

Rep ID: WEST001	
Consultee code: General Public	Consultee Organisation (if applicable):
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below:
WE1. What do you think to the scale of growth? Should there be a brownfield target?	
Yes, there should be a brownfield target, and it should be higher. Most of Westbury's new housing in the past 20 years has been built on - literally - green fields. Further greenfield development will destroy the town's character completely.	
WE2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?	
Westbury does not need more housing development. The town centre is effectively dead and the residents in the recent developments mainly use Westbury as a dormitory town - they do not use its (admittedly meagre) facilities. Increasing the population with yet more development will not revive the town - it will merely add to the traffic problems. A bypass is certainly needed but its construction cannot be relied upon in other than the very long term.	

Westbury's rail links are good, but as the station is not in the town centre co-ordination is needed with bus services. There should be a shuttle running between the station and the town centre so that passengers do not have to go by car and park at the station. (This in itself could reduce traffic in Oldfield Road).

WE3. Is this the right pool of potential development sites?

Most of the sites listed are fields currently used for agriculture or are "wild" areas important to Westbury's setting as a small market town. Building on these fields would be deplorable but I object particularly to development site 6 (Chalford Gardens), site 7 (Sandhole Lane), sites 9 and 10 (expanding Leigh Park across Mane Way) and site 11 (Redland Lane (presumably the youth football ground)).

The tannery site at Clydesdale Road, as a brownfield site, should be considered.

WE4. What land do you think is the most appropriate upon which to build?

I consider that Westbury has already had more than its fair share of greenfield development (and there are sites still being developed) - there should be a moratorium on further development. The least objectionable sites would be very small infills or extensions to existing sites.

WE5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?

The fact that Westbury has been turned into a dormitory town in the past 20 years by injudicious development has not been taken into account. Further development would drown its historic centre. The emphasis should be on preserving - and improving - what remains rather than foisting yet another increase in population and loss of countryside upon its residents.

WE6. Are there any issues or infrastructure requirements that should be identified?

Westbury needs a bypass. This should take priority over building more houses.
Has the market for the putative new developments been properly identified? Will people come to live in Westbury just because it is cheaper than the surrounding area?

Further comments

Rep ID: WEST002	
Consultee code: General Public	Consultee Organisation (if applicable): N/A
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below:
WE1. What do you think to the scale of growth? Should there be a brownfield target?	
<p>To my mind, the most serious shortcoming in new-build housing developments in the town to date has been a tendency to build needlessly dense estates- houses are crammed together with small gardens and inadequate on- and off-street parking provisions quite unsuitable for family homes. Given the huge amount of essentially empty space surrounding the town (much of which is not AONB, SSSI etc), I do not believe that a brownfield target is necessary in this area. Indeed the fixation with minimising the amount of land given over to meeting housing needs is resulting in housing stock that doesn't in fact do a very good job of meeting needs at all. Assuming a requirement to build family homes, I would suggest that the density of new developments should not be permitted to result in each plot incorporating less than ca. 0.1 acres of land. This requirement will ensure adequate space to accommodate off-street parking, as well as reducing the social problems and conflicts that stem from having too many people in overly close proximity, with inadequate private space.</p>	
WE2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be	

achieved?

Westbury is a relatively small town, a significant distance from its nearest neighbours. This limits its suitability for 'sustainable' transport links (whatever that may be taken to mean). A pragmatic assessment of the realities of the local geography leads me to conclude that private motor vehicles are and will remain the predominant mode of transport in the area, and accommodating that reality should be the priority.

Insofar as there is any air quality issue in Westbury, it is- as noted- due to the fact that the town requires a bypass and has been repeatedly refused funding to deliver one. This should be a high priority. I would also suggest that the traffic calming measures in Oldfield Rd (the obstacles blocking one half of the road- not the speed bumps) have long been rendered redundant by the number of parked vehicles acting as traffic-calming obstacles at any given time. At this point the traffic-calming measures are simply causing congestion and should in most cases be removed.

Re. Point 5: If housing is built to a decent standard- i.e. incorporate suitable large private gardens (and if they're intended as family homes then they should), then the need for 'open spaces and landscaping' is largely negated.

Re. Point 6: Employment prospects in the town are subject to various macroeconomic factors that aren't really within the gift of local housing developments to influence.

WE3. Is this the right pool of potential development sites?

There are no obvious issues with developing these areas as far as I am aware.

WE4. What land do you think is the most appropriate upon which to build?

The most notable feature of the housing stock in this part of Wiltshire is that it is too small and too dense. People buy them because they have little option. There is a demand for large, spacious properties that is not being met, and given that this is one of England's largest and least densely populated counties there is little excuse for this shortcoming.

WE5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?

The meandering and labyrinthine road layouts typically seen in new-build estates reduces the availability of on-street parking and makes them difficult to police. There are likely social benefits to adopting a more linear, grid-like approach to road layouts in future.

WE6. Are there any issues or infrastructure requirements that should be identified?

I note that the number of GPs per head of population is higher in Westbury than in many areas. Nonetheless- I would recommend a reassessment of the capacity of the local health centre. It has not been my experience that capacity is currently sufficient for demand- at least based on the lead time required for medical appointments (even before COVID). Increasing the local population will presumably exacerbate this.

Further comments

I am sceptical that the employment opportunities in the local area particularly justify increasing the housing stock and thus population at this location. The new development near the railway station is clearly intended to exploit the excellent access the town enjoys to the Great Western Mainline- i.e. it is a dormitory suburb for commuters working elsewhere. I suspect much of the on-going demand for housing in the area is also driven by access to the rail network rather than any particularly appealing local employment opportunity. If it were to be established that housing is largely sought by people looking to commute elsewhere to work ever morning then it would be more convenient for them, as well as more efficient and thus environmentally sound to focus on building housing nearer the actual destinations that the commuters are heading for. (Bristol, Trowbridge and the M4 Corridor I suspect).

Rep ID: WEST003

Consultee code: General Public

Consultee Organisation (if applicable):

Is this response on behalf of someone else/another organisation? No

Organisation being represented (if applicable):

Does this representation refer to attachment(s):
no

If this representation refers to attachment(s), these are listed below:

WE1. What do you think to the scale of growth? Should there be a brownfield target?

Far too much growth for a small rural town with not nearly enough infrastructure. Obviously as much building as possible should be on brownfield sites.

WE2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?

More emphasis should be given to preserving, improving and maintaining the existing wildlife sites and old trees. The aim of becoming carbon neutral should be enforced.

WE3. Is this the right pool of potential development sites?

Areas 3 and 6 should not be considered. 3 provides an important corridor between the Mead lakes, Vivash Park and Frogmore lake. Area 6 contains the important ancient wood around the Wellhead and is on the edge of the scenic White Horse downland area and should obviously not be developed.

WE4. What land do you think is the most appropriate upon which to build?

Areas 1, 2 and 10 are the most logical - close to existing developments, good transport links and industrial estates.

WE5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?

Already mentioned

WE6. Are there any issues or infrastructure requirements that should be identified?

Desperate need for a bypass to remove heavy traffic and consequent air pollution from the town.

Further comments

Rep ID: WEST004	
Consultee code: General Public	Consultee Organisation (if applicable):
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below:
WE1. What do you think to the scale of growth? Should there be a brownfield target?	
This does seem to be a lot of houses for what is a small town. Westbury already has plenty of houses, with more and more fields and green areas being turned over to houses. Surely it would be better to focus on the houses we already have and have planned, ensure that Westbury can function as a community before building more houses?	
WE2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?	
Number 4 is a key priority as the A350 is already causing huge problems, both with air quality and with safety. We need the A350 to be diverted around Westbury, as it is indeed around other towns in Wiltshire. I am a keen cyclist, but always avoid the A350 because it is so congested.	

The plan says that our surgery has no capacity issues. I do not know how you judge this, but the situation to a Westbury resident has real difficulty in accessing their doctor (and this is pre-Covid). A priority should be ensuring that the GP surgery can offer good care to existing residents. There are too many patients to offer good care. I have a complicated medical history; I would prefer to see the same doctor each time as it saves a huge amount of time not having to go over all the background again. Due to the number of people trying to access the surgery, this has not been possible for a long time.

WE3. Is this the right pool of potential development sites?

WE4. What land do you think is the most appropriate upon which to build?

I think land that is not green space should be prioritized, such as the land that is muddy and ugly by the Ham. However, areas such as the field on Bitham Park road, which are green areas should be left as long as possible.

WE5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?

Traffic is a huge issue, not just on the A350 but on other roads as well. I am a resident on Oldfield Road, and we have issues with traffic as the volume is very high. The speed bumps are the only way we can cross our road, knowing that a car going one way will block another, etc. We were promised a bridge over the field at the end of Mane Way years ago, but this has never been delivered, and the need is even higher with the new estate being built near the top of the road. (The bridge would also offer a safer way for children to get to school.) Come and talk to the residents on the roads around the sites; what do they think is needed? We can give a clear idea of what it is like to live on these roads and what we need.

WE6. Are there any issues or infrastructure requirements that should be identified?

The GP surgery was mentioned, but what about dentists? There was a scramble for places when the one at the surgery stopped taking NHS places.

Will there be more expansion of library services as well?

Further comments

People in Westbury are not happy. In the White Horse News dated 18/02/20, Westbury is described as "the forgotten town of Westbury". There have been these plans for an outdated waste plant facility which have been largely condemned. Wiltshire Council's motto is "Where everybody matters". The feeling I am getting is that Trowbridge, Chippenham and Melksham matter, and other towns such as Westbury are being ignored. Chippenham seems to be getting a second bypass before we even have our first. Our town is already full to bursting with a struggling surgery and high volumes of traffic, as well as air problems. Please, Wiltshire Council, prove that Wiltshire is the place where everybody does indeed matter, and not "where everybody matters" with the small print, except Westbury.

The council should look into helping Westbury and consolidating the already present community before building new houses.

Rep ID: WEST005	
Consultee code: General Public	Consultee Organisation (if applicable): Me
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below:
WE1. What do you think to the scale of growth? Should there be a brownfield target?	
What about shops?	
WE2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?	
Forget 'regenerating the town centre'. It's too small and thus will never be fit for purpose. Start compiling a list of sites for at least one retail park. I've seen your other document stating Westbury "can't compete" with other towns. Well of course Westbury can't compete without any decent shops/fast-food establishments! Get compiling!	

WE3. Is this the right pool of potential development sites?

Not without a retail park. Get compiling!

WE4. What land do you think is the most appropriate upon which to build?

All of it. Maybe we'll get a retail park when you've stuffed Westbury full of hungry people.

WE5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?

A RETAIL PARK.

WE6. Are there any issues or infrastructure requirements that should be identified?

A RETAIL PARK.

Further comments

GET US A RETAIL PARK.

Rep ID: WEST006

Consultee code: General Public

Consultee Organisation (if applicable):

Is this response on behalf of someone else/another organisation? No

Organisation being represented (if applicable):

Does this representation refer to attachment(s):
no

If this representation refers to attachment(s), these are listed below:

WE1. What do you think to the scale of growth? Should there be a brownfield target?

It is too high without significant concurrent investment in infrastructure - hard and soft (Green and Blue). Yes to brownfield.

WE2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?

An improved town centre is key otherwise Westbury will not have any secure identity whatever the levels of growth. It is already seen as a dumping ground, waste incinerator, traffic on the A350, speculative developments. That is not a positive image.

WE3. Is this the right pool of potential development sites?

The main growth is skewed to the south of Westbury rather than distributed according to landscape impact ie shielded from the areas of high landscape value. For instance extending area 6 so far south east and not further along the edge of the existing settlement boundary to the north east seems illogical and perverse. How could even the principle of developing such land be considered reasonable. Its inclusion undermines any confidence that the site selection process was correctly moderated. Why has Leighton House (east) been excluded.

WE4. What land do you think is the most appropriate upon which to build?

Low quality agricultural land immediately adjacent to existing settlement boundary, not existing woodland. How can the site selection process have included existing mature and developing woodland (Area 6) and be consistent with the Climate Change/Nature policies elsewhere in this consultation process. Its inclusion is contradictory and highlights the main purpose of the Local Plan is for finding land to develop rather than trying to strategically plan for and develop green infrastructure and nature recovery networks together and in the most appropriate locations. Until all three are given equal weight and considered with the same level of scrutiny and effort in the Local Plan process there will always be a preference towards development at the cost of the others two. In detail the land at the rear of Chalford Gardens up into the existing woodland should be protected as a key green infrastructure corridor.

WE5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?

Yes, there is too much emphasis on the hard development outcomes and not enough weight given to climate and nature in the site selection process. It is good that they are being considered but for this plan the risk is it is too little, too late. The profits to be made by securing a site for housing/employment still generate more pressure and investment by promoters to achieve this outcome when contrasting the protection or promotion of land for nature recovery or green infrastructure. Development will

therefore always win or be given more weight in what should be a process with an equality of consideration. Wiltshire Council should recognise this and takes steps to protect and promote key assets.

WE6. Are there any issues or infrastructure requirements that should be identified?

The G&B Infrastructure is too far behind in its development.

Further comments

Rep ID: WEST007

Consultee code: Parish/Town Council

Consultee Organisation (if applicable): Chapmanslade Parish Council

Is this response on behalf of someone else/another organisation? No

Organisation being represented (if applicable):

Does this representation refer to attachment(s):
yes

If this representation refers to attachment(s), these are listed below:
WEST007

WE1. What do you think to the scale of growth? Should there be a brownfield target?

The scale of growth for Westbury is high both historically and as planned. This has put incredible pressure on the A3098 west to Frome and particularly in Chapmanslade. Traffic volume and speed have increased and congestion around the village centre is a growing problem. Pedestrians and cyclists are experiencing increasingly dangerous situations. If the plan for Westbury is to continue this growth, then part of that plan must include measures to mitigate the effects of the additional traffic and upgrade the pavements and areas of the A3098 that are below standard. Frome and its planned growth must also not be ignored in assessing these effects.

WE2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?

Yes we generally agree these are the right priorities In particular we are encouraged to see sustainable transport links are to be extended to surrounding parishes

WE3. Is this the right pool of potential development sites?

WE4. What land do you think is the most appropriate upon which to build?

WE5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?

If sites are built on the outskirts of towns or in outlying villages without proper consideration for the travel requirements of the future inhabitants of those sites, then there will be a negative environmental impact from increased road usage and the associated increase in carbon emissions and road particulate pollution.

WE6. Are there any issues or infrastructure requirements that should be identified?

Transport

Overview required for planned active travel routes between settlements. Westbury has an important railway station that will be important in achieving low carbon travel solutions. There should be strategic off road active travel routes connecting this station to settlements around Westbury.

Further comments

Our overall view is that housing planning cannot be disconnected from schemes to reduce climate change. In Chapmanslade's case considerations must be made to how much traffic will increase with increased building, especially to the west of Westbury. A fundamental update of the Town and Planning Act is required to make Climate Action Plans etc. workable by making climate impact a key factor of every planning application. Additionally, future and existing sites need a new infrastructure of connections that encourage active and sustainable transport such as cycling and walking, with vehicular traffic being increasingly reduced in access to routes that pass through residential areas.

Rep ID: WEST008	
Consultee code: Other Advisory Bodies	Consultee Organisation (if applicable): Sport England
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below:
WE1. What do you think to the scale of growth? Should there be a brownfield target?	
No comment	
WE2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?	
Creation of a healthy, inclusive sustainable town. this can be done in part through the use of 'Sport England and Public Health England' Active Design: https://www.sportengland.org/how-we-can-help/facilities-and-planning/design-and-cost-guidance/active-design when designing new housing and in environmental improvements	

WE3. Is this the right pool of potential development sites?

I am concerned about site 11 - this is playing field and it should not be built on unless there is a proposed replacement or shown to be surplus to requirements as per para 97 NPPF. Without this Sport England would object to the allocation.

WE4. What land do you think is the most appropriate upon which to build?

Non- playing field or sports land

WE5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?

See above

WE6. Are there any issues or infrastructure requirements that should be identified?

No

Further comments

No

Rep ID: WEST009	
Consultee code: General Public	Consultee Organisation (if applicable):
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below:
WE1. What do you think to the scale of growth? Should there be a brownfield target?	
Westbury has already undergone substantial housing development in the past 15 years without the corresponding upgrade in infrastructure. Any further growth should be confined to the existing brownfield sites.	
WE2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?	
Yes, these are the right priorities, but sadly overlooked in recent planning permissions. Infrastructure has been overlooked, particularly the failure to build a by-pass to relieve the already overloaded A350 which is pertinent to paras 2 , 3 and 4 above.	
WE3. Is this the right pool of potential development sites?	

No. The map shows the majority of development sites are outside the existing town boundaries and encroaching on to agricultural land. In particular sites 6 and 7 are totally inappropriate. The Wellhead Valley (6) needs to be preserved as a special rural landscape area with it's access to the Salisbury Plain escarpment and the Westbury White Horse. The site described as "Turnpike Field" (7) is already subject to considerable local opposition as again this is agricultural land, outside the town boundary and accessed only by forcing through the existing Leighton Park Road estate whose roads are totally inadequate to cope with plant and machinery and the additional traffic the site would generate. Further problems would be created by the developer's plan to link their drains to the already problematic road drains.

WE4. What land do you think is the most appropriate upon which to build?

If I had to choose one of the larger sites, then reluctantly this would be the land west of Mane Way (10). This is again agricultural land, but from a development view point offers a level site with easy access directly from Mane Way and therefore does not have any adverse impact on existing homes and families.

WE5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?

Ideally, there should be no further development in Westbury before the appropriate infrastructures ie schools, doctors, dentists and a comprehensive road scheme, to include a by-pass are put in place.

WE6. Are there any issues or infrastructure requirements that should be identified?

Please see answer to question 11.

Further comments

I trust my comments will help you make the right decisions when considering future housing developments and their impact on families already living in Westbury.

Rep ID: WEST010

Consultee code: Other

Consultee Organisation (if applicable): Westbury Leigh Primary School

Is this response on behalf of someone else/another organisation? No

Organisation being represented (if applicable):

Does this representation refer to attachment(s):
no

If this representation refers to attachment(s), these are listed below:

WE1. What do you think to the scale of growth? Should there be a brownfield target?

WE2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?

WE3. Is this the right pool of potential development sites?

WE4. What land do you think is the most appropriate upon which to build?

WE5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?

WE6. Are there any issues or infrastructure requirements that should be identified?

Further comments

I have viewed the development plans for Westbury and want to make you aware that all of the development is sitting to one side of the town; this means that schools on that side of the town are becoming fuller and expanding to the detriment of schools such as ours who are declining in numbers. As part of the development plan, there needs to be a refocus on catchment areas and filling school places that already exist before creating new ones.

Rep ID: WEST011	
Consultee code: Parish/Town Council	Consultee Organisation (if applicable): Westbury Town Council
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): yes	If this representation refers to attachment(s), these are listed below: WEST011
WE1. What do you think to the scale of growth? Should there be a brownfield target?	
<p>Westbury Town Council Supporting Sustainable Growth for Westbury Work undertaken in production of Westbury's Vision and NOP, together with strategic planning and transportation related studies, provide an evidence base that has informed the following comments. Consistent with paragraph 13 of the NPPF, Westbury Town Council aims to work with Wiltshire Council to help it shape strategic policies for Westbury and to produce neighbourhood plan policies that seek to support their delivery at the local level. This feedback provides Wiltshire Council with additional evidence.</p> <p>Westbury Local Plan Settlement Boundary and Town Council Response Westbury Town Council administrative area covers a substantial part of, but not all of the Local Plan defined Westbury urban area. The majority of Westbury's primary employment area, and sites 1 and 2 put in the proposed "pool" of potential sites for allocation, lie within Heywood Parish. Comments made by Westbury Town Council relate to emerging priorities, policies and the pool of potential allocation sites for the Westbury settlement as defined in the Local Plan. These may relate to areas, sites and</p>	

issues on land within adjoining parishes and the wider area affecting Westbury. The comments made by Westbury Town Council do not represent the views of other parishes and have not been the subject of consultation with them.

A350 Congestion and Air Quality Management

The ability to breathe clean air and air that is not harmful to health is assumed to be a fundamental right. Local authorities have to designate an air quality management area (AQMA) where the prescribed Air Quality Objectives are not likely to be met by or at any point beyond the relevant deadline. Wiltshire Council has currently identified Westbury as one of eight specific locations where air quality is of concern and AQMAs have been declared. Westbury is one. Through traffic on the A350 is a primary cause of the concerning level of air pollution that has resulted in the designation of Westbury's Air Quality Management Area effective 26/11/2001. There is currently no action plan. Place shaping priority IV within the draft planning strategy for Westbury states, "Development should contribute towards the improvement of air quality and support the Air quality Management Area (AQMA) in Westbury town centre "Wiltshire Local Plan Transport Review (Atkins, January 2021) identifies the likelihood of increased congestion on the A350 through Westbury as a result of planned strategic growth. The review proposes recognised issues in Westbury should be addressed through a separate "comprehensive strategy". However there is no timescale suggested for such a strategy and no funding programme in place. Such predicted congestion increases in Westbury are in conflict with Placeshaping principle IV and Westbury Town Council's identified additional principle relating to community health and wellbeing. Sustainable Transport and Linkages.

Delivery of a successful and attractive walking and cycling network within Westbury linking homes to the town centre, employment and potential areas of strategic or large-scale housing growth is at the heart of the place shaping priority at Para 21 item ii. "Development should contribute towards sustainable transport links (particularly walking and cycling routes) within the town and to the surrounding parishes and between the railway station and town centre" Heavy traffic flows on the A350 route within Westbury are likely to impact on perceptions of walking and cycling health risks and safety within the town. Without the delivery of measures to address through traffic flows, remove severance and create capacity for safe and attractive sustainable transport options, it is more likely that new residents of potential growth areas will use cars to make short journeys within Westbury, exacerbating the existing levels and impacts of congestion.

Town Centre Recovery and Regeneration

Like most towns across the country, Westbury town centre has suffered from changes in shopping patterns and now the impacts of COVID 19. However, Westbury town centre's attractiveness is also adversely affected by the volume of through traffic on the A350. Local Plan Review place shaping priority iii recognises the shared ambition to support the recovery and re-vitalisation of Westbury town centre. "Develop a strategy for the regeneration of the town centre taking into consideration the emerging Westbury Town Plan, to encourage spending, improve accessibility, better manage traffic and parking and

safeguard heritage assets". The NDP should take a leading role in this.

The addition of new residents to Westbury's community brings with it the potential to strengthen the role of the town centre as a revitalised community hub. However, consultation feedback for the Town Centre Vision identified the impact and danger of heavy through traffic, including HGVs as a primary detractor. Without addressing this issue as an integral part of Wiltshire's and Westbury's growth strategy, the potential of the Town Centre Vision and place shaping priority iii to realise its potential may be severely diminished.

Coordinated and committed delivery of transport investments on the A350 at Westbury and at Oldfield Road must be clarified before Westbury Town Council can provide any robust comment on the proposed amount of growth in Wiltshire, across the Trowbridge HMA and at Westbury.

But without such a coordinated package, and with such identified conflicts, the Town Council currently expresses severe concern and may be unable to support levels of growth that contribute to worsening air quality and congestion at Westbury and fail to contribute to delivery of its stated place making priorities.

Affordable Housing Needs Delivery

Westbury Neighbourhood Plan Steering Group has commissioned a technical assessment of Westbury's distinct housing needs. It has also undertaken a local call for potential sites to be allocated for development by the NDP and commissioned a Locality consultant technical appraisal of these sites. This provides the Town Council with evidence that has been used in making comments. These reports are available to Wiltshire Council to enable coordination of the sites assessment and potential allocation of land in either plan.

Westbury's Housing Needs Assessment has identified a significant pent-up need for affordable housing in a range of types and tenures. This figure cannot be met within the current residual growth figure identified for Westbury. The Town Council wishes to continue dialogue with Wiltshire Council to identify the optimum sustainable amount and typology of housing to be allocated and delivered at Westbury to meet local and strategic needs.

Consistent with Westbury's Local Plan classification (Emerging Spatial Strategy page 3) as a market town (Wiltshire Core Strategy: Core Policy 1 – Settlement Strategy), the Town Council would expect housing delivery at Westbury to be specified through any allocation policies to maximise its responsiveness to Westbury's distinct housing needs as identified in the 2021 AECOM Housing Needs Assessment.

Through coordinated development and adoption/making of the Local and Neighbourhood Plans, Westbury Town Council would wish the neighbourhood plan to:

- Be responsible for potential smaller brownfield and/or greenfield sites
- Allocate to meeting local housing and employment needs, delivering local community benefits.
- Set place shaping principles and master planning codes that will be associated with the delivery of any strategic and larger sites allocated by the Local Plan.

Answer to second part of question 1:

Should there be a brownfield target? Should it be higher or lower?

Brownfield Availability at Westbury

For purposes of this response, Brownfield (also known as previously developed land) is as defined as in Annex 2 of the NPPF 2019, as “Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure. This excludes: land that is or was last occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill, where provision for restoration has been made through development management procedures; land in built-up areas such as residential gardens, parks, recreation grounds and allotments; and land that was previously developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape.”

There are currently three known available brownfield sites within the Neighbourhood Plan Area (which accords with the Town Council Administrative area:

One site identified in the local call for sites:

- Site WNP6 – Elkins Ford BA13 3SB (The site is considered to be potentially suitable for 9 dwellings)

Two sites identified in the Wiltshire Brownfield Land Register Part 1 2019:

- Westbury Leigh Baptist Church (5 Sites with planning permission as at 31 March 2019)
- North Junction, Station Road, Westbury (102 with planning permission as at 31 March 2019)

We also refer here to the response to question WE2, which references potential opportunities for development identified by the Westbury Town Centre Vision. However, these do not necessarily represent sites that are currently or likely to be available for development within the NDP or extended Local Plan period.

In principle the Town Council would be likely to support brownfield development that makes a positive contribution to delivery of the Westbury Town Centre Vision and the made

Neighbourhood Plan. As such it does not object to a brownfield land delivery target that is extrapolated from the trajectory of previous years' planning consents within the town. However, it should be noted that these previous figures and future brownfield housing may also relate to land within Heywood Parish, which will make its own response.

Role of the Neighbourhood Plan

Westbury Neighbourhood Plan may contain policies that promote and support planning applications that deliver regeneration and sustainable and appropriate development of brownfield sites within Westbury NDP area. This is likely to support the Local Plan and ongoing delivery of brownfield development on infill and windfall sites at the current ambient rate.

The Town Council see the Westbury Neighbourhood Plan as the primary development plan document to support the delivery of the town centre's regeneration and recovery from the impacts of COVID 19.

Westbury Town Centre Vision has set out an ambitious and proactive agenda which is a key piece of evidence distinct to Westbury. The Neighbourhood Plan will provide a suite of local policies and projects that support and facilitate the delivery of its development initiatives and project that are considered feasible within the lifetime of the plan.

The Town Council will seek to strengthen its partnership with Wiltshire Council to provide strategic Local Plan policies and coordinated infrastructure delivery that will underpin and support regeneration of the town centre.

WE2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?

To inform this response, the Town Council provides a schedule and commentary of the place shaping priorities known to the council and NDP Steering Group. These have been as a result of recent stakeholder community consultation and technical work undertaken during the drafting of the Westbury Town Centre Vision and evidence gathering to support the emerging Westbury Neighbourhood Plan.

This schedule firstly addresses a review of priorities identified by the Planning for Westbury document. It then itemises and expands upon other place shaping priorities identified through work undertaken in building the NDP evidence base.

Delivery

In response to WE1, the Town Council has highlighted the need for coordinated delivery of A350 related highway infrastructure measures at Westbury. It sees this being of primary importance to delivery of Westbury's place shaping priorities and one that is the responsibility of Wiltshire Council, through its planning and transportation plans and programmes.

As stated in response to WE 1 and WE2, the Town Council sees Westbury NDP playing a lead role in providing local policies that will support and enable delivery of Westbury's town centre vision and local place shaping priorities, including guiding and coding to deliver high quality design within potential areas of growth.

Wiltshire's Place shaping priorities

i. High quality design should draw on Westbury's local heritage and sense of place to deliver well designed homes and places that reinforce the positive characteristics and qualities of the town and respond sensitively to the surrounding landscape and connect into existing neighbourhoods and town centre.

The delivery of infrastructure to support new homes is a key local concern.

The desirable infrastructure items, of importance to the town include:

- Crossing of the railway line, to both alleviate traffic from Oldfield Road and provide a connection to Mane Way, the principal distributor road around Leigh Park, and to ensure direct and sustainable links for the community of the new housing area (core strategy strategic site (H14), land off Station Road, Westbury)
- Improvements to enable more cyclist and pedestrian use of Station Road to deliver a connected sustainable transport network
- Safer routes for pedestrians and other cycle links away from the A350
- Re-provision of any sports pitches or other leisure facilities where triggered by development.
- Town centre public realm improvements
- Additional health provision
- Smarter Choices Measures, including measures such as:
 - o Travel Plans – new development to be required to contribute to improvements identified by School Travel Plans
 - o Encouraging car sharing e.g. via car clubs Working from Home

ii. Agreed. Westbury has the potential to be a very cycle and pedestrian friendly town due to its accessible size and predominantly quiet roads. This is with the exception of both the busy A350 and the A3098 that run through the town centre dissecting safe routes, and are not considered cycle or pedestrian friendly due to the high levels of traffic and constrained space which leaves little room for road users other than vehicular traffic.

As set out in the Core Strategy, the delivery of strategic housing growth at Station Road, Westbury (former West Wiltshire housing allocation - H14) was allocated with the benefits of “providing an enhanced gateway to the town, in addition to providing a new crossing of the railway line, thus alleviating traffic from Oldfield Road and providing a connection to Mane Way”. The delivery of this crossing remains an important element in the local sustainable transport network that will significantly improve the access to the station from the south and west of the town and will help to reduce pressure on Station Road.

Station Road linking the town centre to the station and beyond to the West Wilts Trading Estate provides opportunity to create a sustainable transport corridor for walking, cycling, public transport and vehicular movement connecting these significant areas. The Core Strategy also highlighted that strategic development around Westbury railway station should also deliver improved access, particularly for buses, with improved and integrated public transport connectivity; quality pedestrian and cycle linkages.

Recent government publications³ signal a clear intention to increase the numbers of walking and cycling routes, and that routes are well connected with wider public transport options. Station Road is a key routeway in Westbury’s sustainable transport network and an improved routeway is an element of the Town’s place shaping priorities.

iii. Please amend to “taking into consideration the emerging Westbury Town Plan Centre Vision, and Neighbourhood Plan” The Neighbourhood Plan will include a policy for the town centre that links to the Town Centre Vision to support and enable regeneration of the Town Centre which would also include public realm enhancements, and possible development sites.

iv. A Bypass is a key local issue. There is concern about the impact of increased housing in Wiltshire on the traffic and related issues along the route of the A350. The Local Transport Plan Review (January 2021) forecasts Increased congestion on the A350: “through Westbury and onwards towards Warminster. Interventions have not, to date, been identified for these sections (apart from the Yarnbrook to West Ashton Bypass). It is recommended that a comprehensive strategy should be considered to assess the longer-term issues and options for the route.”

In 4.4.1 in the summary of the same document it states that further investigation is required to develop appropriate mitigation measures in Westbury (the location of preferred option housing will require further consideration of how this will impact on the local network).

Another important factor in addressing traffic issues in the town is considered to be the delivery of the new crossing of the railway line to alleviating traffic from Oldfield Road and providing a connection to Mane Way.

Better pedestrian and cycling routes within Westbury and on to nearby villages and market towns would also address traffic issues.

v. Agreed that providing open spaces in new development that adds to existing network of multifunctional green spaces in Westbury is a priority. There is a deficit of some types of open space in Westbury (in particular allotment sites). Open Space standards and current provision in the town should inform both the typology and location of new open spaces. Open Spaces and connections between them should support physical activity and healthy lifestyles across all ages and abilities. Walking and Cycling has multi benefits from the contribution to lowering carbon emissions to the positive impact on health and wellbeing. Open Spaces and connections between them should support physical activity and healthy lifestyles across all ages and abilities.

The need for a new crossing of the railway line, to alleviate traffic from Oldfield Road and provide a connection to Mane Way and will also deliver safe, direct and sustainable links for the community of the new housing area to the rest of Westbury.

vi. There is a need to for Westbury to look at the challenges and opportunities for employment and new models of working. Whilst the industrial capacity of the West Wiltshire Trading Estate should be rightly protected as employment space, the site of the former Westbury Ironworks, immediately adjacent to the station is presently occupied at a relatively low density and could provide a new opportunity to create a mixed use residential and employment district. The intensification of employment uses to provide a more diverse and mixed use area with co-working spaces and community uses such as a dance school is a possibility that has been raised in the Westbury Town Centre Vision and is one that the Neighbourhood Plan will explore. This area of approximately 15 hectares of land immediately around the station could potentially be zoned for gradual change and intensification through planning policy in the Neighbourhood Plan.

Development of land in a compact and sustainable way around a significant transport interchange and supplemented by good walking and cycling links to the town centre would provide a strong case for the intensification of low density industrial area and would generate more housing with less traffic on local streets than other edge of town developments.

Other priorities

Development should be sensitive to Westbury's heritage and identity and draw on locally distinctive positive characteristics to contribute to place-shaping.

Along with the designated assets and the Conservation Area, Westbury has a number of non-designated heritage assets and distinct areas of heritage value such as Westbury Leigh and Leighton House which form part of the heritage and identity of Westbury.

Protect the town's high-quality landscape setting notably to the South East.

Much the land outside the built-up area immediately east of the town, south of the A3095 (Bratton Road) and east of the A350 (Warminster Road) falls within the Salisbury Plain Special Landscape Area as designated in the saved policy of the West Wiltshire Local Plan.

This area is particularly susceptible to the expansion of Westbury, which would be visible from the higher ground to the east. The West Wiltshire Landscape Character Assessment recommends that development which would affect the views across the chalk terrace is resisted, that open views to the Westbury White Horse are maintained, and that larger developments which may disrupt the sparse settlement pattern are avoided.

To retain and improve the vital range of facilities and services that support the health and wellbeing of the local population in line with current and future needs

Community facilities such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship are important elements of what make Westbury a good place to live and should be positively planned for. An arts centre is something set out in the Town Centre Vision document and would also contribute to local wellbeing and cultural identity

WE3. Is this the right pool of potential development sites?

Brownfield Availability at Westbury

For purposes of this response, Brownfield (also known as previously developed land) is as defined as in Annex 2 of the NPPF 20191 , as "Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure. This excludes: land that is or was last occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill, where provision for restoration has been made through development management procedures; land in built-up areas such as residential gardens, parks, recreation grounds and allotments; and land that was previously developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape."

There are currently three known available brownfield sites within the Neighbourhood Plan Area (which accords with the Town Council Administrative area:

One site identified in the local call for sites:

Site WNP6 - Elkins Ford BA 13 3SB (The site is considered to be potentially suitable for 9 dwellings)

wo sites identified in the Wiltshire Brownfield Land Register Part 1 20192: • Westbury Leigh Baptist Church (5 Sites with planning permission as at 31 March 2019)

• North Junction, Station Road, Westbury (102 with planning permission as at 31 March 2019)

We also refer here to the response to question WE2, which references potential opportunities for development identified by the Westbury Town Centre Vision. However, these do not necessarily represent sites that are currently or likely to be available for development within the NOP or extended Local Plan period.

In principle the Town Council would be likely to support brownfield development that makes a positive contribution to delivery of the Westbury Town Centre Vision and the made Neighbourhood Plan. As such it does not object to a brownfield land delivery target that is extrapolated from the trajectory of previous years' planning consents within the town. However, it should be noted that these previous figures and future brownfield housing may also relate to land within Heywood Parish, which will make its own response.

Role of the Neighbourhood Plan

Westbury Neighbourhood Plan may contain policies that promote and support planning applications that deliver regeneration and sustainable and appropriate development of brownfield sites within Westbury NOP area. This is likely to support the Local Plan and ongoing delivery of brownfield development on infill and windfall sites at the current ambient rate.

The Town Council see the Westbury Neighbourhood Plan as the primary development plan document to support the delivery of the town centre's regeneration and recovery from the impacts of COVID 19. Westbury Town Centre Vision has set out an ambitious and proactive agenda which is a key piece of evidence distinct to Westbury. The Neighbourhood Plan will provide a suite of local policies and projects that support and facilitate the delivery of its development initiatives and project that are considered feasible within the lifetime of the plan.

The Town Council will seek to strengthen its partnership with Wiltshire Council to provide strategic Local Plan policies and coordinated infrastructure delivery that will underpin and support regeneration of the town centre.

WE4. What land do you think is the most appropriate upon which to build?

To inform this response, the Town Council provides a schedule and commentary of the place shaping priorities known to the council and NOP Steering Group. These have been as a result of recent stakeholder community consultation and technical work undertaken during the drafting of the Westbury Town Centre Vision and evidence gathering to support the emerging Westbury Neighbourhood Plan. This schedule firstly addresses a review of priorities identified by the Planning for Westbury document. It then itemises and expands upon other place shaping priorities identified through work undertaken in building the NOP evidence base. Delivery

In response to WE1, the Town Council has highlighted the need for coordinated delivery of A350 related highway infrastructure measures at Westbury. It sees this being of primary importance to delivery of Westbury's place shaping priorities and one that is the responsibility of Wiltshire Council, through its planning and transportation plans and programmes. As stated in response to WE 1 and WE2, the Town Council sees Westbury NOP playing a lead role in providing local policies that will support and enable delivery of Westbury's town centre vision and local place shaping priorities, including guiding and coding to deliver high quality design within potential areas of growth. High quality design should draw on Westbury's local heritage and sense of place to deliver well designed homes and places that that reinforce the positive characteristics and qualities of the town and respond sensitively to the surrounding landscape and connect into existing neighbourhoods and town centre. The delivery of infrastructure to support new homes is a key local concern. The desirable infrastructure items, of importance to the town include: Crossing of the railway line, to both alleviate traffic from Oldfield Road and provide a connection to Mane Way, the principal distributor road around Leigh Park, and to ensure direct and sustainable links for the community of the new housing area (core strategy strategic site (H14), land off Station Road, Westbury) Improvements to enable more cyclist and pedestrian use of Station Road to deliver a connected sustainable transport network Safer routes for pedestrians and other cycle links away from the A350 Re-provision of any sports pitches or other leisure facilities where triggered by development. Town centre public realm improvements Additional health provision Smarter Choices Measures, including measures such as: Travel Plans - new development to be required to contribute to improvements identified by School Travel Plans Encouraging car sharing e.g. via car clubs Working from Home Agreed. Westbury has the potential to be a very cycle and pedestrian friendly town due to its accessible size and predominantly quiet roads. This is with the exception of both the busy A350 and the A3098 that run through the town centre dissecting safe routes, and are not considered cycle or pedestrian friendly due to the high levels of traffic and constrained space which leaves little room for road users other than vehicular traffic. As set out in the Core Strategy, the delivery of strategic housing growth at Station Road, Westbury (former West Wiltshire housing allocation - H14) was allocated with the benefits of "providing an enhanced gateway to the town, in addition to providing a new crossing of the railway line, thus alleviating traffic from Oldfield Road and providing a connection to Mane Way". The delivery of this crossing remains an important element in the local sustainable transport network that will significantly improve the access to the station from the south and west of the town and will help to reduce pressure on Station Road. Station Road linking the town centre to the station and beyond to the West Wilts Trading Estate provides opportunity to create a sustainable transport corridor for walking, cycling, public transport and vehicular movement connecting these significant areas.

WE5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?

The Core Strategy also highlighted that strategic development around Westbury railway station should also deliver improved access, particularly for buses, with improved and integrated public transport connectivity; quality pedestrian and cycle linkages. Recent government publications³ signal a clear intention to increase the numbers of walking and cycling routes, and that routes are well connected with wider public transport options. Station Road is a key routeway in Westbury's sustainable transport network and an improved routeway is an element of the Town's place shaping priorities. Please amend to "taking into consideration the emerging Westbury Town Centre Vision, and Neighbourhood Plan" The Neighbourhood Plan will include a policy for the town centre that links to the Town Centre Vision to support and enable regeneration of the Town Centre which would also include public realm enhancements, and possible development sites. A Bypass is a key local issue. There is concern about the impact of increased housing in Wiltshire on the traffic and related issues along the route of the A350. The Local Transport Plan Review (January 2021) forecasts Increased congestion on the A350: "through Westbury and onwards towards Warminster. Interventions have not, to date, been identified for these sections (apart from the Yambrook to West Ashton Bypass). It is recommended that a comprehensive strategy should be considered to assess the longer-term issues and options for the route." In 4.4.1 in the summary of the same document it states that further investigation is required to develop appropriate mitigation measures in Westbury (the location of preferred option housing will require further consideration of how this will impact on the local network). Another important factor in addressing traffic issues in the town is considered to be the delivery of the new crossing of the railway line to alleviating traffic from Oldfield Road and providing a connection to Mane Way. Better pedestrian and cycling routes within Westbury and on to nearby villages and market towns would also address traffic issues. Agreed that providing open spaces in new development that adds to existing network of multifunctional green spaces in Westbury is a priority. There is a deficit of some types of open space in Westbury (in particular, allotment sites). Open Space standards and current provision in the town should inform both the typology and location of new open spaces. Open Spaces and connections between them should support physical activity and healthy lifestyles across all ages and abilities. Walking and Cycling has multi benefits from the contribution to lowering carbon emissions to the positive impact on health and wellbeing. Open Spaces and connections between them should support physical activity and healthy lifestyles across all ages and abilities. The need for a new crossing of the railway line, to alleviate traffic from Oldfield Road and provide a connection to Mane Way and will also deliver safe, direct and sustainable links for the community of the new housing area to the rest of Westbury. There is a need to for Westbury to look at the challenges and opportunities for employment and new models of working.

Whilst the industrial capacity of the West Wiltshire Trading Estate should be rightly protected as employment space, the site of the former Westbury Ironworks, immediately adjacent to the station is presently occupied at a relatively low density and could provide a new opportunity to create a mixed use residential and employment district. The intensification of employment uses to provide a more diverse and mixed use area with co-working spaces and community uses such as a dance school is a possibility that has been raised in the Westbury Town Centre Vision and is one that the Neighbourhood Plan will explore.

WE6. Are there any issues or infrastructure requirements that should be identified?

This area of approximately 15 hectares of land immediately around the station could potentially be zoned for gradual change and intensification through planning policy in the Neighbourhood Plan.

Development of land in a compact and sustainable way around a significant transport interchange and supplemented by good walking and cycling links to the town centre would provide a strong case for the intensification of low density industrial area and would generate more housing with less traffic on local streets than other edge of town developments. Along with the designated assets and the Conservation Area, Westbury has a number of non-designated heritage assets and distinct areas of heritage value such as Westbury Leigh and Leighton House which form part of the heritage and identity of Westbury. Much the land outside the built-up area immediately east of the town, south of the A3095 (Bratton Road) and east of the A350 (Warminster Road) falls within the Salisbury Plain Special Landscape Area as designated in the saved policy of the West Wiltshire Local Plan. This area is particularly susceptible to the expansion of Westbury, which would be visible from the higher ground to the east. The West Wiltshire Landscape Character Assessment recommends that development which would affect the views across the chalk terrace is resisted, that open views to the Westbury White Horse are maintained, and that larger developments which may disrupt the sparse settlement pattern are avoided. Community facilities such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship are important elements of what make Westbury a good place to live and should be positively planned for. An arts centre is something set out in the Town Centre Vision document and would also contribute to local wellbeing and cultural identity.

Please see Annex A - this is a document comparing the Wiltshire Council pool of sites with the Westbury Neighbourhood Plan Sites. Our responses are informed by an AECOM Site Assessment (January 2021) which assess sites from both the Wiltshire SHEELA and from a local call for sites in spring 2020.

Westbury Town Council is currently preparing a Neighbourhood Plan. As part of this, the NDP Steering Group is exploring the opportunities to allocate land for development to meet local needs. It has undertaken a local call for sites and secured technical support from Locality to commission:

- (I) Initial AECOM appraisal of all potential allocation sites
- (II) AECOM Housing Needs Appraisal

Both assessments have been validated by the NDP Steering group.

To contribute to and support The Town Council's response to questions WE1, WE3, WE4 and WES the Neighbourhood Plan Steering Group has prepared a commentary table on the Wiltshire Local Plan Review draft pool of sites. This is provided as Annex A to this response form.

This provides Wiltshire Council with:

- The AECOM assessment conclusions of sites put forward within Westbury NDP area, which would inform next stages in considering site allocations within the NOP.

- A cross-referenced schedule of assessment findings and suitability conclusions between those from the Wiltshire Council assessment and AECOM's assessment.

- Additional information of sustainable development factors AECOM considered material in reaching its view. Identification of those potential sites within Westbury NOP area that both Wiltshire Council and AECOM considered potentially suitable for progression to the next sustainability appraisal stages in the allocation process. This does not conclude whether sites should or should not be progressed through the Local Plan Review of the NDP.

Further comments

Annex A provides Wiltshire Council with commentary on the outcome of technical assessments undertaken by the Local Plan Review process and the NOP sites assessment process within Westbury NOP area. This has indicated sites that both Wiltshire Council and AECOM considered potentially suitable for progression to the next sustainability appraisal stages in the allocation process as well as where there are conflicting results.

This does not take account of any further consideration of sites located within Heywood Parish, which are considered only by Wiltshire Council assessment.

Results of the AECOM assessment have not been subjected to any landowner or community consultation at this stage and cannot therefore be considered to represent the Town Council's view on preferred sites.

Commentary does not conclude whether sites should or should not be progressed through the Local Plan Review of the NDP. Westbury Town Council looks forward to constructive dialogue with Wiltshire Council in resolving a coordinated approach to large scale and local sites allocation within the next stages of Local Plan and NOP drafting. Please see Annex A - this is a document comparing the Wiltshire Council pool of sites with the Westbury Neighbourhood Plan Sites. Our responses are informed by an AECOM Site Assessment (January 2021) which assess sites from both the Wiltshire SHEELA and from a local call for sites in spring 2020.

Annex A provides Wiltshire council with additional information regarding sustainable development factors that AECOM considered material in reaching its conclusions and recommendations. This does not consider sites outside of Westbury NDP area.

Reference should also be made to the town council's response to question WE2, which provides further detailed commentary on distinct place shaping priorities that are material to all potential sites. Through early engagement and the evidence building stage of progressing the Westbury Neighbourhood Plan, and the production of the Town Centre Vision the NOP Steering Group is assembling evidence of community issues and need, including infrastructure to support NOP policy and project development. In response to question WE 6 the Town Council has provided a schedule of additional infrastructure requirements alongside those identified, by topic, by Wiltshire Council. This is set out within the table below.

[See attachment WEST011]

Rep ID: WEST012

Consultee code: General Public

Consultee Organisation (if applicable):

Is this response on behalf of someone else/another organisation? No

Organisation being represented (if applicable):

Does this representation refer to attachment(s):
no

If this representation refers to attachment(s), these are listed below:

WE1. What do you think to the scale of growth? Should there be a brownfield target?

The scale of growth is excessive and needs to be reduced. There is no point in continued housing development if there isn't the road, school and general infrastructure available to support this growth.

WE2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?

WE3. Is this the right pool of potential development sites?

WE4. What land do you think is the most appropriate upon which to build?

Site 1: Land North of Shallow Waggon Lane (SHELAA site 3445)

WE5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?

Site 9 (Land at Leigh Park - SHELAA site 268) and Site 10 (Land to the west of Mane Way - SHELAA site 3205) would appear to encroach too much into the so-called Rural Buffer Zone intended to protect Dilton Marsh from coalescence with Westbury.

WE6. Are there any issues or infrastructure requirements that should be identified?

Where to start? Employment, shopping, schools, surgeries, libraries ...

Further comments

Rep ID: WEST013

Consultee code: Statutory Body

Consultee Organisation (if applicable): Wessex Water

Is this response on behalf of someone else/another organisation? No

Organisation being represented (if applicable):

Does this representation refer to attachment(s):
no

If this representation refers to attachment(s), these are listed below:

WE1. What do you think to the scale of growth? Should there be a brownfield target?

Where developing on brownfield sites opportunities must be realised to redirect surface water from the foul water networks and limit the surface water flows from site using multi benefit SuDS schemes.

WE2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?

WE3. Is this the right pool of potential development sites?

Site 1: Land North of Shallow Waggon Lane (SHELAA site 3445), Site 2: Glenmore Farm (SHELAA sites 1014, 742, 883 & 375), Site 3: Land at Slag Lane (SHELAA site 3218), Site 4: Land to the West of Coach Road (SHELAA site 3620) and Site 5: Land at Fairdown and East of Newtown, Westbury (SHELAA sites 272 & 3170)

Development proposed at Westbury is significant. Significant appraisal will be required to consider solutions and how best to direct investment for growth. Significant improvements are likely to generate works close to the railway requiring substantial planning and lead in times.

Site 6: Land rear of Leighton Recreation Centre (SHELAA sites 1011 & 251)

Development proposed at Westbury is significant. Significant appraisal will be required to consider solutions and how best to direct investment for growth. Significant improvements are likely to generate works close to the railway requiring substantial planning and lead in times.

The site is within the drinking water source protection zone of Wellhead Springs. Wessex Water will object to development where it poses risk to drinking water quality.

Site 7: Turnpike Field, Old Dilton Lane (SHELAA sites 3375, 3337 & 622)

The proposal is within the drinking water source protection zone for Wellhead Springs. Wessex Water will object to development which increases the risk of harm to drinking water sources. Development proposed at Westbury is significant. Significant appraisal will be required to consider solutions and how best to direct investment for growth. Significant improvements are likely to generate works close to the railway requiring substantial planning and lead in times.

Site 8: Land to the rear of 71 Westbury Leigh (SHELAA site 3223), Site 9: Land at Leigh Park (southern parcel) (SHELAA site 268), Site 10: Land to the west of Mane Way (SHELAA site 3205), Site 11: Land at Redland Lane (SHEAA site 269) and Site 12: Land at Gas House Farm (SHELAA site 299)

Development proposed at Westbury is significant. Significant appraisal will be required to consider solutions and how best to direct investment for growth. Significant improvements are likely to generate works close to the railway requiring substantial planning and lead in times.

WE4. What land do you think is the most appropriate upon which to build?

Please see comments under WE3.

WE5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?

Please see comments under WE3.

WE6. Are there any issues or infrastructure requirements that should be identified?

Please see comments under WE3.

Further comments

Rep ID: WEST014

Consultee code: General Public

Consultee Organisation (if applicable):

Is this response on behalf of someone else/another organisation? No

Organisation being represented (if applicable):

Does this representation refer to attachment(s):
no

If this representation refers to attachment(s), these are listed below:

WE1. What do you think to the scale of growth? Should there be a brownfield target?

The scale of growth is far too high. The problem is that the infrastructure needs to be improved before there is any further development. In the last few years there must have been at least another 1000 houses built or being built in and around Westbury, but precious little has been done with the town's infrastructure.
As stated above, brownfield sites should be used in preference to greenfield.

WE2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?

We agree that these are the key priorities; 4. is the most important for Westbury. Addressing climate change and net biodiversity gain are cited as key issues in the documentation, but are not specifically mentioned as priorities. These should be integral to any shaping policies.

With reference to priority 4, housing development will further damage air quality due to increased building and traffic congestion. We believe that the priority should be to address the problems with the A350 through the town centre before any further developments are undertaken. Other priorities can then be considered once funding for a bypass is granted and a route decided. We agree that any future houses should be well designed in terms of heating efficiency with air or ground source heat pumps and solar panels to remove reliance on gas for heating. To further reduce CO2 emissions and climate change impact, charging points for electric vehicles need to be provided. We cannot afford to allow developers to make their money to the detriment of the environment.

WE3. Is this the right pool of potential development sites?

As the main site of employment in Westbury is the West Wilts Trading Estate to the north, and people are to be encouraged to walk/cycle to their place of work, then sites to the south of the town are less appropriate. If Leighton House is to be sold, would this be a potential site for development?

WE4. What land do you think is the most appropriate upon which to build?

Only land which currently has good access should be considered, and as mentioned above, sites closer to places of work to reduce reliance on vehicles. Building on sites 6 and 7 would have the greatest environmental and visual impact of the all sites. They have the highest biodiversity value and would be readily visible from the escarpment to the south east, reducing amenity value to the local community and visitors.

WE5. Are there important social, economic or environmental factors you think we've missed that need to be considered

generally or in respect of individual sites?

We reiterate the biodiversity value of sites 6 and 7.

Areas 1, 2, 3 are all in the path of the prevailing SW wind and therefore the plume from the proposed incinerator. It appears that Westbury is a priority to receive pollutants, excessive heavy traffic, rubbish transported for miles, but no adequate infrastructure to support the population. We are expected to take all the negatives whilst other towns manage to gain funding for traffic reduction.

Development of open spaces is certainly key, however, they need to work with habitat that already exists and require appropriate and continuing management. It is not simply a case of ticking a box.

WE6. Are there any issues or infrastructure requirements that should be identified?

Mention is made to sustainable walking and cycling routes. This is all very commendable, but you need to be realistic. Have you ever tried to cycle along the Warminster Road? We would not even risk the prospect. The A350 needs to be addressed as a priority before there is tinkering around the edges.

Further comments

More house building and the resultant increase in vehicles, with both their associated carbon footprints, will only add to Westbury's problems. Most certainly, they will not 'address climate change and support biodiversity net gain.'

Anyone who knows the town will be aware of the volume of heavy traffic which travels along the A350 directly past people's homes. Chalford, Warminster Road and the 90 degree mini roundabouts are major problem areas. This traffic has increased since the closure, then weight restriction on the Cleveland Bridge in Bath. Added to this will be the impact of the Bath Clean Air Zone. Westbury is not even shown on the BANES map of the diversion for the Cleveland Bridge, yet the impact of the number of heavy vehicles is immense. How is it that two adjoining councils: BANES and Wiltshire are unable to communicate about this issue? How can we begin to address climate change when one authority just shoves its problem to Westbury?

Air quality was mentioned at the meeting. Many houses in Westbury are directly adjacent to the A350 and the impact of pollutants on air quality is a real issue, let alone the danger from vehicle movements and damage to property structures which were built decades before the massive lorries thundered past. We were advised that vehicle movements are taken into account. Please act on this advice, as 710 new houses is far too high for the town.

Rep ID: WEST015

Consultee code: General Public

Consultee Organisation (if applicable):

Is this response on behalf of someone else/another organisation? No

Organisation being represented (if applicable):

Does this representation refer to attachment(s):

no

If this representation refers to attachment(s), these are listed below:

WE1. What do you think to the scale of growth? Should there be a brownfield target?

Westbury has expanded massively in terms of housing over recent years but has not had a commensurate increase in infrastructure spending or improvement. It is ridiculous to allow any growth or expansion until the issue of the A350 and a bypass is resolved. The town is blighted by the road and Westbury's residents have to endure pollution, noise, vibration and road danger every day. What part of this would make Westbury suitable for expansion? The town centre is a disgrace with no investment, heart, or attractions. Westbury could be a great town again but it needs the investment first before it grows. In terms of employment land there is a large amount of land that was allocated at Hawkeridge which has not been built upon so this would suggest that there is not the demand for more.

WE2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?

I would question how new development would contribute to any of these worthy priorities. I would suggest that until Westbury's problems are fixed that further housing or employment sites shouldn't be developed. For example, how would a well thought out open space in a new cul-de-sac style developer housing estate contribute to the wider community? It doesn't. The only priority that matters to Westbury's current residents and businesses is the removal of the A350 from the centre of the town.

WE3. Is this the right pool of potential development sites?

Sites 1, 2 and 3 are natural infill site that will have little impact (apart from generating traffic which is, of course, bad).
Site 10 makes sense as it has a good road infrastructure especially if Wiltshire finally build the bridge over the railway that they should have built many years ago.
Site 6 is a very poor choice as this is located in an unspoilt valley at the foot of the ridge. This is a very well used open green space that is enjoyed by much of the town. It would also set a precedent that would change the character of Westbury and its association with the White Horse.
Sites 7 and 8 are poor as they are expanding Westbury at the furthest point from the town centre, railway and infrastructure. It is also next to the A350 which will affect the lives and health of any residents that live there.

WE4. What land do you think is the most appropriate upon which to build?

Greenfield land is obviously the most appropriate but I would suggest that Westbury should not be expanding at the rate that is proposed. It has already grown massively and cannot cope!

WE5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?

The impact of the A350 on the health and safety of residents, the increased traffic that development would generate on the A350, the protection of the surrounding landscape, prevention of urban sprawl

WE6. Are there any issues or infrastructure requirements that should be identified?

Pedestrian safety. Westbury has very poor provision of pavements and crossings. It is impossible to walk with a push chair or pass anyone on the pavement at present in much of the town. It seems that the vehicles are much more important than the people that live in Westbury and need to go about their business.

Further comments

Build the bypass

Rep ID: WEST016

Consultee code: General Public

Consultee Organisation (if applicable):

Is this response on behalf of someone else/another organisation? No

Organisation being represented (if applicable):

Does this representation refer to attachment(s):
no

If this representation refers to attachment(s), these are listed below:

WE1. What do you think to the scale of growth? Should there be a brownfield target?

Westbury currently suffers from high levels of air and noise pollution as well as safety issues as a result of high levels of traffic (particularly HGV's) associated with the A350, which runs across the town. Westbury has had the highest numbers of new housing and more housing developments are being proposed while there are no plans to improve the existing infrastructure, for example, providing a bypass or improving the green and blue infrastructure to solve the critical levels of pollution, which affect the health of every resident in Westbury. No further developments should be allowed to take place until the existing environmental conditions and road safety are improved, which are currently critical and which could only be solved by providing a bypass for Westbury.

WE2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?

Further considerations

Character of buildings

One of the key characteristics of Westbury's buildings is the use of red brick in the facades and boundary walls. Despite its widespread use, it does not become monotonous due to the characterful variety of brick bonds, massing and roof forms along with a good mix of detached semi-detached houses and terraces. New development should reflect this pattern in order to contribute to the varied street scene in Westbury.

Existing building lines should be maintained where possible.

New infill development should be at a density appropriate for the area. Larger developments should match the average density of Westbury.

Street furniture

New street furniture, external lighting and signage should be appropriate for Westbury and made of robust materials to enhance the character of Westbury and minimise unnecessary visual clutter.

Streetscape

The most interesting streetscapes are ones where the building line is adjacent to the pavement or front gardens with no parking have been retained. These conditions enhance the street scene. New development should be generous to pedestrian, cyclist and ecology and provide off-street parking, ensuring that it does not dominate the street scene. Any development along the roadway should consider improvements to pavements where this is lacking. Garden walls bounding the highway (front gardens) should be low enough to allow views of gardens to enhance the street.

Safety

High-speed traffic along the A350 presents a risk to the safety of other road users – cyclists and pedestrians. New development in the areas near the A350 should contribute to measures that enhance pedestrian and cyclist safety. For example, providing crossings, cycle lanes, widening pavements and introducing shared spaces.

Open space

Larger development sites to provide publicly accessible open amenity space appropriate to the scale of development or enhance existing open spaces. New open space should include dedicated, multifunctional play space – a variety of doorstep play areas, local play, neighbourhood play and youth spaces.

Wildlife

Local wildlife can benefit from planting native hedges, creating wooded areas, providing wetland features such as ponds and swales, green roofs, planting flower rich grasslands etc. Such landscape can provide an opportunity to develop wildlife corridors between existing habitat networks as well as providing a valuable community asset for play, relaxation and recreation and offering a solution for air, noise and light pollution.

Hard landscape

Sustainable drainage systems and porous surfaces to be encouraged for external areas surrounding new developments to reduce water run-off, which can lead to localised flooding.

WE3. Is this the right pool of potential development sites?

Sites on the south of Westbury, particularly the large sites number 6 and 7, are part of the most precious countryside in Westbury, which form the valley along the White Horse and could be seen from the hills and tracks leading to the White Horse. The variety of trails and the nature in these areas, particularly Wellhead Springs and White Scar Hanging together with Old Dilton Road and Wellhead Drove attract many locals and visitors from elsewhere and should be protected.

WE4. What land do you think is the most appropriate upon which to build?

Areas around the railway station and the industrial estate have more potential - they provide good transport links and landscape character is less sensitive.

WE5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?

Westbury has the potential to become a very well linked sustainable community due to its railway network and location, however, it is generally not suitable for any kind of sustainable transport at the moment. In many locations, pavements are not existent, and in other places, it is only wide enough for one person. There no dedicated cycle lanes and the main road across Westbury is the A350, which is where you are forced to walk and cycle. If you are brave enough you can risk your health and safety or, alternatively, many people choose to use their cars and join the traffic. This should not be the case in this day and age.

WE6. Are there any issues or infrastructure requirements that should be identified?

As mentioned previously, the following aspects should be considered:

Safety

High-speed traffic along the A350 present a risk to the safety of other road users – cyclists and pedestrians. New development in the areas near the A350 should contribute to measures that enhance pedestrian and cyclist safety. For example, providing crossings, cycle lanes, widening pavements and introducing shared spaces.

Open space

Larger development sites to provide publicly accessible open amenity space appropriate to the scale of development or enhance existing open spaces. New open space should include dedicated, multifunctional play space – a variety of doorstep play areas, local play, neighbourhood play and youth spaces.

Wildlife

Local wildlife can benefit from planting native hedges, creating wooded areas, providing wetland features such as ponds and swales, green roofs, planting flower rich grasslands etc. Such landscape can provide an opportunity to develop wildlife corridors between existing habitat networks as well as providing a valuable community asset for play, relaxation and recreation and offering a solution for air, noise and light pollution.

Hard landscape

Sustainable drainage systems and porous surfaces to be encouraged for external areas surrounding new developments to reduce water run-off, which can lead to localised flooding.

Further comments

Rep ID: WEST017

Consultee code: Parish/Town Council

Consultee Organisation (if applicable): Westbury Town Council

Is this response on behalf of someone else/another organisation? No

Organisation being represented (if applicable):

Does this representation refer to attachment(s):
no

If this representation refers to attachment(s), these are listed below:

WE1. What do you think to the scale of growth? Should there be a brownfield target?

WE2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?

WE3. Is this the right pool of potential development sites?

WE4. What land do you think is the most appropriate upon which to build?

WE5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?

WE6. Are there any issues or infrastructure requirements that should be identified?

Further comments

Westbury Town Council have no comment on the plans relating to Chippenham in the consultation document but look forward to the time when they will be asked to comment on traffic proposals concerning Westbury itself.

We again express our disappointment that other nearby towns are suggested as being worthy of traffic schemes when Westbury is still awaiting any proposal to alleviate air pollution and congestion within the town.

The money allocated by central government has been allocated after submissions by the Unitary Authority who could have displayed greater vision and ambition request at a time when government have declared the intention to pursue large infrastructure projects.

There could have been a submission to include the A350 through Westbury and disappointing that that opportunity was not considered when the bid was prepared.

It is stated that Chippenham needs this road due to it having had large infrastructure developments that require road improvements, but we would respectfully point out that no town within Wiltshire has had a higher percentage increase in building than Westbury and the corresponding spending on associated infrastructure has been zero.

In addition, Westbury has had a long-standing Air Quality Management area in the middle of the town, in a residential area. It is difficult to understand the disparity in resources allocated when popular expression seems to state that the Chippenham scheme is unpopular and unwanted by residents and its MP.

Although not part of the scheme we note that Chippenham has been allocated 2 million towards cycleways to the railway station when Wiltshire officers have stated one of the difficulties within Westbury is pedestrian and cycle access to the station but apparently unworthy of any scheme or funding.

As always, we are interested in any comments you may have.

The comments above were prepared by our councillors and approved at a remote meeting of the Highways, Planning & Development Committee held on Monday 15th February 2021.

Kind regards

Rep ID: WEST018	
Consultee code: General Public	Consultee Organisation (if applicable):
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below:
WE1. What do you think to the scale of growth? Should there be a brownfield target?	
WE2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?	
WE3. Is this the right pool of potential development sites?	

WE4. What land do you think is the most appropriate upon which to build?

WE5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?

WE6. Are there any issues or infrastructure requirements that should be identified?

Further comments

GLENMORE FARM PROPOSED PLANNING APPLICATION HAWKERIDGE ROAD

My comments are as follows:-

As requested by (LVA) in the White Horse News

The proposed planning application for 140 new homes at The Ham, Westbury, Wiltshire on 7.8 hectares.

Firstly, I would like to agree to the comments of:-

[NAME REDACTED] news letter in the White Horse News. I have lived in Westbury for over 50 years and I have also lived in the High Street.

The site is FAR TOO LARGE with 140 houses on one site in respect of the vehicles usage on the road to the West Wiltshire Trading Estate and with no new bypass plans in the near future for a new one.

As to (LVA) saying the site would make up for land and housing shortage: is this a valid point because there are smaller sites being put forward for consideration. These smaller sites would make up for the land and housing shortage which would be more

accessible to the general public and this would indeed help the traffic flow. If the building of the houses goes ahead the supply lorries using the road would be a much larger burden than it is at the moment.

With smaller sites being approved, it would give the general public more choice where they could live and indeed would help the traffic flow as to reply to (LVA). If they installed a electric coded gates for entry this could create a tail back of vehicles because of the waiting time for the gates mechanism to operate fully. This part of Hawkeridge Road is very busy.

Also, what costs would occur to the general public in respect of the road improvements that would be required for the safety to and from the site?

A new long pedestrians footpath has already been constructed along part of Hawkeridge Road.

What changes has arisen since the application was shelved in 2016 with strong opposition from the local residents?

Rep ID: WEST019

Consultee code: Parish/Town Council

Consultee Organisation (if applicable): Heywood Parish Council

Is this response on behalf of someone else/another organisation? No

Organisation being represented (if applicable):

Does this representation refer to attachment(s):
no

If this representation refers to attachment(s), these are listed below:

WE1. What do you think to the scale of growth? Should there be a brownfield target?

WE2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?

WE3. Is this the right pool of potential development sites?

WE4. What land do you think is the most appropriate upon which to build?

WE5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?

WE6. Are there any issues or infrastructure requirements that should be identified?

Further comments

Heywood Parish Council has considered the Wiltshire Council document "Local Plan Looking to the Future – Planning for Westbury", in particular, the section dealing with potential development sites (pages 5-7) and would comment as follows:
Site 1: Land north of Shallow Wagon Lane (SHELAA site 3445) – This site is in open countryside outside of the Westbury settlement boundary in the Parish of Heywood and as such is part of the Heywood Designated Area. The Parish Council is at present preparing a Neighbourhood Plan through consultation with the residents and which includes data from a Rural Housing Needs Survey undertaken by Wiltshire Council on behalf of the Parish Council and which shows that there is no demand for housing in the Parish.

It should be noted that the site includes a possible Romano/British settlement and relics have been found in the past.

Site 2: Land south-east of the West Wilts Trading Estate, land at Glenmore Farm and Land off Storridge Road (SHELAA sites 742, 1014, 883375) – As with Site 1 above the site is in open countryside outside of the Westbury settlement boundary in the Parish of Heywood and as such is part of the Heywood Designated Area. As previously stated the Parish Council is at present

preparing a Neighbourhood Plan which includes data from a Rural Housing Needs Survey undertaken by Wiltshire Council on behalf of the Parish Council and which shows that there is no demand for housing in the Parish.

Development of this site would remove the rural buffer zone between the West Wilts Trading Estate and the existing residential areas on Storridge road, The Ham and Hawkeridge Park. There is an existing Section 52 agreement in place preventing development of part of the site abutting Storridge Road and The Ham which should be taken into account in any consideration of the sites.

The inclusion of the two sites as potential development areas does raise the question as to whether any houses built on both or either of those sites, if adopted, would be deducted from the 710 houses that are to be provided in Westbury as part of the Local Plan or as they would be built outside the existing settlement boundary would Westbury still have to provide 710 houses.

At present, the only new housing allowed in open countryside has to be linked to agricultural or forestry employment so development of either or both sites would lead to a revision of the Westbury settlement boundary to include them and their annexation by Westbury in a future boundary review and the associated demise of the Parish of Heywood.

In conclusion, Heywood Parish Council objects to the inclusion of the Sites 1 and 2 and requests that the sites are omitted from the Local Plan.

Rep ID: WEST020

Consultee code: Developer/Agent

Consultee Organisation (if applicable): Pro Vision

Is this response on behalf of someone else/another organisation? Yes

Organisation being represented (if applicable): Hills UK Ltd.

Does this representation refer to attachment(s):
yes

If this representation refers to attachment(s), these are listed below:
WEST020

WE1. What do you think to the scale of growth? Should there be a brownfield target?

WE2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?

WE3. Is this the right pool of potential development sites?

WE4. What land do you think is the most appropriate upon which to build?

WE5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?

WE6. Are there any issues or infrastructure requirements that should be identified?

Further comments

"Brook Farm, Brook Lane, Westbury

Pro Vision is instructed by Hills UK Ltd to submit representations in response to the Wiltshire Council ('the Council') Consultation on the emerging draft of the Local Plan Review (LPR) to 2036. Specifically, this representation is made in relation to our client's interest at 'Brook Farm, Brook Lane, Westbury'. We have previously submitted this site to the Council as part of the 'Call for Sites (CfS)' exercise and is identified in the Council's Housing and Economic Land Availability Assessment (SHELAA) as site ref: 3681.
Background

The site has previously been promoted for residential development to the emerging Westbury Neighbourhood Plan (WNP) and the Local Plan Review. A Site Promotion Document (March 2020) was submitted to the WNP 'Call for Sites' exercise and accompanies these representations. This demonstrated that the site has two distinct parcels: the first comprises a scheme to convert/redevelop redundant agricultural buildings at Brook Farm to provide a total of seven new homes. The second parcel comprises the release of a greenfield site to deliver approximately 40 new homes, public open space and a new access road.

However, since the initial promotion of the site, Hills has given more detailed consideration to the development of Parcel 2. The outcome of this process has identified that the second parcel could alternatively be provided as an extension to the adjoining allocated 'Principal Employment Area'.

The site lies to the north of the railway, on the western edge of Westbury. A significant proportion of the land to the north of the railway line is in employment use, designated as a 'Principal Employment Area'. To the south of the site is a railway maintenance yard and car auction site. To the east lies the mechanical biological treatment works. To the north, the site adjoins a block of farmland that is allocated as an extension to the Northacre Trading Estate. Accordingly, it is considered that Parcel 2 could instead deliver:

- approximately 1.2ha of new employment land;
- access via a new road along the northern boundary (this could also provide an access to the adjoining allocated employment land to the north); and
- a green buffer/open space would be provided to the west of the parcel to protect the setting of the farmyard and its associated cluster of buildings.

Notwithstanding the above, it remains our client's view that Parcel 2 is suitable for residential development. As noted in the Site Promotion Document, the allocation of our client's site for residential development provides the opportunity to also review the use of the undeveloped land to the north designated as part of the 'Principal Employment Area'. For example, it could be developed as a scheme comprising modern business units and new homes and, therefore, support the introduction of a mixed-use area of development in this sustainable location.

Emerging Strategy & Housing/Employment Need

The Emerging Strategy Paper (January 2021) notes that at Westbury - within the Trowbridge HMA - there is a residual housing requirement of 710 new homes and an additional need for 1ha of new employment land. Our client supports both the need for housing and employment growth to be directed towards Westbury.

Whilst the housing requirement at Westbury is significant, it is considered that the Council needs to identify housing development of varying scales, including small to medium scale sites to provide extra resilience and flexibility to the Local Plan and to ensure that the housing requirement is met over the plan period. The National Planning Policy Framework, at paragraph 68, acknowledges 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'.

Further, the Council should consider providing an additional buffer to the modest employment figure at Westbury to allow for any potential loss of existing employment land within the wider 'Principal Employment Area', particularly given the demand for residential development in this locality.

With the above in mind, there is potential to allocate the site for residential development (i.e. Parcel 1 for 7 new homes and Parcel 2 for 40 new homes). However, if the Council consider it more appropriate, Parcel 2 could alternatively be included in a revised boundary to the 'Principal Employment Area' for the Brook Lane and Northacre Trading Estates.

Brook Farm & Site Assessment

The 'Planning for Westbury' Paper (January 2021) does not identify any potential sites and/or amendments to the boundaries of the 'Principal Employment Areas'. The "pool" of sites selected in the Paper appear to relate to sites promoted for residential use only.

Our client's land is not selected for residential development in the Council's 'Site Selection Report for Westbury' (January 2021) for the following main reasons:

- impact on heritage, including the Grade II Listed, impact on non-designated heritage assets (i.e. Brook Mills) and the impact on the scheduled Monument and field systems to the west of Brook Farm;
- impact on flood risk; and
- loss of the farmstead.

It appears that the Council's assessment of the site is flawed and does not consider the two separate development parcels and the type of development proposed (i.e. at the time of the assessment conversion/new build at Parcel 1 and new-build residential at Parcel 2).

It is considered that the site is suitable for development for the following reasons:

- There is a need to identify additional housing and employment land at Westbury to meet needs over the plan period.
- The parcel would adjoin the existing built-up area and, therefore, forms a logical extension.

The site is close to the railway station and bus services on the B3097 and, therefore, is a sustainable location for development.

- With regards to residential development, it can naturally be orientated to face west (away from the adjoining employment uses) and, as explained above, there is an opportunity to review the use the undeveloped land to the north designated as part of the 'Principal Employment Area' as a mixed-use development.
- Employment uses in this location would also be in keeping with the existing surrounding area and 'round off' development in this locality.
- Any scheme would conserve and enhance the setting of the Listed Building and put the non-designated heritage assets to a viable alternative use.
- The development of the parcel provides an opportunity to deliver a new access road along the northern boundary and which could be used to facilitate access to the adjoining allocated land to the north.
- To conserve and enhance the setting of the Grade II Listed farmhouse, an arc of green space/public open space would be retained, wrapping around the farmstead to the east and south to provide a robust boundary/buffer to the farmstead and an area for biodiversity enhancements.

- The majority of the site is within Flood Zone 1 (low probability of flooding) and a sustainable drainage system would be provided. Any development would seek to avoid the small areas of Flood Zones 2 and 3 where appropriate and provide flood mitigation measures where necessary.
- The parcel is greenfield - therefore it is likely that there are no significant constraints (such as contamination) which would preclude development of the site on viability grounds.
- The parcel is available for residential/employment development immediately. The development land is retained by Hills.
- Furthermore, as far as we are aware, there are no factors which would prevent this site coming forward for development.

Accordingly, there are no identifiable constraints that would prevent the delivery of the site for development. It is therefore considered that the site is suitable and available and can be used to deliver an attractive and sustainable development which would deliver key benefits, whether that be for a full residential scheme or a mixed-use scheme of residential and employment uses.

We trust the above comments clearly set out Hills's position at this stage. We look forward to engaging with the Council through the continued preparation of the Plan and to provide further information to support the promotion of the site for development. We would be very happy to arrange a meeting to enable further discussions."

[See attachment WEST020 for Site Location Plan and copy of response to Westbury Neighbourhood Plan Call for Sites process]

Rep ID: WEST021	
Consultee code: Other Advisory Bodies	Consultee Organisation (if applicable): The Campaign to Protect Rural Wiltshire (CPRE)
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): yes	If this representation refers to attachment(s), these are listed below: WEST021
WE1. What do you think to the scale of growth? Should there be a brownfield target?	
<p>Based on the evidence in the reports we have commissioned we would argue that much less housing is needed There should be a brownfield target arrived at through consultation via the Neighbourhood Plan Housing growth must be in balance to employment growth (will there be any?) locally in order to reduce commuter journeys, and in balance with the town's sensitive landscape setting and heritage assets A masterplan is being produced for the town centre which will need studying during future consultations which should concentrate on providing a good range of shops because Westbury residents have to travel to Warminster, Trowbridge or Frome for specialist shopping. Any development should contribute towards improvement of the air quality in the town centre.</p>	

WE2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?

Will the Westbury employment situation be reappraised to take into account the reality post Covid? Will the Masterplan, like a Neighbourhood Plan, take into account the change in shopping patterns, travel patterns and consequently consider the town centre for some housing? Town centre regeneration should be a priority.

WE3. Is this the right pool of potential development sites?

No

The redundant Lafarge cement works site is an ideal brown field site requiring re development providing design is treated with utmost importance due to its sensitive location in full view of the Special Landscape Area of the Well Head Valley and White Horse Escarpment.

WE4. What land do you think is the most appropriate upon which to build?

No response

WE5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?

The Covid-19 pandemic has highlighted the need for people to get out into the countryside for the physical and mental health so the need to protect undesignated green fields is vital.

Westbury cannot afford to have any more green fields destroyed (White Horse View housing estate being the latest) so the only sites suitable for any necessary housing are brown field sites. There is no need for any more new employment sites because the large West Wilts Trading Estate and Northacre Estate provide sufficient employment bearing in mind there are always empty units on the West Wilts Trading Estate.

It is worrying to read in paragraphs 25, 26 and 27 that "land around Westbury is being promoted for development by landowners or prospective developers" - this must not be allowed to happen for the reasons explained above.

The redundant Lafarge cement works site is an ideal brown field site requiring re development providing design is treated with utmost importance due to its sensitive location in full view of the Special Landscape Area of the Well Head Valley and White Horse Escarpment.

The revised Westbury incinerator proposal by Northacre Renewable Energy Ltd must be rejected. Strong opposition has come from thousands of local people, more than ten local town and parish councils and protest groups such as the Westbury Gasification Action Group/ No Westbury Incinerator and MP Dr Andrew Murrison.

WE6. Are there any issues or infrastructure requirements that should be identified?

An eastern Westbury bypass would now be seriously out of date given the radical changes to the work place and lifestyles, which will affect the work/travel pattern for the future. This unnecessary road would waste millions of taxpayer's money and ruin the Special Landscape Area (SLA) of the Wellhead Valley, the White Horse Escarpment and the Upton Cow Down Escarpment which is currently under review by Natural England for designation as an Area of Outstanding Natural Beauty (AONB). The LP map shows prospective areas of housing that encroach on the Wellhead Valley - these areas of housing must not be considered for entry into the Local Plan because this would jeopardise Natural England's ability to designate the valley and escarpments as an AONB.

Sustainable transport requires improvement (i.e. public transport, walking and cycling) to provide connectivity between the town centre, the railway station and the employment areas NW of the town. A review of travel patterns must take place to establish what the movement numbers are and will be in the future...not look backwards to previous modelling.

Further comments

Housing provision should be tailored to the needs of any particular area. Using the housing needs survey sent to each household in Wiltshire to identify those needs.

Rep ID: WEST023

Consultee code: General Public

Consultee Organisation (if applicable):

Is this response on behalf of someone else/another organisation? No

Organisation being represented (if applicable):

Does this representation refer to attachment(s):
no

If this representation refers to attachment(s), these are listed below:
WEST023

WE1. What do you think to the scale of growth? Should there be a brownfield target?

Scale of growth is low, homes in pipeline need to be delivered.
A brownfield target is desirable but cannot be guaranteed so should not be to the detriment of suitable identified and deliverable greenfield land.

WE2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?

Development needs to be sustainable, deliverable and without overarching constraints or burdens.

WE3. Is this the right pool of potential development sites?

Appears right pool of potential development sites

WE4. What land do you think is the most appropriate upon which to build?

Greenfield land site 7 would go towards meeting Westbury's strategic housing requirement in the short/medium term.

WE5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?

None

WE6. Are there any issues or infrastructure requirements that should be identified?

None

Further comments

Rep ID: WEST024

Consultee code: Developer/Agent

Consultee Organisation (if applicable): Planning Sphere

Is this response on behalf of someone else/another organisation? Yes

Organisation being represented (if applicable):

Does this representation refer to attachment(s):
yes

If this representation refers to attachment(s), these are listed below:
WEST024

WE1. What do you think to the scale of growth? Should there be a brownfield target?

WE2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?

WE3. Is this the right pool of potential development sites?

WE4. What land do you think is the most appropriate upon which to build?

WE5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?

WE6. Are there any issues or infrastructure requirements that should be identified?

Further comments

1.0 Introduction

1.1 PlanningSphere have been instructed to make representations to the Wiltshire Local Plan Review (Regulation 18) on behalf of [NAME REDACTED] who is the freehold owner of Land at Bratton Road, Westbury. The subject site is outlined on the Site Location Plan shown at Appendix A.

1.2 This representation follows the refusal of a previous outline speculative planning application proposal for 47 No. dwellings which was subject to a withdrawn appeal. This application was only refused on the principle of development – all applicable technical issues were resolved.

1.3 The subject site was removed from the first round of sifting in the Site Selection Report on grounds of landscape impact. There was no landscape objection raised during the 2016 assessment of the planning application. We have also enclosed a Landscape Scoping Report that confirms that landscape impact of development on the subject, with mitigation, would be acceptable in terms of its impact upon the wider landscape.

1.4 This 'omission site' representation invites the Council to re-instate the subject site for the next round of assessment. We further contend 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.

1.5 We would welcome an opportunity to discuss the promotion of this site through subsequent stages of the Local Plan Review with the Council's Spatial Planning Team in due course.

2.0 Relevant Background Information

(i) Site Description and Context

2.1 The subject site is approximately 2.3 hectares in size and is located to the northeast of the existing built area of Westbury. Directly to the east and north of the site are areas of agricultural land with the B3098 Bratton Road running east-west and forming the site's southern boundary. A former Coach Road, now a public footpath, runs along the site's western boundary. The site slopes down from south boundary from 90m AoD to a low point of 67m AoD at the intersection of the former Coach Road and Bitham Park.

[See attachment WEST024 for Maps]

2.2 A Land Registry search has confirmed that the triangle of land bounded by the former Coach Road and Bitham Park is owned by the Council. The only known physical site constraints are an overhead power cable, and boundary hedgerows. The nearest dwelling is Hillfield which is located adjacent to the south east boundary along Bratton Road.

2.3 A detailed description of the site and its landscape context is set out in the accompanying Landscape Scoping Report at Appendix C.

(ii) Existing Lawful Use and Planning history

2.4 The subject site has an established existing lawful use as agricultural land. Planning history recorded on the Council's public access system includes the following decisions.

[See attachment WEST024 for Tables]

2.4 Following the refusal of outline application 16/06413/OUT, Wain Homes took forward the case and submitted a second identical application and also submitted a planning appeal. The appeal was subsequently withdrawn in 2018 because at that time the Council were able to demonstrate a five-year housing land supply.

2.5 Other relevant planning history relating to Bitham Park. This is a residential site circa 350m to the north of the subject site, and south of Trowbridge Road, is referred to below. The Bitham Park site is now well advanced on site and has changed the context of the subject site, and also includes a Neighbourhood Area of Play, which would be useful amenity for future residents of the subject site.

[See attachment WEST024 for Table and Maps]

(iii) Existing planning policy context and constraints

2.7 The Development Plan for the site comprises:

- Wiltshire Core Strategy (adopted January 2015);
- Wiltshire Housing Site Allocation Plan (adopted February 2020)

2.9 Applicable designations from the Wiltshire Core Strategy proposals map are shown in Figure 2 below:

[See attachment Wtes024 for Maps]

(i) Legal ownership and delivery mechanism

3.1 [NAME REDACTED] owns the freehold interest of the subject site. In the event that an allocation is secured, a housing delivery partner will be sought. The size of the subject site would be attractive to a local / regional SME developer.

3.2 This representation seeks to promote the subject site on a standalone basis. However, it is noted that the adjacent land to north (SHELAA Ref: 3679) is also being promoted for development. In the event that the Council reconsider the inclusion of both the subject site and adjacent land parcel 3679 in the pool of sites to taken forward for further assessment, we can confirm that the owner of the subject site would be willing to cooperate in the preparation of comprehensive masterplan whereby the SHELAA site could for example take vehicular and/or pedestrian/cycle access through the subject site.

(ii) Developable Area Parameters

3.3 Having regard to the site constraints and opportunities, which have been evaluated in detail by the project team, the project landscape architect has formulated a parameter plan, identifies the extent of developable area. This extends to approximately 1.5 ha, which yields a potential site capacity of circa 40 No. residential units allowing for an increased vegetated buffer on the southern boundary adjacent to Bratton Road, in accordance with the advice set out in the Landscape Scoping Report.

[See attachment West024 for Maps]

3.3 The elements of the indicative Parameter Plan include the following:

- Vehicular access: is proposed via a simple priority junction from Bratton Road. The geometry and location of this access was agreed with the Highway Authority under planning application 16/06413/OUT.
- Ecological mitigation: the subject site is located in a bat consultation zone. Additional in-season bat surveys were conducted in 2020 to augment the survey evidence that was obtained in 2015 and 2016. This re-confirmed that foraging bats are using the hedgerow perimeters on the south and western boundaries. The Parameter Plan at Appendix B makes provision of dark green buffers against existing hedgerows to ensure that proposals will not adversely affect bat foraging activity. Given the size of the landholding it is considered that it will be possible to address the 10% biodiversity net gain requirement on site.
- Landscape: the landscape context has been re-assessed in the Landscape Scoping Report at Appendix C. Subject to additional screening on the southern frontage, with built development set further into the site, combined with street trees along the spine road, the impact of development could be mitigated to an acceptable degree from key publicly accessible viewpoints.

- Drainage: the drainage strategy, which was agreed under planning application 16/06413/OUT was informed by ground water monitoring over a whole winter season, and infiltration testing. The attenuation basin shown on Parameter Plan have been sized under a worst-case scenario to ensure that surface water discharge from the site would be less than the existing greenfield runoff rate with the appropriate climate change allowance applied. Foul drainage connections are available to existing mains services.

(iii) Proposed further work in progress to develop the evidence base

3.4 Following the submission of the Regulation 18 representations, the project team will commission the following further work:

- Further design development to take account of the updated landscape and ecology advice to reformulate the Parameter Plan.

- Reworking of the illustrative layout to ensure that the layout complies with the latest national design guidance that is likely to be published in the forthcoming revision to the NPPF and associated planning practice guidance.

3.5 The project team will be willing to share this information as part of an evolving technical evidence base with the Council's Spatial Planning Team in the event that the site is taken forward into the next round of detailed assessment.

[See attachment WEST024 for ESS text]

(iii) Comment on the subject site (An omission site the Site Selection Report)

4.15 It is understood that the external consultants acting for the Council have assisted in assessing prospective development sites. Wiltshire Council's high-level summary assessment of Site 5 (the subject site) is set out in the table below:

[See attachment WEST024 for Tables]

4.16 The high-level 'traffic light' assessment of the subject site is not considered to be well founded. We have set out comments below in respect of the five criteria in the table below:

[See attachment WEST024 for Tables]

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 order to meet the test of soundness, we consider that the Council should re-assess and allocate the subject site. This is on the basis that the subject site is: (i) available; (ii) technically deliverable; and (iii) is viable for delivery early in the plan period.

5.3 In summary, the allocation of the subject site would deliver the following benefits:

- A site suitable for delivery of circa 40 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 Bratton Road.
- The ability to mitigate the impact of development on the wider landscape.
- The ability to address ecological constraints and deliver biodiversity net gain on site.
- A drainage strategy that will mitigate against flood risk as part of an integrated green and blue infrastructure strategy.
- Provision of a areas of onsite publicly accessible open space.

5.4 Given we have demonstrated that the subject site is suitable and technically deliverable and noting that assessment and determination of planning applications 16/06413/OUT and 17/11359/OUT did not include any technical reasons for refusal, we request the Council acts proactively to plan for housing need in Westbury and allocates the subject site (SHEELA Site 3404) for approximately 40 No. dwellings and associated public open space and green infrastructure.

Rep ID: WEST025

Consultee code: Developer/Agent

Consultee Organisation (if applicable): Asset Sphere Planning

Is this response on behalf of someone else/another organisation? Yes

Organisation being represented (if applicable):

Does this representation refer to attachment(s):
yes

If this representation refers to attachment(s), these are listed below:
WEST025

WE1. What do you think to the scale of growth? Should there be a brownfield target?

WE2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?

WE3. Is this the right pool of potential development sites?

WE4. What land do you think is the most appropriate upon which to build?

WE5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?

WE6. Are there any issues or infrastructure requirements that should be identified?

Further comments

AssetSphere Ltd have been instructed to make representations to the Wiltshire Local Plan Review (Regulation 18) on behalf of [NAME REDACTED] who is the freehold owner of the Land North of Shallow Waggon Lane. The proposed site is outlined in red below.

[See attachment WEST025 for Maps]

The subject site is approximately 4.05 hectares suitable for residential development including the provision of public open space which would allow for the provision of approximately 80 dwellings.

The Council have utilised external consultants to undertake an assessment of the prospective development site. The following extract of the Council's high level summary relates to the subject site.

[See attachment WEST025 for Tables]

Having reviewed the high level assessment comments, we have set out our comments below in respect of the 5 criteria areas in the table below.

[See attachment WEST025 for Tables]

In conclusion, the above site provides a site for sustainable development and meets objectives within the Westbury Strategic Context and therefore should be allocated for future development to meet the Wiltshire Housing Supply.

Rep ID: WEST026

Consultee code: Developer/Agent

Consultee Organisation (if applicable): Asset Sphere Ltd

Is this response on behalf of someone else/another organisation? Yes

Organisation being represented (if applicable): A&J Richards and M&C Mould Consortium

Does this representation refer to attachment(s):
yes

If this representation refers to attachment(s), these are listed below:
WEST026

WE1. What do you think to the scale of growth? Should there be a brownfield target?

WE2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?

WE3. Is this the right pool of potential development sites?

WE4. What land do you think is the most appropriate upon which to build?

WE5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?

WE6. Are there any issues or infrastructure requirements that should be identified?

Further comments

AssetSphere Ltd have been instructed to make representations to the Wiltshire Local Plan Review (Regulation 18) on behalf of [NAME REDACTED] who are the freehold owners of the Land At Slag Lane. The proposed site is outlined below.

[See attachment WEST026 for Maps]

The subject site is approximately 5.2 hectares suitable for residential development, the subject site is enclosed by the railway line on two sides and Frogmore Road on the other. The subject site would allow for the provision of approximately 150 dwellings.

The Council have utilised external consultants to undertake an assessment of the prospective development site. The following extract of the Council's high level summary relates to the subject site.

[See attachment WEST026 for Tables]

Having reviewed the high level assessment comments, we have set out our comments below in respect of the 5 criteria areas in the table below.

[See attachment WEST026 for Tables]

In conclusion, the above site provides a site for sustainable development and meets objectives within the Westbury Strategic Context and therefore should be allocated for future development to meet the Wiltshire Housing Supply.

Rep ID: WEST027	
Consultee code: Developer/Agent	Consultee Organisation (if applicable): Asset Sphere Ltd
Is this response on behalf of someone else/another organisation? Yes	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): yes	If this representation refers to attachment(s), these are listed below: WEST027
WE1. What do you think to the scale of growth? Should there be a brownfield target?	
WE2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?	
WE3. Is this the right pool of potential development sites?	

WE4. What land do you think is the most appropriate upon which to build?

WE5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?

WE6. Are there any issues or infrastructure requirements that should be identified?

Further comments

AssetSphere Ltd have been instructed to make representations to the Wiltshire Local Plan Review (Regulation 18) on behalf of [NAME REDACTED] who is the freehold owner of the Land adjoining Old Dilton Road and Tickle Belly Lane. The proposed site is outlined below.

[See attachment WEST027 for Maps]

The subject site is approximately 0.75 hectares suitable for residential development including the provision of public open space which would allow for the provision of approximately 20 dwellings.

The Council have utilised external consultants to undertake an assessment of the prospective development site. The following extract of the Council's high level summary relates to the subject site.

[See attachment WEST027 for Tables]

Having reviewed the high level assessment comments, we have set out our comments below in respect of the 5 criteria areas in the table below.

[See attachment WEST027 for Tables]

In conclusion, the above site provides a site for sustainable development and meets objectives within the Westbury Strategic Context and therefore should be allocated for future development to meet the Wiltshire Housing Supply.

Rep ID: WEST028

Consultee code: Developer/Agent

Consultee Organisation (if applicable): Gladman Developments

Is this response on behalf of someone else/another organisation? No

Organisation being represented (if applicable):

Does this representation refer to attachment(s):
no

If this representation refers to attachment(s), these are listed below:

WE1. What do you think to the scale of growth? Should there be a brownfield target?

Gladman support the identification of Westbury as a location for residential and employment development. Westbury is a highly sustainable settlement, which should continue to play its part in meeting the County's future housing needs. The town will need to accommodate a range of additional development in the period to 2036. The Council has recognised this within the new strategy by seeking to allocate a further 710 homes up until 2036

WE2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?

WE3. Is this the right pool of potential development sites?

Gladman support the inclusion of Site 2: Land south-east of the West Wilts Trading Estate, land at Glenmore Farm and Land off Storridge Road (SHELAA sites 742, 1014, 883375) and consider it is suitable for allocation through the local plan making process. Westbury is a sustainable settlement with a wide range of services and facilities. The proposed development site consists of a single 5.75ha arable field that lies to the North West of the settlement. It is a well contained site bound by residential properties on Storridge Road to the south, residential properties on The Ham to the east, the West Wilts Trading Estate to the west and open fields to the north.

The site is located within Westbury, with strong linkages to both the town centres facilities and amenities and the employment areas. The site is also in close proximity to the station.

The site will be accessed through a pair of semi-detached residential properties on Storridge Road via a priority-controlled junction and has an indicative capacity for 200 dwellings. The site is suitable, available and achievable and would see considerable delivery within 0-5 years of achieving planning consent.

WE4. What land do you think is the most appropriate upon which to build?

WE5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?

WE6. Are there any issues or infrastructure requirements that should be identified?

Further comments

Rep ID: WEST029

Consultee code: Developer/Agent

Consultee Organisation (if applicable): David Lock Associates

Is this response on behalf of someone else/another organisation? Yes

Organisation being represented (if applicable): Tarmac Cement and Lime Ltd

Does this representation refer to attachment(s):
no

If this representation refers to attachment(s), these are listed below:

WE1. What do you think to the scale of growth? Should there be a brownfield target?

WE2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?

WE3. Is this the right pool of potential development sites?

Land at the former Westbury Cement Works has not been considered as a potential location for employment uses, but in our view forms a suitable and deliverable location for an employment allocation.

Our response to the Spatial Strategy sets out our view that additional employment land should be allocated at Westbury to ensure that key principles set out in the FEMA Review and ELR are met. These include recognition of the need for modern employment stock, for stock to be available to meet short term requirements and to recognise that qualitative considerations have not been reflected in the quantitative exercises undertaken in the ELS.

The Westbury Works site is able to respond positively to those challenges since it:

- can uniquely offer rail and strategic highway access;
- is served by existing utilities infrastructure;
- offers flexibility in the provision of open or built employment uses;
- can be flexibly parcelled within a master planned framework able to meet small or larger requirements responsive to market needs; and
- can offer a controlled and secure environment.

A separate 'Call for Sites' submission will be made providing a master plan for the site.

WE4. What land do you think is the most appropriate upon which to build?

WE5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?

WE6. Are there any issues or infrastructure requirements that should be identified?

Further comments

Rep ID: WEST030

Consultee code: Developer/Agent

Consultee Organisation (if applicable): Savills

Is this response on behalf of someone else/another organisation? Yes

Organisation being represented (if applicable): Barratt Homes

Does this representation refer to attachment(s):
yes

If this representation refers to attachment(s), these are listed below:
WEST030

WE1. What do you think to the scale of growth? Should there be a brownfield target?

WE2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?

WE3. Is this the right pool of potential development sites?

WE4. What land do you think is the most appropriate upon which to build?

WE5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?

WE6. Are there any issues or infrastructure requirements that should be identified?

Further comments

1. Introduction

1.1 These representations have been prepared and submitted by Savills on behalf of Barratt Homes plc in response to the Wiltshire Local Plan Review (LPR).

1.2 Barratt Homes have very recently acquired an interest in an area of 11.33ha of land adjacent to the eastern edge of Westbury (Site Location Plan attached in Appendix 1). This forms one of a number of the sites which Westbury Town Council identify as having the 'potential for a site allocation' within their draft response to the LPR (available on their website); a judgement based upon the work which they have undertaken in support of their emerging Neighbourhood Plan.

1.3 The decision to progress with the LPR despite the emerging Planning White Paper (PWP) is supported. It is of critical importance that Wiltshire progress with their local plan update given the plan period for the adopted Core Strategy is due to expire shortly, and in light of the current five year housing land supply deficit. The Council's decision is consistent with the advice of the Chief Planner and Secretary of State, both of whom have expressly confirmed that the PWP should not delay plan-making.

1.4 Our representation is made with regard to the legal requirements of bringing forward a new Development Plan Document, and in respect to the tests of soundness set out in paragraph 35 of the NPPF. Given the timelines associated with the LPR, we assume that the current consultation on changes to the NPPF will have concluded and a revised Framework issued prior to the LPR having reached an advanced stage. We therefore reference the draft NPPF (dNPPF) where appropriate in this consultation response.

Place Shaping Priorities

4.1 We support the draft Place Shaping Principles.

4.2 A number of these need to be addressed by the LPR evidence base – notably, with the drafting of a transport strategy. This should consider all the aspirations for delivery of transport infrastructure (relating to both sustainable travel choices, and those related to vehicular movements), and should set out a strategy which seeks to maximise sustainable travel choices. We note the historical aspirations for a bypass for the town and the refused 2009 application; however, we have not seen any recent evidence to demonstrate that there is a need for a bypass, and/or whether alternative strategies (such as the enhanced railway services) represent a more appropriate option.

4.3 A transport strategy for the town could be used to inform not only the choice of allocations but determine site specific measures – and whether these should be delivered on-site, through a s106 contribution, and which strategic elements are most appropriately funded through CIL.

Potential Development Sites

4.4 We have reviewed the Site Selection report, and set out our comments below.

4.5 We have also reviewed Westbury Town Council's draft response to the consultation (which is available on their website), and note that they have undertaken a more detailed site assessment process which should replace the preliminary work undertaken for the LPR.

4.6 In reviewing the Town Council's comments, we note that they indicate that a number of the sites are not available. In presenting options for development, the Authority must confirm that the sites are available – with the need for recent confirmation by the landowner/developer/promoter that they are available for development now.

[See attachment WEST030 for Tables]

Settlement Profile

4.7 We recognise the reference to current education capacity in the town; however note that the evidence base also demonstrates that by 2036 there will be a 17% reduction in the population of the Town falling within the 0-14 age category. Further evidence should be published setting out the pupil projections over the plan period to provide clarity on when/if additional education provision is required.

Land at Bitham Park, Westbury

4.8 Barratt Homes have very recently acquired an interest in an area of 11.33ha of land adjacent to the eastern edge of Westbury (Site Location Plan attached in Appendix 1). This directly borders the successful schemes at Mill Brook and Bitham Park which are currently being built out; and are due for completion shortly.

4.9 The site is assessed within the Site Selection Report, but incorrectly as part of a significantly larger area under site reference: 3679. This is a materially different site area, and the assessment of the smaller Barratt parcel will vary accordingly.

4.10 We note that the site is identified by Westbury Town Council as being “potentially suitable for allocation” at an area of approximately 8.8ha⁷. This is supported by detailed work undertaken by the Neighbourhood Plan Group in support of their emerging Plan; and is based upon the industry recognised AECOM NDP site assessment process. It has been by its nature a more detailed process than that undertaken at this stage of the LPR, and is therefore a more robust evidence base at this stage. The site must be included within the sites identified as potential allocations within the LPR, and the site assessment updated accordingly to reflect the corrected site area.

4.11 We consider the site below in accordance with the methodology set out for the Stage 2 Site Sifting:
[See attachment WEST030 for Tables]

4.12 We have committed to working with Westbury Town Council/Neighbourhood Plan Group to explore the potential for development on this site further, and are aware of the potential requirement to work collaboratively with neighbouring land owners.

4.13 We would welcome the opportunity to engage directly with Wiltshire Council in this process.
[See attachment WEST030 for Location Plan and Preliminary Landscape and Visual Assessment]

Rep ID: WEST031	
Consultee code: Developer/Agent	Consultee Organisation (if applicable): Origin3
Is this response on behalf of someone else/another organisation? Yes	
Organisation being represented (if applicable): Gleeson Strategic Land Ltd	
Does this representation refer to attachment(s): yes	If this representation refers to attachment(s), these are listed below: WEST031
WE1. What do you think to the scale of growth? Should there be a brownfield target?	
WE2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?	
WE3. Is this the right pool of potential development sites?	

WE4. What land do you think is the most appropriate upon which to build?

WE5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?

WE6. Are there any issues or infrastructure requirements that should be identified?

Further comments

Executive Summary

This representation to the Wiltshire Local Plan Review has been prepared by Origin3 on behalf of Gleeson Strategic Land Ltd (Gleeson). The statement has been written in respect of Land south of Sandhole Lane in Westbury, which is referenced as Site 7 in the Planning for Westbury Local Plan Review document.

Westbury is located within the Trowbridge Housing Market Area (HMA). The Emerging Spatial Strategy sets a housing requirement of between 40,840 and 45,630 new homes over the plan period of 2016 to 2036. The strategy sets out that 11,000 of these dwellings are required in the Trowbridge HMA. This is based on the higher housing figure which is informed by the need to provide homes to support jobs.

The approach of setting the higher housing requirement figures for the district and Trowbridge HMA is supported, however the plan period should be extended to a minimum of 15 years to 2038. This would result in an increased district housing requirement of a minimum of 50,192 dwellings, and an increased housing requirement of around 12,100 dwellings in Trowbridge HMA.

The most appropriate location for this increase in Trowbridge HMA housing requirement is considered to be Westbury. The sustainability appraisal has demonstrated that Westbury is the only main settlement in Trowbridge HMA that is able to accommodate an increased level of growth, and there are a number of sites being promoted that could be suitable for residential development. This includes Land south of Sandhole Lane (Site 7).

An Outline planning application was submitted by Gleeson Strategic Land in December 2020 for the northern field within Site 7 and a decision is currently pending (reference 20/11515/OUT). The submission of the Outline planning application demonstrates that the site is available, suitable, viable, and deliverable.

In addition, Gleeson are promoting land to the west of Site 7, at Titford Farm. We consider that there is an opportunity to connect Site 7 to this land and pursue a wider land assembly to the south of Westbury. This could enable a comprehensive strategy for residential development in Westbury.

1 Introduction

1.1 This representation has been prepared by Origin3 on behalf of Gleeson Strategic Land Ltd (Gleeson) in respect of Land south of Sandhole Lane in Westbury, which is referenced as Site 7 in the Planning for Westbury Local Plan Review document.

1.2 An Outline planning application for the development of up to 67 homes on the site was submitted by Gleeson Strategic Land in December 2020, and a decision is currently pending (reference 20/11515/OUT). The submission of the Outline planning application demonstrates that the site is suitable, available, viable, and deliverable.

1.3 The location plan below shows within the red line the land submitted in the Outline planning application. The land in blue is also within the control of Gleeson, and is included within this representation.

[See attachment WEST031 for Maps]

1.4 Wiltshire Council is undertaking a Local Plan Review. Between the 13th January 2021 and 9th March 2021, the Council are consulting on an Emerging Spatial Strategy for Wiltshire, including site allocation options for accommodating growth at Principal Settlements and Market Towns.

1.5 This representation is prepared to respond to the Wiltshire Local Plan Review consultation documents relating to Westbury, which comprise:

- Emerging Spatial Strategy
- Planning for Westbury
- Site Selection Report for Westbury
- Planning for Trowbridge
- Site Selection Report for Trowbridge

1.6 This representation is structured as follows:

- Section 2 provides a review of the overall housing requirement for Wiltshire.
- Section 3 reviews the Trowbridge Housing Market housing requirement.

- Section 4 considers the Trowbridge HMA emerging development strategy
- Section 5 considers the emerging allocation options in and around Westbury including Land south of Sandhole Lane
- Section 6 provides a conclusion.

5 Site Selection at Westbury

5.1 Westbury is identified as a Market Town within the Trowbridge Housing Market Area (HMA), with the potential for significant development that will increase the number of jobs and homes to help sustain/enhance services and facilities, and promote self-containment and sustainable communities.

5.2 The Planning for Westbury document and Site Selection Report how growth in Westbury is being planned, and which sites are being considered for allocation. Key priorities are set out comprising:

- Development should deliver well-designed homes, properly supported by infrastructure, to meet Westbury's needs.
- Development should contribute towards sustainable transport links (particularly walking and cycling routes) within the town and to the surrounding parishes and between the railway station, employment areas and the town centre.
- Develop a strategy for the regeneration of the town centre taking into consideration the emerging Westbury Town Plan, to encourage spending, improve accessibility, better manage traffic and parking and safeguard heritage assets.
- Development should contribute towards the improvement of air quality and support the Air Quality Management Area (AQMA) in Westbury town centre. It should address traffic issues in the town including consideration of, where appropriate, the route of the A350 through the town, including options for a bypass, and the need for a distributor road to relieve congestion on Oldfield Road.
- Development should deliver well thought out open spaces and landscaping to ensure residents can benefit from and enjoy their environment, regardless of whether they are on foot or using transport, and should link with other areas to allow easy access to all parts of the town.
- Retain existing employment areas and support their expansion to provide employment locally.

5.3 The Planning for Westbury report sets out that there are a number of sites being promoted around Westbury, and that the Council are assessing the development potential of a selected number of these sites. In total 12 sites have been identified for further assessment by the Council. This includes Site 7: Land south of Sandhole Lane (see map in Appendix 1).

Land south of Sandhole Lane

5.4 The Land south of Sandhole Lane is identified as 'Site 7' in the Westbury site assessments and comprises SHELAA sites 622, 3337 and 3375 (Appendix 1).

5.5 The Site Selection Report provides a summary of the Council's initial review of the SHELAA sites comprising Site 7 Land south of Sandhole Lane. The initial review is relatively positive and demonstrates that the site has good accessibility and is less constrained by landscape than other areas around Westbury.

5.6 We would also note that Site 7 is less constrained by bat sensitivity zones than the northern edge of Westbury, and less constrained by flood risk and heritage than land to the west.

5.7 The Land south of Sandhole Lane benefits from proximity to Dilton Marsh train station, which is located approximately a 15 minute walk or 5 minute cycle ride away.

5.8 An Outline planning application for the development of up to 67 homes at Land south of Sandhole Lane was submitted by Gleeson Strategic Land in December 2020 (the northern field within SHELAA site 622), and a decision is currently pending (reference 20/11515/OUT). The submission of the Outline planning application demonstrates that the site is suitable, available, viable, and deliverable.

5.9 Technical reports, surveys, and masterplanning exercises have been undertaken to support the Outline application. The evidence submitted with the application demonstrates that the Council's comments below relating to considerations such as flood risk, can be resolved through mitigation.

5.10 We support that the Council is taking forward Site 7, and encourage the Council to allocate this land for residential development.

5.11 In addition, Gleeson are promoting land to the west of Site 7, at Titford Farm. We consider that there is an opportunity to connect Site 7 to this land and pursue a wider land assembly to the south of Westbury. This could enable a comprehensive strategy for residential development in Westbury.

5.12 The Outline planning application (reference 20/11515/OUT) submitted at Land south of Sandhole Lane has included the potential for a link through the site to provide access to Titford Farm.

[See attachment WEST031 for Tables]

6 Conclusion

6.1 In conclusion, we support the approach of integrating the strategy for housing with that of the economic development strategy, but consider that the plan period needs to cover a minimum 15 year period from adoption in accordance with the NPPF. The local plan should therefore be extended to at least 2038 and the number of dwellings required should be increased accordingly to at least 50,192 dwellings.

6.2 We support the approach of taking forward the higher housing requirement in the Trowbridge HMA, but this figure should be increased to a minimum of 12,100 dwellings to cover the minimum 15 year plan period to 2038.

6.3 The Council has identified through sustainability appraisal that Westbury is the only settlement in Trowbridge HMA that is able to accommodate a higher level of growth. We therefore consider that the additional housing requirement in Trowbridge HMA created by extending the plan period to 2038 should be directed to Westbury.

6.4 Land south of Sandhole Lane is referred to as Site 7 in the Planning for Westbury document. We support the Council in taking this site forward, and encourage the allocation of the site for residential development. An Outline planning application was submitted by Gleeson Strategic Land in December 2020 for the northern field within Site 7 and a decision is currently pending

(reference 20/11515/OUT). The submission of the Outline planning application demonstrates that the site is suitable, available, viable, and deliverable.

6.5 In addition, Gleeson are promoting land to the west of Site 7, at Titford Farm. We consider that there is an opportunity to connect Site 7 to this land and pursue a wider land assembly to the south of Westbury. This could enable a comprehensive strategy for residential development in Westbury.

[See attachment WEST031 for Appendix 1 - Map of SHELAA sites from Stage 1 of the Site Selection Process]

Rep ID: WEST032

Consultee code: Developer/Agent

Consultee Organisation (if applicable): Origin3

Is this response on behalf of someone else/another organisation? Yes

Organisation being represented (if applicable): Gleeson Strategic Land Ltd

Does this representation refer to attachment(s):
yes

If this representation refers to attachment(s), these are listed below:
WEST032

WE1. What do you think to the scale of growth? Should there be a brownfield target?

WE2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?

WE3. Is this the right pool of potential development sites?

WE4. What land do you think is the most appropriate upon which to build?

WE5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?

WE6. Are there any issues or infrastructure requirements that should be identified?

Further comments

Executive Summary

This representation to the Wiltshire Local Plan Review has been prepared by Origin3 on behalf of Gleeson Strategic Land Ltd (Gleeson). The statement has been written in respect of Titford Farm in Westbury. The site has also been submitted to the Council's Call for Sites.

Westbury is located within the Trowbridge Housing Market Area (HMA). The Emerging Spatial Strategy sets a housing requirement of between 40,840 and 45,630 new homes over the plan period of 2016 to 2036. The strategy sets out that 11,000 of these dwellings are required in the Trowbridge HMA. This is based on the higher housing figure which is informed by the need to provide homes to support jobs.

The approach of setting the higher housing requirement figures for the district and Trowbridge HMA is supported, however the plan period should be extended to a minimum of 15 years to 2038. This would result in an increased district housing requirement of a minimum of 50,192 dwellings, and an increased housing requirement of around 12,100 dwellings in Trowbridge HMA.

The most appropriate location for this increase in Trowbridge HMA housing requirement is considered to be Westbury. The sustainability appraisal has demonstrated that Westbury is the only main settlement in Trowbridge HMA that is able to accommodate an increased level of growth, and there are a number of sites being promoted that could be suitable for residential development.

In addition to Titford Farm, Gleeson are promoting land to the east at Land south of Sandhole Lane (Site 7 in the Planning for Westbury document). We consider that there is an opportunity to connect Site 7 to Titford Farm and pursue a wider land assembly to the south of Westbury. This could enable a comprehensive strategy for residential development in Westbury.

1 Introduction

1.1 This representation has been prepared by Origin3 on behalf of Gleeson Strategic Land Ltd (Gleeson) in respect of Titford Farm in Westbury as indicated on the plan below. The site has also been submitted to the Council's Call for Sites.

[See attachment WEST032 for Maps]

1.2 Wiltshire Council is undertaking a Local Plan Review. Between the 13th January 2021 and 9th March 2021, the Council are consulting on an Emerging Spatial Strategy for Wiltshire, including site allocation options for accommodating growth at Principal Settlements and Market Towns.

1.3 This representation is prepared to respond to the Wiltshire Local Plan Review consultation documents relating to Westbury, which comprise:

- Emerging Spatial Strategy
- Planning for Westbury
- Site Selection Report for Westbury
- Planning for Trowbridge
- Site Selection Report for Trowbridge

1.4 This representation is structured as follows:

- Section 2 provides a review of the overall housing requirement for Wiltshire.
- Section 3 reviews the Trowbridge Housing Market housing requirement.
- Section 4 considers the Trowbridge HMA emerging development strategy
- Section 5 considers the emerging allocation options in and around Westbury.
- Section 6 provides a conclusion.

2 Wiltshire Housing Requirement

5 Site Selection at Westbury

5.1 Westbury is identified as a Market Town within the Trowbridge Housing Market Area (HMA), with the potential for significant development that will increase the number of jobs and homes to help sustain/enhance services and facilities, and promote self-containment and sustainable communities.

5.2 The Planning for Westbury document and Site Selection Report how growth in Westbury is being planned, and which sites are being considered for allocation. Key priorities are set out comprising:

- Development should deliver well-designed homes, properly supported by infrastructure, to meet Westbury's needs.
- Development should contribute towards sustainable transport links (particularly walking and cycling routes) within the town and to the surrounding parishes and between the railway station, employment areas and the town centre.
- Develop a strategy for the regeneration of the town centre taking into consideration the emerging Westbury Town Plan, to encourage spending, improve accessibility, better manage traffic and parking and safeguard heritage assets.
- Development should contribute towards the improvement of air quality and support the Air Quality Management Area (AQMA) in Westbury town centre. It should address traffic issues in the town including consideration of, where appropriate, the route of the A350 through the town, including options for a bypass, and the need for a distributor road to relieve congestion on Oldfield Road.
- Development should deliver well thought out open spaces and landscaping to ensure residents can benefit from and enjoy their environment, regardless of whether they are on foot or using transport, and should link with other areas to allow easy access to all parts of the town.
- Retain existing employment areas and support their expansion to provide employment locally.

5.3 The Planning for Westbury report sets out that there are a number of sites being promoted around Westbury, and that the Council are assessing the development potential of a selected number of these sites. In total 12 sites have been identified for further assessment by the Council (see map in Appendix 1).

5.4 Titford Farm has not previously been promoted for residential development and is therefore not included in the sites identified by the Council. However, the adjacent land to the east of Titford Farm, referred to as Site 7 Land south of Sandhole Lane is being taken forward by the Council and is being promoted by Gleeson Strategic Land. Site 7 comprises SHELAA sites 622, 3337 and 3375.

5.5 An Outline planning application for the development of up to 67 homes at Land south of Sandhole Lane was submitted by Gleeson Strategic Land in December 2020 (the northern field within SHELAA site 622), and a decision is currently pending (reference 20/11515/OUT). The submission of the Outline planning application demonstrates that Site 7 is suitable, available, viable, and deliverable, and demonstrates that Gleeson Strategic Land are committed to enabling development on land to the south of Westbury including Titford Farm.

5.6 The Outline planning application (reference 20/11515/OUT) submitted at Land south of Sandhole Lane has included the potential for a link through the site to provide access to Titford Farm.

5.7 The Council have undertaken an initial review of Site 7 is included in the Site Selection report (see figure 5.1 below), and indicates that land to the south of Westbury is less constrained by landscape than other areas around Westbury.

5.8 We would also note that Site 7 and Titford Farm are less constrained by bat sensitivity zones than the northern edge of Westbury, and less constrained by flood risk and heritage than land to the west.

5.9 Titford Farm benefits from proximity to Dilton Marsh train station, which is located approximately a 15-20 minute walk or 5-10 minute cycle ride away.

5.10 We therefore consider that Titford Farm is a suitable location for residential development.

5.11 We request that the Council considers allocating Titford Farm for residential development to contribute to the housing requirement in Westbury.

5.12 In addition, Gleeson are promoting Site 7 Land south of Sandhole Lane, to the east of Titford Farm. We consider that there is an opportunity to connect Site 7 and Titford Farm and pursue a wider land assembly to the south of Westbury. This could enable a comprehensive strategy for residential development in Westbury.

[See attachment WEST032 for Tables]

6 Conclusion

6.1 In conclusion, we support the approach of integrating the strategy for housing with that of the economic development strategy, but consider that the plan period needs to cover a minimum 15 year period from adoption in accordance with the NPPF. The local plan should therefore be extended to at least 2038 and the number of dwellings required should be increased accordingly to at least 50,192 dwellings.

6.2 We support the approach of taking forward the higher housing requirement in the Trowbridge HMA, but this figure should be increased to a minimum of 12,100 dwellings to cover the minimum 15 year plan period to 2038.

6.3 The Council has identified through sustainability appraisal that Westbury is the only settlement in Trowbridge HMA that is able to accommodate a higher level of growth. We therefore consider that the additional housing requirement in Trowbridge HMA created by extending the plan period to 2038 should be directed to Westbury.

6.4 Titford Farm has not previously been promoted for residential development and is therefore not included in the sites identified by the Council. However, the adjacent land to the east of Titford Farm, referred to as Site 7 Land south of Sandhole Lane is being taken forward by the Council. An initial review of Site 7 by the Council indicates that land to the south of Westbury is less constrained by landscape than other areas around Westbury. We also note that Site 7 and Titford Farm are less constrained by bat sensitivity zones than the northern edge of Westbury, and less constrained by flood risk than land to the west.

6.5 We therefore consider that Titford Farm is a suitable location for residential development.

6.6 In addition, Gleeson are promoting Site 7 Land south of Sandhole Lane, to the east of Titford Farm. We consider that there is an opportunity to connect Site 7 and Titford Farm and pursue a wider land assembly to the south of Westbury. This could enable a comprehensive strategy for residential development in Westbury.

[See attachment WEST032 for Maps - Westbury Stage 1 SHELAA Sites]

Rep ID: WEST033

Consultee code: Developer/Agent

Consultee Organisation (if applicable): Origin3

Is this response on behalf of someone else/another organisation? Yes

Organisation being represented (if applicable): Gleeson Strategic Land Ltd

Does this representation refer to attachment(s):
yes

If this representation refers to attachment(s), these are listed below:
WEST033

WE1. What do you think to the scale of growth? Should there be a brownfield target?

WE2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?

WE3. Is this the right pool of potential development sites?

WE4. What land do you think is the most appropriate upon which to build?

WE5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?

WE6. Are there any issues or infrastructure requirements that should be identified?

Further comments

Executive Summary

This representation to the Wiltshire Local Plan Review has been prepared by Origin3 on behalf of Gleeson Strategic Land Ltd (Gleeson). The statement has been written in respect of Land south of Bratton Road in Westbury. The site has also been submitted to the Council's Call for Sites.

Westbury is located within the Trowbridge Housing Market Area (HMA). The Emerging Spatial Strategy sets a housing requirement of between 40,840 and 45,630 new homes over the plan period of 2016 to 2036. The strategy sets out that 11,000 of these dwellings are required in the Trowbridge HMA. This is based on the higher housing figure which is informed by the need to provide homes to support jobs.

The approach of setting the higher housing requirement figures for the district and Trowbridge HMA is supported, however the plan period should be extended to a minimum of 15 years to 2038. This would result in an increased district housing requirement of a minimum of 50,192 dwellings, and an increased housing requirement of around 12,100 dwellings in Trowbridge HMA.

The most appropriate location for this increase in Trowbridge HMA housing requirement is considered to be Westbury. The sustainability appraisal has demonstrated that Westbury is the only main settlement in Trowbridge HMA that is able to accommodate an increased level of growth, and there are a number of sites being promoted that could be suitable for residential development.

We consider that the Land south of Bratton Road offers the opportunity to allocate a large portion of the Westbury housing requirement in one location, rather than piecemeal development throughout Westbury. Land at Bratton Road should therefore be taken forward as a potential residential development site, and that a further review of considerations such as heritage and landscape should be undertaken.

The Land at Bratton Road is capable of achieving a sustainable access strategy to facilitate development on it and has locational benefits for sustainable travel such as walking and cycling. Land at Bratton Road also offers the opportunity for the Council to bring forward a future bypass at Westbury to alleviate air quality and traffic issues in the town centre. The site is large enough to be able to safeguard a future bypass route should this be a policy aspiration. If this is an aspiration then the Council should include a safeguarding policy for the provision of a bypass in Westbury in the Local Plan Review.

1 Introduction

[See attachment WEST033 for Maps]

1.2 Wiltshire Council is undertaking a Local Plan Review. Between the 13th January 2021 and 9th March 2021, the Council are consulting on an Emerging Spatial Strategy for Wiltshire, including site allocation options for accommodating growth at Principal Settlements and Market Towns.

1.3 This representation is prepared to respond to the Wiltshire Local Plan Review consultation documents relating to Westbury, which comprise:

- Emerging Spatial Strategy
- Planning for Westbury
- Site Selection Report for Westbury
- Planning for Trowbridge
- Site Selection Report for Trowbridge

1.4 This representation is structured as follows:

- Section 2 provides a review of the overall housing requirement for Wiltshire.
- Section 3 reviews the Trowbridge Housing Market housing requirement.
- Section 4 considers the Trowbridge HMA emerging development strategy
- Section 5 considers the emerging allocation options in and around Westbury.
- Section 6 provides a conclusion.

5 Site Selection at Westbury

5.1 Westbury is identified as a Market Town within the Trowbridge Housing Market Area (HMA), with the potential for significant development that will increase the number of jobs and homes to help sustain/enhance services and facilities, and promote self-containment and sustainable communities.

5.2 The Planning for Westbury document and Site Selection Report how growth in Westbury is being planned, and which sites are being considered for allocation. Key priorities are set out comprising:

- Development should deliver well-designed homes, properly supported by infrastructure, to meet Westbury's needs.
- Development should contribute towards sustainable transport links (particularly walking and cycling routes) within the town and to the surrounding parishes and between the railway station, employment areas and the town centre.
- Develop a strategy for the regeneration of the town centre taking into consideration the emerging Westbury Town Plan, to encourage spending, improve accessibility, better manage traffic and parking and safeguard heritage assets.
- Development should contribute towards the improvement of air quality and support the Air Quality Management Area (AQMA) in Westbury town centre. It should address traffic issues in the town including consideration of, where appropriate, the route of the A350 through the town, including options for a bypass, and the need for a distributor road to relieve congestion on Oldfield Road.
- Development should deliver well thought out open spaces and landscaping to ensure residents can benefit from and enjoy their environment, regardless of whether they are on foot or using transport, and should link with other areas to allow easy access to all parts of the town.
- Retain existing employment areas and support their expansion to provide employment locally.

5.3 The Planning for Westbury report sets out that there are a number of sites being promoted around Westbury, and that the Council are assessing the development potential of a selected number of these sites. In total 12 sites have been identified for further assessment by the Council (see map in Appendix 1).

5.4 Land south of Bratton Road has previously been submitted in a Call for Sites and is referenced in the Site Selection Report as SHELAA site 1012. An initial review of SHELAA sites has been undertaken in the Site Selection Report and the review of Bratton Road (1012) is provided below.

[See attachment WEST033 for Tables]

5.5 The Council have identified landscape and heritage considerations for the site, in particular relating to the adjacent cemetery, and Westbury White Horse to the east. Due to these landscape and heritage considerations the Council has determined that the site should be excluded from further review. However, we note that the Council recognises that further assessment would be required in relation to heritage and landscape, and that mitigation may be required should the site come forward for development.

5.6 The site benefits from potential access from both Bratton Road to the north and Newtown, and the Council has identified that the site has moderate accessibility and minimal surface water flood risk. We note that the Land at Bratton Road is less constrained by bat sensitivity zones than the northern edge of Westbury, and less constrained by flood risk than land to the west.

5.7 We consider that the Land south of Bratton Road should be taken forward as a potential residential development site, and that a further review of considerations such as heritage and landscape should be undertaken.

5.8 Land at Bratton Road offers the opportunity for the development of a larger site to contribute to the increased housing requirement at Westbury. This larger site offers the opportunity to focus the development of a number of homes in one location with any necessary infrastructure improvements, rather than piecemeal development on smaller sites across Westbury. Any landscape and heritage considerations at Land at Bratton Road could be mitigated through careful design.

5.9 Land at Bratton Road also offers the opportunity to accommodate a bypass for Westbury. Wiltshire Council have identified in the Planning for Westbury report that a key priority for Westbury should be the improvement of air quality and traffic issues to support the Air Quality Management Area (AQMA) in Westbury town centre. This includes consideration of options for a bypass.

5.10 The West Wiltshire District Plan 1st Alteration (adopted in 2004 and superseded by the Wiltshire Core Strategy on adoption in 2015, excluding specified Saved Policies), included a policy specific to the provision of a bypass at Westbury. Policy T1a: Westbury Bypass Package, stated:

T1a: Westbury Bypass Package: Land to the north and east of Westbury, from north of the existing Cement Works Roundabout and to the south of Madbrook Farm, as shown on the Proposals Map, is safeguarded as the County Council's preferred route option for the A350 Westbury Eastern Bypass and the Glenmore Link. Other development will not be permitted on this safeguarded land if it would be likely to prejudice the implementation of this scheme.

5.11 The location of the proposed bypass was included in the West Wiltshire District Plan 1st Alteration map of policies in Westbury (see Appendix 2). The proposed bypass location passed directly through the Land at Bratton Road.

5.12 Policy T1a: Westbury Bypass Package, was at first intended to be a Saved Policy and was included in the submission version of the Core Strategy in 2012. However, the Inspector's report dated 1st December 2014 replaced Policy T1a with Core Strategy Policy CP66: Strategic Road Network.

5.13 Given the Council's emphasis in the Local Plan Review of improving air quality and traffic in Westbury, we consider that the provision of a bypass in Westbury should be a key priority and specifically included as a policy.

5.14 The Land at Bratton Road would be instrumental to the provision of a bypass in Westbury and would provide access to and from the bypass from Westbury town centre. Residential development could be accommodated on the site alongside the bypass in a coordinated design approach.

6 Conclusion

6.1 In conclusion, we support the approach of integrating the strategy for housing with that of the economic development strategy, but consider that the plan period needs to cover a minimum 15 year period from adoption in accordance with the NPPF.

The local plan should therefore be extended to at least 2038 and the number of dwellings required should be increased accordingly to at least 50,192 dwellings.

6.2 We support the approach of taking forward the higher housing requirement in the Trowbridge HMA, but this figure should be increased to a minimum of 12,100 dwellings to cover the minimum 15 year plan period to 2038.

6.3 The Council has identified through sustainability appraisal that Westbury is the only settlement in Trowbridge HMA that is able to accommodate a higher level of growth. We therefore consider that the additional housing requirement in Trowbridge HMA created by extending the plan period to 2038 should be directed to Westbury.

6.4 We consider that the Land south of Bratton Road offers the opportunity to allocate a large portion of the Westbury housing requirement in one location, rather than piecemeal development throughout Westbury. Land at Bratton Road should therefore be taken forward as a potential residential development site, and that a further review of considerations such as heritage and landscape should be undertaken.

6.5 Land at Bratton Road also offers the opportunity for the Council to bring forward a bypass at Westbury to alleviate air quality and traffic issues in the town centre. The site is large enough to be able to safeguard a future bypass route should this be a policy aspiration. If this is an aspiration then the Council should include a safeguarding policy for the provision of a bypass in Westbury in the Local Plan Review.

[See attachment WEST033 for Maps - Appendix 1 - Westbury Stage 1 SHELAA Sites and Appendix 2 - West Wiltshire District Plan 1st Alteration Westbury Policy Map]

Rep ID: WEST034	
Consultee code: Developer/Agent	Consultee Organisation (if applicable): Blue Fox Planning
Is this response on behalf of someone else/another organisation? Yes	
Organisation being represented (if applicable): Persimmon Homes (Wessex) Ltd	
Does this representation refer to attachment(s): yes	If this representation refers to attachment(s), these are listed below: WEST034
WE1. What do you think to the scale of growth? Should there be a brownfield target?	
WE2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?	
WE3. Is this the right pool of potential development sites?	

WE4. What land do you think is the most appropriate upon which to build?

WE5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?

WE6. Are there any issues or infrastructure requirements that should be identified?

Further comments

1. Introduction

1.1 On behalf of our client, Persimmon Homes (Wessex) Ltd, Blue Fox Planning Ltd is instructed to submit representations in response to the March 2021 Wiltshire Council Local Plan Review public consultation.

1.2 The representations set out herein are focused on land controlled by Persimmon Homes at 'Land west of Mane Way', Westbury. This land comprises approximately 30 hectares and is identified in the most recent Wiltshire Strategic Housing and Economic Land Availability Assessment (SHELAA), site reference 3205 (Land to the west of Mane Way).

APPENDIX 1: SHELAA SITE 3205

1.3 In addition to SHELAA site 3205, Persimmon Homes has also submitted a planning application for development at Dartmoor Road, Westbury, planning application 20/06808/FUL, comprising a development of 26 dwellings. Additional land also controlled by Persimmon Homes is located at Fairdown Avenue, which was subject to a planning application in 2012 (Ref: W/12/02323/OUT).

1.4 As explained in the Westbury Site Selection Report, site 3205 is identified within the final pool of sites to be taken forward for further assessment. We set out specific details as to the suitability of this site within our representations at Section 4.

1.5 Westbury is categorised within the adopted Wiltshire Core Strategy as a Market Town which, alongside the Principal Settlements of Chippenham, Salisbury and Trowbridge, are the focus for growth over the current plan period 2006-2026. The status of Westbury as a Market Town is not proposed to be changed through the Local Plan Review process.

1.6 As explained in the Emerging Spatial Strategy Paper, Market Towns have the potential for significant development that will increase the number of jobs and homes and to help sustain and enhance services and facilities and promote self-containment and sustainable communities.

1.7 The proposed strategy for Westbury identifies a requirement to provide 1,820 dwellings over the plan period to 2036. Taking into account completions and planning commitments, there is a need identify sites to accommodate an additional 710 new homes.

1.8 The scale of growth set out in the preferred strategy is higher than the alternative options, in terms of rolling forward the current strategy (TR-A) and greater rural focus (TR-C). As a matter of principle, the approach to plan for higher levels of development at Westbury is broadly supported.

1.9 Our representations consider how the preferred strategy has been determined and whilst the approach to Westbury is positive and consistent with the capacity of this settlement to accommodate growth at higher levels than the current strategy, we raise some concerns regarding how the figure of 1,820 has been derived.

1.10 The reasonable alternative option of the Westbury Growth Point (TR-B) identifies a requirement of 2,130 dwellings over the plan period. It is explained in the supporting documents that the level of growth at Westbury is moderated, based principally on concerns related to traffic congestion and air quality. However, there is no specific explanation as to why a figure of 1,820 dwellings represents the most appropriate strategy. It appears to be somewhat arbitrary and not supported by any specific evidence.

1.11 In this context we also consider the Interim Sustainability Appraisal (SA) and note that of all the reasonable alternatives presented, including the emerging preferred strategy, there is very little difference in terms of sustainability effects of the alternatives considered. This reinforces our concerns as to how the final scale of development for Westbury has been determined.

1.12 We support the decision for site 3205 to be taken forward for further detailed assessment and consider that this site provides a logical and suitable development opportunity to support the strategy for growth at Westbury.

4. Land to the West of Mane Way, Westbury

4.1 As set out previously, Persimmon Homes (Wessex) Ltd controls land which identified in the current SHELAA (site ref: 3205) and is listed within the final pool of sites that will be taken forward for further assessment.

4.2 The most recent Wiltshire SHELAA concluded that this site option is suitable, achievable, available, and deliverable. We can confirm on behalf of Persimmon Homes, that this site is under the control of a national house builder and there are no known land ownership or legal constraints that would impact on the ability of this site to be delivered.

4.3 We support the recognition with the Westbury Site Selection Report that there does not appear to be any overriding significant impacts that would justify excluding this site at this stage.

4.4 In support of our representations a high-level concept plan has been prepared (Appendix 2) which is intended to articulate the constraints and opportunities present at this location. This is provided at Appendix 2.

APPENDIX 2: LAND WEST OF MANE WAY

CONCEPT PLAN

APPENDIX 3: LAND WEST OF MANE WAY CONSTRAINTS AND OPPORTUNITIES PLAN

4.5 The Concept Plan submitted as part of our representations demonstrates how the site is capable of responding appropriately to identified constraints, including flood zones and heritage assets. Moreover, the site lies outside of either the Red or Yellow Zone as identified in the Trowbridge Bat Mitigation Strategy, unlike alternative development options to the north of the town.

4.6 Through this process of identifying the opportunities and constraints, it is considered that land west of Mane Way has the capacity to accommodate approximately 300 new homes and therefore can make a significant contribution to housing delivery at Westbury.

4.7 The high-level assessment set out in the Westbury Site Selection Report and the assessment table has been considered in preparation of the Constraints and Opportunities plan. In particular, matters related to heritage where the Constraints and Opportunities Plan is informed by an initial assessment of the significance of heritage assets and their relationship to the site. This is set out below, along with a summary of work undertaken to date in respect of landscape and accessibility.

Heritage

4.8 As noted in the Site Selection Report, site 3205 contains a scheduled ancient monument, with a number a of listed buildings located beyond the western boundary. Therefore, it is recognised that any development of the site must have careful regard to the setting of these heritage assets, seek to minimise any harm, and take opportunities to enhance their significance where possible.

4.9 Development proposals will be responsive to both the constraints and opportunities to preserve the key elements of the setting and significance of the heritage assets, and also provide some enhancements to the appreciation of their significance. In doing so, supporting a development pattern that does not result in unacceptable effects to the assets.

4.10 Such measures can be readily secured via the planning process, and through a collaborative approach with Wiltshire Heritage and Archaeology Officers, and Historic England, this can ensure that future development proposals provide an appropriate response to the significance of heritage assets that relate to this site.

Accessibility

4.11 The 'Constraints Plan' at Appendix 3 identifies a potential vehicular access strategy that incorporates the use of two priority T-junctions to serve the separate elements of the development area. These junctions have been evaluated to provide confidence that they could be delivered in accordance with current design requirements, including the need to provide visibility sightlines.

4.12 Preliminary studies have been undertaken to assess the opportunities and constraints from the point of integrating development at this location with existing non-car travel infrastructure, to support the Council's vision of providing the right homes in the right locations, reducing the need to travel by car and promoting active and healthy travel options.

4.13 The results are contained on the Calibro plan at Appendix 4 which shows the site to offer significant non-car opportunities. In particular, the assessment confirms that the over-whelming majority of the built-up areas of Westbury is within a 10-minute cycle journey of the site, and within which an array of local amenities exist, including the railway station, local primary and secondary schools, and the town centre.

APPENDIX 4: TRAVEL INTEGRATION STRATEGY

4.14 The site provides an opportunity to enhance existing cycle routes in the area, particularly Penleigh Road which is a key strategic link that connects to the National Cycle Network in the west. Indeed, development proposals could facilitate an upgrade of the surface of Penleigh Road whilst the development itself could be designed to increase natural surveillance along the route.

4.15 Development at this location has the potential to better accommodate desire lines between Westbury Railway Station to the northeast and the residential areas abutting Mane Road, and to the south. In particular, the site includes land that would be required to deliver a new bridge over the railway line which is an aspiration of Wiltshire Council.

4.16 Land to the west of Mane Way is considered to be a natural expansion of Westbury that offers significant opportunities for active and healthy travel to a plethora of local facilities, in a way that can integrate with the existing community.

4.17 There are no abnormal transport / highways constraints that could frustrate the delivery of new housing in this location.

Landscape

4.18 In preparing the Concept Plan (Appendix 1) a Landscape and Visual baseline study has been undertaken. This confirms that the site and local area are not covered by any landscape designations.

4.19 The area contains a range of urban influences, which detract from the agricultural landscape that covers the site. The site is entirely surrounded by non-agricultural land uses and the transport routes and nearby industrial areas disturb the tranquillity and visual cohesion of the site and its surroundings.

4.20 The site contains a Scheduled Monument and a relatively complete hedgerow structure with watercourses and ponds. Off-site the Biss Brook river corridor separates the site from the hamlet of Penleigh and the listed structures at Penleigh House, Penleigh Farm and Penleigh Mill House, which are either well-screened or partially filtered from the site.

4.21 The Concept Plan has taken on board the initial landscape assessment in order to demonstrate how development can be accommodated in a manner which is sensitive and responsive to its landscape setting.

5. Conclusions and Recommendations

5.1 On behalf of our client, Persimmon Homes (Wessex) Ltd, we welcome the opportunity to submit representations in response to the Wiltshire Council Local Plan Review. Our representations consider the proposed strategy for Westbury as part of the Trowbridge Housing Market Area (HMA).

5.2 Our representations are also concerned with land west of Mane Way (Westbury) which is identified within the final pool of sites that will be taken forward for further assessment. We support this decision and note the acknowledgement within the supporting documentation, including the Sustainability Appraisal, that Westbury is the least constrained, in environmental terms of all the settlements within the HMA.

5.3 In support of our representations a Constraints and Opportunities plan has been prepared which is intended to demonstrate how development could be accommodated at the Mane Way site, based on the known constraints to development. In preparing this plan, we have had regard to the high-level assessment set out in the Westbury Site Selection Report.

5.4 For reasons set out in Section 4 of our representations, land west of Mane Way, provides a logical and coherent development opportunity. We reiterate and support the findings of the most recent SHELAA, where it concluded that this site is suitable, achievable, available and deliverable.

5.5 It is evident from the assessments undertaken in preparation of this current consultation, alongside additional information submitted as part of these representations, that the decision to take this site forward for further assessment is justified.

5.6 We support the recognition within the Planning for Westbury paper that this settlement is capable of accommodating rates of development which are higher than the reasonable alternative of rolling forward the current strategy. Past completions rates referenced within our representations demonstrate that Westbury has successfully accommodated scales of development above the WCS requirement.

5.7 The proposed strategy is based on a requirement of 1,820 dwellings which is below the reasonable alternative option of the Westbury Growth Point (TR-B). It is understood that growth is moderated due to concerns regarding traffic congestion and air quality, but there is no specific detail to demonstrate how the figure of 1,820 has been determined as the appropriate rate of development for Westbury.

5.8 Greater clarity is required on this specific matter in order to ensure that the growth potential of Westbury has not been artificially constrained by an arbitrary reduction from the TR-B reasonable alternative.

5.9 Within this HMA it is recognised that Trowbridge is highly constrained, resulting in a downward adjustment to the scale of development that is to be provided. We set out in our separate representations on Planning for Trowbridge, that wider opportunities for development should be maximised at the town, including land allocated, but undeveloped for other uses, to contribute to housing delivery.

5.10 The reasonable alternative of the Westbury Growth Point (TR-B) is supported as a logical approach to the challenges of housing delivery in this HMA and those associated with Trowbridge. Therefore, we also consider that sustainable development opportunities at Westbury, including land west of Mane Way (site 3205), should be maximised as a key component of the growth strategy for this HMA.

[See attachment WEST034 for Appendix 1 - SHELAA Site 3205; Appendix 2 - Concept Plan; Appendix 3 - Constraints and Opportunities Plan; Appendix 4 - Travel Integration Strategy

Rep ID: WEST035	
Consultee code: Developer/Agent	Consultee Organisation (if applicable): Boyer Planning
Is this response on behalf of someone else/another organisation? Yes	
Organisation being represented (if applicable): Westbury LVA LLP	
Does this representation refer to attachment(s): yes	If this representation refers to attachment(s), these are listed below: WEST035
WE1. What do you think to the scale of growth? Should there be a brownfield target?	
<p>The Alternative Development Strategies (ADSs) document for the Trowbridge HMA broadly identifies that, of the four main settlements in this HMA, Westbury has the most environmental capacity, infrastructure capacity and land availability. With Trowbridge, despite being the principal settlement in the HMA, the population distribution and affordable housing need comparisons suggest less development should take here, compared with the current development plan.</p> <p>The Emerging Spatial Strategy (ESS) therefore proposes “a significantly higher scale of growth at Westbury” compared with the existing development plan. Compared with the Core Strategy requirement of 1,500 homes at Westbury over a 20 year plan period, the ESS proposes a new requirement of 1,820 over the plan period. This equates to an increase of an additional 16 dpa at Westbury, which we do not consider is enough.</p> <p>Given Trowbridge’s role as a principal settlement and the functional relationship and proximity of Trowbridge with Westbury, we do not consider there to have been enough of a shift towards growth here, despite the claim of “much higher rates of development” in the ESS. Stretched over the plan period and based on the evidence supporting the ESS, there appears to be</p>	

environmental capacity and land availability to warrant Westbury accommodating all of Trowbridge's reduction in growth. We would support an overall housing requirement of 1,990 for Westbury, with Bradford on Avon, Warminster and the rest of the HMA all being adjusted down accordingly. This would not be unmanageable as insinuated in paragraph 3.84 of the ESS.

Given recent under-delivery in Trowbridge and the constraint of the Bradford on Avon bats SAC, we feel there could be a case to distribute even more of the HMA's requirement outside of the town – particularly in the direction of Westbury given its proximity and relationship with Trowbridge.

As discussed in our response to the ESS, there is no clear benefit to the introduction of brownfield targets in the LPR and it is our view that the Council should focus on thorough assessment of the availability and deliverability of brownfield candidate site opportunities. This is the mechanism to manage the proportion of greenfield sites that are allocated. The ESS recognises that greenfield sites achieve more certainty over delivery and that this is the thrust of national planning policy. Clearly, a large proportion of development in Wiltshire will need to be on greenfield sites in order for the Plan's strategic polices to be deliverable and therefore sound. This applies at a settlement level to Westbury.

WE2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?

If used correctly and consistently, the place shaping priorities have the potential to ensure sustainable development for Wiltshire. For place shaping priorities to truly be achieved potential development sites should be clearly assessed against how they satisfy and/or contribute to each of the priorities, as well as Sustainability Appraisal (SA) objectives.

They place shaping priorities aren't all very place specific. For example, priority i is very high level and would be fundamental to any Local Plan.

In terms of how these place shaping priorities are achieved, we consider that the best strategy would be to employ a spatial approach that focusses on Westbury train station and sustainable connectivity to it. Traffic and air quality issues are the key constraints to growth in the town and a rail-focussed spatial strategy would be an effective way to achieve the level of growth required in a sustainable way.

We note local aspirations for a bypass, but question the deliverability and viability of this given the proposed number of homes for allocation is up to 710. Furthermore, this is ultimately a private car led solution to a problem caused by existing high levels of private car use. As suggested, a focus on the north of the town and the train station would be more sustainable.

WE3. Is this the right pool of potential development sites?

Generally we are supportive of the final pool of potential development sites as set out in the Planning for Westbury document and believe that a number of those listed are appropriate and necessary to meet the scales of growth and the priorities for Westbury of the plan period. We believe that Site 2, in particular land at Glenmore Farm (SHELAA site 1014), is the most appropriate site to contribute to Westbury's requirement for a further 710 homes.

Notwithstanding our broad support for the site options, clearly some align more closely with Westbury's place shaping priorities than others. Those sites located south of the railway lines (Sites 4-12) are not thought to satisfy place shaping priorities ii and iv (sustainable transport and air quality). Particular thought should be given to the Air Quality Management Area (AQMA) in Westbury town centre and that development here would be detrimental to the management area by contributing negatively to the deterioration in air quality through exacerbation of existing traffic problems. Sites north of the railway lines (Sites 1-3) have direct vehicular access to the main nearby urban centres of Frome, Trowbridge and Bath without having to pass through the AQMA. Equally, they have excellent access to Westbury train station.

The Stage 2 assessment of SHELAA sites is still very high level and utilises broad assessment criteria applicable to all sites being considered in Wiltshire. Page 8 of the Site Selection report notes this as Stage '2A'. Stage '2B' takes account of the strategic context for Westbury and the Council have exercised judgement on whether to take sites forward for consideration, combined with their Stage 2A traffic light scores.

While we agree that it is appropriate for SHELAA 1014 to be taken forward, we are concerned over the relevance of commentary within the 'overall judgement'. For example, it is noted that the site may "erode the separation of the residential area to the south and employment land to the north". This is phrased negatively without explanation or justification. There is no established policy requirement for separation of employment land and housing, and in fact the nature of the site's surroundings mean it is well screened (which is actually acknowledged in the document) and is not likely to lead to any significant landscape impacts. Its location bounded by development to the north and south is a positive characteristic of the site.

In order to demonstrate the opportunity presented by the Land at Glenmore Farm, we have prepared a Position Statement which summarises the findings of a full suite of technical assessment work and succinctly assesses the site's suitability, availability and achievability. The Position Statement accompanies these representations.

WE4. What land do you think is the most appropriate upon which to build?

Whilst the Planning for Westbury document identifies a need for further employment land at Westbury over and above that of which is already allocated in the Local Plan, the main priority should be for residential development to satisfy the housing requirement.

We consider Site 2 (and in particular SHELAA 1014) as stated in the Site Selection Report for Westbury, to be the most appropriate for residential development in Westbury. In particular the site addresses place shaping priority iv in that its location outside of Westbury town centre signifies its positive contribution in supporting the AQMA which focuses on the town centre in particular. The sites proximity to Westbury train station also encourages sustainable transport and presents an opportunity to overcome air quality and traffic issues which Westbury currently faces. Given Wiltshire Council has acknowledged a climate emergency, we believe growth should focus on access to Westbury train station primarily via walking, but also cycling. This (arguably underutilised) significant existing piece of sustainable transport infrastructure should form a key component of Westbury's growth strategy.

While it may seem logical to group SHELAA sites together to form Site Options, we would like to clarify that SHELAA 1014 (Glenmore Farm) is not reliant on either SHELAA 742 or 883375 in order to be delivered. The Land at Glenmore Farm is within the control of LVA and a planning application is due to be submitted in March 2021. Any issues around suitability, deliverability or viability with the adjoining two sites should not inhibit allocation of site 1014. In other words, Site 2 should not be considered as 'all or nothing'.

The illustrative masterplan for the proposed development at Glenmore Farm demonstrates how the site can be successfully delivered and exhibits the proposed delivery of green infrastructure composed of a village green, public open space, green streets, orchards and extensive landscape and ecological enhancements. Planting along the boundary of the site is proposed will add character to the site and also create an attractive boundary to the open countryside, whilst addressing concerns detailed in the site selection report of the impact on near views.

WE5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?

SHELAA site 1014 has been assessed as amber for flood risk in the Stage 2A assessment due to groundwater flood risk. However, this issue has been fully assessed as part of the Flood Risk Assessment and Drainage Strategy prepared by Trace Design in support of the site's promotion for development (see technical summaries contained within the submitted Position Statement). This risk can be fully mitigated and has been incorporated into the design of the illustrative scheme.

WE6. Are there any issues or infrastructure requirements that should be identified?

To support the climate emergency, traffic and air quality issues, the focus for infrastructure should be accessibility to the train station.

Further comments

Please see submitted WEST35a - Position Statement (Land at Glenmore Farm).

Neighbourhood Plans

As a main town, we are of the view that the housing requirement for Westbury should be planned for entirely through the Local Plan Review. The role of Neighbourhood Plans should be to “allocate sites for development, for example, that meet a particular local housing need, e.g. an identified need for self-build homes or affordable housing, or development that provides particular community benefits.”

Westbury as a settlement is covered by the Parishes of Westbury Town, Heywood and Dilton Marsh. There is no requirement for Neighbourhood Plans to be made and therefore we would oppose any ‘delegation’ of housing numbers to emerging Neighbourhood Plans.

Rep ID: WEST036

Consultee code: General Public

Consultee Organisation (if applicable): n/a

Is this response on behalf of someone else/another organisation? No

Organisation being represented (if applicable):

Does this representation refer to attachment(s):
yes

If this representation refers to attachment(s), these are listed below:
WEST036

WE1. What do you think to the scale of growth? Should there be a brownfield target?

WE2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?

WE3. Is this the right pool of potential development sites?

I wish to comment on some of the sites being proposed for allocation for residential development. Please accept this e-mail as my duly-made representation.

Site 1 (Land North of Shallow Waggon Lane - SHELAA site 3445)

Site 1 has no significant planning history for residential development (but was to be the site of a junction on the Glenmore Link of the A350 Westbury Bypass), but the text in the consultation document omits to mention its considerable archaeological importance. The A350 Westbury Bypass archaeological reports confirmed that most of it was within the Romano-British settlement of "Old Westbury". In my view, it is far too important to be destroyed by residential development.

I have set out the position in many previous e-mails relating to planning applications in the vicinity (including the Solar Farm - W/12/02081/FUL), but most recently in respect of the withdrawn Glenmore Farm proposals (15/07071/OUT) and I have attached those comments (see documents 640629 and 643764).

Site 2 (Land Southeast of the West Wilts Trading Estate, land at Glenmore Farm and land off Storridge Road - SHELAA sites 742, 1014 and 883375).

Site 2 has a great deal of planning history including two refused planning applications by Gladman on the Corp Land (17/12342/OUT refused 6 July 2018 and 19/06389/OUT refused 17 January 2020, for eight reasons) and the withdrawn planning application by Taylor Wimpey (15/07071/OUT). The best summary of the case against the Corp Land is the Case Officer's Report itself on the second Gladman application (see attached document 1358222). Unfortunately, no Case Officer's Report was ever published on the Taylor Wimpey application, but several of the consultee responses were decidedly adverse to it, and included a strong highway objection due to the substandard visibility splays proposed at the sole vehicular access and inadequate other accesses for cyclists and pedestrians.

A major geological fault (known as the Heywood Fault) crosses the site and passes directly under the existing Glenmore Farmhouse.

Site 3 (Land at Slag Lane - SHELAA site 3218)

I draw your attention to Appendix D (Saved policies) of the Wiltshire Core Strategy confirming that policy U5 (Sewage Treatment Works Buffer Zone) of the West Wiltshire District Plan 1st Alteration- Adopted June 2004 remains a saved policy in the Development Plan, and prevents any residential development on this site.

Site 6 (Chalford Gardens - SHELAA site 251, 1011)

The name attributed to Site 6 is highly misleading as it includes the Wellhead woods and the former Beresmere Farm and stretches right across the green lane and the Wellhead valley to the edge of White Scar Hanging (probably ancient woodland of native species, including beech and oak). All or almost all of Site 6 is within the Special Landscape Area, which is protected from residential development by another saved policy in Appendix D of the Wiltshire Core Strategy (viz. saved policy C3 of the West Wiltshire District Plan 1st Alteration- Adopted June 2004). Residential development of Site 6 would also obstruct any future A350 Westbury Bypass along the most cost-effective and least environmentally damaging route available.

Site 9 (Land at Leigh Park - SHELAA site 268)

The western and southwestern portions of Site 9 encroach unacceptably into the area of open land once designated as the Rural Buffer Zone protecting Dilton Marsh from coalescence with Westbury.

Site 10 (Land to the west of Mane Way - SHELAA site 3205)

It seems certain that rather little of the large areas shown as within Flood Zone 2 & 3 will not be developed if included within the site allocation area, so the capacity of this site is far larger than estimated by Wiltshire Council. All or almost all of the southern portion of the site remains contaminated land as a result of the works carried out to bury cyanide and heavy metal residues/tailings remaining at the former Charles Case tannery. Hence Core Policy 56 of the Wiltshire Core Strategy is applicable.

The area of amenity land east of the proposed extension of Mane Way over the railway (Westbury avoiding line) was once part of the Oldfield Park Recreation Ground (now a designated town green) and ought not to be handed back to developers for residential development.

Site 11 (Land at Redland Lane - SHELAA site 269)

This site is reputed to have the finest and best outdoor sports ground playing surface in Westbury, and it is unacceptable for it to be lost to residential development (see the relevant NPPF policies and DoE guidance).

WE4. What land do you think is the most appropriate upon which to build?

WE5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?

WE6. Are there any issues or infrastructure requirements that should be identified?

Further comments

See attachment WEST036 for copies of planning applications and correspondence referred to in these comments.

Rep ID: WEST037	
Consultee code: Developer/Agent	Consultee Organisation (if applicable): Dandara Ltd
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): yes	If this representation refers to attachment(s), these are listed below: WEST037
WE1. What do you think to the scale of growth? Should there be a brownfield target?	
WE2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?	
WE3. Is this the right pool of potential development sites?	

WE4. What land do you think is the most appropriate upon which to build?

WE5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?

WE6. Are there any issues or infrastructure requirements that should be identified?

Further comments

The following representations are submitted in regard to the Council's Emerging Spatial Strategy and Planning for Westbury document. Representations are specific to Hawke Ridge Business Park and are submitted by Dandara in association with the landowners, HPH Commercial Property.

The Council's 2018 Employment Land Review is relied on to inform the Emerging Spatial Strategy in regard the distribution of employment land around the County. The Strategy is to allocate land to ensure the scale of the County's employment needs are met and to ensure a supply of deliverable land. Studies of employment needs for the plan period result in a forecast requirement to plan for an additional 1ha of land for business within the Trowbridge Housing Market Area however the Strategy confirms there is already a large supply of land available for business throughout the County. The Wiltshire Core Strategy identified and allocated a significant supply of land for employment needs. The scale of supply far exceeded forecast need in order to provide a good choice of sites and flexibility (Emerging Spatial Strategy p.11).

14.7ha of land at Mill Lane, Hawke Ridge, Westbury was allocated in Wiltshire's 2015 Core Strategy to provide new employment land for a mix of B class uses through a high-quality business park. Outline planning permission for the formation of the new business park (Class B1, B2 and B8), access and associated works was granted in September 2014. Subsequent to the grant of outline planning permission, two reserved matters planning permissions were granted by the Council along with a full application for roadside uses, including a convenience retail store. The access, drainage infrastructure and peripheral landscaping were subsequently implemented in 2016 – 2017. The site lies equidistant between Trowbridge and Westbury on an existing bus route. It is also in close proximity to existing employment opportunities at the West Wiltshire Trading Estate & Northacre Park. The business park has been marketed since 2011. During this time various prospective investors and local firms have expressed some interest in the site but no proceedable offers have been forthcoming. No offer has ever been made for purchase of the entire site. The longstanding marketing process has confirmed that the site is not viable for employment purposes for the following reasons:

- Mid-Wiltshire does not benefit from a good range of innovative industries having high end value products justifying efficient modern accommodation. Typically, local companies can operate effectively from ageing buildings and are unable to pay the uplift necessary to afford new build.
- Consistent availability of second-hand accommodation (often refurbished) undercuts the need for new accommodation.
- Reluctance of small space occupiers to commit to a deal until the accommodation is constructed.
- Occupiers often build up significant dilapidation costs in their existing accommodation which are frequently waived if they remain in the same premises on lease renewal thus trapping them from relocating.
- The approval by Wiltshire Council of speculative employment sites which have not been promoted through development plan-making processes. This has undermined the potential for the business park to attract occupiers by diluting demand: e.g. Hitachi Capital – Yarnbrook, Chippenham Gateway and Pound Farm – Yarnbrook.
- Lack of new large space requirements suitable for mid-Wiltshire other than original 5 to 6 known requirements back in 2013 – 2015.
- Reluctance of Trowbridge/ Melksham/ Warminster occupiers to relocate to Westbury. It is clear that Westbury does not act as a source of employment land for Trowbridge and is not seen as such by Trowbridge occupiers.
- The business park is not an office location. Such requirements for B1 space look to Trowbridge and Chippenham town centres.
- The business park is not recognised as a logistics location and does not fit into current logistics models.
- Construction costs and current leasehold rentals and freehold purchase values render development of new industrial units unviable.

Despite significant investment into Hawke Ridge Business Park, total employment in Westbury has stagnated since 2009 (Wiltshire Employment Land Review, p.17). It can be clearly demonstrated (with marketing evidence stretching over 10 years) that the site is not viable for large scale employment use.

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 (Emerging Spatial Strategy p.11). NPPF paragraph 120 reads;

‘Planning policies and decisions need to reflect changes in the demand for land. They should be informed by regular reviews of both the land allocated for development in plans, and of land availability. Where both the local planning authority considers there to be no reasonable prospect of an application coming forward for the use allocated in the plan:

- a) they should, as part of plan updates, reallocate the land for a more deliverable use that can help to address identified needs (or, if appropriate, deallocate a site which is undeveloped); and
- b) in the interim, prior to updating the plan, applications for alternative uses on the land should be supported, where the proposed use would contribute to meeting an unmet need for development in the area.’

Hawke Ridge is a Principal Employment Area and strategic employment allocation in the existing Wiltshire Core Strategy (2015). Core Policy 35 allows for the redevelopment of Principal Employment Areas providing there is valid evidence the site has no long term and strategic requirement to remain in employment use; the ability of the site to meet modern business needs must be considered, as well as its strategic value and contribution to the local and wider economy both currently and in the long term. It must be shown that the site is no longer viable for its present or any other employment use and that, in addition, it has remained unsold or un-let for a substantial period of time (at least 6 months), following genuine and sustained attempts to sell or let it on reasonable terms for employment use, taking into account prevailing market conditions.

The Council’s Employment Land Review confirms changes of use should be firmly resisted unless there is ‘compelling’ evidence that a site is not suitable or needed for employment uses. In this context ‘compelling’ evidence that a site is not suitable or needed for employment uses would need to include:

- A detailed property market report prepared by a reputable commercial property agency detailing the marketing activities sustained over a period of time - probably a minimum of five years – including the responses/enquiries received, terms quoted, feedback from potential occupiers, and a commentary on potential demand from owner-occupiers. The marketing report should include:

- Evidence of marketing material, including adverts on e.g. CoStar, and Estates Gazette
- Listed responses/enquiries received and feedback detailing why the site in question was not suitable for businesses requirements/employment use
- Evidence of a visible for sale or letting board on the land or property throughout the period of marketing
- Quoting terms/details on leasehold and freehold purchase options, reflecting market conditions.

- Details of a marketing strategy including how it has been refreshed regularly to adapt to changing market conditions, opportunities, and constraints
 - Details of any ownership, infrastructure or other barriers which make the site undeliverable for employment uses Evidence to demonstrate that the removal of an allocated site would not leave a shortfall or lack of choice in the amount of allocated employment land as identified in the 2018 Employment Land Review.
 - Evidence that there is no long-term requirement for the site to remain in employment uses (including for example, the impact of removal of the site on local supply, detailed evidence on site viability, evidence that a range of B Uses and other policy compliant employment generating uses have been explored for the site, and an analysis of take-up data) (Wiltshire Employment Land Review, p.55).

The described 'compelling' evidence has been provided to the Council by separate cover. Given the commercially sensitive nature of the information, the evidence is not supplied again here. Evidence shows that many sites which were previously allocated and reviewed in the 2011 Employment Land Review have not been delivered and analysis of the current supply of employment sites shows that around half of the available supply is at risk of non-delivery (Wiltshire Employment Land Review, p.62). In this case, the de-allocation of employment sites, and allocation for other uses, should be considered. If there is no reasonable prospect of delivering a proposal within the plan period then it should be deleted or amended through the formal Local Plan review process (Wiltshire Employment Land Review, p.67). Developers will need to demonstrate there are material considerations that set aside the policies and proposals of the development plan if they are seeking to use a site allocation for different uses to those set out. They will need to show:

- 'Compelling' evidence that a site is not suitable or needed for employment uses
- Constraints on their development that would limit their development potential for employment uses (Wiltshire Employment Land Review, p.67)

Such evidence has already been provided regards Hawke Ridge.

Despite many meetings between the landowners and the Council's economic development officers it has never been clear what type of industries and businesses the local authority hope to attract to Westbury. This question was asked at the recent Westbury local plan forum though a public response is yet to be made. It was suggested in the same forum that the allocation of employment land for Westbury in the 2016 Core Strategy was an over allocation. That has been the experience of both HPH Commercial Property and Wiltshire Council and is reflected in the Emerging Spatial Strategy (p.11). HPH Ltd can confirm no occupier interest has been received from referral by Wiltshire Council in the past 6 years. Interest has been direct or via agents and several proposals have been made to a variety of businesses. In the face of competition from sites not allocated in the Core Strategy for employment use which have either been granted consent, or not discouraged from seeking consent, together with Wiltshire Council owned land HPH Ltd. have continued to market the site in an adverse environment.

Whilst the Business Park was allocated in the core strategy as a strategic employment site for large space users the experience of over 10 years of marketing has been that such occupiers who need large floorplate buildings, in excess of 100,000 sq. ft. with generous yard areas and good accessibility have sought out motorway locations along the M4 and M5 and occasionally the A303. Recognising this, Wiltshire Council have released sites for employment use not identified in the Core Strategy. Hawke Ridge cannot compete for these requirements which are fuelled particularly by the consolidation of logistics operations and the growth in eCommerce. It is this sector which has experienced the high growth in demand and values which has subsequently resulted in development of large floorplate buildings in Swindon, Bristol and Avonmouth. Even towns as close as Melksham have seen demand stimulated by shorter travel distances to the motorway network and again the Council has promoted and marketed a site in competition with Hawke Ridge Business Park.

There have been fluctuations in demand for industrial accommodation in the Westbury area and demand currently remains weak for new build industrial units (Wiltshire Employment Land Review, p.17). The enquiries that Hawke Ridge Business Park has generated emanate principally from small and medium sized enterprises including those in the packaging, food and motor industries. These companies operate effectively from second-hand accommodation for which rents which do not exceed £6.50 per sq. ft whereas a minimum of £7.50 per sq. ft. is required for development viability at Hawke Ridge in this size range. The significant increase in cost for new build accommodation for these businesses is not justified by the potential value-added by a new building for the business operation.

There are a number of reasons why occupiers have yet to be found however three themes recur and these are the issue of affordability, the fact that Hawke Ridge is not a location suited for large scale logistics and the lack of occupiers prepared to commit to new accommodation for whom the additional cost can be justified by the value added.

It is evident that the Business Park catchment does not include the types of company who can afford new- build accommodation at prevailing rates, the few logistics and distribution enquiries who could afford new- build generally locate close to motorway locations. This leaves Hawke Ridge capable of attracting only manufacturing occupiers or locally based SMEs who to date have not been able to sustain the capital values and rents necessary to make new construction viable.

As informed by the extensive marketing evidence, the development of the business park for employment uses is clearly not credible and given the allocation, the planning history, the established access, the NPPF and Wiltshire Core Strategy positions, it is right to consider alternative uses for the land.

As it is evidenced that there is no reasonable prospect of the land fulfilling its allocated purpose for employment led development, a review of the strategic allocation at Hawke Ridge is necessary. The principle of development of the business park is established as acceptable. The site is sustainably located, accessible and its development has already been found to be acceptable in regard to landscape, ecological and highway impact. The site is fully serviced in terms of infrastructure and benefits from broadband connectivity with substantial bandwidth available from both Virgin Media and BT Openreach. It now will provide good

infrastructure for residential properties and a facility needed for good home working and home ecommerce making it sustainable and connected for home ordering and deliveries which Covid-19 has made essential.

The emerging strategy for Westbury identifies a requirement for 1,820 new homes for the plan period 2016- 2036 with 710 of that number not under construction or 'in the pipeline' (Planning for Westbury, p. 3). It is suggested that the land most appropriate for development would consist of that for which the principle has already been established. There is demonstrable local need for land for the development of early years education provision and a 3G Artificial Turf Pitch locally, discussions regards how both might be provided for at Hawke Ridge are welcomed.

We would encourage the Council to demonstrate the flexibility it identifies is required in considering the clear evidence that the delivery of Hawke Ridge as proposed in the Core Strategy is without reasonable prospect. As acknowledged, the scale of supply within the Core Strategy far exceeded forecast need in order to provide a good choice of sites and flexibility (Emerging Spatial Strategy p.11). However, total employment in Westbury has stagnated since 2009 (Wiltshire Employment Land Review, p.17), and with no reasonable prospect of delivering the proposal it should be amended through the formal Local Plan review process (Wiltshire Employment Land Review, p.67).

We look forward to discussing the future of the site.

Rep ID: WEST038

Consultee code: Statutory Body

Consultee Organisation (if applicable): Natural England

Is this response on behalf of someone else/another organisation? No

Organisation being represented (if applicable):

Does this representation refer to attachment(s):
yes

If this representation refers to attachment(s), these are listed below:
WEST038

WE1. What do you think to the scale of growth? Should there be a brownfield target?

WE2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?

WE3. Is this the right pool of potential development sites?

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.

WE4. What land do you think is the most appropriate upon which to build?

WE5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?

WE6. Are there any issues or infrastructure requirements that should be identified?

Further comments

Rep ID: WEST039

Consultee code: Other

Consultee Organisation (if applicable): Railfuture

Is this response on behalf of someone else/another organisation? No

Organisation being represented (if applicable):

Does this representation refer to attachment(s):
yes

If this representation refers to attachment(s), these are listed below:
WEST039

WE1. What do you think to the scale of growth? Should there be a brownfield target?

WE2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?

WE3. Is this the right pool of potential development sites?

WE4. What land do you think is the most appropriate upon which to build?

WE5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?

WE6. Are there any issues or infrastructure requirements that should be identified?

Planning for Westbury

We agree that Westbury station is an important rail hub with train services in six directions. It needs improved connectivity with buses and between east-west and north-south train services. Reinstatement of the fourth platform would allow more trains to connect at any one time and improve the opportunities for cross-platform interchange, which is essential for less able passengers.

Further comments

Rep ID: WEST040	
Consultee code: Statutory Body	Consultee Organisation (if applicable): Historic England
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): yes	If this representation refers to attachment(s), these are listed below: WEST040
WE1. What do you think to the scale of growth? Should there be a brownfield target?	
<p>The form and character of the town, within its wider landscape setting, and the availability of suitable sites should inform the proposed scale of growth.</p> <p>We would support Wiltshire Council's efforts to identify, allocate and prioritise all potential brownfield opportunities, big and small, including repurposing existing vacant sites, or underused buildings of historic interest to help reinforce and enhance the character of the town and in turn limit sprawl. An ambitious brownfield first target is encouraged although the related future capacity (numbers/amount of brownfield development) must relate to the context of the site(s) ensuring a good fit with the townscape.</p>	
WE2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?	

A Heritage Topic Paper can help to inform such priorities and in doing so demonstrate a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats (NPPF para 185). At present it isn't clear how these priorities have been established.

WE3. Is this the right pool of potential development sites?

The Council should consider whether a setting assessment could help inform the promotion of suitable alternative development sites.

Disclaimer – Historic England has not undertaken a detailed assessment of the suggested sites due to Wiltshire Council's intention to provide further evidence. We therefore respectfully reserve judgement until then. We note several proposed sites adjoin or effect the setting of designated heritage assets. Their significance needs to be determined and applied to inform site suitability and if the principle is acceptable, the form that development should take to avoid or minimise harm and deliver potential enhancement.

WE4. What land do you think is the most appropriate upon which to build?

We note several proposed sites affect the setting of designated heritage assets. Their significance needs to be determined and applied to inform site suitability and if the principle is acceptable, the form that development should take to avoid or minimise harm and deliver potential enhancement.

WE5. Are there important social, economic or environmental factors you think we've missed that need to be considered generally or in respect of individual sites?

A strategic understanding of the history, character and landscape setting should inform the spatial distribution, capacity and specific allocations proposed. To do so a heritage topic paper is suggested; a strategic landscape setting assessment and Conservation Area Appraisals to inform brownfield capacity and place shaping opportunities. Any further site assessment should be independent and robust, undertaken or commissioned by the local planning authority rather than relying solely on evidence provided by the promoter of a site.

WE6. Are there any issues or infrastructure requirements that should be identified?

We note that the historic environment/heritage assets is an important component part of Wiltshire's infrastructure – described in your Settlement Profile as Green & Blue Infrastructure. A heritage topic paper could establish whether there are any 'other issues', needs and opportunities relating to the historic environment.

Further comments

It will be important to demonstrate, perhaps in a discrete heritage topic paper, how proposals will have considered and responded to the historic environment, the town's history, character and, in particular, it's landscape setting and surrounding heritage assets. Westbury doesn't appear to have an up to date Conservation Area Appraisal and Management Plan but perhaps more importantly is the apparent absence of a setting assessment to inform considerable potential edge of town expansion.