are now in a post-pandemic recovery plan mode. We are also in a climate emergency planning mode. Countryside access takes on a new importance and, while much of the Public Right of Way network may stay mainly for leisure, health and wellbeing uses, these are vital in themselves. Some rights-of-way may become important links in active travel and "blue and green infrastructure" networks, and require investment.

- Strategic Planning should liaise with Wiltshire's Rights of Way and Countryside Service to procure the overdue refresh of the CAIP, and incorporate this into the new Local Plan with appropriate policies, so that development contributes to enhancing this vital built and natural capital asset.

### **Green and Blue Infrastructure Strategy**

References to the "emerging" Green and Blue Infrastructure Strategy ('GBIS') appear to be incorrect, since the term 'emerging' applies to strategies etc. published in draft form. There are piecemeal references and excerpts distributed through the Local Plan Review documents, in particular illustrative maps in the area plans. Green infrastructure has been described as a multifunctional network, with bodies of water adding the 'blue' element.

This is welcomed as a positive and necessary element of a carbon-neutral-2030 Local Plan. It is unclear, though, which corridors and tracts in the network will accommodate active travel (walking and cycling) links – and it is vital that they do, given the new urgency of modal shift.

- The GBIS should be published for consultation, and form an integral part of the Local Plan Review proposals. The place of active travel should be central to the GBIS, with demanding targets for its support for these. Corridors should be added to the GBIS along all Wiltshire's active, disused and planned canals, and its live and disused railway lines. It should show how GBIS network links in the town-based plans connect into and through the surrounding rural areas.

### **Comments on the Wiltshire Local Plan Transport Review**

The Atkins document "Wiltshire Local Plan, Transport Review January 2021" ('WLPTR') is regrettably not an LTP, but just an item of transport planning support using Wiltshire's strategic transport model. However, it uses standardised national assumptions on trip

generation and traffic growth. It acknowledges the uncertainty introduced by the COVID-19 pandemic, lockdowns and changes, but not the possibility of proactive “build back better” policies influencing travel habits and the mix of modes. It ignores the very likely onset of proactive transport policy changes resulting from Wiltshire’s ‘Climate Emergency’ target.

➤ **Introduction (section 1)**

There have been changes in working and shopping habits resulting from the COVID-19 pandemic, some of which may endure. It would therefore be unwise to base future travel demand on 2018 traffic conditions.

➤ **Assessing the impacts of local plan growth (section 2)**

There has been insufficient modelling and analysis to accurately assess the full impacts in respect of transport. For instance, Site 1 in Chippenham is a proposed development which it is acknowledged would “be likely to generate one-way traffic flow that exceeds 1,800 vehicles per hour” [LPR Sustainability Appraisal, Annex II, p.12]. While it is admitted that this will have a ‘moderate (significant) adverse effect’ this transport impact has not been taken into account in objective SA 5 (Minimise our impacts on climate change). There is no reference to the carbon generation from increased traffic, despite the evidence which shows that transport in Wiltshire is responsible for 40% of emissions. By disregarding the carbon generated by its transport impacts the site is then deemed to have only a ‘minor adverse effect’ in respect of SA 5.

➤ **Highway improvements**

As a result of the large inherent uncertainties in the emerging post-pandemic situation and the current Wiltshire climate emergency, the assessments in the WLPTR have a high level of spurious accuracy. It is regrettable that there is no sensitivity analysis to test variations to the assumptions.

The mapped indications of near-capacity and over-capacity road links have a value as indicators of locations where modal shift via active travel and public transport may need to be priorities.

Estimates are available from nearby and comparable public authorities that have made similar commitments to become carbon neutral by 2030. Even those that have committed to a 2050 date have provided 2030 or 2035 interim targets for transport emissions and details of the measures needed to achieve these.

Bath and North East Somerset excluding Bath has a population density of 324 per sq. km, compared with Wiltshire’s 207 per sq. km including the large unpopulated Salisbury Plain. The September 2019 “B&NES Climate Emergency Study Discussion Pack” shows these requirements for reducing transport emissions, using the ‘SCATTER Stretch’ criteria:

**“Distance reduction:** 25% reduction in passenger-km per person per year.

**Significant modal shifts:** 7% Reduction in car travel.

**Shift to zero carbon cars:** 76% EV, 14% PHEV, 10% Petrol/Diesel. [etc.]”

The April 2019 Bristol study, “City of Bristol Carbon Neutrality” scenario for “net zero” has:

**“Population and journey growth:** Radical steps to reduce vehicle numbers and usage by 25% including mass uptake of public and other mobility solutions.”

There is no available evidence that Wiltshire’s 2030 carbon neutral requirements for transport emissions reduction will be substantially different from these. Rural areas currently

have relatively high car dependency compared with large cities. It is already clear from studies done outside Wiltshire.

The Local Plan should not base any of its spatial strategy or policies on assuming that highway upgrades such as bypasses and the duelling of sections of the A350 will in fact take place. It should not base its transport assumptions on the ten-year-old LTP3. Routes for such highways should no longer be safeguarded. In the transition from the pandemic emergency to directly and fully addressing the climate and biodiversity emergencies, there should be a moratorium on these schemes.

➤ **EV charging infrastructure**

A mass shift to EV ownership for private cars and light commercial and good vehicles is anticipated and is to be welcomed.

The Local Plan should give details and include policies requiring urgent development of EV charging infrastructure across the county.

However, it needs to recognise that this mass shift will take place too late to bear the main burden of carbon reduction from the transport sector. New petrol and diesel cars will be available until 2030, and hybrids after that. A significant proportion of Wiltshire's driving population buys used cars, at various price points. Measures to reduce car travel overall are of comparable importance.

➤ **Mitigating impacts of Local Plan Growth (section 3)**

Despite the assertion (3.1 and Appendix A, Table A-2) that active travel has the highest priority, with public transport medium and highways measures the lowest, the strategy proposes spending £31.7 million on walking and cycling, £10.5 million on public transport and £347.6 million on highways schemes. This is 'predict and provide' – the discredited philosophy of the last century – on a grand scale. It is also a fallacy to assume that the conversion to 'clean' fuels for transport will enable legally binding decarbonisation targets to be met. Those bodies that have done detailed investigations into this area have found that mitigation will need to include significant changes in transport patterns and in assumptions about private car use. For instance:

House of Commons Science and Technology Committee "Clean Growth: Technologies for meeting the UK's emissions reduction targets" [HC 1454] (August 2019):

*"The Government's current long-term targets for decarbonising transport focus heavily on reducing exhaust emissions and increasing sales of low-emissions vehicles, rather than delivering a low-emissions transport system. In the long-term, widespread personal vehicle ownership does not appear to be compatible with significant decarbonisation. The Government should not aim to achieve emissions reductions simply by replacing existing vehicles with lower-emission versions. Alongside the Government's existing targets and policies, it must develop a strategy to stimulate a low-emissions transport system, with the metrics and targets to match. This should aim to reduce the number of vehicles required, for example by: promoting and improving public transport; reducing its cost relative to private transport; encouraging vehicle usership in place of ownership; and encouraging and supporting increased levels of walking and cycling. The Government should commit to ensuring that the annual increase in fuel duty should never be lower than the average increase in rail or bus fares." (Paragraph 131)*

Committee on Climate Change "Policies for the Sixth Carbon Budget and Net Zero" (December 2020):

In Box 2.2 of this document (p.66) there is a summary of the role of Local Authorities in local transport policies. Some of these are shown below: Wiltshire's Transport Review needs to consider these points and incorporate them into the mitigation measures which are being proposed.

*“**Planning policy** can steer spatial and local planning that favours housing and commercial developments in the right places to reduce traffic and support efficient logistics.*

***Investment in walking and cycling networks** and development of Local Plans and Transport Plans to deliver modal shift from cars to active and public transport. These can also identify locations for consolidation centres near road links and urban micro-consolidation centres.*

*Introduction of **low-emissions zones** that set minimum standards for carbon and other emissions.*

*Planning and support for installation of **EV charging networks** across their jurisdictions.*

*They can use **parking powers** under Traffic Regulation Orders to repurpose parking spaces for car clubs, cycle parking and EV charge points and use parking charges to discourage private car use and promote public transport...*

*•LAs can **work jointly with bus operators** to provide a bus network that is rapid, reliable and affordable (e.g. through a bus strategy and bus quality partnership) ...”*

When Wiltshire Council declared a Climate Emergency in February 2019 they resolved to implement best practice methods to limit Global Warming to less than 1.5°C. There is little evidence of best practice being considered in this Transport Review, and a far more radical approach will be needed to ensure that transport emissions in Wiltshire contribute to the 'carbon neutral by 2030' target adopted by the Council.

### ➤ **Walking and cycling measures (3.2)**

Reference should be made to the Local Cycling and Walking Infrastructure Plan (LCWIP) which (presumably) is being prepared to detail the exact plans for improving walking and cycling infrastructure. Improvements to walking and cycling will need to cover all the settlements in Wiltshire, and links between the settlements, not just links within the 3 principal settlements.

It is unclear which schemes are being included in the proposals. There needs to be a breakdown of what is proposed across the principal settlements for the £31.69 million total given in Table G.1.

There is new cycle infrastructure for the three principal settlements shown on Figures 3-1 through 3-3, including 'on-carriageway cycle lanes' and 'segregated two-way cycle track'. A number of questions arise in respect of these maps:

- Detailed design should continue for these schemes.
- The LCWIP should identify the road space to construct these schemes to DfT's LTN 1/20 Cycling Infrastructure Design standards, or a locally appropriate interpretation.
- It should be clarified whether the cost of all of these schemes included in the costs given in Appendix G.

In paragraph 3.2.1 there is reference to providing “safe, well-signed routes to railway stations from across the three principal settlements of Chippenham, Trowbridge and Salisbury”. As well as this, consideration needs to be given to other routes to serve employment sites, schools, shops, town centres and other amenities.

### ➤ **Rail Strategy (3.3.2)**

Access to existing stations is important, but the Transport Review should also give consideration to further rail improvements. This very limited section on the rail strategy needs to be considerably expanded.

Twenty years ago, Wiltshire County Council's Local Transport Plan suggested 'Priority' new stations at Wootton Bassett, Corsham and Wilton as well as 'Possible' new stations at Lacock, Holt, Staverton, White Horse, Codford, Wylde, Dinton, Porton and Alderbury. (WCC LTP1, Fig 3.6.6).

The more recent SWLEP Rail Strategy Report's recommendations for new stations in Wiltshire included Corsham, Devizes Parkway, Porton & Wilton (the latter being subject to results of study on Porton). (see SWLEP [Rail Strategy Main Report](#), July 2019)

As a minimum, the Local Transport Review needs to reflect the aspirations – which Wiltshire Council presumably supported - in the 2019 SWLEP Rail Strategy.

### ➤ **Bus Strategy (3.3.3/3.3.4)**

This section should be expanded to include reference to Salisbury, in particular how routes can be extended/improved to serve the expanding settlement. It would be appropriate to refer to the role which Park & Ride sites, and associated bus services, might be able to contribute to modal shift.

The consideration of 'Dynamic Demand Responsive Transport' (DDRT) is welcome, this is one of the options which could be particularly suitable for some of Wiltshire's scattered rural communities. Across Wiltshire there are households which do not have access to a car, and public transport must be maintained and enhanced across Wiltshire.

### ➤ **Missing section: 'Mobility as a Service' (MaaS).**

'MaaS', or Mobility as a Service refers to the integration of various forms of transport services into a single mobility service accessible on demand.

When responding to a questionnaire sent to local authorities who are members of the Western Gateway Sub-national Transport Body in 2020 Wiltshire Council's response to the question "*How much are you thinking about Future Mobility e.g. Mobility as a Service (MaaS), connected vehicles, Active travel measures within your local area?*" included the reply that "*Wiltshire's priorities are currently set out to maximise economic growth in those large towns where it can be accommodated more sustainably and where MaaS, Active Travel and commercial frequent public transport can be supported.*" (see December 2020 [Agenda and Supporting Papers](#), WGSTB-Partnership-Board-Combined-Papers\_Dec-16-2020-3.pdf).

Given the statement that MaaS can be supported there should be to a section to cover the possibilities. This might include reference to existing Car Clubs across Wiltshire – such as Co-Cars in Salisbury – and consideration as to how these could be expanded both in larger and in smaller settlements. Various models for shared mobility – including Car Clubs, Bike share and Mobility hubs - are covered at [CoMoUK](#)'s website.

## **C2 Parking policy recommendations**

This appendix reports that there was a recommendation from Atkins in 2018 that there should be a review of car parking processes, that a data bank should be built up and that this should help to inform the car parking strategy across Wiltshire. Furthermore "*Once these next steps have been implemented and a good understanding of the parking situation within*

*each principal settlement has been developed, a robust parking policy that aids in the reduction of car trips into the principal settlement and market town centres can be established. It is recommended that these parking policies are used to help manage traffic demand and to mitigate the impacts of growth in each town.”*

It is important to undertake this step because not only is a reduction in car parking spaces, and a modal shift from the motor car, needed to cut carbon and congestion, but there is also the possibility that some town centre car parks could be developed as brownfield sites. For example, in Salisbury this has been proposed (in the Salisbury Central Area framework) for car parks at Salt Lane, Brown Street and part of Central car park.

Therefore, this review is needed as a fundamental pre-requisite to the Local Plan Review.

### **Missing section: Residential car parking strategy**

The net zero transport report from RTPI referred to above gives some guidelines regarding how a modal shift from the private car can be achieved – for example (p.41) *“Car ownership is discouraged through the design of the public realm and the ‘decoupling’ of private parking from new home sales. Active and public transport are increasingly the most convenient, affordable and desirable option for travel outside the neighbourhood, with shared car clubs and demand responsive transport providing for journeys where active and public transport are not an option.”*

A radical shift is needed from Wiltshire Council’s current ‘minimum’ parking standards, such as the following:

- A policy or SPD to reduce parking spaces allocated to residential development. It is suggested that a ‘Zonal’ approach be developed, see for example the [SPD recently adopted \(5/1/2021\) in Bournemouth & Poole](#).
- Discouraging car ownership through the design of the public realm and the ‘decoupling’ of private parking from new homes sales. Parking spaces for private vehicles in new development could be made available on a leasehold basis, located at least 5 minutes’ walk from most dwellings.
- Parking for car share vehicles, and stops for public transport (which may be demand responsive) would be more conveniently located than parking for privately owned vehicles.

The Local Plan should set maximum parking standards instead of minimum, complementing the allocation of new housing to sites with lower car dependency. As Campaign for Better Transport stated in their [2014 consultation response](#):

*“There is strong evidence of the effectiveness of maximum parking standards, in reducing congestion and traffic ... “There is much evidence of the benefits of maintaining maximum parking standards. In many areas, including but not restricted to large cities, parking policies are a valuable way of ensuring the best use is made of land and that new housing does not contribute to local congestion. Across the country, traffic levels have not grown over the past decade, and in London they have fallen, partly due to the 40-year history of setting clear maximum parking standards across the city. London’s economy and the health of its local town centres have not suffered from these measures – in contrast, the evidence is that by promoting higher density development, and encouraging businesses to locate near public transport hubs, there is greater efficiency and less of the ‘hollowing out’ seen in other towns and cities.”*

The Local Plan should incorporate car-free housing. There is a heritage of homes without private or nearby on-street parking, such as terraces in towns such as Bradford on Avon and

many others. But there is a severe shortage of modern car-free or low-car housing developments even in Wiltshire's principal settlements and market towns. It is open to the Planning Authority to require developers to make housing car-free by design and through restrictive covenants. This measure will significantly reduce the carbon impact of new houses and the carbon budget of their occupiers. Car-free Housing should incorporate secure bicycle storage including conventional power sockets for charging e-bikes. Another advantage is that land area is not taken up by garages, driveways, turning areas etc. This means that a higher density is achievable for a given land-take. In turn, the total housing requirement for the county can be met with fewer and/or smaller sites. Naturally it implies that such housing sites will be in or near the centres of towns, close to shops, etc. and preferably close to main public transport facilities. A quota of at least one third of all new housing being Car-free is achievable and this, or a specific fraction to be determined, should be included in the Local Plan, both as a headline figure and as site-specific proportions.

### **E-bikes – an emerging new transport mode**

With new battery technologies and developments in the bicycle market, there has been sustained and explosive growth in sales of electrically assisted pedal cycles – e-bikes – in the EU and in Britain. The major part of cycle sales by value, and in many cases the majority by quantity, are e-bikes. This is in spite of supply shortages due to worldwide demand, tariff barriers on China and Brexit complications. Most cycle retailers in Wiltshire stocking e-bikes report customer waiting lists running into the 50s to 100s, and many months long. They are experiencing severe stock problems, and having to order ahead into 2022 or even later.

Under UK rules, most e-bikes count as pedal cycles (exempt from license, etc., and limited to motor assistance under 15mph). Members of the public are using them in new ways, and in particular are engaging actively in modal shift for journeys of five, ten miles and often far longer. Speeds near to 15mph are easily maintained. A 5 to 7-mile commute can be achieved in half an hour. The often underestimate time overhead of accessing and waling to/from parking places is reduced with cycling and e-biking.

- The contribution of e-bikes to carbon neutrality should be reflected in the Local Plan. The transport model used in the WLPTR should be revised to reflect scenarios for uptake and use of e-bikes. The Local Plan should include e-bike promotion policies, just as it should for EVs. The role of cargo e-bikes in substituting for “white van” deliveries should be included.

### **Conclusions**

- Wiltshire's 2030 net zero target needs to govern the Local Plan;
- Rising transport emissions need to reduce to a fraction of their current level to meet or get close to the target;
- The Transport Review supports housing locations with dependency on car travel;
- Wiltshire Council's current Local Transport Plan is not fit for purpose and will not help achieve the net zero target;
- The next Local Transport Plan needs to take a radical new approach including promoting modal shift;
- The Local Plan should work with the Local Transport Plan to promote rail, bus and MaaS strategies that will help reduce emissions in the longer-term;
- Local Plan parking policies should be reformed, including 'maximum' standards;
- Local Plan policies should drive investment in active travel, e-bikes/ scooters and EV charging infrastructure.

## 6. FLOOD RISK

### Introduction

To enable proper spatial planning, all planning for future development should be holistic, to avoid inadvertently increasing flood potential downstream of a development, be it housing or other infrastructure. Planning for the whole flood catchment area must be considered.

Creation of new developments will inevitably mean more runoff that, if not properly managed locally through proper SuDS installation in new developments and retrofitting to existing, will create downstream impacts. For example, a 1,000 house development on a greenfield site will typically create 8ha of new impermeable area. Without properly designed SuDS attenuation, downstream flooding risk will be significantly increased.

### Comments on the JBA statement on flood risk process:

The statement says: *“The cumulative impact should be considered throughout the planning process, **from the allocation of sites within the Local Plan**, to the planning application and development design stages.*

***Once preferred options are identified, their cumulative impact can be considered in more detail within a Level 2 SFRA, where necessary.***

*In addition, site-specific FRAs must consider **the cumulative impact of the proposed development on flood risk within the wider catchment area**. In consultation with the Environment Agency, conditions set by the Council should support the implementation of SuDS and appropriate flood mitigation measures.*

*As a minimum, development should have a neutral impact on flood risk, and where possible it should improve existing issues, to ensure that flood risk is not exacerbated either within, or outside of, the Council's administrative area”.*

By way of example, albeit at high level: the Chippenham proposed development area gives scale to the problem in an area already suffering from frequent flooding and has a major impact on flood frequency, both directly and downstream. There could be in excess of 600ha of development land all on or adjacent to flood zone 2 land.

If we assume, conservatively, that the hard development takes 1/3 of the land, then we have 200ha of impermeable area. A typical storm run-off assuming 25mm in 3 hours is 50,000m<sup>3</sup> entering the flood plain area in that time. Even with SuDS installed, there will be a significant inflow to the river which will impact Melksham and Bradford upon Avon.

All are cumulative. And if you follow the Avon from Malmesbury (and Brinksworth Brook from Wotton Bassett) to Chippenham, then through to Bradford upon Avon there are over 1,000ha of land potentially allocated for housing in or on adjacent to flood zone 2 areas, all with their associated runoff. This will impact areas further downstream out of the County. These cumulative impacts must be taken into account.

At present the draft Local Plan does not seem to take any of this into account and references to the SFPA are limited, if not non-existent. In summary, development in all of these areas specifically from increased flood risk is at the least, imprudent and demands proper study of flood risks.

## **Comments on the JBA Consulting Level 1 Flood Risk Assessment report (May 2019): Impacts of Climate Change**

Climate change is developing faster than expected (UKCP20)<sup>2</sup> implying that current strategic flood risk assessments need to be treated with caution. JBA recommend they are revisited on a regular basis, at least annually. However, a significant number of the studies used in their analysis are out of date, some by as much as 10 years.

As a minimum this makes the whole report on flood risk inadequate, and potentially dangerous to use as a management tool for Plan development.

### **2.3.1 Bristol Avon CFMP**

An example is Bristol Avon (2011)<sup>3</sup> This should be updated annually. JBA use 2010 figures which estimates 20,000 properties at risk of flooding in the Bristol Avon catchment.

Climate Change impacts are going to be significantly greater than those forecast at that date, and along with the increase in housing in the catchment since that date, suggests that the at risk figure will be much higher.

This even before the proposed developments in the Local Plan proposals.

### **2.7 Wiltshire LFRMS<sup>4</sup>**

This is out of date (2015) and overdue for renewal. Wiltshire Council cannot proceed with this out of date information and with the concerns of flooding land, particularly along the Avon.

### **2.8.2 Cumulative Flood Risk**

Wiltshire Council must take into account the cumulative impact on flood risk. As described above, the impact of storm conditions will be significant and make a large number of the sites proposed in the Local Plan unviable and, if implemented, make downstream areas more prone to flooding.

### **2.8 Surface water management plan (SWMPs)**

According to the, very out of date, 2011 Wiltshire Council SWMP report there were 18,000<sup>5</sup> properties at risk in Wiltshire. Of those ranked in the top 10, over 4,400 were in the Avon-Bristol catchment. Adding another 9,000 makes no sense whatsoever.

### **2.13 National Infrastructure Assessment**

Directly from the JBA report *“Flood resilient design should allow for climate change up to 2°C in global temperatures, with the ability to be adapted to provide resilience up to a 4°C rise.”*

AND *“Updated catchment flood management plans and shoreline management plans by 2023.”*

In other words, prudent Councils will be designing for 4°C warming and delivering their revised flood management plans by 2023. Development of the Local Plan must take this into account, otherwise it will need to be rewritten immediately the flood resilience report is released.

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<sup>2</sup> Murphy JM, Brown S and Fung F (2020). UKCP Factsheet: Probabilistic Projections of Climate Extremes. Met Office, Exeter

<sup>3</sup> Bristol Avon: Catchment Flood Management Plan, Environment Agency (2012). Accessed online at: <https://www.gov.uk/government/publications/bristol-avon-catchment-flood-management-plan>

<sup>4</sup> 25 Local Flood Risk Management Strategy, Wiltshire Council (2015). Accessed online at: <http://www.wiltshire.gov.uk/downloads/4287> on: 06/07/2018

<sup>5</sup> This figure is in conflict with that given at 2.3.1 of 20,000

## **Flood Risk Assessment**

### **3.3.4 Climate Change (Flood Zone 3a (1 in 100-year event) plus climate change))**

From the JBA report *“The Flood Map supplied by the Environment Agency does not provide any allowance or indication of the impact of climate change on the Flood Zones. Updated government guidance on assessing the impact of climate change on flooding in line with the UKCP09 Climate Change Projections was released in February 2016.”*

The section concludes with a statement that *“The key allowances to consider for Flood Zone 3a are therefore the higher central and upper end (for example, 35% and 70% in the Thames river basin respectively) as shown in Table 3-2.”*

Note: even this has now been superseded by the UKCP 2020 report reference<sup>1</sup>. These are the percentage increases in flows. To add to this with ill-conceived housing developments, and put more households at risk of flooding, makes no sense whatsoever.

### **2.15 Sewers for adaption**

It is noted at the river Avon flow will increase by 20% between 2020-2039.

## **Conclusions**

- The document produced by JBA contains a great deal of out-of-date data and also fails in some instances to recognise the large increase in flooding in the catchments over the past 10 years. To rely on any of its conclusions regarding flood risk would be unwise;
- The flood risk to the whole county of Wiltshire will increase significantly over the coming 15 years;
- The risk to the various catchments in Wiltshire being inundated through changes in the climate is high, with as much as 70% increase in peak flows (2018 data) without any additional urban run-off;
- There are already somewhere in excess of 20,000 homes at risk of flooding in Wiltshire. Adding to that number by ill-conceived development will create a major burden on the Local Authority who have the responsibility as Lead Local Flood Authority to manage flood risks and the outcomes of flooding;
- The proposed Local Plan addition of over 1,000ha of urban landscape in or adjacent to flood zone 2 areas is, to say the least, unwise;
- The LLFA also has a responsibility to its neighbours to manage flood flows. It should take that responsibility seriously.

## 7. CLIMATE REPORT CARD ON THE WILTSHIRE LOCAL PLAN REVIEW

### Introduction

On 2<sup>nd</sup> September 2019 the environmental law charity, [Client Earth](#) wrote to Wiltshire Council inviting them to, 'put your area on a credible path to achieving net zero emissions by setting robust carbon reduction targets and integrating them throughout your Local Plan.' Client Earth further emphasised that this is a legal requirement and that taking action in this way would bring, 'substantial benefits and opportunities to your communities.' The letter went on to outline the relevant environmental and planning legislation that require Local Plans to, 'contribute proactively to meeting national and international climate commitments.'

Wiltshire Council is undertaking a consultation to inform the preparation of the Wiltshire Local Plan Review from Wednesday 13<sup>th</sup> January to Tuesday 9<sup>th</sup> March 2021, and is seeking representations. This 'Report Card' constitutes one such representation and has been prepared by the Sustainable Development Topic Group of [Wiltshire Climate Alliance](#) (WCA). WCA is an umbrella organisation for Wiltshire based groups to come together to campaign for action on climate change.

### Purpose of the Report Card

The Report Card that follows in this document uses the criteria identified by Client Earth to assess to what extent the Local Plan contributes proactively to meeting local, national and international climate commitments. Set out below are the criteria against which the Local Plan is assessed, derived from key elements of relevant planning and environmental legislation, and local targets:

#### **CRITERION 1: To what extent does this section of the Local Plan contribute to radical reductions in greenhouse gas emissions?**

- ▶ Section 19(1A) of the Planning and Compulsory Purchase Act 2004 (PCPA) requires that a local authority's development plan documents must, '(taken as a whole) include policies designed to secure that the development and use of land in the local planning authority's area contribute to the mitigation of, and adaptation to, climate change.' It is only by setting local carbon reduction targets by reference to wider national and international targets - and demonstrating proposed policies' consistency with local targets - that it is possible to establish and track an area's contribution to the mitigation of climate change (and for policies to be 'designed to secure' that local land use and development mitigates climate change). In this sense, section 19(1A) makes emissions reduction a central organising principle of plan-making.
- ▶ The updated National Planning Policy Framework (NPPF) maintains the requirement that, 'the planning system should support the transition to a low carbon future in a changing climate.' In particular: '[i]t should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions ... Plans should take a proactive approach to mitigating and adapting to climate change ... [i]n line with the objectives and provisions of the Climate Change Act 2008.
- ▶ The Government emphasises the importance of local planning policy in delivering compliance with the UK's carbon budgets in its Clean Growth Strategy, 'Local areas are best placed to drive emission reductions through their unique position of managing policy on land, buildings, water, waste and transport. They can embed low carbon measures in strategic plans across areas such as health and social care, transport and housing.'

**CRITERION 2: To what extent does this section of the Local Plan exhibit a robust evaluation of future emissions? Does it consider different emission sources? Has sustainability appraisal been used to test different spatial options on emissions?**

- ▶ The national Planning Practice Guidance (PPG) refers to addressing climate change as, ‘one of the core land use planning principles’ that should, ‘underpin both plan-making and decision-taking.’ The PPG also refers to the need for local planning authorities to undertake a, ‘robust evaluation of future emissions’, including consideration of, ‘different emission sources, likely trends taking into account requirements set in national legislation, and a range of development scenarios.’ It also states that, ‘sustainability appraisal should be used to test different spatial options in plans on emissions.’

**CRITERION 3: To what extent has this section of the Local Plan been assessed for consistency with all relevant climate objectives and targets?**

- ▶ The Environmental Assessment of Plans and Programmes Regulations 2004 (which implement the Strategic Environmental Assessment (SEA) Directive) require that a development plan document’s cumulative climate impacts are assessed and taken into account. Among other things, this includes assessing the consistency of proposed policies with all relevant climate objectives and targets.

**CRITERION 4: Where relevant, to what extent has Wiltshire Council cooperated with other local planning authorities in planning measures to address climate change mitigation, where there are cross border impacts?**

- ▶ Under section 33A of the PCPA, local planning authorities are under a duty to cooperate with other local planning authorities in preparing Local Plans where strategic matters - such as, ‘planning measures to address climate change mitigation’ - have impacts across administrative boundaries.

**CRITERION 5: Does this section of the Local Plan include emissions reduction targets and indicators that support local and national commitments? Does this section of the Local Plan set out how these indicators and targets will be monitored annually?**

- ▶ Monitoring obligations require local planning authorities to report on an annual basis against any targets or indicators included in Local Plans. Local Plan policies should be designed to secure emissions reductions that are at least consistent with the UK’s national and international commitments (currently 68% reduction by 2030 and net zero by 2050). Additionally, Wiltshire Council has acknowledged the climate emergency and seeks to make the county of Wiltshire carbon neutral by 2030, and has stated that carbon reduction will be a key theme in the council’s recovery from COVID-19.

	1: RADICAL REDUCTIONS IN GHGs?	2: EVALUATION OF FUTURE EMISSIONS/ SUSTAINABILITY APPRAISAL?	3: CONSISTENT WITH CLIMATE OBJECTIVES AND TARGETS?	4: COOPERATION WITH NEIGHBOURING AUTHORITIES?	5: EMISSIONS REDUCTION TARGETS TO SUPPORT COMMIT-MENTS? ANNUAL MONITORING?
<b>EMERGING SPATIAL STRATEGY</b>	<p>The strategy states that carbon reduction is 'already an integral theme of the Local Plan'. This is not borne out by the strategy, where there is no mention of GHG emissions reduction targets, or a strategic/ policy approach to achieve them.</p>	<p>The strategy references the interim sustainability appraisal (SA) and states that the emerging spatial strategy has been informed by this process. However, if there are evaluations of future emissions in the SA, these are not mentioned in the strategy. The elements of the SA that are referenced within the strategy only talk about the assessment of the alternative development strategies considered, rather than looking in detail at emissions. The strategy acknowledges that further SA will be needed but does not specify that this will look at GHG emissions reduction measures. It may also then be too late to radically change the spatial strategy, which is what is needed.</p>	<p>Whilst the strategy mentions the Wiltshire Council acknowledgement of the Climate Emergency, there is no baseline carbon impact, carbon reduction framework or specific reduction targets set out within the strategy that map the pathway to achieve the climate objectives.</p> <p>Without these, it is impossible to know the Local Plan's likely impact, assess the options within it and develop a Plan that will contribute to national and Wiltshire carbon reduction goals.</p>	<p>The strategy states that the Council works closely with Swindon Borough Council in relation to the Swindon HMA. There are no mentions of specific planning measures to address climate change mitigation, just a vague reference to a reduction in the need to travel (which the spatial strategy for Wiltshire fails to achieve) if both authorities meet their own housing targets.</p>	<p>The strategy contains no information on emissions reduction targets to support either national targets (as articulated in the 6th Carbon Budget) or Wiltshire Council's net zero by 2030 commitments. There is a Climate Change Outcomes section for each HMA within the strategy, however these currently fail to set out how the climate change outcomes sought would be delivered.</p>

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<b>EMPOWERING RURAL COMMUNITIES</b>	There is no mention of climate change, emissions reduction targets or the net zero commitment anywhere in this section of the Local Plan.	There is no mention of climate change, emissions reduction targets or the net zero commitment anywhere in this section of the Local Plan.	There is no mention of climate change, emissions reduction targets or the net zero commitment anywhere in this section of the Local Plan.	There is no mention of climate change, emissions reduction targets or the net zero commitment anywhere in this section of the Local Plan.	There is no mention of climate change, emissions reduction targets or the net zero commitment anywhere in this section of the Local Plan.
<b>ADDRESSING CLIMATE CHANGE AND BIODIVERSITY NET GAIN</b>	This section of the Local Plan correctly identifies, using the reference to the response to Covid-19, that urgent action to tackle emergencies is possible. It also acknowledges that it is important not to lose sight of plans to tackle the ongoing threat of climate change. It states that the Council is preparing strategies aimed at delivering synergistic step-changes towards tackling climate change. It notes that dramatically reducing the amount of carbon released in Wiltshire needs to focus on emissions from cars and the energy used to heat and power homes and	This section correctly identifies that policies in recent decades have 'potentially' not gone far enough to adapt to and mitigate the acknowledged effects of climate change. In reality, there is no 'potentially' here. Key policy decisions, such as the jettisoning of the proposed zero carbon homes regulations due to enter force in 2016, by the Conservative Government, illustrate the point, and the problems this has caused Local Authorities when trying to do the right thing in terms of sustainable design and construction are acknowledged in this	The section emphasises that climate change adaptation and mitigation strategies must be woven into a number of planning policy areas and act as a 'golden thread' through the Local Plan. This is not yet evident. There is no specific linkage through the plan and its discussion of new homes, with mitigation or adaptation strategies. This MUST be addressed if the Local Plan is to have a positive rather than a negative impact on emissions reductions and the achievement of net zero targets.  Section 4 notes that assessment is now required to understand the extent to which	The section indicates that cooperation with neighbouring authorities is being considered, and could be important in supporting efforts to decarbonise at a strategic scale. However, it does not indicate that any such cooperation has actually started yet.	The section sets out in broad terms the areas that need addressing in order to achieve net zero (section 3), however, these measures have not translated across to the other parts of the plan - there is an almost complete disconnect between the climate change section and the rest of the Local Plan.  The section appears to indicate that Wiltshire has not yet identified a carbon baseline. It acknowledges that this is the necessary first step for a carbon budget for the county to be set, against which progress can be measured.

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	<p>businesses. Considering we are in a climate and ecological emergency, it is very disappointing that any meaningful action on achieving radical GHG emissions reductions is being pushed back until after a more detailed policy response to climate change is developed, following this consultation on the Local Plan.</p> <p>Decarbonisation targets have not yet been set because a carbon baseline and budget have not yet been calculated.</p> <p>It is encouraging to see that this section acknowledges some of the key issues that must be factored into any decision-making about the location and form of any new development, e.g. the need for big changes to travel patterns to significantly reduce carbon</p>	<p>section of the plan. We argue that this does not preclude the Council from insisting on future development conforming to standards that are in line with their emissions reduction targets.</p> <p>The problems are identified - tackling unsustainable travel patterns/modes and decarbonising existing and future building stock. It also understands the important role of the Local Plan in influencing the achievement of these goals by shaping the pattern and form of future development, supporting the delivery of renewable energy schemes, encouraging investment in the green economy and influencing the shift to sustainable modes of transport. However, this has not yet translated across to the rest of the Local Plan, which in its current form works against the radical</p>	<p>current policies contribute to tackling climate change, and where the gaps are. It states that this assessment will support the scope for updating policy, developing new policies or whether a whole new climate change objective is required. This is an URGENT piece of work, and would seem to be fundamental to the decision-making about any future development, and whether or how it can proceed.</p> <p>This section also illuminates the challenge of being behind the curve when it comes to the inevitable changes in the energy market, noting that developments could be potentially unviable as the existing infrastructure may well be incapable of meeting projected demand. This is an alarm call from within the Local Plan documentation</p>		<p>It is disappointing that despite acknowledging we are in a climate emergency, 2 whole years on from then, the Council still hasn't even established a carbon baseline.</p> <p>This section of the plan (section 4) acknowledges that an adequate monitoring framework will be important to ensure effectiveness of policy, and that the current issue of a lack of a carbon baseline and time-series data on sector emissions is hampering efforts at understanding the scale of the challenge. This MUST be addressed as a matter of urgency, before any decisions are made that will make the task even harder to achieve.</p>

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	<p>emissions. And that this section highlights that sustainable development means increasing self-containment within settlements, aligning job creation with housing, reducing the need to travel, supporting modal shift and using greener vehicle technology.</p> <p>However, the spatial strategy fails to address all the aims and objectives alluded to in the Climate Change and Biodiversity section and seems set to work in the opposite direction.</p>	<p>decarbonisation necessary to achieve the targets.</p> <p>Section 4 also acknowledges that current policies potentially do not incorporate the opportunities to enhance green/blue infrastructure and biodiversity, and that the co-benefits of GBI in terms of carbon sequestration, air quality improvements, passive cooling, health and wellbeing and biodiversity enhancement need to be explored. Again, a clear translation of these ambitions does not yet appear in other parts of the Local Plan, and this omission must be addressed.</p>	<p>itself, the implications of which need to be urgently addressed prior to any new developments being approved. This supports the absolute need for any new developments to be constructed so as to minimise energy demand and maximise energy efficiency and on-site renewable generation.</p>		

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<p><b>SUPPORTING DOCUMENTS (INCLUDING SUSTAINABILITY APPRAISAL AND HABITATS REGULATIONS ASSESSMENT)</b></p>	<p>We consider it to be a glaring omission that the Interim SA does not even mention emissions reductions in its recommendations and mitigation measures sections. If either the net zero target by 2030, or the 6th Carbon Budget targets are to be met, radical emissions reduction needs to be the central plank of the Local Plan. There is no evidence here to support the assertion that carbon reduction is an integral theme of the Local Plan.</p> <p>If the Council is to have any prospect of achieving the GHG emissions reductions that are now required by law, our view is that this Local Plan requires a radical rethink to align it with the markedly changed priorities that are now extant in relation to the urgent need to address</p>	<p>The Interim SA references a July 2020 Scoping Report, which doesn't appear to be available to people wishing to respond to this consultation. Particularly because it would be useful to see how the Climate Emergency acknowledgement and net zero commitment have been incorporated into the sustainability issues and problems that the SA seeks to identify. Furthermore, it would be helpful to see any baseline data around carbon emissions in the county, that may be set out in the updated Scoping Report (although it may be that there is no baseline data there, in which case this is an omission that should be rectified).</p> <p>In the light of the net zero target, GHG emissions should be highlighted as a key sustainability issue and priority for</p>	<p>It is noted that Wiltshire Council produced an updated draft Scoping Report for consultation in order to take account of the Climate Emergency acknowledged by WC in Feb 2019 and the commitment to seek to make the county carbon neutral by 2030. The Interim SA references a July 2020 Scoping Report and a final September 2020 version of the Scoping Report, however neither of these appear to be in the supporting documents available through the consultation section of the website, and the old Feb 2019 Scoping Report is still the one linked to. This is unfortunate, because it would be useful to be able to scrutinise the methodology used to see whether it does in fact incorporate the implications of the commitment to achieve</p>		<p>The Interim SA appendices set out the detailed assessment of impacts of the various development options. SA Objective 5 - 'Minimise impacts on climate change (mitigation) and reduce vulnerability to future climate change effects (adaptation)' relates specifically to the focus of this response to the consultation. We do not believe that SA Objective 5 sufficiently accounts for the urgency with which GHG emissions must be reduced in order for the county to achieve net zero by 2030, or even achieve the 68% reduction in GHG emissions by 2030 required by the 6th Carbon Budget. In that context, the SA is right to note that the developments have the potential to produce significant amounts of GHGs through the</p>

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	the climate and ecological emergency.	assessment within the SA. The carbon emissions impacts of the proposed new developments set out in the Local Plan should feature as a clearly identifiable factor in terms of the consideration of whether or not the development can be categorised as sustainable.	<p>carbon neutrality by 2030.</p> <p>Whatever the methodology, it is not apparent that climate change impacts have featured to any meaningful degree in the Interim SA.</p> <p>Furthermore, we are unable to understand how the higher level of housing need can be assessed as not having impacts significantly more adverse than the lower level, when the SA acknowledges the potential for all the options for development as increasing both embodied and operational carbon.</p>		construction and occupation of the developments. Although it alludes to the opportunities to lower this impact through building energy efficient homes, generating on site renewable energy and delivering sustainable transport, it fails to set out what mitigation measures would be necessary to neutralise the emissions completely and contribute to the radical reduction in emissions necessary to achieve the net zero targets. We therefore do not believe that the assessment outcomes stated in the SA under this objective are at all realistic. In reality, all the proposed options, without the concurrent implementation of significant emissions reduction measures, should be assessed as 'major adverse effect'.

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					<p>It is also noted that even in the assessment as it stands, there is an acknowledgement that developers would need to implement a positive strategy for renewable energy generation and the construction of energy efficient housing. Their track record in this regard does not offer much hope that this will be a priority for them.</p> <p>Carbon reduction targets and monitoring of progress towards them, do not feature in the SA.</p>
<b>AMESBURY</b>	<p>The NPPF indicates that the planning system should help to shape places in ways that contribute to radical reductions in greenhouse gas emissions. The Place Shaping Priorities section of this plan only references climate change and carbon reduction as priorities that apply equally everywhere. There is no</p>	<p>There is no robust evaluation of future emissions or consideration of emissions sources in this section of the plan. Sustainability Appraisal is yet to be conducted for this town, however the absence of a mention of the proposed developments potential to increase GHG emissions is considered</p>	<p>There is no assessment of the consistency of this section of the plan with local or national climate objectives or targets.</p>		<p>This section of the plan contains no information on emissions reduction targets to support either the 6th Carbon Budget or local 2030 commitments. Neither is there any information about how emissions reduction measures will be monitored.</p>

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	subsequent mention about how the plan might contribute to these priorities. This must be addressed to set out how radical GHG emissions reductions will be achieved.	to be an omission (in the Strategic Context section).			
<b>BRADFORD ON AVON</b>	The NPPF indicates that the planning system should help to shape places in ways that contribute to radical reductions in greenhouse gas emissions. The Place Shaping Priorities section of this plan only references climate change and carbon reduction as priorities that apply equally everywhere. There is no subsequent mention about how the plan might contribute to these priorities. This must be addressed to set out how radical GHG emissions reductions will be achieved.	There is no robust evaluation of future emissions or consideration of emissions sources in this section of the plan. Sustainability Appraisal is yet to be conducted for this town, however the absence of a mention of the proposed developments potential to increase GHG emissions is considered to be an omission (in the Strategic Context section).	There is no assessment of the consistency of this section of the plan with local or national climate objectives or targets.		This section of the plan contains no information on emissions reduction targets to support either the 6th Carbon Budget or local 2030 commitments. Neither is there any information about how emissions reduction measures will be monitored.

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<b>CALNE</b>	The NPPF indicates that the planning system should help to shape places in ways that contribute to radical reductions in greenhouse gas emissions. The Place Shaping Priorities section of this plan only references climate change and carbon reduction as priorities that apply equally everywhere. There is no subsequent mention about how the plan might contribute to these priorities, apart from the statement that impacts of any development need to be minimised to help meet the Calne Town Council Climate and Environmental Emergency Pledge. This must be addressed to set out how radical GHG emissions reductions will be achieved.	Sustainability Appraisal is yet to be conducted for this town, however the absence of a mention of the proposed developments potential to increase GHG emissions is considered to be an omission (in the Strategic Context section).	There is no assessment of the consistency of this section of the plan with local or national climate objectives or targets.		This section of the plan contains no information on emissions reduction targets to support either the 6th Carbon Budget or local 2030 commitments. Neither is there any information about how emissions reduction measures will be monitored.
<b>CORSHAM</b>	The NPPF indicates that the planning system should help to shape	There is no robust evaluation of future emissions or	There is no assessment of the consistency of this section of the plan with		This section of the plan contains no information on emissions reduction

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	places in ways that contribute to radical reductions in greenhouse gas emissions. The Place Shaping Priorities section of this plan only references climate change and carbon reduction as priorities that apply equally everywhere. There is no subsequent mention about how the plan might contribute to these priorities. This must be addressed to set out how radical GHG emissions reductions will be achieved.	consideration of emissions sources in this section of the plan. Sustainability Appraisal is yet to be conducted for this town, however the absence of a mention of the proposed developments potential to increase GHG emissions is considered to be an omission (in the Strategic Context section).	local or national climate objectives or targets.		targets to support either the 6th Carbon Budget or local 2030 commitments. Neither is there any information about how emissions reduction measures will be monitored.
<b>CHIPPENHAM</b>	No reference to Wiltshire Climate Strategy or any specific Net Zero targets on WC LP- Planning for Chippenham document.  The Emerging Spatial Strategy proposes radical increase in carbon emissions, rather than reduction by: i.) removing carbon sinks (huge areas of farmland including 3 County Farms); ii.)	Development sites identified through 'sustainability appraisal framework' according to social, economic and environmental criteria and seems to be heavily weighted towards aspirational, unevidenced economic benefits, over-riding climate and environmental damage.	There is no assessment of the consistency of this section of the plan with local or national climate objectives or targets.	Mentions only that "Chippenham, one of many vibrant market towns, is located with the Swindon and Wiltshire Local Enterprise Partnership (LEP) Growth Zone."	This section of the plan contains no information on emissions reduction targets to support either the 6th Carbon Budget or local 2030 commitments. Neither is there any information about how emissions reduction measures will be monitored.  Developments of this size and scale (i.e 2 sites

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	<p>constructing unnecessary roads and concrete flyovers on the River Avon floodplain, with huge quantities of embedded carbon; iii.) locking in car dependency and massive quantities of tailpipe emissions by creating a commuter suburb the size of Calne, with no prospect of local employment for those who relocate there.</p> <p>A highly subjective methodology is employed to dismiss any alternative spatial strategy involving other sites around the town that would not require a distributor road and large-scale infrastructure to cross the flood plain.</p> <p>Brownfield sites (which would cut carbon) are not included in the housing numbers yet these could provide relatively high density, affordable homes and remove the</p>	<p>28 moderate (significant) adverse effects across 7 sites of Chippenham in LPR Interim SA Appendix.</p> <p>No specific baselines or targets detail, but asserts that planning at scale provides better opportunities to moderate additional carbon emissions. Fails to account for the loss of carbon sinks and transport emissions that will be locked in by such large scale commuter extensions on green field sites. Moreover, since these 'preferred sites' are majority Council owned land, they could be secured for renewable energy generation (solar farms in particular), regenerative farming and reforestation, which would more than compensate for any claimed advantages deriving from the scale of the site (those it is not clear what these would</p>			<p>that would take 20% of Wiltshire's total housing) would raise the county's emissions substantially, including the significant carbon intensive construction emission and long term transport emissions resulting from commuting.</p> <p>Reduction targets and means of how net zero would be achieved are essential.</p>

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	<p>need for yet more car dependency, removing the need for more roads and greenfield development.</p> <p>The SA selection criteria are biased in favour of matching the required outcome for the HIF bid, climate change mitigation and adaptation into a single criterion and discounting against speculative economic benefits, for which is no evidence is presented. There is even a 'place shaping' priority that favours building near the River Avon (which builds in a preference for environmental damage).</p> <p>Place Shaping Priorities references priority to address "climate change and achieve carbon reduction" but include no specific baselines or targets.</p> <p>Priorities include: iii) improving access to the River Avon valley</p>	<p>be). As usual, this seems to be an attempt to justify 'preferred sites' to meet the HIF bid road scheme above all else and future carbon emission are simply overlooked.</p> <p>Perversely, it is also stated that these sites secures large areas of land that help the town adapt to flood risks and heatwaves and provides land to enhance biodiversity and protect habitat, when developing these sites destroys wildlife habitats and biodiversity and increases downstream flood risk.</p> <p>Opportunities for renewable energy are being explored by Chippenham Town Council's Neighbourhood Plan and include renewable energy generation on (Wiltshire Council owned) Hardens Farm, which solar developers have</p>			

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	through Chippenham as important green infrastructure corridor for the town. Rather than scoring positively as a reason for selecting an area to build on, this should score negatively as a critical area to protect and avoid developing within, not only but also for climate change mitigation and adaptation reasons.	undertaken to studies to demonstrate is viable (this farm being one of those destined for destruction).			
<b>DEVIZES</b>	The NPPF indicates that the planning system should help to shape places in ways that contribute to radical reductions in greenhouse gas emissions. The Place Shaping Priorities section of this plan only references climate change and carbon reduction as priorities that apply equally everywhere. There is no subsequent mention about how the plan might contribute to these priorities. This must be	There is no robust evaluation of future emissions or consideration of emissions sources in this section of the plan. Sustainability Appraisal is yet to be conducted for this town, however the absence of a mention of the proposed developments potential to increase GHG emissions is considered to be an omission (in the Strategic Context section).	There is no assessment of the consistency of this section of the plan with local or national climate objectives or targets.		This section of the plan contains no information on emissions reduction targets to support either the 6th Carbon Budget or local 2030 commitments. Neither is there any information about how emissions reduction measures will be monitored.

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	addressed to set out how radical GHG emissions reductions will be achieved.				
<b>MALMESBURY</b>	The NPPF indicates that the planning system should help to shape places in ways that contribute to radical reductions in greenhouse gas emissions. The Place Shaping Priorities section of this plan only references climate change and carbon reduction as priorities that apply equally everywhere. There is no subsequent mention about how the plan might contribute to these priorities. This must be addressed to set out how radical GHG emissions reductions will be achieved.	There is no robust evaluation of future emissions or consideration of emissions sources in this section of the plan. Sustainability Appraisal is yet to be conducted for this town, however the absence of a mention of the proposed developments potential to increase GHG emissions is considered to be an omission (in the Strategic Context section).	There is no assessment of the consistency of this section of the plan with local or national climate objectives or targets.		This section of the plan contains no information on emissions reduction targets to support either the 6th Carbon Budget or local 2030 commitments. Neither is there any information about how emissions reduction measures will be monitored.
<b>MARLBOROUGH</b>	The NPPF indicates that the planning system should help to shape places in ways that contribute to radical	There is no robust evaluation of future emissions or consideration of emissions sources in this	There is no assessment of the consistency of this section of the plan with		This section of the plan contains no information on emissions reduction targets to support either the 6th Carbon Budget or

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	reductions in greenhouse gas emissions. The Place Shaping Priorities section of this plan only references climate change and carbon reduction as priorities that apply equally everywhere. There is no subsequent mention about how the plan might contribute to these priorities. This must be addressed to set out how radical GHG emissions reductions will be achieved.	section of the plan. Sustainability Appraisal is yet to be conducted for this town, however the absence of a mention of the proposed developments potential to increase GHG emissions is considered to be an omission (in the Strategic Context section).	local or national climate objectives or targets.		local 2030 commitments. Neither is there any information about how emissions reduction measures will be monitored.
<b>MELKSHAM</b>	The NPPF indicates that the planning system should help to shape places in ways that contribute to radical reductions in greenhouse gas emissions. The Place Shaping Priorities section of this plan only references climate change and carbon reduction as priorities that apply equally everywhere. There is no subsequent mention	There is no robust evaluation of future emissions or consideration of emissions sources in this section of the plan. Sustainability Appraisal is yet to be conducted for this town, however the absence of a mention of the proposed developments potential to increase GHG emissions is considered to be an omission (in the	There is no assessment of the consistency of this section of the plan with local or national climate objectives or targets.		This section of the plan contains no information on emissions reduction targets to support either the 6th Carbon Budget or local 2030 commitments. Neither is there any information about how emissions reduction measures will be monitored.

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	about how the plan might contribute to these priorities. This must be addressed to set out how radical GHG emissions reductions will be achieved.	Strategic Context section).			
<b>ROYAL WOOTTON BASSETT</b>	The NPPF indicates that the planning system should help to shape places in ways that contribute to radical reductions in greenhouse gas emissions. The Place Shaping Priorities section of this plan only references climate change and carbon reduction as priorities that apply equally everywhere. There is no subsequent mention about how the plan might contribute to these priorities. This must be addressed to set out how radical GHG emissions reductions will be achieved.	There is no robust evaluation of future emissions or consideration of emissions sources in this section of the plan. Sustainability Appraisal is yet to be conducted for this town, however the absence of a mention of the proposed developments potential to increase GHG emissions is considered to be an omission (in the Strategic Context section).	There is no assessment of the consistency of this section of the plan with local or national climate objectives or targets.		This section of the plan contains no information on emissions reduction targets to support either the 6th Carbon Budget or local 2030 commitments. Neither is there any information about how emissions reduction measures will be monitored.
<b>SALISBURY</b>	The NPPF indicates that the planning system	There is no robust evaluation of future	There is no assessment of the consistency of this	No mention of the potential impact which	This section of the plan contains no information

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	<p>should help to shape places in ways that contribute to radical reductions in greenhouse gas emissions. The Place Shaping Priorities section of this plan references climate change and carbon reduction as priorities that apply equally everywhere. The Salisbury plan conspicuously does not feature priorities around mitigation of, or adaptation to, climate change. The plan alludes to opportunities to moderate additional carbon emissions, but currently there is no mention about how the plan might contribute to radical emissions reductions. This must be addressed to set out how radical GHG emissions reductions will be achieved.</p>	<p>emissions or consideration of emissions sources in this section of the plan. Sustainability Appraisal assesses that climate impacts of the selected sites is only of minor adverse effect, for which mitigation is easily achievable. It is hard to see how this conclusion is arrived at in the absence of robust data about the loss of carbon sinks, the embodied carbon associated with site development or the ongoing operational carbon that would be generated by the developments. The references to sustainable construction and opportunities for on site renewable energy generation are not quantified, so it is impossible to assess whether the carbon impacts would be mitigated.</p>	<p>section of the plan with local or national climate objectives or targets.</p>	<p>further development, particularly south of Salisbury, might have in terms of traffic and recreational pressures on the New Forest. Parts of South Wiltshire in the Salisbury HMA come under the New Forest National Park Authority for planning purposes.</p>	<p>on emissions reduction targets to support either the 6th Carbon Budget or local 2030 commitments. Neither is there any information about how emissions reduction measures will be monitored.</p>

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<b>TIDWORTH AND LUDGERSHALL</b>	The NPPF indicates that the planning system should help to shape places in ways that contribute to radical reductions in greenhouse gas emissions. The Place Shaping Priorities section of this plan only references climate change and carbon reduction as priorities that apply equally everywhere. There is no subsequent mention about how the plan might contribute to these priorities. This must be addressed to set out how radical GHG emissions reductions will be achieved.	There is no robust evaluation of future emissions or consideration of emissions sources in this section of the plan. Sustainability Appraisal is yet to be conducted for this town, however the absence of a mention of the proposed developments potential to increase GHG emissions is considered to be an omission (in the Strategic Context section).	There is no assessment of the consistency of this section of the plan with local or national climate objectives or targets.		This section of the plan contains no information on emissions reduction targets to support either the 6th Carbon Budget or local 2030 commitments. Neither is there any information about how emissions reduction measures will be monitored.
<b>TROWBRIDGE</b>	The NPPF indicates that the planning system should help to shape places in ways that contribute to radical reductions in greenhouse gas emissions. The Place Shaping Priorities section of this plan references climate	There is no robust evaluation of future emissions or consideration of emissions sources in this section of the plan. Sustainability Appraisal assesses that climate impacts of the selected sites is only of minor	There is no assessment of the consistency of this section of the plan with local or national climate objectives or targets.		This section of the plan contains no information on emissions reduction targets to support either the 6th Carbon Budget or local 2030 commitments. Neither is there any information about how emissions reduction

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	change and carbon reduction as priorities that apply equally everywhere. The Trowbridge plan additionally includes priorities around self-containment to reduce the need to travel, and improving the range of transport modes to reduce reliance on private cars. Currently there is no mention about how the plan might contribute to radical emissions reductions. This must be addressed to set out how radical GHG emissions reductions will be achieved.	adverse effect, for which mitigation is easily achievable. It is hard to see how this conclusion is arrived at in the absence of robust data about the loss of carbon sinks, the embodied carbon associated with site development or the ongoing operational carbon that would be generated by the development. The references to sustainable construction and opportunities for on site renewable energy generation are not quantified, so it is impossible to assess whether the carbon impacts would be mitigated.			measures will be monitored.
<b>WARMINSTER</b>	The NPPF indicates that the planning system should help to shape places in ways that contribute to radical reductions in greenhouse gas emissions. The Place Shaping Priorities	There is no robust evaluation of future emissions or consideration of emissions sources in this section of the plan. Sustainability Appraisal is yet to be conducted for	There is no assessment of the consistency of this section of the plan with local or national climate objectives or targets.		This section of the plan contains no information on emissions reduction targets to support either the 6th Carbon Budget or local 2030 commitments. Neither is there any information about how

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	<p>section of this plan references climate change and carbon reduction as priorities that apply equally everywhere. The Warminster plan additionally mentions that the Neighbourhood Plan will be able to consider locally specific policies for climate change. Currently there is no mention about how the plan might contribute to these priorities or policies. This must be addressed to set out how radical GHG emissions reductions will be achieved.</p>	<p>this town, however the absence of a mention of the proposed developments potential to increase GHG emissions is considered to be an omission (in the Strategic Context section).</p>			<p>emissions reduction measures will be monitored.</p>
<b>WESTBURY</b>	<p>The NPPF indicates that the planning system should help to shape places in ways that contribute to radical reductions in greenhouse gas emissions. The Place Shaping Priorities section of this plan only references climate change and carbon</p>	<p>There is no robust evaluation of future emissions or consideration of emissions sources in this section of the plan. Sustainability Appraisal is yet to be conducted for this town, however the absence of a mention of the proposed</p>	<p>There is no assessment of the consistency of this section of the plan with local or national climate objectives or targets.</p>		<p>This section of the plan contains no information on emissions reduction targets to support either the 6th Carbon Budget or local 2030 commitments. Neither is there any information about how emissions reduction measures will be monitored.</p>

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	reduction as priorities that apply equally everywhere. There is no subsequent mention about how the plan might contribute to these priorities. This must be addressed to set out how radical GHG emissions reductions will be achieved.	developments potential to increase GHG emissions is considered to be an omission (in the Strategic Context section).			

## Findings

This response by Wiltshire Climate Alliance to the Local Plan review analyses the documents that make up the plan with a focus on its ability to positively influence the achievement of the net zero by 2030 target (whilst also considering the 6th Carbon Budget target of a 68% reduction in emissions by 2030). The key findings from this analysis are set out in the below bullet points:

- The assertion in the Emerging Spatial Strategy that ‘carbon reduction is already an integral theme of the Local Plan’ is disingenuous. There is almost no evidence in the Plan documents that point to carbon reduction being important, let alone an integral factor in the determination of housing numbers or the assessment of where housing could be located within the county. There are no carbon reduction targets set out in the plan that give any confidence that the net zero target is being taken at all seriously in this process.
- The assessment criteria in the Sustainability Appraisal provide insufficient weight to the impacts of global heating and no meaningful strategies are proposed that would mitigate the adverse impacts of the embodied carbon or operational carbon associated with the proposed new developments, or indeed the very negative impacts of the destruction of carbon sinks and biodiversity that would result from the predominantly greenfield development that the Local Plan is recommending.
- The Climate Change and Biodiversity Net Gain section of the Local Plan is well written and correctly identifies many of the issues around the threat climate change poses. Particularly it identifies the need for robust, forward thinking policies to adapt to and mitigate the effects of climate change. Unfortunately, the spatial strategy bears no relation to this (and presumably was formulated before it) and the rest of the Local Plan, such that it is, does not contain any such policies.

- The Climate Change and Biodiversity Net Gain section highlights the need for all the Council's plans to work synergistically towards achieving the net zero goal. There is insufficient evidence in the current suite of Local Plan documents that indicate that this is yet happening.

## **Conclusions**

The Council asserts that the Local Plan Review 'will play a key role in helping to deliver not only the Council's carbon reduction aspiration, but also achieving compliance with legislation and national planning policy expectations regarding climate change' (Emerging Spatial Strategy, 2.3). If these aspirations and expectations are to be realised, the next iteration of the Plan must explicitly set out the carbon implications (both embodied, operational and consequential, including associated land use and transport emissions) of proposed new development. It must also set carbon reduction targets that provide a route to achieving the net zero goal, to enable proper scrutiny of the plan, and the extent to which it contributes to the necessary emissions reductions. Those targets must be accompanied by realistic and deliverable policies that work synergistically across the whole of the Council's planning responsibilities.

Prepared by Sustainable Development Topic Group, Wiltshire Climate Alliance, March 2021.

## 8. ACCESS AND INCLUSION

### Content of the Local Plan

Environmental Sustainability is integral to community health and wellbeing. Therefore, public health, access and inclusion should be at the heart of any planning proposals. There is no mention in any of the key consultation documents of health and wellbeing, equality, access or inclusion.

The Public Sector Equality Duty of the Equality Act 2010, places a duty on public authorities to consider or think about how their policies or decisions affect people who are protected under the Equality Act, notably in this case, people who are older, disabled, or of a different ethnicity. With an ageing population, this Public Sector Duty should mean that access and inclusion should be embedded in all planning decisions, and consultation strategies. It is apparent that this is not the case in this Local Plan Review.

The following comments are made:

- **Housing Location:** Housing allocation on greenfield edge-of-town sites is inappropriate for people with no, or limited access to a car. Brownfield in-town sites within a 10-minute walking distance of existing essential shops and services would offer the level of access required. These should be prioritised in the Local Plan.
- **Housing Type:** Traditional two-storey developer housing for private ownership is inappropriate for many people with mobility impairments, or older people needing a small low-maintenance home. For reasons of health, accessibility, affordability and Climate Change, the Local Plan must presume that the majority of homes will be small dwellings. The highest possible energy efficiency standards, within the context of net zero carbon development policies should be mandatory.
- **Housing Tenure:** The Local Plan appears to presume a predominance of home purchase whereas there is a documented shortage of Social rented accommodation. The Local Plan should focus on and prioritise housing provision in the social rented sector, so that the most vulnerable in society can remain living close to established support networks
- **Other issues:**

In addition to concerns we have about housing allocation, we also highlight our concerns about the absence of any consideration in the Local Plan with regards to health and wellbeing. Older, disabled and more vulnerable people will be negatively impacted by:

- Increased air pollution arising from additional roads and vehicles;
- Increased social isolation arising from dwellings sited further away from centrally-based shops and services and cost/infrequency of public transport;
- Decrease in quality of life, emotional and physical wellbeing, if local green spaces are replaced by housing developments (there being a strong evidence base associating nature and positive health/recovery outcomes).

## Consultation Process

In addition to grievances regarding the content of the Local Plan, we have serious concerns about the consultation process itself. Our view is that the consultation has not been inclusively conducted and that *indirect discrimination* has taken place. Indirect discrimination, outlawed under the Equality Act 2010, is where organisational practices and policies that apply to everyone, put some people with a protected characteristic at an unfair disadvantage.

We have evidence from multiple sources: surveys, emails and spoken reports from local people all over Wiltshire – that the consultation has excluded vast numbers of people – notably those who are older, with sensory or cognitive impairments, or simply without IT/internet access. It has also excluded people from ethnic minorities for whom English is their second language.

### Summarised feedback:

- a. **Lack of prior information:** As the consultation was conducted during a global pandemic and national lockdown, only a very small proportion of the population knew about the consultation, and these were people who:

- a) had internet access;
- b) were already actively engaged in local community affairs.

The Government's Planning Practice Guidance (PPG), paragraph 078 requires "alternative or creative approaches" to inform or engage with people who are not online. There is no evidence of these having been undertaken, and the vast majority of those who were aware were informed about the consultation by their own personal contacts (usually online).

- b. **Lack of face-to-face explanation; inaccessibility of Webinar presentation:** A single, 45-minute online presentation was offered for each town. No alternative times were offered for people who were unavailable to make their town's particular time-slot. People without internet access were excluded from these sessions. Many could not access the presentation due to technical issues at the Wiltshire Council end. The language used during the presentations was reported to be 'too technical' for many listeners to understand. The presentation slides can now be viewed online, but the spoken presentation itself cannot. The slides on their own do not convey the information people need to understand the Council's rationale for its proposals.
- c. **Disjointedness of the Wiltshire-wide consultation:** The consultation has been designed to elicit responses from local residents, with a focus on each area separately. Naturally when looking at the list of towns people are inclined to click on their own town's documentation. Every document is complex, and with a minimum of two town-focused papers to read and understand, people have not looked at the plans associated with neighbouring towns. We understand that many small villages (and their parish councils) have not felt the Local Plan necessarily applied to them, as the wider picture, including impacts on transport and traffic has not be clearly presented.
- d. **Complexity of the paperwork:** To understand the rationale behind the Local Plan proposals, it is suggested that 5 fairly complex consultation documents be read, totalling 155 pages of information. In addition to these there are at least 12 technical supporting documents. None of these is straightforward for a layperson to read: there are no 'easy read' versions. It is clear from many of the comments submitted to us (75% of survey respondents in addition to emailed reports), that people were perplexed

by the documentation and language and found they were not straightforward in conveying the essential information they needed to know to make an informed response.

- e. **Inappropriate and inadequate timing:** This consultation we argue, is poorly timed. Legal advice from David Manley QC and Piers Riley-Smith of Kings Chambers makes this point: *“The planning system is facing unprecedented challenges during the Covid-19 pandemic. It is of course important that, where they can be made, compromises are reached which allows for the continued operation of the planning regime. However, those compromises cannot be made at the price of public participation.”* [2]

Furthermore, the Gunning principles (coined by Stephen Sedley QC, and cited by the Local Government Association) [3] state that a consultation is only legitimate if there is sufficient information to give ‘intelligent consideration’ ; i.e. the information must be readily available and accessible; and there is adequate time for consideration and response; i.e. there must be sufficient opportunity for consultees to participate in the consultation, and the timeframe must be flexible to allow consultees to respond.

It is apparent from emailed reports, survey responses and verbal interactions with members of the public that given the lack of information and complexity of documentation, and the unavailability of face-to-face meetings, public participation has been sacrificed for expediency and pressure by Government to continue the process. No additional time has been allowed, to facilitate access by people who are not online, who need clear face-to-face interaction (e.g. people with hearing impairments who need to lip-read), or people who simply require more time to absorb and understand the documentation. We argue that this lack of flexibility and unwillingness by the council to extend the consultation period or reasonably postpone the process, is discriminatory and represents a clear breach of the spirit of the PPG, the Gunning Principles, and importantly, the Public Sector Equality Duty.

## Conclusion

It is clear from the lack of any reference to public health, access, equality and inclusion in any of the consultation documents, that Wiltshire Council regards these issues as unrelated to environment and planning. The housing allocation sites as set out in the documents bear little relation to what older people, people with disabling conditions, and people on low incomes actually need.

With regards to the process itself, the council would argue that it is meeting its obligations to consult the public in accordance with the regulations set out in the Town and Country Planning (Local Planning) (England) Regulations 2012, the Planning Practice Guidance (updated July 2020 in light of the Covid-19 pandemic), and its own Statement of Community Involvement – Temporary Arrangements (July 2020). The council may also argue that access and inclusion are embedded in its decision-making with regards to formulating local plans.

However, unsolicited comments and anecdotal reports from councillors and members of the public and responses to our survey, strongly indicate that this is not the case. Our response concludes that not only is Wiltshire Council failing in its public duty as outlined in the Equality Act 2010, to include more vulnerable members of society in its planning decisions, it is also failing to ask them for their opinions.

Note: A longer version of this response, including supporting appendices, has been sent to Wiltshire Council separately.

## 9. OVERALL CONCLUSIONS AND RECOMMENDATIONS

At a time of climate and ecological emergency, the Local Plan and associated Local Transport Plan have the potential to do significant damage to the climate and environment and at the same time represent an opportunity for Wiltshire Council to begin to deliver on its commitment to seeing to make Wiltshire carbon neutral by 2030 and support the national targets under the Climate Change Act, as it has a responsibility to do.

As they stand, Wiltshire Council's Local Plan proposals would do enormous damage to our climate and environment and would set Wiltshire back years on its journey to net zero, cancelling out progress achieved on its operational carbon reduction many times over.

Despite recognition of the kind of action that is required in the supporting document on Climate Change, the spatial strategy seems to not to have incorporated any of it and appears to have been developed on a political judgement about long term growth without considering the negative consequences that its approach will bring. Mitigating future impacts of global heating and adapting to the adverse changes that are already locked as a result of previous inaction means the world (including Wiltshire) has to embark on a programme of radical emissions reductions, and spatial and transport planning are no exception.

Adverse impacts of the existing spatial strategy/ Local Plan proposals include:

- Destruction of carbon sinks (farmland and woodland);
- Emissions for the construction of (unnecessary) roads, bridges, and fly-overs;
- Driving up and locking in transport emissions as a result large out-of-town commuter suburbs in towns like Chippenham;
- Lack of commitment to net zero carbon development policies - which are already legal/ viable and likely to be mandatory in future;
- Lack of commitment to designating sites for renewable energy generation, such as council owned farmland and County farms;
- Lack of commitment to a tree canopy target and planting trees on Council owned land;
- Destruction of natural capital, wildlife habitats and existing and future biodiversity (included endanger species);
- Destruction of high-quality farmland - including some of the best and most versatile- which could support local food production and national food security;
- Destruction of County farms, set up to provide employment opportunities for the next generation of farmers;
- Exacerbation of future flood risk from large urban developments in the river catchments, threatening not only local communities but also out of county areas;
- Undermining of local communities' resilience to climate change impacts by building adjacent to (expanding) flood plains.

All of which is driven by excessive housing numbers and a lack of proper consideration of the climate and environment. The SA barely considers carbon emissions, conflating mitigation and adaptation into a single (one of 11 and sometimes 12) assessment criteria, trading off adverse impacts against aspirational economic benefits, and dismissing environmental impacts as mitigatable, without offering any further information on how. There are no measurable carbon reduction targets or milestones within the Plan, or even any commentary on how the Plan will help get Wiltshire to net zero by 2030.

It seems clear that the housing target for Wiltshire is too high and needs to be reduced. The site selection process needs to be repeated with these lower numbers and a set of criteria that prioritise local housing and employment needs alongside a carbon reduction strategy, rather than the current in-migration based, housing led and environmentally destructive one that has been put forward.

In this regard, we recommend the Local Plan follows the advice given by Client Earth in its [letter](#) to Wiltshire Council of Sept. 2019, including:

- Setting a local carbon target framework based on a comprehensive assessment of carbon reduction potential in relation to carbon reduction targets;
- Demonstrating proposed planning policies' consistency with this local target framework; and
- Monitoring performance on at least an annual basis using relevant indicators.

In taking a completely new approach, the revised Spatial Strategy and Local Plan policies should aim to prevent:

- Destruction of natural capital and carbon sinks;
- Operational emissions resulting from new housing and business/ industrial premises;
- Construction of carbon intensive infrastructure (including embedded emissions in materials such as concrete and asphalt);
- Additional transport mileage that would result from creating car dependency and reliance on commuting.

They should also aim to avoid additional emissions/ reduce the county's emissions by focusing on:

- Reduced housing numbers in sustainable locations (well connected to existing settlements and making optimal use of existing infrastructure);
- Local employment led (not housing led) development;
- Net zero development policies, including highest standards of building insulation (domestic and commercial);
- Promotion of investment in renewable energy generation (including on its own farms);
- Promotion of innovative and progressive farming methods;
- Investment in infrastructure to support active travel (for short journeys) and public transport (modal shift); and
- Investment in infrastructure to support the transition to ultra-low emission vehicles.

The carbon emissions associated with proposed housing numbers in proposed locations should be calculated up front so as to properly inform the Plan and allow for the proper comparison of potential sites at the outset. No sites should be designated as 'preferred' until such time as the climate change implications (including estimated net carbon emissions) have been calculated. The impact of the proposed development in helping Wiltshire attain net zero should be one of the key decision criteria.

Wiltshire Council also needs to be cognisant of the fact that flood risk to the whole county of Wiltshire will increase significantly over the coming 15 years and needs to ensure its evidence is up to date and sufficient headroom for climate change is built in.

Finally, we would endorse the recommendations of the Global Warming and Climate Emergency Task Group in its [Report of the Global Warming & Climate Emergency Task Group \(Part Two\)](#), which would support such a revised approach.

**STRAT362**

The following points with which we agree were raised by Salisbury Transition City and 'Cogs'

1. There is no adequate justification for exceeding the 40,840 minimum housing target set for Wiltshire by approx. 5,000 houses.
2. In the Plan period to 2056 decisive action is needed to reduce carbon emissions, and Wiltshire Council voted in Feb 2019 to seek to reduce Wiltshire's carbon emissions to net zero by 2030.
3. The Plan needs to include a calculation of the County's carbon footprint and contain year-on-year targets for how this will be reduced. All proposed developments must have their emissions impacts – including transport - quantified and the cumulative impact compared to these targets.
4. There should be protection for the best and most versatile agricultural land, since this helps to sequester carbon and ensure local food production and future food security.
5. Much more emphasis is needed on redeveloping brownfield sites. In Salisbury the long-term use of Churchfields should be reconsidered, particularly noting the ongoing Air Quality issues being caused by lorries accessing the site. There is also scope for incentivising the use of Park & Ride and redeveloping some of the City Centre car parks for housing, as proposed in the Central Area Framework.
6. In the post-Covid world, with fewer retail outlets in the city centre the possibilities of increasing vibrancy through redevelopment as residences, business hubs and community facilities should be explored.
7. All new development must be designed to achieve net zero carbon standards through energy efficiency, plot orientation and the incorporation of renewable energy generation.
8. There should be policies to encourage renewable energy generation, including making specific provision for onshore wind generation.
9. There needs to be a change from the conventional approach of providing new road capacity to meet predicted changes in travel demand. Planning should maximise the potential for local living, ensuring services are readily accessible by walking and cycling.
10. Residual travel demand should be shifted away from private vehicles to active, public and shared forms of transport. Access and parking restrictions for private vehicles will help to create liveable streets and ensure that sustainable modes are always the most convenient and affordable choice.
11. The Transport Review assigns a low priority to Highway Schemes, with a high priority to active travel and a medium priority to Public transport schemes- (transport Review App A}. Yet the amounts assigned to each are £31.7 million to Active Travel, £10.5 million to public transport and over £300 million to road schemes.
12. The carbon impacts of these schemes are unqualified and this reflects a flawed and outdated approach to transport and land use planning.
13. The railway schemes which WC has supported in SWLEP's 'Swindon and Wiltshire Rail Study, Rail Strategy Report [July 2019] should also be supported in the Local Plan - this included new stations at Devizes Parkway, Porton and Wilton (subject to results of study on Porton) as well as service improvements.
14. This Local Plan is the best, and last, chance for 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. The current proposals for the Local Plan must be completely rewritten on this basis.

endorsed by



**STRAT363**

## Response to Wiltshire Council's Local Plan Review Consultation (2016 - 2036)

### 1. Housing numbers proposed for Wiltshire are too high

Wiltshire's housing numbers are based on 2014 housing projections, when the national population was growing much faster than currently. If either the 2016 or 2018 projection were used this would result in a 24% lower baseline. They are also based on a workplace affordability uplift (of 36%) which has been applied inappropriately, since a significant proportion of the working population work for organisations outside Wiltshire. Wiltshire Council has also added another 4,790 houses based on an out of date economic trends forecast. It is my understanding that Ministry of Defence housing (several thousand) and brownfield sites within existing urban areas (also significant numbers) are not included in the housing figures, making the total even higher. As a rural county, with valuable farmland and wildlife habitat, and a lack of local employment opportunity for all the in-migration the houses will lead to, these numbers will put enormous strain on our towns, villages and natural environment, with few benefits and huge downsides (congestion, pollution, loss of amenity) for Wiltshire residents. The inflated housing figures also make it harder for Wiltshire Council to meet its 5 year housing land supply (which it is already failing to meet under the current Plan), further undermining Neighbourhood Plans and allowing speculative planning applications to be granted permission. They also undermine existing Neighbourhood Plans and the work local communities have done to protect natural capital and allocate housing away from environmentally valuable areas such as the Avon and Marden valley.

Wiltshire Council should therefore:

- Abandon the notion of adding an additional 5,000 houses;
- Push back on MHCLG to get the 40,840 number reduced;
- Focus on maximising the number of brownfield sites within the target;
- Consider the housing needs of rural settlements or small towns in the post covid world in which they will benefit from affordable housing, primary schools, surgeries, local shops and community amenities to remain viable.

### 2. Housing Targets in Chippenham are too high

Far too many houses have been allocated to Chippenham. The numbers are double previous targets and way above what had previously been discussed with members of the Town Council and Chippenham Neighbourhood Plan. The previous Chippenham Site Allocations Plan (CSAP) to 2026 identified sites at Rawlings Green and to the South West of Chippenham for 2,050 houses. Building work has not started on any of these, so to start allocating even more land for development is premature and risky. Growth at Chippenham is constrained by the particularly beautiful and biodiverse countryside around the Avon and Marden river valleys, which is highly valued by the residents of Chippenham and the surrounding villages. The proposal to build a £75m distributor road to the South and East of Chippenham with 7,500 houses (5,100 by 2036) and associated commercial land is equivalent to adding a town the size of Calne. Two thirds of Chippenham's workers commute (many considerable distances along the M4) to their place of work. None of the 26ha of employment land designated in the current CSAP has attracted any employers and several employers have moved out of the town or contracted/ pulled back on expanding in recent years. Building huge suburban extensions will increase the number of commuters, increase congestion (15,000 more cars), drive up carbon emissions, whilst damaging Chippenham's market town heritage and the Avon and Marden valleys upon which people place so much value.

Wiltshire Council should therefore:

- Reduce Chippenham share of houses to no more than the previous Local Plan which would leave a residual number of houses to be built of 1,370 which could more sustainably be accommodated on a combination of brownfield sites and other smaller sites, without needing destroy the Avon and Marden valley.

### 3. Chippenham Site 1 Should not be a Selected for Development

There would be huge environmental and Climate Change impacts from Wiltshire Council selecting Site 1, including destruction of two river valleys, hundreds of acres of productive farmland (some of the best and most versatile in the country) substantial loss of natural capital, destruction of wildlife habitats (including endanger species) and an unacceptable impact on the climate. It is clear that the site was pre-selected to support the Council's HIF bid for a £75m road (not mentioned here), which it disingenuously 'sold' to the public as a 'relief road' and which the public and all the surrounding town and parish councils have now rejected. Such is the determination for predetermination of this site that even the interim SA has also suggested that the environmental impact of destroying prime wildlife habitat and high quality farmland, bordered by two river valleys, requiring carbon intensive infrastructure (railway bridge, two extended floodplain river crossings, canal bridges and miles of road within metres of the river Marden, is less than developing alternative sites on poorer land, away from rivers and already close to existing infrastructure such as the A350 and the electricity grid. The site selection process ('place shaping priority') even has 'proximity to the River Avon corridor' as a reason for selecting for development rather than avoiding. protecting.

Wiltshire Council should therefore:

- Withdraw its proposals for Site 1 and reappraise all potential sites around Chippenham under the new lower housing target, including brownfield urban regeneration;
- Introduce long term protection status for the River Avon and Marden valley to the East of Chippenham and invest in enhancing its wildlife and positively developing Wiltshire Council's farms for sustainable food production, renewable energy generation and reforestation.

### 4. The Sustainability Appraisal (and therefore the Spatial Strategy) is fatally flawed

The Interim Sustainability Appraisal is at best completely inadequate and at worst has been used to justify the conclusions being sought. Huge development areas are selected on the basis of being slightly less adversely impacted or being said to be mitigatable without any evidence (at all) to back up the assertions. Sites are selected with no real rationale on how assessment outcomes were reached. And perhaps least surprisingly, those areas that support the building of the distributor road under the HIF Bid somehow come out "best" according to the sustainability criteria (sometimes 11, sometimes 12) being used. Climate change mitigation is conflated with adaptation and together forms a single criterion, to be compared against multiple others, including aspirational (and completely unevicenced) economic benefits, which then justify writing off vast swathes of countryside and high-grade agricultural land. There is no explanation as to the wight given to sub-elements of these criteria such as greenhouse gas emissions. There is no attempt to quantify the extent of the climate and environmental destruction. All of the above underlines the unspecified and hence unaccountable balance of qualitative judgements and evidence acknowledged contained within the Interim Sustainability Appraisal, which is seriously deficient, yet used to as a justification for the site selections put forward in the Spatial Strategy.

With regards land use; no attempt seems to have been made to assess the value of existing farms, their contributions to public benefit or their future potential in the Plan period. This serious shortcoming is embedded in the construction and application of the site selection criteria. For the 'preferred sites' for Chippenham, for example, the SA (Section 5.2.5) comments that "given the significant size of this site, there will be a significant loss of greenfield, agricultural land of medium quality," ignoring the fact that this includes a significant amount of the 'Best and Most Versatile' agricultural land. Similarly, there is no consideration of the use of local farms for local food production (including eoc/organic), tree planting or renewable energy generation, as an alternative land use, or any value placed on the loss of such. Neither is its value considered in terms minimising vulnerability to surface water flooding or locally valued landscapes, or in relation to the landscape aim to "conserve and enhance the character and quality of rural and urban landscapes, maintaining and strengthening local distinctiveness and sense of place" and 'minimise the impact on locally valued landscapes".

## 5. The Plan does not address the Climate and Ecological Emergency

Wiltshire Council's current Local Plan proposals would substantially increase the county's carbon emissions and lock in emissions for years to come. The Local Plan documents point out that "in February 2019 Wiltshire Council acknowledged a climate emergency and agreed to seek to make the county of Wiltshire carbon neutral by 2030" and that "mitigation is related to dramatically reducing the amount of carbon released in Wiltshire," which is "largely related to emissions from cars and the energy used to heat and power homes and businesses." It is also acknowledged that there is a need to "shape places to help secure radical cuts in greenhouse gas emissions, for example through efficient building design and changes to the way we travel," and "actively support and help to drive the delivery of renewable and low-carbon energy generation and grid infrastructure." Yet these proposals fail to consider climate change and biodiversity in relation housing numbers and locations and fail to propose a strategy and policies that would deliver what is acknowledged is needed. Simply cutting back on the excessive and ultimately, undeliverable target would immediately result in a reduction in emissions and a greater proportion of development on brownfield sites and those close to existing infrastructure, closer to existing centres of population. But a much greater reduction in the housing target would be needed to make the Plan sustainable and compliant with the stated aim of "dramatically reducing the amount of carbon released in Wiltshire."

After reducing the housing targets and locating development more sustainably so as to reduce the need for carbon intensive infrastructure and car dependency, the way to "shape places to help secure radical cuts in greenhouse gas emissions" should be through net zero carbon development policies and policies that promote investment in renewable energy generation. Net zero development entails high energy efficiency standards, with on-building/ on-site renewable energy generation to cover operational energy consumption during the lifetime of the development, any remaining carbon emissions being offset through a renewable energy generation offset scheme (reference the Wiltshire Council Climate Emergency Task Group Report (Part 2) on planning). Adopted plans such as the London Plan already have such policies in place and many local planning authorities (LPAs) are including them in their emerging Local Plans, in anticipation of the inevitable changes to the planning system to bring it in line with the Climate Change Act and national carbon reduction targets (net zero by 2050 and a 68% reduction on a 1990 baseline by 2030). Planning legislation already allows for such policies and the Government has reiterated that the soon to be introduced Future Homes standard on energy efficient buildings will be a floor not a ceiling as far as Council's ambitions to achieve net zero development are concerned. The excuse that viability wouldn't allow this carries little weight, given that viability needs to be assessed at the site allocation stage and developers will be clear about the costs of developing particular sites at a sufficiently early stage. Given that such policies will eventually be the norm across all LPAs, costs will in any case rapidly reduce as carbon neutral development becomes the norm, as it will have to be.

The question that needs to be asked of Wiltshire Council (rather than Wiltshire Council asking of its residents) is "How will this proposed Plan cut carbon emissions in line with the national targets, as it is required to do under planning legislation that refers to LPAs obligations under the Climate Change Act?" (i.e., at least 68% reduction on a 1990 baseline by 2030). This does not seem to even feature in the preparation of this Plan yet is the fundamental question it should be addressing. The consultation documents have not even produced any estimate of the carbon implications of the Plan, let alone calculated how the housing numbers proposed and spatial strategy being promoted would contribute to reducing overall emissions.

Finally, the approach to biodiversity is based on a fundamental misunderstanding that natural habitat destruction can be compensated by marginal improvements to nature elsewhere. The question misses the point completely in that successfully enhancing natural capital requires it isn't destroyed in the first place. Hence the need to avoid building on valuable habitats and carbon sinks, such as the land to the East of Chippenham. High quality pasture land and river valleys are finite and irreplaceable, and need to be protected and enhanced in their current state. In describing biodiversity offsetting and net gain as "[licence to trash nature](#)," environmental charity Friends of the Earth point

out that nature is declining in the UK, natural ecosystems are under stress and many parts of the UK are becoming biodiversity deserts. Their view is that biodiversity net gain should be a last resort, used only when every avenue to avoid environmental harm has been exhausted.

In terms of habitat destruction and biodiversity loss, no material consideration seems to have been given to the natural capital/ biodiversity impacts of developing Chippenham's sites 1 and 2, and there is only one question that refers to this in the Climate Change and Biodiversity Net Gain section. Questions asked of Wiltshire Council officers in the consultation webinars and at the Chippenham Area Board indicate that these impacts have not been considered in any depth and that this would be done at a later stage (by which time it will be harder to take account of what's discovered, properly consider alternatives and progress the kind of radically different Plan that is needed). Given the unique nature of the Avon and Maren valley and the loss of valuable habitats and biodiversity that would occur if these proposals were to go ahead, we have added our comments on habitat destruction and biodiversity loss under question B2.

Losses in biodiversity will be incurred through direct habitat loss to facilitate any roads including significant grassland cover and hedgerow losses. Given the wide-reaching impact this will have, this scheme will not be capable of delivering no net losses in biodiversity without significant investment into improving surrounding habitats, which would be difficult to achieve with the added complication of residential suburbs being included. The fragmentation and loss of the habitats which will be anticipated to be cleared if the proposed schemes go ahead has the potential to be directly detrimental to numerous species and contravenes guidance set out in NPPF (Section 15 Paras 170, 171 and 175). The Local Plan should also seek to maximise the value of existing farmland in terms of carbon capture, particularly its own farms where it has direct influence over the land and the way in which it is managed. It should plan for a future which encourages progressive agroecological and regenerative methods that promote carbon sequestration and storage

In addition, the UK Climate Impact Projections have revealed that climate change impacts are manifesting more rapidly than anticipated, and areas adjacent to current undevelopable flood zones, could well become part of those zones in future. It would be unwise to rely on expensive Sustainable Urban Drainage scheme (SUDS) solutions to mitigate flood risk that is avoidable in the first place. In addition to the substantial cost and space requirement, claims that all new development would include SUDS to achieve a 'greenfield runoff rate plus 20%' seem unrealistically optimistic, and lack evidence. 20% may also turn out to be an insufficient margin to compensate for future climate change scenarios and the likely more intensive rainfall events that are the cause of rapid river level rises and associated downstream flooding.

Wiltshire Council therefore needs to:

- develop a genuinely sustainable spatial strategy that is not dependent on commuting;
- reduce housing numbers to allow for more organic growth that will not cause the substantial harm associated with the current proposed strategy;
- take an employment (rather than a housing led) approach;
- measure the carbon emissions associated with its spatial strategy options and prioritise minimising current and future emissions;
- develop a framework for aligning the Local Plan with the Government's and Wiltshire's carbon reduction targets;
- place proper value on natural capital and account for it in the Plan;
- develop and implement net zero carbon development policies and low carbon, sustainable construction policies;
- develop and implement supportive renewable energy development policies;
- develop and implement supportive EV infrastructure policies;
- develop and implement supportive integrated public transport and active/ battery assisted travel infrastructure development policies.

The proposals as they stand would destroy nearly 1,500 acres of farmland and valuable wildlife habitat. The carbon footprint of destroying prime countryside to create this massive development that would then generate even more transport emissions has not even been calculated but there is no doubt that it will take Wiltshire Council's carbon reduction target in completely the opposite direction. Does Wiltshire Council really want to be responsible for such a legacy?

## **6. The Distributor Road has been firmly rejected by all Local Councils**

Wiltshire Council have used a grant of £75m from Homes England to propose a distributor road to enclose huge development areas. The public were not consulted. The general public have been confused, believing headlines about a 'relief road' that would alleviate traffic, when in fact this would be a low speed distributor road that brings 7,500 and potentially 15,000+ additional vehicles into and around the town. Fortunately our town and parish councillors have seen through the HIF bid proposals and rejected the road entirely following a consultation that tried to gather consent for one or more of the route options (before housing numbers and locations had even been consulted upon). Chippenham Town Council, Calne Town Council and Bremhill Parish Council have all passed resolutions opposing any distributor road at all. Chippenham Town Council also firmly rejected the Local Plan proposals for Chippenham unanimously voting to inform Wiltshire Council that their case for Chippenham housing numbers and locations has not been adequately made, and is not accepted for the following reasons:

1. 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.
2. The proposals to develop large suburbs to the East (Site 1) and South (Site 2) would have a severe adverse impact on the town and cause unacceptable damage to the local environment through the destruction of high-quality farmland and wildlife habitat in the Avon and Marden Valley.
3. The Chippenham housing numbers and their location should not be dictated by a grant application for a road, which did not undergo any public consultation, and which serves to predetermine the spatial strategy.
4. 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.

See: [Chippenham Town Council say no to proposed new housing in Wiltshire Council's Local Plan Review Consultation • Chippenham Town Council](#)

## **7. Existing Residents are ignored**

Existing residents, who should be at the top of the list of stakeholders, are hardly mentioned at all within these proposals. All the benefits and new infrastructure talked about is in new housing areas, not existing ones. Local people who are key stakeholders in Chippenham's future and are simply ignored by this Plan. Neighbourhood Plans such as Bremhill's (which will have its designated green buffer obliterated by these proposals) and Chippenham, whose Vision is for "employment-led development" that is "appropriate in scale" and "environmentally sustainable" are treated with disdain.

These plans destroy local amenity and the local environment for the residents of Pewsham, London Road and Monkton Park, destined to become inner urban wards within new suburbs. Residents in Stanley move from being a hamlet in open countryside to being sliced through with a distributor road. This means no access to countryside, loss of natural capital, traffic congestion, air pollution and possible future decline and deprivation of their neighbourhoods. There is coalescence with surrounding villages such as Langley Burrell and Tytherton Lucas, destroying their place in the environment. Do the opinions of and the impacts upon the people who live here count for so little? Is that what localism has now become?

Chippenham Town Council, the key representative body for the people of Chippenham, has rejected the Local Plan. Both Chippenham and Calne Town Councils have rejected the road. Residents speaking at Chippenham Town Council's Planning, Environment and Transport Committee meeting on 18<sup>th</sup> February 2021 and at two Extraordinary Town Council meetings (one on the Local Plan on 25<sup>th</sup> February, the other on the HIF Bid road proposals on 4<sup>th</sup> March) all spoke against both the Plan and the Road for the full half hour of public question time on all three occasions. Residents through their councillors in neighbouring Bremhill Parish and Calne Town also opposed this plan in its entirety. No residents have been asked what they want their town to look like in the future. A petition against the distributor road has already attracted around 5,500 signatures and growing. What does it take to get Wiltshire Council to listen to its residents?

Wiltshire Councillor and Chippenham Resident

9<sup>th</sup> March 2021

**STRAT364**

**WILTSHIRE LOCAL PLAN CONSULTATION  
COTSWOLDS CONSERVATION BOARD COMMENTS  
9 MARCH 2021**



**CONTENTS**

EMERGING SPATIAL STRATEGY .....	1
EMPOWERING LOCAL COMMUNITIES .....	7
ADDRESSING CLIMATE CHANGE AND BIODIVERSITY NET GAIN .....	10

**EMERGING SPATIAL STRATEGY (COTSWOLDS CONSERVATION BOARD COMMENTS)**

**Introduction**

Paragraph 1.1 and Footnote 1

Paragraph 1.1 states that ‘forecasts predict Wiltshire will need between 40,840 and 45,630 new homes over the plan period of 2016 to 2036’. Footnote 1 clarifies that 40,840 homes is the minimum required by Government using its current standard method.

We acknowledge that the government’s ‘standard method’ is the starting point for identifying housing need in a local authority area. However, we are very concerned about the potential conflation of ‘housing need’ and ‘housing requirement’. Paragraph 1.1 (and, to some degree, the rest of the consultation document) creates the impression that the housing need figure identified through the standard method has to be accommodated regardless of any other considerations. This should not be the case.

The Government has recently provided useful clarification on this issue:<sup>1</sup>

- *Within the current planning system the standard method does not present a ‘target’ in plan-making, but instead provides a starting point for determining the level of need for the area, and it is only after consideration of this, alongside what constraints areas face, such as the Green Belt, and the land that is actually available for development, that the decision on how many homes should be planned for is made. It does not override other planning policies, including the protections set out in Paragraph 11b of the NPPF or our strong protections for the Green Belt. It is for local authorities to determine precisely how many homes to plan for and where those homes most appropriately located. In doing this they should take into account their local circumstances and constraints.*
- *We heard suggestions in the consultation that in some places the numbers produced by the standard method pose a risk to protected landscapes and Green Belt. We should be clear that meeting housing need is never a reason to cause unacceptable harm to such places.*

This clarification reflects the Government’s guidance on Housing and Economic Land Availability Assessment.<sup>2</sup> For example, this guidance allows for the fact that consideration of constraints, such as Green Belt and AONBs, may mean that the housing requirement figure is less than the identified housing need figure:

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<sup>1</sup> [Government response to the local housing need proposals in “Changes to the current planning system” - GOV.UK \(www.gov.uk\)](http://www.gov.uk)

<sup>2</sup> [Housing and economic land availability assessment - GOV.UK \(www.gov.uk\)](http://www.gov.uk)

- Paragraph 025: *If there is clear evidence that strategic policies cannot meet the needs of the area, factoring in the constraints, it will be important to establish how needs might be met in adjoining areas through the process of preparing statements of common ground, and in accordance with the duty to cooperate. If following this, needs cannot be met then the plan-making authority will have to demonstrate the reasons why as part of the plan examination.*

It is also important to note Planning Practice Guidance for development in AONBs, which states that:<sup>3</sup>

- The NPPF’s policies for protecting these areas may mean that it is not possible to meet objectively assessed needs for development in full through the plan-making process.
- AONBS are unlikely to be suitable areas for accommodating unmet needs from adjoining (non-designated) areas.

These considerations are particularly important in a local authority area like Wiltshire, where approximately 44% of the area is located in AONBs<sup>4</sup>, with an additional substantial area being located within the setting of these AONBs. They are also important considerations with regards to the large area of Green Belt that extends from Trowbridge and Corsham (i.e. the Western Wiltshire Green Belt).

Before assuming that the housing provision in Wiltshire will match (or exceed) the housing need figure identified through the standard method, Wiltshire Council should first identify whether this housing need figure is actually achievable, taking into account relevant constraints.

### **Growth and Climate Change**

The Cotswolds Conservation Board acknowledges the climate change emergency and the need to mitigate and adapt to climate change. The need to address climate change is reflected in the Cotswolds AONB Management Plan 2018-2023<sup>5</sup> and in the Board’s Climate Change Strategy<sup>6</sup>.

In principle, the Cotswolds Conservation Board supports the aim to focus growth on the main settlements as a means of helping to address climate change (for the reasons outlined in the ‘Climate Change outcomes’ box on page 4 of the consultation document).

In principle, we also support growth in rural settlements to meet local needs, especially with regards to affordable housing and local services.

Please see our comments below, relating to ‘Delivering the Spatial Strategy’ for further relevant information.

### **Delivering the Spatial Strategy**

In principle, the Cotswolds Conservation Board supports the ‘Delivery Principles’ outlined on page 6 of the consultation document.

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<sup>3</sup> [Natural environment - GOV.UK \(www.gov.uk\)](https://www.gov.uk). Paragraph 041.

<sup>4</sup> There are three AONBs that overlap with Wiltshire – the Cotswolds National Landscape, Cranborne Chase AONB and North Wessex Downs AONB.

<sup>5</sup> <https://www.cotswoldsaonb.org.uk/wp-content/uploads/2018/12/Management-Plan-2018-23.pdf>. Particularly Policies CC7 (Climate Change – Mitigation) and CC8 (Climate Change – Adaptation).

<sup>6</sup> <https://www.cotswoldsaonb.org.uk/wp-content/uploads/2020/02/Climate-Change-Strategy-adopted-June-2012.pdf>

However, given that 44% of Wiltshire is located in AONBs (with a significant additional area being located within the setting of the AONBs), we recommend that the Delivery Principles should also set out delivery principles for development in the AONBs and their settings.

- Development in the AONBs and their settings should be compatible with and, ideally, make a positive contribution to conserving and enhancing the natural beauty of the AONBs.
- Development in the AONBs, particularly housing, should be based on robust evidence of needs arising within the AONBs.<sup>7</sup>

If these principles are not applied, this would undermine:

- the statutory purpose of designation;
- the principle that safeguarding Areas of Outstanding Natural Beauty (AONBs) is in the national interest;
- the aspirations and goals of the Government's 25 Year Environment Plan;<sup>8</sup>
- the proposals of the Government-commissioned Landscapes Review Final Report;<sup>9</sup>
- the vision, outcomes, ambitions and policies of the Cotswolds AONB Management Plan;<sup>10</sup>
- efforts to restore and enhance the natural beauty of the Cotswolds National Landscape;
- the Government's assertions that: (i) meeting housing need is never a clear reason to cause unacceptable harm to protected landscapes;<sup>11</sup> and (ii) our Areas of Outstanding Natural Beauty (AONBs) will be protected as the places, views and landscapes we cherish most and passed on to the next generation.<sup>12</sup>

National planning policy and guidance helps to address this issue by making it clear that:

- great weight should be given to conserving and enhancing landscape and scenic beauty in AONBs, which, together with National Parks and the Broads, have the highest status of protection in relation to these issues;<sup>13</sup>
- the scale and extent of development in AONBs should be limited;<sup>14</sup>
- planning permission should be refused for major development other than in exceptional circumstances and where it can be demonstrated that the development is in the public interest;<sup>15</sup>

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<sup>7</sup> This reflects Policy CE12 (Development Priorities and Evidence of Need) in the Cotswolds AONB Management Plan 2018-2023.

<sup>8</sup> The Government's 25 Year Environment Plan ([link](#)) aspires for us to be the first generation to leave the environment in a better state than we found it. As part of this aspiration, it proposes to embed an 'environmental net gain' principle for development. In addition, it sets a goal that '*we will conserve and enhance the beauty of our natural environment ... by ... safeguarding and enhancing the beauty of our natural scenery and improving its environmental value while being sensitive to considerations of its heritage*'.

<sup>9</sup> The 'Landscapes Review Final Report' ([link](#)) sets out 27 proposals relating to our protected landscapes, including stronger purposes in law for our 'national landscapes' (proposal 23) and for AONBs to be strengthened with new purposes, powers and resources (proposal 24).

<sup>10</sup> Cotswolds Conservation Board (2018) *Cotswolds AONB Management Plan 2018-2023* ([link](#)).

<sup>11</sup> Government response to the local housing need proposals in 'Changes to the current planning system' – updated 16 December 2020 ([link](#)).

<sup>12</sup> Statement by the Secretary of State for Housing, Communities and Local Government, when launching the consultation on the Planning White Paper in August 2020 ([link](#)).

<sup>13</sup> National Planning Policy Framework (NPPF) ([link](#)): paragraph 172.

<sup>14</sup> NPPF ([link](#)): paragraph 172. See also Appendix 9 of the Cotswolds AONB Management Plan 2018-2023.

<sup>15</sup> NPPF: paragraph 172 ([link](#)).

- policies for protecting AONBs may mean that it is not possible to meet objectively assessed needs for housing and other development in full;<sup>16</sup>
- AONBs are unlikely to be suitable areas for accommodating unmet needs arising from adjoining, non-designated areas.<sup>17</sup>

## **Formulating the Spatial Strategy**

### Paragraph 2.17, page 7 (Housing Need)

Please refer to our comment on paragraph 1.1 of the consultation document, relating to housing need.

## **Emerging Spatial Strategy**

### Brownfield Land

In principle, we support the priority given to re-developing brownfield land as this helps to reduce the extent to which greenfield land needs to be developed.

However, some brownfield sites have a high biodiversity value, particularly with regards to rare invertebrate species and the priority habitat ‘open mosaic habitat on previously developed land’. Care should be taken to ensure that this biodiversity resource is conserved and enhanced.

Care should also be taken with the redevelopment of decommissioned airfields in the AONBs and their settings. In the Cotswolds National Landscape, such airfields are one of the key features of Landscape Character Type (LCT) 9 (High Wold Dip Slope). Colerne Airfield is one such example. The Cotswolds AONB Landscape Strategy & Guidelines for LCT 9 states that:

- *In view of the brownfield status of decommissioned airfields, they are particularly susceptible to proposals for new large-scale development that has the potential to have a widespread impact on landscape character and visual amenity over large areas of the surrounding landscape. Such sites may offer some capacity for development, however, due to the established use of existing development, but nevertheless require careful site planning and mitigation.*<sup>18</sup>

Section 9.5 of that document provides guidelines on how to avoid and minimise adverse impacts associated with re-using decommissioned airfields, including for residential, industrial and solar farm uses. Any relevant allocations and / or development proposals should be compatible with these guidelines.<sup>19</sup>

## **Housing Market Areas**

### Development at settlements within the setting of AONBs

None of the principal settlements or market towns in are located in the three AONBs that overlap with Wiltshire. However, many of them are located within the setting of the AONBS (as outlined below, in relation to the Cotswolds National Landscape).

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<sup>16</sup> Planning Practice Guidance – Natural Environment: paragraph 41 ([link](#)).

<sup>17</sup> Planning Practice Guidance – Natural Environment: paragraph 41 ([link](#)).

<sup>18</sup> <https://www.cotswoldsaonb.org.uk/wp-content/uploads/2017/07/lct-9-high-wold-dip-slope-2016.pdf>

<sup>19</sup> As specified in Policy CE10 of the Cotswolds AONB Management Plan 2018-2023 ([link](#)).

Guidance on development in the setting of AONBs is provided in:

- the Board’s Position Statement on ‘Development in the Setting of the Cotswolds AONB’;<sup>20</sup> and
- the Government’s Planning Practice Guidance on development in the setting of protected landscapes.<sup>21</sup>

In particular, when considering potential allocations or development proposals in the setting of the AONBs, it is important to consider potential impacts of the proposed development on the AONBs, including impacts on:

- views from and to the AONBs;<sup>22</sup>
- the tranquillity of the AONBs – noise / increase in traffic levels (inc. significance of 10%+ increase in traffic levels);<sup>23</sup>
- the dark skies of the AONBs – light pollution / introduction of lit elements into dark landscapes;<sup>24</sup>
- the landscape character of land adjoining AONBs, where this landscape character is complementary to that of the AONB.

Relevant case law has clarified that great weight should be given to the impact of development outside an AONB on views from the AONB.<sup>25</sup> This great weight does not apply to impacts on views from outside an AONB looking towards the AONB. However, other factors, such as important views identified in a Neighbourhood Development Plan, might increase the weight given to such views.

The dark skies and tranquillity of the AONBs are also two of the AONB ‘special qualities’ (for the Cotswolds National Landscape, at least). Whilst important considerations in their own right, they are also an integral part of the landscape character of an area. As such, impacts on the dark skies and tranquillity of the AONBs should also be given great weight.

The main settlements in the setting of the Cotswolds National Landscape and important considerations relating to these settlements are outlined below:<sup>26</sup>

- Chippenham Housing Market Area:
  - **Corsham:** The built environment of Corsham currently extends to within approximately 600m of the Cotswolds National Landscape boundary; the main road through Corsham (the A4) continue through the National Landscape towards Bath.
  - **Chippenham:** The built environment of Chippenham currently extends to within approximately 2.7km of the Cotswolds National Landscape boundary – this could potentially be an issue for any new large development proposals to the west of the

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<sup>20</sup> <https://www.cotswoldsaonb.org.uk/wp-content/uploads/2017/08/setting-position-statement-2016-adopted-with-minor-changes-30616-1.pdf>

<sup>21</sup> <https://www.gov.uk/guidance/natural-environment#landscape>. Paragraph 042.

<sup>22</sup> See also Policy CE1 (Landscape) of the Cotswolds AONB Management Plan 2018-2023 which specifies that development proposals should ensure that views - including those into and out of the AONB – are conversed and enhanced.

<sup>23</sup> See also Policy CE4 (Tranquillity) of the Cotswolds AONB Management Plan 2018-2023 and the Board’s Tranquillity Position Statement ([link](#)).

<sup>24</sup> See also Policy CE5 (Dark Skies) of the Cotswolds AONB Management Plan 2018-2023 and the Board’s Dark Skies & Artificial Light Position Statement ([link](#)) and its appendices A ([link](#)), B ([link](#)) and C ([link](#)).

<sup>25</sup> Stroud District Council v Secretary of State for Communities and Local Government v Gladman Developments Limited [2015] EWHC 488 (Admin) ([link](#))

<sup>26</sup> Similar considerations will need to be taken into account with regards to settlements in the setting of the other two AONBs.

A350; two of the main road in Chippenham (the A4 and the A420) continuing through the National Landscape towards Bath and Bristol, respectively.

- **Malmesbury:** The built environment of Malmesbury is directly adjacent to the Cotswolds National Landscape boundary; the statement in the Government's Planning Practice Guidance that AONBs '*are unlikely to be suitable areas for accommodating unmet needs from adjoining (non-designated) areas*' will be particularly relevant here.<sup>27</sup>
- Trowbridge Housing Market Area:
  - **Bradford on Avon:** The built environment of Bradford on Avon is directly adjacent to the Cotswolds National Landscape boundary; the statement in the Government's Planning Practice Guidance that AONBs '*are unlikely to be suitable areas for accommodating unmet needs from adjoining (non-designated) areas*' will be particularly relevant here.<sup>28</sup>
  - **Trowbridge:** The built environment of Trowbridge currently extends to within approximately 2.4km of the Cotswolds National Landscape boundary – this could potentially be an issue for any new large development proposal to the north-west of Trowbridge.

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<sup>27</sup> <https://www.gov.uk/guidance/natural-environment#landscape>. Paragraph 041.

<sup>28</sup> <https://www.gov.uk/guidance/natural-environment#landscape>. Paragraph 041.

## EMPOWERING LOCAL COMMUNITIES (COTSWOLDS CONSERVATION BOARD COMMENTS)

### Affordable Homes

**Q. Do you agree there should be a target of 40% affordable homes on all new schemes of more than five dwellings in the rural area? What other approaches might there be?**

The Cotswolds Conservation Board acknowledges that a target of 40% affordable homes is an improvement on the 30% target that is currently required in some parts of Wiltshire. However, in the AONBs, we would encourage Wiltshire Council to consider setting a target of 50% affordable homes.

We also acknowledge that the proposal to apply this target to all new schemes of more than five dwellings is more stringent than in some local authority areas. However, the National Planning Policy Framework (NPPF) allows for the provision of affordable housing for schemes of five units or fewer. In the AONBs, we would encourage Wiltshire Council to consider applying this target to schemes of two or more units.

Combining these two elements together, for housing developments in the AONBs we would encourage Wiltshire Council to consider setting a target of 50% affordable housing on all new schemes of two or more dwellings. This reflects best practice in development plans that relate to other protected landscapes, such as the Arnside & Silverdale AONB Development Plan Document (DPD).<sup>29</sup>

The natural beauty of AONBs means that they are desirable places to live. This contributes to elevated house prices compared to surrounding non-designated areas. These elevated house prices mean that housing in the AONBs is even more out of the reach of those most in need of affordable housing.

This is particularly important given that many of the jobs that are essential to conserving and enhancing the natural beauty of AONBs – and to furthering the economic and social wellbeing of local communities within AONBs - are relatively low paid. These workers, especially young people, are being priced out of the housing market in the landscapes and communities that depend on them.

Having a higher percentage of affordable housing for all scales of development in AONBs also reflects Policy CE12 of the Cotswolds AONB Management Plan 2018-2023, which prioritises affordable housing. It also reflects the Government's 'vision' for national parks which specifies that '*the expectation is that new housing will be focussed on meeting affordable housing requirements*'.<sup>30</sup>

Having a higher percentage of affordable housing, where this affordable housing primarily meets local needs, would also help to limit the scale and extent of development in the AONBs, as required in paragraph 127 of the NPPF.

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<sup>29</sup> <https://www.lancaster.gov.uk/planning/planning-policy/arnside-and-silverdale-aonb-dpd>. Policy AS03 – Housing Provision.

<sup>30</sup> Defra (2010). *English National Parks and the Broads. UK Government Vision and Circular 2010* (link). N.B. Although this document relates to National Parks and the Broads – not AONBs – the Board takes the view that the extracted text is relevant to all protected landscapes. This is because National Parks and AONBs both have the highest status of protection in the NPPF. Also, the NPPF and PPG now explicitly state that the scale and extent of development in AONBs should be limited.

## **Rural Exception Sites and Community-Led Housing**

### **Q. Do you agree with the approach set out in the suggested revised Core Policy 44? If not, why not? How could it be improved?**

The Cotswolds Conservation Board supports the criteria specified for rural exception sites as these criteria reflects most of the principles that the Board advocates for such sites.

We are pleased to see that the policy sets a maximum of 25% market housing on rural exception sites. This should help to avoid the scenario that has arisen in other parts of the Cotswolds National Landscape where such sites have provided up to 49% market housing, which we consider to be completely inappropriate.

It would be helpful if the policy explicitly stated that the starting point, when considering such sites, should be 100% affordable. This would help to reinforce the primary purpose of such sites.

We are also pleased to see the criteria relating to the size of rural exception sites (i.e. 20 dwellings or fewer and no greater than 5% of the size of the settlement) – we consider this to be an appropriate interpretation of the requirement for such sites to be ‘small’.

It would be helpful if this requirement was expanded to state:

- (i) 20 dwellings or fewer and (ii) no greater than 5% of the size of the settlement or no greater than 5% of the number of dwellings in the settlement, whichever is less.

This will help to set a limit on the number of dwellings, in addition to the limit on the size of the scheme.

## **Housing Requirements for Neighbourhood Area Designations in the Rural Area**

### **Q: 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?**

The Cotswolds Conservation Board considers that the four bullet points, which set out the way in which housing requirements for Local Service Centres and Large Villages, will be met are appropriate.

We also support the general presumption against housing proposals outside a settlement.

We acknowledge that some level of housing development may be appropriate in AONB settlements. However, we are concerned that the methodology for identifying housing provision in each settlement does not adequately address the specific circumstances of the individual location (such as landscape character and visual sensitivity). In addition, the 100m buffer that has been used does not adequately address issues such as views (both to and from settlements) that extend beyond this 100m buffer.

When considering potential site allocations for settlements in the AONBs and their settings, we recommend that a Landscape and Visual Sensitivity and Capacity Study should be undertaken, with sites / land parcels that are identified as having a high or medium-high sensitivity being ruled out.

For potential allocations for settlements within the AONBs, we recommend that:

- potential impacts on the factors<sup>31</sup> that contribute to the natural beauty of the AONBs should be assessed;
- the allocations should be assessed to see if they constitute major development, in the context of paragraph 172 of the NPPF, particularly allocations of 10 or more dwellings - potential allocations that are considered to be major development should be ruled out.<sup>32</sup>

Further advice on these recommendations is provided in the Board's draft Planning & Development Position Statement, which Wiltshire Council has been consulted on.

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<sup>31</sup> In addition to landscape quality and scenic quality, these factors also include tranquillity (including dark skies), natural heritage (including biodiversity) and cultural heritage (including historic environment).

<sup>32</sup> Such allocations should only be considered if Wiltshire Council is satisfied that (i) there are exceptional circumstances, and (ii) it is demonstrated that, despite giving great weight to conserving the landscape and scenic beauty in the AONB, the development is in the public interest,

## **ADDRESSING CLIMATE CHANGE AND BIODIVERSITY NET GAIN (COTSWOLDS CONSERVATION BOARD COMMENTS)**

### **Context**

The Cotswolds Conservation Board acknowledges the climate change emergency and the need to mitigate and adapt to climate change. The need to address climate change is reflected in the Cotswolds AONB Management Plan 2018-2023<sup>33</sup> and in the Board's Climate Change Strategy<sup>34</sup>.

### **Policy Theme 1 – Tackling Flood Risk and Promoting Sustainable Water Management**

The Board supports the measures proposed to address this issue.

### **Policy Theme 2 – Enhancing Green/ Blue Infrastructure (GBI) and biodiversity**

In principle, the Board supports the measures proposed to address this issue.

However, we do not consider that the proposed measures (or the document as a whole) goes far enough to address the ongoing, massive declines in biodiversity at a global, national and local level. Addressing biodiversity loss requires a comprehensive set of measures, of which delivering biodiversity net-gain is just one component.

One of the most important measures is for existing wildlife sites to be protected, in line with national policy and guidance, and for these sites to be brought into good condition through effective and appropriate management. In principle, development should not impact on international, national and, ideally, local nature conservation designations. The biodiversity net-gain mechanism should not be used in a way that allows for development to harm these designations.

A key omission from the consultation document is any reference to Local Nature Recovery Strategies (LNRS). LNRS will soon be one of the key mechanisms for helping to halt and reverse declines in biodiversity at the local level. Development should be required to make a positive contribution to LNRS.

### **Policy Theme 3 – Sustainable Design and Construction in the Built Environment**

The Board supports measures to reduce greenhouse gas emissions from new development (and, retrospectively, from existing development).

The main focus should be on reducing greenhouse gas emissions at source, rather than relying on offset mechanisms such as off-site renewable energy schemes.

Within the AONBs and their settings, such measures should, ideally, be implemented in a way that is compatible with – and positively contributes to – the purpose of AONB designation. For example, such measures should be sensitive to the local distinctiveness of the built environment.

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<sup>33</sup> <https://www.cotswoldsaonb.org.uk/wp-content/uploads/2018/12/Management-Plan-2018-23.pdf>. Particularly Policies CC7 (Climate Change – Mitigation) and CC8 (Climate Change – Adaptation).

<sup>34</sup> <https://www.cotswoldsaonb.org.uk/wp-content/uploads/2020/02/Climate-Change-Strategy-adopted-June-2012.pdf>

The Board's guidance for householders on energy efficiency and generation measures suitable for traditionally constructed buildings in the Cotswolds AONB is a good example of this approach.<sup>35</sup>

#### **Policy Theme 4 – Sustainable Energy Generation and Management**

With regards to the Cotswolds National Landscape and its setting, the Board supports the use of small-scale forms of renewable energy that are compatible with the purpose of AONB designation. Further information on this issue is providing in the Board's Renewable Energy Position Statement.<sup>36</sup>

We recommend that the Local Plan should identify 'suitable areas' for renewable and low-carbon energy, particularly wind and solar energy. Ideally, this should be implemented for the whole of the Wiltshire Council area, in order to obtain a strategic-level, spatial understanding of potential opportunities. These suitable areas can then potentially be refined at the Neighbourhood Development Plan stage.

We recommend that the process for identifying suitable areas should include:

- a Landscape and Visual Sensitivity and Capacity Study (LVSCS), which takes account of the high landscape value accorded to the AONB designation – land parcels / sites that are identified as having high or medium-high sensitivity should be ruled out;<sup>37</sup>
- identifying key constraints and creating a buffer zone around these constraints.<sup>38</sup>

#### **Policy Theme 5 - Sustainable Transport and Air Quality**

In principle, the Board supports measures that reduce the need to travel, reduce car use and encourage more sustainable modes of transport.

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<sup>35</sup> <https://www.cotswoldsaonb.org.uk/wp-content/uploads/2019/08/Energy-Guide-June-2014.pdf>

<sup>36</sup> <https://www.cotswoldsaonb.org.uk/wp-content/uploads/2017/08/renewable-energy-ps-2014-final-apr2014.pdf>. This position statement will be reviewed in 2021, with the intention of the Board adopted an updated version in early 2022.

<sup>37</sup> Other than in exceptional circumstances and where it can be demonstrated that the development is in the public interest.

<sup>38</sup> Relevant constraints would include nature conservation designations, historic environment designations and public rights of way.

**STRAT367**

## **Draft Wiltshire Local Plan Consultation 2021**

### **Representation by Persimmon Homes (South Coast)**

09/03/2021

## **INTRODUCTION**

1. Persimmon Homes (South Coast) welcomes the opportunity to comment on the Regulation 18 Wiltshire Local Plan Review Consultation 2021. The South Coast office operates in the Southern part of Wiltshire (roughly the defined Salisbury Housing Market Area (HMA)). Persimmon Homes (Wessex) cover the remaining parts of Wiltshire and Swindon; the Wessex office may provide comments separately on the draft Plan.
2. Persimmon (South Coast) has a number of sites with the Salisbury Housing Market Area which it is promoting for residential development. The draft Local Plan has identified Downton Road Salisbury (Site 6), which is in Persimmon's Control, for an allocation of 275 dwellings. Persimmon's Fugglestone Red site is identified in the Plan as a committed site. The Company is of the view, however, that the employment element of the site, which does not yet have detailed consent, could be reconsidered for mixed use residential led development. Subject to the detailed comments on the policies elsewhere in these representations, the Company firmly supports the identification of the Persimmon sites in the Plan, and we look forward to positive working with the Council to deliver the sites going forward.
3. Persimmon also has interests in Salisbury Road, Downton site which has not been selected for allocation in the draft Plan. It is Persimmon view that this site should also be allocated in the emerging Plan. Persimmon Homes has produced Site Deliverability Statements for the Salisbury Road, Downton site (and the Downton Road, Salisbury site), which should be read alongside these representations. The Statements demonstrate that the both sites are sustainable and deliverable development opportunities that can be brought forward in the short term.

## **STURCTURE OF THE REPRESENTATIONS**

4. The Local Plan consultation focusses on the distribution and level of growth across the Plan area and also sets out the Council proposal for addressing climate change and biodiversity net gain. The consultation comprise a number of separated reports, each focussing on a specific settlement area or area/topic. In light of the South Coast office's area of operation, these representations have been limited to commenting on the following reports:
  - Emerging Spatial Strategy (page 2)
  - Planning for Salisbury Report and the associated Salisbury Site Selection Report (page 5)
  - Empowering Rural Communities (page 10)
  - Addressing Climate Change and Biodiversity Net Gain (page 12)
5. Where relevant, commentary is also made in the evidence base documents that support these reports, including the Sustainability Appraisal and Habitats Regulations Assessment.

## **EMERGING SPATIAL STRATEGY**

6. The Emerging Spatial Strategy report, sets out information relating to the proposed distribution of growth around the county across the plan period. This is expressed in terms of the amount of new homes and land for employment that each main settlement should accommodate.

### Plan Period

7. The Wiltshire Local Development Scheme (LDS) states that the Local Plan is due to be adopted in 2023. The Council will be aware that the National Planning Policy Framework (NPPF) states that strategic policies should look ahead over a minimum of 15 years from adoption. On this basis the Council's Plan should run to at least 2038, not to 2036 as set out in the emerging Plan. The plan horizon should be extended by at least two years if it is to meet the requirements of the NPPF. As discussed below, this will have implications for the Local Plan housing requirement, and may necessitate uplifts to HMA housing need figures and those of individual settlements.

### Housing Needs and Requirements

8. The Council's sets out two figures for housing need: a minimum figure of 40,840 (based on Standard Method) and higher figure of 45,630 (based on the Council's own Local Housing Need Assessment). This is equivalent to between 2,042 – 2,282 dpa new homes to be delivered each year of the plan period.
9. According to the Spatial Strategy report, the second, Council derived figure, applies long-term migration patterns and economic growth forecasts resulting in a higher housing need figure when compared with that of the Standard Method. Persimmon supports the Council approach of uplifting housing numbers to account for relevant factors, as this is supported by the Planning Practice Guidance. However, further adjustments may be needed to this figure as a result of Duty to Co-operate discussion and affordability considerations, for example. With regards to economic adjustments to the Standard Methodology, the Council's report makes reference to the Local Housing Need Assessment (2019) which sets out this evidence for this adjustments. However, it is not clear from document or the Spatial Strategy document how many dwellings have been added. The same is true for the economic growth adjustment which draws on the Swindon and Wiltshire Functional Economic Market Assessment (2016) evidence base, which is over 5 years old and will not account for recent changes in demand for employment floor space, new working practices (as a result of COVID 19, for example) and changes to planning context (i.e. revisions to the business use class order). The Spatial Strategy report should clearly set out the justification and evidence for the uplift that has been applied so this can be interrogated. Until such time as the Council has published this information, Persimmon must reserve comment on whether the housing uplift as proposed by the Council is appropriate.
10. Notwithstanding our comments on the appropriateness of the uplift, in light of the earlier comments made regarding the plan period, the housing requirement for Wiltshire County should be a range of at least between 44,924 and 50,194.

### Employment Needs and Requirements

11. The Spatial Strategy makes reference to employment needs but we have been unable to work out from the evidence base where this need figure has been derived. A background paper setting out the employment evidence and approach to the distribution of employment needs across HMAs and individual settlements would be beneficial.

### Housing Market Areas

12. Similar to the adopted Core Strategy, the Plan sets out four Housing Market Areas (HMAs) (i.e. Salisbury, Swindon, Chippenham and Trowbridge) which have informed the distribution of growth across the County. Retaining the four HMAs is supported as it represents a sensible means distributing growth across a large plan area, and for monitoring (including five year housing land supply). It is unclear from the Plan whether the Council intend to monitor housing delivery/supply at the HMA level or across the Wiltshire area as a whole. For reasons set out above, the former approach is supported.

### Alternative Development Strategies

13. The Council has considered a number of development strategies for each of the HMA areas in order to determine the amount of growth that will be directed to each area and the settlements within these area. These options have been the subject of Sustainability Appraisal, which is necessary.

### Settlement Hierarchy

14. As part of the Plan review, the Council has reviewed the settlement hierarchy. In terms of the Southern HMA, Salisbury continues to be identified as a 'Principal Settlement' and is described in the plan as the primary focus for development providing significant levels of jobs and homes. This identification of Salisbury as a tier 1 settlement is supported by Persimmon as this correctly recognises the City's sub-regional importance. It is also noted that Wilton will be considered in the new Plan as its own distinct settlement, separate from Salisbury. Similarly, Amesbury, Bulford and Durrington are also considered as separate settlements in the new Plan (as opposed to a single settlement). Planning for the strategic requirements of these towns separately is supported by Persimmon as this allows for the consideration of the individual growth needs of distinct settlements to be considered and for local housing needs to be better addressed.

### Salisbury Housing Market Area

15. As set out in the Spatial Strategy report, the development strategy for the Salisbury HMA constitutes a roll forward of existing Core Strategy development strategy (SA Option A). The Report states that for SA Option, housing and employment land requirements are reduced by 11% and distributed pro-rata rolling forward the current development strategy. The Salisbury HMA: Formulating Alternative Development Strategies Report (January 2021) states that the 11% reduction is due to differences in overall housing requirement for the Salisbury HMA compared with current needs assessment, the housing requirement, set out in the Core Strategy. Given our comments above with regards to the appropriateness of higher housing target figure (i.e. does not include all possible uplifts), it is not possible to comment on whether this 11% reduction is appropriate. Allied to this is the fact that the Council is comparing the 'policy on' housing *requirement* figure in the Core Strategy with the 'policy-off' housing *needs* figure - the two figures are not directly comparable.

16. Notwithstanding this concern, the strategy selected by the Council which focusses growth on Salisbury (and to a lesser extent on Amesbury and Tidworth/Ludgershall) is broadly supported.

#### Brownfield Land and Targets

17. Appendix 1 of the Spatial Strategy report sets out proposals for the introduction of new policy to help ensure as many homes as possible are built using previously developed land within the urban areas of main settlements. Persimmon recognises the important role that previously developed land can play in delivering the growth ambitions of an area, and acknowledges provision set out in the NPPF's to use of land effectively. However, the NPPF also requires that sites proposed for allocation must be deliverable/developable. As is often the case, brownfield sites, can be subject to significant deliverability issues including existing uses, land assembly / ownership, contamination, viability and other issues that can often render brownfield sites undeliverable. The Council must ensure that its assessment of brownfield sites is robust and realistic so it does not place undue reliance on brownfield sites coming forward to meet requirements.
18. With regards to a specific target for brownfield land, this is not supported by Persimmon Homes nor by national planning policy. When introducing the NPPF, the Government decided not to carry forward the brownfield target that once formed part of Planning Policy Statement 3: Housing. In Permission view, the introduction of a brownfield target policy would be a retrograde step that does not reflect current national planning policy requirement.
19. Appendix 1 of the Report implies that the delivery of brownfield sites at a settlement should have a bearing on the amount of greenfield land that is released. If an area is not meeting its brownfield target, this should not be used as justification for restricting or slowing / phasing greenfield developments. This approach does not represent positive planning as is required by the NPPF, and cannot be supported by Persimmon. Should a particular settlement overprovide housing against its brownfield targets (or overall housing requirements for that matter), this should be viewed positively by the Council as a means of significantly boosting housing supply, and not be viewed as a means to frustrate development. The Council should also be aware that changing delivery phasing could have significant unforeseen contractual issues for some development sites.
20. Rather than setting brownfield policy targets, the Council has a number of other more appropriate tools at its disposal that it can draw upon to encourage brownfield sites to come forward including: identifying such land as specific allocations in the Development Plan, effective use of the brownfield registers and permission in principle processes and appropriate consideration of windfall allowances (which are often on brownfield development site) in supply assessments. The Council can also take proactive steps including working with developers through the planning application process to support challenging brownfield development proposals, which may include reconsidering development parameters (including development density).
21. Paragraph 6 and 26-29 of Appendix 1 states that brownfield targets will be the basis for housing requirements for designated neighbourhood plan areas at main settlements. The Council setting housing targets for neighbourhood plan areas is to be welcomed, as the

approach is supported in the NPPF. However, brownfield land availability should not be the only primary basis for determining for housing requirements. Whilst brownfield land availability is a helpful indicator of the quantum of housing that *could* be delivered, it does not allow for considerations of what *should* be delivered. To remedy this, the Council should have regard to Paragraph: 101 Reference ID: 41-101-20190509 of the Planning Practice Guidance that directs local planning authorities to consider other factors such as the characteristics of the neighbourhood area, population and role the settlement's in providing services. It is also considered that completions on brownfield land, may be a more reliable indicator of future brownfield potential rather than committed sites that may not come forward or where planning permission may lapse. It is also noted that, due to delivery challenges, lapse rates for planning permission on brownfield land tend to be higher than that of greenfield sites.

22. Notwithstanding our fundamental concerns regarding brownfield targets, in terms of the policy detail, it is not necessary to set a specific time period for the target to be assessed (the Report sets out a period of 2021 -2031). The quantum of development on previously development land could be monitored annually as part of the Council monitoring framework for the Local Plan, and any policy review action as part of the statutory five year review of local plans. With specific reference to Salisbury, the brownfield target for the City is 410 homes to be delivered in the period 2021-31. This represents nearly half of the overall residual housing requirement (940 homes) for Salisbury across the entire plan period. When viewed in this context, the Council's brownfield target is too high and is unlikely to be achievable.

### **PLANNING FOR SALISBURY**

23. The Planning for Salisbury report sets out the scale of growth, priorities and sites to meet growth needs. The following section of these representations sets out Permission's comments in relation to housing and employment needs and the sites within Salisbury that are being promoted by the Company for residential development.

#### **Housing Needs**

24. The Planning for Salisbury report sets out a housing requirement of 5,240 new homes to be delivered in the plan period 2016-2036 (or 940 new homes if committed sites are included). However, in light of our comments, in the Spatial Strategy section in respect of the plan period and potential adjustments to housing needs, this housing requirement is likely to be too low. It is also unclear why this figure is not expressed as a range as per the County and HMA housing need figures.
25. With regards to housing supply, the Council has identified three new housing sites in Salisbury to meet needs (detailed commentary on sites 6<sup>1</sup> and 7 is set out below). The three sites have a combined capacity of 610 new homes, which leaves 330 new homes still to be found when considered against the 940 new homes residual housing requirement for Salisbury. Paragraph 30 of the Salisbury Report anticipates that this shortfall will be picked

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<sup>1</sup> Site 6: North of Downton Road is controlled by Persimmon Homes (South Coast)

up through the emerging Salisbury Neighbourhood Plan (SNP) and the Central Area Framework (CAF).

26. The CAF, however, is not an allocations plan so there can be no certainty that this document will bring forward new sites over and above those already identified for allocation. With regards to the SNP, the Steering Group Agreed Site Allocation Report (February 2021) identifies four sites for allocation in the SNP<sup>2</sup>. The sites, listed in Table 1 below and selected for possible allocation in the SNP, are capable of delivering around 100 homes; this falls considerably below the 330 dwellings that are needed to meet needs in Salisbury. Notwithstanding the above, the sites in Table 1 have potential suitability, availability and/or achievability constraints suggesting that even a combined capacity of 100 new homes may be ambitious. In light of the above, the Council should be cautious in relying on SNP allocations to meet Salisbury’s housing needs.

**Table 1: SNP Preferred Allocation Sites**

Site Address	Area (ha)	Capacity	SHELAA Assessment
18 College Street	0.4	4 dwellings - based on Wiltshire SHELAA 2017	Not suitable. Developable in long term.
22/30 High Street	0.39	4 dwellings - estimated based on above site)	Not assessed in SHELAA.
Gasworks site at Coldharbour Lane	0.86	8 dwellings (estimated based on above site)	Not assessed in SHELAA.
Quidhampton quarry	18.29	100 dwellings - based on developable area of approved planning application 16/05957/FUL	Not assessed in SHELAA.
Brown Street Car Park	0.40	0 dwellings - based on Wiltshire SHELAA 2017	Not suitable. Developable in long term.
<b>Total</b>		<b>108 dwellings</b>	

27. Given the role the City will play in meeting sub-regional housing needs alongside Salisbury’s own local needs, the Council should look to proactively address this shortfall in the Local Plan Review, and not defer allocations to a later Development Plan Document. As a means of addressing the considerable shortfall (at least 200 dwellings), the Council could look to intensify development on proposed sites such as North of Downton Road (Site 6). It could also consider the re-designation of sites for residential uses, for example the employment element of the Fugglestone Red site.

<sup>2</sup> Site 6 was considered in the SNP Site Allocation report but not taken forward for allocation.

### Employment Needs.

28. Based on the Council's current evidence approximately 5 ha of additional employment land are needed up until 2036 to accommodate the growth forecast at Salisbury. It is not clear from the Council's consultation reports and its evidence (Employment Land Review and Functional Economic Market Assessment) how it has arrived at a 5 ha floorspace figure for Salisbury. Until the Council has published this information, Persimmon must reserve comment on whether the employment need for Salisbury is appropriate.

### Place Priorities

29. The Salisbury Report sets out a number of priorities for the City. Persimmon has two development sites in Salisbury (North of Downton Road and Fugglestone Red) that will help the Council meet a number of these objectives including: conserving the landscape setting of Salisbury (including views to / from the cathedral) (priority iii), including maintaining the separation and distinctiveness of settlements (priority iv) and the delivery of new housing (priority v), employment floorspace (priority vi) and infrastructure (priority ix).

### Salisbury Development Sites

30. Persimmon controls two development sites in Salisbury. One site is located to the North of Downton Road, and is identified in the Salisbury Report as 'preferred development site' 6. Persimmon's Fugglestone Red site is identified as a 'planning persimmon / completion' site. This site is under construction, but there remains a number of phases which do not yet have detailed planning permission. These sites are discussed in greater detail below.

### North of Downton Road, Salisbury Development Opportunity

31. This identification of this site by the Council as a preferred development site in the draft Local Plan is firmly supported by Persimmon.
32. The Company would highlight, however, that not all of the Persimmon land is included on the Concept Masterplans. Persimmon controls additional land to the north of the existing Public Right of Way that extends along the northern edge of the site as shown on the Concept Masterplans. This land can play an important role providing drainage, ecology enhancements, landscaping, open space etc., and should therefore be included in the Concept Plan boundaries. Excluding this land will also result in an unnecessary reduction in the developable area. The boundary of the Persimmon land is set out in the Site Deliverability Statement. The Concept Masterplans red line boundaries should be redrawn to include the additional land set out in the Statement.
33. Persimmon has undertaken a number of detailed technical assessments of the site which has informed a draft Masterplan. This work is set out in detail in Persimmon's Site Deliverability Statement for the North of Downton Road site, which should be read along these representations.
34. The Downton Road site, alongside other potential sites in Salisbury, were considered in Council's Site Selection Report for Salisbury. Of the 4 sites selected for allocation (out of 27), the Downton Road is ranked second (see Stage 4 section of the Site Assessment). Persimmon welcomes the Council's positive assessment of the site. The Site Selection Report sets out a number of potential site constraints and policy issues related to the site,

including but not limited to heritage, landscape traffic and infrastructure provision. However, as demonstrated in the Deliverability Document, these constraints are not insurmountable and have been successfully considered as part of the masterplan.

35. The Salisbury Planning Report sets out a series of Concept Masterplans and design principles for the Downton Road site. The design principles are set out below:
- Approximately 220 new homes to include specialist provision
  - Feature of new quarter is Cathedral Vista, a circa 40m wide sightline through the designed scheme to Salisbury's most celebrated landmark
  - Building / parking featuring approx. 2,000 sqm / 80 place Early Years' setting and potentially other community uses (possible GP provision).
  - Nursery and community facilities are valid for both Sites 6 and 7 Walking and cycling links to the nearby Park & Ride, Salisbury District Hospital and the city centre
  - Wider countryside access
  - Open space including play provision,
  - New woodland, tree/hedgerow planting
36. The Masterplan contained in the Deliverability Statement, particularly Option A, broadly conforms to the development principles and Concept Plans sets out in the Salisbury Report. However, there are a number of instances (as detailed below) where the Persimmon's design approach diverges from that of the Council. Persimmon would welcome discussion with officers with a view to resolving these differences to allow the high-quality development to come forward at the site.
37. As a general point, whilst Persimmon recognises the value in the Council producing Concept Plans to test deliverability of sites, we would caution against the use of overly prescriptive plans in planning policy. The Concept Plans set out in the Salisbury Report including detail on development block arrangements, frontage locations, detailed road and right networks and the location of green infrastructure (amongst other items). In Persimmon's view, this detail is not necessary, is inflexible and could stifle site design and challenge site deliverability.
38. There is also a concern that the Concept Plans are not supported by detailed technical assessment. As an example, it is not clear how the Council has determined the location and scale for the SUDs as shown on the plan. As the Council's proposed capacity for the site is based on the land uses set out in the Concept Plan, it is important that the assumptions used in underpinning the disposition of land uses on the Concept Plan are accurate to enable the land to be brought forward efficiently and effectively as is required by national planning policy.
39. It is also noted that Paragraph 42 of the Report states that: '...sites [6 and 7] have been considered together so as to encourage integrated and comprehensive planning and design across these two adjacent parcels.' It is not clear what level of 'integration' is expected and to what extent collaboration between the landowners will be expected. Site 7 is located on the opposite site of Downton Road and is shown as being capable of delivering some 115 new homes alongside an extensive area of open space. The Council should be aware that

Persimmon has approach the owners of these lands with a view to discussing the potential for joint working. Persimmon would welcome further discussions with the Council and the other parties with regards to how the sites can be brought forward successfully.

40. The Deliverability Statement for the Downton Road site submitted by Persimmon demonstrates that it can accommodate around 350 new homes. Considering that the housing needs figure for Salisbury is likely to increase (see comments above), and the Local Plan Review underprovides housing in Salisbury against identified need, the Council may wish to reconsider whether its capacity estimates for the site could be increased so it can accommodate a greater proportion of development.
41. As part of the 275 homes proposed for the site in the draft Plan, there is a requirement for an unknown quantity of these homes to be for self-build and specialist housing. National planning policy and guidance requires that Council's produce evidence (including viability assessment) to support specialist accommodation and self-build allocation policies. However, we have been unable to find such evidence. Until such time as this evidence has been produced and considered, it should not be a requirement for strategic sites, including Downton Road, to provide for these types of development. Notwithstanding our overriding concerns, should the Council continue with this policy requirement, it will be necessary for the Local Plan to define what proportion / quantum of units would be expected.
42. Persimmon do not object to principle of including new nursery and GP provision on the site, but this must be underpinned by evidence of need. The same is true for the new allotments to the west of the site. The design principles also set out a potential requirement for other community uses but, aside from GP provision, there is no indication of what other community uses might be expected. These uses need to be clearly defined and justified. It is also unclear from the Plan whether the Council is expecting serviced land for these facilities or otherwise. The Site Assessment also makes reference to the potential for new primary education provision to be made on site. This requirement has not been carried forward into the Downton Road site development principles, but it is unclear whether this position will change going forward. The Council will be aware that Persimmon's Option 2 Masterplan has allowed for land for a new school should this be needed.
43. The design principles for the site also make reference the creation of a c. 40m wide sightline through the designed scheme to Salisbury's Cathedral. Persimmon support the design principle of creating views through the site to the Cathedral Spire; which has been incorporated in to the Persimmon masterplan. However, we are unclear on why the Council has opted for a 40m wide space. It is Persimmon's preference that the Plan does not specify the width of this view corridor, and this is instead informed by detailed townscape and landscape analysis.
44. Design principle four states, *'that nursery and community facilities are valid for both Sites 6 and 7'* but it is unclear on what is meant by this for planning purposes. For example, is there an expectation that infrastructure costs will be shared between the two sites, or that provision for such facilities can be made on either site? Clarity is required.
45. The Concept Masterplans (Figures 6 and 8) show four new accesses onto Downton Road. Considering that there are already 3 existing junctions along (or in close proximity to) the

site frontages, care will need to be taken to avoid negative traffic implications, particularly in terms of flow along Downton Road and through the Park and Ride. Rationalisation of these access points on the Concept Plans may be appropriate. Persimmon has previously tested a single access arrangement that excluded the western access, with main site access positioned opposite the Park and Ride. We would be willing to revisiting these Plan, should it be necessary, and would welcome discussions with the Council and highways officers in this regard.

#### *Fugglestone Red, Salisbury Development Opportunity*

46. The draft Local Plan's identification of the Fugglestone Red site as a 'committed site', where the principle of development is accepted, is supported by Persimmon. However, in light of the our previous comments regarding employment need and housing need and supply in Salisbury, Persimmon would welcome discussions with the Council as to whether re-designation of the employment element site for residential led-mixed use development might be a more appropriate approach.
47. The Fugglestone Red site (also known as St Peter's Place) was allocated in the adopted Core Strategy for 1,250 new homes and 8 hectares of employment land. The site received outline planning permission in 2012 for up to 1,250 new homes, employment, local community uses, primary school, public open space, landscaping and associated access works. Reserved matters approvals have been secured on around half of residential phases of the site, but the employment land remains subject to outline permission only. The St Peter's Place development has been a very successful sales site for Persimmon, and has been reliable source of housing for the Council for several years. If this site were to be re-designated for mixed use by the Council, it could continue to provide housing for Salisbury (within the existing settlement boundaries) for a number of more years to come.
48. It is considered that at least 5.5ha ha of the 8ha employment land site, could be re-designated for residential uses, with the remaining 2.5 ha safeguarded for small scale, start-up employment uses. From a sustainability point of view, continuing to allocate an employment site of this scale on the periphery of Salisbury has the potential increase unsustainable transport movements, and may compete with the City Centre employment offer.

#### **RURAL COMMUNITIES**

49. The Council has published an Empowering Rural Communities report which sets out the number of new homes to be delivered in 'Local Service Centres', 'Large Villages' and 'Elsewhere' (i.e. those settlement outside of the tier one and two 'main settlements'). As set out Paragraph 28 and 47 of the report Local Service Centres are 'intended to provide for modest levels of development in order to safeguard their role and to deliver affordable housing' and are 'expected to accommodate more growth than Large Villages'. This approach is supported by Persimmon as it recognises wider range of facilities and services at these settlement and the role and function they play in serving the surrounding rural hinterland.

50. The following section of these representations sets out Permission's comments in relation to housing needs of the rural communities, and sets out Persimmon's justification for the allocation of Persimmon's Salisbury Road, Downton for residential development.

#### Housing Distribution

51. Tables 2.3 and 2.4 of the Rural Communities Report set out the distribution of housing across the Local Service Centres and Large Villages within each of the HMAs. This distribution is based on a detailed methodology as explained in Appendix 1 of the Report. The Council's approach to the distribution of development across the rural communities is in broad conformity with the Planning Practice Guidance that directs local planning authorities to consider factors such as the characteristics of the neighbourhood area, population and role the settlement's in providing services.

#### Salisbury Road, Downton Development Opportunity

52. With regards to Persimmon's site at Salisbury Road, Downton, the Rural Communities Report described the settlement as a 'Local Service Centre' (tier three settlement). The Report sets out baseline indicative requirement of 235 new homes to be delivered in the plan period 2016-2036. Taking into account completions and commitments across the settlement, the residual housing requirement for Downton (i.e. how many new need to be provided at the town) is calculated as 108 new homes. The Council is looking to provide rural communities (including those covered by neighbourhood plan) with indicative housing requirements is supported by national policy and Persimmon Homes. This should provide a consistent basis for plan making across the rural area and should assist with the swift preparation of new neighbourhood plans and neighbourhood plan reviews. However, for reasons set out above, this housing requirement for Downton (and those for the individual HMAs and other settlement) may be too low.
53. It is concerning that in the Parish Council's response to the Local Plan consultation (Parish meeting report, 8th March 2021), members are seeking to reduce the draft housing requirement for Downton. The Parish's response also makes reference to '*a timed embargo on large scale speculative development*' and suggest that, if growth is directed to Downton, it should be phased towards the end of the plan period. The evidence base underpinning the Parish Council's assertions is, however underdeveloped, and does not reflect the positive planning approach as advocated by national planning policy. Wiltshire Council should therefore avoid reducing the Downton housing requirement as this would not be justified. Should Wiltshire Council be minded to reduce the requirement for Downton, it should be aware that this could also set an unhelpful precedent in terms of other neighbourhood plan groups seeking to lower their housing requirements. This could potentially undermine the Council's planning strategy to deliver appropriate levels of housing.
54. Persimmon has undertaken a number of detailed technical assessments of the site which has informed our initial Masterplan. This work is set out in detail in Persimmon's Site Deliverability Statement for the Salisbury Road site, which should be read along these representations. The Statement demonstrates that the sites is capable of delivering around 100 new homes, which could meet the indicative housing requirement for Downton. The Statement confirms that the site is a sustainable and deliverable development opportunity, that is bounded on three side by existing development and that can be brought forward in the short term, and should be considered for residential allocation.

55. Persimmon continue to seek to engage with the Parish Council regarding the review of the Downton Neighbourhood Plan, but at the current stage, Downton Parish has not formally announced whether a review of the Downton Plan will be undertaken. Given the Parish's response to the emerging Local Plan, there is considerable doubt that the Council will look to review the Plan. As such, Persimmon would urge the Council to consider making allocation through the Local Plan Review now (as opposed to waiting for a Site Allocations Plan or review of the NP) to ensure that housing needs of Downton are swiftly met and housing delivery with Wiltshire is boosted.

#### Rural Exceptions Sites and Community Led Housing Policy

56. The Rural Communities Paper sets out a revised policy wording for adopted Core Policy 44 relating to Rural Exceptions Sites and Community Led Housing. With regards to Community Led Housing, the policy should not be restricted to sites brought forward by a community land trust, and should instead be generally applied more generally to development that has demonstrable community support. It is also unclear why such sites should be required to provide 50% affordable housing. This threshold has not been subject to viability testing and may not represent the housing mix that local communities may wish to bring forward. As such, a specific percentage of affordable housing for Community Led Housing development should be deleted from the draft Policy.

#### Housing Requirements for Neighbourhood Area Designations in the Rural Area Policy

57. The Rural Communities Paper also sets out a new policy on the Council's approach to the delivery housing growth at Local Service Centres and Large Villages. The policy states that Site Allocations will generally be made through Neighbourhood Plan but, where this is not the case, it may be necessary for the Council to allocate sites (potentially as part of a Site Allocations Plan). The Council should be cautious about placing too much reliance on the delivery of new sites through neighbourhood plans. There is considerable uncertainty as to whether neighbourhood plans will be progressed / reviewed (the Downton Road Neighbourhood Plan is a case in point), and even where Plans are reviewed, there is not a requirement in national policy for new housing to be included within the scope of a plan. The Policy is also non-committal in terms of whether a Site Allocations Plan will be produced to identify new allocations where a Neighbourhood Plan have failed to do so. Indeed a Site Allocations Plan is not timetable within the LDS. As stated above, particularly with regards to Downton where there is considerable uncertainty as to whether a Neighbourhood Plan will be reviewed, the Council should look to proactively allocated sites now in the Local Plan Review. The Council should clearly sets out whether or not if intends on producing a Site Allocations Plan and this timetable confirmed in an updated LDS.

### **CLIMATE CHANGE AND BIODIVERSITY**

58. The Council has produced a Climate Change and Biodiversity Report that sets out five linked key policy themes that will help support the Plan's objectives in respect of adapting to and mitigating climate change. The Report also sets out the direction of travel with regards to biodiversity net gain (BNG).

#### Climate Change

59. The Report sets out a number of 'Policy Themes' for addressing various aspects of climate change and associated environmental issues. Policy Theme 1 relates to Flood Risk and Promoting Sustainable Water Management. The theme includes provisions for managing water to achieve a greenfield runoff rate plus 20% 'betterment'. It is unclear from the Plan whether this betterment relates to standard climate change adjustments or whether the 20% is expected over and above the climate change adjustment. Clarity is required. It is also noted the requisite improvements to run off rates can be met through any measures in the drainage hierarchy which may, or may not, include SUDS. There should be no expectation in the plan that SUDS are the only means of addressing surface water.
60. Policy Theme 3 sets out the Council's approach to sustainable design and construction (net zero carbon and Electric Vehicle (EV) charging infrastructure). Policy Theme 4 relates to sustainable energy generation and management (on site renewables and storage capacity, decentralised energy systems and adaptation of existing buildings). Finally, Policy Theme 5 relates to Sustainable Transport and Air Quality, including air quality issues and modal shift). With regards to all policy requirements sets out in these Policy Themes, the increased sustainably and efficiently standards will inevitably increase development cost. Persimmon support the inclusion of these policies where they are underpinned by evidence, particularly in relation viability. Until the viability work has been published, many of the elements set out in the Policy Themes cannot be supported. Persimmon welcomed the opportunity to comment on the local plan viability report in due course.

#### Biodiversity Net Gain

61. Policy Theme 2 (Enhancing Green/Blue Infrastructure and biodiversity) sets out a number of measures to enhance and create new Green/Blue Infrastructure. The Policy Theme also sets out a requirement for all new development to provide a minimum of 10% biodiversity net gain (BNG), which should be protected and positively managed post development for a minimum period of 30 years.
62. With regard to the BNG provisions it would be helpful if the Council adopted a specific method for the assessing and quantifying BNG increase to allow for consistency of approach between planning applications. Persimmon would welcome the opportunity to input towards this method document in due course.
63. It is noted that BNG is referred to within the National Planning Policy Framework (NPPF, Para 170(d) and Para 175(d)), but the NPPF does not specify a number/percentage for net gain. The forthcoming Environment Bill includes a requirement for all future schemes, including the development of land, to deliver a mandatory 10% BNG to be maintained for a period of at least 30 years.
64. Persimmon welcomes the principle of requiring BNG but, without a policy or legislative basis for the 10% requirement it would be premature for the Council to set this target in the Plan at this stage. It is Persimmon's view that this element of the Policy should be more flexibility worded so that applicants should '...seek to achieve a 10% net gain in biodiversity...' as opposed to this being a mandatory requirement.
65. Another issue with the policy is the potential impact on site viability and local plan viability more generally. From site specific point of view, some sites that are due to be brought

forward within new plan period will have been contracted prior to the introduction of BNG. The introduction of BNG may negatively impact on viability of sites due to the impact of BNG on land budgets, which may in turn may create issues with minimum values and minimum area provisions in existing contracts. Related to the above point, given the considerable impact that BNG requirements may have on developable areas and/or development costs, it will be necessary for the Council to account for these costs to development within its Local Plan viability evidence, which is yet to be published. Persimmon welcomes the opportunity to comment on this viability work once it has been made available by the Council.

Depending on the site in question, we are aware of instances where BNG requirements can take up around 50% of the overall site area. The Council should also be aware of these possible implications of 'land hungry' BNG on the amount of land that may need to be identified in the Plan.

66. There is also insufficient consideration of impact of this new Policy on sites that may be the subject of live planning applications (or reserved matters applications) where land budgets have been fixed. Assuming this Policy is carried forward in the Plan, it may be challenging for some sites to meet the BNG requirements due to unforeseen viability and land budget issues associated with BNG. As such, the Council should introduce transitional arrangements to guard against these unintended consequences outlined above and/or consider and excluding all 'committed' sites identified in the draft Plan from the 10% BNG requirement.
67. Wiltshire Council has not made it clear whether open space and mitigation land (for example or nutrient off-set land) would contribute towards the percentage requirement for BNG. We are aware that in other areas of the Country, Natural England are taking a view that mitigation and BNG must be provided on separate areas. Persimmon strongly objects to this approach. There is no valid reason why land can't serve multiple purposes. Indeed, the NPPF requires that the planning system uses land effectively and efficiently.

#### **HABITATS REGULATIONS ASSESSMENT**

68. The Council has commenced work on a Habitats Regulations Assessment (HRA) to support the Plan. As part of the draft Plan consultation, the Council has published a HRA scoping report. Given the important international ecological designations in the County (and in adjoining areas), and the potential for likely significant effects on these sites as a result of development, a HRA assessment of the emerging Plan is welcomed and necessary. Persimmon does not have any comments on the Scoping report but we look forward to inputting towards the more detailed HRA report in due course.



# Site Deliverability Statement

**Salisbury Road, Downton**

**Persimmon Homes South Coast**  
March 2021



# Site Deliverability Statement

## Salisbury Road, Downton

	Page		Page		Page
<b>1. INTRODUCTION</b>	<b>3</b>	<b>3. SITE ASSESSMENT</b>	<b>9</b>	<b>4. MASTERPLAN</b>	<b>12</b>
1.1 Introduction		3.1 Key Site Features		4.1 Opportunities and Influences	
1.2 Purpose		3.2 Surrounding Land Uses & facilities		4.2 Indicative Masterplan	
<b>2. SITE CONTEXT</b>	<b>4</b>	3.3 Accessibility Assessment		<b>5. CONCLUSIONS</b>	<b>15</b>
2.1 Site Location		3.4 Ecology Assessment		5.1 Sustainability Appraisal	
2.2 Local Context				5.2 Deliverability Appraisal	
2.3 National Planning Policy Context				5.3 Summary	
2.4 Local Planning Policy Context					

# 1.0 Introduction

## 1.1 Introduction

This site delivery statement has been prepared to assist the preparation of the Wiltshire Local Plan. This document aims to demonstrate that the Salisbury Road, Downton site represents a sustainable and deliverable contribution towards meeting the future housing needs of Salisbury and the wider Wiltshire area.

## 1.2 Purpose

The primary purpose of this document as stated is to show that there are no major viability, physical or insurmountable policy constraints associated with the Downton Road site. The site is a deliverable housing opportunity that can be brought forward in the short term (i.e. within 5 years).

This document provides an assessment of the site's context, in both physical and policy terms. It also initiates the site design process through appraising factors and opportunities that are relevant to the site, including heritage, landscape, access and ecology.

A draft masterplan is set out, demonstrating how the layout has responded to the site's opportunities and constraints.

This Document highlights that the site is highly sustainable, with good access to existing services. Based on the information in this document it is recommended that the site is allocated within the emerging Local Plan.

Image 1 (above): Site Location



# 2.0 Site Context

## 2.1 Site Location

The site is located to the West of Salisbury Road (A338) on the northern edge of Downton within Salisbury. Salisbury is one of the oldest settlements in the country and is the only City within the County of Wiltshire. The Site adjoins the Charles Church Bishop's Mead site, and the 'Scott's House' Development to north. The site is well related to existing housing and the Downton settlement boundary. This is a small-scale site (2.7 ha/ 6.7 acres) which is commensurate with site of settlement.

## 2.2 Local Context

Downton is designated as 'Service Centre' in Wiltshire Core Strategy and suitable for limited housing growth. The site falls adjoins the settlement boundary and there are no major site constraints to note.

To the east (adjacent) the site is close to the business park on Salisbury Road and the major employment and retail centre of Salisbury. There is a frequent bus services route along to Salisbury Road providing sustainable transport links to larger settlements.

South of the site, is a Charles Church development which provides access to the main road. The new builds lie on Batchelor Way and Bundy Grove. Further south are more residential areas, and Breamore Road, which provides a direct link into the City Centre. As shown on Figure 2 above, to the north of the site is the Scott's House development which will provide 17 new homes.



Image 2: Site Context

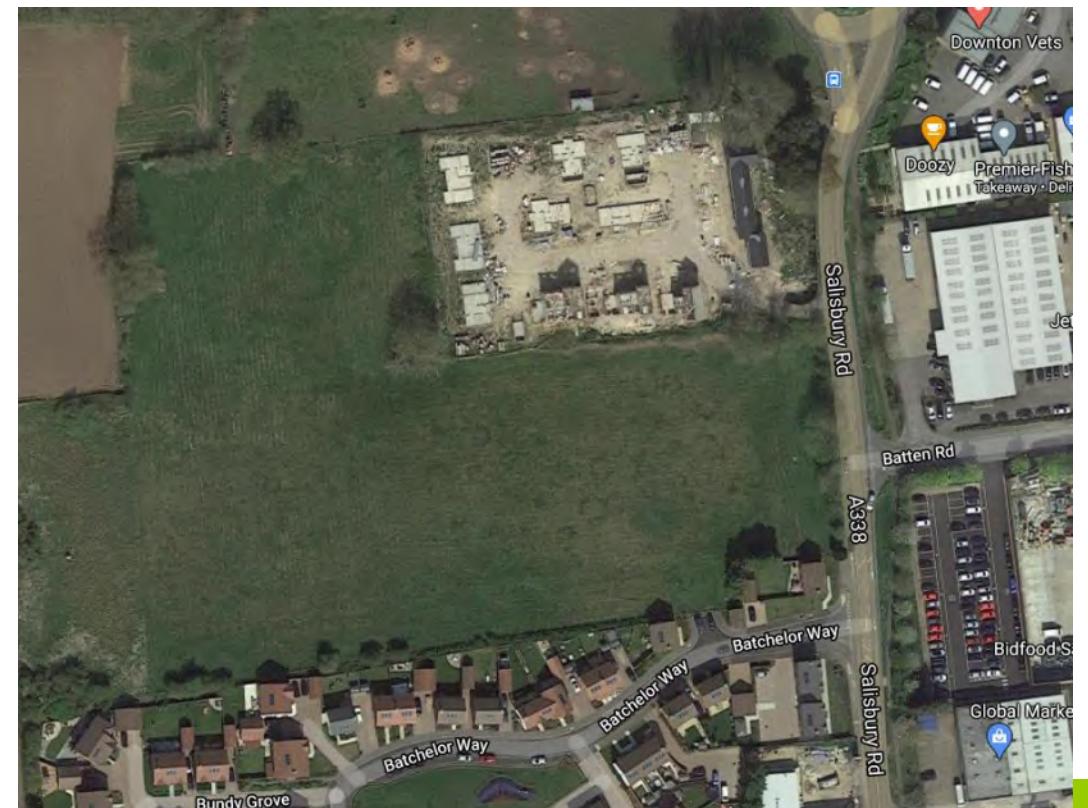


Image 3: Site Context

### 2.3 National Planning Policy Context

The National Planning Policy Framework (NPPF) published in February 2019 is a key consideration in the determination of planning applications and formulation of Development Plans, including Neighbourhood Plans. It forms an integral part of the Government's objective to make the planning system less complex and more accessible, to protect the environment and to provide a more streamlined mechanism that delivers its pro-growth strategy and ambition to significantly increase house building. A brief summary of some of the NPPF's key messages as relevant to the Downton Road site is set out below.

As set out in Paragraph 11 of the NPPF (extract opposite), sustainable development is central to both decision-taking and plan-making, including Neighbourhood Plans. In order to achieve sustainable development three objectives should be pursued: economic, social and environmental.

With regards to Neighbourhood Planning, the NPPF provides communities with the opportunity to shape, direct and help to deliver sustainable development by influencing local planning decisions as part of the statutory development plan. However, Neighbourhood Plans should compliment Local Plans and not be used to prevent development or frustrate the strategic planning policies of an area (Paragraph 29).

Planning Practice Guidance (PPG), provides additional detail to the policies of the NPPF, providing extensive guidance in relation to Neighbourhood Planning. As confirmed in the PPG, Neighbourhood Plan Groups are not required to allocate land for development. However, if Neighbourhood Plan Groups opt to do so there are a number of benefits, including providing additional planning protections from speculative planning applications (see NPPF paragraph 14), and providing residents with the opportunity to shape development and influence change where they live.

#### National Planning Policy Framework

#### The presumption in favour of sustainable development

11. Plans and decisions should apply a presumption in favour of sustainable development.
- For **plan-making** this means that:
- a) plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change;
  - b) strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas<sup>5</sup>, unless:
    - i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area<sup>6</sup>; or
    - ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.
- For **decision-taking** this means:
- c) approving development proposals that accord with an up-to-date development plan without delay; or
  - d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date<sup>7</sup>, granting permission unless:
    - i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed<sup>6</sup>; or
    - ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.

Images 4 & 5: NPPF and Paragraph 11 extract

## 2.4 Local Planning Policy Context

### Wiltshire Core Strategy

The Wiltshire Core Strategy was formally adopted in January 2015. It rightly acknowledges the need for new homes as one of the 6 main challenges facing the County:

*"There is a challenge to plan for sufficient new homes to be delivered in Wiltshire to address housing requirements. Providing decent and affordable homes to complement the economic growth being promoted is a key challenge to improving the self-containment and resilience of Wiltshire's communities. These new homes will need to be delivered at appropriate sustainable locations and must be supported by necessary improvements to infrastructure. Within a predominantly rural area, with a limited amount of previously developed land for redevelopment, the identification of the strategic growth sites to ensure an adequate supply of new homes is also a challenge." (Wiltshire Core Strategy)*

The wording stresses the importance of providing homes in sustainable locations, and the challenge of identifying deliverable strategic sites to ensure a suitable supply is maintained.

The Spatial Strategy within the Plan makes provision for around 27,500 jobs and 42,000 new homes between 2006 and 2026. There is a focus here on self-containment and not exacerbating commuting issues. Sustainable Development is rightly promoted as a key part of the Strategy. The Settlement Strategy (Core Policy 1) sets out an overarching hierarchy of settlements based on their level of facilities and the role they play in the District. Downton is described in the Core Strategy as a local service centre. Meaning Downton will provide for modest levels of development in order to safeguard their role and to deliver affordable housing. Downton is close to Salisbury, which is identified as a "Principal Settlement" (tier 1 settlement), in the hierarchy and is easily access from the site.

Image 7 shows the Wiltshire Policy map for Downton. This image highlights that the site is not restricted by any major policies.

Image 6: Wiltshire Core Strategy

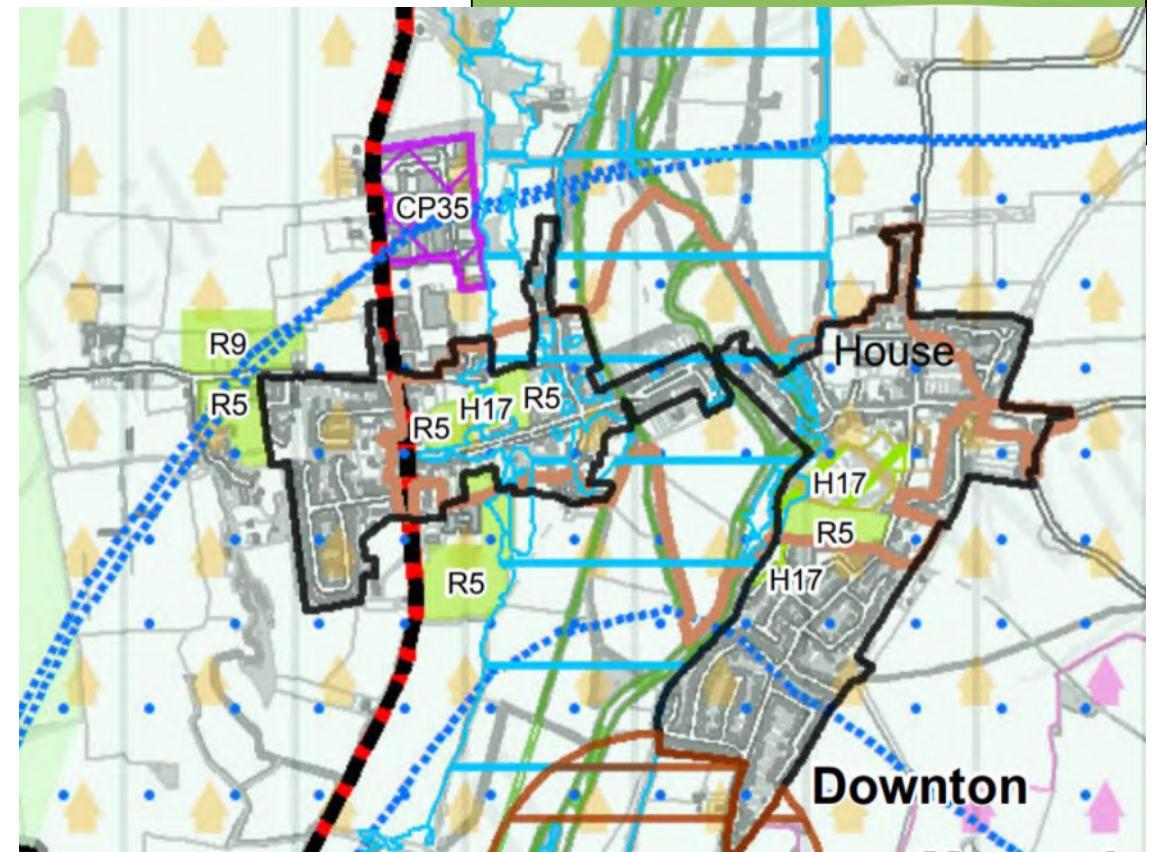
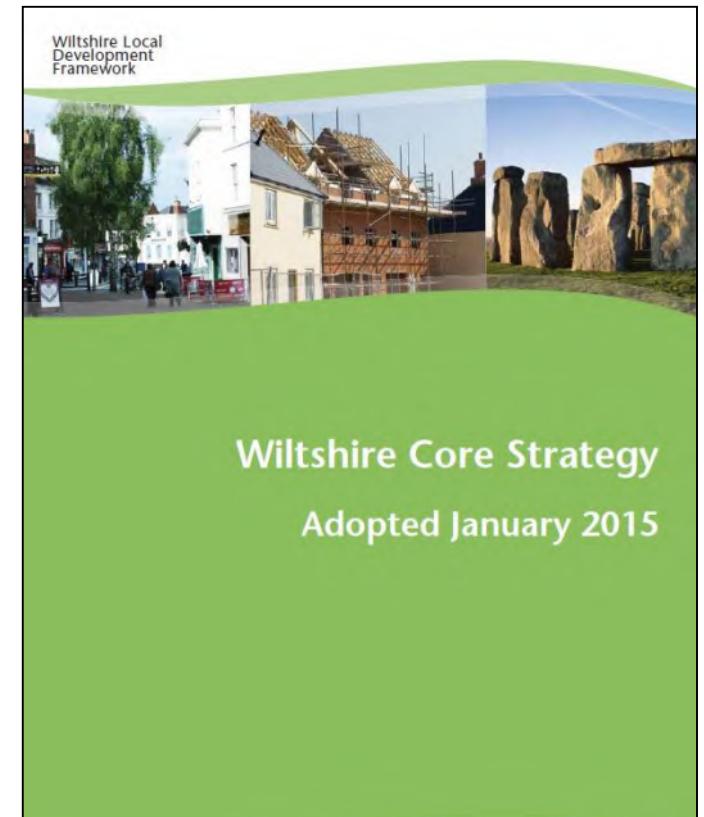


Image 7: Extract from Policies Map

## 2.5 Local Planning Policy Context Cont

### Southern Wiltshire Area Strategy

The Core Strategy sets out a particular strategy for Southern Wiltshire. The strategy acknowledges that Downton functions as a Local Service Centre for the south east corner of Wiltshire. Salisbury provides the main employment, retail, leisure and cultural centre for the area. The area also has good A-road connectivity to the south coast, and so the influence of larger centres such as Bournemouth and Southampton is also strong, especially for employment and retailing. Due to the highly constrained nature of Salisbury, it is inevitable that a significant proportion of the growth required to meet its long-term needs will be located on greenfield sites on the edge of the city. Because the administrative boundaries are drawn tightly around the city, this will result in growth in several neighbouring parishes.

The strategy for the Southern Wiltshire Community Area is to provide for balanced growth of both housing and employment to deliver sustainable communities and help address the shortfall in affordable housing. The strategy will respond to the Community Area's location (in full or part) within a nationally designated landscape. It will deliver, within the overall objective of conserving the designated landscapes, a modest and sustainable level of development. In response to this challenge, Downton will continue to be the focus of appropriate levels of managed growth. It will have a choice of transport and provide a good range of services, and good levels of employment.

### Housing Site Allocations Plan: Adopted Feb 2020

The document allocates new housing site where housing needs in specific areas were not being met through the Core Strategy. The background documents (see table adjacent) showed that there was a remaining requirement for 122 dwellings for Downton.



Image 8: Downton Village

## Applying the methodology: where are we looking for sites in the South HMA?

Type of settlement	Area of search	Remaining housing requirement (homes)
Principal Settlement	Salisbury	625
Market Town	Amesbury, Bulford and Durrington	69
Local Service Centre	Downton	122
Large Villages	Amesbury Community Area Great Wishford, Porton, Shrewton, Tilshead, The Winterbournes	184
	Tisbury Community Area Fovant, Hindon, Ludwell	158
	Wilton and Salisbury Community Area Broadchalke, Dinton	102

Image 9: Extracts from the Wiltshire Housing Site Allocations Plan

## 2.6 Local Planning Policy Context Cont.

### Downton Neighbourhood Plan

The Vision for Downton, is to encourage the village to evolve and thrive as a vibrant and attractive area and for all the communities of the parish to retain their unique and distinctive characters. The Neighbourhood Plan aims to meet the diverse and growing needs of existing and future residents and to provide a high quality infrastructure and environment in which to live and work.

The objectives are:

- To deliver a housing growth strategy tailored to the needs and context of the Neighbourhood Plan.
- To encourage sustainable, small scale developments over large scale mass housing.
- To improve and sustain high quality local facilities for existing and new residents.
- To strengthen and support local economic activity.
- To seek ongoing improvements to transport, walking, cycling, drainage and digital connectivity.
- To prioritise local distinctiveness in every aspect of change and growth.
- To maintain historical sites and traditional built environment.
- To protect green spaces.

### Emerging Local Plan

The timetable for production of the new Local Plan, as set out in the Local Development Scheme (March 2020), is summarised below:

- August -September 2020: Informal engagement on scope and emerging strategy (Regulation 18)
- August - September 2021: Pre-submission consultation (Regulation 19)
- May – June 2022: Submission
- February – March 2023: Adoption

### Rural Communities

The Council has published an Empowering Rural Communities report which sets out the number of new homes to be delivered in 'Local Service Centres', 'Large Villages' and 'Elsewhere' (i.e. those settlement outside of the tier one and two 'main settlements'). The housing requirements table shown in image 10 highlights that Downton has the 'Baseline indicative housing requirement 2016-2036' of 235 dwellings. There is a clear need for housing in this area, and as set out in the Statement, the Salisbury Road, Downton site is available to meet this need.

Image 10: Extract from the Rural Communities Housing Requirements

## Housing Requirements

### Outputs for Local Service Centres

Table 2.3: Local Service Centre indicative housing requirements

HMA	Settlement	Baseline indicative housing requirement 2016-2036	Annualised baseline housing requirement in dwellings per annum	Completions (2016-19) & Commitments (1 April 2019)
Swindon	Cricklade	385	19.25	149
	Pewsey	145	7.25	111
Chippenham	Market Lavington	100	5.0	68
	Mere	300	15.0	156
Salisbury	Downton	235	11.75	127
	Tisbury	135	6.75	70
	Wilton	400	20.0	407



### 3.3 Accessibility Assessment

The preferred access to the site is via Batchelor Way. A connection at this point would maintain the existing direct route towards Downton facilities for pedestrians and cyclists.

The access appraisal includes a review of pedestrian and cyclist routes, which would link the site with key facilities and destinations within the neighbouring areas. The provision of suitable pedestrian and cyclist links between the site and key facilities within Downton are essential as part of any residential development of the site. The document also includes a review of existing bus services and facilities, which would provide future residents with options to travel further afield.

A copy of the Accessibility Assessment is available on request.

Image 13: Views of Batchelor Way



Image 14: A338 The Headlands / B3080 The Borough

### 3.4 Ecology (INTERIM ECOLOGICAL ASSESSMENT)

The main findings of the Interim Ecological Assessment are:

- The River Avon SAC and New Forest SPA/SAC and Ramsar site are within the site's Zone of Influence. Mitigation measures in respect of increase in phosphate discharge into the River Avon SAC and increased recreational pressure on the New Forest designated sites will require consideration as part of the scheme.
- The habitats within the site comprise common and widespread species with the hedgerows and mature trees being the features of relatively greater value. The site has been assessed as having suitability to support roosting bats, breeding birds, stag beetle and west European hedgehog.
- Survey work undertaken to date has identified an assemblage of foraging and commuting bats of local importance, including records of both greater horseshoe and barbastelle. Reptiles have also been confirmed as likely absent from the site.
- Recommendations have been made for further survey work in order to determine the presence/absence of roosting bats and further update the assessment in relation to foraging and commuting bats .
- Recommendations include the retention of the boundary vegetation and mature trees with new native species landscaping within the proposals.
- It may be appropriate to undertake a Biodiversity Metric Assessment to determine whether the proposals can deliver biodiversity net gain. Detailed mitigation will be developed as the scheme progresses.
- Subject to the inclusion of appropriate mitigation it is considered that proposals at the site have the scope to accord with relevant planning policy in respect of ecology.

A copy of the Interim Ecological Assessment is available at request.

Image 15: Phase 1 habitat map





Image 18: Indicative Masterplan



The masterplan is for discussion only. Persimmon welcomes the opportunity to refine the development proposal with the Council.

## 4.2 Indicative Masterplan

Based on the Opportunities and Influences of the site an Indicative Masterplan for the site has been developed. This is shown in full on the previous page, but the key elements are described below:

- The Site provides an opportunity to deliver new public open space, which could include new play space / trim trail.
- A net developable area of around 5.36 acres (2.2ha), which could provide approximately 100 new homes (including around 40 new affordable homes).
- A varied density is proposed with lower density edges to ensure an efficient use of land and to reflect the edge of settlement character of the site
- One potential access points is shown, this will utilise the existing access taken from the Charles Church site to south and use the turning head from Batchelor Way.
- Key trees towards site boundaries to be retained and protected.
- Landscape buffer to western and southern boundary also provide screening to existing properties.



Image 19: Cyclists

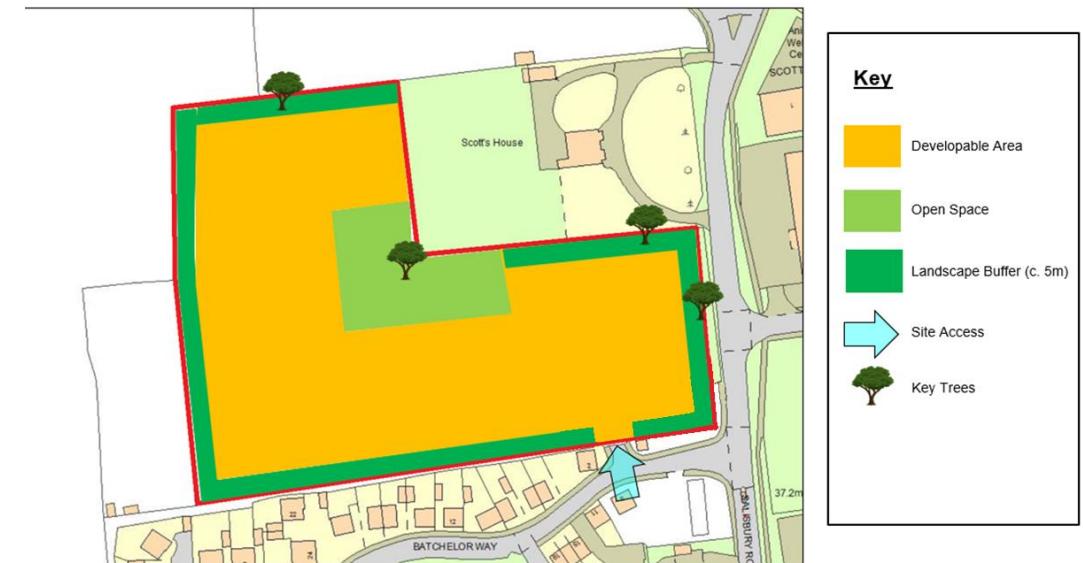


Image 20: Indicative Masterplan



Image 21: Persimmon Dwelling

# 5.0 Conclusions

## 5.1 Sustainability Appraisal and Planning Benefits

The Downton scheme will provide a number of benefits and, as summarised below, will deliver the sustainable development objectives set out in the NPPF.

### Economic Role

- Provide much needed family and affordable housing within the South Wiltshire market area;
- Provide appropriate contributions towards local infrastructure and ensure long term viability of local services;
- New residents would provide expenditure to inject into local goods services.
- Provide Council Tax receipts (per annum) and the New Homes Bonus.
- CIL and Section 106 contribution would also be provided to the Local Authority.

The provision of housing and new residents is an important part of the Spatial Strategy for the Wiltshire area as set out in the Core Strategy. This acknowledges past under-delivery and the threat to economic growth due to a lack of a viable workforce.

### Social Role

- The site is well placed and well connected to adjacent residential development and local services;
- The site is well serviced by local footpaths. This, along with the regular bus services that run along Downton Road should promote sustainable travel;
- The site would deliver much needed high-quality homes and create a positive built environment for future residents, whilst protecting the amenity of existing residents
- The site can deliver high quality and accessible open space and a local play area to serve the new residents and those who leave nearby;
- Development will help support City Council services;
- The site will deliver much needed affordable housing which meet the policy requirements set out by the Council.

### Environmental Role

- The site will be developed in a way to mitigate any identified environmental harm, as per the requirements of the NPPF;
- A ecology study has been undertaken and the recommendations have helped shape the masterplan and will follow to ensure that species and habitats are carefully protected, with any impact mitigated where necessary;
- New homes will be built towards higher building standards, in accordance with national Building Regulations, which help reduce energy and water consumption;

Image 22 NPPF Sustainable Development Objectives



Image 23: Sustainability



## 5.2 Deliverability Appraisal

Central Government Planning Practice Guidance states that for a site to be considered deliverable it must be suitable, available and achievable. The Council's most recent SHELAA highlights that the site is deliverable against these three measures. The following section sets out how the proposal accords with each of the deliverability aspects.

### Suitability

The extract adjacent (right) is from the Planning Practice Guidance and sets out how suitability of sites should be assessed. Taking this into account the site at Salisbury Road is considered suitable because:

- Wiltshire Council have acknowledged that there is a need for housing in Downton.
- The site is well located in relation to services, public transport links.
- There are no physical limitations that adversely influence the ability to access or serve the site.
- Highways and ecology assessments have been undertaken and show that the site can fully mitigate any potential impacts.
- The site's scale and surroundings offers the opportunity to provide generous landscaping and buffers between surrounding and proposed land uses to ensure that both existing and new residents enjoy a positive living environment.
- The Council's SHELAA highlighted no overriding issues with the site's suitability.

### Availability

The site is wholly under option with Persimmon Homes. The landowner is fully committed to the delivery of residential development on the site and there are no known legal issues that would prevent the delivery of the site moving forward

### Achievability

Persimmon Homes is one of the largest house builders in the Country and have delivered several schemes of this nature and scale both nationally and locally. The Company has the financial strength and commitment to ensure that the site is delivered in a timely fashion.

The Company has vast experience and a solid track record of delivering strategic housing sites and have worked notably in Salisbury in the past. At the very local level, the Bishop's Mead development which is located to the south of the Downton Road site was delivered by Persimmon Homes' Charles Church arm of the business. The Company has undertaken viability assessment of the site which confirms that the site is viable for development.

The Downton Road, Salisbury site is, therefore, considered achievable for residential development. There is a very strong prospect that the site would be developed following the grant of a satisfactory planning permission.

## Image 24: Planning Practice Guidance Extract

### **What factors should be considered when assessing the suitability of sites/broad locations for development?**

Plan makers should assess the suitability of the identified use or mix of uses of a particular site or broad location including consideration of the types of development that may meet the needs of the community. These may include, but are not limited to: market housing, private rented, affordable housing, people wishing to build or commission their own homes, housing for older people, or for economic development uses.

Assessing the suitability of sites or broad locations for development should be guided by:

- the development plan, emerging plan policy and national policy;
- market and industry requirements in that housing market or functional economic market area.

When assessing the sites against the adopted development plan, plan makers will need to take account of how up to date the plan policies are and consider the appropriateness of identified constraints on sites/broad location and whether such constraints may be overcome.

Sites in existing development plans or with planning permission will generally be considered suitable for development although it may be necessary to assess whether circumstances have changed which would alter their suitability. This will include a re-appraisal of the suitability of previously allocated land and the potential to designate allocated land for different or a wider range of uses. This should be informed by a range of factors including the suitability of the land for different uses and by market signals, which will be useful in identifying the most appropriate use.

In addition to the above considerations, the following factors should be considered to assess a site's suitability for development now or in the future:

- physical limitations or problems such as access, infrastructure, ground conditions, flood risk, hazardous risks, pollution or contamination;
- potential impacts including the effect upon landscapes including landscape features, nature and heritage conservation;
- appropriateness and likely market attractiveness for the type of development proposed;
- contribution to regeneration priority areas;
- environmental/amenity impacts experienced by would be occupiers and neighbouring areas.



Image 25: Inside of a Persimmon Home

### 5.3 Summary

The current and emerging Policy framework in Wiltshire makes it clear that there is a need for additional housing sites for the Southern HMA and in Downton.

The site meets the criteria of Sustainable Development under the definitions of the NPPF. It will provide significant social benefits through the provision of much needed housing (including affordable). Economic benefits will come from the jobs associated with the build, but also through the spending power of new residents and moneys paid to the Local Authority through CIL, Planning Obligations the New Homes Bonus and Council Tax. The site will be environmentally sustainable through the provision of new areas of open space and SuDS and will allow for ecological enhancements.

This document has reviewed the site's context and Opportunities and Influences. A masterplan has been developed which fully takes account of all the above, and clearly demonstrates that a well designed residential development can be achieved on the site.

Based on the site's assessment, the net developable area is around 2.2ha, which provides a potential capacity of 100 dwellings (which would include an appropriate percentage of affordable housing). The capacity applied reflects the site's context, including the character of the recent development to the north and south of the site.

The scheme. Persimmon Homes is one of the largest house builders in the Country. The Company's financial strength and commitment to building houses means that the site can be delivered quickly following the grant of a satisfactory planning permission.

Overall, this Deliverability Statement has demonstrated that the site at Salisbury Road, Downton is deliverable being a available, suitable and achievable development opportunity. Persimmon Homes strongly believes that this site should be a preferred allocation in the emerging Local Plan.

If supported by the Council, Persimmon Homes could proceed with an application swiftly, which would ensure that the site could also contribute significantly the 5 year land supply position

Image 25: Persimmon Dwellings



Image 26: Site Location Plan



Image 27: Sold Homes



# Site Deliverability Statement

## Downton Road, Salisbury

Submitted in relation to the Wiltshire Local Plan  
Consultation March 2021

**Persimmon Homes South Coast**  
March 2021



# Site Deliverability Statement

## Downton Road, Salisbury

	Page		Page		Page
<b>1. INTRODUCTION</b>	<b>3</b>	<b>3. SITE ASSESSMENT</b>	<b>10</b>	<b>4. MASTERPLAN</b>	<b>18</b>
1.1 Introduction		3.1 Key Site Features		4.1 Opportunities and Influences	
1.2 Purpose		3.2 Surrounding Land Uses		4.2 Indicative Masterplan	
<b>2. SITE CONTEXT</b>	<b>4</b>	3.3 Surrounding Facilities		<b>5. CONCLUSIONS</b>	<b>25</b>
2.1 Site Location		3.4 Accessibility Assessment		5.1 Sustainability Appraisal	
2.2 Local Context		3.5 Highways and Transport		5.2 Deliverability Appraisal	
2.3 National Planning Policy Context		3.6 Landscape Principles and Green Infrastructure		5.3 Summary	
2.4 Local Planning Policy Context		3.7 Heritage Assessment			
		3.8 Ecology			
		3.9 Sustainable Urban Drainage and Flooding			

# 1.0 Introduction

## 1.1 Introduction

This Delivery Statement has been prepared to assist the preparation of the Wiltshire Local Plan Review 2016-2036. The supporting technical documents and drawings listed below have been commissioned to inform the content of this Statement and are available on request.

- Highways Technical Note
- Preliminary Access Drawings
- Landscape and Visual impact Assessment
- Ecological Appraisal
- Preliminary Heritage Assessment
- Geophysical Survey Report

This Statement demonstrates that the Downton Road, Salisbury is capable of providing c.350 new homes and offers the potential to provide land for new school provision. The site represents a sustainable and deliverable development opportunity that can make a meaningful contribution towards meeting the future housing needs of Salisbury and the wider Wiltshire area.

This site was identified by Wiltshire Council as a “Potential Option” through the Housing Site Allocations Plan (WHSAP), but was not taken forward in the adopted Plan. The site is now proposed as a draft allocation in the emerging Local Plan review.

## 1.2 Purpose

The primary purpose of this Statement is to show that the Downton Road site is a sustainable and logical housing opportunity that can be brought forward in the short term (i.e. within the next 5 years).

The site has been subject to a number of technical assessment which have shown that there are no insurmountable physical or policy constraints to the delivery of the site for housing. This work, together with analysis of the site’s opportunities and influences has informed the production of a number of masterplan options for the site .

Based on the information set out in this Statement, Persimmon supports the proposed allocation of the Site in the Salisbury Neighbourhood Plan.



Image 1 (above): Site Location



# 2.0 Site Context

## 2.1 Site Location

The site is located to the north of Downton Road (A338) on the south eastern edge of the Cathedral City of Salisbury. Salisbury is the only City within the County of Wiltshire and one of the oldest settlements in the Country. The site measures some 15.24ha (37.658 acres) in size.

The site is easily accessible from the City Centre by utilising existing pedestrian links, including the public right of way that extends along the northern boundary.

## 2.2 Local Context

The urban area boundary of the City lies immediately west of the site, with residential properties on both sides of Downton Road. Further west are more residential areas including New Bridge Road, which provides a direct link into the City Centre. Fronting the northern edge of Downton Road are properties from the early 1900's. Post war housing characterises the urban form further north along Manor Road, Britford Lane, Dryden Close and Butler Close.

To the south of the site, on the opposite side of Downton Road, are the most recent phases of the Persimmon Homes Cathedral Gardens development the Britford Park and Ride scheme (that provides regular services in to the City Centre) and a proposed allocation site (South of Downton Road). Beyond this are agricultural fields which lead up to Salisbury Hospital.

The River Avon valley runs along the site's northern boundary, part of which also falls within the Britford Conservation Area. North of the river valley are the Milford industrial estates and retail parks that are located on either side of Southampton Road.

Bridge Farm is located immediately to the east of the site, which includes a Grade II listed barn. Further east is the village of Britford, and its Conservation Area, beyond which is a more rural landscape.

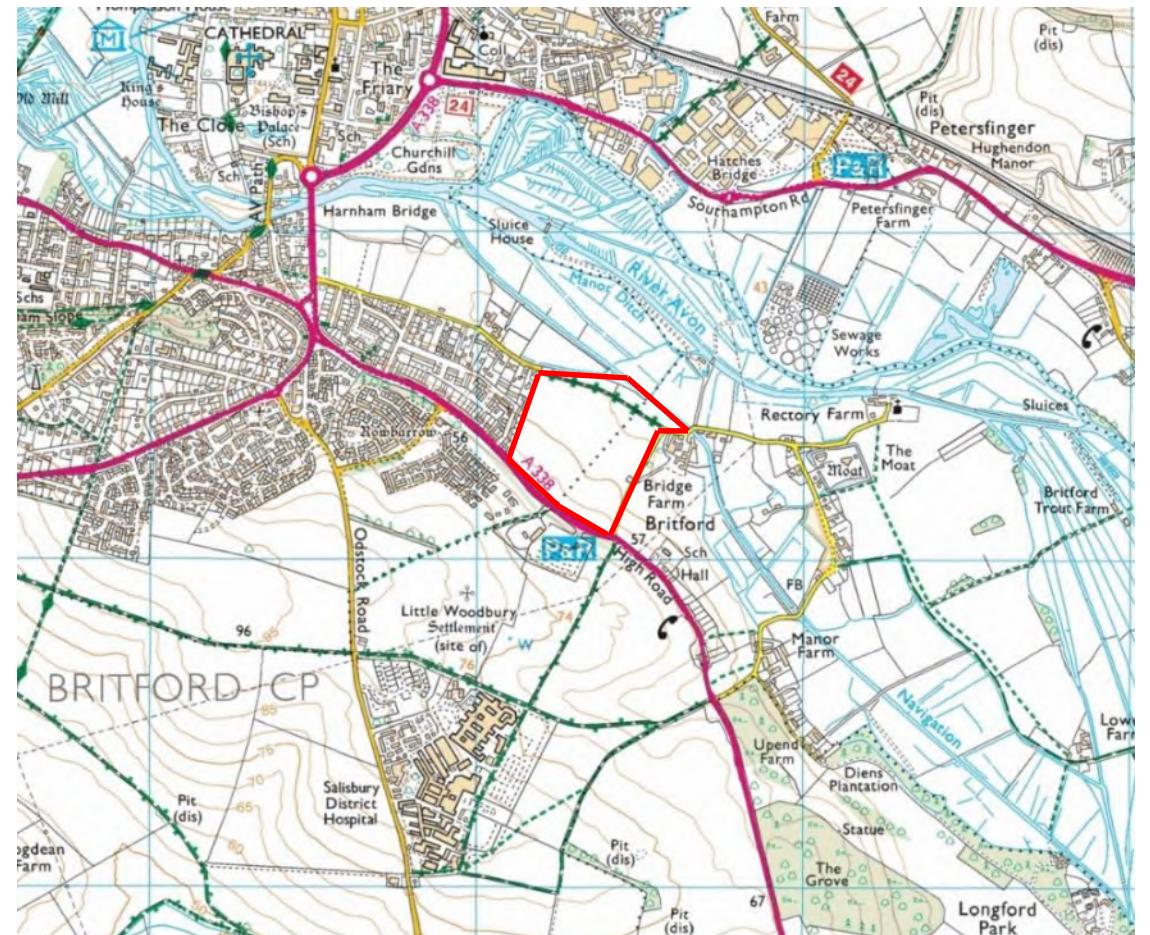


Image 2: Site Context



Image 3: Adjacent residential properties

### 2.3 National Planning Policy Context

The National Planning Policy Framework (NPPF) published in February 2019 is a key consideration in the determination of planning applications and formulation of Development Plans, including Neighbourhood Plans. It forms an integral part of the Government's objective to make the planning system less complex and more accessible, to protect the environment and to provide a more streamlined mechanism that delivers its pro-growth strategy and ambition to significantly increase house building. A brief summary of some of the NPPF's key messages as relevant to the Downton Road site is set out below.

As set out in Paragraph 11 of the NPPF (extract opposite), sustainable development is central to both decision-taking and plan-making, including Neighbourhood Plans. In order to achieve sustainable development three objectives should be pursued: economic, social and environmental.

With regards to Neighbourhood Planning, the NPPF provides communities with the opportunity to shape, direct and help to deliver sustainable development by influencing local planning decisions as part of the statutory development plan. However, Neighbourhood Plans should compliment Local Plans and not be used to prevent development or frustrate the strategic planning policies of an area (Paragraph 29).

Planning Practice Guidance (PPG), provides additional detail to the policies of the NPPF, providing extensive guidance in relation to Neighbourhood Planning. As confirmed in the PPG, Neighbourhood Plan Groups are not required to allocate land for development. However, if Neighbourhood Plan Groups opt to do so there are a number of benefits, including providing additional planning protections from speculative planning applications (see NPPF paragraph 14), and providing residents with the opportunity to shape development and influence change where they live.



Ministry of Housing,  
Communities &  
Local Government

#### National Planning Policy Framework

#### The presumption in favour of sustainable development

11. Plans and decisions should apply a presumption in favour of sustainable development.
- For **plan-making** this means that:
- a) plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change;
  - b) strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas<sup>5</sup>, unless:
    - i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area<sup>6</sup>; or
    - ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.
- For **decision-taking** this means:
- c) approving development proposals that accord with an up-to-date development plan without delay; or
  - d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date<sup>7</sup>, granting permission unless:
    - i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed<sup>6</sup>; or
    - ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.

Images 4 & 5: NPPF and Paragraph 11 extract

## 2.3 Local Planning Policy Context

### Wiltshire Core Strategy (January 2015)

The Wiltshire Core Strategy (WCS) acknowledges the need for new homes as one of the six main challenges facing the County:

*"There is a challenge to plan for sufficient new homes to be delivered in Wiltshire to address housing requirements. Providing decent and affordable homes to complement the economic growth being promoted is a key challenge to improving the self-containment and resilience of Wiltshire's communities. These new homes will need to be delivered at appropriate sustainable locations and must be supported by necessary improvements to infrastructure. Within a predominantly rural area, with a limited amount of previously developed land for redevelopment, the identification of the strategic growth sites to ensure an adequate supply of new homes is also a challenge."* (Paragraph 2.21)

The wording stresses the importance of providing homes in sustainable locations, and the challenge of identifying deliverable strategic sites to ensure a sufficient housing supply is maintained.

The Delivery Strategy within the Plan (Core Policy 2) makes provision for a minimum of 42,000 new homes between 2006 and 2026. The Strategy sets out a minimum housing requirement for the South Wiltshire Housing Market Area (HMA) of 10,420 new homes across the plan period. However, as the Core Strategy is now over five years old, Local Housing Need - as determined through the application of the Government's Standard Methodology - now takes precedent in terms of assessing housing needs and supply. Core Policy 2 also focusses on self-containment and not exacerbating commuting issues. Sustainable Development is rightly promoted as a key part of the Strategy.

The Settlement Strategy (Core Policy 1) sets out an overarching hierarchy of settlements based on their level of facilities and the role they play in the District. Salisbury is identified as a "Principal Settlement" (Tier 1 settlement) and is described thus in the WCS:

*"Wiltshire's Principal Settlements are strategically important centres and the primary focus for development. This will safeguard and enhance their strategic roles as employment and service centres. They will provide significant levels of jobs and homes, together with supporting community facilities and infrastructure, meeting their economic potential in the most sustainable way to support better self containment."* (Core Policy 1)

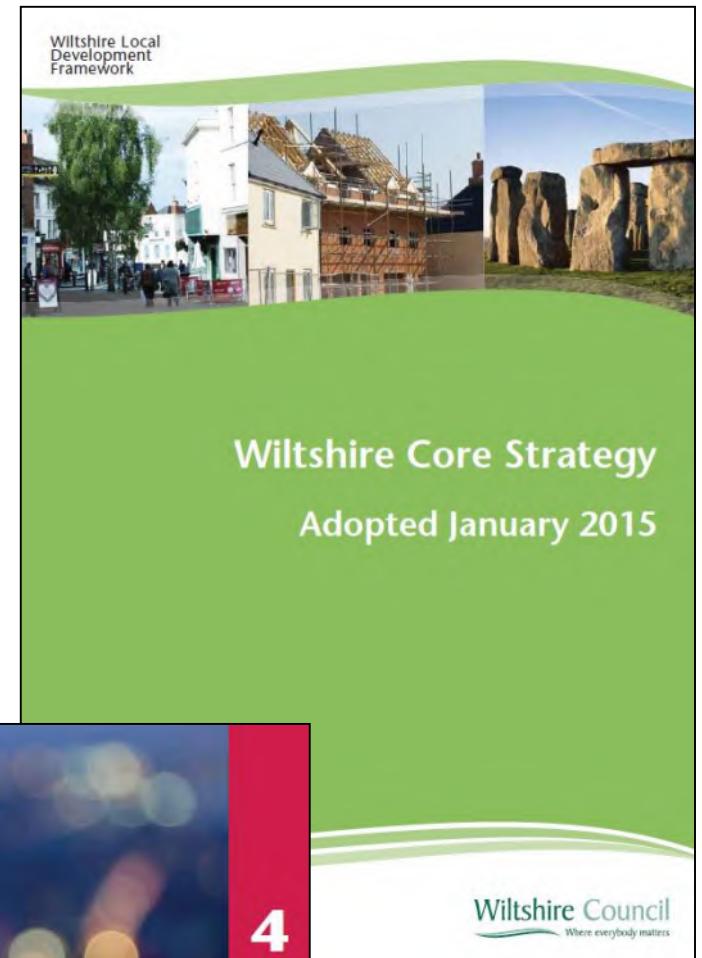


Image 6: Wiltshire Core Strategy

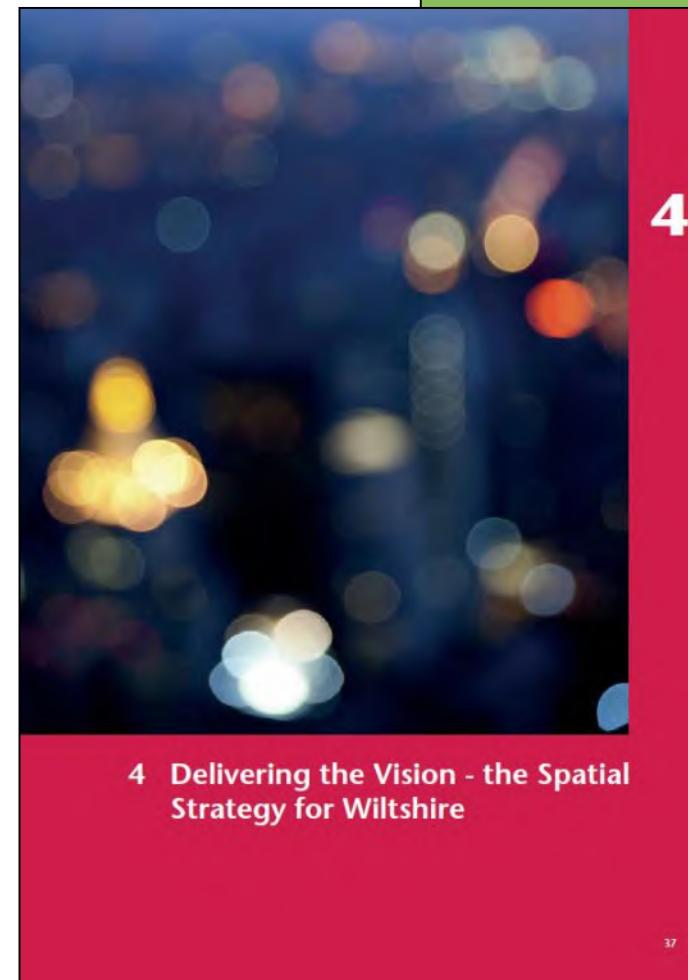


Image 7: Spatial Strategy for Wiltshire

## 2.4 Local Planning Policy Context Cont.

The WCS sets out a key issues and a specific planning strategy for Salisbury. The introduction to the Salisbury strategy acknowledges that the City has:

*"...experienced a historic undersupply of housing over recent years. Without delivering a step change in housing delivery the character of Salisbury will slide into the role of a dormitory settlement with an ageing population, lack of viable workforce, anti-competitive investment environment, declining retail sector and consequential environmentally harmful out-commuting."*

In the context of the above, deliverable housing schemes are of upmost importance in securing the long term sustainable future of the City. The Council recognises that without growth the City risks economic stagnation. The WCS allocates a number of mixed-use sites, such as Fugglestone Red, Old Sarum and Churchfields, but there is also an acknowledgment that ongoing monitoring will be required to ensure housing delivery rates are maintained.

### Wiltshire Housing Site Allocations Plan (February 2020)

The Wiltshire Housing Sites Allocation Plan (WHSAP) allocates new housing sites to meet housing needs in specific areas that were not being met. This includes significant new allocations at Salisbury that were identified to address the under-delivery at other sites identified in the area, including Churchfields. Extracts of the Southern HMA housing requirements and the corresponding allocations made in the WHSAP are set out in the tables opposite.

As part of the WHSAP preparation process a number of sites were assessed, including the Downton Road site (site reference S159 - see overleaf). The Downton Road site was one of just five large sites, identified by the Council, that could potentially provide a major contribution to the remaining housing requirement in Salisbury. As set out in Persimmon's representations on the WHSAP, it was demonstrated that the site ranks favourably against other sites on the periphery of Salisbury when sustainability, environmental and heritage considerations are taken into account. Whilst the Downton Road site was not taken forward in the WHSAP, the identification of the site as an option in the Plan provides clear evidence that the site is a suitable candidate for residential allocation in the Neighbourhood Plan.



Image 8: Salisbury City Centre

#### Housing Market Areas: Minimum to be allocated

Housing Market Area	Minimum Housing Requirement	Completions 2006-2017	Developable commitments 2017-2026	Minimum to be allocated
East Wiltshire HMA	5,940	3,624	2,311	5
North and West Wiltshire HMA	24,740	13,025	10,606	1,109
South Wiltshire HMA	10,420	5,388	3,701	1,331

#### Housing Allocations in the South Wiltshire Housing Market Area

Community Area	Reference	Site Name	Approximate number of dwellings
Salisbury	H3.1	Netherhampton Road, Salisbury	640
	H3.2	Hilltop Way	10
	H3.3	North of Netherhampton Road	100
	H3.4	Land at Rowbarrow	100
	H3.5	The Yard, Hampton Park	14
Amesbury	H3.6	Clover Lane, Durrington	45
	H3.7	Larkhill Road, Durrington	15

Image 9: Extracts from the Wiltshire Housing Site Allocations Plan





## 2.4 Local Planning Policy Context Cont.

### Emerging Local Plan

Wiltshire Council is in the early stages of reviewing its adopted Local Plan. The production timetable for the new Local Plan, as set out in the Local Development Scheme (March 2020), is summarised below:

- Publication consultation: Q4 2021
- Submission : Q3 2022
- Examination (inc. hearings and Inspector's report): Q4 2022
- Adoption: Q2 2023

### Wiltshire Spatial Strategy Document

Salisbury is classed as a 'Principle Settlement' These are the primary focus for development and will provide significant levels of jobs and homes. This document lists that the standard method requires 40,840 additional dwellings as a minimum housing figure and 45,630 additional dwellings (as derived from the Local Housing Need Assessment) as an upper figure.

### Salisbury Planning Salisbury

The overall housing need range figures discussed above are then translated into need for each HMA (between 10,470 - 10,975 additional dwellings in the Salisbury HMA, and 5,240 new homes in Salisbury. The Salisbury Report also set out Concept Plans for sites proposed for allocation.

### Salisbury Site Selection Report

This Report provides assessment on site 6 (North of Downton Road) and site 7 (South of Downton Road). Both sites are assessed against five Sustainability Appraisal (SA) objectives. To summarise, Site 7 is ranked 2<sup>nd</sup> and Site 6 ranked 3<sup>rd</sup> out of the eight shortlisted sites considered within the SA.

Image11: Concept map for Sites 6 and 7 showing boundary outlines and proposed layout and land uses, within which to accommodate development



# 3.0 Site Assessment

Image 12: View of site from northern end of Lower Road



## 3.1 Key Site Features

The site sits at the edge of the urban area when heading into Salisbury from the south east along Downton Road. The site has relatively few features, being mostly managed arable land. The boundaries to the south, east and west comprise managed hedgerow.

The northern part of the site is different in character from the wider site predominantly consisting of open grassland of a similar nature to the wider flood plain further north. A public bridleway crosses this part of the site and is flanked by vegetation boundary, interspersed with mature trees.

Key features of note are located outside of the site boundary. These include views towards Salisbury Cathedral, the adjacent Britford Conservation Area and the wider flood plain of the River Avon to the north, which includes the Water Meadows. These features, and their potential influence over the site's development, are discussed in more detail in subsequent sections of this Statement.

## 3.2 Surrounding Land Uses

The surrounding area can be classed as a mixture of residential and agricultural, as the site marks the transition between the urban area to the west and the countryside to the east. To the north of the site is the River Avon flood plain, which forms an important contribution to the setting of the City.

The land west and south west of the site are almost entirely residential, apart from local commercial and community facilities. This part of Salisbury is connected to the City Centre by New Bridge Road, which runs

over the River Avon. To the south, beyond the Park and Ride, is Salisbury District Hospital, although an area of farmland provides a gap between the two. The village of Britford sits to the east of the site within a meander of the River Avon. The fields around the village are mainly used for grazing purposes.

## 3.3 Surrounding Facilities

There are a wide range of facilities in the immediate area and within walking distance of the site. The site benefits from easy access to both Downton Road and the Britford Park and Ride scheme, which is immediately opposite the site to the south and provides regular bus services to the City Centre.

There are a number of schools within easy walking distance of the site, with Longford Primary School close to the eastern edge of the site, Harnham Infant and Junior school is located to the west and a collection of schools are in the City Centre to the north west, including Wiltshire College. A new school is also proposed as part of the WHSAP allocation at Netherhampton Road.

Salisbury also benefits from Sainsbury's, Tesco and Waitrose superstores in and around the City, as well as a vibrant central shopping area, which includes a wide range of restaurants, bars and café, are all within easy reach of the site.

3.3 Surrounding Facilities Cont.

Image 13: Plan of surrounding facilities

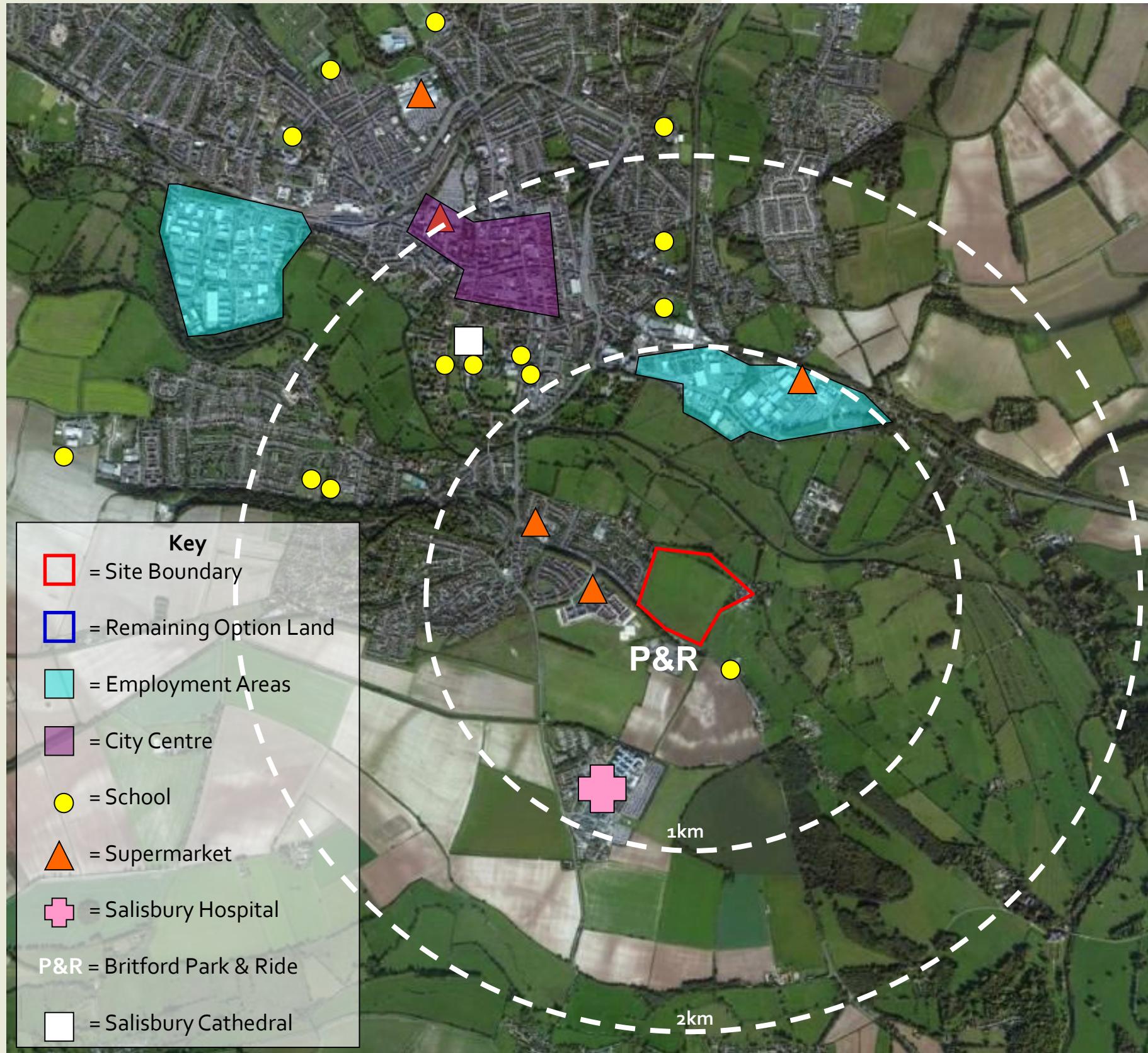


Image 14: View from corner of Downton Road and Lower Road



Image 15: View from Downton Road looking east



Image 16: Britford Park & Ride

### 3.4 Accessibility Assessment

The site is highly accessible being located in close proximity to a range of local services by foot, cycle and public transport including jobs, shopping, leisure facilities and community services.

Regarding pedestrian linkages, the A338 (Downton Road), which runs along the southern boundary of the site, has a lit pavement on the northern side adjacent to the site. This pavement also provides easy access to the Park and Ride terminal on the south side of Downton Road via a traffic light controlled pedestrian crossing.

A public bridleway crosses the northern part of the site connecting Britford Lane and Lower Road to the north west and north east of the site, respectively. Britford Lane together with Downton Road, both provide cycling and walking routes to the City Centre.

The site is within very close proximity to the wider public footpath network. There are two public footpaths that head south, on the opposite side of Downton Road, up the hill towards Salisbury District Hospital. Furthermore, there are a series of footpaths east of Britford, accessible via Lower Road, that lead around and across the River Avon flood plain.

The local roads are conducive to cycling with Downton Road having a shared bus/cycle lane that speeds up direct links to the City Centre. The public bridleway and Britford Lane link to the north and north west are also shown on the Salisbury & Wilton Town Cycle Network, as is Lower Road.

The Britford Park & Ride and bus stops on Downton Road (adjacent Milton Road) are located within an approximately 400m (5 minute walk) of the majority of the site. These stops are served by numerous services which provide high frequency routes to destinations such as Shaftsbury, Ringwood, Bournemouth and Salisbury City Centre.

### 3.5 Highways and Transport

An initial Technical Note has been prepared to assess the site's sustainability credentials, surrounding highways capacity and potential access points.

A summary of the key points are set out below:

- The sustainable accessibility of the site is considered to be good; a full review of sustainable transport infrastructure, both existing and proposed will be undertaken as part of any subsequent work/Transport Assessment.
- An initial review of PIC data concludes that there are no existing safety concerns that are likely to be exacerbated by the development proposals.
- Two proposed vehicular accesses can be achieved from Downton Road to serve a development of approximately up to 475 new homes. The accesses incorporate 6.75m and 10.1m carriageway widths, 10m kerb radii and 2 x 2m footways; the proposed carriageway widths future-proof them as potential bus corridors (if required).
- Specific junction capacity assessments will be undertaken along the local highway network. These will be incorporated into a Full Transport Assessment to be submitted with any planning application.

It is acknowledged that there will need to be further detailed discussions with Wiltshire Council to understand the extent of their requirements prior to any application..

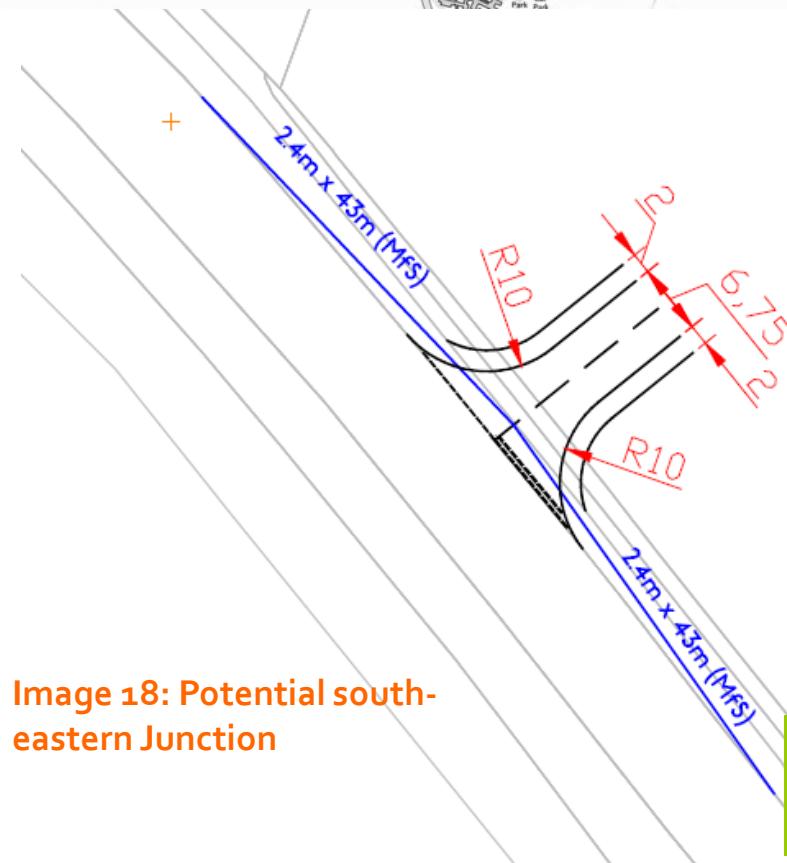
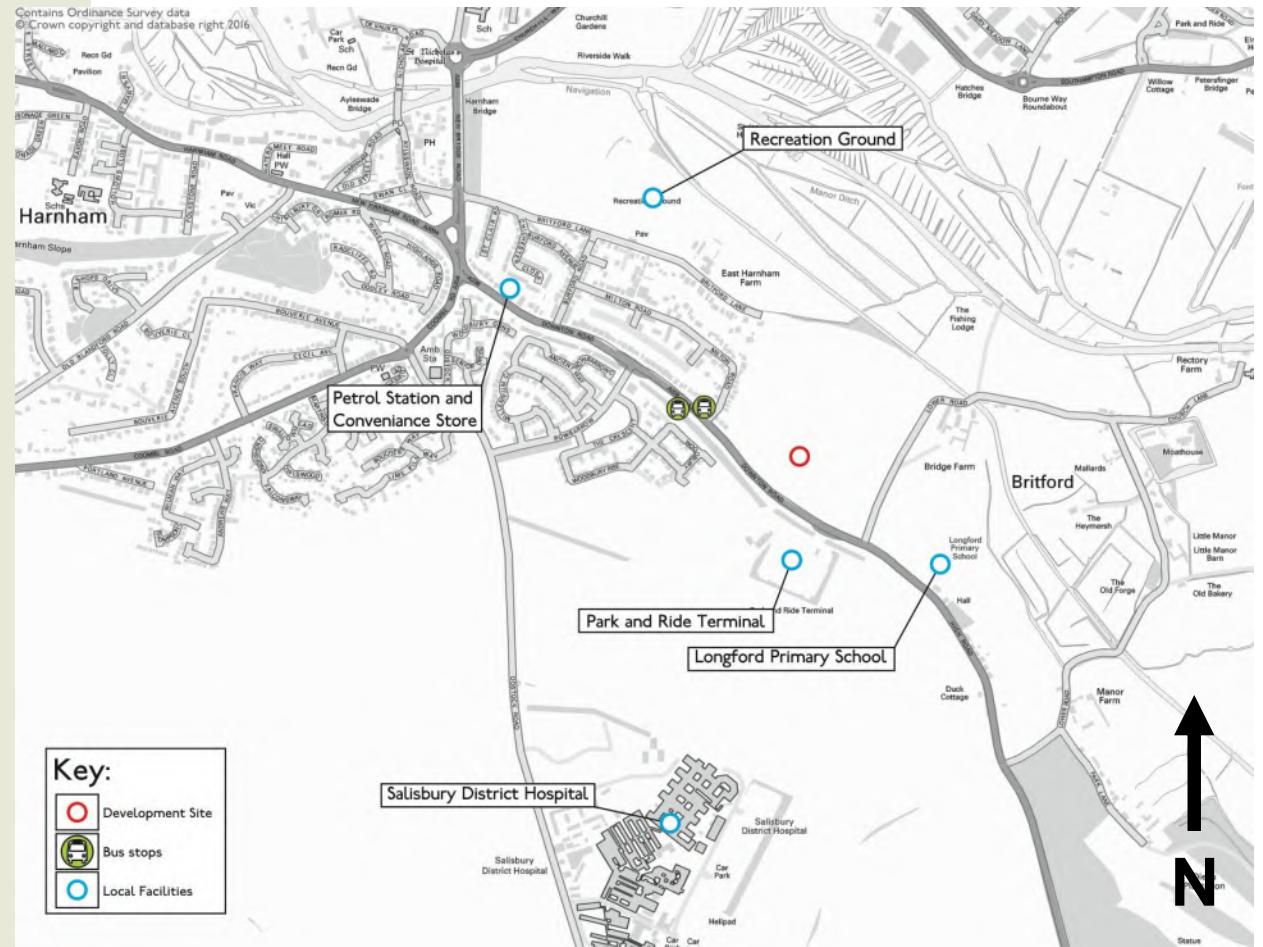


Image 18: Potential south-eastern Junction

### 3.6 Landscape Principles & Green Infrastructure

An initial Landscape and Visual Impact Assessment (LVIA) has been completed to ascertain the current landscape quality of the site, its visual sensitivity and what level of impact the proposed residential development will have.

Regarding landscape the LVIA concluded that:

*"The Site's landscape features are largely contained to the Site boundaries except for a strip of tree, shrub and bramble running along the edge of the public byway in the north of the Site. Site boundary vegetation includes a scattered hedgerow along the southern boundary, occasional small tree planting to the eastern boundary and an established tree belt to the northern Site boundary. The landscape features within the Site are assessed as being of relatively low landscape quality. The majority of the Site comprises an agricultural field which is assessed as being of medium landscape quality."*

*The overall landscape character of the site is typical of the Lower Avon Narrow Chalk River Valley character area, comprising a medium sized field with hedgerow vegetated boundaries and views of the Salisbury Cathedral spire. The site's overall landscape character is assessed as being of medium quality, sensitivity and value."*

The inclusion of several areas of public open space within the proposals will protect the local landscape value, opening up the site for public access with informal recreation opportunities and creating an attractive setting to the development. By incorporating substantial landscape benefits to the site including areas of public open space and children's play space, the effects on the landscape will be minimised.

Views of the proposed development will be limited to neighbouring properties on the edge of Milton Road and Britford Lane as well as users of the public byway and users of Lower Lane and Downton Road. Setting back of the proposed built form from the Conservation Area to the north of the site and at Bridge Farm, as well as the inclusion of public open space to the south east corner, will reduce the prominence of the built form. New tree and hedgerow planting to reinforce site boundaries will also help to reduce the visual effects of the development. The visual impact of the proposed development is assessed as being on overall moderate adverse effect from surrounding receptors.

Overall it is concluded that the site can be developed in the manner proposed, without giving rise to any material landscape or visual effects.



Image 19: Potential access to site and Cathedral vista corridor

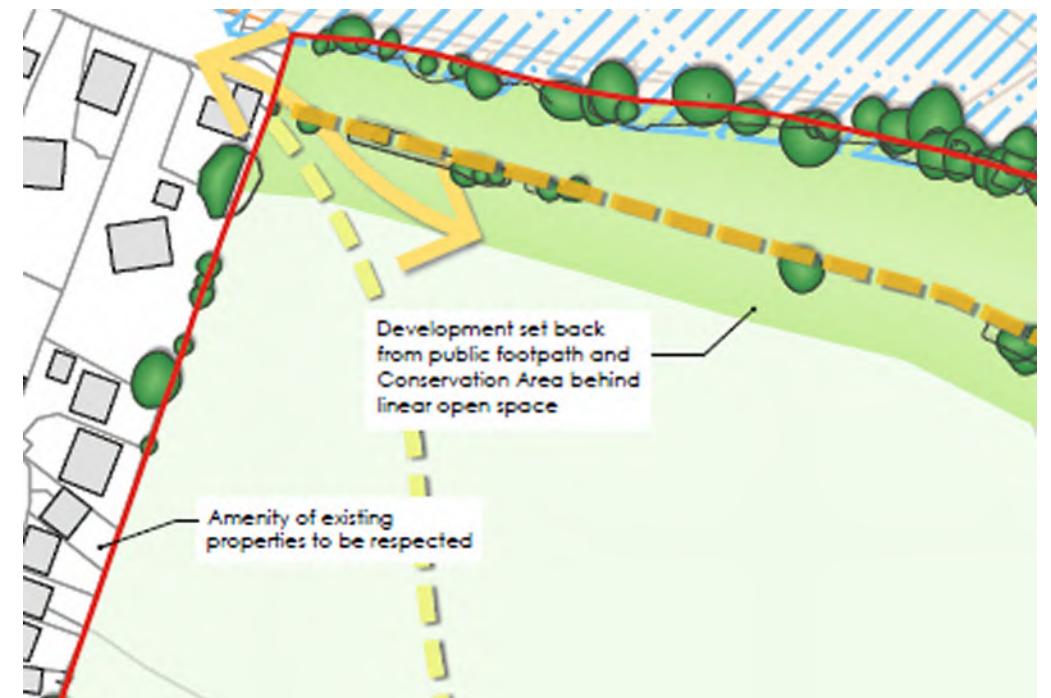


Image 20: Link to City Centre and Public Open Space

### 3.7 Heritage Assessment

An Preliminary Heritage Assessment has been undertaken to fully understand the status and importance of neighbouring and nearby heritage assets, as well as whether the development would impact on any of these assets.

The scheduled ancient monument (SAM) of Woodbury Ancient Villages is located approximately 225m to the south. This monument is screened from the site by residential development and the Britford Park and Ride. Development within the site will not affect the setting or significance of the SAM. The scheduled monument of Harnham Bridge is also not inter-visible with the site.

The grade II\* listed registered park and garden of Longford Castle is located approximately 600m to the south-east. The park and garden is screened from the site by development along the eastern frontage of the A388. Development within the site will not affect the setting or significance of the registered park and garden.

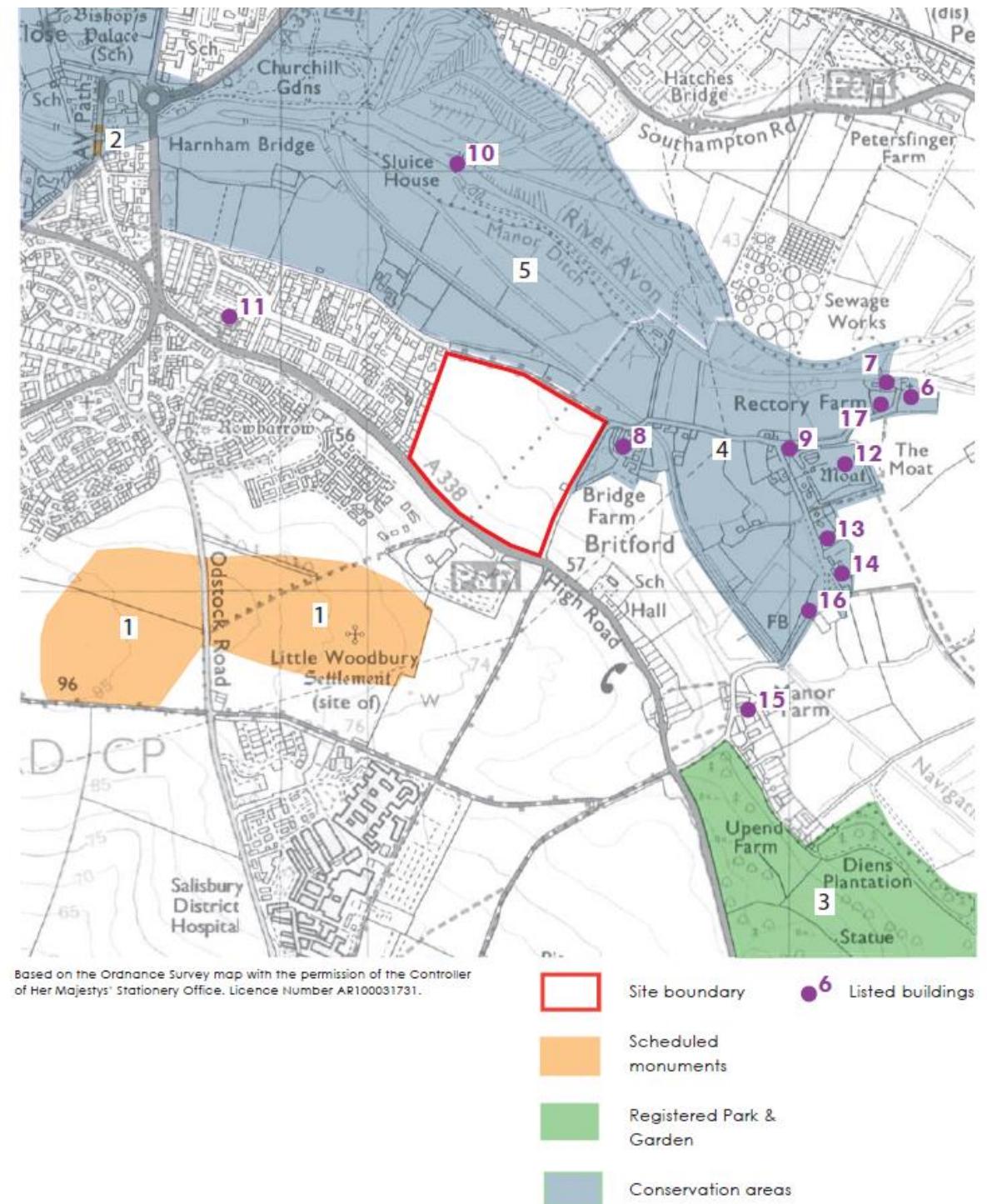
A walkover of the site and its environs has established that it is visible from a complex of buildings at Bridge Farm (number 8 on adjacent map). This complex includes three Grade II listed buildings, which are part of the Britford Conservation Area. The remaining listed buildings shown in the vicinity of the site are well screened from the site and are unlikely to be adversely impacted by the proposed development.

Both the Britford and Salisbury City Conservation Areas respectively bound the north-eastern corner and northern boundary of the site. Therefore, the design and layout of development within the site needs to be sympathetic to the presence of the Britford conservation area including Bridge Farm and also to long range views of Salisbury Cathedral.

The effects on these heritage designations will be fully assessed once the development proposals have been finalised and consultation carried out with Historic England and Wiltshire Council. However, given the scale and scope of the site it is considered that any potential adverse impacts can be avoided or mitigated within the site boundary.

As part of the Heritage Assessment the archaeological merits of the site were also assessed. This assessment identified that there have been numerous finds of archaeological interest in the surrounding area. An initial geophysical survey of the site confirmed that few magnetic anomalies from features of archaeological interest were seen and aside from the detection of one former field boundary, there is no other magnetic evidence for past land use. A full archaeological evaluation can be carried out in due course in order to assess the archaeological potential of the site.

Image 21: Plan of surrounding heritage assets



### 3.8 Ecology

A Phase 1 Ecological Assessment has been carried out for the site, this entailed a walk-over survey conducted with the objective of identifying any ecological constraints associated with any development proposals such as the site's potential to support any legally protected species or habitats of high nature conservation value.

The River Avon Special Area of Conservation (SAC) and River Avon System Site of Special Scientific Interest (SSSI) lies immediately adjacent to the site's northern boundary. The East Harnham Meadows SSSI is located within 200 metres of the site. The site also falls within 15km of the Salisbury Plain SAC / Special Protection Area (SPA). To address impacts on the international designations, contributions and/or CIL payments can be made to the Salisbury Plain SPA HRA Mitigation Strategy (May 2018) and Phosphate Memorandum of Understanding and associated Interim Delivery Plan, or any successor document / strategy. A Construction Method Statement will also be prepared and implemented in due course to ensure protection of the water quality of watercourses and groundwater during construction. A buffer zone between the River Avon SSSI / SAC and the developable part of the site is recommended to best protect this ecological asset.

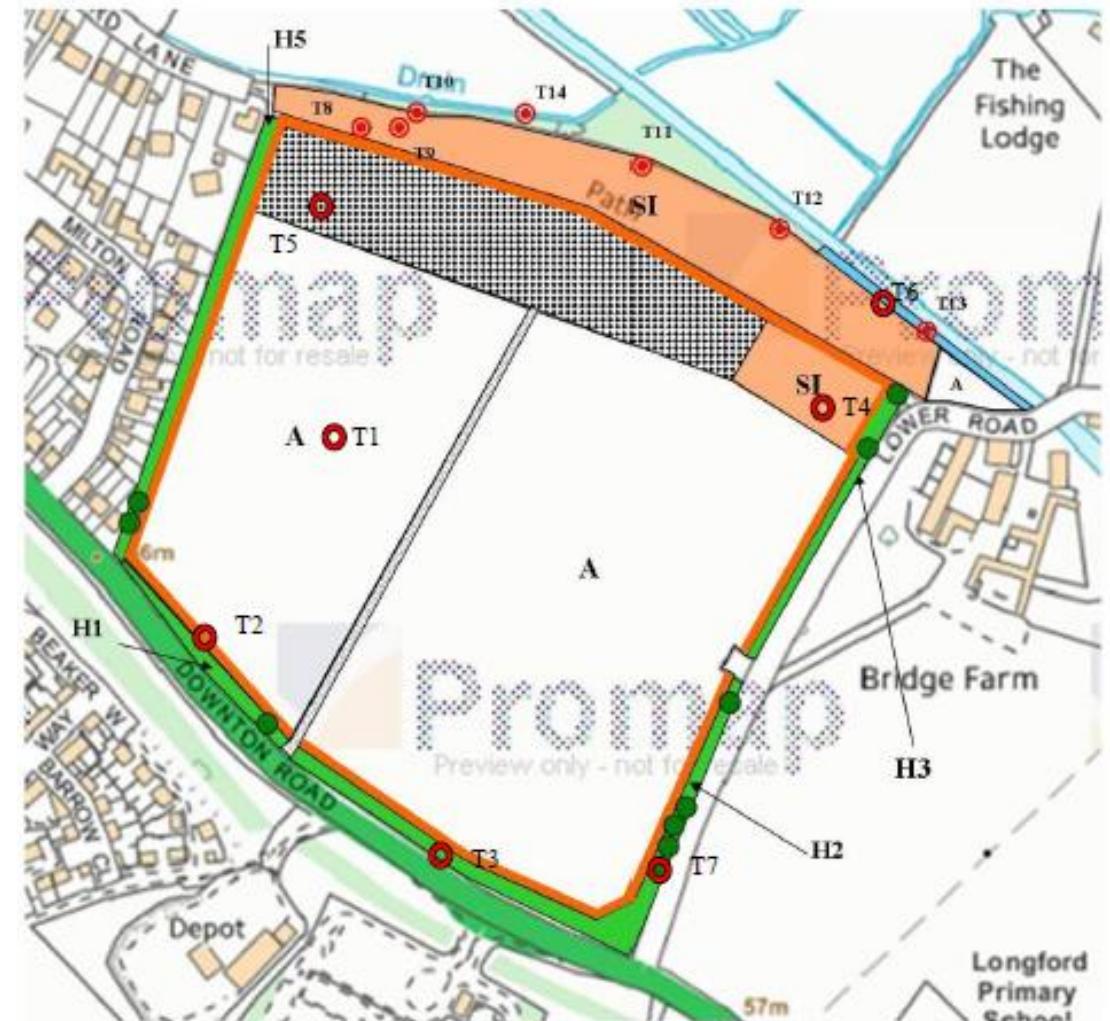
The initial Phase 1 assessment of the site and the adjacent River Avon shows that the area includes habitat potentially be suitable to support the following species:

- Badgers
- Bats
- Reptiles
- Great Crested Newts
- Breeding Birds
- Dormice

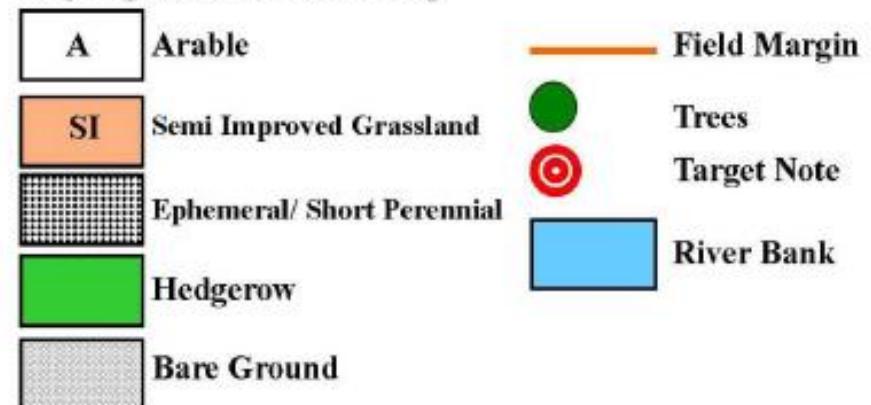
Phase 2 surveys will be undertaken to ascertain the presence, or absence, of the above species. However, in the first instance the ecological study recommended the following to be incorporated in the design of the scheme.

- Provision of bat boxes and nest boxes for bird species
- Sowing proposed amenity grassland with a wildflower lawn mix
- Use of native shrubs and trees for landscaping schemes
- The creation of a wildlife pond to encourage amphibians, water voles and invertebrates can be incorporated into the design.

Image 22: Phase 1 habitat map



Key to phase one habitat map



### 3.9 Sustainable Urban Drainage and Flooding

The site lies outside of the River Avon flood plain and within flood zone 1. The wider flood plain around the River Avon and its tributaries run immediately adjacent to the northern boundary of the site. This demonstrates that the site has been assessed as having a less than 1 in 1,000 annual probability of river or sea flooding (<0.1%). However, there are small areas of the north east part of the site that are identified as having some potential for surface water flooding. Development will avoid all areas at risk from flooding.

The NPPF requires that a site-specific Flood Risk Assessment is undertaken for sites that are over 1 hectare in size, or there are surface water flood risks, even if they are located in Flood Zone 1. As such a site specific Flood Risk Assessment will be undertaken prior to any application. This will clarify the extents of any potential flood risk areas within the site.

The site's topography shows that it generally slopes from south down to north, towards the River Avon. The high point of the site is the boundary with Downton Road itself. The site itself offers a wide range of opportunities to include Sustainable Urban Drainage solutions to surface water.

As the site is greenfield, the surface water drainage run off rate post-development should not exceed the existing rate of the site in its current use. The site offers a wide range of opportunities due its size and existing topography to incorporate a positive drainage strategy.

As stated in the previous page, the River Avon SAC lies directly north of the site and the site is also located within a Source Protections Zone. Special care will need to be taken to ensure these assets are protected..

As part of any application a detailed FRA and drainage assessment to show the precise solution as well as the location of any drainage ponds or features considered necessary will be provided. The indicative masterplan shows an indicative area of SUDs at the lower points of the site. The final drainage solution will be developed alongside the evolving masterplan proposals.

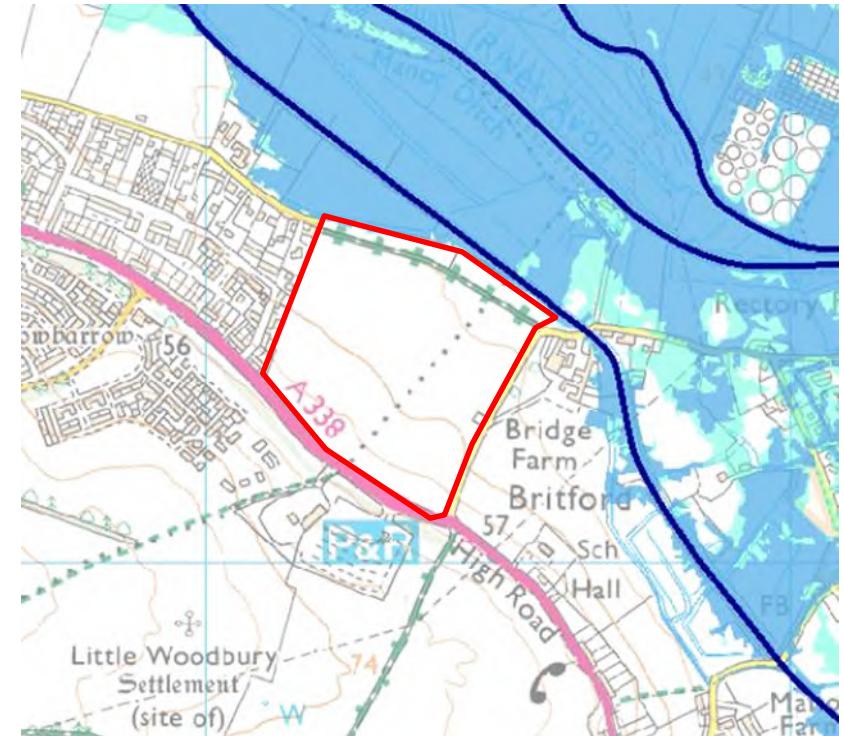


Image 23: Flood risk map (rivers and sea)



Image 24: Flood risk map (surface water)

# 4.0 Masterplan

## 4.1 Opportunities and Influences

The Site Assessment section of this Statement has highlighted a number of opportunities and influences that will have impact on the developable area of the site, the masterplan and the final layout. A plan showing the opportunities and influences set out below is shown on the following page.

### Opportunities

- The site offers views from Downton Road across to Salisbury Cathedral.
- The site is located on a main route into the City, and can provide a new 'gateway' to Salisbury. The site has a long frontage with Downton Road can facilitate multiple access points.
- There are a number of surrounding footpaths and public transport links, including the Public Right of Way to the north of the site and the Britford Park & Ride to the south. The masterplan should make the best use of these assets by enhancing permeability and providing the necessary pedestrian links to encourage non-vehicular modes of transport.
- The site is located within a minerals potential area.
- Capable of providing new open space provision for new and existing residents.
- The site is of sufficient scale to provide land for new community infrastructure such as a new school, if required.

### Influences

- The Britford Conservation Area is located to the North West of the site, which includes the Grade II listed Bridge Farm. The development will need to be respectful of the setting of this building, and the Conservation Area in general.
- There are properties fronting Milton Road, Downton Road and Britford Lane that back on to the Western boundary of the site. The amenity and privacy of residents of these properties will need to be taken account of in the masterplan.
- A small area of land north of the Right of Way is identified as being at risk from flooding. Development will avoid these areas.
- The existing hedgerow along the sites southern boundary with Downton Road should be maintained to provide a visual and noise screen to protect the amenity of new residents.
- The Salisbury Parish and Britford Parish boundaries bisect the site from north to south.



Image 25 View west along Downton Road



Image 26: Opportunities and Influences Plan



## 4.2 Indicative Masterplan

Based on the opportunities and influences of the site two masterplan options have been developed. These are shown on the following page, with the key elements described below:

- A net developable area of over 10ha is achievable across the whole site and could provide up to c.350 new homes depending on the masterplan option selected.
- An area of open space has been provided at the entrance of the site at the corner of Downton Road and Lower Road to provide a visual gateway into the site. Further open space is located along the northern edge of the site. Over 4ha of open space can be provided across the whole site.
- A key route through the site has been defined by the view of Salisbury Cathedral. The area at the end of this route has been left undeveloped to preserve and frame this view and a view corridor has been created through the site from this access point.
- Existing vegetation boundaries around the site, and adjacent to the existing public right of way will be retained and enhanced (where necessary).
- Two play areas have been shown at opposite ends of the site to ensure they are easily accessible for both future and existing residents in the local area. Play provision can therefore be phased to allow one area to come forward within the Salisbury Parish area, and the second area to be available as part any future housing allocation.
- The setting of the Britford Conservation Area, the listed building at Bridge Farm and the River Avon river valley as a whole have been respected by way of an area of open space that runs along the northern boundary of the site, and widens in the north west corner. This will be both sides of the existing Right of Way.
- Two potential access points are shown, one will utilise the existing traffic light system which serves the Britford Park and Ride and the other will be a second point of access further west along Downton Road that can serve the Neighbourhood Plan part of the site. Pedestrian links to the existing right of way and across to the Britford Park and Ride have been added to increase permeability.
- The density of the scheme will vary, with the more rural edges of the development (to the north and east) being of a lower density to reflect the character of these parts of the site. A logical street pattern has been shown to maximise the site's development potential, but to also ensure the scheme is both permeable and legible.
- An indicative location for Sustainable Drainage Systems is highlighted in the north west corner of the site, which is the lowest point and acts as a natural drainage point.
- Provision for a new school, were this deemed necessary to support new housing development at the site. The location of the school is shown as being located within the Britford Parish area but could also be delivered within the Salisbury Parish area.



Indicative Masterplan: Option A (c. 350 new homes)



- 0 20 40 60 80 100 metres
- Site boundary: **13.45ha**
  - Potential residential area: **9.57ha**
  - Potential public open space: **3.80ha**
  - Existing vegetation
  - Proposed landscaping
  - \* Potential location for children's play areas
  - \* Potential location for SuDS feature
  - Potential vehicular access points
  - Public Right of Way (PRoW)
  - Parish Boundary

## Indicative Masterplan: Option B (c. 290 new homes)



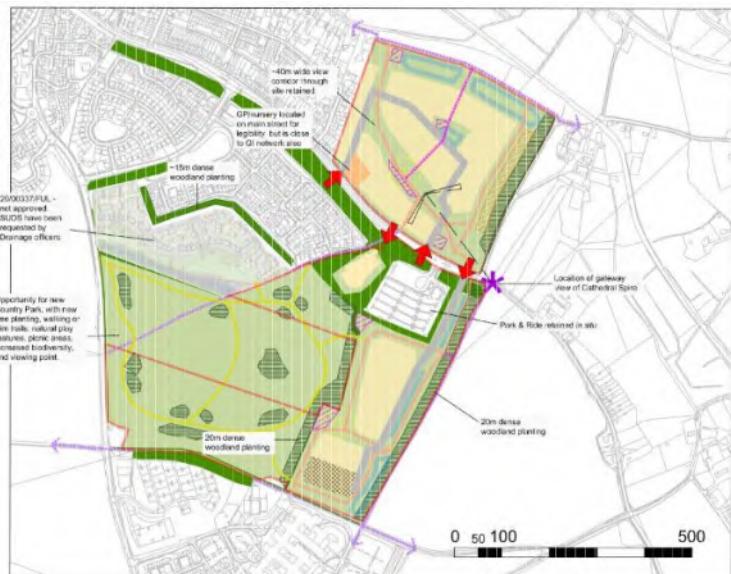
View point A - Key view towards Salisbury Cathedral

57m

## 4.2 Conformity with Council's Concept Plans

The Salisbury Report set out Concept Plans (images below) for sites proposed for allocation. The Persimmon Masterplan Options (images to right) contained in the Deliverability Statement, particularly Option A, broadly conforms to the development principles and Concept Plans sets out in the Salisbury Report. However, there are a number of instances where the Persimmon's design approaches diverges from that of the Council. The key difference are summarised in the supporting representations submitted alongside this Deliverability Statement.

Persimmon would welcome discussion with officers with a view to resolving these differences to allow the high-quality development to come forward at the site.



# 5.0 Conclusions

## 5.1 Sustainability Appraisal and Planning Benefits

The Downton Road scheme will provide a number of benefits and, as summarised below, will deliver the sustainable development objectives set out in the NPPF.

### Economic Role\*

- Provide much needed family and affordable housing within the Salisbury housing market area which will encourage economic growth and address ageing workforce trends;
- Provide appropriate contributions towards local infrastructure and ensure long term viability of local services;
- Create 575 person years of direct construction employment, which equates to around 240 full time jobs per year
- New residents would provide a total expenditure of around £8.5m to inject into local goods services.
- Provide £418,000 in Council Tax receipts (per annum) and a further £2.5m from the New Homes Bonus.
- CIL and Section 106 contribution would also be provided to the Local Authority.

### Social Role

- The site is well placed and well connected to adjacent residential development and local services, including the Britford Park & Ride;
- The site is well serviced by local footpath and cycle routes, including a public byway which crosses the northern part of the site. This, along with the regular bus services that run along Downton Road, should encourage sustainable travel;
- The site would deliver much needed high quality homes and create a positive built environment for future residents, whilst protecting the amenity of existing residents;
- The site can deliver high quality and accessible open space and a local play area to serve the new residents and those who leave nearby;
- Development will help support local services;
- The site will deliver much needed affordable housing which meet the policy requirements set out by the Council.
- Potential land for new education facilities.

\*Economic activity statistics relate to site as a whole (i.e. land in both Salisbury and Britford Parish areas)

### Environmental Role

- The site will be developed in a way to mitigate any environmental harm.
- A phase 1 ecology study has been undertaken and the recommendations have helped shape the masterplan.
- A phase 2 ecology study are also underway to ensure that species and habitats are protected and enhanced, where possible.
- The site will be environmentally sustainable through the provision of energy and water efficient buildings. New homes can be of timber frame construction, which are prepared in a factory setting, which reduces environmental impact and waste. The construction techniques employed in the new development will help to meet climate change minimisation goals.
- The site can deliver substantial new green infrastructure through the provision of new areas of open space and SuDS features and will allow for ecological enhancements.

The sustainability of the site was assessed by Persimmon Homes using Wiltshire's Sustainability Appraisal methodology developed to assess sites for the WHSAP. The results of this assessment that was submitted to the Council showed the site to be a sustainable option for new housing development. This document is available on request.



Image 27 NPPF Sustainable Development Objectives

## 5.2 Deliverability Appraisal

Central Government Planning Practice Guidance states that for a site to be considered deliverable it must be suitable, available and achievable. The Council's most recent SHELAA highlights that the site is deliverable against these three measures. The following section sets out how the proposal accords with each of the deliverability aspects.

### Suitability

- The site is well located in relation to services, public transport links and is a clear part of the Salisbury market area. Recent development of land south of Downton Road shows the market attractiveness of the local area, whilst the pressure on the City as a whole to meet its housing needs shows that overall demand for new housing is high.
- There are no physical limitations to accessing the site.
- Landscape, highways, ecology, archaeology and heritage assessments show that any potential adverse impacts can be fully mitigated.
- The site's scale and surroundings offers the opportunity to provide generous landscaping and buffers between surrounding and proposed land uses to ensure that both existing and new residents enjoy a positive living environment.
- Wiltshire Council have acknowledged that there is a need for housing in Salisbury, and that past under-delivery cannot be allowed to continue.
- The supporting documents to the Wiltshire Housing Site Allocations Plan (WHSAP) identify the site as having development potential.

### Availability

The site is wholly under option with Persimmon Homes. The landowner is fully committed to the delivery of residential development on the site and there are no known legal issues that would prevent the delivery of the site moving forward.

### Achievability

The site is viable. Persimmon Homes is one of the largest house builders in the Country, having delivered a number of schemes of this nature and scale both nationally and locally, the Company has the financial strength and commitment to ensure that the site is delivered in a timely fashion.

The Company has vast experience and a track record of delivering strategic housing sites, and have worked notably in Salisbury in the past. At the very local level, the Cathedral Gardens development which is located on the south side of Downton Road was delivered by Persimmon Homes. The Downton Road, Salisbury site is, therefore, considered achievable for residential development.



**Image 28 View west across the site**



**Image 29 View west along Downton Road**

### 5.3 Summary

The site has been subject to a number of detailed technical assessments, which have not highlighted any insurmountable constraints to development. The site is described in Wiltshire Council's SHELAA as being suitable, achievable/viable and available now for development. The proposal represents sustainable development under the definition of the NPPF and can provide a number of social, economic and environmental benefits. The site is located close to a variety of services / facilities and public transport opportunities, and is capable of facilitating the delivery of new community infrastructure - for example, land for new school - if this is required.

This Deliverability Statement has reviewed the context of the site, and looked in detail at the opportunities and influences that can influence the deliverability of new homes. Two masterplan options have been developed which take account of the site's strengths and influences, and clearly demonstrates that a well designed residential development can be delivered.

The section of the site that is located within Salisbury Parish area is capable of delivering approximately 190-250 new homes, depending on whether land for a new school is included as part of the land use mix. The density applied to the design is a reflection of neighbouring development, including both the older residential areas to the west, and newer areas to the south and south west.

The scheme is deliverable, Persimmon Homes is one of the largest house builders in the Country. The Company's commitment to building houses means that the site can be delivered quickly following the grant of a satisfactory planning permission.

If supported by the Neighbourhood Plan Group, Persimmon Homes could proceed with an application swiftly. The site is capable of providing much needed housing (including affordable housing) in Salisbury. The allocation of the site for housing would also ensure that the new homes could contribute to Wiltshire's 5-year land supply, which will help protect against speculative housing applications in and around Salisbury.



Image 30: Masterplan Proposal



Image 31: Persimmon Site

**STRAT368**

Date: 09 March 2021  
Our ref: 339188



Customer Services  
Hornbeam House  
Crewe Business Park  
Electra Way  
Crewe  
Cheshire  
CW1 6GJ

T 0300 060 3900

Dear Sirs,

## **Wiltshire Council Local Plan Review**

Thank you for your consultation on the above dated 11 January 2021

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

We welcome Wiltshire Council's engagement with Natural England from an early stage in the process, we note there are currently no changes to specific policy, therefore we provide broad advice on the plans strategy and what should be considered when developing policy. In addition we will provide advice on each principal settlement and market town where the council has determined allocations moving into the final pool of sites to be assessed in the plan period 2016-2036. We wish to acknowledge that this response is considered as part of an iterative approach to plan design with Wiltshire council and look for to further discussion.

Natural England's main concern at this stage is that the new local plan ensures development is directed to the most sustainable places and provides high quality green/ open space for new and existing communities. We would expect to see suitable policies that address the impacts of increased recreation on local green spaces, and for designated sites and landscapes, by ensuring its effects are properly managed.

Natural England is concerned about the effects of recreation on international and national designated sites within and beyond the local plan area. The impacts of recreational use is widely recognised as a significant issue impacting on designated sites. Recreational impacts can include soil compaction/loss and eutrophication from dog fouling.

### **Emerging Spatial Strategy**

#### **The Plan's vision and strategy**

Natural England advises that the Plan's vision and emerging development strategy should address impacts on and opportunities for the natural environment and set out the environmental ambition for the plan area. The plan should take a strategic approach to the protection and enhancement of the natural environment, including providing a net gain for biodiversity, considering opportunities to enhance and improve connectivity. Where relevant there should be linkages with the Biodiversity Action Plan, Local Nature Partnership, Area of Outstanding Natural Beauty Management Plans, Rights of Way Improvement Plans and Green Infrastructure Strategies and Nature Recovery Network.

#### **Sites of Least Environmental Value**

In accordance with the paragraph 171 of NPPF, the plan should allocate land for development with the least environmental or amenity value. Natural England expects sufficient evidence to be provided, through the SA and HRA, to justify the site selection process and to ensure sites of least

environmental value are selected, e.g. land allocations should avoid designated sites and landscapes and significant areas of best and most versatile agricultural land and should consider the direct and indirect effects of development, including on land outside designated boundaries and within the setting of protected landscapes. Further, outside designated sites and local wildlife sites all allocations should ensure known priority habitats are avoided and ensure that potential allocations supporting permanent grassland are supported by a preliminary botanical assessment so as to ensure they do not support significant grassland interests (see comments below on priority habitats, ecological networks and priority and/or legally protected species populations).

### **Designated sites**

The Local Plan should set criteria based policies to ensure the protection of designated biodiversity and geological sites. Such policies should clearly distinguish between international, national and local sites<sup>1</sup>. Natural England advises that all relevant Sites of Special Scientific Interest (SSSIs), European sites (Special Areas of Conservation and Special Protect Areas) and Ramsar sites<sup>2</sup> should be included on the proposals map for the area so they can be clearly identified in the context of proposed development allocations and policies for development. Designated sites should be protected and, where possible, enhanced.

## **Habitat Regulations Assessment – Screening and Scoping**

Natural England welcome iterative dialogue over the points that have been raised and are dedicated to working with the council and Land Use Consultants (LUC) to reach a solution that assists the council and delivers positive environmental outcomes for the inhabitants of Wiltshire.

### **General guidance and comment on HRA**

The HRA is linked from the council's consultation page as a screening document however the document is titled as scoping. Natural England believe this document to be both the screening and scoping stage and should be labelled accordingly.

As of 1 January 2021, the Conservation of Habitats and Species Regulations 2017 (as amended) and the Conservation of Offshore Marine Habitats and Species Regulations 2017 (as amended) have both been amended so that they continue to operate effectively now that the transition period has ended and the UK has completed its exit from the EU.

The changes that are now in force have been made by the [Conservation of Habitats and Species \(Amendment\) \(EU Exit\) Regulations 2019](#). The changes ensure the strict protections afforded to sites, habitats and species as derived from the EU Habitats and Wild Birds directives continue. Most of these changes involve transferring functions from the European Commission to the appropriate authorities in England and Wales.

All other processes (such as HRA) and terms (such as SACs, SPAs and European Sites) found in the 2017 Regulations remain unchanged and existing guidance is still relevant. Natural England note that your HRA makes reference to 'Natura 2000' sites, please cross reference your HRA screening scoping with new current guidance.

Defra and Welsh Government have published their new HRA Guidance on GOV.UK at <https://www.gov.uk/guidance/habitats-regulations-assessments-protecting-a-european-site>.

Accompanying this is a new derogation notice template for competent authorities to use <https://www.gov.uk/government/publications/habitats-regulations-assessment-derogation-notice> .

In addition there is also new guidance for competent authorities on their duty to help protect, conserve and restore European sites <https://www.gov.uk/guidance/duty-to-protect-protect-restore-european-sites> (which covers the obligations derived from articles 6.1/6.2 of the habitats directives

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<sup>1</sup> International sites include: Special Protection Areas (SPAs); Special Areas of Conservation (SACs) and Ramsar sites<sup>1</sup>. National sites include Sites of Special Scientific Interest (SSSIs) and National Nature Reserves (NNRs) Local sites include wildlife Sites or geological sites (a variety of terms are in use for local sites).

<sup>2</sup> The following wildlife sites should also be given the same protection as European sites: potential SPAs, possible SACs, listed or proposed Ramsar sites and sites identified, or required, as compensatory measures for adverse effects on European sites

which from part of the general regulation 9 duty).

Natural England agrees with the approach taken to assess European sites within and extending beyond the county boundary. Reviewing the information provided we agree that all European sites have been identified correctly for HRA screening.

4.4 The HRA makes an assumption that only sites within the county boundary will result in physical damage or loss of habitat, however, increase in recreational pressure can lead to physical damage on the features for which European sites are designated for. Natural England suggest further work is required to understand the level of recreational pressure outside the county boundary to assess likely significant effect of its plan and policies. This is evident in paras 4.41 – 4.46 of your HRA.

4.23 Water voles are a distinctive/typical species supported by the River Avon SAC habitat. A water vole mitigation strategy should be discussed and agreed with Natural England. Similarly, **otters** also make an important contribution to the structure, function and/or quality of the SAC habitat, and the EIA will fully assess the impacts of the scheme on this species. This should be noted within the HRA.

4.34 Natural England support the application of this guidance and notes the inclusion of an in-combination assessment for air pollution.

4.39 Natural England advises that the final pool of assessment sites at Salisbury (namely site 6) has potential to increase traffic on the surrounding road network particularly the A338 and A36 both of which are at various points within 200m of the River Avon SAC. Natural England advise scoping in air pollution when considering impacts on the River Avon SAC and continuing to the Appropriate Assessment stage.

Increases in housing in settlement area such as Bradford-on-Avon, Corsham, Marlborough and Trowbridge will lead to increase vehicle movement in areas near or next to internationally designated sites notified for habitats that are sensitive to changes in air quality and should be assessed.

4.40 Requires clarification.

4.47 Natural England note that site 1 (SHELAA reference 662) is within 7km of Pewsey Down SAC. Increase housing within Devizes has potential to increase recreational disturbance at this designation. Natural England therefore consider that Pewsey Downs SAC should not be scoped out and should continue to the Appropriate Assessment stage

Table 4.2 noted required change to ZOI for North Meadow and Clattinger Farm SAC (NE have agreed a reasonable precautionary figure)

Natural England is confirming the ZOI for Cotswold Beechwoods.

### **Internationally Designated Sites Strategic Solutions Trowbridge Bats SPD (Bath and Bradford on Avon Bat SAC)**

The Trowbridge Bat Mitigation Strategy (TBMS) SPD was adopted in February 2020 to assist developers in assessing the potential impacts on Wiltshire's bat populations and to assess the impacts of future housing within the Wiltshire Housing Site Allocation Plan.

Natural England advises that additional sites proposed will need to be assessed in relation to TBMS and subsequently their impacts on the Bath and Bradford on Avon Bat SAC.

In particular the local plan must give consideration for its ability to contribute to the potential designation of Trowbridge Woods SSSI. TBMS is underpinned by an evidence base dating back to 2005 which gives us an understanding of the history of usage by bats in the Trowbridge area. Natural England advise that this evidence base requires updating to further consider the use of functionally linked habitat, specifically the area known as the Hilperton Gap, by bats species in the south of Trowbridge to the North West and the wider impacts on the Bath and Bradford on Avon Bat SAC.

### **River Avon SAC**

Natural England recognises the requirement to amend this policy in light of recent agreement between Natural England the Environment Agency, Wessex Water and Wiltshire council. We recognise the challenges faced with conformity with NPPF to conserve and enhance the special qualities of the River Avon SAC and delivering government driven housing targets. Natural England acknowledge the councils drive to work collaboratively with partners to promote nutrient neutral development within the River Avon system catchment in a joint partnership to achieve favourable conservation status.

The agreed strategic solution for ensuring residential developments achieve phosphorous neutrality on the River Avon is a matter for the Wiltshire Council who have undertaken to underwrite the scheme, not Natural England. Proposals that are accepted by your Council into the mitigation strategy may rely on the standard Appropriate Assessment that has previously been agreed by Natural England. However, those developments that your Council considers ineligible for the agreed strategic approach will require a bespoke Appropriate Assessment completed by the competent authority in accordance with Regulation 63 of the Conservation of Species and Habitats Regulations 2017 (as amended).

Consideration will also need to be given to the additional pressure on water resources in the future, in particular with climate change and the increasing trend for consecutive dry summers to impact on the river ecology. In the future it may be that Wessex Water needs to take further action to reduce abstraction at these sensitive times to protect the River Avon SAC.

### **Salisbury Plain SPA**

Since this plan considers further sites for assessment will result in a net increase in residential accommodation, impacts to the Special Protection Area(s) and Ramsar Site(s) may result from increased recreational disturbance. Your authority has measures in place to manage these potential impacts through the agreed strategic solution which we consider to be sound.

Subject to the appropriate financial contribution being secured, Natural England is satisfied that the proposal will mitigate against the potential recreational impacts of the development on the site(s).

### **North Meadow and Clattinger Farm SAC**

Through the work with Swindon BC on their local plan review it has been determined that recreational disturbance is impacting upon the notified features of North Meadow and Clattinger Farm SAC. Discussions with Swindon BC, Cotswold DC, Wiltshire council and NE are ongoing. LUC are developing the evidence base to underpin a strategic solution for North Meadow and Clattinger Farm SAC.

In respect of this SAC we acknowledge the provisional status of the 7km threshold applied for screening purposes. Given the precautionary nature of assessment under the Habitats Regulations it is important to state this distance threshold will need to be reviewed once up to date visitor survey information is available.

### **New Forest International sites**

Natural England advises that all sites within the zone of influence of the New Forest SAC, SPA and Ramsar site will need to avoid recreational impacts. We welcome further discussion on how the council should approach this.

### **Interim Sustainability Appraisal**

In our view, the Sustainability Appraisal provides a fair and detailed assessment of the sustainability performance of the priorities, building blocks, guiding principles and various policy and locational options for accommodating growth and new development. It identifies a number of aspects that could be strengthened and makes recommendations for subsequent stages of the local plan, all of which Natural England would support, particularly with respect to making more explicit the role of GI in addressing the effects of climate change and the health benefits of enhancing access to green space and active travel.

Natural England understands that Wiltshire council are aware of recreational pressure on designated sites, we recommend that strategic approaches to mitigating and managing this issue should be discussed with New Forest DC to meet the duty to cooperate. Designated sites and landscapes are the heart of nature recovery and ecological networks and we consider that the issue of recreation on these assets is significant and will require more specific consideration in the SA and HRA as part of the local plan review.

Given the challenge of meeting raised ambitions across many of the Plan's priorities, the SA is an important tool for furthering integration of objectives and policies and helping to avoid 'trade-offs' between what can be viewed as conflicting goals.

Based on the level of assessment carried in conjunction with the final pool of potential sites for further detailed assessment Natural England offer the following comments.

### **Empowering rural Communities**

#### **Revised Core Policy 44**

iv. Suggest bolstering, 'development will not negatively impact upon national and international biodiversity and landscape designations'. Rural exception sites should also provide net gains for biodiversity and where adverse impacts on landscape designations are unavoidable then appropriate compensation measures that will help deliver the objectives of the AONB management plan should be sought.

### **Addressing climate change and biodiversity net gain through the Local Plan – raising the ambition**

The Local Plan should consider climate change adaption and recognise the role of the natural environment to deliver measures to reduce the effects of climate change, for example urban tree planting to moderate heat island effects. In addition factors which may lead to exacerbate climate change (through more greenhouse gases) should be avoided (e.g. pollution, habitat fragmentation, loss of biodiversity) and the natural environment's resilience to change should be protected. Green Infrastructure and resilient ecological networks play an important role in aiding climate change adaptation.

See **appendix A** for further detail on how to integrate climate change adaptation into the local plan.

#### **Policy Theme 1 – Tackling Flood Risk and Promoting Sustainable Water Management**

Natural England strongly recommends that all new development adopt the higher standard of water efficiency under the Building Regulations (which equates to 110 litres /head/day including external water use) and re-use in line with best practice.

Natural England supports the use of multi-functional retro fitted SuDS. The management of surface water run-off through well designed wetlands can be used as an opportunity to improve the quality of GI and create biodiverse areas. The options that exist include balancing pools, wetlands (often in the form of filtration reedbeds), ditch systems, swales, rain gardens and permeable surfaces. Water input can come from any part of a site, including roofs, and may be of a cleaner quality than in surrounding urban or agricultural settings, allowing the creation of high quality wetland and aquatic habitat. SUDs for new development and retro fitted SUDs to existing urban areas can also play a useful role in reducing nutrient pollution to water courses.

Such habitat can also serve pollinators in a number of ways. The larvae of many pollinators develop in shallow water, wet mud or the vegetation associated with water margins. Water margins can also be very flowery habitats featuring plants such as Angelica, Water Mint, Gypsywort, Yellow Iris, Greater Bird's-foot Trefoil, Marsh Woundwort, Great Willow herb and a variety of willows. As such, they have the potential to act as hotspots of pollinator activity from spring until early autumn. SuDS can also buffer against the effect of prolonged summer droughts, providing damp flowery habitats

when that of the surrounding landscape has disappeared. If they are combined with low topography, they can also provide opportunities for ground nesting bees and wasps.

. The requirement to use a SuDS should be built into the specification of a new development scheme from the outset. A good online accounts of how SuDS can be designed for wildlife are available from the

RSPB/WWT : [https://www.rspb.org.uk/Images/SuDS\\_report\\_final\\_tcm9-338064.pdf](https://www.rspb.org.uk/Images/SuDS_report_final_tcm9-338064.pdf)

## **Policy Theme 2 – Enhancing Green/ Blue Infrastructure (GBI) and biodiversity**

Green infrastructure refers to the living network of green spaces, water and other environmental features in both urban and rural areas. It is often used in an urban context to provide multiple benefits including space for recreation, access to nature, flood storage and urban cooling to support climate change mitigation, food production, wildlife habitats and health & well-being improvements provided by trees, rights of way, parks, gardens, road verges, allotments, cemeteries, woodlands, rivers and wetlands. The economic value of urban parks is now increasing understood, for example:

<https://thelandtrust.org.uk/the-land-trust-charitable-aims/thebenefits/>

More recent studies have also been completed for the parks within the Bournemouth conurbation.

Green infrastructure is also relevant in a rural context, where it might additionally refer to the use of farmland, woodland, wetlands or other natural features to provide services such as flood protection, carbon storage or water purification.

A strategic approach for green infrastructure is required to ensure its protection and enhancement, as outlined in para 171 of the NPPF. Green Infrastructure should be incorporated into the plan as a strategic policy area, supported by appropriate detailed policies and proposals to ensure effective provision and delivery. Evidence of a strategic approach can be underpinned by Green Infrastructure Strategy. We encourage the provision of green infrastructure to be included as a specific policy in the Local Plan or alternatively integrated into relevant other policies, for example biodiversity, green space, flood risk, climate change, reflecting the multifunctional benefits of green infrastructure.

The Plan should set out a strategic approach, planning positively for the creation, protection, enhancement and management of networks of biodiversity. Where appropriate there should be consideration of geodiversity conservation in terms of any geological sites and features in the wider environment.

A strategic approach for networks of biodiversity should support a similar approach for green infrastructure (outlined below). Planning policies and decisions should contribute and enhance the natural and local environment, as outlined in para 170 of the NPPF. Plans should set out the approach to delivering net gains for biodiversity.

Net gain for biodiversity should be considered for all aspects of the plan and development types, including transport proposals, housing and community infrastructure. The plan's approach to biodiversity net gain should be compliant with the mitigation hierarchy, as outlined in paragraph 175 of the NPPF ensuring that the loss of priority habitats is where possible avoided. The policy should also ensure that biodiversity net gain is not applied to irreplaceable habitats and should also make clear that any mitigation and/or compensation requirements for European sites should be dealt with **separately** from biodiversity net gain provision.

Policies and decisions should first consider options to avoid adverse impacts on biodiversity from occurring. When avoidance is not possible impacts should be mitigated and finally, if there is no alternative, compensation provided for any remaining impacts. Biodiversity net gain should be additional to any habitat creation required to mitigate or compensate for impacts. It is also important to note that net gains can be delivered even if there are no losses through development.

We advise the local plan should make provision for development of a specific Supplementary Planning

Document on net gain that will outline in detail Council expectations of developers and mechanisms for delivery, as well as ensuring net gain is delivered in a suitably strategic way. Natural England would be happy to engage with the Council on implementing net gain into local policy and to advise further on the development of such a SPD.

Please note that Biodiversity Metric 3.0 is due to be published in Spring 2021, which will supersede Biodiversity Metric 2.0. We advise that the policy is updated accordingly and that this metric is used to measure gains and losses to biodiversity resulting from development, and implement development plan policies on biodiversity net gain. Net gain specifically should derive strictly from habitat enhancement and creation, required as calculated using the metric, to be in line with para 174(b) of the NPPF which requires biodiversity net gains to be measurable.

### **Policy Theme 3 – Sustainable Design and Construction in the Built Environment**

Natural England asks the council to consider providing a supplementary planning document that details guidance on how the relevant policies in the Wiltshire local plan will be applied to planning applications.

The guide is an important (material) consideration in helping to make decisions about planning applications. The information and guidance will be of particular use to developers, agents and architects looking to promote development sites in Wiltshire. It should provide practical advice to help developers comply with the Wiltshire Plan's sustainable design and construction requirements.

This guide should be read alongside other planning documents, in particular the Wiltshire Core Strategy, the Local Transport Plan and the councils emerging strategy papers for both GBI and Climate.

### **Policy Theme 4 – Sustainable Energy Generation and Management**

Natural England support this policy theme. We support the requirement for new housing and commercial developments to include sustainable energy generation.

Natural England supports favoured policy for sustainable energy generation. This is consistent with the council's announcement of climate emergency. It should be made clear that green energy production although favoured does not override the ecological mitigation hierarchy and developments should not be counter intuitive to the recovery of nature. We recommend that the council identifies sites to put forward for sustainable energy generation and assess them under SA/SEA regulations and Habitats directives.

### **Policy Theme 5 – Sustainable Transport and Air Quality**

We would expect the plan to address the impacts of air quality on the natural environment. In particular, it should address the traffic impacts associated with new development, particularly where this impacts on European sites and SSSIs. The environmental assessment of the plan (SA and HRA) should also consider any detrimental impacts on the natural environment, and suggest appropriate avoidance or mitigation measures where applicable.

Natural England advises that one of the main issues which should be considered in the plan and the SA/HRA are proposals which are likely to generate additional nitrogen emissions as a result of increased traffic generation, which can be damaging to the natural environment.

The effects on local roads in the vicinity of any proposed development on nearby designated nature conservation sites (including increased traffic, construction of new roads, and upgrading of existing roads), and the impacts on vulnerable sites from air quality effects on the wider road network in the area (a greater distance away from the development) can be assessed using traffic projections and the 200m distance criterion followed by local Air Quality modelling where required. We consider that the designated sites at risk from *local impacts* are those within 200m of a road with increased traffic<sup>3</sup>, which feature habitats that are vulnerable to nitrogen deposition/acidification. [APIS](#) provides

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<sup>3</sup> The ecological effects of diffuse air pollution (2004) English Nature Research Report 580  
Design Manual for Roads and Bridges Volume 11, Section 3 Part 1 (2007), Highways Agency

a searchable database and information on pollutants and their impacts **on habitats and species**.

NPPF 181 states planning policies and decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and Clean Air Zones, and the cumulative impacts from individual sites in local areas. Opportunities to improve air quality or mitigate impacts should be identified, such as through traffic and travel management, and green infrastructure provision and enhancement. So far as possible these opportunities should be considered at the plan-making stage, to ensure a strategic approach and limit the need for issues to be reconsidered when determining individual applications. Planning decisions should ensure that any new development in Air Quality Management Areas and Clean Air Zones is consistent with the local air quality action plan.

### **Priority habitats, ecological networks and priority and/or legally protected species populations**

The Local Plan should be underpinned by up to date environmental evidence. This should include an assessment of existing and potential components of local ecological networks. This assessment should inform the Sustainability Appraisal, ensure that land of least environment value is chosen for development, and that the mitigation hierarchy is followed and inform opportunities for enhancement as well as development requirements for particular sites.

Priority habitats and species are those listed under Section 41 of the Natural Environment and Rural Communities Act, 2006 and UK Biodiversity Action Plan (UK BAP). Further information is available here: [Habitats and species of principal importance in England](#). Local Biodiversity Action Plans (LBAPs) identify the local action needed to deliver UK targets for habitats and species. They also identify targets for other habitats and species of local importance and can provide a useful blueprint for biodiversity enhancement in any particular area.

Protected species are those species protected under domestic or European law. Further information can be found here [Standing advice for protected species](#). Sites containing watercourses, old buildings, significant hedgerows and substantial trees are possible habitats for protected species.

Ecological networks are coherent systems of natural habitats organised across whole landscapes so as to maintain ecological functions. A key principle is to maintain connectivity - to enable free movement and dispersal of wildlife e.g. badger routes, river corridors for the migration of fish and staging posts for migratory birds. Local ecological networks will form a key part of the wider Nature Recovery Network proposed in the 25 Year Environment Plan. Where development is proposed, opportunities should be explored to contribute to the enhancement of ecological networks.

Planning positively for ecological networks will also contribute towards a strategic approach for the creation, protection, enhancement and management of green infrastructure, as identified in paragraph 171 of the NPPF.

Where a plan area contains irreplaceable habitats, such as ancient woodland, ancient and veteran trees, there should be appropriate policies to ensure their protection. Natural England and the Forestry Commission have produced [standing advice](#) on ancient woodland, ancient and veteran trees.

## **Comments on Principle Settlements and Market town site selection reports**

### **General comments on final proposed sites for assessment**

During the site appraisal stage and before selecting which sites to take forward as allocations in the plan, the following may be useful to ensure opportunities for biodiversity net gain are secured:

- Does the site present significant risks to biodiversity? If so, have alternative sites with lesser impacts been explored?
- What site specific recommendations can help delivery biodiversity net gain, for example what further survey work may be required at the planning application stage?
- Whether the site can accommodate on-site biodiversity net gain provision or whether there is a need for off-site contributions? What types of habitat creation or enhancement are most

appropriate?

- Does there need to be any restrictions on the type of development that will be acceptable or particular parts of the site that should not be developed?

During the site selection process, potential sites should be judged in accordance with all policies in the NPPF, including selecting land with the least environmental value, where consistent with other policies. The Biodiversity Metric can be useful during this process to understand the opportunities on a site, test indicative biodiversity net gains and to ensure sites of high biodiversity value are not selected.

Natural England encourages developers, promoting sites for inclusion in the plan to use its Discretionary Advice Service, to discuss opportunities for biodiversity net gains on individual sites. This helps to ensure evidence is provided and appropriate ways to deliver biodiversity net gain can be included in site allocations if they progress. This can also help speed up the planning application stage. Further details on Natural England's Discretionary Advice Service is provided here.

### **Protected Landscapes – general comments**

All development allocations, including those within settlements, should carefully consider impacts on the landscape and scenic beauty of the Protected Landscape (PL), including cumulative impacts and impacts on the settings of PL to ensure the highest status of protection is given to the PL, in line with NPPF para 172. We request that a Landscape and Visual Impact Assessment (LVIA) is carried out for allocations, particularly those outside of existing settlement boundaries, to assess the impacts on the character of the landscape and the visual impacts. Whilst such a LVIA would not be as detailed as one for a planning application, sufficient information e.g. on visual baseline, number of dwellings and key viewpoints are required to inform our advice. Allocations within the existing built up area may also benefit from a LVIA e.g. where extensive green spaces contribute to the character of the settlement, particularly when viewed from high points in an AONB and such views are recognised as one of the special qualities of the PL.

All development within PLs or their settings should:

- respect and enhance local landscape character;
- be of the highest design quality;
- include appropriate green infrastructure;
- incorporate appropriate enhancement measures e.g. landscape enhancement or access improvements, in line with the relevant NP/AONB Management Plan or local landscape character assessment. Biodiversity net gain should also be delivered (in line with a local plan policy/other local strategy).

### **Planning for Amesbury**

Site 2 (SHELAA reference 3186)

Natural England advises this site supports a mixed area of both Deciduous Woodland and Lowland Fen (HQ7) registered under the Priority Habitat Index, we would advise that this site demonstrates significant sensitivities and should not be taken forward for further detailed assessment to allocate housing. Please see above comment on Priority habitats and species.

Site 3 (SHELAA reference S1054 & S1010)

Natural England does not hold any site specific survey data but the land at this site is highlighted provisionally as Grade 3 in the Agricultural Land Classification (ALC). Natural England advise that proposals at this site should not be permitted in the absence of site specific soil surveys to determine whether soils qualify as Best and Most Versatile (3a). Please refer to comment on soils and ALC below.

### **Planning for Bradford on Avon**

Site 3 (SHELAA reference 739)

Natural England recognises that part of this site falls within flood risk zones 2 and 3. As a registered greenspace further consideration should be given to biodiversity value of this site and whether restoration/enhancement to priority habitats would be more appropriate. If this site should be successful in the next round of analysis then compensation should be considered for the degradation

or loss of a GI asset.

### **Planning for Calne**

Site 2 (SHELAA reference 495 & 3610)

Individually this site may not demonstrate harm however cumulative impacts with site 3 and 4 may have potential to significantly impact on the setting of North Wessex Downs AONB.

Site 3 (SHELAA reference 488, 489, 451 & 3168)

Individually this site may not demonstrate harm however cumulative impacts with site 2 and 4 may have potential to significantly impact on the setting of North Wessex Downs AONB.

Site 4 (SHELAA reference 3642, 487, 1104 ((a, b, and c))

These sites represent a large increase in the overall settlement boundary to Calne. This represents a major encroachment on the boundary of the North Wessex Downs AONB. Natural England concurs with the SHELAA conclusion that development at this site is unlikely to be mitigated and would pose significant harm to the characteristics of the AONB.

The gravel pits to the North of these combined sites provide evidence that land in this area is of particular value in terms of soils. Natural England holds specific survey data to demonstrate that soil at the gravel pit north are [Grade 1 and 2](#) on the ALC. Please use the provided link for respective soil report and maps.

This would suggest that neighbouring land is of similar quality and should be safeguarded according to NPPF 170/171 and 118. Please see detail provided below on soils

All of the site above should be assessed individually and cumulatively for impacts on the North Wessex Downs AONB.

### **Planning for Corsham**

All sites at Corsham have potential to impact on Bath and Bradford on Avon Bat SAC, sites 5 and 6 are also in close proximity to the Box Mine SSSI which is linked to the Bat SAC. Further detailed assessment is required for these sites so as to ensure that adverse impacts on habitat features that are used by bat species linked to the Bat SAC are avoided. Natural England notes the SAs conclusion that high level of growth are likely to have a significant adverse effect on biodiversity.

Site 5 (SHELAA reference 3034) This site extends beyond the built environment into priority habitat that is nestled between Corsham Railway Cutting SSSI and Box Mine SSSI a component SSSI of the International Bath and Bradford on Avon Bat SAC.

This site also encroaches on the Cotswolds AONB and in the absence of LVIA and based on the information provided Natural England does not support this site.

### **Planning for Chippenham**

Site 1 (SHELAA reference 506b) This site demonstrates increased value for soils, Natural England holds specific survey data to demonstrate that soils at this location are of Best and Most Versatile quality at [ALC Grade 3a](#). When assessing this site further consideration should be given to the sites value to contribute to Wiltshire councils Climate strategy through carbon sequestration in soils.

### **Planning for Devizes**

Site 1 (SHELAA reference 662) is directly adjacent to the North Wessex Downs AONB (consider advice above on development within the setting) and would encroach into an open landscape which although outside the AONB falls very much within this open downland landscape. To the North east a section of Pylons are part of a programme with National Grid to be undergrounded in the AONB, this will further enhance the open landscape.

This site would also restrict movement of mobile species in Lay Wood from the wider landscape to

the East.

Natural England in concurrence with the AONB and in the absence of LVIA does not support this site.

Site 2 (SHELAA reference 693a and 693b) As above this proposed site is directly adjacent to the AONB and having visited the site Natural England believe that this site poses the same restrictions as the site excluded from further assessment (SHELAA reference 549a). In the absence of LVIA Natural England therefore does not concur with the landscape assessment of 693a and 693b and does not support this site.

Site 3 (SHELAA reference 624) as above, this site is considered within the setting but it is believe through sensitive design impacts could be mitigated. Design would also have to take into account and where possible enhance the value of nearby allotment as a GI asset.

### **Planning for Malmesbury**

Sites 4 and 5 (respective SHELAA references 691 and 502) both of these sites are in the setting of the Cotswolds AONB. Please see general commentary on proposed site allocations within the setting of nationally protected landscapes.

In the absence of LVIA Natural England does not concur with the SHELAA assessment for landscape.

### **Planning for Marlborough**

It is unclear whether development in Marlborough will have an effect on water abstraction in the Kennet and Lambourn catchment, further consideration is required when considering allocation sites in this area and whether Water Quantity and the impacts on the Kennet and Lambourn SAC.

Site 1 (SHELAA reference 660 and 661) this site is within close proximity to the River Kennet SSSI and proposals should demonstrate how impacts will be avoided, if avoidance cannot be achieved mitigation should be sought. Applications should be accompanied with a flood risk assessment (FRA) highlighting how Greenfield run off rates will be maintained to ensure no impact on the River Kennet SSSI.

Development submissions at this site should be accompanied with Landscape Visual Impact Assessment (LVIA) to assess the impacts on the AONB.

The current visualisation (plan) within the NDP appears to neglect the value of the SSSI designation and does not demonstrate the particular requirement to avoid impacts. Natural England advise all impacts should be assessed before a masterplan is developed and agreed in consultation with Wiltshire Council and Natural England.

Site 2 (SHELAA reference MA2). The Eastern boundary of this site is dominantly priority habitat (see above advice on priority habitats and species).

The area around Savernake SSSI and specifically the disused railway tunnel has demonstrated that the Savernake SSSI is a nationally important Bat hibernation site and is of national importance for an internally protected bat species such as Natterers. Site 2 would constrain opportunities for improving landscape scale connectivity for the important bat populations as well as other key species (e.g. Duke of Burgundy and dormice etc). Natural England do not therefore support this site as an allocation in Marlborough.

### **Planning for Royal Wootton Bassett**

Site 7 (SHELAA reference incomprehensible possible 498) Contains [Wootton Bassett Mud Springs](#) SSSI designated for its fluvial geomorphology. Further consideration/assessment for this designation is required before allocating in the local plan.

### **Planning for Salisbury**

#### **General comment on development in Salisbury**

The council needs to consider whether development at the proposed allocation sites fits within the strategic solution for the River Avon SAC catchment. For those sites that do not fit within the councils criteria for consideration in the strategic AA proposals will be required to demonstrate nutrient neutrality.

All sites considered in the final pool for assessment have potential to impact on the River Avon International Site.

Sites 6, 7 and 8 will also need to consider recreational impacts on the New Forest International site.

Sites 6 (SHELAA S159 ) is directly adjacent to [East Harnham Meadows SSSI](#), development at this site and potential impacts from recreational and air quality on the grassland communities should be considered prior to allocation.

Natural England holds [site specific reports and maps](#) highlighting the value the site contributes to the councils objective to become carbon neutral by 2030. This site is valued as Grade 2 Best and Most versatile soils in the Agricultural Land Classification. Please see general comments on the value of soils below.

Natural England has been made aware that this site demonstrates significant issue with surface and ground water, based on this evidence we do not concur with the Stage 2 assessment for flood risk.

Natural England does not concur with the SA scoring for biodiversity, we believe that the sites proximity international and nationally designated sites, it's sensitivities to water run-off and ground water change do not represent a minor adverse effect. Natural England would consider this is likely to be major and the scoring should be reassessed.

Based on the information available Natural England does not support progressing this site as a preferred option site.

Site 7 (SHELAA 3423, 3461)

Alone this site may not represent a concern, however when combined with site 6 there may be an increase in local recreation pressure on the nearby accessible [Britford Water Meadows SSSI](#). Development of this site would also lead to the ecological isolation of a nearby local wildlife site. Any allocation would need to ensure these potential impacts are avoided through design and support for the management of recreational activity on the SSSI.

Site 8 (SHELAA reference 3421) similarly to site 7 mentioned above the inclusion of this site isolates a local wildlife site. Cumulative impacts are factored in to the SA scoring and should be amended and adjusted accordingly.

### **Planning for Tidworth and Ludgershall**

Site 1 (SHELAA reference 3498) Is within the setting of the North Wessex Downs AONB. Please see general comments on landscape and development within the setting of nationally designated landscapes. A site visit around this site has led to the determination that LVIA is required to determine the impacts development would have on the AONB however Natural England considers that part of this site could deliver housing, whilst part could form a valuable buffer to the AONB

Sites 4 and 5 are considered major allocations and stage 4 assessment should be accompanied with LVIA.

Site 5 (SHELAA references 2064, 2065, 2066) contain a significant area of deciduous woodland (namely the Newdrove Plantation) proposal at this site should aim to retain priority habitat and aim to enhance the ecosystems services provided. Natural England advise that this cluster of sites should be accompanied with an overarching masterplan that integrates multi-functional green infrastructure.

### **Planning for Trowbridge**

Natural England notes the final pool of assessment sites. It is noted that sites 4, 5 and 6 demonstrate

potential issues for bat species. Both preferred sites (4 and 5) are within a medium risk area known as the Hilperton Gap and would constrain opportunities for landscape scale ecological connectivity with the Kennet and Avon Canal.

Further assessment of all three site individually and cumulatively on important bat populations is required before Natural England can make a determination on the suitability of these proposed allocation sites for the area of Trowbridge.

### **Planning for Warminster**

Site 9 (SHELAA reference 3676) encroach in the rural landscape and appears to impact on ecological connectivity in the locality. Further assessment required to determine impacts on mobile species and overall biodiversity impact.

All proposed allocation fall within the zone of influence for the Salisbury Plain SPA strategic solution.

### **Planning for Westbury**

Site 6 (SHELAA reference 1011) The Proposals for a bypass to the east of Westbury were rejected by inspector on the grounds of unacceptable landscape impact. As such, on the face of it, this proposal would seem to be at least as damaging, to meet a need that could be accommodated elsewhere.

We welcome that this has been noted in the Site selection report, and advise that a LVIA is undertaken to assess the impact in detail.

Site 10 (SHELAA reference) As stated this site has a good network or PRow and proposals would need to demonstrate no net detriment to the local GI asset.

### **Further advice**

#### **Green Roofs**

Natural England is supportive of the inclusion of living roofs in all appropriate development. Research indicates that the benefits of green roofs include reducing run-off and thereby the risk of surface water flooding; reducing the requirement for heating and air-conditioning; and providing habitat for wildlife.

We would advise your council that some living roofs, such as sedum matting, can have limited biodiversity value in terms of the range of species that grow on them and habitats they provide. Natural England would encourage you to consider the use of bespoke solutions based on the needs of the wildlife specific to the site and adjacent area. I would refer you to <http://livingroofs.org/> for a range of innovative solutions.

### **Access and Rights of Way**

Natural England advises that the Plan should include policies to ensure protection and enhancement of public rights of way and National Trails, as outlined in paragraph 98 of the NPPF. Recognition should be given to the value of rights of way and access to the natural environment in relation to health and wellbeing and links to the wider green infrastructure network. The plan should seek to link existing rights of way where possible, and provides for new access opportunities. The plan should avoid building on open space of public value as outlined in paragraph 97 of the NPPF.

The plan should make provision for appropriate quantity and quality of green space to meet identified local needs as outlined in paragraph 96 of the NPPF. Natural England's work on [Accessible Natural Greenspace Standard \(ANGSt\)](#) may be of use in assessing current level of accessible natural greenspace and planning improved provision.

### **Soils**

#### **Soil and Agricultural Land Quality**

The Local Plan should give appropriate weight to the roles performed by the area's soils. These should be valued as a finite multi-functional resource which underpin our wellbeing and prosperity. Decisions about development should take full account of the impact on soils, their intrinsic character and the sustainability of the many ecosystem services they deliver, for example:

1. Soil is a finite resource that fulfils many important functions and services (ecosystem services) for society; for instance as a growing medium for food, timber and other crops, as a store for carbon and water, as a reservoir of biodiversity and as a buffer against pollution. It is therefore important that the soil resources are protected and used sustainably. The [Natural Environment White Paper](#) (NEWP) '[The Natural Choice: securing the value of nature](#)' (Defra, June 2011), emphasises the importance of natural resource protection, including the conservation and sustainable management of soils, for example:
  - A Vision for Nature: 'We must protect the essentials of life: our air, biodiversity, soils and water, so that they can continue to provide us with the services on which we rely' (paragraph 2.5).
  - Safeguarding our Soils: 'Soil is essential for achieving a range of important ecosystem services and functions, including food production, carbon storage and climate regulation, water filtration, flood management and support for biodiversity and wildlife' (paragraph 2.60).
  - 'Protect 'best and most versatile' agricultural land' (paragraph 2.35).
2. The conservation and sustainable management of soils also is reflected in the [National Planning Policy Framework](#) (NPPF), particularly in paragraphs 170 and 171. When planning authorities are considering land use change, the permanency of the impact on soils is an important consideration. Particular care over planned changes to the most potentially productive soil is needed, for the ecosystem services it supports including its role in agriculture and food production. Plan policies should therefore take account of the impact on land and soil resources and the wide range of vital functions (ecosystem services) they provide in line with paragraph 118 of the NPPF, for example to:
  - Safeguard the long term capability of best and most versatile agricultural land (Grades 1, 2 and 3a in the Agricultural Land Classification) as a resource for the future.
  - To avoid development that would disturb or damage other soils of high environmental value (e.g. wetland and other specific soils contributing to ecological connectivity, carbon stores such as peatlands etc) (*See comments below on biodiversity and geodiversity*), and, where development is proposed.
  - Ensure soil resources are conserved and managed in a sustainable way.
3. To assist in understanding agricultural land quality within the plan area and to safeguard 'best and most versatile' agricultural land in line with paragraphs 170 and 171 of the National Planning Policy Framework, strategic scale Agricultural Land Classification (ALC) Maps are available. Natural England also has an archive of more detailed ALC surveys for selected locations. Both these types of data can be supplied digitally free of charge by contacting Natural England. Some of this data is also available on the [www.magic.gov.uk](http://www.magic.gov.uk) website. The planning authority should ensure that sufficient site specific ALC survey data is available to inform decision making. For example, where no reliable information was available, it would be reasonable to expect that developers should commission a new ALC survey, for any sites they wished to put forward for consideration in the Local Plan
4. General mapped information on soil types is available as 'Soilscapes' on the [www.magic.gov.uk](http://www.magic.gov.uk) and also from the LandIS website <http://www.landis.org.uk/index.cfm> which contains more information about obtaining soil data.
5. Further guidance for protecting soils (irrespective of their ALC grading) both during and following development is available in Defra's [Construction Code of Practice for the Sustainable Use of Soils on Construction Sites](#), to assist the construction sector in the better protection of the soil resources with which they work, and in doing so minimise the risk of environmental harm such as excessive run-off and flooding. The aim is to achieve positive outcomes such as cost savings, successful landscaping and enhanced amenity whilst maintaining a healthy natural environment, and we would advise that the Code be referred to where relevant in the development plan.

**Tranquillity**

The Local Plan should identify relevant areas of tranquillity and provide appropriate policy protection to such areas as identified in paragraph 100 and 180 of the NPPF.

Tranquillity is an important landscape attribute in certain areas e.g. within National Parks/AONBs, particularly where this is identified as a special quality. The CPRE have mapped areas of tranquillity which are available [here](#) and are a helpful source of evidence for the Local Plan and SEA/SA.

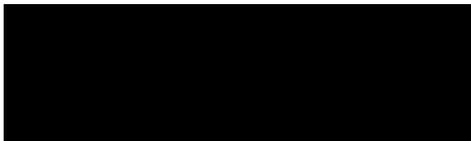
**Gypsy and Traveller Local Plan**

Natural England have no comments to make on this consultation at this stage. Once sites have been selected please re-consult Natural England.

For any new consultations, or to provide further information on this consultation please send your correspondences to [consultations@naturalengland.org.uk](mailto:consultations@naturalengland.org.uk)

If you have any queries relating to the advice in this letter please contact me directly.

Yours sincerely



## Annex A – Climate Change Adaptation

We have put together the following list of resources that can help to embed climate change adaptation into the Local Plan:

The [Sixth Carbon Budget](#) is a report based on a programme of analysis by the Climate Change Committee (CCC) that builds on evidence published in 2020 for Net Zero advice. To support the advice CCC have produced;

- A [Methodology Report](#), setting out the evidence and methodology behind the scenarios.
- A [Policy Report](#), setting out the changes to policy that could drive the changes necessary particularly over the 2020s.
- a [separate dataset](#) for the Sixth Carbon Budget scenarios, setting out detail and data on the pathways that can be included.

<https://www.theccc.org.uk/publication/sixth-carbon-budget/>

- The [Climate Change Adaptation Manual](#) provides extensive information on climate change adaptation for the natural environment. It includes the Landscape Scale Climate Change Assessment Method that can help people through an assessment of the impacts and vulnerabilities of their natural environment features and the adaptation they can plan. There are sections on habitats, species, green infrastructure, access and recreation and geology and geomorphology.
- The [Nature Networks Evidence Handbook](#) – again, a repository for our current evidence, tools and action regarding nature networks, it contains practical suggestions for designing and delivering a network and there is a practitioners version.
- A range of spatial data including - [National Biodiversity Climate Change Vulnerability Assessment](#) (NBCCVA), National Habitat Network, [Species Risks and Opportunities](#) climate envelope modelling, etc. These datasets are included in the Landscape Scale Climate Change Assessment Method in the Climate Change Adaptation Manual, the Data and Tools chapter in the Nature Networks Evidence Handbook and NRN toolkit list. Furthermore, the fragmentation metric of the NBCCVA tool provides the Biodiversity and Connectivity Tool within the Biodiversity Metric of Net Gain.
- A range of introductory climate change webinars ([Natural England Climate Change webinars](#)) are available on our YouTube channel. The following are planning and climate change documents which looked at climate change, species responses, ecological networks and spatial planning:
  - Climate Change and Biodiversity Adaptation: The Role of the Spatial Planning System (NECR004) <http://publications.naturalengland.org.uk/publication/41006?category=10003>
  - Making space for wildlife in a changing climate (NE263) <http://publications.naturalengland.org.uk/publication/47002?category=10003>
  - Spatial planning for biodiversity in our changing climate (ENRR677) <http://publications.naturalengland.org.uk/publication/63010?category=10003>

**STRAT370**



## **A case for the inclusion of equestrians to all public trails**

The British Horse Society (BHS) and other local equestrian access groups have a vision of a well-planned, joined up rights of way network that would be available and useable by all vulnerable non-motorised users\*, namely walkers, cyclists and equestrians\*\*. As the road network becomes increasingly busier and subsequently more dangerous, there is greater need for Authorities to do everything they can to adopt this vision and help bring it to reality.

To promote safety, healthy lifestyles, active travel and tourism the we do not expect any Authority to deliver on an immediate, comprehensive network but do ask Authorities to work towards that goal and make provision for all vulnerable non-motorised users through any opportunities that arise including new developments, new public rights of way proposals and changes to the existing network including upgrading existing footpaths to Restricted Byway or Bridleway status.

Many Authorities use inclusive terminology such as 'Multi-User Path' or 'Greenway' and whilst these have no legal definition, we would see these as: -

- A public Right of Way which permits all vulnerable non-motorised users, namely walkers, cyclists and equestrians.

The BHS and other local equestrian access groups requests that Local Authority departments (Planning, Highways, Rights of Way etc.) ensure that where provision for vulnerable non-motorised users is being considered, equestrians are wholly included unless there is a compelling reason not to do so.

\* the exception to non-motorised users would be electric mobility vehicles.

\*\* equestrians refers to horse riders and where practicable, carriage drivers.

**STRAT372**

## **Response to Wiltshire Local Plan Review consultation, January 2021**

Dear Spatial Planning,

Thank you for the opportunity to comment on the preliminary stages of the Wiltshire Local Plan review.

As you are aware, we consulted on strategic cross-boundary matters to develop our Duty to Cooperate Statement in 2020. The statement is published [here](#) and will be updated as the plan is progressed to the Publication stage (Reg 19).

The DtC Statement (Table 6.2) identifies the following issues as being of strategic importance between our authorities:

- Housing Needs and Distribution;
- Gypsy and traveller provisions and Transit sites;
- Protected Landscapes; and
- Transport Network.

Comments are also made in this response in relation to Natural Environment and Climate Change.

Each of these areas are addressed in turn below.

### **Housing Needs and Distribution**

The Emerging Spatial Strategy document, January 2021 notes that Wiltshire needs to accommodate between 40,840 and 45,630 new homes over the Plan period 2016-2036. There is no indication that this growth cannot be accommodated within the administrative boundary of Wiltshire itself and South Somerset have not received a request to accommodate any unmet need from Wiltshire Council, this is supported.

The emerging spatial strategy for Wiltshire is based around four different Housing Market Areas. The Trowbridge HMA adjoins South Somerset and it noted that 11,000 new homes are proposed in this HMA. The emerging strategy strikes a balance between the alternatives tested and result in a lower level of growth at Trowbridge compared to past expectations, but enough to reflect its status as a Principal settlement; and a significantly higher scale of growth at Westbury but not so high as to risk it being unmanageable. The scale of growth at Warminster broadly corresponds with existing planned rates and Bradford on Avon sees lower growth which reflects the fact that it is heavily constrained. It is considered that this approach will not adversely impact on the housing delivery and the role and function of settlements in South Somerset.

### **Gypsy and traveller provisions and Transit sites**

A separate response to the Gypsy and Traveller scoping report has been submitted.

### **Protected Landscapes**

The Cranborne Chase and West Wiltshire Downs adjoins South Somerset no specific issues arise from the consultation document in relation to the AONB.

## **Climate Change**

The steps being taken by Wiltshire Council to address Climate Change and Net Biodiversity are welcomed. South Somerset District Council is seeking to be carbon neutral across its own operations by 2030 at the latest and ideally by 2023. It will also be working to achieve a significant reduction in emissions and improve carbon offset rates across the geography of South Somerset via direct action, supporting our communities in their ambitions and ensuring that working towards carbon neutrality is a thread that runs through all our decision-making. More information can be found in our Environment Strategy [here](#).

## **Natural Environment**

We would like to take this opportunity to draw to your attention the fact that in August the Council received a letter from Natural England stating that phosphates levels within the Somerset Levels catchment had rendered the protected sites on the Levels and Moors to be in an unsatisfactory condition. As a result, Natural England indicated that the scope for the local planning authority to grant planning permission for further developments.

The developments caught by this situation are:

- New residential units – including tourist accommodation, gypsy sites /pitches
- Agricultural Development – additional barns, slurry stores etc. where it is likely to lead to an increase in herd size
- Prior Notifications of agricultural development where, as a result of the development, the herd size may increase. Also, prior notifications for change of use of office to dwellings and agricultural buildings to dwellings
- Anaerobic Digesters
- Possibly some tourism attractions

We have a map that identifies a catchment area of affected land which extends just into Wiltshire. You can find more information and a link to the map [here](#). It is important to note that the map is only indicative at this stage, and that the Somerset Nutrient Strategy will address a more definitive catchment map to ensure greater certainty for developers/applicants.

## **Transport Network**

The A303 forms part of the Strategic Road Network that passes through Wiltshire and South Somerset and forms the South Somerset Functional Market Area connecting it with the wider south west and south east. The Development Consent Orders (DCO) relating to the improvements at Stonehenge and between Sparkford and Ilchester have now been approved.

The DCO for the A358 Taunton to Southfields improvements has not yet been submitted and is still at the pre-application stage; it is not yet known when the final DCO will be submitted. South Somerset District Council strongly supports the need for this single carriageway section of the A303 to be upgraded to dual carriageway as part of an end-end whole route improvement of the A303/A358 between the M3 and the M5 at Taunton. If designed appropriately, it will improve connectivity and access to the South West Region, improve the resilience of the strategic road network and help to promote economic growth in the region.

## **Other Matters**

Finally, you may also be aware that two unitary proposals have been submitted to the Secretary of State for Housing, Communities and Local Government, for his consideration. This includes the One Somerset proposal submitted by Somerset County Council, and the Stronger Somerset proposal submitted by the four district councils on 9<sup>th</sup> December. The government has been clear that it could decide to make no change, or it may select one of the two proposals for change being put forward. The case for the district's proposal can be found [here](#).

We look forward to continuing to work with you on cross-boundary strategic planning matters and preparing a statement of common ground as our respective Local Plan reviews progress.

Kind regards,



**STRAT373**

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# Representation Statement

Wiltshire Local Plan Review (Regulation 18) Consultation Response: March 2021

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**Landowners:** [REDACTED]

**Date:** March 2021

**Site:** Land at Petticoat Lane

**Wiltshire SHELAA Ref:** 3665



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## **Contents**

### **Sections**

- 1.0 Introduction
- 2.0 Relevant Background Information
- 3.0 Suitability of the Land at Petticoat Lane for a Residential Allocation
- 4.0 Response to the Consultation
- 5.0 Conclusions

### **Appendices**

- A Site Location Plan: MEG Architects
- B Parameter Plan: MEG Architects
- C Transport Technical Note: Miles White Transport

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## 1.0 Introduction

- 1.1 PlanningSphere have been instructed to make representations to the Wiltshire Local Plan Review (Regulation 18) on behalf of the owners of the subject site, [REDACTED]. The subject site lies to the south west of Petticoat Lane, Dilton Marsh and is on the Site Location Plan shown at Appendix A.
- 1.2 The technical delivery of the site has been established through preliminary technical assessments in respect of access, and other high-level assessments following the identification of the site constraints.
- 1.3 This representation contends that in order to meet the required plan making test of 'soundness' and maintain mixed-tenure housing delivery in the Trowbridge Housing Market Area over the plan period to 2036, it will be necessary for the Council to consider the allocation of the subject site in the Local Plan Review.
- 1.4 We would welcome an opportunity to discuss the evolution of more detailed technical evidence and the promotion of the site through success stages of the Local Plan Review plan making process with representatives of the Council's Spatial Planning Team in due course.

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## 2.0 Relevant Background Information

### (i) Site Description and Context

- 2.1 The subject site extends to 0.98ha and is located within the village of Dilton Marsh albeit outside the defined village settlement boundary. The site is bounded by existing residential dwellings to the east and north, and western boundary adjoins the Dilton Marsh Social Club. Open countryside lies to the south. The site boundary is shown in the Site Location Plan at Appendix A.
- 2.2 The site lies within a relatively central location of a large village, which benefits regular bus and several daily train services (Dilton Marsh Train Halt). The village offers a good range of services and facilities, including a post office, shop and primary school. Further services and facilities (including a secondary school) can be found in the nearby market town of Westbury. The town boundary falls within 300m of the Village. In addition to the employment opportunities offered by the town and the large trading estates on its perimeter, Westbury mainline railway station provides commuting opportunities with regular direct services to Bath, Bristol and London. Despite its village location, the subject site therefore benefits from good levels of non-car accessibility.
- 2.3 The site is relatively flat and is reasonably well contained from longer range views by residential properties, the Social Club and a mature tree belt on its southern boundary.
- 2.4 No listed buildings lie proximate to the site.
- 2.5 The site lies within Flood Risk Zone 1 on the EA's Flood Map for Planning.

### (ii) Existing Lawful Use and Planning history

- 2.6 The site is currently in residential use as a single dwelling. There is no relevant planning history on the Council's

### (iii) Existing planning policy context

- 2.7 The Development Plan for the site comprises:
- Wiltshire Core Strategy (adopted January 2015);
  - Wiltshire Housing Site Allocation Plan (adopted February 2020).
- 2.8 The subject site lies within the 'Large Village' of Dilton Marsh. The site sits within and just beyond the defined settlement limits of the village.
- 2.9 Following designation of a neighbourhood planning area in 2018, and establishment of a Steering Group, there has been no further progress.
- 2.10 An extract from the Wiltshire Core Strategy proposals map is shown in Figure 1 below:

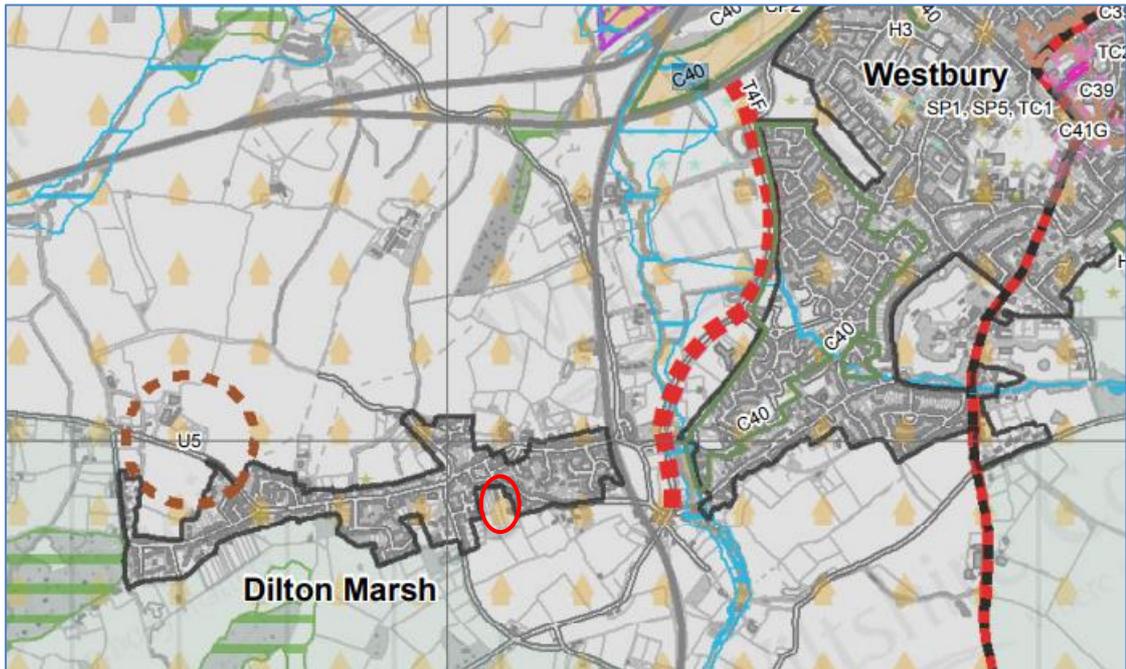


Fig 1. Extract from the Warminster Wiltshire Core Strategy proposals map. The subject site is lies within the red circle. The site is not subject to any landscape or other restricted designations.

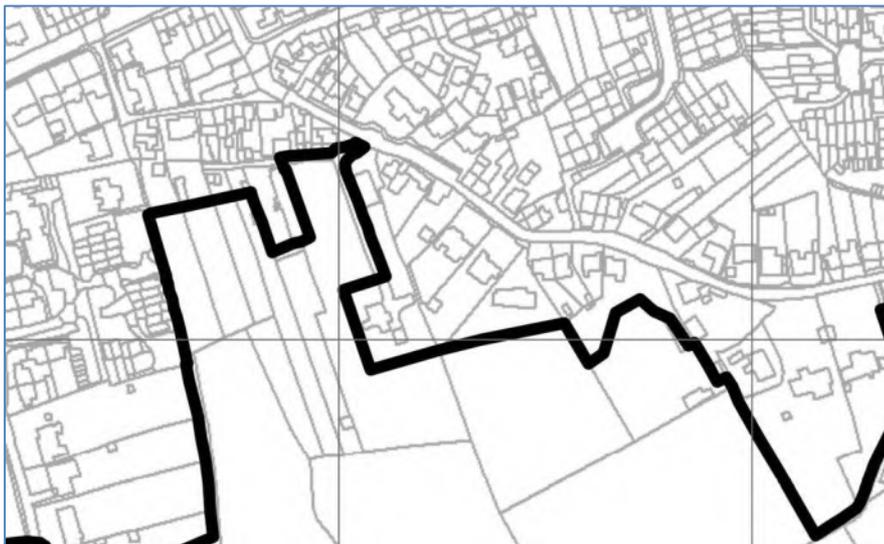


Fig 2. Extract from the existing settlement boundary from the Local Plan proposal map –NB.the subject site lies partially within the existing settlement boundary.

#### **(iv) Promotion history**

- 2.11 The site has not been previously promoted but a SHELAA reference was set up in September 2019 (Ref: 3665).

### 3.0 Suitability of the Site for Mixed-Use Tenure Housing Allocation

#### (i) Legal ownership and delivery.

3.1 The freehold interest of the subject site is owned by four parties: [REDACTED]. In the event that an allocation is secured, the landowner will seek to partner with a local SME developer to deliver the site. It is anticipated that the site could be delivered early in the plan period.

#### (ii) Development Parameters

3.2 The Parameter Plan at Appendix B and extracted in Figure 3 below identifies the potential developable area of the subject site. On this basis we consider that the site has potential to accommodate up to c.25 dwellings and public open space following the demolition of the existing dwelling.



Fig 3. Extract from the Proposed Parameter Plan

3.3 Key points to note in respect of the proposed parameter are summarised below:

- **Access:** vehicular access can be formed from Petticoat Lane as described in the accompanying Transport Technical Note at Appendix C.

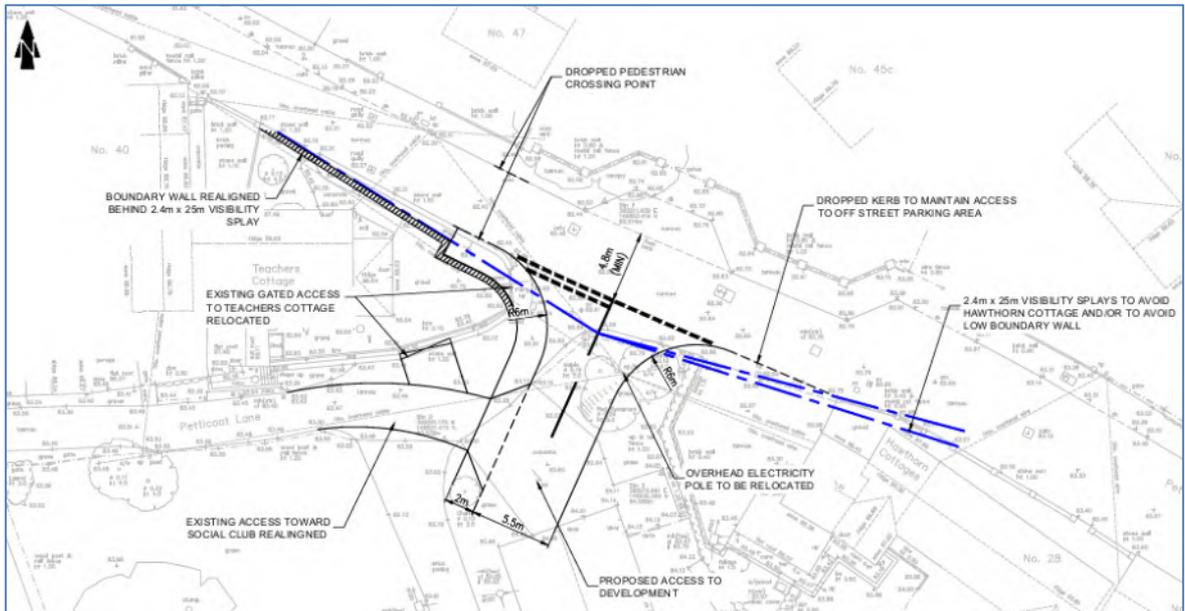


Fig 4. Extract from the Transport Technical showing the geometrical layout of the proposed access to the site.

- **Landscape / Ecology:** the site is not prominent in the wider landscape. A perimeter landscape buffer will be proposed to provide screening and wildlife corridors. It is considered that it will be possible to deliver mandatory 10% biodiversity net gain on site in accordance with the provisions of the Environment Bill, when enacted.
- **Drainage Strategy:** foul drainage will connect to existing mains surveys. A scheme of surface water attenuation will be design into a combined green and blue infrastructure proposal for the site.

3.4 Noting that the subject site has not been assessed as part of the Site Selection Report for Westbury, as this was only undertaken in principal settlements and market towns, we have undertaken our own preliminary assessment using the same traffic light assessment, as summarised in the table below:

WC Traffic Light Assessment	PlanningSphere Assessment
Accessibility	The site is situated in a highly accessible location with good non-car access to a wide range of village services and amenities, and public transport accessibility to nearby towns and beyond (Bath, Bristol and London)
Flood Risk	The site is located in Flood Zone 1 on the Environment Agency's Flood Map for Planning. The site is proposed for low density development with sufficient space for onsite surface water attenuation.

Heritage	The site does not have a sensitive historic context and low archaeological potential.
Landscape	The site is not subject to any AONB or local landscape designations. The site is primarily bounded by built development and a mature tree boundary to the south. Where there is a more open boundary on the west of the site, the existing narrow strip open field/landscape is bounded by built development of the village. There is scope for significant new screening where required to mitigate the impact of new built development.
Traffic	The Transport Technical Note at Appendix C confirms that it will be possible to form a point of vehicular access from Petticoat Lane.

**(iii) Further work**

3.5 In the event the site is considered by Wiltshire Council for allocation, the landowner would undertake the following work to evolve a technical evidence base:

- Infiltration testing and drainage design
- Detailed access design and traffic surveys
- In-season ecology surveys
- Landscape appraisal

3.6 Proposals will then be formulated and tested through a pre-application enquiry, which would feedback into the evidence base for the site.

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## 4.0 Response to the Consultation

### (i) National Policy Context

- 4.1 Paragraph 16 of the NPPF requires that plans should be ‘...(a) prepared with the objective of **contributing towards sustainable development**’; and ‘...(b) be prepared positively, in a way that is **aspirational but deliverable**’.
- 4.2 In respect of non-strategic policies, Paragraph 28 of the NPPF states that LPAs should consider allocations to promote sustainable development, and Paragraph 29 states that ‘...policies should be underpinned by relevant and up to date evidence’ and ‘...take into account relevant market signals’.
- 4.3 Paragraph 59 requires that as part of the Government’s objective of significantly boosting the supply of new homes, ‘...it is important at sufficient amount and **variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed...**’
- 4.4 Paragraph 61 states that the ‘...size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies... ..’
- 4.5 Paragraph 68 states that ‘...**small and medium sized sites can make an important contribution** to meeting the housing requirement of an area and are often **built out relatively quickly**’.
- 4.6 Paragraph 72 states that ‘...The supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or **significant extensions to existing villages** and towns, **provided they are well located and designed, and supported by the necessary infrastructure and facilities....**

*b) ensure that their size and location will support a sustainable community, with **sufficient access to services and employment opportunities** within the development itself (**without expecting an unrealistic level of self-containment**), or in larger towns to which there is good access;...*

(Our emphasis in **bold**)

### (ii) Spatial Strategy and distribution of growth in the Trowbridge HMA

- 4.7 Dilton Marsh is a Large Village that falls within the proposed Trowbridge Market Housing Market Area, which replaces the former North and West Housing Market Area. The change from three to four HMAs is broadly supported. However, for the reasons explained below we do not consider that the spatial strategy for delivering the growth is sound on the basis of deliverability or through acknowledgement of societal change that has been accelerated by the covid pandemic.
- 4.8 The Regulation 18 spatial strategy for the HMA is reliant to high degree on the delivery of the strategic growth options at Hilperton/Staverton as part of the growth strategy for the principal settlement of Trowbridge. At the other end of the settlement hierarchy, it is

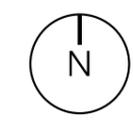
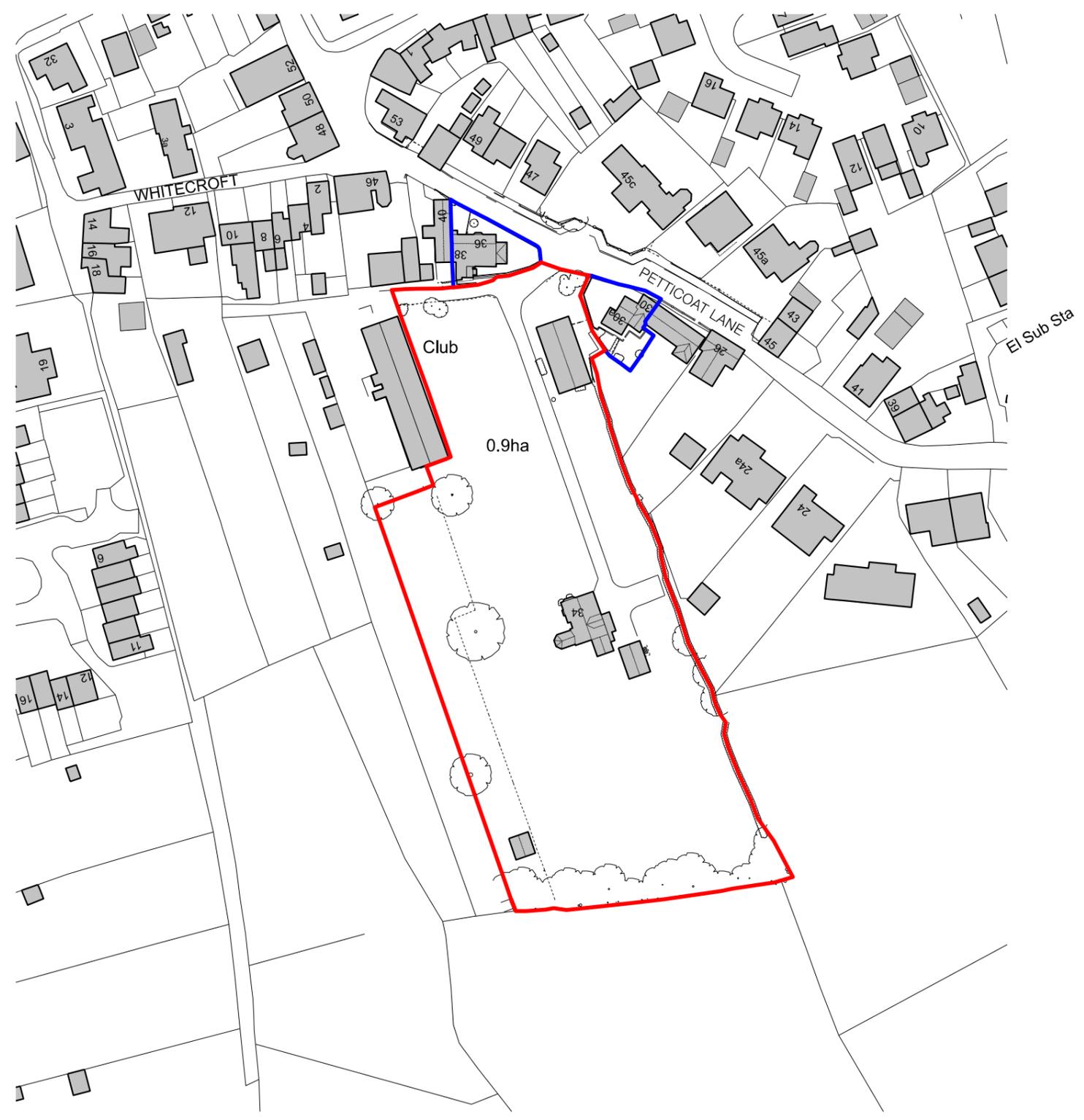
noted that the Regulation 18 Spatial Strategy is relying upon Neighbourhood Plans to deliver housing growth at Large Villages and other rural settlements in the rural hinterland outside principal settlements and market towns across the whole county.

- 4.9 Wiltshire Council has a poor track record in timely delivery of large urban extension strategic sites, such as Ashton Park in Trowbridge and the West Warminster Urban Extension. At the other end of the scale, Neighbourhood Plans have failed to make any real meaningful contribution to housing delivery in Wiltshire with many of the made Neighbourhood Plans not proposing any housing growth and acting a further constraint on development. No tangible progress has been made with the Dilton Marsh Neighbourhood Plan following its initial designation in 2018.
- 4.10 Given that the covid-pandemic has accelerated the trend towards flexible home-working and internet shopping, and that there is now a clear road map to the decarbonisation of private transport (electric vehicles), with transformation expected to take place over the plan period to 2036, we submit that the proposed Regulation 18 spatial growth strategy is too weighted to towards the principal settlements. We consider that more growth should be directed towards market towns and sustainable large villages, such as Dilton Marsh. This approach would place less reliance upon volume home builders to deliver of a small number of complicated strategic sites (for which there is poor delivery track record in Wiltshire) and would enable a greater role for SME regional housebuilders to deliver the housing requirement through a larger number of smaller scale housing developments in market towns and rural areas.
- 4.11 In the context of Wiltshire Council not currently being able to demonstrate a 5-year housing land supply across its whole administrative area (4.56 years in the last published Annual Monitoring Report with a base date of April 2019), combined with the NPPF requirements, as summarised above, and the importance of the SME sector in delivering smaller and medium sized sites to diversify choice of new housing provision, it is in our view imperative that the Council allocates sufficient smaller/medium sized sites at the Market Town and Large Village level in the identified settlement strategy. This is particularly important in the Trowbridge HMA where the deliverability of large-scale strategic sites is both technically and politically challenging.
- 4.12 It is also the case that large villages, such as Dilton Marsh act for as a service hub for a much wider hinterland of smaller rural settlements with no facilities. The NPPF acknowledges the need to for allocations to support existing rural facilities. Reliance on a more parochial neighbourhood plan making process to meet important rural needs is not sensible and could result in rural decline without proactive intervention at the County level.
- 4.13 Therefore, for the reasons outlined above, and to ensure the delivery of new open market and affordable homes in Trowbridge HMA, it will be imperative that additional housing allocations are made in the Local Plan Review at Market Towns and Large Villages to ensure continuity of supply over the plan period to 2036. Failure to include any new housing allocations at Dilton Marsh would render the plan unsound and would be in conflict with the NPPF.

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## 5.0 Conclusions

- 5.1 In strategic planning terms, we are concerned that the growth distribution strategy set out in the Regulation 18 consultation draft is too weighted towards large scale complex sites adjacent to principal settlements. Having regard to societal and technological changes that have been accelerated by the covid-pandemic, we advocate a more decentralised strategy to meet the growth requirement with more development distributed to market towns and rural areas. Such an approach would enable the SME housing building sector to play a greater role in the delivery of the housing requirement, which would ensure a more diverse and even supply of new housing over plan period. SME developers also tend to deliver housing at a higher build and design quality than volume home builders, as has been shown in consumer satisfaction surveys.
- 5.2 In summary, the allocation of the subject site would deliver the following benefits:
- A site suitable for delivery of circa 25 homes by an SME home builder and viable to deliver a 30% element of affordable housing provision.
  - A safe and suitable vehicular access solution from Petticoat Lane.
  - The ability to mitigate the impact of development on wider landscape through new planting.
  - The ability to address ecological constraints and deliver a biodiversity net gain on site.
  - Development on land located in Flood Zone 1 and the ability to attenuate surface water on site.
  - Provision of publicly accessible open space.
- 5.3 Given we have demonstrated that the subject site is suitable and technically deliverable, we request the Council revises its spatial strategy, and acts proactively to plan for housing need at Large Villages and **allocates site 3665 for approximately 25 No. dwellings and associated public open space.**



- OWNERSHIP BOUNDARY
- APPLICATION SITE BOUNDARY  
AREA: 0.9ha

# MITCHELL ELEY GOULD

PETTICOAT LANE  
DILTON MARSH  
LOCATION PLAN

SURVEY FEB 2021 1:1250@A3 SG OH  
2038 AP(0)00 -

## LAND AT PETTICOAT LANE, DILTON MARSH

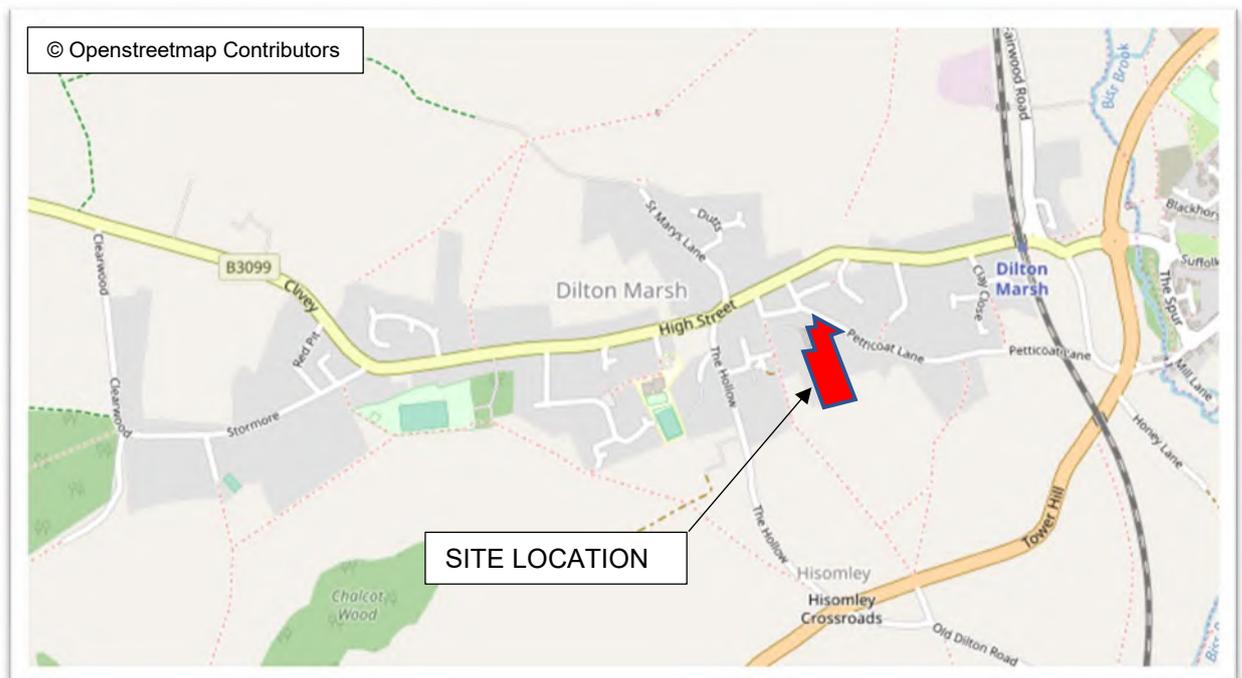
### ACCESS FEASIBILITY STUDY

#### **1 Introduction**

- 1.1 Land at No.34 Petticoat Lane, Dilton Marsh is being promoted for residential development through the Dilton Marsh Neighbourhood Plan process.
- 1.2 Vehicular and pedestrian access to the developed site will be a key planning consideration with this report providing a review of the existing highway infrastructure in the local area. It also then makes appropriate recommendations for future development access arrangements.

#### **2 Site Location**

- 2.1 The location of the site within Dilton Marsh is shown in **Figure 1** below. It is centrally located within the village with the Church and Primary School to the west and the Railway Station to the east.



**FIGURE 1: Site Location**

#### **3 Existing Access Arrangements and Local Highway Network**

- 3.1 The location of the site with respect to the local highway network immediately adjacent the site is shown on the plan attached as **Appendix A**.

- 3.2 Vehicle and pedestrian access to the existing No.34 property is taken from a shared private driveway which leads from Petticoat Lane. The shared private driveway also serves the car park associated with the Dilton Marsh Social Club and provides access to other land beyond the Social Club on the southern side of the driveway. It also serves a separate storage unit of approximately 145m<sup>2</sup> floor area that is associated with the Building Contractor business of the site owner.
- 3.3 For the most part, the driveway is approximately 3.25m in width and of a tarmac construction but is up to 5m in width in the immediate vicinity of the storage unit and the separate driveway to the No.34 property itself. The alignment is broadly straight and level once away from the junction with Petticoat Lane.
- 3.4 Where the driveway meets Petticoat Lane, the junction form is a simple priority T with the bell mouth being approximately 6m in width. This width is constrained by the presence of a boundary wall to No.36 Petticoat Lane on the northern side and a post and rail fence on the southern side. See **Photograph 1** below:



**PHOTOGRAPH 1: Existing Site Access**

- 3.5 Visibility to the left on egress from the driveway is approximately 6m to the nearside edge of carriageway or 12m to the centreline. The visibility is restricted by the presence of a high stone boundary wall positioned at the edge of the carriageway.

- 3.6 To the right on egress, visibility is approximately 21m to the nearside edge of carriageway or approximately 33m to the centreline. **Photograph 2** and **Photograph 3** below show the existing visibility splays in each direction.



**PHOTOGRAPH 2: Visibility to the Left**



**PHOTOGRAPH 3: Visibility to the Right**

- 3.7 The above visibility is measured from a point 2.4m back from the carriageway edge along the centreline of the driveway and needs to be related to the recommended visibility for the 30mph speed limit that applies to Petticoat Lane, i.e. 2.4m by 43m. The available visibility in both directions is therefore below that theoretically required for the posted speed limit.
- 3.8 Notwithstanding, visibility can be based on the actual speed of passing traffic when this is known and to this end an Automatic Traffic Counter (ATC) loop was installed on Petticoat Lane between Wednesday 10<sup>th</sup> July and Tuesday 16<sup>th</sup> July 2019. The results are attached as **Appendix B** of this Note and are summarised in **Table 1** overleaf.
- 3.9 Daily traffic flows on Petticoat Lane are very low being approximately 160 two-way vehicles per day and up to approximately 20 two-way vehicles in the worst case peak hour. This equates to one vehicle travelling in one direction or the other every three minutes on average.

- 3.10 Average traffic speeds are approximately 15mph whereas the 85<sup>th</sup> percentile speeds (used for design purposes) are less than 18mph. Existing traffic speeds are therefore also very low.

	Northwest B'nd	Southeast B'nd	Two-way
AM Peak (weekday average)	10	9	19
PM Peak (weekday average)	6	6	12
Daily (weekday average)	80	77	157
Average Speed	15.0mph	14.4mph	n/a
85 <sup>th</sup> percentile speed	17.4mph	15.9mph	n/a

**TABLE 1: Results of ATC Survey**

- 3.11 Based on the speeds recorded through the ATC, it is clear that a design speed of 20mph is more appropriate than the 30mph speed limit. A 20mph design speed equates to required visibility splays of 2.4m by 25m. Visibility to the left on egress from the existing driveway therefore remains below that required while visibility to the right on egress is broadly at the required level.
- 3.12 The low traffic volumes and low traffic speeds are a function of the nature of Petticoat Lane and its position in the highway network. In the past, the Lane provided a route between the A3098 at the bottom of Tower Hill and Dilton Marsh village centre, however, the road system was reconfigured as part of the large scale residential development at nearby Westbury Leigh. Although still a through route, Petticoat Lane no longer provides the short cut it once did and hence traffic volumes are low.
- 3.13 The southeast end of the Lane is very narrow with signage advising of a 6' width restriction except for access. There is also a low railway bridge subject to a 13' 9" height restriction. Elsewhere along the length of the Lane there are numerous driveway accesses, limited footway provision, restricted forward visibility and a variable carriageway width that does not generally allow two opposing vehicles to pass without care being taken.
- 3.14 The northwest section of the Lane is generally of a higher standard with the carriageway width in the immediate vicinity of the shared private driveway being approximately 4.8m. This then narrows to approximately 3.5m on the approach to the Whitecroft side road junction before widening again to approximately 5.5m on the approach to its junction with the B3099 High Street.
- 3.15 Visibility on egress from Petticoat Lane at the High Street junction is generally good although occasionally impacted by on-street parking when looking to the left.
- 3.16 Pedestrian footways beside Petticoat Lane are available in short lengths in various locations however there is no continuity along the length. In many locations there are no footways with pedestrians and vehicles needing to share the available carriageway width.

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3.17 The design guide ‘Manual for Streets’ identifies that the concept of ‘shared space’ is acceptable where two-way traffic flows are generally less than approximately 100 vehicles per hour. The ATC identified peak hour traffic flows of approximately 20 two-way vehicles meaning that Petticoat Lane currently operates appropriately as a shared space environment. This is particularly the case given that there are numerous gateways and driveways that allow pedestrians to temporarily step out of the path of approaching vehicles should they wish to do so.

#### **4 Proposed Development Access Arrangements**

4.1 As previously identified, the site is being promoted for residential development through the Dilton Marsh Neighbourhood Plan process. At present there are no architectural layout plans for the potential development and therefore the number of residential dwellings the site could accommodate is not known.

4.2 Typical housing densities are between 30 and 40 dwellings per hectare so, based simply on the 0.98 hectare site area, it could accommodate up to 40 dwellings. However, there are boundary constraints associated with the site so it is considered more likely that development would be limited to approximately 30 dwellings.

4.3 A development of up to 30 dwellings would require an access built to adoptable standards and provided with visibility splays that accord with the traffic speeds recorded through the ATC. The plan attached as **Appendix C** of this Note identifies an appropriate access layout and is discussed further below.

4.4 The standard carriageway width for this scale of development is 5.5m although it may be possible to reduce this to 4.8m through discussion with the Highway Authority. The access plan shows provision of a 5.5m carriageway width as a worst case. The access plan also shows provision of 2.4m by 25m visibility splays in both directions suitable for a 20mph design speed (ATC identified a maximum 85<sup>th</sup> percentile speed of 17.4mph).

4.5 To the right on egress from the proposed access, an appropriate splay can be provided although this passes slightly over the existing parking area for No.32 Petticoat Lane. This property is owned by the potential applicant so it would be possible to reconfigure the parking area and access it from within the proposed development site should this be required. The area within the visibility splay could then be dedicated to the Highway Authority to secure the splay in the long term.

4.6 A similar situation exists when looking to the left on egress from the proposed access with the required visibility splay passing through the garden area of No.36 Petticoat Lane. Again, this property is owned by the potential applicant so it would be possible to realign the existing boundary wall to provide the required splay. It would also be possible to relocate the off-street parking associated with this property to remove it from the access junction itself.

4.7 The proposed access plan also shows provision of a 2.0m wide pedestrian footway beside the site access road. This is shown connecting to the existing section of footway on the northern side of Petticoat Lane.

- 
- 4.8 Within the site, the existing driveway leading to the Social Club is shown slightly realigned such that it forms a side road to the newly created residential access road.

## **5 Traffic Impact**

- 5.1 An initial review of the TRICS trip rate database identifies that a typical residential development in a location such as Dilton Marsh would likely generate approximately 0.45 two-way vehicle trips per dwelling in the AM peak hour, approximately 0.53 two-way vehicle trips per dwelling in the PM peak hour, and approximately 4.53 two-way vehicle trips per dwelling across the course of a 12 hour day.
- 5.2 Assuming up to 30 new dwellings, this equates to an additional 14, 16 and 136 two-way vehicle movements on Petticoat Lane during the AM peak hour, PM peak hour and across the 12 hour day respectively. Referencing the results of the ATC in Table 1 above, the proposals would effectively double the volume of traffic using the lane which is considered accurate given that the lane already provides access to a similar number of properties.
- 5.3 Post development, two-way traffic flows on Petticoat Lane would increase to approximately 35 two-way vehicles in the worst case AM and PM highway peak hours. This remains a small number equating to one vehicle travelling in one direction or the other every 1.7 minutes on average. The overall flow also remains less than the 100 vehicles per hour value identified by Manual for Streets as being appropriate for a shared space environment where there is no separate pedestrian footway provision.
- 5.4 It is considered that subject to provision of an appropriate site access junction (as previously discussed), the proposed residential development of the No.34 Petticoat Lane site would not lead to any significant adverse traffic impacts or require any off-site highway improvements.

## **6 Non-Car Accessibility**

- 6.1 The ability to walk, cycle and use public transport when travelling to and from a potential development site is also of importance in planning and highway terms. Sites can be refused planning permission where they are wholly reliant on use of the private car.
- 6.2 The walking distance to key day to day services and facilities is an important aspect with the Petticoat Lane site being relatively well served in this respect. The village provides a Primary School, Farm Shop, Post Office, Church, Social Club, Community Hall and Public House with a Convenience Store and Doctor's Surgery being available in nearby Westbury Leigh. All of these services and facilities are available within a walking time of approximately 15 minutes.
- 6.3 A cycling distance of 5km is generally taken as being acceptable for day to day journeys with this distance not only covering the whole of the village, but also the whole built up area of Westbury. This means that all the services, facilities and employment opportunities available within Westbury are accessible by cycling from the proposed site.

- 
- 6.4 The No. 47/X47 bus operates through Dilton Marsh with stops either side of High Street within approximately 200m walk of the centre of the site.
  - 6.5 The service operates an hourly frequency between Frome and Westbury (and return) and caters for day to day journeys to and from these higher order settlements.
  - 6.6 Dilton Marsh also benefits from a Railway Station located approximately 650m walk from the centre of the site. The Station provides 9 trains per day in both directions serving Westbury, Bristol, Chippenham, Swindon, Salisbury and Southampton and numerous other stations along the routes. Westbury Railway Station is within appropriate cycling distance of the site and provides additional services to a wider range of destinations including London Paddington.
  - 6.7 It is considered that the non-car accessibility of Dilton Marsh is good and that there are genuine opportunities for future residents of the proposed site to travel by sustainable modes of transport.

## **7 Conclusions**

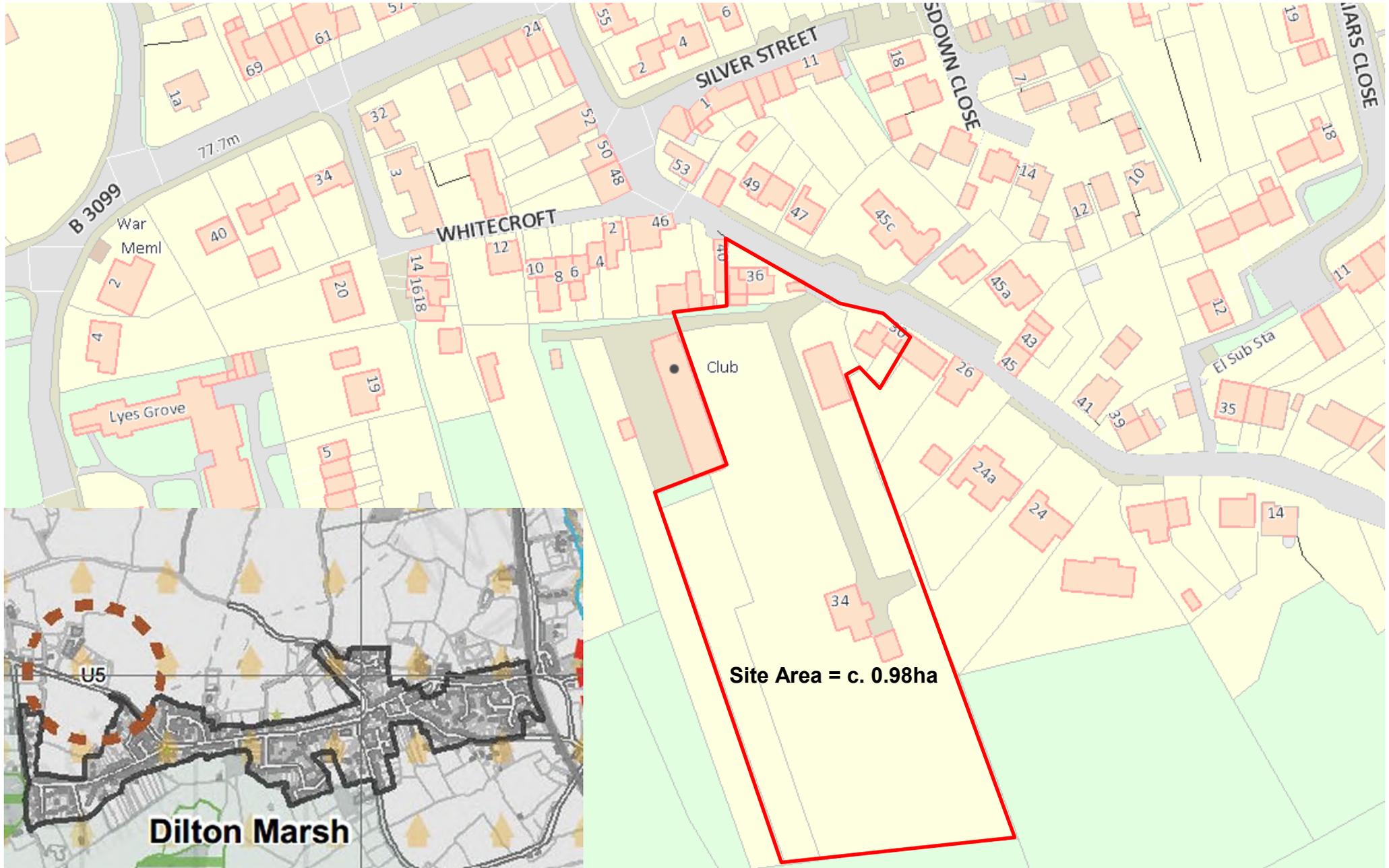
- 7.1 Land at No. 34 Petticoat Lane, Dilton Marsh is being promoted for residential development through the Dilton Marsh Neighbourhood Plan process. The site is just under 1 hectare in area and could accommodate up to approximately 30 residential units.
- 7.2 The existing vehicular access to the site would be upgraded to an adoptable standard with visibility splays provided commensurate with the existing traffic speeds on Petticoat Lane. Works would be required within the curtilage on No. 32 and 36 Petticoat Lane in order to create the required visibility splays however these properties are in the same ownership as the potential applicant and therefore the works are deliverable.
- 7.3 The upgraded access would also include a pedestrian footway linking to the existing footway on the northern side of Petticoat Lane.
- 7.4 Traffic flows on Petticoat Lane would increase by 16 two-way vehicle movements in the worst case PM peak hour, i.e. one extra vehicle travelling in one direction or the other approximately every 4 minutes on average. Overall traffic flows on Petticoat Lane post development would remain low at approximately 35 two-way vehicles in the worst case highway peak hours.
- 7.5 The increase in traffic flows would not warrant any off-site highway improvements as the two-way traffic flows remain much less than the 100 two-way vehicles per hour where footway provision becomes a requirement.
- 7.6 Dilton Marsh is a sustainable settlement with viable choices of travel mode for all trip purposes. The site is therefore not dependent solely on the use of the private car.
- 7.7 Given the above, it is considered that there are no transport or highway issues that would prevent future development of the No.34 Petticoat Lane, Dilton Marsh site.

## **APPENDIX A**

### **Site Location**

# Policy Map Extract & Site Photographs

## Land at Petticoat Lane, Dilton Marsh BA13 4DG



## **APPENDIX B**

### **Automatic Traffic Counter Results**

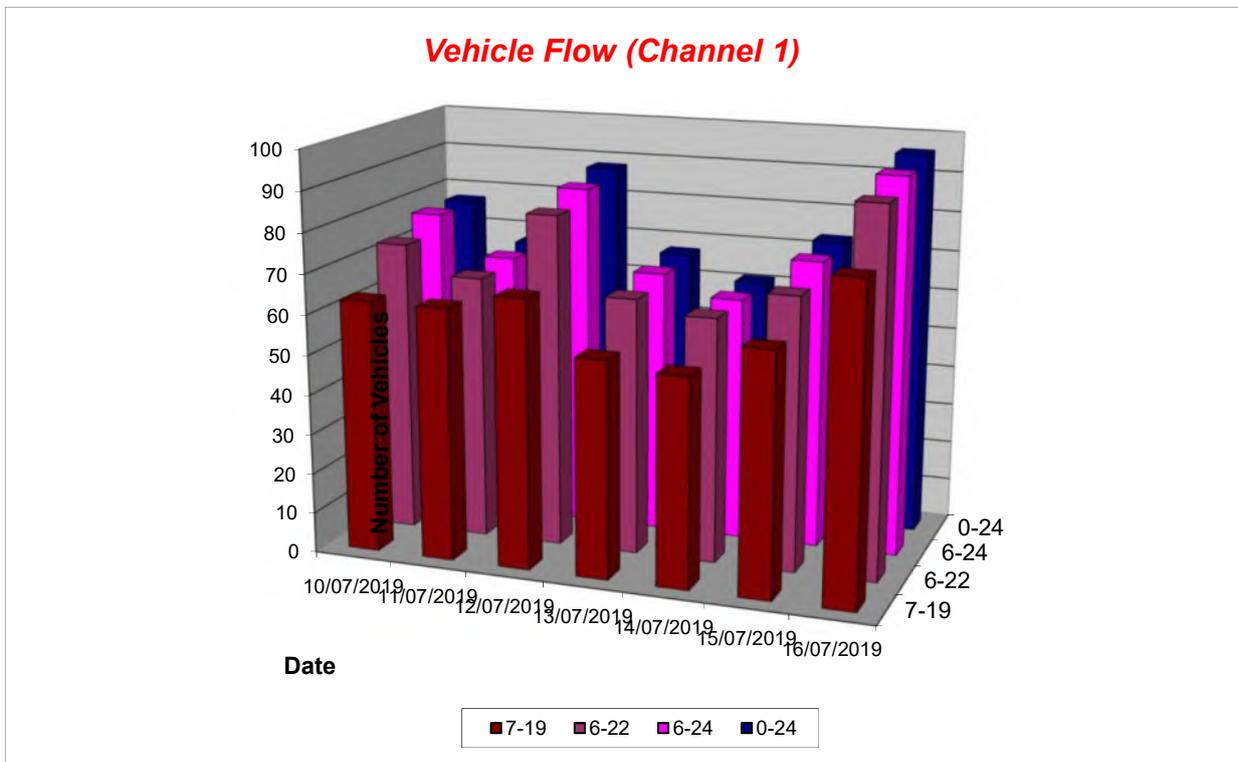
# Dilton Marsh ATC

Channel 1 - Northwestbound

Vehicle Flow

Week 1

Hr Ending	10/07/2019 Wednesday	11/07/2019 Thursday	12/07/2019 Friday	13/07/2019 Saturday	14/07/2019 Sunday	15/07/2019 Monday	16/07/2019 Tuesday	5 Day Ave	7 Day Ave
1	0	0	0	0	0	0	0	0	0
2	0	0	1	0	0	0	0	0	0
3	0	0	0	0	0	0	0	0	0
4	0	0	0	0	0	0	0	0	0
5	0	0	0	0	0	1	2	1	0
6	0	0	1	1	0	0	0	0	0
7	0	0	2	1	1	0	0	0	1
8	7	1	7	1	1	9	6	6	5
9	14	13	7	3	4	12	6	10	8
10	8	9	4	6	5	6	4	6	6
11	4	2	5	6	12	3	3	3	5
12	6	3	4	5	8	5	3	4	5
13	5	4	7	2	2	4	11	6	5
14	1	6	3	3	2	1	3	3	3
15	6	1	4	3	4	6	6	5	4
16	3	7	8	4	2	3	13	7	6
17	4	5	6	8	6	5	5	5	6
18	4	11	4	7	3	5	5	6	6
19	1	1	8	6	3	1	13	5	5
20	3	0	9	5	3	2	7	4	4
21	4	0	1	2	2	3	2	2	2
22	3	3	4	2	3	3	4	3	3
23	3	1	2	1	0	3	2	2	2
24	1	0	1	1	0	1	1	1	1
<b>7-19</b>	<b>63</b>	<b>63</b>	<b>67</b>	<b>54</b>	<b>52</b>	<b>60</b>	<b>78</b>	<b>66</b>	<b>62</b>
<b>6-22</b>	<b>73</b>	<b>66</b>	<b>83</b>	<b>64</b>	<b>61</b>	<b>68</b>	<b>91</b>	<b>76</b>	<b>72</b>
<b>6-24</b>	<b>77</b>	<b>67</b>	<b>86</b>	<b>66</b>	<b>61</b>	<b>72</b>	<b>94</b>	<b>79</b>	<b>75</b>
<b>0-24</b>	<b>77</b>	<b>67</b>	<b>88</b>	<b>67</b>	<b>61</b>	<b>73</b>	<b>96</b>	<b>80</b>	<b>76</b>



# Dilton Marsh ATC

## Channel 1 - Northwestbound

## Average Speed

## Week 1

Hr Ending	10/07/2019 Wednesday	11/07/2019 Thursday	12/07/2019 Friday	13/07/2019 Saturday	14/07/2019 Sunday	15/07/2019 Monday	16/07/2019 Tuesday
1	-	-	-	-	-	-	-
2	-	-	15.5	-	-	-	-
3	-	-	-	-	-	-	-
4	-	-	-	-	-	-	-
5	-	-	-	-	-	15.5	15.5
6	-	-	15.5	15.5	-	-	-
7	-	-	15.5	15.5	25.5	-	-
8	16.9	25.5	12.5	15.5	15.5	16.5	15.4
9	16.9	15.4	13.9	18.8	15.5	17.2	15.4
10	12.9	13.2	10.2	15.4	19.5	13.8	10.2
11	12.9	10.2	15.5	12.0	12.9	12.0	12.0
12	15.4	15.5	10.2	19.5	16.8	15.4	8.5
13	11.3	12.9	16.9	20.5	20.5	12.9	17.3
14	15.5	18.8	12.0	12.0	15.5	15.5	12.0
15	13.8	25.5	15.5	15.5	15.5	13.8	15.5
16	15.5	15.5	15.4	18.0	10.2	15.5	14.6
17	12.9	13.3	15.5	18.0	20.5	13.4	15.5
18	12.9	14.5	12.9	11.0	15.5	13.4	11.3
19	15.5	15.5	15.4	15.5	15.3	15.5	15.5
20	8.5	-	14.3	13.4	15.5	10.2	12.5
21	12.8	-	15.5	15.5	20.5	15.3	15.5
22	8.5	15.5	12.9	15.5	22.2	15.3	12.9
23	15.5	15.5	15.5	15.5	-	15.5	15.5
24	25.5	-	25.5	5.0	-	25.5	25.5
10-12	14.4	13.4	13.2	15.4	14.4	14.1	10.2
14-16	14.3	16.8	15.4	16.9	13.8	14.3	14.9
0-24	14.2	15.1	14.4	15.3	16.6	15.0	14.5

Average	15.0
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## Channel 1 - Northwestbound

## 85th Percentile

Hr Ending	10/07/2019 Wednesday	11/07/2019 Thursday	12/07/2019 Friday	13/07/2019 Saturday	14/07/2019 Sunday	15/07/2019 Monday	16/07/2019 Tuesday
1	-	-	-	-	-	-	-
2	-	-	-	-	-	-	-
3	-	-	-	-	-	-	-
4	-	-	-	-	-	-	-
5	-	-	-	-	-	-	15.8
6	-	-	-	-	-	-	-
7	-	-	16.0	-	-	-	-
8	26.2	-	15.6	-	-	25.7	25.6
9	17.0	26.3	16.5	25.8	15.5	26.0	25.5
10	16.1	15.6	16.2	26.1	26.0	15.8	16.0
11	15.8	16.1	15.5	15.7	16.4	16.1	16.2
12	25.8	16.0	16.1	25.7	16.9	26.0	16.0
13	16.3	15.8	25.6	26.1	26.2	15.7	26.3
14	-	26.1	15.6	15.6	16.0	-	15.6
15	16.3	-	16.3	16.0	16.0	16.2	15.7
16	16.3	15.8	25.8	26.4	16.0	16.0	26.2
17	16.2	25.8	15.5	25.8	25.9	15.9	16.0
18	15.5	26.3	15.8	16.3	15.9	15.6	15.9
19	-	-	15.9	15.9	25.8	-	15.6
20	16.4	-	15.8	15.8	15.6	16.0	16.2
21	26.3	-	-	16.4	25.7	26.3	16.4
22	15.9	16.1	16.5	16.1	26.5	26.1	16.0
23	16.5	-	15.9	-	-	16.3	15.6
24	-	-	-	-	-	-	-
10-12	15.6	16.4	15.7	25.6	15.6	15.7	15.9
14-16	16.4	16.8	25.7	17.0	15.9	15.6	16.0
0-24	15.9	16.2	16.1	16.2	25.9	15.6	16.0

85th %ile	17.4
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# Dilton Marsh ATC

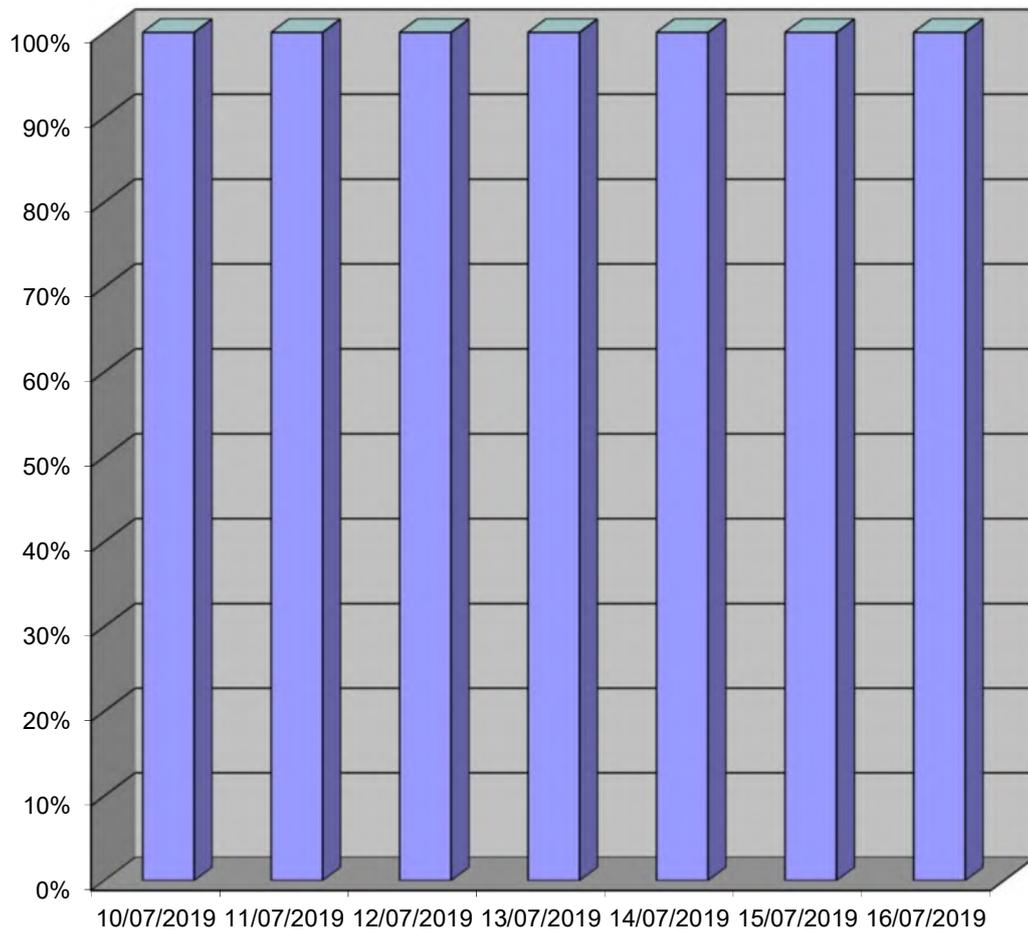
Channel 1 - Northwestbound

Speed Summary

Week 1

Speed (MPH)	10/07/2019 Wednesday	11/07/2019 Thursday	12/07/2019 Friday	13/07/2019 Saturday	14/07/2019 Sunday	15/07/2019 Monday	16/07/2019 Tuesday
0-30	77	67	88	67	61	73	96
31-45	0	0	0	0	0	0	0
46-60	0	0	0	0	0	0	0
61-	0	0	0	0	0	0	0
<b>TOTAL</b>	<b>77</b>	<b>67</b>	<b>88</b>	<b>67</b>	<b>61</b>	<b>73</b>	<b>96</b>

**Speed Summary (MPH)**



# Dilton Marsh ATC

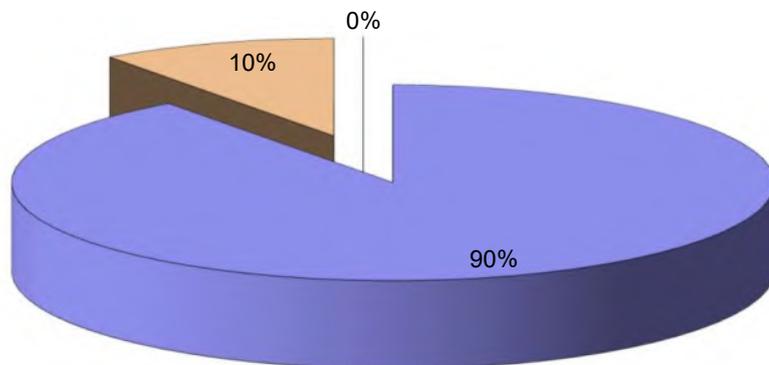
Channel 1 - Northwestbound

Vehicle Class

Week 1

Classes Day / Time	Car / LGV / Caravan - 1	OGV1 / Bus - 2,3,5,6,7,12	OGV2 - 4,8,9,10,11,13	TOTAL - 1-13
<b>10/07/2019</b>				
7-19	55	8	0	63
6-22	64	9	0	73
6-24	68	9	0	77
0-24	68	9	0	77
<b>11/07/2019</b>				
7-19	52	11	0	63
6-22	55	11	0	66
6-24	56	11	0	67
0-24	56	11	0	67
<b>12/07/2019</b>				
7-19	60	7	0	67
6-22	76	7	0	83
6-24	78	8	0	86
0-24	79	9	0	88
<b>13/07/2019</b>				
7-19	50	4	0	54
6-22	60	4	0	64
6-24	62	4	0	66
0-24	63	4	0	67
<b>14/07/2019</b>				
7-19	51	1	0	52
6-22	60	1	0	61
6-24	60	1	0	61
0-24	60	1	0	61
<b>15/07/2019</b>				
7-19	52	8	0	60
6-22	59	9	0	68
6-24	63	9	0	72
0-24	64	9	0	73
<b>16/07/2019</b>				
7-19	70	8	0	78
6-22	82	9	0	91
6-24	84	10	0	94
0-24	86	10	0	96
<b>Average</b>				
7-19	56	7	0	62
6-22	65	7	0	72
6-24	67	7	0	75
0-24	68	8	0	76

**Total Vehicle Class Distribution**



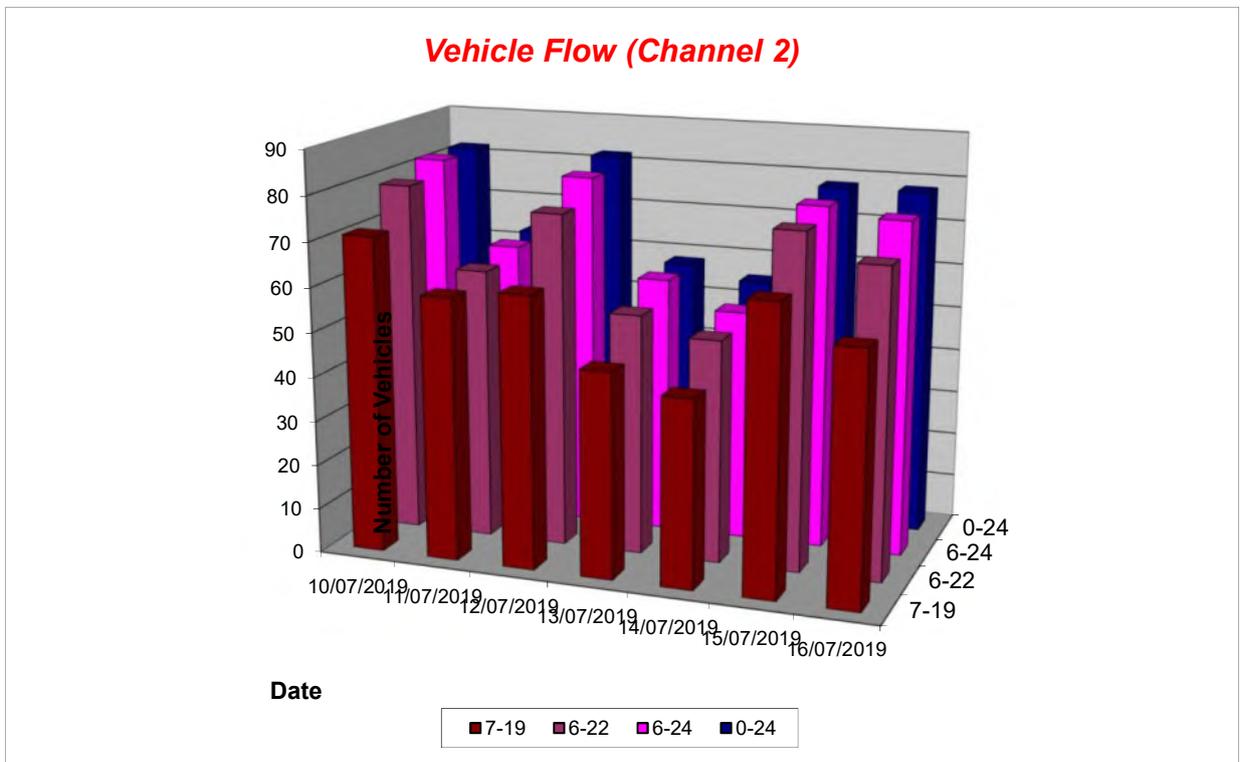
# Dilton Marsh ATC

Channel 2 - Southeastbound

Vehicle Flow

Week 1

Hr Ending	10/07/2019 Wednesday	11/07/2019 Thursday	12/07/2019 Friday	13/07/2019 Saturday	14/07/2019 Sunday	15/07/2019 Monday	16/07/2019 Tuesday	5 Day Ave	7 Day Ave
1	0	0	0	0	1	0	0	0	0
2	0	0	0	0	1	0	0	0	0
3	0	0	0	0	0	1	0	0	0
4	0	0	0	0	0	0	0	0	0
5	0	0	0	0	1	0	0	0	0
6	0	0	2	0	0	0	3	1	1
7	0	0	0	0	0	0	0	0	0
8	3	1	3	1	0	2	4	3	2
9	15	8	5	3	2	11	4	9	7
10	3	4	3	4	4	3	5	4	4
11	3	2	7	4	7	4	8	5	5
12	3	6	5	2	7	4	4	4	4
13	9	8	10	6	5	5	10	8	8
14	3	3	3	2	4	2	2	3	3
15	2	7	2	3	4	2	1	3	3
16	13	11	4	4	4	12	6	9	8
17	5	3	7	3	1	9	3	5	4
18	8	5	7	4	1	7	4	6	5
19	4	1	5	10	3	3	5	4	4
20	3	0	1	4	2	5	1	2	2
21	4	0	7	3	6	4	4	4	4
22	1	2	6	1	0	2	8	4	3
23	2	2	4	3	1	2	5	3	3
24	1	0	1	1	1	0	1	1	1
7-19	71	59	61	46	42	64	56	62	57
6-22	79	61	75	54	50	75	69	72	66
6-24	82	63	80	58	52	77	75	75	70
0-24	82	63	82	58	55	78	78	77	71



# Dilton Marsh ATC

## Channel 2 - Southeastbound

## Average Speed

Week 1

Hr Ending	10/07/2019 Wednesday	11/07/2019 Thursday	12/07/2019 Friday	13/07/2019 Saturday	14/07/2019 Sunday	15/07/2019 Monday	16/07/2019 Tuesday
1	-	-	-	-	25.5	-	-
2	-	-	-	-	15.5	-	-
3	-	-	-	-	-	25.5	-
4	-	-	-	-	-	-	-
5	-	-	-	-	15.5	-	-
6	-	-	15.5	-	-	-	15.5
7	-	-	-	-	-	-	-
8	15.5	5.0	12.0	15.5	-	15.5	12.9
9	13.4	12.9	11.3	22.2	15.5	11.7	15.5
10	12.0	7.6	12.0	10.2	15.5	12.0	15.4
11	8.5	10.2	12.5	15.5	16.9	7.6	11.6
12	18.8	15.5	9.2	10.2	14.0	20.5	7.6
13	15.4	11.6	12.3	13.8	15.5	15.4	13.4
14	15.5	15.5	5.0	15.5	18.0	15.5	5.0
15	15.5	14.0	10.2	12.0	18.0	15.5	5.0
16	14.7	14.5	15.5	18.0	15.5	15.5	15.5
17	15.4	15.5	16.9	12.0	15.5	16.6	15.5
18	11.5	15.5	15.5	18.0	15.5	13.9	15.5
19	20.5	15.5	15.5	13.4	18.8	18.8	15.5
20	12.0	-	15.5	10.2	15.5	15.4	15.5
21	12.8	-	14.0	15.5	15.4	15.4	15.5
22	15.5	10.2	15.5	5.0	-	15.5	15.5
23	10.2	15.5	15.4	15.5	15.5	10.2	15.4
24	33.0	-	25.5	25.5	15.5	-	25.5
10-12	13.7	14.2	11.1	13.8	15.5	14.1	10.2
14-16	14.8	14.3	13.8	15.4	16.8	15.5	14.0
0-24	14.4	13.3	13.6	14.4	16.2	14.8	14.0

Average 14.4

## Channel 2 - Southeastbound

## 85th Percentile

Hr Ending	10/07/2019 Wednesday	11/07/2019 Thursday	12/07/2019 Friday	13/07/2019 Saturday	14/07/2019 Sunday	15/07/2019 Monday	16/07/2019 Tuesday
1	-	-	-	-	-	-	-
2	-	-	-	-	-	-	-
3	-	-	-	-	-	-	-
4	-	-	-	-	-	-	-
5	-	-	-	-	-	-	-
6	-	-	16.4	-	-	-	16.2
7	-	-	-	-	-	-	-
8	15.7	-	16.1	-	-	16.2	15.9
9	15.8	15.8	15.8	26.2	16.0	16.0	16.2
10	15.6	15.8	15.6	15.7	15.7	16.1	25.8
11	16.1	15.5	16.0	15.9	17.0	15.7	15.9
12	25.7	16.0	15.7	16.0	16.2	26.0	15.9
13	26.4	15.7	16.5	16.3	16.1	26.2	16.4
14	15.6	16.4	5.1	16.0	26.3	16.3	5.1
15	15.9	16.1	15.5	15.9	25.7	15.9	-
16	15.8	16.3	15.8	26.0	16.3	16.4	15.8
17	26.4	16.4	17.0	15.7	-	26.2	15.6
18	16.3	15.8	16.4	26.1	-	15.6	15.7
19	25.8	-	16.0	16.0	25.6	26.1	15.6
20	16.2	-	-	16.2	15.6	26.2	-
21	25.8	-	16.3	16.4	26.3	25.5	16.5
22	-	15.6	16.3	-	-	15.9	16.0
23	15.5	16.1	26.2	15.8	-	15.9	26.0
24	-	-	-	-	-	-	-
10-12	26.3	15.9	16.5	15.7	15.6	25.8	15.7
14-16	15.8	16.5	15.8	16.0	16.8	16.5	15.9
0-24	15.7	15.6	16.0	15.7	16.3	16.3	15.9

85th %ile 15.9

# Dilton Marsh ATC

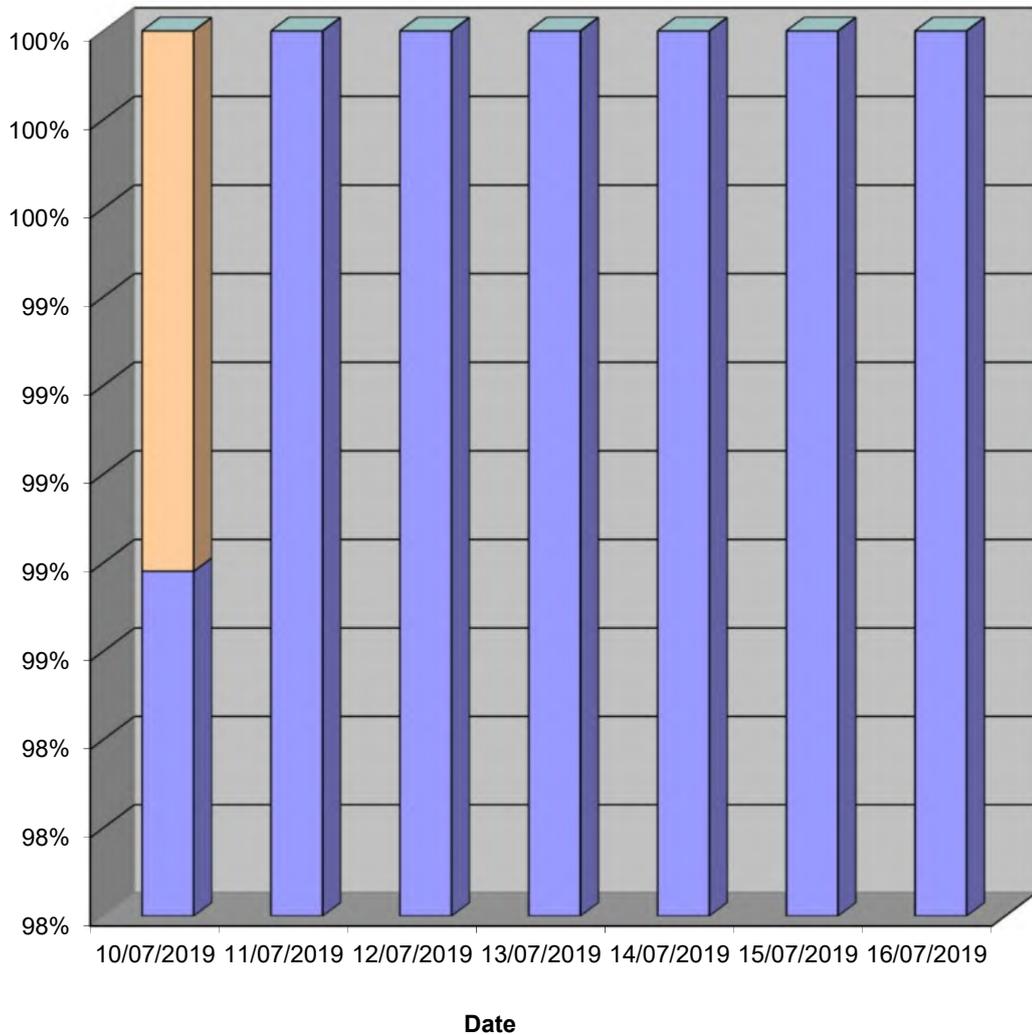
Channel 2 - Southeastbound

Speed Summary

Week 1

Speed (MPH)	10/07/2019 Wednesday	11/07/2019 Thursday	12/07/2019 Friday	13/07/2019 Saturday	14/07/2019 Sunday	15/07/2019 Monday	16/07/2019 Tuesday
0-30	81	63	82	58	55	78	78
31-45	1	0	0	0	0	0	0
46-60	0	0	0	0	0	0	0
61-	0	0	0	0	0	0	0
<b>TOTAL</b>	<b>82</b>	<b>63</b>	<b>82</b>	<b>58</b>	<b>55</b>	<b>78</b>	<b>78</b>

**Speed Summary (MPH)**



# Dilton Marsh ATC

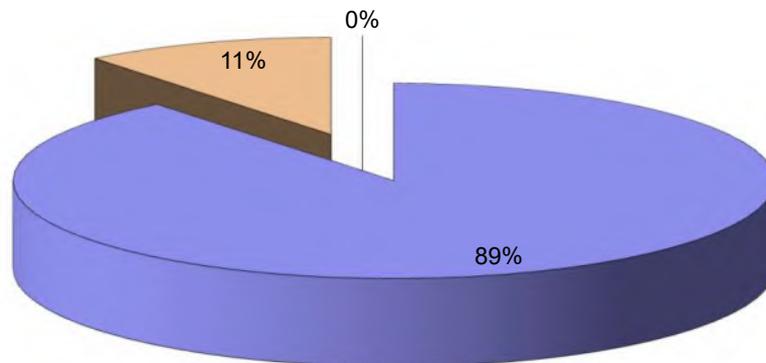
Channel 2 - Southeastbound

Vehicle Class

Week 1

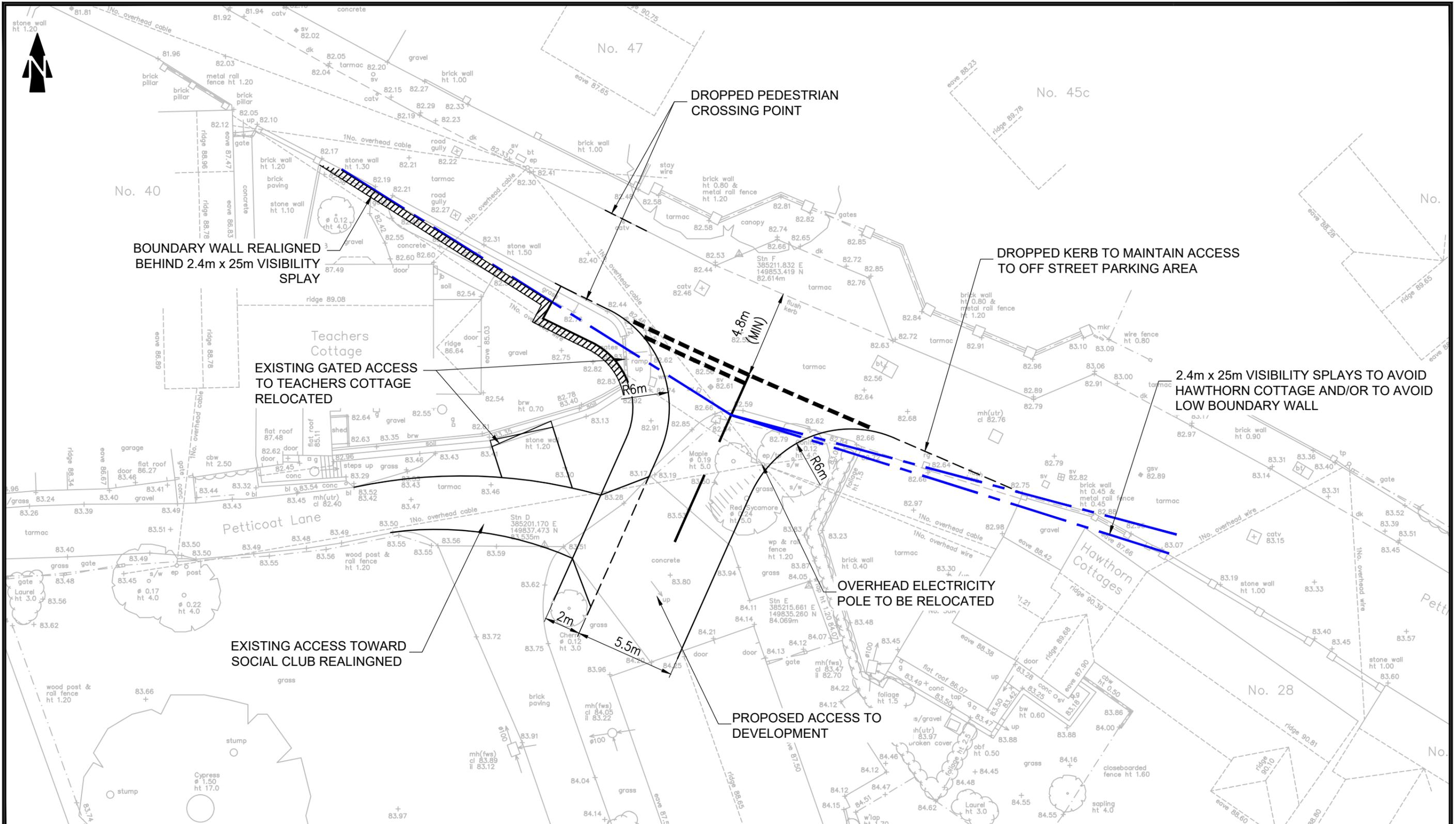
Classes Day / Time	Car / LGV / Caravan - 1	OGV1 / Bus - 2,3,5,6,7,12	OGV2 - 4,8,9,10,11,13	TOTAL - 1-13
<b>10/07/2019</b>				
7-19	62	9	0	71
6-22	70	9	0	79
6-24	72	10	0	82
0-24	72	10	0	82
<b>11/07/2019</b>				
7-19	47	12	0	59
6-22	49	12	0	61
6-24	51	12	0	63
0-24	51	12	0	63
<b>12/07/2019</b>				
7-19	57	4	0	61
6-22	71	4	0	75
6-24	76	4	0	80
0-24	77	5	0	82
<b>13/07/2019</b>				
7-19	41	5	0	46
6-22	49	5	0	54
6-24	53	5	0	58
0-24	53	5	0	58
<b>14/07/2019</b>				
7-19	41	1	0	42
6-22	49	1	0	50
6-24	51	1	0	52
0-24	54	1	0	55
<b>15/07/2019</b>				
7-19	53	11	0	64
6-22	64	11	0	75
6-24	66	11	0	77
0-24	67	11	0	78
<b>16/07/2019</b>				
7-19	48	8	0	56
6-22	61	8	0	69
6-24	67	8	0	75
0-24	69	9	0	78
<b>Average</b>				
7-19	50	7	0	57
6-22	59	7	0	66
6-24	62	7	0	70
0-24	63	8	0	71

**Total Vehicle Class Distribution**



## **APPENDIX C**

### **Proposed Site Access Arrangement**



BOUNDARY WALL REALIGNED BEHIND 2.4m x 25m VISIBILITY SPLAY

DROPPED PEDESTRIAN CROSSING POINT

DROPPED KERB TO MAINTAIN ACCESS TO OFF STREET PARKING AREA

EXISTING GATED ACCESS TO TEACHERS COTTAGE RELOCATED

2.4m x 25m VISIBILITY SPLAYS TO AVOID HAWTHORN COTTAGE AND/OR TO AVOID LOW BOUNDARY WALL

OVERHEAD ELECTRICITY POLE TO BE RELOCATED

EXISTING ACCESS TOWARD SOCIAL CLUB REALIGNED

PROPOSED ACCESS TO DEVELOPMENT

REV	DETAILS	DRAWN	CHECKED	DATE

**NOTES:**

1. Do not scale from this drawing.
2. This drawing is for illustrative purposes only and not for construction.
3. This drawing is to be read and printed in colour.
4. No 34 Petticoat Lane Hawthorn Cottages and Teachers Cottage are all in the promoters ownership.

PROJECT:  
**No 34 PETTICOAT LANE, DILTON MARSH**

DRAWING TITLE:  
**PROPOSED SITE ACCESS**

DRAWN: SLW	CHECKED: CDM	DATE: 21.08.20189	SCALES: 1:200	SHEET SIZE: A3
---------------	-----------------	----------------------	------------------	-------------------

CLIENT:  
[REDACTED]

**MILES WHITE**  
TRANSPORT

DRAWING NUMBER:  
**19068-GA01**

REVISION:  
-



- EXISTING LANDSCAPE FEATURE
- PROPOSED PUBLIC OPEN SPACE
- DEVELOPABLE AREA
- POTENTIAL ACCESS ROAD
- OWNERSHIP BOUNDARY
- APPLICATION SITE BOUNDARY  
AREA: 0.9ha

**MITCHELL  
ELEY  
GOULD**

PETTICOAT LANE  
DILTON MARSH  
PARAMETER PLAN

SURVEY FEB 2020 1:250@A1 CH SG  
2038 AP(0)04 -

© MITCHELL ELEY GOULD ARCHITECTS  
01225 789033 WHARF STUDIO WIDCOMBE HILL BATH BA2 6AA  
SCALE BAR 1:1250