

T&L11a



CPRE WILTSHIRE'S RESPONSE TO THE TIDWORTH AND LUDGERSHALL LOCAL PLAN QUESTIONNAIRE.

TL1. What do you think to the scale of growth? Should there be a brownfield target? Should it be higher or lower?

Based on the evidence in the reports we have commissioned we would argue that much less housing is needed

889 houses remain permitted.

The need is for jobs and services to catch up before more greenfield houses are allocated in order to reduce commuting and travel generally and meet the need to reduce carbon emissions.

Granting greenfield land to the main developers has not resulted in affordable houses being provided, especially those for rent. A combined Neighbourhood Plan should be able to allocate land for identified local need.

There should be a brownfield target and it should be higher and count towards the number of houses allocated. A combined Neighbourhood Plan could help find land in need of regeneration.

TL2. Do you agree that the strategy should look to allocate more employment land?

No. There remain 10 ha not yet taken up at Castledown.

TL3. How could the delivery of employment on the Castledown Business Park be facilitated?

Small. Start-up businesses could be encouraged.

The Town Councils and a combined Neighbourhood Plan for Ludgershall and Tidworth could help to identify local needs/solutions.

TL4. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?

Once a survey to discover identified need has been requested from Wiltshire Council by the Town Councils and carried out, the number and kind of affordable houses that are needed will be made known. Building these through a Community Land Trust or other similar organisation should be a priority, given that so few affordable houses have been delivered in recent years, especially those for rent at a price that is truly affordable.

TL5. Is this the right pool of potential development sites? Are there any other sites we should be considering?

There is no need to identify sites currently. If one is identified, it should be held back until jobs and services have caught up. With five-year reviews, the issue can be monitored.

All the proposed sites appear to have environmental constraints, historic and natural.



TL6. What land do you think is the most appropriate upon which to build? What type and form of development should be bought forward at the town?

Brownfield land. With the need for changes brought about by accelerating climate change and Covid 19 and the move to on-line shopping, there may be many more opportunities either to adapt, re-build, or create a park.

TL7. 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 pandemic and accelerating Climate Change have shown the need for Wiltshire Council, together with Town Councils and Neighbourhood Plans, to map: biodiversity, flood plains, carbon sinks, open space, sport and recreation areas, community energy generation (on roofs and with heat pumps) and storage, and for these areas to be strongly protected before any further development is envisaged or allocated.

The design of building should be according to the National Design Guide: Building for Beauty.

TL8. Are there any issues or infrastructure requirements that should be identified?

Other than that already identified within the 'Planning for' document?

Land for a station, within walking distance of many of the existing houses, should be safe guarded.

If you have any further comments you wish to make, please detail them below.

T&L11b

WILTSHIRE LOCAL PLAN CONSULTATION

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

██████████

February 2021

1. Background

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

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

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

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

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

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

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

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

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

4. I was not asked to come to a view on the distribution of housing or on specific sites. This report, therefore, does not consider whether any single location is correct but whether the overall numbers and approach should be supported.
5. My conclusion is that using an estimate of housing need based on the Standard Methodology with a modest allowance for windfalls should be adopted which would reduce the overall need for housing.
6. I have not considered the distribution of residual housing need in detail, but this would allow CPRE to identify the most sustainable locations and to oppose over-provision elsewhere.
7. The Report is in three parts. The first deals with the overall Housing Need calculation, the second with the level of expected Windfall Provision and the third with the approach to Supply.

2. Housing Need

8. The Plan sets out two figures for the Housing Need in Wiltshire. The first is the output from the Government's Standard Methodology, 2042 dwellings per annum (dpa) or 40,840 homes between 2016 and 2036, the second is a figure of 45,630 both derived from the Local Housing Need Assessment (LHNA). The increase is entirely based on assumptions about the balance between jobs and workforce and is derived from the earlier FEMA.
9. The Government also consulted in 2020 on a new Standard Methodology which would have increased the housing need in Wiltshire but it was shelved in favour of retaining the current SM with an uplift to the twenty largest towns and cities in the country with the aim of increasing urban brownfield development. This did not include Wiltshire or neighbouring Swindon.
10. In their published response on 16 Dec 2020⁶ the Government stressed the importance of brownfield development and directing development to urban regeneration sites, as well as the potential for larger scale changes to town centres, reflecting the acceleration of structural change to retail, leisure and other urban uses following the COVID pandemic.

Standard Methodology

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

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

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

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

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

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

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

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

Local Housing Needs Assessment

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

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

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

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

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

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

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

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

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

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

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

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

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

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

⁸ [Housing and Economic Development Needs Assessment \(HEDNA\) -Strategic Growth Plan LCC \(11strategicgrowthplan.org.uk\)](https://www.local.gov.uk/sites/default/files/2016-06/Housing%20and%20Economic%20Development%20Needs%20Assessment%20(HEDNA)%20-%20Strategic%20Growth%20Plan%20LCC%20(11strategicgrowthplan.org.uk))

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

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

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

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

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

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

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

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

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

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

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

¹⁰ [New Local Plan - Blaby District Council](#)

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

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

3. Windfalls

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

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

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

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

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

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

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

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

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

Chart 1: Windfall permissions

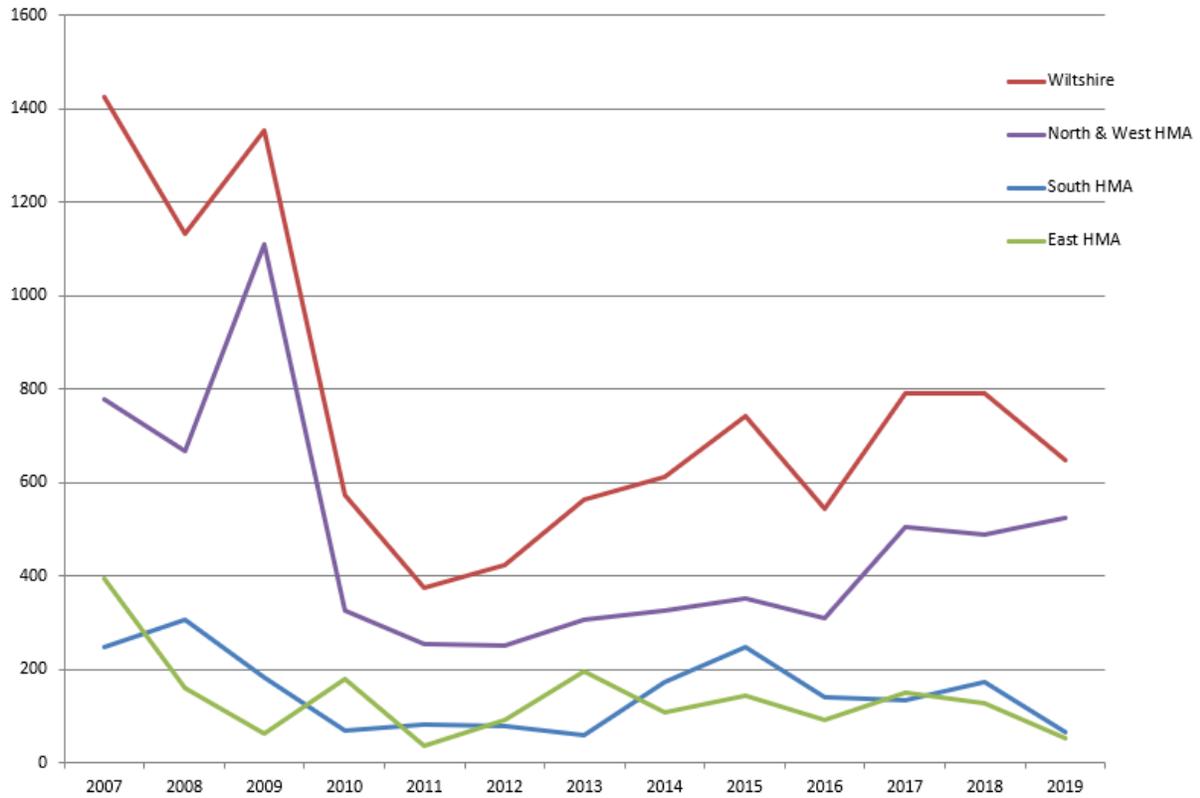
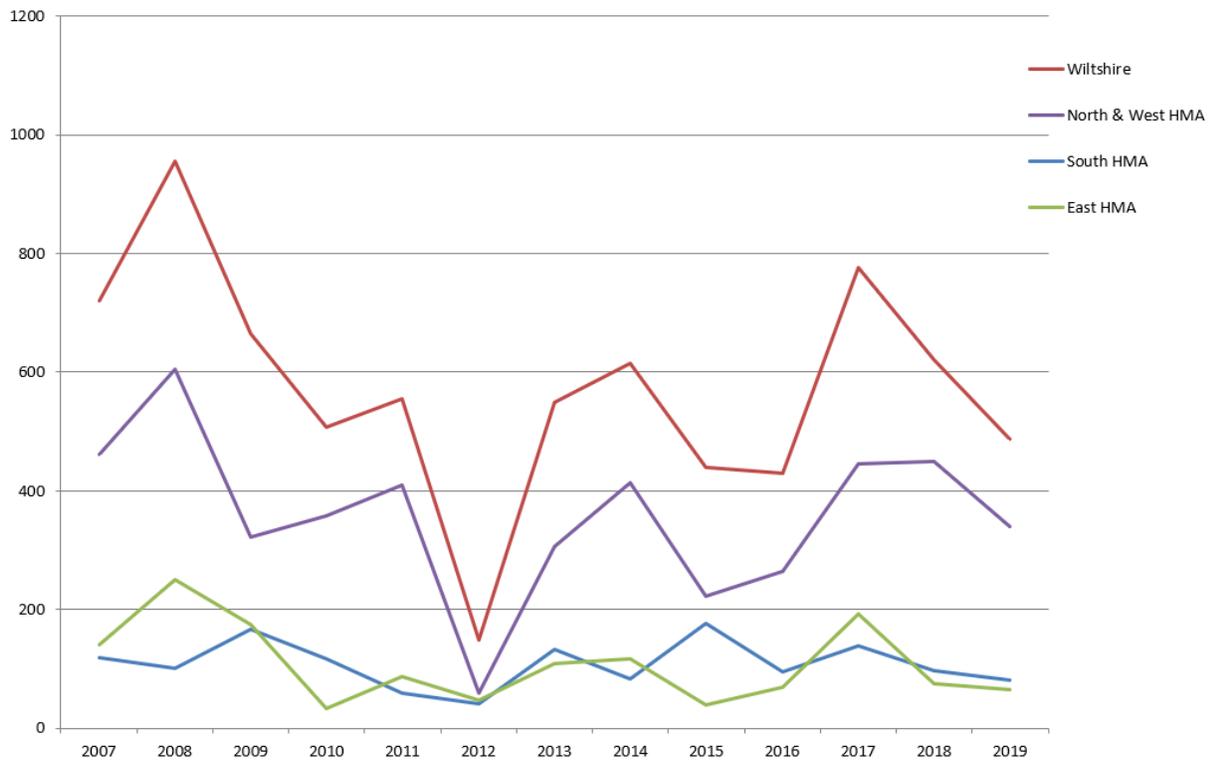


Chart 2: Windfall completions



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

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

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

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

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

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

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

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

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

4. Supply

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

5. Conclusion

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

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

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

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

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

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

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

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

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

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

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

Appendix 1:

Green Belt Supply Side Table for Wyre Forest

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

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

Appendix 2:

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

Dear [REDACTED]

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

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

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

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

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

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

Best regards

[REDACTED]

[REDACTED] Spatial Planning Manager (Monitoring & Evidence), Wiltshire Council

T&L11c

WILTSHIRE LOCAL PLAN CONSULTATION

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

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February 2021

1. Background

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

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

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

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

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

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

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

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

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

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

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

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

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

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

2. Functional Economic Market Area Report (FEMA)

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

3. Employment Land Review (ELR)

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

4. The Draft Plan

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

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

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

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

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

5. Commentary

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

This includes whether:

- *the proposed employment land requirement identified in the Swindon and Wiltshire FEMAA can be accommodated within each authority's boundaries and if not the extent of the shortfall in provision⁶*

55. It seems to me that the authority should provide evidence as to why the additional employment land allocated in that corridor should be specifically allocated in Wiltshire.

56. More generally, and in all the corridors, I would have liked to see more emphasis on the quality of the sites, matching employer demand, rather than the quantum or size. Without employer orientated consideration, there is a risk that oversupply will lead to lack of uptake.

⁶ Swindon and Wiltshire joint spatial framework | Swindon Local Plan | Swindon Borough Council

6. Conclusions

57. The justification for the shortfall in land for business (both offices and industrial) is based on evidence which predates the impacts of both BREXIT and COVID. It is likely that at least some changes in working practices will persist that will impact on both the need and supply of space for business.

Moreover, the shortfall only occurs if one adopts more bullish assumptions about economic growth and population growth.

58. Given that the shortfall accounts for only about 10% of supply and is unlikely to occur until late in the Plan Period, the justification for additional allocations seems to me limited.

59. In terms of the specific FEMAs, the shortage of choice of sites in Chippenham and Trowbridge, while identified as anecdotal, might justify additional provision. I was not asked to consider whether that anecdotal evidence was justified but I understand CPRE will make representations on that. However, even if it is, it is not clear to me why no consideration is given to whether this should be considered to compensate for the modest shortfalls in the other FEMAs.

60. Moreover, I am unclear why there is no consideration of whether the shortfall in the Swindon FEMA could or should be met within Swindon Council.

61. While there may be a case for modest additional allocations based on specific shortfalls of available sites, these considerations do not appear to be clearly articulated in the supporting material.

62. Furthermore, neither the plan nor the Sustainability Appraisal considers reasonable options which would reduce the amount of land required

63. My view, therefore, is that CPRE Wiltshire has justification for objecting to those allocations and specifically identify further work which would be required to robustly justify continuing with this level of additional allocations for business use as the Plan progresses.

64. The objection should not only be to the quantity of development, but it needs to identify the purpose of any additional allocations.

T&L13

1. Background

1.1 The Defence Infrastructure Organisation (DIO), on behalf of the Ministry of Defence (MOD) welcomes the opportunity to comment on the Wiltshire Local Plan Review Consultation. The consultation relates to a number of documents including the Emerging Spatial Strategy, Empowering Rural Communities, and Addressing Climate Change and Biodiversity Net Gain through the Local Plan. In addition, a series of settlement specific papers have been published which highlight potential development locations and place shaping priorities. The DIO manages the Defence Estate on behalf of the MOD.

The MOD has a number of operational establishments within Wiltshire and has a long and proud history of working with the Community, which is reflected in both local level and county wide liaison meetings, such as the MCI Partnership. Additionally, MOD establishments provide civilian employment and training opportunities and many service personnel and their families choose to settle within the County both during and after their military service.

1.2 The MOD welcomes the opportunity to work closely with Planning Authorities in the development of policies and strategies within the Development Plan. As recognised in the National Planning Policy Framework, it is important that Planning Authorities consult with the MOD during the preparation of their plans and take into account the need to safeguard operational sites. I would like to draw your attention to paragraph 95 of the National Planning Policy Framework (February 2019), which states:

“Planning policies and decisions should promote public safety and take into account wider security and defence requirements by:… b) recognising and supporting development required for operational defence and security purposes, and ensuring that operational sites are not affected adversely by the impact of other development proposed in the area.”

2. Representations

Spatial Strategy

The MOD is supportive in principle of the preparation of the Wiltshire Local Plan Review Spatial Strategy and is broadly supportive of the Plan’s objectives. However, the MOD has concerns regarding sections of the Plan that would affect the operational abilities of certain MOD sites.

2.1 Potential Development Sites The MOD has the following comments to make on the Potential Development Sites identified:

2.2. Amesbury

2.2.1 Site 3 ‘Land to the West of Boscombe Down’ . The MOD object to the identification of this site as a potential development site. Site 3 is located at the western edge of Boscombe Down Airfield. I repeat the comments made by the DIO Safeguarding Team as support for this objection:

“The site identified as no. 3 in the Market Town Site Selection Report for Amesbury (formerly with ref nos. S1010 Land at Stock Bottom and S1054 Land adjacent to Stockport Park) is constrained by the Aerodrome and Technical safeguarding zones associated with Boscombe Down which require consultation on any development of this site, in addition a substantial part of the site is washed over by an explosives storage safeguarding zone that precludes inhabited development. It is recommended that this allocation is removed from the local plan”

There is an additional impact on the flight safety/operational activity of the Airfield. Due to the proximity of the area (Plot 3) to the runway, the current lack of housing means that it remains an option for forced landings for single engine aircraft in an emergency. In the event that the ‘departure channel’ [Site 3] becomes filled with housing development this effectively eliminates forced landing

options for departing single-engine aircraft which could see the cessation of single-engine Fixed Wing and Rotary operations from that area; this would significantly impact Empire Test Pilot School and Rotary Wing T&E Squadron H125 operations and Southampton University Air Sqn (SUAS) (Tutor operations). The MOD would therefore consider the allocation of residential development on Site 3 as being contrary to Paragraph 95b of the NPPF.

2.3 Corsham

2.3.1 Site 5 'The Circus': The site is owned by the MOD and is part of an operational site. It is not available for disposal and consideration for residential development at this time. Please remove it from further consideration and assessment in the local plan process.

2.4 Tidworth and Ludgershall

2.4.1 Site 1 'Land East of Crawlboys Road'. The site is owned by the MOD and the further assessment of the site for residential development is supported.

2.4.2 Site 2 'Land North of A342'. The site is owned by the MOD and the further assessment of the site for residential development is supported.

2.4.3 Site 3 'SHELAA ref 2067'. The site is owned by the MOD and the further assessment of the site for residential development is supported.

2.4.4 Site 4 'Land at Empress Way'. The site is adjacent to land owned by the MOD. The MOD have no objection in principle to the site going forward for further appraisal for residential development.

2.4.5 Site 5 'South West Ludgershall'. The site is owned by the MOD and is part of an operational site. It is not available for disposal and consideration for residential development at this time. Please remove it from further consideration and assessment in the local plan process.

2.4.6 Site 6 'Land North of Wellington Academy'. The site was transferred from MOD ownership to Wiltshire Council as part of the 106 agreement for the Army Basing Programme for a new playing field for Wellington Academy. Under the transfer document the use of the land is restricted to the construction, maintenance and running of the Wellington academy extension. The site should therefore be removed from further consideration for residential development in the Local Plan process.

2.4.7 Site 7 'Land North of A3026'. The site is owned by the MOD but is not available for disposal and consideration for residential development at this time. Please remove the site from further consideration and assessment in the local plan process.

2.4.8 Site 8 'Land West of Pennings Road'. The site is owned by the MOD and is part of an operational site. It is not available for disposal and consideration for residential development at this time. Please remove it from further consideration and assessment in the local plan process.

2.4.9 Site 9 'North West Tidworth'. The site is owned by the MOD and is part of an operational site. It is not available for disposal and consideration for residential development at this time. Please remove it from further consideration and assessment in the local plan process.

2.4.10 Site 10 'Land South of Bulford Road'. The site is owned by the MOD and is part of an operational site. It is not available for disposal and consideration for residential development at this time. Please remove it from further consideration and assessment in the local plan process.

2.4.11 Site 11 'Land South of the Mall'. The site is owned by the MOD and is part of an operational site. It is not available for disposal and consideration for residential development at this time. Please remove it from further consideration and assessment in the local plan process.

2.5 Warminster

2.5.1 Site 1 'North Warminster, Land North of Elm hill, Land South of Elm Hill'. The site is owned by the MOD and is part of an operational site. It is not available for disposal and consideration for residential development at this time. Please remove it from further consideration and assessment in the local plan process.

2.5.2 Site 2 Part of the site (SHELAA ref 2075 'Land South of the Railway Line') is owned by the MOD. Further assessment of the site for residential development is supported, subject to there being no access through the MOD estate to the north of the railway line.

2.6 MOD Sites Identified for Disposal

2.6.1 The 'Better Defence Estate Strategy' of 2016 announced the disposal of some MOD sites within Wiltshire. Of these, the following sites remain for disposal within the Local Plan period:

- RAF Colerne
- Azimghur Barracks
- Buckley Barracks
- Leighton House

2.6.2 Further studies and assessments of the development potential of these sites are ongoing and, therefore, firm proposals are not available for inclusion in this consultation response. However, the MOD will continue to liaise with Wiltshire Council as to the future development of these sites. Whilst not the subject of this consultation, the MOD support the retention of Core Policy 37 "Redevelopment of Redundant MOD Sites" as the framework for masterplanning the sites' re-use with Wiltshire Council, in conjunction with the local community.

2.7 Wiltshire Local Plan Addressing Climate Change and Biodiversity NetGain

2.7.1 The consultation document above is noted.

2.7.2 As a Central Government department, the Ministry of Defence (MOD) is mandated to support the delivery of the Government's sustainability objectives and contribute towards the UN Sustainable Development Goals. In a defence context sustainability is about ensuring that we are resilient and adaptable to enable us to respond to future risks and address the implications for defence capabilities, whilst respecting and minimising the impacts on the environment, availability of resources, changes in the climatic and geographical arena, at home and abroad. The MOD has a policy instruction of "A Net Zero and resilient infrastructure – designed, constructed and operated to enable decarbonisation by 2050".

Already the MOD is delivering a number of projects such as delivering Net Zero Service Families Accommodation sites: through retrofitting existing SFA with PV / battery storage and requiring developers to ensure Net Zero standards are met on new SFA developments.

Also, the Prometheus Project is looking at provision of PV developments to provide on site renewable energy on Army sites across the UK (some are already being delivered).

Other renewable energy projects across the defence estate will inevitably mature over the life of the Wiltshire Local Plan.

3. Conclusion

3.1 The MOD respectfully submit that:

- a. Site 3 'Land to the West of Boscombe Down' in Amesbury is removed as a potential site for residential development for the reasons set out in paragraph 2.2.1
- b. Site 6 'Land North of Wellington Academy' is removed as a potential site for residential development for the reasons set out in paragraph 2.4.6

- c. The sites owned by the MOD that are not available for development are removed as potential residential development sites. These are :
Corsham Site 5
Tidworth & Ludgershall Sites 4,5,7,8,9,10,11
Warminster Site 1

NB the MOD will consider whether to withdraw these sites from the SHELAA at a later date.

- d. The further assessment of potential residential development of the following MOD owned sites is supported. These are Tidworth: sites 1,2 and 3, and Warminster: part of site 2.
- e. Whilst not part of this consultation, the MOD supports the retention of Core Policy 37 as a framework for masterplanning the redevelopment of the identified disposal sites listed in paragraph 2.6.1

3.2 The DIO on behalf of the MOD would welcome the opportunity to discuss the above representations with Wiltshire Council.

T&L14

Date: 09 March 2021
Our ref: 339188



Customer Services
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Dear Sirs,

Wiltshire Council Local Plan Review

Thank you for your consultation on the above dated 11 January 2021

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

We welcome Wiltshire Council's engagement with Natural England from an early stage in the process, we note there are currently no changes to specific policy, therefore we provide broad advice on the plans strategy and what should be considered when developing policy. In addition we will provide advice on each principal settlement and market town where the council has determined allocations moving into the final pool of sites to be assessed in the plan period 2016-2036. We wish to acknowledge that this response is considered as part of an iterative approach to plan design with Wiltshire council and look for to further discussion.

Natural England's main concern at this stage is that the new local plan ensures development is directed to the most sustainable places and provides high quality green/ open space for new and existing communities. We would expect to see suitable policies that address the impacts of increased recreation on local green spaces, and for designated sites and landscapes, by ensuring its effects are properly managed.

Natural England is concerned about the effects of recreation on international and national designated sites within and beyond the local plan area. The impacts of recreational use is widely recognised as a significant issue impacting on designated sites. Recreational impacts can include soil compaction/loss and eutrophication from dog fouling.

Emerging Spatial Strategy

The Plan's vision and strategy

Natural England advises that the Plan's vision and emerging development strategy should address impacts on and opportunities for the natural environment and set out the environmental ambition for the plan area. The plan should take a strategic approach to the protection and enhancement of the natural environment, including providing a net gain for biodiversity, considering opportunities to enhance and improve connectivity. Where relevant there should be linkages with the Biodiversity Action Plan, Local Nature Partnership, Area of Outstanding Natural Beauty Management Plans, Rights of Way Improvement Plans and Green Infrastructure Strategies and Nature Recovery Network.

Sites of Least Environmental Value

In accordance with the paragraph 171 of NPPF, the plan should allocate land for development with the least environmental or amenity value. Natural England expects sufficient evidence to be provided, through the SA and HRA, to justify the site selection process and to ensure sites of least

environmental value are selected, e.g. land allocations should avoid designated sites and landscapes and significant areas of best and most versatile agricultural land and should consider the direct and indirect effects of development, including on land outside designated boundaries and within the setting of protected landscapes. Further, outside designated sites and local wildlife sites all allocations should ensure known priority habitats are avoided and ensure that potential allocations supporting permanent grassland are supported by a preliminary botanical assessment so as to ensure they do not support significant grassland interests (see comments below on priority habitats, ecological networks and priority and/or legally protected species populations).

Designated sites

The Local Plan should set criteria based policies to ensure the protection of designated biodiversity and geological sites. Such policies should clearly distinguish between international, national and local sites¹. Natural England advises that all relevant Sites of Special Scientific Interest (SSSIs), European sites (Special Areas of Conservation and Special Protect Areas) and Ramsar sites² should be included on the proposals map for the area so they can be clearly identified in the context of proposed development allocations and policies for development. Designated sites should be protected and, where possible, enhanced.

Habitat Regulations Assessment – Screening and Scoping

Natural England welcome iterative dialogue over the points that have been raised and are dedicated to working with the council and Land Use Consultants (LUC) to reach a solution that assists the council and delivers positive environmental outcomes for the inhabitants of Wiltshire.

General guidance and comment on HRA

The HRA is linked from the council's consultation page as a screening document however the document is titled as scoping. Natural England believe this document to be both the screening and scoping stage and should be labelled accordingly.

As of 1 January 2021, the Conservation of Habitats and Species Regulations 2017 (as amended) and the Conservation of Offshore Marine Habitats and Species Regulations 2017 (as amended) have both been amended so that they continue to operate effectively now that the transition period has ended and the UK has completed its exit from the EU.

The changes that are now in force have been made by the [Conservation of Habitats and Species \(Amendment\) \(EU Exit\) Regulations 2019](#). The changes ensure the strict protections afforded to sites, habitats and species as derived from the EU Habitats and Wild Birds directives continue. Most of these changes involve transferring functions from the European Commission to the appropriate authorities in England and Wales.

All other processes (such as HRA) and terms (such as SACs, SPAs and European Sites) found in the 2017 Regulations remain unchanged and existing guidance is still relevant. Natural England note that your HRA makes reference to 'Natura 2000' sites, please cross reference your HRA screening scoping with new current guidance.

Defra and Welsh Government have published their new HRA Guidance on GOV.UK at <https://www.gov.uk/guidance/habitats-regulations-assessments-protecting-a-european-site>.

Accompanying this is a new derogation notice template for competent authorities to use <https://www.gov.uk/government/publications/habitats-regulations-assessment-derogation-notice> .

In addition there is also new guidance for competent authorities on their duty to help protect, conserve and restore European sites <https://www.gov.uk/guidance/duty-to-protect-protect-restore-european-sites> (which covers the obligations derived from articles 6.1/6.2 of the habitats directives

¹ International sites include: Special Protection Areas (SPAs); Special Areas of Conservation (SACs) and Ramsar sites¹. National sites include Sites of Special Scientific Interest (SSSIs) and National Nature Reserves (NNRs) Local sites include wildlife Sites or geological sites (a variety of terms are in use for local sites).

² The following wildlife sites should also be given the same protection as European sites: potential SPAs, possible SACs, listed or proposed Ramsar sites and sites identified, or required, as compensatory measures for adverse effects on European sites

which from part of the general regulation 9 duty).

Natural England agrees with the approach taken to assess European sites within and extending beyond the county boundary. Reviewing the information provided we agree that all European sites have been identified correctly for HRA screening.

4.4 The HRA makes an assumption that only sites within the county boundary will result in physical damage or loss of habitat, however, increase in recreational pressure can lead to physical damage on the features for which European sites are designated for. Natural England suggest further work is required to understand the level of recreational pressure outside the county boundary to assess likely significant effect of its plan and policies. This is evident in paras 4.41 – 4.46 of your HRA.

4.23 Water voles are a distinctive/typical species supported by the River Avon SAC habitat. A water vole mitigation strategy should be discussed and agreed with Natural England. Similarly, **otters** also make an important contribution to the structure, function and/or quality of the SAC habitat, and the EIA will fully assess the impacts of the scheme on this species. This should be noted within the HRA.

4.34 Natural England support the application of this guidance and notes the inclusion of an in-combination assessment for air pollution.

4.39 Natural England advises that the final pool of assessment sites at Salisbury (namely site 6) has potential to increase traffic on the surrounding road network particularly the A338 and A36 both of which are at various points within 200m of the River Avon SAC. Natural England advise scoping in air pollution when considering impacts on the River Avon SAC and continuing to the Appropriate Assessment stage.

Increases in housing in settlement area such as Bradford-on-Avon, Corsham, Marlborough and Trowbridge will lead to increase vehicle movement in areas near or next to internationally designated sites notified for habitats that are sensitive to changes in air quality and should be assessed.

4.40 Requires clarification.

4.47 Natural England note that site 1 (SHELAA reference 662) is within 7km of Pewsey Down SAC. Increase housing within Devizes has potential to increase recreational disturbance at this designation. Natural England therefore consider that Pewsey Downs SAC should not be scoped out and should continue to the Appropriate Assessment stage

Table 4.2 noted required change to ZOI for North Meadow and Clattinger Farm SAC (NE have agreed a reasonable precautionary figure)

Natural England is confirming the ZOI for Cotswold Beechwoods.

Internationally Designated Sites Strategic Solutions Trowbridge Bats SPD (Bath and Bradford on Avon Bat SAC)

The Trowbridge Bat Mitigation Strategy (TBMS) SPD was adopted in February 2020 to assist developers in assessing the potential impacts on Wiltshire's bat populations and to assess the impacts of future housing within the Wiltshire Housing Site Allocation Plan.

Natural England advises that additional sites proposed will need to be assessed in relation to TBMS and subsequently their impacts on the Bath and Bradford on Avon Bat SAC.

In particular the local plan must give consideration for its ability to contribute to the potential designation of Trowbridge Woods SSSI. TBMS is underpinned by an evidence base dating back to 2005 which gives us an understanding of the history of usage by bats in the Trowbridge area. Natural England advise that this evidence base requires updating to further consider the use of functionally linked habitat, specifically the area known as the Hilperton Gap, by bats species in the south of Trowbridge to the North West and the wider impacts on the Bath and Bradford on Avon Bat SAC.

River Avon SAC

Natural England recognises the requirement to amend this policy in light of recent agreement between Natural England the Environment Agency, Wessex Water and Wiltshire council. We recognise the challenges faced with conformity with NPPF to conserve and enhance the special qualities of the River Avon SAC and delivering government driven housing targets. Natural England acknowledge the councils drive to work collaboratively with partners to promote nutrient neutral development within the River Avon system catchment in a joint partnership to achieve favourable conservation status.

The agreed strategic solution for ensuring residential developments achieve phosphorous neutrality on the River Avon is a matter for the Wiltshire Council who have undertaken to underwrite the scheme, not Natural England. Proposals that are accepted by your Council into the mitigation strategy may rely on the standard Appropriate Assessment that has previously been agreed by Natural England. However, those developments that your Council considers ineligible for the agreed strategic approach will require a bespoke Appropriate Assessment completed by the competent authority in accordance with Regulation 63 of the Conservation of Species and Habitats Regulations 2017 (as amended).

Consideration will also need to be given to the additional pressure on water resources in the future, in particular with climate change and the increasing trend for consecutive dry summers to impact on the river ecology. In the future it may be that Wessex Water needs to take further action to reduce abstraction at these sensitive times to protect the River Avon SAC.

Salisbury Plain SPA

Since this plan considers further sites for assessment will result in a net increase in residential accommodation, impacts to the Special Protection Area(s) and Ramsar Site(s) may result from increased recreational disturbance. Your authority has measures in place to manage these potential impacts through the agreed strategic solution which we consider to be sound.

Subject to the appropriate financial contribution being secured, Natural England is satisfied that the proposal will mitigate against the potential recreational impacts of the development on the site(s).

North Meadow and Clattinger Farm SAC

Through the work with Swindon BC on their local plan review it has been determined that recreational disturbance is impacting upon the notified features of North Meadow and Clattinger Farm SAC. Discussions with Swindon BC, Cotswold DC, Wiltshire council and NE are ongoing. LUC are developing the evidence base to underpin a strategic solution for North Meadow and Clattinger Farm SAC.

In respect of this SAC we acknowledge the provisional status of the 7km threshold applied for screening purposes. Given the precautionary nature of assessment under the Habitats Regulations it is important to state this distance threshold will need to be reviewed once up to date visitor survey information is available.

New Forest International sites

Natural England advises that all sites within the zone of influence of the New Forest SAC, SPA and Ramsar site will need to avoid recreational impacts. We welcome further discussion on how the council should approach this.

Interim Sustainability Appraisal

In our view, the Sustainability Appraisal provides a fair and detailed assessment of the sustainability performance of the priorities, building blocks, guiding principles and various policy and locational options for accommodating growth and new development. It identifies a number of aspects that could be strengthened and makes recommendations for subsequent stages of the local plan, all of which Natural England would support, particularly with respect to making more explicit the role of GI in addressing the effects of climate change and the health benefits of enhancing access to green space and active travel.

Natural England understands that Wiltshire council are aware of recreational pressure on designated sites, we recommend that strategic approaches to mitigating and managing this issue should be discussed with New Forest DC to meet the duty to cooperate. Designated sites and landscapes are the heart of nature recovery and ecological networks and we consider that the issue of recreation on these assets is significant and will require more specific consideration in the SA and HRA as part of the local plan review.

Given the challenge of meeting raised ambitions across many of the Plan's priorities, the SA is an important tool for furthering integration of objectives and policies and helping to avoid 'trade-offs' between what can be viewed as conflicting goals.

Based on the level of assessment carried in conjunction with the final pool of potential sites for further detailed assessment Natural England offer the following comments.

Empowering rural Communities

Revised Core Policy 44

iv. Suggest bolstering, 'development will not negatively impact upon national and international biodiversity and landscape designations'. Rural exception sites should also provide net gains for biodiversity and where adverse impacts on landscape designations are unavoidable then appropriate compensation measures that will help deliver the objectives of the AONB management plan should be sought.

Addressing climate change and biodiversity net gain through the Local Plan – raising the ambition

The Local Plan should consider climate change adaption and recognise the role of the natural environment to deliver measures to reduce the effects of climate change, for example urban tree planting to moderate heat island effects. In addition factors which may lead to exacerbate climate change (through more greenhouse gases) should be avoided (e.g. pollution, habitat fragmentation, loss of biodiversity) and the natural environment's resilience to change should be protected. Green Infrastructure and resilient ecological networks play an important role in aiding climate change adaptation.

See **appendix A** for further detail on how to integrate climate change adaptation into the local plan.

Policy Theme 1 – Tackling Flood Risk and Promoting Sustainable Water Management

Natural England strongly recommends that all new development adopt the higher standard of water efficiency under the Building Regulations (which equates to 110 litres /head/day including external water use) and re-use in line with best practice.

Natural England supports the use of multi-functional retro fitted SuDS. The management of surface water run-off through well designed wetlands can be used as an opportunity to improve the quality of GI and create biodiverse areas. The options that exist include balancing pools, wetlands (often in the form of filtration reedbeds), ditch systems, swales, rain gardens and permeable surfaces. Water input can come from any part of a site, including roofs, and may be of a cleaner quality than in surrounding urban or agricultural settings, allowing the creation of high quality wetland and aquatic habitat. SUDs for new development and retro fitted SUDs to existing urban areas can also play a useful role in reducing nutrient pollution to water courses.

Such habitat can also serve pollinators in a number of ways. The larvae of many pollinators develop in shallow water, wet mud or the vegetation associated with water margins. Water margins can also be very flowery habitats featuring plants such as Angelica, Water Mint, Gypsywort, Yellow Iris, Greater Bird's-foot Trefoil, Marsh Woundwort, Great Willow herb and a variety of willows. As such, they have the potential to act as hotspots of pollinator activity from spring until early autumn. SuDS can also buffer against the effect of prolonged summer droughts, providing damp flowery habitats

when that of the surrounding landscape has disappeared. If they are combined with low topography, they can also provide opportunities for ground nesting bees and wasps.

. The requirement to use a SuDS should be built into the specification of a new development scheme from the outset. A good online accounts of how SuDS can be designed for wildlife are available from the

RSPB/WWT : https://www.rspb.org.uk/Images/SuDS_report_final_tcm9-338064.pdf

Policy Theme 2 – Enhancing Green/ Blue Infrastructure (GBI) and biodiversity

Green infrastructure refers to the living network of green spaces, water and other environmental features in both urban and rural areas. It is often used in an urban context to provide multiple benefits including space for recreation, access to nature, flood storage and urban cooling to support climate change mitigation, food production, wildlife habitats and health & well-being improvements provided by trees, rights of way, parks, gardens, road verges, allotments, cemeteries, woodlands, rivers and wetlands. The economic value of urban parks is now increasing understood, for example:

<https://thelandtrust.org.uk/the-land-trust-charitable-aims/thebenefits/>

More recent studies have also been completed for the parks within the Bournemouth conurbation.

Green infrastructure is also relevant in a rural context, where it might additionally refer to the use of farmland, woodland, wetlands or other natural features to provide services such as flood protection, carbon storage or water purification.

A strategic approach for green infrastructure is required to ensure its protection and enhancement, as outlined in para 171 of the NPPF. Green Infrastructure should be incorporated into the plan as a strategic policy area, supported by appropriate detailed policies and proposals to ensure effective provision and delivery. Evidence of a strategic approach can be underpinned by Green Infrastructure Strategy. We encourage the provision of green infrastructure to be included as a specific policy in the Local Plan or alternatively integrated into relevant other policies, for example biodiversity, green space, flood risk, climate change, reflecting the multifunctional benefits of green infrastructure.

The Plan should set out a strategic approach, planning positively for the creation, protection, enhancement and management of networks of biodiversity. Where appropriate there should be consideration of geodiversity conservation in terms of any geological sites and features in the wider environment.

A strategic approach for networks of biodiversity should support a similar approach for green infrastructure (outlined below). Planning policies and decisions should contribute and enhance the natural and local environment, as outlined in para 170 of the NPPF. Plans should set out the approach to delivering net gains for biodiversity.

Net gain for biodiversity should be considered for all aspects of the plan and development types, including transport proposals, housing and community infrastructure. The plan's approach to biodiversity net gain should be compliant with the mitigation hierarchy, as outlined in paragraph 175 of the NPPF ensuring that the loss of priority habitats is where possible avoided. The policy should also ensure that biodiversity net gain is not applied to irreplaceable habitats and should also make clear that any mitigation and/or compensation requirements for European sites should be dealt with **separately** from biodiversity net gain provision.

Policies and decisions should first consider options to avoid adverse impacts on biodiversity from occurring. When avoidance is not possible impacts should be mitigated and finally, if there is no alternative, compensation provided for any remaining impacts. Biodiversity net gain should be additional to any habitat creation required to mitigate or compensate for impacts. It is also important to note that net gains can be delivered even if there are no losses through development.

We advise the local plan should make provision for development of a specific Supplementary Planning

Document on net gain that will outline in detail Council expectations of developers and mechanisms for delivery, as well as ensuring net gain is delivered in a suitably strategic way. Natural England would be happy to engage with the Council on implementing net gain into local policy and to advise further on the development of such a SPD.

Please note that Biodiversity Metric 3.0 is due to be published in Spring 2021, which will supersede Biodiversity Metric 2.0. We advise that the policy is updated accordingly and that this metric is used to measure gains and losses to biodiversity resulting from development, and implement development plan policies on biodiversity net gain. Net gain specifically should derive strictly from habitat enhancement and creation, required as calculated using the metric, to be in line with para 174(b) of the NPPF which requires biodiversity net gains to be measurable.

Policy Theme 3 – Sustainable Design and Construction in the Built Environment

Natural England asks the council to consider providing a supplementary planning document that details guidance on how the relevant policies in the Wiltshire local plan will be applied to planning applications.

The guide is an important (material) consideration in helping to make decisions about planning applications. The information and guidance will be of particular use to developers, agents and architects looking to promote development sites in Wiltshire. It should provide practical advice to help developers comply with the Wiltshire Plan's sustainable design and construction requirements.

This guide should be read alongside other planning documents, in particular the Wiltshire Core Strategy, the Local Transport Plan and the councils emerging strategy papers for both GBI and Climate.

Policy Theme 4 – Sustainable Energy Generation and Management

Natural England support this policy theme. We support the requirement for new housing and commercial developments to include sustainable energy generation.

Natural England supports favoured policy for sustainable energy generation. This is consistent with the council's announcement of climate emergency. It should be made clear that green energy production although favoured does not override the ecological mitigation hierarchy and developments should not be counter intuitive to the recovery of nature. We recommend that the council identifies sites to put forward for sustainable energy generation and assess them under SA/SEA regulations and Habitats directives.

Policy Theme 5 – Sustainable Transport and Air Quality

We would expect the plan to address the impacts of air quality on the natural environment. In particular, it should address the traffic impacts associated with new development, particularly where this impacts on European sites and SSSIs. The environmental assessment of the plan (SA and HRA) should also consider any detrimental impacts on the natural environment, and suggest appropriate avoidance or mitigation measures where applicable.

Natural England advises that one of the main issues which should be considered in the plan and the SA/HRA are proposals which are likely to generate additional nitrogen emissions as a result of increased traffic generation, which can be damaging to the natural environment.

The effects on local roads in the vicinity of any proposed development on nearby designated nature conservation sites (including increased traffic, construction of new roads, and upgrading of existing roads), and the impacts on vulnerable sites from air quality effects on the wider road network in the area (a greater distance away from the development) can be assessed using traffic projections and the 200m distance criterion followed by local Air Quality modelling where required. We consider that the designated sites at risk from *local impacts* are those within 200m of a road with increased traffic³, which feature habitats that are vulnerable to nitrogen deposition/acidification. [APIS](#) provides

³ The ecological effects of diffuse air pollution (2004) English Nature Research Report 580
Design Manual for Roads and Bridges Volume 11, Section 3 Part 1 (2007), Highways Agency

a searchable database and information on pollutants and their impacts **on habitats and species**.

NPPF 181 states planning policies and decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and Clean Air Zones, and the cumulative impacts from individual sites in local areas. Opportunities to improve air quality or mitigate impacts should be identified, such as through traffic and travel management, and green infrastructure provision and enhancement. So far as possible these opportunities should be considered at the plan-making stage, to ensure a strategic approach and limit the need for issues to be reconsidered when determining individual applications. Planning decisions should ensure that any new development in Air Quality Management Areas and Clean Air Zones is consistent with the local air quality action plan.

Priority habitats, ecological networks and priority and/or legally protected species populations

The Local Plan should be underpinned by up to date environmental evidence. This should include an assessment of existing and potential components of local ecological networks. This assessment should inform the Sustainability Appraisal, ensure that land of least environment value is chosen for development, and that the mitigation hierarchy is followed and inform opportunities for enhancement as well as development requirements for particular sites.

Priority habitats and species are those listed under Section 41 of the Natural Environment and Rural Communities Act, 2006 and UK Biodiversity Action Plan (UK BAP). Further information is available here: [Habitats and species of principal importance in England](#). Local Biodiversity Action Plans (LBAPs) identify the local action needed to deliver UK targets for habitats and species. They also identify targets for other habitats and species of local importance and can provide a useful blueprint for biodiversity enhancement in any particular area.

Protected species are those species protected under domestic or European law. Further information can be found here [Standing advice for protected species](#). Sites containing watercourses, old buildings, significant hedgerows and substantial trees are possible habitats for protected species.

Ecological networks are coherent systems of natural habitats organised across whole landscapes so as to maintain ecological functions. A key principle is to maintain connectivity - to enable free movement and dispersal of wildlife e.g. badger routes, river corridors for the migration of fish and staging posts for migratory birds. Local ecological networks will form a key part of the wider Nature Recovery Network proposed in the 25 Year Environment Plan. Where development is proposed, opportunities should be explored to contribute to the enhancement of ecological networks.

Planning positively for ecological networks will also contribute towards a strategic approach for the creation, protection, enhancement and management of green infrastructure, as identified in paragraph 171 of the NPPF.

Where a plan area contains irreplaceable habitats, such as ancient woodland, ancient and veteran trees, there should be appropriate policies to ensure their protection. Natural England and the Forestry Commission have produced [standing advice](#) on ancient woodland, ancient and veteran trees.

Comments on Principle Settlements and Market town site selection reports

General comments on final proposed sites for assessment

During the site appraisal stage and before selecting which sites to take forward as allocations in the plan, the following may be useful to ensure opportunities for biodiversity net gain are secured:

- Does the site present significant risks to biodiversity? If so, have alternative sites with lesser impacts been explored?
- What site specific recommendations can help delivery biodiversity net gain, for example what further survey work may be required at the planning application stage?
- Whether the site can accommodate on-site biodiversity net gain provision or whether there is a need for off-site contributions? What types of habitat creation or enhancement are most

appropriate?

- Does there need to be any restrictions on the type of development that will be acceptable or particular parts of the site that should not be developed?

During the site selection process, potential sites should be judged in accordance with all policies in the NPPF, including selecting land with the least environmental value, where consistent with other policies. The Biodiversity Metric can be useful during this process to understand the opportunities on a site, test indicative biodiversity net gains and to ensure sites of high biodiversity value are not selected.

Natural England encourages developers, promoting sites for inclusion in the plan to use its Discretionary Advice Service, to discuss opportunities for biodiversity net gains on individual sites. This helps to ensure evidence is provided and appropriate ways to deliver biodiversity net gain can be included in site allocations if they progress. This can also help speed up the planning application stage. Further details on Natural England's Discretionary Advice Service is provided here.

Protected Landscapes – general comments

All development allocations, including those within settlements, should carefully consider impacts on the landscape and scenic beauty of the Protected Landscape (PL), including cumulative impacts and impacts on the settings of PL to ensure the highest status of protection is given to the PL, in line with NPPF para 172. We request that a Landscape and Visual Impact Assessment (LVIA) is carried out for allocations, particularly those outside of existing settlement boundaries, to assess the impacts on the character of the landscape and the visual impacts. Whilst such a LVIA would not be as detailed as one for a planning application, sufficient information e.g. on visual baseline, number of dwellings and key viewpoints are required to inform our advice. Allocations within the existing built up area may also benefit from a LVIA e.g. where extensive green spaces contribute to the character of the settlement, particularly when viewed from high points in an AONB and such views are recognised as one of the special qualities of the PL.

All development within PLs or their settings should:

- respect and enhance local landscape character;
- be of the highest design quality;
- include appropriate green infrastructure;
- incorporate appropriate enhancement measures e.g. landscape enhancement or access improvements, in line with the relevant NP/AONB Management Plan or local landscape character assessment. Biodiversity net gain should also be delivered (in line with a local plan policy/other local strategy).

Planning for Amesbury

Site 2 (SHELAA reference 3186)

Natural England advises this site supports a mixed area of both Deciduous Woodland and Lowland Fen (HQ7) registered under the Priority Habitat Index, we would advise that this site demonstrates significant sensitivities and should not be taken forward for further detailed assessment to allocate housing. Please see above comment on Priority habitats and species.

Site 3 (SHELAA reference S1054 & S1010)

Natural England does not hold any site specific survey data but the land at this site is highlighted provisionally as Grade 3 in the Agricultural Land Classification (ALC). Natural England advise that proposals at this site should not be permitted in the absence of site specific soil surveys to determine whether soils qualify as Best and Most Versatile (3a). Please refer to comment on soils and ALC below.

Planning for Bradford on Avon

Site 3 (SHELAA reference 739)

Natural England recognises that part of this site falls within flood risk zones 2 and 3. As a registered greenspace further consideration should be given to biodiversity value of this site and whether restoration/enhancement to priority habitats would be more appropriate. If this site should be successful in the next round of analysis then compensation should be considered for the degradation

or loss of a GI asset.

Planning for Calne

Site 2 (SHELAA reference 495 & 3610)

Individually this site may not demonstrate harm however cumulative impacts with site 3 and 4 may have potential to significantly impact on the setting of North Wessex Downs AONB.

Site 3 (SHELAA reference 488, 489, 451 & 3168)

Individually this site may not demonstrate harm however cumulative impacts with site 2 and 4 may have potential to significantly impact on the setting of North Wessex Downs AONB.

Site 4 (SHELAA reference 3642, 487, 1104 ((a, b, and c))

These sites represent a large increase in the overall settlement boundary to Calne. This represents a major encroachment on the boundary of the North Wessex Downs AONB. Natural England concurs with the SHELAA conclusion that development at this site is unlikely to be mitigated and would pose significant harm to the characteristics of the AONB.

The gravel pits to the North of these combined sites provide evidence that land in this area is of particular value in terms of soils. Natural England holds specific survey data to demonstrate that soil at the gravel pit north are [Grade 1 and 2](#) on the ALC. Please use the provided link for respective soil report and maps.

This would suggest that neighbouring land is of similar quality and should be safeguarded according to NPPF 170/171 and 118. Please see detail provided below on soils

All of the site above should be assessed individually and cumulatively for impacts on the North Wessex Downs AONB.

Planning for Corsham

All sites at Corsham have potential to impact on Bath and Bradford on Avon Bat SAC, sites 5 and 6 are also in close proximity to the Box Mine SSSI which is linked to the Bat SAC. Further detailed assessment is required for these sites so as to ensure that adverse impacts on habitat features that are used by bat species linked to the Bat SAC are avoided. Natural England notes the SAs conclusion that high level of growth are likely to have a significant adverse effect on biodiversity.

Site 5 (SHELAA reference 3034) This site extends beyond the built environment into priority habitat that is nestled between Corsham Railway Cutting SSSI and Box Mine SSSI a component SSSI of the International Bath and Bradford on Avon Bat SAC.

This site also encroaches on the Cotswolds AONB and in the absence of LVIA and based on the information provided Natural England does not support this site.

Planning for Chippenham

Site 1 (SHELAA reference 506b) This site demonstrates increased value for soils, Natural England holds specific survey data to demonstrate that soils at this location are of Best and Most Versatile quality at [ALC Grade 3a](#). When assessing this site further consideration should be given to the sites value to contribute to Wiltshire councils Climate strategy through carbon sequestration in soils.

Planning for Devizes

Site 1 (SHELAA reference 662) is directly adjacent to the North Wessex Downs AONB (consider advice above on development within the setting) and would encroach into an open landscape which although outside the AONB falls very much within this open downland landscape. To the North east a section of Pylons are part of a programme with National Grid to be undergrounded in the AONB, this will further enhance the open landscape.

This site would also restrict movement of mobile species in Lay Wood from the wider landscape to

the East.

Natural England in concurrence with the AONB and in the absence of LVIA does not support this site.

Site 2 (SHELAA reference 693a and 693b) As above this proposed site is directly adjacent to the AONB and having visited the site Natural England believe that this site poses the same restrictions as the site excluded from further assessment (SHELAA reference 549a). In the absence of LVIA Natural England therefore does not concur with the landscape assessment of 693a and 693b and does not support this site.

Site 3 (SHELAA reference 624) as above, this site is considered within the setting but it is believe through sensitive design impacts could be mitigated. Design would also have to take into account and where possible enhance the value of nearby allotment as a GI asset.

Planning for Malmesbury

Sites 4 and 5 (respective SHELAA references 691 and 502) both of these sites are in the setting of the Cotswolds AONB. Please see general commentary on proposed site allocations within the setting of nationally protected landscapes.

In the absence of LVIA Natural England does not concur with the SHELAA assessment for landscape.

Planning for Marlborough

It is unclear whether development in Marlborough will have an effect on water abstraction in the Kennet and Lambourn catchment, further consideration is required when considering allocation sites in this area and whether Water Quantity and the impacts on the Kennet and Lambourn SAC.

Site 1 (SHELAA reference 660 and 661) this site is within close proximity to the River Kennet SSSI and proposals should demonstrate how impacts will be avoided, if avoidance cannot be achieved mitigation should be sought. Applications should be accompanied with a flood risk assessment (FRA) highlighting how Greenfield run off rates will be maintained to ensure no impact on the River Kennet SSSI.

Development submissions at this site should be accompanied with Landscape Visual Impact Assessment (LVIA) to assess the impacts on the AONB.

The current visualisation (plan) within the NDP appears to neglect the value of the SSSI designation and does not demonstrate the particular requirement to avoid impacts. Natural England advise all impacts should be assessed before a masterplan is developed and agreed in consultation with Wiltshire Council and Natural England.

Site 2 (SHELAA reference MA2). The Eastern boundary of this site is dominantly priority habitat (see above advice on priority habitats and species).

The area around Savernake SSSI and specifically the disused railway tunnel has demonstrated that the Savernake SSSI is a nationally important Bat hibernation site and is of national importance for an internally protected bat species such as Natterers. Site 2 would constrain opportunities for improving landscape scale connectivity for the important bat populations as well as other key species (e.g. Duke of Burgundy and dormice etc). Natural England do not therefore support this site as an allocation in Marlborough.

Planning for Royal Wootton Bassett

Site 7 (SHELAA reference incomprehensible possible 498) Contains [Wootton Bassett Mud Springs](#) SSSI designated for its fluvial geomorphology. Further consideration/assessment for this designation is required before allocating in the local plan.

Planning for Salisbury

General comment on development in Salisbury

The council needs to consider whether development at the proposed allocation sites fits within the strategic solution for the River Avon SAC catchment. For those sites that do not fit within the councils criteria for consideration in the strategic AA proposals will be required to demonstrate nutrient neutrality.

All sites considered in the final pool for assessment have potential to impact on the River Avon International Site.

Sites 6, 7 and 8 will also need to consider recreational impacts on the New Forest International site.

Sites 6 (SHELAA S159) is directly adjacent to [East Harnham Meadows SSSI](#), development at this site and potential impacts from recreational and air quality on the grassland communities should be considered prior to allocation.

Natural England holds [site specific reports and maps](#) highlighting the value the site contributes to the councils objective to become carbon neutral by 2030. This site is valued as Grade 2 Best and Most versatile soils in the Agricultural Land Classification. Please see general comments on the value of soils below.

Natural England has been made aware that this site demonstrates significant issue with surface and ground water, based on this evidence we do not concur with the Stage 2 assessment for flood risk.

Natural England does not concur with the SA scoring for biodiversity, we believe that the sites proximity international and nationally designated sites, it's sensitivities to water run-off and ground water change do not represent a minor adverse effect. Natural England would consider this is likely to be major and the scoring should be reassessed.

Based on the information available Natural England does not support progressing this site as a preferred option site.

Site 7 (SHELAA 3423, 3461)

Alone this site may not represent a concern, however when combined with site 6 there may be an increase in local recreation pressure on the nearby accessible [Britford Water Meadows SSSI](#). Development of this site would also lead to the ecological isolation of a nearby local wildlife site. Any allocation would need to ensure these potential impacts are avoided through design and support for the management of recreational activity on the SSSI.

Site 8 (SHELAA reference 3421) similarly to site 7 mentioned above the inclusion of this site isolates a local wildlife site. Cumulative impacts are factored in to the SA scoring and should be amended and adjusted accordingly.

Planning for Tidworth and Ludgershall

Site 1 (SHELAA reference 3498) Is within the setting of the North Wessex Downs AONB. Please see general comments on landscape and development within the setting of nationally designated landscapes. A site visit around this site has led to the determination that LVIA is required to determine the impacts development would have on the AONB however Natural England considers that part of this site could deliver housing, whilst part could form a valuable buffer to the AONB

Sites 4 and 5 are considered major allocations and stage 4 assessment should be accompanied with LVIA.

Site 5 (SHELAA references 2064, 2065, 2066) contain a significant area of deciduous woodland (namely the Newdrove Plantation) proposal at this site should aim to retain priority habitat and aim to enhance the ecosystems services provided. Natural England advise that this cluster of sites should be accompanied with an overarching masterplan that integrates multi-functional green infrastructure.

Planning for Trowbridge

Natural England notes the final pool of assessment sites. It is noted that sites 4, 5 and 6 demonstrate

potential issues for bat species. Both preferred sites (4 and 5) are within a medium risk area known as the Hilperton Gap and would constrain opportunities for landscape scale ecological connectivity with the Kennet and Avon Canal.

Further assessment of all three site individually and cumulatively on important bat populations is required before Natural England can make a determination on the suitability of these proposed allocation sites for the area of Trowbridge.

Planning for Warminster

Site 9 (SHELAA reference 3676) encroach in the rural landscape and appears to impact on ecological connectivity in the locality. Further assessment required to determine impacts on mobile species and overall biodiversity impact.

All proposed allocation fall within the zone of influence for the Salisbury Plain SPA strategic solution.

Planning for Westbury

Site 6 (SHELAA reference 1011) The Proposals for a bypass to the east of Westbury were rejected by inspector on the grounds of unacceptable landscape impact. As such, on the face of it, this proposal would seem to be at least as damaging, to meet a need that could be accommodated elsewhere.

We welcome that this has been noted in the Site selection report, and advise that a LVIA is undertaken to assess the impact in detail.

Site 10 (SHELAA reference) As stated this site has a good network or PRow and proposals would need to demonstrate no net detriment to the local GI asset.

Further advice

Green Roofs

Natural England is supportive of the inclusion of living roofs in all appropriate development. Research indicates that the benefits of green roofs include reducing run-off and thereby the risk of surface water flooding; reducing the requirement for heating and air-conditioning; and providing habitat for wildlife.

We would advise your council that some living roofs, such as sedum matting, can have limited biodiversity value in terms of the range of species that grow on them and habitats they provide. Natural England would encourage you to consider the use of bespoke solutions based on the needs of the wildlife specific to the site and adjacent area. I would refer you to <http://livingroofs.org/> for a range of innovative solutions.

Access and Rights of Way

Natural England advises that the Plan should include policies to ensure protection and enhancement of public rights of way and National Trails, as outlined in paragraph 98 of the NPPF. Recognition should be given to the value of rights of way and access to the natural environment in relation to health and wellbeing and links to the wider green infrastructure network. The plan should seek to link existing rights of way where possible, and provides for new access opportunities. The plan should avoid building on open space of public value as outlined in paragraph 97 of the NPPF.

The plan should make provision for appropriate quantity and quality of green space to meet identified local needs as outlined in paragraph 96 of the NPPF. Natural England's work on [Accessible Natural Greenspace Standard \(ANGSt\)](#) may be of use in assessing current level of accessible natural greenspace and planning improved provision.

Soils

Soil and Agricultural Land Quality

The Local Plan should give appropriate weight to the roles performed by the area's soils. These should be valued as a finite multi-functional resource which underpin our wellbeing and prosperity. Decisions about development should take full account of the impact on soils, their intrinsic character and the sustainability of the many ecosystem services they deliver, for example:

1. Soil is a finite resource that fulfils many important functions and services (ecosystem services) for society; for instance as a growing medium for food, timber and other crops, as a store for carbon and water, as a reservoir of biodiversity and as a buffer against pollution. It is therefore important that the soil resources are protected and used sustainably. The [Natural Environment White Paper](#) (NEWP) *'The Natural Choice: securing the value of nature'* (Defra, June 2011), emphasises the importance of natural resource protection, including the conservation and sustainable management of soils, for example:
 - A Vision for Nature: 'We must protect the essentials of life: our air, biodiversity, soils and water, so that they can continue to provide us with the services on which we rely' (paragraph 2.5).
 - Safeguarding our Soils: 'Soil is essential for achieving a range of important ecosystem services and functions, including food production, carbon storage and climate regulation, water filtration, flood management and support for biodiversity and wildlife' (paragraph 2.60).
 - 'Protect 'best and most versatile' agricultural land' (paragraph 2.35).

2. The conservation and sustainable management of soils also is reflected in the [National Planning Policy Framework](#) (NPPF), particularly in paragraphs 170 and 171. When planning authorities are considering land use change, the permanency of the impact on soils is an important consideration. Particular care over planned changes to the most potentially productive soil is needed, for the ecosystem services it supports including its role in agriculture and food production. Plan policies should therefore take account of the impact on land and soil resources and the wide range of vital functions (ecosystem services) they provide in line with paragraph 118 of the NPPF, for example to:
 - Safeguard the long term capability of best and most versatile agricultural land (Grades 1, 2 and 3a in the Agricultural Land Classification) as a resource for the future.
 - To avoid development that would disturb or damage other soils of high environmental value (e.g. wetland and other specific soils contributing to ecological connectivity, carbon stores such as peatlands etc) (*See comments below on biodiversity and geodiversity*), and, where development is proposed.
 - Ensure soil resources are conserved and managed in a sustainable way.

3. To assist in understanding agricultural land quality within the plan area and to safeguard 'best and most versatile' agricultural land in line with paragraphs 170 and 171 of the National Planning Policy Framework, strategic scale Agricultural Land Classification (ALC) Maps are available. Natural England also has an archive of more detailed ALC surveys for selected locations. Both these types of data can be supplied digitally free of charge by contacting Natural England. Some of this data is also available on the www.magic.gov.uk website. The planning authority should ensure that sufficient site specific ALC survey data is available to inform decision making. For example, where no reliable information was available, it would be reasonable to expect that developers should commission a new ALC survey, for any sites they wished to put forward for consideration in the Local Plan

4. General mapped information on soil types is available as 'Soilscapes' on the www.magic.gov.uk and also from the LandIS website <http://www.landis.org.uk/index.cfm> which contains more information about obtaining soil data.

5. Further guidance for protecting soils (irrespective of their ALC grading) both during and following development is available in Defra's [Construction Code of Practice for the Sustainable Use of Soils on Construction Sites](#), to assist the construction sector in the better protection of the soil resources with which they work, and in doing so minimise the risk of environmental harm such as excessive run-off and flooding. The aim is to achieve positive outcomes such as cost savings, successful landscaping and enhanced amenity whilst maintaining a healthy natural environment, and we would advise that the Code be referred to where relevant in the development plan.

Tranquillity

The Local Plan should identify relevant areas of tranquillity and provide appropriate policy protection to such areas as identified in paragraph 100 and 180 of the NPPF.

Tranquillity is an important landscape attribute in certain areas e.g. within National Parks/AONBs, particularly where this is identified as a special quality. The CPRE have mapped areas of tranquillity which are available [here](#) and are a helpful source of evidence for the Local Plan and SEA/SA.

Gypsy and Traveller Local Plan

Natural England have no comments to make on this consultation at this stage. Once sites have been selected please re-consult Natural England.

For any new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk

If you have any queries relating to the advice in this letter please contact me directly.

Yours sincerely



Conservation and Planning Lead
Wessex Team

Annex A – Climate Change Adaptation

We have put together the following list of resources that can help to embed climate change adaptation into the Local Plan:

The [Sixth Carbon Budget](#) is a report based on a programme of analysis by the Climate Change Committee (CCC) that builds on evidence published in 2020 for Net Zero advice. To support the advice CCC have produced;

- A [Methodology Report](#), setting out the evidence and methodology behind the scenarios.
- A [Policy Report](#), setting out the changes to policy that could drive the changes necessary particularly over the 2020s.
- a [separate dataset](#) for the Sixth Carbon Budget scenarios, setting out detail and data on the pathways that can be included.

<https://www.theccc.org.uk/publication/sixth-carbon-budget/>

- The [Climate Change Adaptation Manual](#) provides extensive information on climate change adaptation for the natural environment. It includes the Landscape Scale Climate Change Assessment Method that can help people through an assessment of the impacts and vulnerabilities of their natural environment features and the adaptation they can plan. There are sections on habitats, species, green infrastructure, access and recreation and geology and geomorphology.
- The [Nature Networks Evidence Handbook](#) – again, a repository for our current evidence, tools and action regarding nature networks, it contains practical suggestions for designing and delivering a network and there is a practitioners version.
- A range of spatial data including - [National Biodiversity Climate Change Vulnerability Assessment](#) (NBCCVA), National Habitat Network, [Species Risks and Opportunities](#) climate envelope modelling, etc. These datasets are included in the Landscape Scale Climate Change Assessment Method in the Climate Change Adaptation Manual, the Data and Tools chapter in the Nature Networks Evidence Handbook and NRN toolkit list. Furthermore, the fragmentation metric of the NBCCVA tool provides the Biodiversity and Connectivity Tool within the Biodiversity Metric of Net Gain.
- A range of introductory climate change webinars ([Natural England Climate Change webinars](#)) are available on our YouTube channel. The following are planning and climate change documents which looked at climate change, species responses, ecological networks and spatial planning:
 - Climate Change and Biodiversity Adaptation: The Role of the Spatial Planning System (NECR004) <http://publications.naturalengland.org.uk/publication/41006?category=10003>
 - Making space for wildlife in a changing climate (NE263) <http://publications.naturalengland.org.uk/publication/47002?category=10003>
 - Spatial planning for biodiversity in our changing climate (ENRR677) <http://publications.naturalengland.org.uk/publication/63010?category=10003>

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██████████
Spatial Planning
Wiltshire Council
County Hall
Bythesea Road
Trowbridge
Wiltshire
BA14 8JD

Our ref: WX/2009/110257/CS-13/IS1-L01
Your ref: Local Plan Review
Date: 09 March 2021

Dear ██████████

Local Plan Review

Thank you for consulting the Environment Agency on the Wiltshire Local Plan Review. We will respond separately to the Gypsies and Travellers DPD. We provide advice by topic headings, followed by a list of proposed development sites that raise concern for us.

Climate Change

We are pleased to see this issue has been given its own document. This demonstrates a commitment to your Council's declaration of a Climate Emergency and acknowledges it as the all-encompassing issue that it is.

Water Sensitive Urban Design

We would encourage you to familiarise yourself with the concept of Water Sensitive Urban Design (WSUD). This concept should be woven throughout the whole Local Plan and includes elements of each of the below topic headings (although it is not limited to these). The following CIRIA guidance document provides useful information on the concept and how to apply it in urban planning - [wsud_ideas_book.pdf \(susdrain.org\)](http://wsud_ideas_book.pdf(susdrain.org))

Flood Risk

Strategic Flood Risk Assessment (SFRA)

Whilst we are satisfied that the overall proposals accord with the principles in the NPPF, we would remind you of the need to undertake the Sequential Test for all the proposed site allocations against the flood risk criteria identified in the Wiltshire SFRA Level 1, i.e. all sources of flooding.

We note that many of the sites presented include areas of flood zone 1, 2 and 3, therefore implying that the Sequential Approach will be used in designing site layout.

Environment Agency
Rivers House, Sunrise Business Park, Higher Shaftesbury Road,, Blandford, Dorset, DT11 8ST.
Customer services line: 03708 506 506
www.gov.uk/environment-agency

Cont/d..

We encourage you to be explicit about this in the policy text to ensure readers understand this.

We would highlight that the SFRA Level 1 has not undertaken further detailed flood modelling to establish the climate change extents over the development's lifetime for these allocations that include flood zones. Therefore, we would recommend that SFRA Level 2 is considered for the large strategic allocations which are in proximity to flood zones 2 and 3. This would offer an increased level of certainty over the developable area and consider all sources of flood risk including climate change.

Given the uncertainties above, and in the absence of SFRA Level 2s, we would advise for those sites where there is a current flood risk shown within the potential development boundary that the housing numbers are stated as 'up to xxxx dwellings'. This then allows for any associated changes in updated flood data that may be produced with in a site specific flood risk assessment (FRA), or through updated river modelling by the Environment Agency. This is especially important as the amount of developable area could significantly reduce if climate change flood maps are produced, and show significantly larger flood outlines to our currently published flood map for planning.

Flood Risk Policy

We would recommend that any final flood risk policy does more than replicate national planning policy. We would recommend that additional elements are included in any local flood risk policy. These approaches have been undertaken elsewhere in Wessex. Below are examples of some policy elements that should be included.

- *The Council will support the relocation of existing highly vulnerable development (such as park homes) and essential infrastructure on land at risk from flooding provided:*
 - *the existing development is lawful;*
 - *the site for relocation is at a lower flood risk ;*
 - *the size of any replacement buildings or the application site are not materially larger than the existing buildings or site;*
 - *the type, scale and location of the replacement development is consistent with relevant planning policies; and*
 - *the applicant provides for the suitable restoration of the existing site.*
- *Unless agreed with the Environment Agency, development will not be permitted within an 8 metre buffer around an existing flood alleviation scheme or main river.*
- *The council will support planning applications for new flood defence and flood management schemes providing they accord with the relevant planning policies.*

Infrastructure

Where the proposed development relies on the existing community facilities and infrastructure that is at risk of flooding, developers should be required to contribute (via Infrastructure DPD/CIL) towards securing these facilities over the lifetime of the development. This partnership funding approach is likely to be essential in development and growth being considered sustainable, and securing the benefits of the wider community.

We would suggest that infrastructure in the river corridor is identified when it is in proximity to new growth. This can then be integrated into the master planning of these strategic allocations to deliver the flood risk and environmental benefits required.

Blue/Green Infrastructure

We are pleased to see the climate emergency being linked to blue/green infrastructure. We look forward to reviewing and engaging in the emerging Blue/Green Infrastructure policy document when this is available, as this will provide a critical element of the Local Plan.

It is important that blue green infrastructure is considered as a connected network across the county, and beyond, to allow a significant and meaningful impact from this work. This will allow floodplains to be better connected and increase green spaces for people and wildlife.

Within those proposed development sites that have floodplain as part of their development boundary there is an opportunity to link up the proposed areas of country park to have a more significant environmental feature that deliver extensive environmental, wellbeing and economic benefits to the region.

Therefore, we would recommend that the main rivers in the county should be considered as part of linear country park / open space. This would provide the opportunity to join the growth in towns to other areas along river corridors. We acknowledge that it would need to be carefully designed and interests managed, but could offer significant alignment of environmental benefits (including flood risk). An example of this is on the lower reaches of the River Stour, which forms part of the BCP and Dorset Council areas, which is looking to establish a 20km linear area for multiple uses around the river corridor and floodplain.

Carbon Net Zero

The Blue/Green Infrastructure has a real opportunity to link with and deliver against Carbon Net Zero targets. The opportunity for carbon sequestration through wetlands, improved floodplain connection, wet woodlands, etc. should be considered within the approach for carbon net zero development. Our soils are one of the biggest carbon sinks available to reduce climate change therefore we suggest the concept of building soil depth and quality could be included in this section. The prevention of further soil depletion through runoff, at the very least, should be included. Sustainable land management practices will play a large role in this, including within any new country park areas, such as in Chippenham.

Other sources of flood risk

We would also highlight that the Lead Local Flood Authority should provide the relevant advice in regards to surface water and groundwater, as well as local knowledge on ordinary watercourse flood risk. In Core policy 67: flood risk of the adopted Wiltshire Core Strategy (Section 6.181) reference is made to a document called Sustainable Drainage Systems: an introduction, published by the Environment Agency. This document is now 18 years old. It would be better to refer to a more up-to-date document and also link it back to Water Sensitive Urban Design as this concept (document linked above) is more holistic and will achieve many more cross-cutting sustainable outcomes than SuDS alone.

Canals

If your local plan policy wishes to support the new canal connection, and use of the River Avon, in Melksham for this proposal you should consider the need to undertake a SFRA Level 2 for this infrastructure project. This scheme has potential for impacting on the community and therefore a SFRA Level 2 could assist in the integration of the navigational requirements and flood risk in the town.

Both Melksham and Royal Wootton Bassett have the historic lines of the Wiltshire and Berkshire canal running through some sites, we would advise that the River and Canal trust would need to comment on these sites as the flood risk associated with the old canal route will vary even within sites and may affect the potential location of housing and other development.

Natural Flood Management

We support the reference to natural flood management in the last bullet point of policy theme 1. However, we would prefer the removal of the words 'where necessary' as we would argue that natural flood management is always necessary, as it is a holistic concept and is most effective when not limited to individual development sites. It links closely to Water Sensitive Urban Design as mentioned above, and to the preservation and building of soils (above).

Groundwater Protection

Source Protection Zones (SPZs)

When allocating new development sites we advise that new buildings are located outside SPZ1 – the zone of highest vulnerability to pollution. Where this is not possible only the least polluting activities should be allowed, for example public green spaces could be orientated in these locations. Policy 68 of the adopted Wiltshire Core Strategy (section 6.185) includes reference to protecting SPZs. We would encourage you to be more specific in any updated policy wording, steering built development outside SPZ1. Reference to a document called 'Groundwater Protection: Policy and Practice' should be updated to refer to 'The Environment Agency's approach to groundwater protection', February 2018 Version 1.2 - [The Environment Agency's approach to groundwater protection \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/684242/groundwater-protection-policy-and-practice.pdf)

Where mains surface water drainage is not possible, high quality SuDS systems will ensure developments within SPZ2 and 3 do not contribute to the pollution of controlled waters, including groundwater. These should be designed to be passive in order to prevent potential degradation in the event that maintenance is not carried out.

Groundwater Quantity & Water Resources

Specific Water Resource pressures are known to exist across much of the Wiltshire Area, including but not limited to Hampshire Avon, Bristol Avon, including Malmesbury Avon area, Bradford on Avon etc. Development in these areas should be conditioned to use the most water efficient technologies to reduce the water supply demands. Policy theme 1 refers to this idea directly - All new development should be designed in a manner that limits the daily consumption and disposal of water – whilst Policy theme 3 refers to sustainable design & construction, of which water efficiency could fit within. Wherever you wish to position water efficiency within your policy we would strongly encourage you to be specific about water use standards in new development. Currently this is enforced by Building Regulations part G, and limits water use to 125 litres per person per day. This has not kept pace with our need to address climate change, therefore the revised Local Plan should aim to better these regulations. (We are aware that Wiltshire Council specify 110 litres per person per day, but this is inconsistent across the Council area, and no longer low enough). We would argue that specifying a water use limit of 95 litres per person per day in new residential development would be entirely appropriate, for many reasons. It would contribute significantly to meeting objectives relating to carbon net zero, biodiversity protection, Hampshire Avon SAC protection, groundwater protection and more. As part of Policy theme 3 – sustainable design – it states "Such standards would need to be clear, easily implemented and not

put at risk the viability of development". Specifying 95 litres per person per day (as submitted in a water use calculator as part of planning applications) would be clear, easily implemented (using modern fittings/appliance technology) and would not risk the viability of development.

Notwithstanding the above, Wiltshire Council should ensure sufficient water resource supply headroom exists for development to take place, without having an adverse impact on the water environment and Hampshire Avon SAC.

As part of Policy theme 3 it is stated "All new development should support the collection and re-use of rainwater and grey water". We are unsure what this would really mean for a development. How does a development *support* rainwater collection if it is not required to *include* it? We would advise the use of the word 'include' instead of 'support', and the policy should include how this could be achieved.

Biodiversity

In the document called 'Addressing climate change and biodiversity net gain through the Local Plan' it is stated under Policy theme 1 that "...new built development should be in Flood Zone 1". However, many sites contain areas within Flood zones 2 & 3. Whilst there may not be an intention for 'built' development in these areas, any alterations within floodplains (landscaping/gardens, formal parks etc.) may give rise to unwanted impacts and lead to the disconnection of wildlife corridors. Areas within zones 2 & 3 should not be included within the area for built development to ensure that they continue to function as natural river floodplains without modifications. Also see section on blue/green infrastructure above. Dedicating these areas to blue/green infrastructure, such as linear country parks, can complement new developments whilst safeguarding the use of that land for flood management, biodiversity net gain, recreation, wellbeing etc.

Where there is described as 'a medium risk of flooding', and 'management measures are achievable', it is not clear what's meant by 'management measures' and how these are demonstrated to be achievable. We suggest this is expanded upon.

We would encourage you to require the biodiversity net gain element in new developments to be more ambitious than 10%. Following the climate and ecological emergency your Council has declared you could require a minimum of 20%. This would align with the Environment Agency's principle that our future flood risk management schemes will need to achieve a 20% biodiversity net gain.

A connected network for wildlife needs to be created across Wiltshire (and into surrounding areas) to prevent pockets of isolated biodiversity improvement. The creation of this network can be integrated with recreation, non-motorised transport, wellbeing, flood risk management and Water Sensitive Urban Design so that the network has multiple functions and benefits.

The document does not include any reference to Nature Recovery Network (NRN). The NRN is a major commitment in the [government's 25 Year Environment Plan](#) and part of the forthcoming Nature Strategy. Local policy should link to this commitment as it is expected that it will be delivered at district level - [Nature Recovery Network - GOV.UK](#)

Pollution Prevention

Adopted Core Policy 69 details measures required to protect the Hampshire Avon SAC from nutrient pollution. It will be necessary to update this policy to reflect the most

recent agreement made between Wiltshire Council, the Environment Agency and Natural England.

Site Specific Policy Documents

Chippenham

Chippenham has significant growth over the planned period. Whilst the sites selected appear to be adopting the sequential approach by being located in the low flood risk areas, there will be significant infrastructure requirements (such as bridges) that will cross the floodplain and the main river. The development of the infrastructure must not increase flood risk, and under National Planning Policy should be delivering flood risk betterment for the existing community and new development.

In addition the Chippenham River/Country Park should look at the opportunity to provide a longer length of park through the town and beyond. This should include the consideration of long term options to replace the radial gate and weir in the town centre that are near the end of their design lives. This would improve biodiversity (especially fish passage), provide increased amenity value and enable increased planting within the river corridor. It will also reduce the risk of flooding to the town centre if the radial gate were to fail in the future. This will also help mitigate the impacts of climate change. The Environment Agency is currently looking at the long term future of the radial gate in Chippenham, therefore including a policy to replace the radial gate and weir within this Framework document would support any future necessary project in this location.

Marlborough

Whilst site 660 and 661 (called site 1 in final pool) lie in Flood Zone 1 we would recommend that the following text is added specifically for Site 1: Land at Chopping Knife Lane within the Planning for Marlborough report:

The site lies adjacent to the floodplain associated with the River Kennet. Proposals for the development of the site will need to consider the effect of climate change on the fluvial flood levels from the river as they may affect lower areas on the site. The Environment Agency have a hydraulic model of the River Kennet at this location and they should be consulted when planning the development layout. Buildings on the lower part of the site should be made flood resilient. Climate change factors applied to fluvial flood flows should be in accordance with the National Planning Policy Framework and its guidance.

Development Site 2/ma1 lies almost entirely within SPZ 1 for Marlborough public water supply borehole. We recommend this site is eliminated and a more suitable alternative site found.

Amesbury, Salisbury, Warminster, Devizes

These areas are within the Hampshire Avon catchment which is currently failing protected area and WFD objectives because of elevated phosphorus. Increased phosphorus levels that may reach the Hampshire Avon as a result of the development should be offset in line with the Environment Agency and Natural England Hampshire Avon Nutrient Management Plan, Memorandum of Understanding and Local Authorities Supplementary Planning documents and other relevant documents/agreements.

Salisbury

In line with our comments above on SPZs, please reconsider the allocation of Site 1 and site 12. Where possible development should take place outside SPZs. A sequential

approach should be applied, developing all available sites outside SPZs first, then using sites in SPZ3 and so on (similar to allocating sites based on the level of flood risk). Development site 1, is on the edge of Deans Farm SPZ1. This however is further from SPZ1 than the land highlighted in grey to the west of this site. Site 12 is on the edge of Devizes Road SPZ 2 and 3.

Tidworth & Ludgershall

Any water abstracted in the Tidworth area and supplied by Veolia Tidworth abstractions, should be discharged back to the catchment and to Tidworth Sewage Treatment Works, to reduce the impact on Hampshire Avon SAC. This should be included in revised Core Policy 69 – Protection of the Hampshire Avon SAC.

Warminster

Part of Site 9 is within SPZ 1 for Arn Hill Boreholes. Ideally this site should be removed for pollution prevention reasons (as explained above).

Sites 5-8 are within SPZ 2-3. Measures should be taken to reduce the risk of contamination of Warminster Malting Public Water Supply boreholes. Could these developments be located outside these zones?

Melksham & Royal Wootton Bassett

In Melksham and Royal Wootton Bassett the policy states 'areas to be safeguarded for the restoration of the Wilts & Berks Canal' - it would be more accurate to say 'potential restoration' at this stage, as no planning permission has been granted for these projects yet.

We hope you find the above advice helpful. We look forward to being consulted on future versions of the revised Local Plan for Wiltshire.

Yours sincerely

████████████████████

Sustainable Places - Planning Advisor

Direct dial

████████████████████

E-mail

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Wiltshire Local Plan review consultation March 2021

Thank you for providing Historic England an opportunity to consider this consultation relating to the amount and distribution of new homes and land for employment; neighbourhood planning; climate change and biodiversity net gain.

Our following comments supplement those previously made in our letter of 18 December 2017 which mainly emphasised the need for any review to consider the current state of Wiltshire's historic environment and how its planning documents had performed regarding the delivery of a positive strategy for the historic environment (NPPF para 185). The scope of your proposals in this consultation may well have followed a review of how the current plan(s) have met their objectives, and how they have performed in relation to the delivery of sustainable development in respect of the historic environment. Is this evaluation available to view?

Our consultation response is informed by Historic England advice and guidance which you may also find useful in helping to provide a clear and positive strategy for the conservation, enjoyment and enhancement of Wiltshire's rich and varied historic environments.

- **The Historic Environment in Local Plans**
<https://historicengland.org.uk/images-books/publications/gpa1-historic-environment-local-plans/>
- **How to consider the Setting of Heritage Assets**
<https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/>
- **Considering the historic environment when allocating sites in Local Plans**
<https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/>
- **Neighbourhood Planning and the historic environment**
<https://historicengland.org.uk/advice/planning/improve-your-neighbourhood/>
- **Conservation Area Appraisal, Designation and Management**
<https://historicengland.org.uk/images-books/publications/conservation-area-appraisal-designation-management-advice-note-1/>
- **Optimising housing density within historic places**
<https://historicengland.org.uk/images-books/publications/increasing-residential-density-in-historic-environments/>

The 'Emerging Spatial Strategy'

The emerging spatial strategy indicates the proposed amount of new homes and land for employment that each main settlement should accommodate. We understand this has been informed by evidence including place-based assessments in *Formulating Alternative Development Strategies*, January 2021 (ADSs). These consider the (Red, Amber, Green) capacity of settlements in relation to historic environment, but you accept that such initial broad judgements may require further detailed evaluation.

We would support the Council's efforts to identify and allocate all brownfield sites, big and small, to help reinforce the often-compact nature of Wiltshire's historic settlements, their character and identity in an appropriate response to context, and in turn limiting sprawl and less accessible forms of development.

Having considered the suggested potential sites in each of the 15 x *Planning for...* reports we are concerned there may not be the capacity for every settlement to meet the spatial strategy commitments and levels of growth you envisage without causing significant harm to the historic environment, inconsistent with legislation, national policy, guidance and advice, rendering the spatial strategy relatively unsustainable, and the Local Plan potentially unsound.

National policy requires that significant adverse impacts on heritage assets be avoided and, wherever possible, alternative options employed that reduce or eliminate such effects. Consequently, we would welcome the Council's clarification that this draft spatial strategy does not predetermine the capacity of every settlement and that further evidence (e.g. additional more detailed evaluation of heritage and landscape capacity) may inform a review of those numbers and perhaps the inclusion of other sites in other settlements in that particular HMA or an adjacent HMA.

Historic England appreciates an initial level of evidence has been gathered and applied proportionate to an early 'sift' of sites. However, we also note that Wiltshire Council acknowledge further assessment and consideration of the historic environment is essential to determine whether or not the principle of certain sites is acceptable, and if so, the form they may take. This is an important matter as having considered the 15 Settlement reports we note several potential sites directly affect designated heritage assets and their settings.

At present without such evidence in the public domain, Historic England is unable to provide a fully informed view on whether sites affecting heritage assets are likely to safeguard their significance, and as such if the Local Plan has been prepared in accordance with legislation, national policy, guidance and advice for the historic environment. Our judgement on individual sites and such matters will consequently need to be deferred until that further evidence is available.

Nevertheless, for the time being, we have considered a sample of the suggested sites at Salisbury that we hope will help indicate, in our opinion, their potential suitability and the form of the further evidence that would be helpful for all other settlements. Please refer to an appendix to this letter for such an evaluation and response to the individual questions relating to each of the 15 settlements.

Neighbourhood Planning

We note that smaller village communities will be encouraged to identify their specific local housing requirements when preparing a Neighbourhood Plan (NP) and where a NP is not being prepared the Council has the option of allocating sites through a review of the Local Plan.

We note and welcome the Council's commitment to produce guidance for NP communities on site selection and framing proposals within their Plans that will help to ensure the historic environment is appropriately considered. Historic England would welcome the opportunity to help in the preparation of such clear and effective advice.

We look forward to continuing to work constructively with you on this important planning document.

Sincere regards.

[Redacted signature line]

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South West Historic Environment Planning Adviser
Historic England

[Redacted signature line]

Appendix: Historic England response to the individual settlement proposals and related questions

Settlement	Historic England comment
<p>Planning for Amesbury</p>	<p>It will be important to demonstrate how proposals have considered and responded to the historic environment, the town's history, character, below round archaeology and landscape setting. The Amesbury Conservation Area Appraisal and Management Plan is now 13 years old; to ensure the Local Plan is informed by up to date information about the historic environment it seems timely that this document is perhaps updated and supplemented by a setting assessment, mindful of the towns significant historic landscape context and proposed expansion.</p>
	<p>AM1. What do you think to this scale of growth? Should there be a brownfield target? Should it be higher or lower?</p> <p>Historic England considers that the character of the historic settlement, within its wider landscape setting, and the availability of suitability sites should inform the proposed scale and form 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 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) and the future form ensuring a good fit with the townscape. An accurate capacity can be informed by an updated Conservation Area Appraisal.</p>
	<p>AM2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?</p> <p>An updated Amesbury Conservation Area Appraisal and Management Plan and or 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).</p>
	<p>AM3. Is this the right pool of potential development sites? Are there any other sites we should be considering?</p> <p>An updated Conservation Appraisal and setting assessment can inform the availability of suitable development sites.</p> <p>Disclaimer – Historic England have not undertaken a detailed assessment of the suggested sites in and around Amesbury due to the additional evidence proposed to be gathered. We therefore respectfully reserve judgement on their suitability.</p>
	<p>AM4. What land do you think is the most appropriate upon which to build? What type and form of development should be brought forward at the town?</p>

	<p>An understanding of the history, character, identity, appearance and landscape setting should inform the level of growth and site suitability in accordance with national policy. Historic England's published advice on site allocations may be helpful. https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/</p> <p>Up to date Conservation Appraisals and setting assessments will also help inform this exercise.</p>
	<p>AM5. Are there important social, economic and environmental factors you think we've missed that need to be considered, generally or in respect of individual sites?</p> <p>The information accompanying the consultation in the Settlement Profile does not appear to set out how a strategic understanding of the history, character and landscape setting has informed the spatial distribution, capacity and specific allocations proposed. To do so a heritage topic paper for each settlement is recommended including a strategic landscape setting assessment and up to date Conservation Area Appraisal to inform brownfield and place shaping opportunities.</p> <p>Any further site assessment should be independent and robust, and undertaken or commissioned by the local planning authority rather than relying solely on evidence provided by a site promoter.</p>
Planning for Bradford on Avon	<p>It will be important to demonstrate how proposals have considered and responded to the historic environment, the town's history, character and landscape setting. Bradford on Avon doesn't appear to have a Conservation Area Appraisal and Management Plan and the towns character assessment is now 13 years old. The Council should consider whether an update is required, and also a setting assessment to inform edge of town expansion.</p>
	<p>BR1. What do you think to this scale of growth? Should there be a brownfield target? Should it be higher or lower?</p> <p>The form and character of the historic settlement, within its wider landscape setting, and the availability of suitability 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) and the future form ensuring a good fit with the townscape. An accurate capacity can be informed by an up to date Conservation Area Appraisal.</p>
	<p>BR2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?</p> <p>A Bradford on Avon Conservation Area Appraisal and Management Plan and or Heritage Topic Paper can help to inform such priorities and in doing so demonstrate a positive</p>

	<p>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).</p>
	<p>BR3. Is this the right pool of potential development sites? Are there any other sites we should be considering?</p> <p>The Council should consider whether a Conservation Appraisal and setting assessment is required to inform the promotion of suitable development sites.</p> <p>Disclaimer – Historic England has not undertaken a detailed assessment of the suggested sites at Bradford on Avon due to Wiltshire Council’s intention to provide further evidence. We therefore reserve judgement until then.</p>
	<p>BR4. What land do you think is the most appropriate upon which to build? What type and form of development should be brought forward at the town?</p> <p>An understanding of the history, character, identity, appearance and landscape setting should inform the level of growth and site suitability in accordance with national policy. Historic England’s published advice on site allocations may be useful. https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/</p> <p>An up to date Conservation Appraisal and setting assessments, where appropriate, can help inform the Plan.</p> <p>It would be helpful to appreciate the judgements of the Council’s in-house heritage and landscape expertise, and any germane planning history. This information will be useful in relation to all 15 settlements.</p> <p>It will be important to be mindful of legislation, national policy, guidance and advice for the historic environment.</p>
	<p>BR5. Are there important social, economic and environmental factors you think we’ve missed that need to be considered, generally or in respect of individual sites?</p> <p>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 for each settlement is recommended including a strategic landscape setting assessment and up to date Conservation Area Appraisal to inform brownfield capacity and place shaping opportunities.</p> <p>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.</p>
<p>Planning for Calne</p>	<p>It will be important to demonstrate how proposals have considered and responded to the historic environment, the town’s history, character and landscape setting. Calne doesn’t appear to have a Conservation Area Appraisal and Management Plan but more importantly perhaps is the absence of a setting assessment to inform considerable proposed edge of town expansion.</p>

	<p>CA1. What do you think to this scale of growth? Should there be a brownfield target? Should it be higher or lower?</p> <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) and the future form ensuring a good fit with the townscape. An accurate capacity can be informed by a Conservation Area Appraisal, currently absent.</p>
	<p>CA2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?</p> <p>A Conservation Area Appraisal and Management Plan and or 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).</p>
	<p>CA3. Is this the right pool of potential development sites? Are there any other sites we should be considering?</p> <p>The Council should consider whether a Conservation Appraisal and setting assessment is required to inform the promotion of suitable development sites within the town.</p> <p>Disclaimer – Historic England has not undertaken a detailed assessment of the suggested sites at Calne due to Wiltshire Council’s intention to provide further evidence. We therefore 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.</p>
	<p>CA4. What land do you think is the most appropriate upon which to build? What type and form of development should be brought forward at the town?</p> <p>An understanding of the history, character, identity, appearance and landscape setting should inform the level of growth and site suitability in accordance with national policy. Historic England’s published advice on site allocations may be useful. https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/</p> <p>An up to date Conservation Appraisal and setting assessment, where appropriate, can help inform the Plan.</p> <p>It would be helpful to appreciate the judgements of the Council’s in-house heritage and landscape expertise, and any germane planning history.</p>

	<p>It will be important to be mindful of legislation, national policy, guidance and advice for the historic environment.</p>
	<p>CA5. Are there important social, economic and environmental factors you think we've missed that need to be considered, generally or in respect of individual sites?</p> <p>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 for Calne is recommended including a strategic landscape setting assessment and up to date Conservation Area Appraisal to inform brownfield capacity and place shaping opportunities.</p> <p>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.</p>
<p>Planning for Corsham</p>	<p>It will be important to demonstrate how proposals have considered and responded to the historic environment, the town's history, character and landscape setting. It is unclear whether there are Conservation Area Appraisals and Management Plans available nor a setting assessment to inform considerable proposed edge of town expansion.</p>
	<p>CO1. What do you think to this scale of growth? Should there be a brownfield target? Should it be higher or lower?</p> <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) and the future form ensuring a good fit with the townscape. An accurate capacity can be informed by Conservation Area Appraisals, which appear to be absent.</p>
	<p>CO2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?</p> <p>Conservation Area Appraisals and Management Plans and or a Heritage Topic Paper for the town can help 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).</p> <p>Have the Corsham Conservation Statement and 2015 Public Realm Study informed priorities?</p>
	<p>CO3. Is this the right pool of potential development sites? Are there any other sites we should be considering?</p>

	<p>The Council should consider whether a Conservation Appraisal and setting assessment is required to inform the promotion of suitable development sites within and around the town.</p> <p>Disclaimer – Historic England has not undertaken a detailed assessment of the suggested sites at Corsham due to Wiltshire Council’s intention to provide further evidence. We therefore 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.</p>
	<p>CO4. What land do you think is the most appropriate upon which to build? What type and form of development should be brought forward at the town?</p> <p>An understanding of the history, character, identity, appearance and landscape setting should inform the level of growth and site suitability in accordance with national policy. Historic England’s published advice on site allocations may be useful. https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/</p> <p>Up to date Conservation Appraisals and setting assessment, where appropriate, can help inform the Plan.</p> <p>It would be helpful to appreciate the judgements of the Council’s in-house heritage and landscape expertise, and any germane planning history.</p> <p>It will be important to be mindful of legislation, national policy, guidance and advice for the historic environment.</p>
	<p>CO5. Are there important social, economic and environmental factors you think we’ve missed that need to be considered, generally or in respect of individual sites?</p> <p>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 for Corsham is recommended; and a strategic landscape setting assessment and up to date Conservation Area Appraisals to inform brownfield capacity and place shaping opportunities.</p> <p>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.</p>
<p>Planning for Chippenham</p>	<p>It will be important to demonstrate how proposals have considered and responded to the historic environment, the town’s history, character and, in particular, Chippenham’s landscape setting and surrounding heritage assets. A heritage topic paper and up to date setting assessment for the town and affected assets will be important, mindful of the scale and distribution of potential development.</p>
	<p>CP1. What do you think to this scale of growth? Should there be a brownfield target?</p>

	<p>Should it be higher or lower?</p> <p>The form and character of the town and surrounding villages, within its 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.</p> <p>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. An accurate capacity can be informed by up to date appraisals for the affected Conservation Areas. We note the Chippenham Conservation Appraisal and Management plan are somewhat dated and others may be absent e.g. Allington. The absence of such important evidence should be addressed.</p>
	<p>CP2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?</p> <p>Conservation Area Appraisals, Management Plans and a Heritage Topic Paper for the town 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).</p>
	<p>CP3. Do you agree these sites are the most appropriate upon which to build? If not, why not?</p> <p>We note that the Council has considered the impact of development on the historic environment, but it isn't clear how it has informed the spatial strategy and site selection. A heritage topic paper could usefully provide this narrative. It can also include the judgements of the Council's in-house heritage, archaeological and landscape expertise, and any germane planning history. We will defer a detailed evaluation of the suggested sites until such information is available.</p> <p>Needless to say, it will be important for any heritage topic paper to highlight how relevant legislation, national policy, guidance and advice for the historic environment has been applied.</p>
	<p>CP4. What are the most important aspects to consider if these sites are going to be built on?</p> <p>An understanding of the history, character, identity, appearance and landscape setting should inform development in accordance with national policy. Historic England's published advice on site allocations may be useful. https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/</p>
	<p>CP5. How can these concept plans be improved?</p> <p>At present it is unclear how an understanding of the significance of the historic</p>

	environment (heritage assessment) has informed the concept plans.
	<p>CP13. Is there anything we have missed that needs to be considered in planning for Chippenham?</p> <p>We hope the previous responses to Q CP1-5 will help to inform the further planning work to be undertaken.</p>
Planning for Devizes	It will be important to demonstrate how proposals have considered and responded to the historic environment, the town's history, character and, in particular, Devizes landscape setting and surrounding heritage assets. A heritage topic paper and up to date setting assessment for the town and affected assets will be important, mindful of the scale and distribution of potential development, and proximity to heritage assets.
	<p>DE1. What do you think to this scale of growth? Should there be a brownfield target? Should it be higher or lower?</p> <p>The form and character of the town, within its 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.</p> <p>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. An accurate capacity can be informed by an up to date Conservation Area appraisal. We note the towns conservation statement is now 15 years old.</p>
	<p>DE2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?</p> <p>A Conservation Area Appraisal, Management Plan and a Heritage Topic Paper for the town 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).</p>
	<p>DE3. Is this the right pool of potential development sites? Are there any other sites we should be considering?</p> <p>The Council should consider whether a Conservation Appraisal and setting assessment is required to inform the promotion of suitable development sites.</p> <p>Disclaimer – Historic England has not undertaken a detailed assessment of the suggested sites at Devizes due to Wiltshire Council's intention to provide further evidence. We therefore 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</p>

	enhancement.
	<p>DE4. What land do you think is the most appropriate upon which to build? What type and form of development should be brought forward at the town?</p> <p>An understanding of the history, character, identity, appearance and landscape setting should inform development in accordance with national policy. Historic England’s published advice on site allocations may be useful. https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/</p>
	<p>DE5. Are there important social, economic or environmental factors you think we’ve missed that need to be considered, generally or in respect of individual site?</p> <p>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 for Devizes is recommended; and a strategic landscape setting assessment and up to date Conservation Area Appraisals to inform brownfield capacity and place shaping opportunities.</p> <p>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.</p>
	<p>DE6. Are there any other issues or infrastructure requirements that should be identified?</p> <p>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.</p>
Planning for Malmesbury	<p>It will be important to demonstrate how proposals have considered and responded to the historic environment, the town’s history, character and landscape setting. Malmesbury doesn’t appear to have an up to date and the towns character assessment is now 13 years old. The Council should consider the preparation of a setting assessment to inform edge of town expansion and also whether an update of the 2010 Conservation Area Appraisal and Management Plan is required.</p>
	<p>MM1. What do you think to this scale of growth? Should there be a brownfield target? Should it be higher or lower?</p> <p>The form and character of the historic settlement, within its wider landscape setting, and the availability of suitability 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) and the future form ensuring a good fit with the townscape. An accurate capacity can be informed by an up to date</p>

	Conservation Area Appraisal.
	<p>MM2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?</p> <p>An up to date Conservation Area Appraisal and Management Plan and or 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).</p>
	<p>MM3. Is this the right pool of potential development sites? Are there any other sites we should be considering?</p> <p>The Council should consider whether an updated Conservation Appraisal and setting assessment is required to inform the promotion of suitable development sites within the town.</p> <p>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 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.</p>
	<p>MM4. What land do you think is the most appropriate upon which to build? What type and form of development should be brought forward at the town?</p> <p>An understanding of the history, character, identity, appearance and landscape setting should inform the level of growth and site suitability in accordance with national policy. Historic England’s published advice on site allocations may be useful. https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/</p> <p>An up to date Conservation Appraisal and setting assessment might help inform the Plan.</p> <p>It would also be helpful to appreciate the views on proposals of the Council’s in-house heritage and landscape expertise, and any germane planning history.</p>
	<p>MM5. Are there important social, economic or environmental factors you think we’ve missed that need to be considered, generally or in respect of individual site?</p> <p>It is evident the Council appreciate that further heritage evidence needs to be gathered and applied.</p>
	<p>MM6. Are there any other issues or infrastructure requirements that should be identified?</p> <p>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 toper could establish the issues, needs and opportunities</p>

	relating to the historic environment.
Planning for Marlborough	It will be important to demonstrate how proposals have considered and responded to the historic environment, the town's history, character and landscape setting. Marlborough doesn't appear to have a Conservation Area Appraisal and Management Plan and a setting assessment to inform edge of town expansion would be invaluable.
	<p>MB1. What do you think to this scale of growth? Should there be a brownfield target? Should it be higher or lower?</p> <p>The form and character of the historic settlement, 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) and the future form ensuring a good fit with the townscape. An accurate capacity can be informed by an up to date Conservation Area Appraisal.</p>
	<p>MB2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?</p> <p>A Conservation Area Appraisal and Management Plan and or 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).</p>
	<p>MB3. Is this the right pool of potential development sites? Are there any other sites we should be considering?</p> <p>The Council should consider whether a Conservation Appraisal and setting assessment is required to inform the promotion of suitable development sites within the town.</p> <p>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.</p>
	<p>MB4. What land do you think is the most appropriate upon which to build? What type and form of development should be brought forward at the town?</p> <p>An understanding of the history, character, identity, appearance and landscape setting of the city should inform the level of growth and site suitability in accordance with national policy. Historic England's published advice on site allocations may be useful. https://historicengland.org.uk/images-books/publications/historic-environment-and-</p>

	site-allocations-in-local-plans/
	<p>MB5. Are there important social, economic or environmental factors you think we've missed that need to be considered, generally or in respect of individual site?</p> <p>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 Appraisal to inform brownfield capacity and place shaping opportunities.</p> <p>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.</p>
	<p>MB6. Are there any other issues or infrastructure requirements that should be identified?</p> <p>We note that the historic environment/heritage assets is considered 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.</p>
Planning for Melksham	<p>It will be important to demonstrate how proposals have considered and responded to the historic environment, the town's history, character and landscape setting. Melksham doesn't appear to have a Conservation Area Appraisal and Management Plan but more importantly perhaps is the absence of a setting assessment to inform considerable proposed edge of town expansion.</p>
	<p>ME1. What do you think to this scale of growth? Should there be a brownfield target? Should it be higher or lower?</p> <p>The form and character of the historic settlement, 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) and the future form ensuring a good fit with the townscape. An accurate capacity can be informed by an up to date Conservation Area Appraisal.</p>
	<p>ME2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?</p> <p>A Conservation Area Appraisal and Management Plan and or 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).</p>
	ME3. Is this the right pool of potential development sites?

	<p>Are there any other sites we should be considering?</p> <p>The Council should consider whether a Conservation Appraisal and in particular a setting assessment is required to inform the promotion of suitable development sites within the town.</p> <p>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.</p>
	<p>ME4. What land do you think is the most appropriate upon which to build? What type and form of development should be brought forward at the town?</p> <p>An understanding of the history, character, identity, appearance and landscape setting of the city should inform the level of growth and site suitability in accordance with national policy. Historic England’s published advice on site allocations may be useful. https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/</p>
	<p>ME5. Are there important social, economic or environmental factors you think we’ve missed that need to be considered, generally or in respect of individual site?</p> <p>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 Appraisal to inform brownfield capacity and place shaping opportunities.</p> <p>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.</p>
	<p>ME6. Are there any other issues or infrastructure requirements that should be identified?</p> <p>We note that the historic environment/heritage assets is considered 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.</p>
<p>Planning for Royal Wootton Bassett</p>	<p>It will be important to demonstrate how proposals have considered and responded to the historic environment, the town’s history, character and landscape setting. Royal Wootton Bassett doesn’t appear to have a Conservation Area Appraisal and Management Plan but perhaps more importantly is the absence of a setting assessment to inform considerable proposed edge of town expansion.</p>
	<p>WB1. What do you think to this scale of growth? Should there be a brownfield target? Should it be higher or lower?</p>

	<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>
	<p>WB2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?</p> <p>Historic England welcome inclusion of the following priorities: protecting the distinct character and identity of the town; safeguarding the historic alignment of the Wilts and Berks Canal and taking forward canal restoration; conserving and enhancing environmental assets around Royal Wootton Bassett; maintaining the town’s elevated historical setting and central conservation area.</p> <p>Have these priorities been informed by a particular study of the town? A Conservation Area Appraisal and Management Plan and or Heritage Topic Paper could certainly demonstrate how the towns ‘priorities’ have been identified 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).</p>
	<p>WB3. Is this the right pool of potential development sites? Are there any other sites we should be considering?</p> <p>The Council should consider whether a setting assessment would help inform the promotion of suitable development sites.</p> <p>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.</p>
	<p>WB4. What land do you think is the most appropriate upon which to build? What type and form of development should be brought forward at the town?</p> <p>An understanding of the history, character, identity, appearance and landscape setting of the city should inform the level of growth and site suitability in accordance with national policy. Historic England’s published advice on site allocations may be useful. https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/</p>
	<p>WB5. Are there important social, economic or environmental factors you think</p>

	<p>we've missed that need to be considered, generally or in respect of individual site?</p> <p>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 Appraisal to inform brownfield capacity and place shaping opportunities.</p> <p>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.</p>
	<p>WB6. Are there any other issues or infrastructure requirements that should be identified?</p> <p>We note that the historic environment/heritage assets is considered 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.</p>
Planning for Salisbury	<p>It will be important to demonstrate how proposals have considered and responded to the historic environment, the town's history, character, below ground archaeology and, in particular, its landscape setting. The Council should consider whether an up to date setting assessment for the town is required.</p>
	<p>SB1. What do you think to this scale of growth? Should there be a brownfield target? Should it be higher or lower?</p> <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>
	<p>SB2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?</p> <p>We broadly welcome these priorities.</p> <p>The Conservation Area Appraisal and Management Plan and a Heritage Topic Paper can help to further inform potential additions 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).</p>
	<p>SB3. Is this the right pool of potential development sites? Are there any other sites we should be considering?</p> <p>The Council should consider whether a strategic and up to date setting assessment is</p>

required to inform the promotion of suitable development sites.

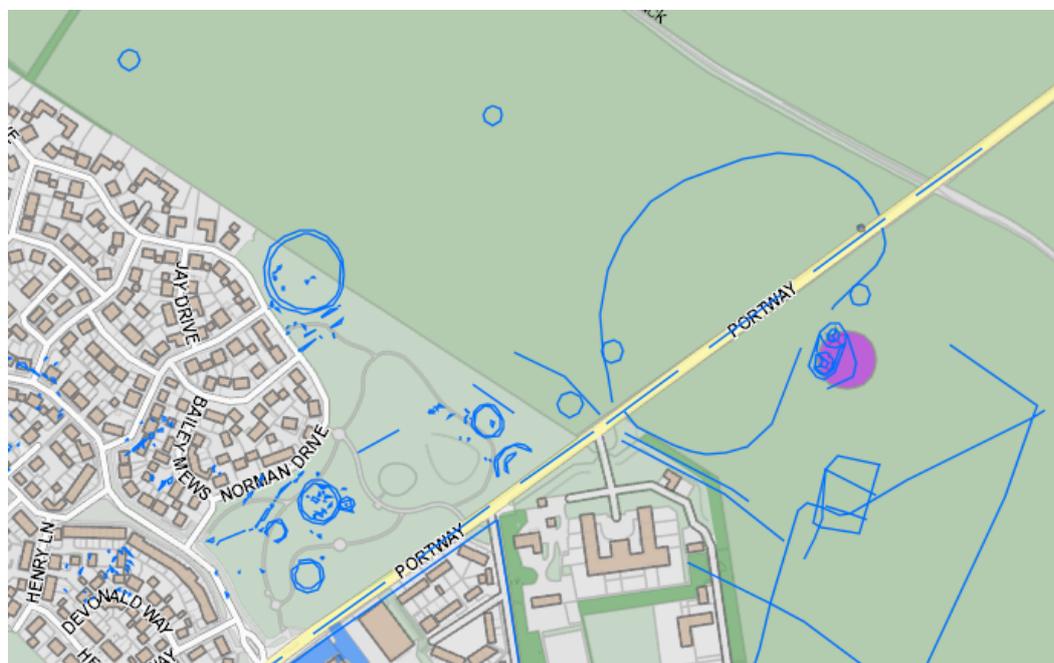
Site 1: Land NE of Old Sarum

“The site’s landscape character is prominent and exposed, with few hedgerows, and assessment shows that any development would have to accommodate this successfully whilst taking account of the setting for Ende Burgh scheduled long barrow to the east of The Portway”.

Without further expert assessment by the local authority as part of the plan making process and subsequent clear and appropriate response to the numerous heritage concerns, one must question how such development might successfully be accommodated in this sensitive and historic landscape setting.

Currently the view of the local authority’s in-house heritage and landscape expertise isn’t apparent. We assume the planning history and evidence base associated with previous planning applications and development plans also continue to be relevant and may help inform the principle of development today.

It isn’t clear how the indicative concept diagrams accompanying the consultation acknowledge or positively respond to the significance of numerous on and off-site heritage matters.



From our initial assessment we note that the barrow is not very well understood and could be Bronze Age or Roman, it could be one barrow or two. If Bronze Age, then it is likely to be part of a wider cemetery with other known barrows in the area (not scheduled as ploughed flat) including a large example on the north edge of the current development northwest of the Portway. Views to and from other Bronze Age monuments then becomes a factor of its significance.

If Roman, then it is likely to be associated with the Portway Roman Road and may be part of a cemetery along the road here. There is a single ditched oval enclosure next to it

	<p>which goes across the road. This may be Roman, and it may define a cemetery.</p> <p>The barrow is a significant landscape feature sitting on a high point in the landscape and is visible from a wide area. As a burial marker it was meant to be seen and to project power and control, the person buried here was important and they wanted to make sure everyone knew it.</p> <p>The undesignated barrows are the circles (single and double) forming a small cemetery. The public space next to Norman Drive preserves these.</p> <p>The view from Figsbury Ring may also be important, as is (certainly) the relationship of the site to the adjacent Monarchs Way, and Old Sarum heritage assets within their wider landscape setting.</p> <p>The nations heritage assets are an irreplaceable resource and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations. One must carefully consider whether further expansion of the current development off the Portway would accord with such national policy, legislation, guidance and advice to help protect such finite and nationally important heritage assets and their appreciation within context i.e. their setting.</p>
	<p>Site 6 & 7 Downton Road</p> <p>These sites to the south east of the city relate to several important heritage assets including the Woodbury scheduled monument and related undesignated and less known archaeology; Britford conservation area and associated listed buildings; the Salisbury conservation area, River Avon and meadows, and; the wider historic landscape setting including views of the Cathedral - all important matters to inform the relative suitability of these sites.</p> <p>It would be helpful to appreciate the thoughts of the council's in-house heritage and landscape expertise on how such matters have informed these proposals, and any previous planning history that may still be relevant.</p> <p>It will be important to demonstrate how legislation, national policy, guidance and advice for the historic environment has been applied, and in particular how the Britford conservation area appraisal and management plan has been considered especially in relation to site 6.</p> <p>Certainly, further expert assessment appears to be required as part of the plan making process to better understand the extensive and important below ground archaeology, and to better explain a contextual and positive response to the historic environment that would be required, should the principle be deemed appropriate.</p>
	<p>SB4. What land do you think is the most appropriate upon which to build? What type and form of development should be brought forward at the town?</p> <p>An understanding of the history, character, identity, appearance and landscape setting of the city should inform the level of growth and site suitability in accordance with national policy. Historic England's published advice on site allocations may be useful.</p>

	https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/
	<p>SB5. Are there important social, economic and environmental factors you think we've missed that need to be considered, generally or in respect of individual sites?</p> <p>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 recommended including a strategic landscape setting assessment and up to date Conservation Area Appraisal to inform brownfield capacity and place shaping opportunities.</p> <p>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.</p>
Planning for Tidworth and Ludgershall	It will be important to demonstrate how proposals have considered and responded to the historic environment, in particular below ground archaeology, landscape setting and surrounding heritage assets. A heritage topic paper and up to date setting assessment will be important, mindful of the scale and distribution of potential development.
	<p>TL1. What do you think to this scale of growth? Should there be a brownfield target?</p> <p>Historic England considers that the character of these historic settlements, within their wider landscape setting, and the availability of suitability sites should inform the proposed scale and form 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 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).</p>
	<p>TL4. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?</p> <p>A heritage topic paper might identify certain heritage matters requiring priority attention.</p>
	<p>TL5. Is this the right pool of potential development sites? Are there any other sites we should be considering?</p> <p>The Council should consider whether a setting assessment is required to inform the promotion of suitable development sites.</p> <p>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.</p>
	TL7. Are there important social, economic or environmental factors you think

	<p>we've missed that need to be considered, generally or in respect of individual site?</p> <p>A heritage topic paper might identify certain heritage matters requiring attention.</p>
	<p>TL8. Are there any other issues or infrastructure requirements that should be identified?</p> <p>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.</p>
Planning for Trowbridge	<p>It will be important to demonstrate, perhaps in a discrete heritage topic paper, how proposals have considered and responded to the historic environment, the town's history, character and, in particular, it's landscape setting and surrounding heritage assets such as Hilperton Conservation Area. It appears a setting assessment for the town and affected assets has been undertaken. This will be useful evidence to consider, and we assume will be publicly available in due course.</p>
	<p>TB1. What do you think to this scale of growth? Should there be a brownfield target? Should they be higher or lower?</p> <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>
	<p>TB2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?</p> <p>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.</p>
	<p>TB3. Do you agree these sites are the most appropriate upon which to build? If not, why not?</p> <p>We assume that an understanding of the history, character, identity, appearance and landscape setting of the town has informed the level of growth and site suitability in accordance with national policy. We hope Historic England's published advice on site allocations may have been useful.</p> <p>https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/</p>
Planning for	<p>It will be important to demonstrate, perhaps in a discrete heritage topic paper, how</p>

<p>Warminster</p>	<p>proposals will have considered and responded to the historic environment, the town's history, character and, in particular, its landscape setting and surrounding heritage assets. Warminster and Bishopstrow do not appear to have a 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.</p>
	<p>WA1. What do you think to this scale of growth? Should there be a brownfield target? Should it be higher or lower?</p> <p>Historic England considers that the historic form and character of a historic settlement within its wider landscape setting, <u>and</u> the availability of suitable sites should inform the proposed scale of growth.</p> <p>We support Wiltshire Council's efforts to identify, allocate and prioritise all potential brownfield opportunities, big and small, including repurposing existing vacant or underused buildings of historic or architectural interest to help reinforce the character of the town and in turn limit sprawl. An ambitious target is encouraged although the related future capacity (amount of development) must relate to the context of the site(s) and the future form should ensure a good fit with the townscape.</p> <p>Historic England has prepared advice on optimising housing density within historic places which may be helpful. https://historicengland.org.uk/images-books/publications/increasing-residential-density-in-historic-environments/</p>
	<p>WA2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?</p> <p>Conservation Area Appraisal's and Management Plan's for the town and Bishopstrow, and 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).</p>
	<p>WA3. Is this the right pool of potential development sites? Are there any other sites we should be considering?</p> <p>Conservation Appraisal's and a strategic setting assessment will be important evidence to inform a site's suitability.</p> <p>Disclaimer – Historic England have not undertaken a detailed assessment of the suggested sites in and around the town due to the additional evidence proposed to be gathered. We therefore respectfully reserve judgement on their suitability.</p>
	<p>WA4. What land do you think is the most appropriate upon which to build? What type and form of development should be brought forward at the town?</p> <p>Wiltshire council acknowledge that further assessment and consideration of the historic environment is essential to determine whether or not the principle of certain sites is acceptable and if so the form they may take. At present without such evidence in the public domain, Historic England is unable to take a view on whether the Local Plan has been prepared in accordance with legislation, national policy, guidance and advice for</p>

	<p>the historic environment. Our judgement on such matters will consequently need to be deferred.</p> <p>Wiltshire Council explored several potential sites during the preparation of the recent Wiltshire Housing Allocations Plan's (2020). No doubt this experience can inform the current plan making process.</p> <p>Historic England's position on Site 2 East of Deane is illustrated by our previous statement provided for the Planning Inspectorate's Examination of the aforementioned Housing Allocations Plan. https://www.wiltshire.gov.uk/article/2353/Wiltshire-Housing-Sites-DPD-Examination</p> <p>This current consultation suggests a much larger site that may well exaggerate the impact and degree of harm.</p>
	<p>WA5. Are there important social, economic or environmental factors you think we've missed that need to be considered, generally or in respect of individual site?</p> <p>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.</p> <p>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.</p>
	<p>WA6. Are there any other issues or infrastructure requirements that should be identified?</p> <p>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.</p>
<p>Planning for Westbury</p>	<p>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.</p>
	<p>WE1. What do you think to this scale of growth? Should there be a brownfield target? Should it be higher or lower?</p> <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</p>

	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?</p> <p>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.</p>
	<p>WE3. Is this the right pool of potential development sites? Are there any other sites we should be considering?</p> <p>The Council should consider whether a setting assessment could help inform the promotion of suitable alternative development sites.</p> <p>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.</p>
	<p>WE4. What land do you think is the most appropriate upon which to build? What type and form of development should be brought forward at the town?</p> <p>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.</p>
	<p>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 site?</p> <p>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.</p> <p>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.</p>
	<p>WE6. Are there any other issues or infrastructure requirements that should be identified?</p> <p>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.</p>

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T&L17a

Our Ref: 190823

4 March 2021

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



By email to: spatialplanningpolicy@wiltshire.gov.uk

Wiltshire Council Local Plan Review Consultation (January 2021)

Fowler Architecture & Planning Ltd is instructed by **Foreman Homes Limited** (FHL) in respect of providing representations to the consultation on the Wiltshire Local Plan Review (LPR) and its supporting evidence.

Our client's interest relates to 'Land at Empress Way, Ludgershall' comprising the site promoted in the original November 2017 Issues Paper Consultation on behalf of [REDACTED]. FHL have acquired control of the land subject of the Wiltshire Housing Sites Allocation Plan Policy H1.1 allocation with the first phase for 80 dwellings under construction. FHL have an interest in the wider landholding to deliver the mixed-use development to the south of Ludgershall within both Wiltshire Council and Test Valley Borough Council.

Our client welcomes the opportunity to share views on the issues and opportunities associated with LPR which will help to shape future growth in the area over the plan-period 2016 to 2036. Please find enclosed:

- Completed consultation forms; and
- Representations ordered by questions within the LPR Consultation with references to the appropriate paragraphs, topic papers and supporting evidence.

Please can the Representor be notified of future consultations relating to the LPR.

Yours faithfully,

[REDACTED]

FOWLER ARCHITECTURE AND PLANNING

Encs Land at Empress Way, Ludgershall Vision Document (December 2017)

cc: Clients

[REDACTED]
[REDACTED]
[REDACTED]

¹ Ludgershall South Park Garden Village Vision Document Version 1.1 (December 2017) by Fowlers

Document – Emerging Spatial Strategy

Main Settlements

1. FHL support the continued identification of Ludgershall as a ‘Main Settlement’ in the second tier as a ‘Market Town’. The continued close physical and functional link between Tidworth and Ludgershall is also supported.
2. The Emerging Spatial Strategy (ESS) does not alter the description of the scale of growth for the main settlements from that within Core Policy 1.

Delivery Principles

3. Delivery Principle 2 proposes a target number of new homes that will need to be planned for within its urban area. Delivery Principle 5 may result in the phasing of large greenfield sites to ensure a priority is maintained on brownfield land. These ESS ‘Delivery Principles’ focus on maximising the use of previously developed land (PDL).
4. PDL is a rare resource in Wiltshire and while it is agreed that this should be reused (as emphasised by the NPPF), it must be recognised within the LPR that greenfield land is inevitable to accommodate the majority of growth.
5. The various Site Selection Reports (as supported by the SHELAA) demonstrates of lack of availability of PDL. The Council’s Brownfield Register Part 1 (2019) identifies a source of 2,274 dwellings on sites with no planning permission. This includes 1,100 dwellings at Churchfields which is under mixed ownership and not developable.
6. Given the continued need for greenfield development to ensure a supply of deliverable land, there do not exist any reasons for phasing restrictions on any greenfield sites.

Salisbury Housing Market Area

7. FHL wish to reiterate their representations to the Alternative Development Strategies (ADS) consultation concerning the local housing need for the Salisbury HMA.
8. The PPG² confirms that the government is committed to ensuring that more homes are built and supports ambitious authorities who want to plan for growth. The standard method for assessing local housing need provides a minimum starting point in determining the number of homes needed in an area.
9. The Local Housing Need Assessment (LHNA) identifies a LHN for the HMA of between 10,472 dwellings (using a 10-year migration trend) and 12,229 dwellings (using a 5-year migration trend). When future jobs and workers are aligned, the LHNA identifies a range of between 10,976 and 12,501 dwellings for the HMA. The LPR takes forward a minimum of 10,975 additional dwellings, which is based on the 10-year migration trend with an alignment for jobs and workers.
10. The use of a 10-year period for migration trends for disaggregating the LHN of 40,840 (prior to any uplift) to the HMAs is not justified. Paragraphs 3.29 to 3.32 of the LHNA explain the reasons, however this is in the context of former advice. The PPG no longer

² Reference ID: 2a-010-20201216

requires HMAs to be defined. It is therefore justified to disaggregate according to the higher-level methodology as a starting point.

11. The Council has sought to choose the lower end of the overall range (with uplift), which is substantially lower than the 12,229 dwellings, uplifted to 12,500 dwellings, required when using a 5-year migration trend.
12. The LHNA is clear at paragraph 4.2 the benefits of using a figure at the higher end of the ranges:

'...therefore, preparing each Plan based on a number that is higher than the current LHN will help to ensure that fluctuations in the LHN in future years are more likely to be accommodated without changes being needed, given that the housing requirement is only fixed for 2 years from the point at which plans are submitted.

13. FHL would also highlight the PPG recognises there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicates.
14. The LHNA correctly acknowledges the need for an uplift to the HMA to better align jobs and workers. Paragraph 4.20 states the recommended uplift above the LHN meets the needs of additional workers needed to fulfil the forecast jobs growth without any changes in commuting patterns. Figure 13 of the LHNA confirms a relatively high percentage (relatively to other HMAs) of main jobs fulfilled by commuters into the Salisbury HMA. There is a missed opportunity of the LPR to boost housing need to a higher level, including higher than the uplift suggested, because the preferred strategy will not result in any reduction in existing high inward commuting levels.
15. There are other factors which the Council must consider in determining whether actual housing need is higher. FHL would point to the opportunity to establish a growth strategy at Ludgershall. The development of the Land at Empress Way, Ludgershall provides strategic infrastructure improvements that are themselves likely to drive an increase in the homes needed locally, contribute to a re-balanced civilian and MoD community, and act as a catalyst to unlock employment land. These considerations are outlined in the representations below considering the Planning for Tidworth and Ludgershall document.

Alternative Delivery Strategies and Sustainability Appraisal

16. The Wiltshire Local Plan Review: Interim Sustainability Appraisal Report (SAR) at Section 4.3 refers to the Salisbury HMA. The SAR supports the 'Formulating Alternative Development Strategies Wiltshire Council Salisbury' topic paper.
17. The SAR does not advise against the principle of a higher growth strategy and this is supported.
18. While both tested delivery strategies identify Strategy SA-B (Focus on Salisbury) as the most sustainable, this is not deliverable in the context of likely significant environmental effects. The emerging strategy is based around continuing the existing one (SA-A). Overall, assessed housing needs are slightly less than the current strategy and the emerging strategy has the same order of growth for Salisbury. It is not yet clear how

growth will be delivered at Salisbury in the context of whether or not the Churchfields allocation is rolled forwards.

19. The response to Question TL1 of the Planning for Tidworth and Ludgershall Document outlines the reasons why the emerging strategy is not positively prepared and an appropriate strategy taking into account the reasonable alternatives due to the lower level of growth proposed for the Market Town.

Document – Planning for Tidworth and Ludgershall

TL1. What do you think to this scale of growth? Should there be a brownfield target? Should it be higher or lower?

20. The Wiltshire Core Strategy, identified a requirement for 1,750 homes in the period 2006-2026. The LPR proposes a requirement of 1,555 homes for the plan period 2016-2036. The Planning for Tidworth and Ludgershall document continues to define a residual of 165 dwellings to be accommodated up to 2036 taking into account completions and commitments. The reasons for the scale of growth are explained within the document titled 'Formulating Alternative Development Strategies (ADSs) Wiltshire Council Salisbury' (FADS).
21. The FADS correctly identifies at Table 5 that the Market Town presents low levels of environmental risk, compared to the other main settlements. Also, at Table 6 it correctly identifies that Tidworth/Ludgershall performs significantly stronger than Amesbury in that it is most supported by existing transport infrastructure suggesting these locations over others as a location for growth. Table 10 of the FDAS summarises that lower growth should be proposed because:

'Economic forecasts as well as population and housing needs assessments suggest a substantially smaller share of HMA growth. Housing delivery has not been strong despite a significant supply of land. It would be appropriate to test a lower rate of growth, although, as elsewhere, scope to do so may be restricted by the current level of housing commitments.'

22. Paragraph 51 to 70 of the FDAS summarises that Tidworth and Ludgershall indicate fewer homes than the Core Strategy because '*past house building rates have not met those planned*'. The FADS has not recognised that the slower rate of housing is a direct consequence of the inability of the Core Strategy to have delivered the required growth.
23. The larger developments delivered in recent years at Tidworth/Ludgershall are legacy housing allocations from the Kennet Local Plan adopted in April 2004, i.e. North East Quadrant and Granby Garden Centre. These were envisaged to have met the needs to 2011, however both only commenced post-2011 and are only now nearing completion, being delivered quickly once commenced.
24. Any criticism of housing delivery not being strong despite a significant supply of land needs to look at the decision of the Core Strategy to allocate a Strategically Important Allocation at Drummond Park MSA Depot for 475 homes, which ignored warnings at the time concerning its deliverability. While a planning permission now exists for the Drummond Park allocation, it has taken Homes England to acquire the site in early 2017

to give some faint prospect that it is now developable. The assessment of potential scales of growth should therefore not chose to abandon the benefits of economic diversification simply because of the pace of delivery to date, which has been shaped by a very unique set of circumstances, including the choosing of the wrong site to allocate at Drummond Park.

25. While a lower indicator for growth has been identified for Tidworth and Ludgershall based on implied future rates of development compared to actual past rates, higher housing growth remains an appropriate and justified catalyst to address the fundamental issues and objectives of the Market Town.
26. Paragraphs 71 to 82 of the FADS relate to economic aspects, which again have led to a conclusion of less housing growth to Tidworth and Ludgershall. Paragraph 78 refers to *'Scenarios for Tidworth and Ludgershall show a large mismatch. The comparison suggests that rates of housing growth should be reduced to counter balance potential net out-commuting.'*
27. A key challenge for the Tidworth Community Area in the Core Strategy was stated at paragraph 5.141, whereby *'Growth will have reflected the need to create a more balanced community and act as a catalyst to attract inward investment with new employment opportunities complementing those provided by the MoD.'* The LHNA assumes no change in commuting patterns relative to the 2011 census and this serves only to deny the creation of the balanced community.
28. The 2017 SHMA recognises that five functional HMAs exist in Swindon and Wiltshire, however established commuting and migration patterns do not accord with the 'best fit' approach. As an example, in relation to the Andover HMA this includes 19.1% of its population (16,200 persons) within Wiltshire, focused around Ludgershall. If the proposal to identify the Wiltshire element of the Andover HMA within the 'best fit' Salisbury HMA is to be accepted, there remains a particular issue in relation to out-commuting from the Salisbury HMA as it is known that established commuting and migration patterns are ultimately towards Andover and Hampshire from this community area.
29. There is clearly tension between preserving commuting patterns and achieving the objectives of the Core Strategy. To unduly restrict any net out-commuting associated with development at Ludgershall would ignore its functional relationship, particularly if opportunities existed to deliver infrastructure that enhances and widens travel choice within the HMA. The LPR must equally recognise opportunities to better support those existing and established movement patterns in a sustainable manner, while delivering the housing growth needed as a stimulus to bring forward a range of appropriate employment opportunities – including the Castledown Business Park.
30. Paragraphs 83 to 90 of the FADS relate to social aspects. The level of population distribution at Tidworth and Ludgershall is closely aligned to the current strategy. This alignment is because of the level of growth identified for the Market Town, thereby demonstrating benefits in maintaining, or exceeding the current level of growth. The impact of declining growth at the Market Town would be to lose the benefits associated with rebalancing the local population and reliance on the MoD. The social aspects do not consider housing growth relating to those service personnel and their families leaving the

MoD. Many former personnel remain settled at the Market Town and this is an important factor to plan to meet this newly arising need.

31. Having reviewed the Interim Sustainability Appraisal at Appendix I Annex I 'Salisbury HMA – Assessment of Emerging Preferred Strategy' it is also clear that the reduction of growth at Tidworth / Ludgershall does not achieve the following sustainability outcomes:
- SA Objective 8 seeks to provide everyone with the opportunity to live in good quality, affordable housing, and ensure an appropriate mix of dwelling sizes, types and tenures. The Preferred Strategy results in a residual requirement for 166 dwellings at the Market Town that would mean the rate of house building will notably drop for the latter part of the plan period. The SA concludes the likely effects will be 'neutral'. Neutral effects in relation to this objective must be avoided to ensure consistency with the national imperative to boost significantly the supply of homes.
 - SA Objective 9 seeks to reduce poverty and deprivation and promote more inclusive communities with better services and facilities. In relation to the Market Town it is unclear how the effects are 'minor positive' given the fact that the 3 hectares of employment land will arise through the recycling of land at Castledown Business Park already allocated for that purpose. Furthermore, the objective is unlikely to be achieved given the reduction in planned growth at the settlement, as highlighted in the Core Strategy that makes clear that housing growth is the catalyst for expanding and diversifying the local economy.
 - SA Objective 10 seeks to reduce the need to travel and promote more sustainable transport choices. In relation to Tidworth / Ludgershall minor adverse impacts are identified. Adverse impacts will only be identified through constraining the level of growth for the Market Town as this would not provide the opportunity to create additional sustainable transport infrastructure including safe active travel. There are clear local priorities to address the impact of through-traffic using the Memorial Junction and Andover Road, that would be resolved by extending Empress Way eastwards to the A342. Such investment in infrastructure can only be delivered by delivering higher levels of growth for the Market Town through the allocation of wider land at Empress Way.
 - SA Objective 11 seeks to encourage a vibrant and diversified economy and provide for long-term sustainable economic growth. The moderate positive impacts are unlikely to be achieved given the lack of growth, see response to SA Objective 9.
32. Overall, the above demonstrates that the restrictions on growth at Tidworth and Ludgershall (as well as the wider HMA outlined in the Emerging Spatial Strategy Representations) fail to properly grasp the available opportunities to deliver sustainable development.
33. The need and local aspiration for higher levels of growth at the Market Town have consistently been made in the LPR consultations to date which disagreed with a reduction in proposed housing numbers. An increase in housing numbers was desired in order to

maintain economic growth and increase supply to lower housing prices (FADS Table 7). The Town and Parish Council workshops also identified that it was believed that land might exist for 500-600 new homes across the two towns (FADS paragraph 43). Higher growth was suggested around Tidworth and Ludgershall so there was scope for the area to meet unmet needs from the Andover Housing Market Area (FADS paragraph 46) – however FADS Table 4 assumes there that the HMA will not accommodate any unmet needs from neighbouring areas which will need to be subject of the Duty to Cooperate with Test Valley Borough Council.

34. In conclusion, the preferred development strategy and reduced growth at Tidworth and Ludgershall is incorrectly predicated on various factors, including the perceived slow rate of delivery in the past. In fact, the progress on deliverable sites has been strong and there is clear market demand for homes at the Market Town. While the Market Town has seen strong growth before, this was required in the context of rebalancing the civilian and military population; which itself continues to grow with personnel also opting to retire and remain in the area. A higher level of growth for the HMA and this Market Town remains the justified and appropriate strategy. The proposed requirement for 1,555 new homes in the period to 2036, of which there is a residual of 165, is not justified and consistent with achieving sustainable development.
35. In terms of a brownfield target, the Planning for Tidworth and Ludgershall consultation papers do not identify any previously developed land within the Site Selection Report as a candidate for growth. All sites are greenfield land. Consequently, there is insufficient available and deliverable PDL at the Market Town to meet future housing needs.

TL2. Do you agree that the strategy should look to allocate more employment land?

36. Given permanent changes to working patterns, there does not appear to be any overriding need to allocate more employment land whilst the existing Castledown Business Park remains available for development, with approximately 10 hectares of undeveloped land consented for business uses.

TL3. How could the delivery of employment on the Castledown Business Park be facilitated?

37. Paragraph 5.141 of the Core Strategy recognises that ‘Growth will have reflected the need to create a more balanced community and act as a catalyst to attract inward investment with new employment opportunities complementing those provided by the MoD.’ It remains true that growth that is coupled with the re-balancing of the housing stock and reliance on the MoD remains the most appropriate strategy to facilitate the delivery of employment land.
38. In the above context, the recent Housing Land Supply Statement identifies that growth will not meet the requirement for 1,750 homes in the period to 2026. With a degree of suppressed growth, hindered largely by the absence of delivery at Drummond Park, it is no surprise that inward investment has not materialised as was hoped. There must be an upscaling of growth at the market town to better realise the potential. This will in turn provide the impetus to deliver employment on the Castledown Business Park, in combination with other initiatives taken forward by the community, Wiltshire Council and the Local Economic Partnership.

TL4. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?

39. The priority (i) to plan for a level of housing growth to meet 'local needs', does not correctly recognise the defined capability of the Market Town (see Core Strategy and the Emerging Spatial Strategy) to deliver '*significant development*' that will increase the jobs and homes in each town in order to help sustain and where necessary enhance their services and facilities and promote better levels of self-containment and viable sustainable communities. Local needs will be met in tandem with the Market Town performing a greater strategic role in meeting the wider needs for growth.
40. Priority (iv) references support for the continuation of Empress Way to the south-east of the town. This is welcomed and is an established place shaping principle of the 'Land at Empress Way Vision Document' of December 2017, which includes a proposal to reserve and deliver a connector road via an overbridge of the railway line to link to the A342. It would be helpful if priority (i) could be amended to explicitly reflect the intention to continue Empress Way (which is being constructed to distributor road standard) to the A342. A key benefit of this connection is a reduction of traffic movements at the Andover Road / High Street 'Memorial Junction' as part of a potential downgrading of the A342 between Ludgershall and the A346 junction with traffic diverted via Windmill Drive at Tidworth.
41. Priority (vi) references support for exploring long-term opportunities to open the MOD railhead as a commercial line. This is welcomed and is an established place shaping principle of the 'Land at Empress Way Vision Document' of December 2017, which includes a proposal to reserve land for a railway station on the southern side of the line.
42. The above place shaping priorities can only be achieved through the development of 'Site 4' Land at Empress Way.

TL5. Is this the right pool of potential development sites? Are there any other sites we should be considering?

43. Our client supports the inclusion of 'Site 4' Land at Empress Way (SHELAA site 555) within your pool of sites.
44. The extents of the strategic development opportunity defined within the 'Land at Empress Way Vision Document' of December 2017 extend outside of the areas identified in Site 4. This includes: areas of green infrastructure to the south, land adjoining Shoddenden Lane under the control of Wiltshire Council; and land required to the east to facilitate a highways connection to the A342. The extents of Site 4 should be amended to be consistent with the Vision and wider developable area.

TL6. What land do you think is the most appropriate upon which to build? What type and form of development should be brought forward at the town?

45. Site 4 'Land at Empress Way' is the most appropriate upon which to build to meet strategic and local growth.
46. FHL wish to reiterate their commitment to working with Wiltshire Council to deliver the proposed development of 'Land at Empress Way' as well as facilitating the associated and

necessary transport infrastructure. FHL is committed to make substantial investments in transport infrastructure as part of the development to ensure the successful future extension of Empress Way eastwards to connect to the A342.

47. The 'Land at Empress Way Vision Document' of December 2017 defines the type and form of development deliverable at the site. The site can deliver large scale growth to the south-east of Ludgershall. The proposed development will result in the construction of approximately 1,500 new homes, land for a C2 care facility, the creation of a new local centre, provision of new educational facilities (1 primary school and 1 pre-school), land reserved for a railway station and car park, a new healthcare facility, and land for the relocation of the Ludgershall Fire Station. The proposed development will also provide substantial public open space provision, allotments, a new community sport hub, accessible natural greenspace and habitat enhancements of current arable farmland.
48. FHL currently propose a 10 year, three phase, build period for the development with an expectation that work would commence on site in Q1 2025, and be completed by 2036. This programme anticipates that within 4 years of today's date, work will have commenced on site to deliver this important strategic allocation. In addition to the homes proposed, FHL are committed to providing significant social infrastructure for the expanded community.
49. The social and economic infrastructure provided on site, will be complemented by the onsite and offsite transport and highways infrastructure works that have been previously discussed with Wiltshire Council, Test Valley Borough Council, Hampshire County Council, Ludgershall Town Council and Network Rail. For clarity, FHL confirm their commitment to the delivery of the eastward extension of Empress Way to connect to the A342 and other transport infrastructure works. The transport strategy for Land at Empress Way has been formed using the following approach:
 - Reduce the need to travel through the provision of high quality local facilities;
 - Promote and enhance travel by sustainable mode;
 - Provide the infrastructure to meet the needs of the existing communities and accommodate growth in a co-ordinated and strategic fashion.
50. The development has been designed to encourage sustainable modes of travel including high quality walking and cycling links to provide integration with the existing town and employment opportunities, as well as extending the cycleway to Weyhill and Andover via the A342.
51. Extending Empress Way to connect to the A342 offers an increased public transport service to the south of the railway link which will link the site with larger hubs such as Salisbury and Andover. Ludgershall is within the functional Andover HMA and development at Empress Way provides a unique opportunity to complete the missing connector road, which will allow a vastly improved route to the A342. This provides an unrivalled opportunity to link Tidworth and Ludgershall with Andover, while encouraging greater accessibility of the Market Town to facilitate the uptake of the Castledown Business Park, unlocking economic growth potential. This connectivity will support the

growth of the community area and will form a strong public transport corridor, with potential to support inter-urban cycling.

52. As highlighted, FHL will directly deliver the extension of Empress Way to the distributor road standard, connecting to the A342 via an overbridge of the railway line, at an estimated cost of around £7 million to £10 million. This new southern connector road for Ludgershall will substantially reduce traffic through the town on Andover Road and reduce pressure at the Memorial Junction. This highways infrastructure can only be delivered and the benefits realised with a commitment for higher levels of growth at the Market Town and the allocation of Site 4 at a viable scale of development.
53. FHL wishes to work collaboratively with Wiltshire Council and other key stakeholders to ensure the allocation of Site 4 is proposed in the LPR, and is delivered with the maximum possible benefit to the local and wider area. FHL would welcome the opportunity to meet with Wiltshire Council once again to discuss the content of these representations.
54. A copy of the Vision Statement of December 2017 is resubmitted as part of these representations to outline FHL's intentions regarding Site 4.

TL7. Are there important social, economic or environmental factors you think we've missed that need to be considered, generally or in respect of individual site?

55. Having regard to the Site Selection Report for Tidworth and Ludgershall (SSR) the following site factors are raised for further consideration by the Council.
56. Site 1 'Land East of Crawlboys Road' has been correctly identified by the SSR as harmful to the setting of the AONB. The need to avoid impacting the setting of AONBs is to be recognised at paragraph 175 of the Draft NPPF for Consultation. Site 1 performs a useful function in separating the urban area from the distinctive nationally recognised landscape to the north of Ludgershall.
57. Site 2 'Land North of A342' has 'medium' heritage impacts that are likely to be understated by the SSR given the proximity to the Scheduled Monument. The landscape impacts identified by the SSR should also take into account the function of the site as part of the wider setting of the AONB.
58. Site 3 'Land North-east of A342' has 'medium' heritage impacts that are likely to be understated by the SSR given the proximity to the Scheduled Monument. The landscape impacts identified by the SSR should also take into account the function of the site as part of the wider setting of the AONB.
59. Site 4 'Land at Empress Way' has been classified as medium accessibility in the SSR. This is incorrect as the site benefits from 'high accessibility' as recognised by Policy H1.1. Such a change would bring the site in consistency with the SSR assumptions on Sites 1 and 5 which have similar distances and connectivity. Site 5 adjoins a market town which benefits from a good range of services, facilities and employment opportunities. The site is in an edge of town location, where residents could reasonably make sustainable transport choices other than the private car to reach services and facilities in the town centre. Andover Road, Ludgershall is served by bus stops which form part of the Salisbury – Amesbury – Tidworth – Andover 'activ8' service. The service is frequent and regular. Pedestrian access to Andover Road is via the railway crossing from Empress Way.

Development in this location provides for reasonably good access to a range of services and facilities, including the reserve site for the primary school at the H1.1 allocation.

60. The SSR identifies 'high' landscape impact for Site 4. The site is not located in a local or national landscape designation, or within the setting of the AONB being separated by the settlement to the north. Site 4 has the landscape capacity to accommodate change and this was recognised at page 36 of the Wiltshire Council 'Strategic Site Options Landscape Assessment: Appraisal of Strategic Site Options' (Capacity to accommodate landscape and visual change Autumn 2011).
61. While it is accepted that the site has limited established natural boundaries that help to enclose the site, the H1.1 allocation recognises mitigation is deliverable on the land in the form of the site design being led by a strong landscape framework. The Vision Document acknowledges this mitigation is deliverable and proposes significant additional screening at the southern and eastern site boundaries would be required, along with landscaping and green infrastructure throughout the site. The Vision Document identifies extensive land to the south and along Shoddesden Lane for this landscape framework and green infrastructure, thereby ensuring no coalescence with Great Shoddesden. Given the nature of the mitigation, it cannot be agreed that the development of Site 4 has a 'high' landscape impact. Our client can provide additional landscape evidence, including an LVIA, to identify the landscape mitigation required to accommodate the development.
62. Reference is made in the Planning for Tidworth and Ludgershall document to '*high potential for odour impacts*'. Odour considerations was relevant to Policy H1.1 that found no issues in this regard, evidenced by the Odour Assessment (updated as part of planning application 20/06554/FUL). The sniff test results extended outside of the H1.1 allocation, including locations 3, 4, 5 and 6 between H1.1 and the WWTW. Table 14 of the Odour Assessment identified negligible odour exposure from these locations, which are within Site 4. Our client can provide additional odour evidence in due course to support the promotion of Site 4 for allocation.
63. Site 5 'South-west Ludgershall' comprises three SHELAA Sites (2064, 2065 and 2066). While the site forms part of the SHELAA it is unclear as to whether it is truly available for development given it is currently under MoD ownership. The development of Site brings built form considerably closer to Tidworth and Perham Down, therefore the landscape impact of coalescence must be recognised as an adverse impact to be assessed.
64. Site 6 'Land North of Wellington Academy' is recognised by the SSR as comprising playing pitches for the school. Given the long-term growth needs for the market town, existing playing fields and green infrastructure should be protected. The SSR does not recognise the landscape impacts arising from poor connectivity of the site to the established settlement pattern and that it is not contiguous with the built-up area of the Drummond Park allocation. The introduction of sensitive residential uses in proximity to the Castledown Business Park may also not be desirable on compatibility grounds and frustrate attempts to bring forward the employment allocation.
65. Site 7 'Land North of A3026' brings built form considerably closer to Tidworth and Perham Down, therefore the landscape impact of coalescence must be recognised as an adverse impact to be assessed. The SSR does not recognise the landscape impacts arising

from poor connectivity of the site to the established settlement pattern and that it is not contiguous with the built-up area of the Drummond Park allocation.

66. Site 8 'Land West of Pennings Road' has been identified with 'medium' landscape impacts, however in reality the sloping nature of the site with expansive views from the north means such impacts are not capable of mitigation with planting in the foreground. The site reads as a distinct component of the wider Salisbury Plains given the block of woodland to the south.
67. Site 9 'North west Tidworth' has been identified with 'low' landscape impacts which makes it difficult to understand the downplaying of impacts given the similar outlying position as per Site 8.
68. Site 10 'Land South of Bulford Road', no further comments from those within the SSR.
69. Site 11 'Land South of The Mall', no further comments from those within the SSR.

TL8. Are there any other issues or infrastructure requirements that should be identified?

70. FHL wishes to reiterate that they welcome the opportunity to work collaboratively with Wiltshire Council and other key stakeholders to ensure the allocation of Site 4 is proposed in the LPR, and is delivered with the maximum possible benefit to the local and wider area. FHL would welcome the opportunity to meet with Wiltshire Council once again to discuss the content of these representations.

T&L17b



• FOWLER ARCHITECTURE •
AND PLANNING •

**SOUTH PARK GARDEN VILLAGE
LUDGERSHALL
VISION DOCUMENT**





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EXECUTIVE SUMMARY

Wiltshire Council's emerging strategy for development to 2036 provides an exciting opportunity to meet development needs in a sustainable way at Ludgershall alongside providing major infrastructure improvements for existing and new residents.

The Wiltshire Local Plan Review has identified that the most sustainable way to deliver the new homes and employment to 2036 will be through the growth of existing Principal Settlements and Market Towns within the proposed four Housing Market Areas.

Fowler Architecture & Planning Ltd (Fowlers), a local company, is promoting the sustainable expansion of Ludgershall on behalf of the landowner [REDACTED]. This Vision Statement demonstrates that the land to the south of Ludgershall, referred to as 'South Park Garden Village', lies within a strategically sustainable A342 / A338 transport corridor and represents the best opportunity to deliver a truly sustainable, community-led and characterful new neighbourhood by following the Garden Cities Principles.

Fowlers have undertaken an initial analysis of the site and its surroundings, examining technical issues relating to access and movement, landscape, flood risk, drainage and utilities, ecology, heritage and ground conditions. This analysis has allowed the team to identify key opportunities and constraints to development, as well as identifying any mitigation necessary and opportunities for new infrastructure. In turn this has shaped the vision for South Park Garden Village. Importantly this analysis, supported by the initial project team, demonstrates that there are no technical 'show stoppers', which would prevent a viable development from coming forward.

Key to the sustainability of the new neighbourhood will be the opportunity to link into the thriving community at Ludgershall / Tidworth Market Town. The scheme also takes advantage of the ability to deliver the long-awaited Southern Connector Road for the A342 and to substantially enhance the public transport potential provided by the reinstatement of the passenger rail services on the Ludgershall line to Andover and beyond.

The landowner wishes to bring this opportunity forward in a way which benefits the wider area, with consultation with the community and key stakeholders. The submission of this Vision Document to Wiltshire Council at the commencement of the Local Plan Review provides all interested parties and stakeholders to be aware of the landowner's aspirations so that the proposals can be fully considered when evaluating how growth will be accommodated to 2036.

The proposals represent a logical extension to Ludgershall, providing an opportunity-led indicative masterplan delivering high quality development and new infrastructure. This masterplan shows how South Park Garden Village can deliver just under 1,700 new homes, a local centre, primary education, as well as key strategic transport infrastructure with the Southern Connector Road and rail services, the relocation of the fire station and around 35 hectares of new publically accessible green space and wildlife corridors.

South Park Garden Village provides a unique opportunity to meet the long term development needs of both Wiltshire and Test Valley Borough Council in a strategically sustainable location through a high quality, sensitive development involving local communities and delivering major infrastructure improvements.



Fig. 1 - Masterplan

Chapter 1

INTRODUCTION

This part of the document provides an introduction to the Ludgershall site as well as a clear vision for the masterplanning proposals.





INTRODUCTION

The land to the south of Ludgershall offers a perfect opportunity within Wiltshire and Hampshire to provide for a high quality new neighbourhood by extending the existing town in a truly sustainable manner.

PURPOSE OF THE DOCUMENT

This vision document supports the proposed allocation of a new neighbourhood at Ludgershall. The environs of the site include land identified by Wiltshire Council in their SHELAA (2017) under site references 553 and 555. Additional land is required to facilitate the A342 bypass within Test Valley Borough Council administrative area to the east in Hampshire.

This document explains and highlights the development potential of the South Park Farm site. It provides an introduction to, and a vision for the site. It also sets out the site's planning policy background, wider context and an overview of its constraints and opportunities.

This document also explains the design process that has led to the current illustrative masterplan for a sustainable community known as 'South Park Garden Village'.

Our work illustrates the potential for key infrastructure including a railway station and reopening of passenger services from Ludgershall, completion of the Southern Connector Road between Empress Way and the A342, around 1,700 new homes, a primary school, a new local centre, relocation of the fire station, expansive areas of open space, sports facilities, and key infrastructure, as well as supporting community facilities.

THE SITE

South Park Garden Village is located within the county of Wiltshire, adjacent to the border with Hampshire and Test Valley Borough to the east.

The site is situated to the south of the town of Ludgershall, which has a population of around 4,427 (2011). It is located to the south of the MoD railway line which services the sidings to the west and connects to the London to Salisbury mainline at Andover. This railway line bisects the town whereby the town centre and ribbon development along Andover Road (the A342) from recent areas of growth to its south. Empress Way was constructed to a distributor road standard as it was envisaged to have a second point of access onto the A342 to the east however this has never been delivered.

The site currently comprises 93.7 hectares of gently undulating arable farmland, which could potentially provide for around 1,700 new homes. The site will deliver the missing Southern Connector Road and could also provide a potential new local centre, primary education, community uses, a site for the relocation of the Ludgershall fire station, local employment opportunities and the reinstatement of passenger rail services.

INTRODUCTION TO FOWLERS

Fowlers is a family-run local practice of Architects, Town Planners and Urban Designers based in Pewsey, Wiltshire who are committed to working with landowners and developers to deliver high quality homes and making places better for people.

We have been working with the farmer and landowner, [REDACTED], since 2012 in a Planning and Urban Design capacity to realise his long-term ambitions for South Park Farm as a logical location to accommodate sustainable growth. Fowlers has secure outline planning permission for the erection of 109 homes, open space etc on a 4.8 hectare site at the eastern end of Empress Way. Recently, Wiltshire Council have published the Housing Site Allocations DPD that has identified a 16.5 hectare site at Empress Way as a preferred option for 270 homes, a two-form entry primary school, open space etc. This includes land approved under E/2013/0234/OUT that will be comprehensively developed. At the time of writing a section 78 appeal is pending for this development.

Key	
	Site Boundary
	Wiltshire Council Land



Fig. 2 - The Site

VISION





Our vision is to create a **sustainable extension** to Ludgershall that follows the principles of **Garden Cities** to raise the profile of the town. The new development will be a holistically planned new neighbourhood, which enhance the natural environment and provide **high-quality affordable housing** and locally accessible jobs in beautiful, healthy and sociable communities.

At the heart of the development is its ability to deliver growth to create a **more balanced community** and acts as a catalyst to **attract inward investment to diversify local employment**. This can be achieved by the provision of **improved road infrastructure** and investment to **create rail services**, as well as providing all of the necessary additional infrastructure required to sustain this larger community.

A strong landscape framework will provide **extensive new green space** in and around the neighbourhood, **new walking and cycling routes**, as well as new facilities on site including a **railway station, education, local shops, community facilities and healthcare** – all within walkable distance of existing and new communities.

The development has the potential to substantially benefit Ludgershall and the wider communities. These communities will be at the heart of the **place making process**, their involvement will be key to the delivery, management and long term success of the project.

Chapter 2

PLANNING POLICY

This section of the document outlines the current position of the site in relation to its draft allocation and in the context of current planning policy.





PLANNING POLICY

Ludgershall is a sustainable location offering the potential for significant development at the Market Town that will be a catalyst to enhance services and facilities and promote better levels of self-containment and viable communities

THE DEVELOPMENT PLAN

The Wiltshire Core Strategy (2006-2026) identifies both Tidworth and Ludgershall as a 'Market Town'. Outside the Principal Settlements, Market Towns are defined as settlements that have the ability to support sustainable patterns of living in Wiltshire through their current levels of facilities, services and employment opportunities. Market Towns have the potential for significant development that will increase the jobs and homes in each town in order to help sustain and where necessary enhance their services and facilities and promote better levels of self-containment and viable sustainable communities.

Ludgershall is presently within the East Wiltshire HMA, largely covering the former Kennet District Council administrative area. The Core Strategy identifies the need for about 1,750 new homes at Tidworth and Ludgershall to 2026. A Strategically Important Allocation for 475 dwellings at Drummond Park, which will be developed by the HCA with at least 50% of the homes delivered under the Government's Starter Homes Programme.

EMERGING HOUSING SITE ALLOCATIONS DPD

Wiltshire Council has published their Preferred Options for housing growth to 2026 in the Housing Site Allocations DPD in July 2017. Proposed Policy H1.1 involves the allocation of approximately 16.5 hectares of land at Empress Way for a mixed use development comprising the following elements:

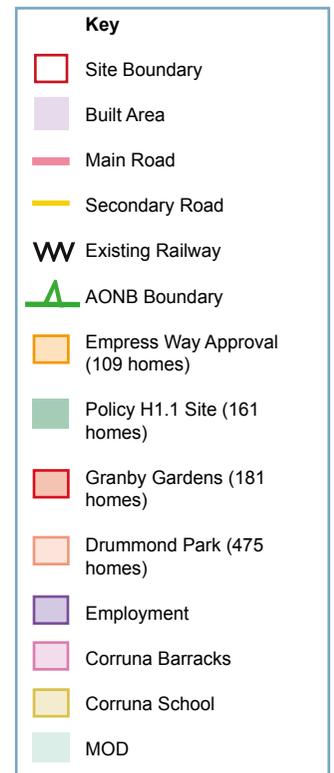
- approximately 270 dwellings;
- a connecting highways link between Empress Way and Simonds Road/New Drove, via the adjoining development at the former Granby Gardens site;
- 1.8ha of land reserved for a two-form entry primary school;
- A strong landscape framework including significant screening to the southern and eastern boundaries of the site.

The proposed allocation is to extend around 4.8 hectares of land already benefiting from planning permission (E/2013/0234/OUT) for housing development to allow for a further 160 dwellings. The DPD recognises the site is a logical extension to the town in an accessible location with regard to local services and facilities. Vehicular access to the proposed DPD allocation would be required from Empress Way and via the Granby Gardens development site. Development of the site will include a connecting link road through the site to the two points of access. This is a long-standing aspiration for the comprehensive proper planning of the area as stated in Kennet Local Plan Saved Policy HC16.

Development of the proposed allocation will include 1.8ha reserved for a 2 form entry primary school. Based on current estimates local primary school capacity will be absorbed by committed development elsewhere in the town. The need to retain the reserved land for a school will be determined as part of the application process based on demand for

primary school places at that time.

The DPD envisages development of the allocation will be led by a strong landscape framework. Significant additional screening at the southern and eastern site boundaries would be required, along with landscaping and green infrastructure throughout the site.



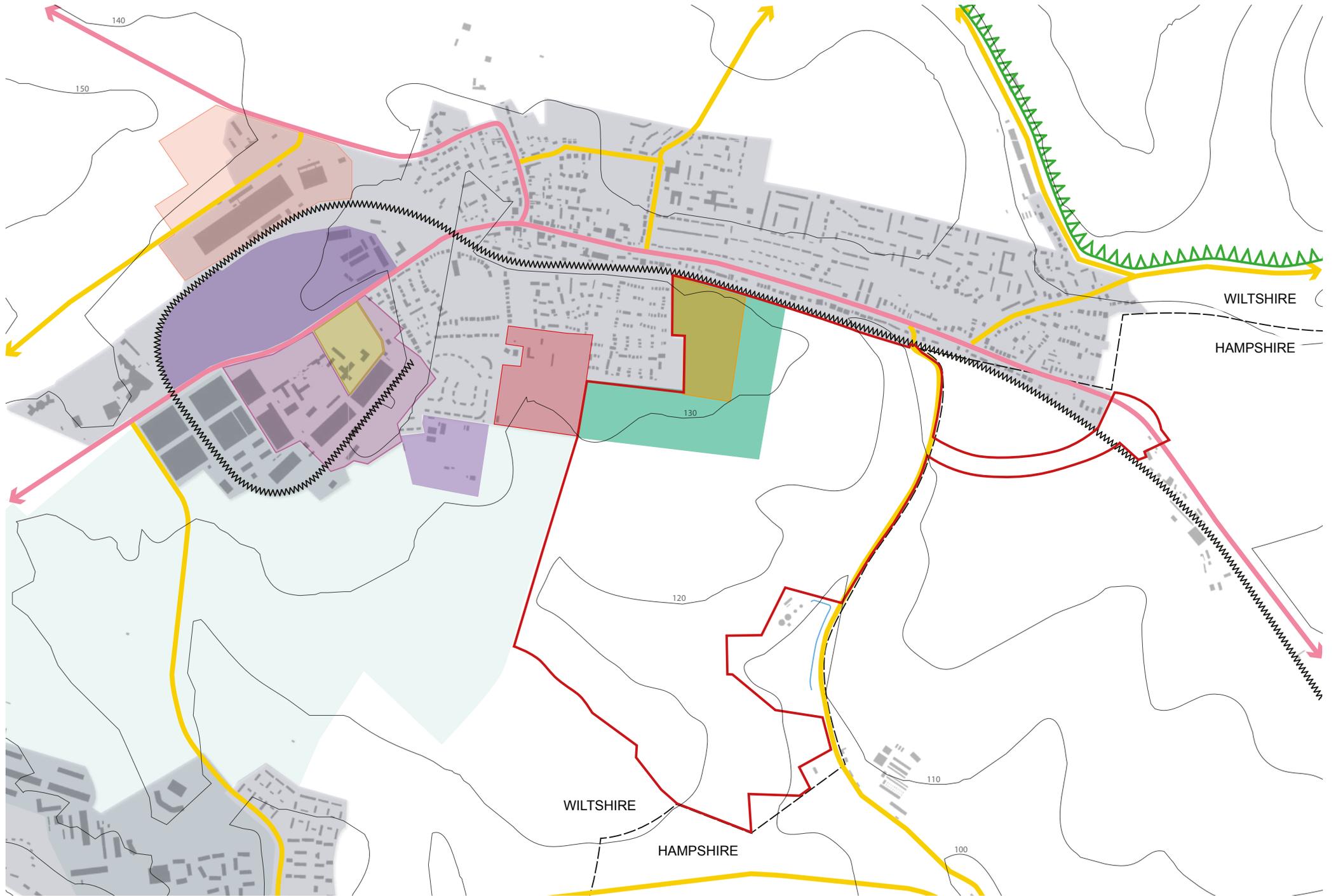


Fig. 3 - Planning Context

Wiltshire Council is preparing a Local Plan Review. The SHMA indicates that Swindon Borough Council and Wiltshire Council should plan for a minimum of 3,650 new homes between 2016 and 2036. The identification of Ludgershall forming part of the Andover functional HMA prompts a requirement to reconsider the cross-boundary strategic context and enhancing public transport links.

EMERGING WILTSHIRE LOCAL PLAN REVIEW

A review of adopted Local Plan for Wiltshire is assessing the future levels of need for new homes and employment over the period 2016-2036 and to provide an appropriate basis for housing, employment and infrastructure provision over that period.

Wiltshire Council are closely working with Swindon Borough Council leading to the publication of the Joint Spatial Framework (JSF) Issues Paper in November 2017. The JSF, which will be a non-statutory planning document, is in response to the Swindon & Wiltshire Strategic Housing Market Assessment (SHMA) that redefines the HMAs across local authority boundaries. The purpose of the JSF will therefore set out in broad terms the quantum and spatial distribution of new jobs, homes and infrastructure to 2036.

The timetable for the completion of the JSF is Q2 2019, leading to the submission of the Local Plan Review in Q1 2020 and estimated adoption in Q1 2021.

The SHMA indicates that Swindon Borough Council and Wiltshire Council should plan for 3,650 new homes per year between 2016-2036. This equates to a need to find land to accommodate a further 27,000 homes would be needed to deliver the scale envisaged by the SHMA.

The SHMA redefines the HMAs with four proposed to define the strongest key functional linkages between places where people live and work (Swindon, Chippenham, Salisbury and Trowbridge).

The SHMA identifies that Ludgershall is in the Salisbury Broad Rental Market Area, but in the Andover commuting and migration zones, and therefore allocated to the Andover functional HMA. The Andover HMA covers 3.5% of Wiltshire's population and is the only functional HMA surrounding Swindon and Wiltshire which covers more than 1% of Wiltshire by population. Of a total population of 84,900 in the functional HMA, 16,200 live in Wiltshire focused at Ludgershall, which is 19.1% of the population of the Andover HMA.

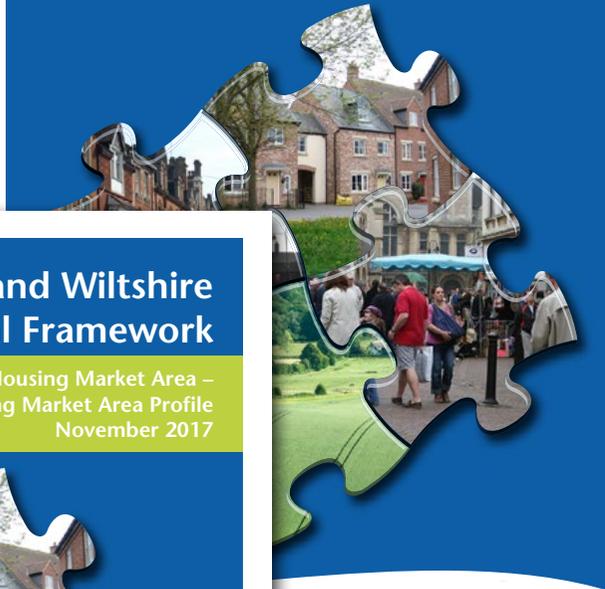
The SHMA proposes to advocate a 'best-fit' approach and proposes to designate the Salisbury HMA to include Ludgershall, which would retain its 'Market Town' status in tier two of the settlement hierarchy. The SHMA identifies a need for 8,250 dwellings in the Salisbury HMA to 2036, of which approximately 8,000 homes have been built or committed.

This document provides evidence to demonstrate that the South Park Garden Village site can deliver at least 1,800 dwellings in the period 2016 to 2036 and beyond (including the 270 already identified in the Housing Site Allocations DPD) in a sustainable manner, with no technical issues that would restrict or delay development.

Significantly greater benefits can be gained and delivered through the proposed new neighbourhood in comparison to alternative approaches. The new neighbourhood builds upon an existing Market Town which is recognised to be capable of significant development to enhance services and facilities and promote better levels of self-containment and viable communities. Only the proposed development can deliver the missing Southern Connector Road and enhance sustainable transport by investment to create the railway station and reinstatement of passenger services.

Swindon and Wiltshire Joint Spatial Framework

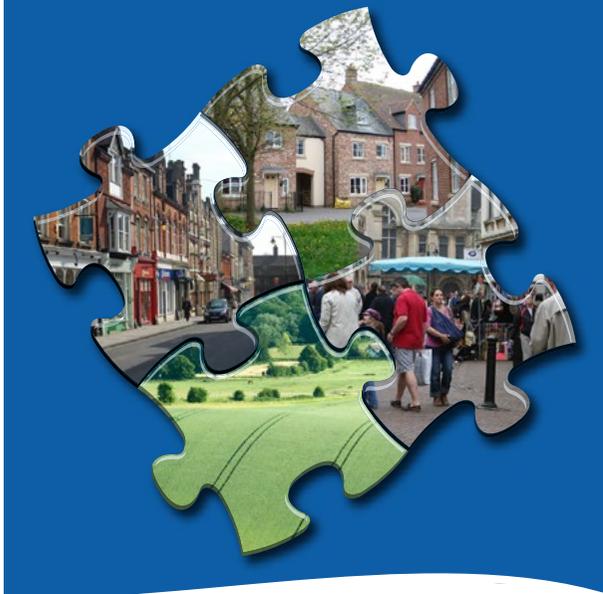
Issues Paper
November 2017



Swindon
BOROUGH COUNCIL

Swindon and Wiltshire Joint Spatial Framework

Salisbury Housing Market Area –
Individual Settlement and Housing Market Area Profile
November 2017



Swindon
BOROUGH COUNCIL

Wiltshire Council
Where everybody matters



Wiltshire Housing Site Allocations Plan

Pre-submission draft plan

June 2017

Wiltshire Council
Where everybody matters

H1.1 Empress Way

Figure 5.1 H1.1 Empress Way



Policy H1.1

Land at Empress Way, as identified on the Policies Map, is proposed for mixed use development comprising the following elements:

- approximately 270 dwellings;
- a connecting highways link between Empress Way and Simonds Road/New Drive, via the adjoining development at the former Granby Gardens site;
- 1.8ha of land reserved for a two form entry primary school.
- A strong landscape framework including significant screening to the southern and eastern boundaries of the site

Development will take place in accordance with a masterplan for the site approved by the Council as part of the planning application process.

5.17 Approximately 16.5ha of land at Empress Way, as shown on the policies map, are allocated for development. The proposal is to extend land already with permission¹⁷¹ for housing development to allow for a further 160 dwellings. The total amount of development will therefore be 270 dwellings. The treatment and design of the site will be one comprehensive development proposal.

¹⁷¹ Outline planning permission reference E/2013/02234/OUT (land adjacent to Empress Way).

Chapter 3

UNDERSTANDING LUDGERSHALL AND SOUTH PARK GARDEN VILLAGE

This section summarises the baseline work that has been carried out by the consultant team to date. This looks at the site in the context of its immediate surroundings and the wider context of the Tidworth/Andover area.





WIDER CONTEXT

South Park Garden Village is set within gentle undulating farmland to the south of Ludgershall. This strategic location within the Andover functional HMA alongside existing and future sustainable transport links to Andover and Tidworth, make this site an appropriate location for a new neighbourhood.

STRATEGIC CONTEXT

The development site is located within the county of Wiltshire, adjacent to the border with Test Valley Borough to the east that is defined by Shoddesden Lane. The site includes land within Test Valley Borough on Andover Road and farmland that is required to facilitate the eastern access to the A342 at Faberstown.

The site is situated around 8.5km north west of the town of Andover and around 3km east of the town of Tidworth. The site is situated on the A342/A338 corridor that acts as a key strategic route to connect central and eastern Wiltshire to the A303 and Hampshire towards London.

The town of Ludgershall is connected to the main line rail network at Andover by a branch line, which forms the northern boundary of the site. This branch line, formerly part of a through route between Cheltenham and Southampton, was retained following closure of the rest of the line in 1962 to provide a freight only link to the MoD. depot at Ludgershall. It is operated on a one train working basis.

LOCAL CONTEXT

The town of Ludgershall lies to the north and west of the site. The central core of the town is centred around the junction with Andover Road and High Street that leads to Ludgershall Castle. The town contains a wide variety of services and facilities including the Memorial Hall, primary school, the Wellington Academy, public houses, convenience retail, Post Office, doctors surgeries etc.

The town has a strategic 12 hectare employment site at Castledown Business Park – that has significant land remaining to be developed due to slow take up meaning there is a shortage of quality employment premises in the area. As a result, there is significant out-commuting encouraged by the good road connectivity, to Andover in particular, because there is limited employment beyond jobs associated with the MoD. As a result, currently planned and additional growth has significant impact on delays at the memorial junction in Ludgershall and Andover Road in general.

Late 20th century development has largely occurred to the south of the railway line of Astor Crescent and Empress Way, including the recent construction of circa 180 homes at the former Granby Garden Centre site. The construction of Empress Way from the junction with the A3026 at Tidworth Road was built to a distributor road standard owing to the opportunity to extend eastwards to the A342. There is a designated conservation area extending to cover the characterful historic core which includes several listed buildings and the schedule remains of

Ludgershall Castle. The town developed throughout the 20th century in a strong linear form eastwards from the historic core towards Faberstown. The town is bisected by the Ludgershall/Andover freight only railway line which parallels the A342 Andover Road in an east-west direction. The area north of the railway is comprised generally of residential development, with town centre services and facilities being located to the west of this area.

Ludgershall and the wider community area will receive an economic boost from the stationing of an additional 4,000 troops as a result of the army restructuring and rebasing programme. Two sites are being developed by the MoD in the locality with 246 service family homes and a primary school being developed at Corunna Barracks and further units at Perham Down. This growth in service personnel exacerbates the already existing imbalance between the military and civilian population.



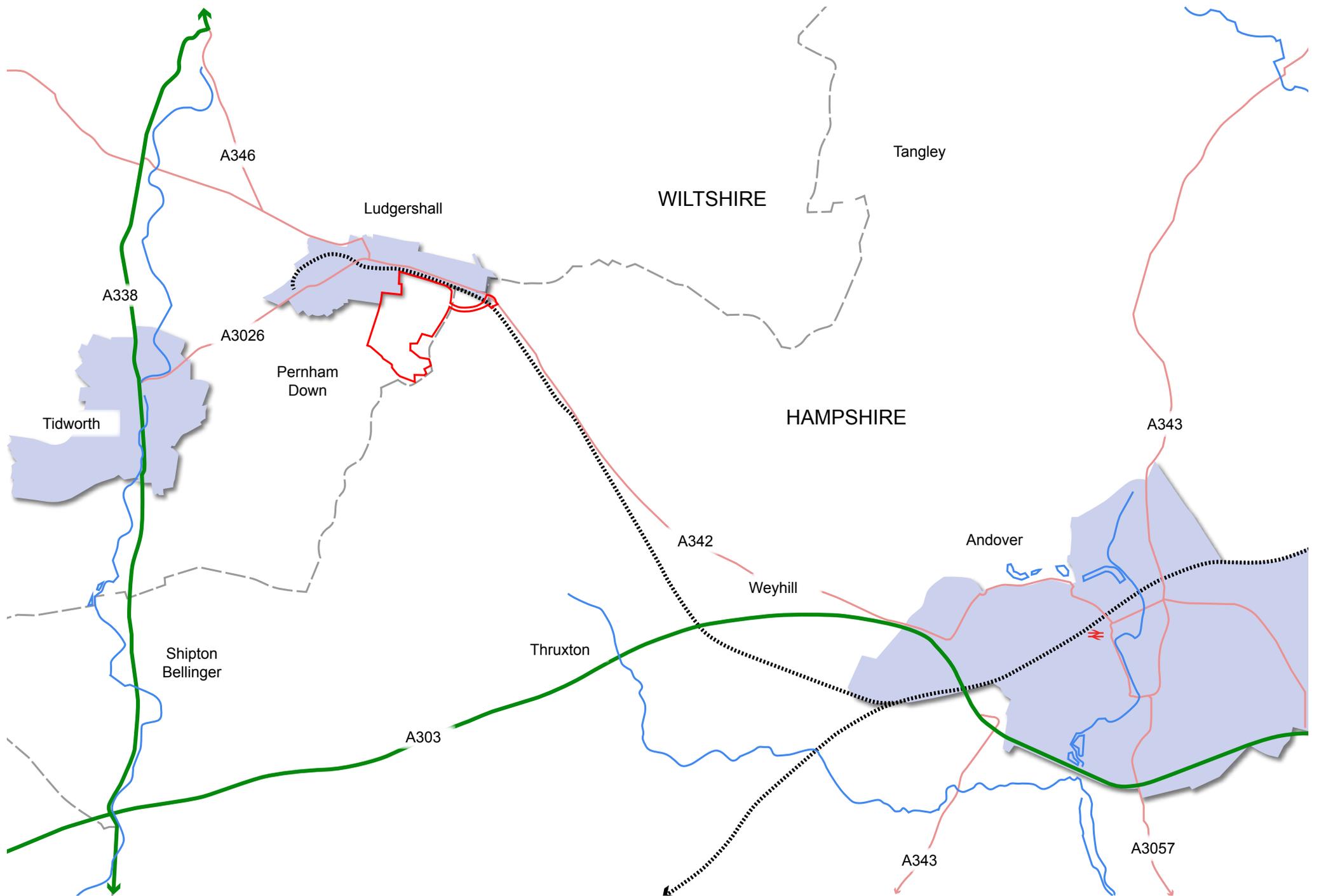


Fig. 4 - Strategic Context

THE SITE

The site comprises 93.7 hectares of gently undulating arable fields to the south of Ludgershall.

THE SITE

The South Park Farm site comprises agricultural land in arable use located adjoining the built-up area of Ludgershall, to the south east of the town. To the west is an existing housing estate at Camomile Drive containing predominately detached two storey housing. To the north is a branch line off the Andover to Salisbury national rail line which serves the MoD facilities at Ludgershall. To the east and south are open fields. To the south west is a small parcel of public open space with is accessed off Orchard Drive.

The site benefits from an existing vehicular access off Empress Way, which connects to the main road network at the junction with Tidworth Road (A3026) to the west. Empress Way has been constructed to a reasonable standard with pedestrian footways on both sides and street lighting as it was envisaged to be extended eastwards to the A342 to provide a Southern Connector Road

The site extends to a total of 87.6 hectares within the County of Wiltshire. This is inclusive of the 16.5 hectare site that is proposed to be allocated for the mixed-use development in Policy H1.1 'Land at Empress Way' in the Wiltshire Housing Site Allocations DPD. An additional 6 hectares of land is required in Hampshire within Test Valley Borough in order to facilitate the construction of the access to link Empress Way to the A342 via the proposed Southern Connector Road. The total site area therefore extends to 93.7 hectares.



Fig. 5 - Figure Ground



Fig. 6 - The Site

ACCESS & MOVEMENT

EXISTING SITUATION

The South Park Garden Village Site is located on the A342/A338 corridor that provides excellent linkages to the A303. These connections ensure a strong functional link to Andover in Hampshire, whereby Ludgershall and environs are located within the Andover commuting zone with over 50% of workers travelling to and from Ludgershall / Andover.

The site is bounded to the north by a branch line. This branch line, formerly part of a through route between Cheltenham and Southampton, was retained following closure of the rest of the line to provide a freight only link to the MoD. depot at Ludgershall. It is operated on a one train working basis. There is currently no railway station at Ludgershall and no passenger services. The eastern boundary of the site is defined by Shoddesden Lane that is a narrow single width carriageway with a substandard access with poor alignment and visibility onto Andover Road.

With strong commuting and migration flows between Ludgershall and Andover, there are known capacity constraints on the A342, including at the War Memorial Junction, to accommodate housing growth. The delivery of a Southern Connector Road to link the A338 via the North East Quadrant at Tidworth, the A3026, Empress Way to the A342 would enable the downgrading of the A342 at High Street.

STUDIES UNDERTAKEN

- Full Transport Assessment of the ability of the existing local transport network to accommodate traffic movements while solely utilising the Empress Way to Simmonds Road Loop Road.
- Review of the feasibility for extending Empress Way to the A342 as a Southern Connector Road for Ludgershall, including crossing of the railway line.
- Preliminary feasibility study of the infrastructure works required to reinstate passenger services on the Ludgershall to Andover railway line.

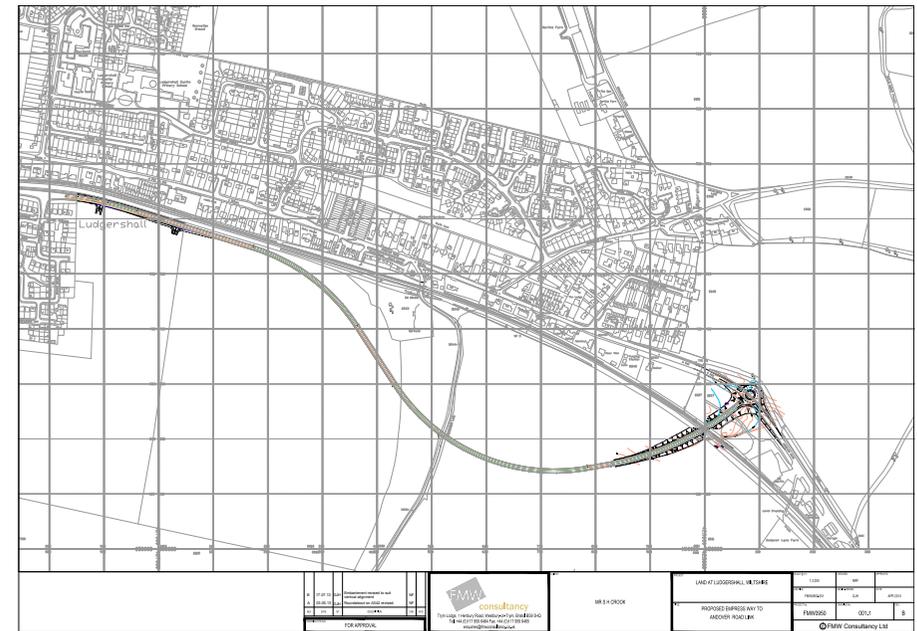


Fig. 7 - Concept Scheme for Southern Connector Road



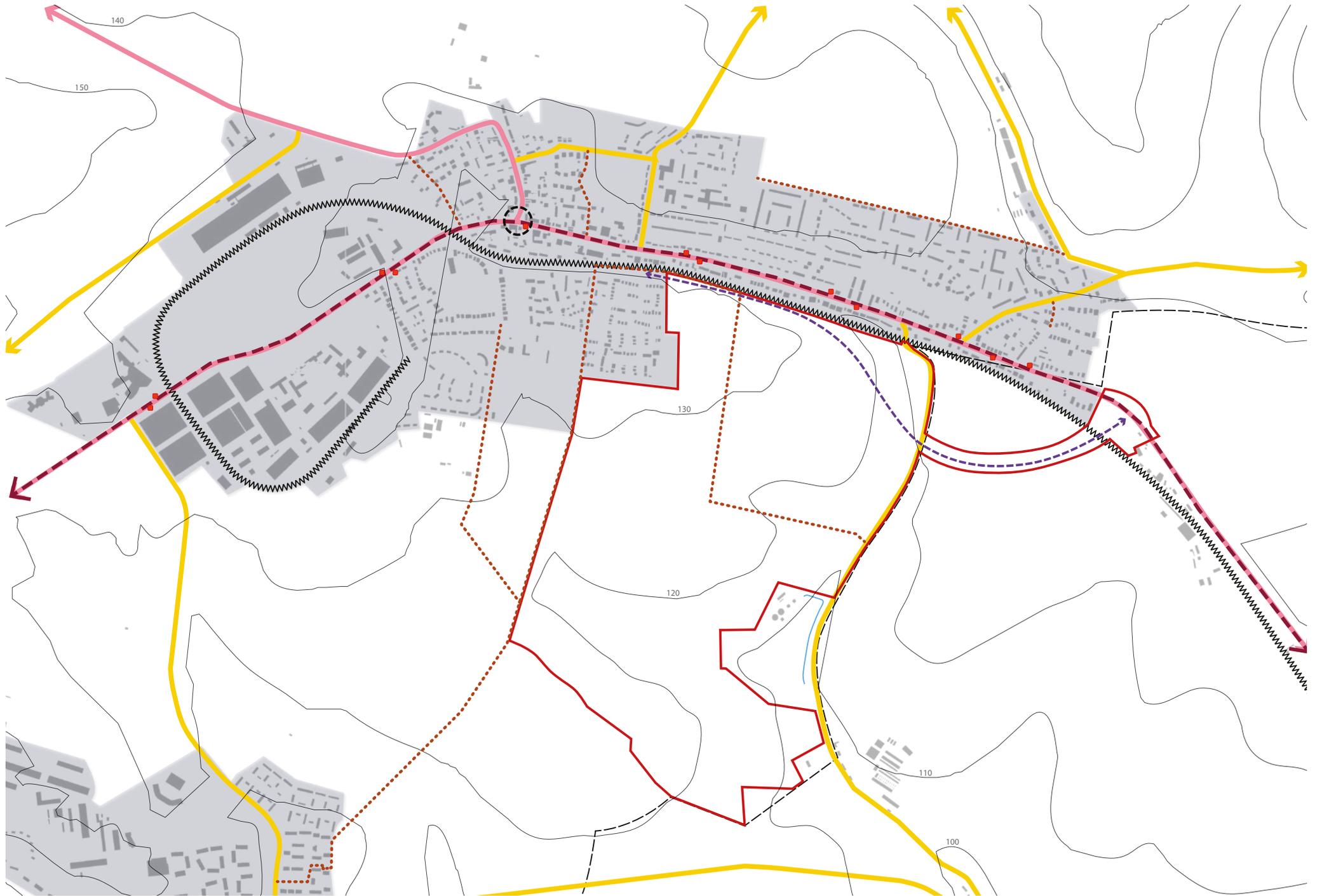


Fig. 8 - Access and Movement

SOUTHERN CONNECTOR ROAD

The first phase of the site would involve the development of the 16.5 hectare site identified in the emerging DPD. An access road will provide a through route from Tidworth Road via Simmonds Road to Empress Way and back to Tidworth Road. This would provide two points of access to the Empress Way area where only one currently exists.

The second phase is likely to trigger the requirement for an additional connection to the strategic highway network. As indicated previously, the key link in the highway network in the area is the A342. In addition to providing for vehicle access to the development site, the highway network described above would cater for public transport, pedestrian and cycle movements within the site and to/from external destinations.

The link eastwards to the A342 requires a crossing of the railway line. The feasibility study has established the preferred location for the crossing and its connection with the A342 Andover Road has been identified as the area of an existing layby on the A342 adjoining the eastern boundary of the town, where the alignment of the road and rail routes diverge slightly. An overbridge has ultimately been identified as being the most appropriate option from a technical perspective and also from drawing on contacts with Network Rail and other organisations.

RAILWAY SERVICES

A feasibility study was commissioned to report on the scope and indicative costs of the infrastructure works required to provide a passenger service on the freight only branch between Ludgershall and the main London - Basingstoke – Exeter line at Andover. Currently this line is worked on a “one train in operation” basis and there is no direct access at Andover. The works would include a new basic station at South Park Garden Village, upgrading of the existing branch to passenger standards, modifications at Andover station and other option specific track and signalling works. Three options are to be considered:

Option 1 - This would retain the existing “one-train in operation” working such that passenger and freight trains would be mutually exclusive. A shuttle service would operate between Ludgershall and Andover.

Option 2 - By putting the new station at Ludgershall on a separate track and providing additional signalling, it would be possible to operate a freight train with a passenger train on the branch. As with option 1, a shuttle service would operate between Ludgershall and Andover.

Option 3 - This provides additional connections into the main line at Andover to allow direct through running to and from Basingstoke/ London.

SUMMARY

In the early stages of development, the proposals at South Park Garden Village will benefit from the good range existing facilities and services within Ludgershall, alongside the new primary school, if this is required. This means that even in the very early years of development residents at the site will have the opportunity to use the local facilities to minimise the need to travel.

The site provides for improved highways infrastructure through the extension of Empress Way eastwards to join the A342. The completion of the Southern Connector Road will align with existing local strategies to reduce congestion in Ludgershall and appropriate distribute traffic movements. Furthermore, this would also provide improved pedestrian and cycle connections, including an extension of the cycle link from Ludgershall to Weyhill.

An exemplar Travel Plan will be created to make the most of the opportunity presented by the re-establishment of rail passenger services to Andover and beyond, including land for the delivery of the railway station and financial contributions towards the infrastructure works. The Plan also provides the opportunity to form car clubs and the provision of electric vehicle charging points in all dwellings and in the station car park. Residents will be encouraged to use the train and enhanced bus services that will serve the site

DELIVERABILITY

The development of South Park Garden Village presents the opportunity to deliver, in transport terms, a sustainable community right from the outset given the proximity to readily available public transport, as well as access to the existing facilities which already exist within Ludgershall.

Crucially, the development will unlock opportunities to deliver sustainable transport mode, giving people a real choice about how they travel. The provision of the Southern Connector Road and rail passenger services will widen transport choice and minimise conflict between traffic and other users on Andover Road and High Street, thereby promoting the growth of Ludgershall as part of the wider Andover HMA.



LANDSCAPE

EXISTING SITUATION

The site is located to the south and south east of the town of Ludgershall. It comprises an open and gently undulating landscape falling eastwards towards Shoddesden Lane. The farmland is characterised by large arable fields with some remnant hedge lines with a few mature oaks and ash. There are no TPOs within the site.

The highest point of the site is near the western boundary adjacent to the public open space at Princess Mary Gardens. The land falls in two directions from this point, northwards towards the railway line, and to the south and east boundaries towards Shoddesden Lane and the sewage treatment works.

The North Wessex Downs Area of Outstanding Natural Beauty lies to the north of Ludgershall, approximately 1km from the site.

A public footpath – reference LUDG2 - runs east along Empress Way from the pedestrian crossing over the railway line. The footpath continues along the northern boundary of the site until the east side of the field boundary, before returning south and then east to link with Shoddesden Lane. Footpath LUDG1 runs along the far western boundary of the site to Granby Gardens on a north to south route

STUDIES UNDERTAKEN

- Site visit
- National and Regional Landscape Character Assessment
- Local Landscape Character Assessment of Kennet Landscape Character Assessment (1998); Wiltshire Landscape Character Assessment (2005); Kennet Landscape Conservation Strategy (2005)
- Magic Map

SUMMARY

The site is a logical extension to the town being at its southern edge and contained by Shoddesden Lane, however there are limited established natural boundaries that help to enclose the site. There are no field boundaries or woodland planting on the site's southern and eastern edges

The site design will be led by a strong landscape framework. Significant additional screening at the southern and eastern site boundaries would be required, along with landscaping and green infrastructure throughout the site as there are middle and long distance views of the site from the south.

DELIVERABILITY

The site currently has no national or local landscape designations attributed to it which would suggest the landscape is currently of low landscape value. The site is within the Chute Forest Landscape Character Area where the development will accord with the relevant Enhancement Priorities that include: planting of large blocks and belts of native broadleaved woodland on arable or cultivated land, to link with existing woodlands and to restore or reinforce a mosaic of woodland and farmland; maintaining existing roadside hedgerows and trees, including avenues, and replace where these have been removed or weakened through neglect; and establish strong landscape structure to accommodate new development on the fringes of urban areas and settlements.

The development will link into existing and planned Green Infrastructure with extensive new landscape framework of open space within the site. This will be achieved through improvements to the footpath/ cycle networks including the downgrading of Shoddesden Lane to a greenway, provision of play areas and parklands together with new hedge and tree planting, species rich grass mixes, flowering lawns, wildflower planting, seasonal bulbs, native shrub mixes and ornamental planting. All of which will help to define the character of South Park Garden Village, enrich biodiversity across the site and create opportunities for a landscape led development.

Key	
	Site Boundary
	Built Area
	Main Road
	Secondary Road
	Railway
	Water
	AONB Boundary
	MOD
	Arable Land
	Pasture
	Woodland
	Ancient Woodland
	Parkland
	Hedgerows
	Broken Hedgerows
	Trees
	Amenity Open Space
	Contours

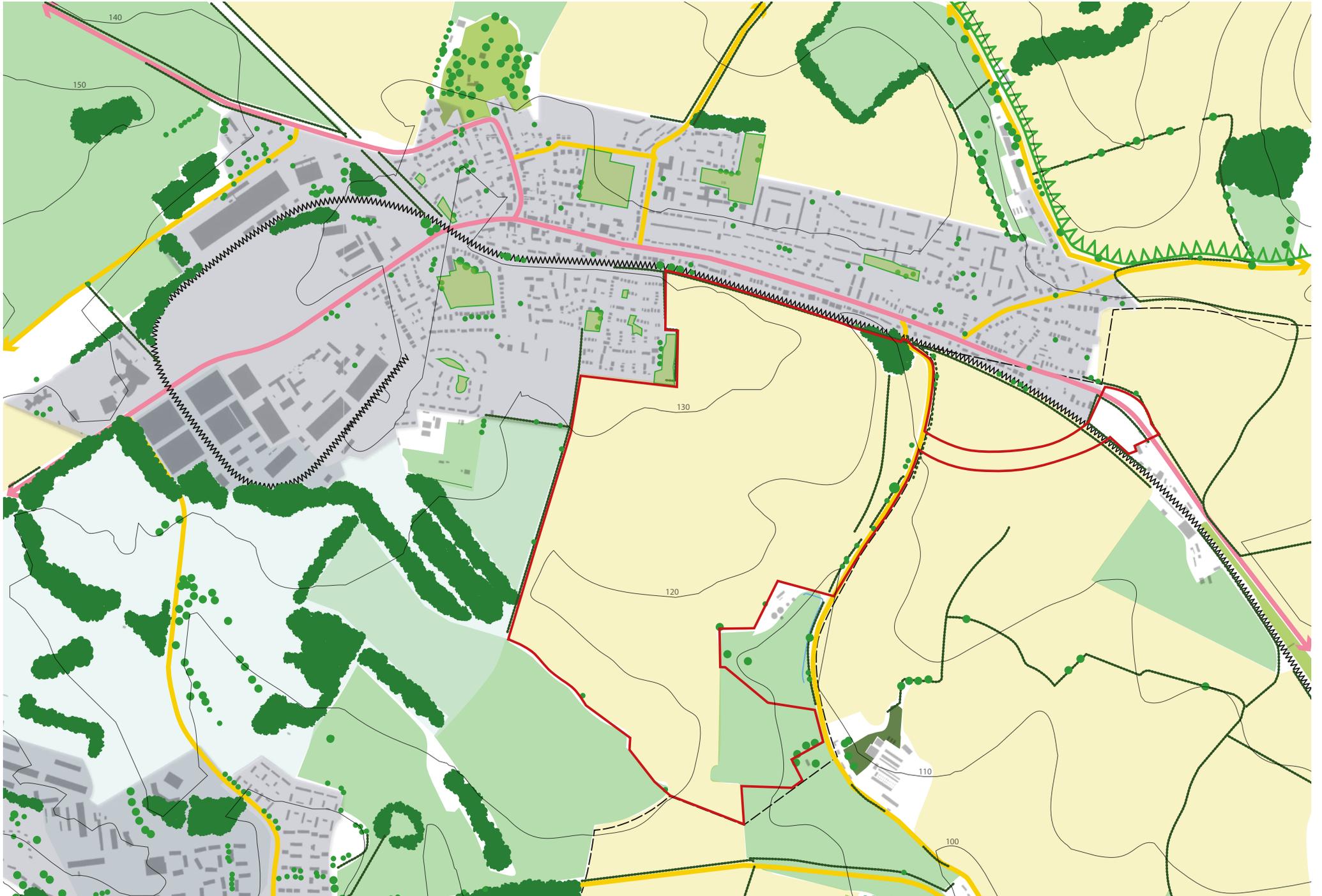


Fig. 9 - Landscape

HERITAGE

EXISTING SITUATION

South Park Farm occupies part of an area that was formerly the southern park associated with Ludgershall Castle, a royal castle that was popular with a number of medieval monarchs who used it as a hunting lodge. The park was in existence by the late thirteenth century and was still stocked with deer in 1549. By the late eighteenth century most of the land in the parish lay within three farms including South Park Farm. The site of the farm is clearly shown on various historic maps including Andrews and Dury's Map of Wiltshire 1774. Sometime between 1820 and 1841 the farm buildings at the site of South Park Farm had been demolished.

The closest part of the Ludgershall Conservation Area is located around 350m to the north-west. Intervening built form and other modern housing, together with the remains of Ludgershall Castle, make up the immediate setting of the Conservation Area.

The general chalkland landscape is of archaeological interest. An initial survey has revealed that all pottery from the archaeological evaluation can be broadly described as being from the Romano-British period, suggesting that evidence for activity can be limited to this period. The nature of the assemblage does not lend itself to further investigation at this time.

STUDIES UNDERTAKEN

- Wiltshire and Swindon Historic Environment Record
- Archaeological evaluation (in part)
- Magic Map



Fig. 10 - Historical Map

SUMMARY

The existing archaeological assessment of the 16.5 hectare DPD site has not revealed any buried finds of significance, however the wider site does offer potential for below ground archaeological deposits therefore mitigation will be required through evaluation. As the site has been in agricultural use, any impact is anticipated to only affect assets of low importance. A number of heritage assets are recorded within the wider study area however there is no identifiable intervisibility with the historic core of Ludgershall, including the Conservation Area and various listed buildings due to existing development and infrastructure. Heritage and archaeology is therefore not a significant obstacle subject to appropriate masterplanning.

DELIVERABILITY

Mitigation is identified through evaluation of non-designated heritage assets of archaeological interest. This will establish whether any below ground remains are likely to be demonstrably of equivalent significance to scheduled monuments, and should be considered subject to the policies for designated heritage assets.

Key	
	Site Boundary
	Built Area
	Main Road
	Secondary Road
	Railway
	Water
	Conservation Area
	Scheduled Monument
	Listed Buildings

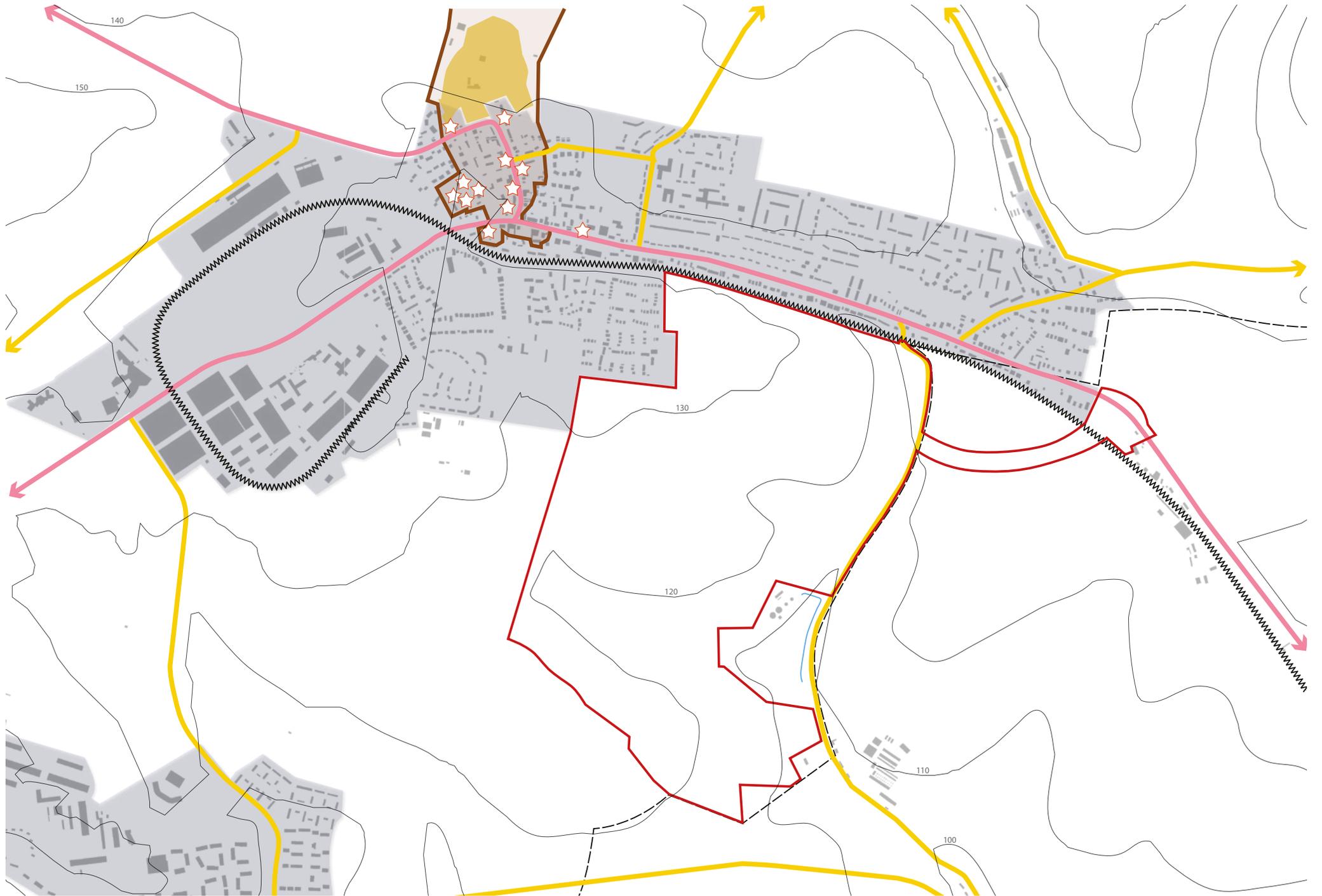


Fig. 11 - Heritage

GROUND CONDITIONS

EXISTING SITUATION

The site comprises arable agricultural land comprising a series of large fields. The surrounding land uses are residential in nature to the north and west which do not pose a contamination concern. Any risks associated with the garden centre / nursery use of the former Granby Garden Centre site have been resolved by its redevelopment for housing.

STUDIES UNDERTAKEN

- A desk based study (Preliminary Appraisal report) has been prepared for the site, including an assessment of information provided by the Landmark Information Group, the British Geological Survey, local councils, and online information available from the Environment Agency.
- ADAS Agricultural Land Quality Report May 2016
- Magic Map

SUMMARY

The site has remained in use as agricultural land since the earliest available OS map and historic land use is not considered to pose a constraint to development.

The underlying natural geology of the Site is mapped as 'Seaford Chalk Formation'; sedimentary bedrock formed approximately 83 to 89 million years ago in the late Cretaceous Period (British Geological Survey 2014). Although there are no superficial geological deposits listed as being present on site, there are 'head' deposits very close to the site where clay-with-flint capped much of the natural chalk. Ground conditions are not expected to cause significant constraints to development at the site.

The Natural England 1:250000 Series Agricultural Land Classification Map for the South West Region (10-111f) identifies the Site to comprise Grade 3 'Good to Moderate' Agricultural Land. Further evaluation associated with the DPD site has confirmed the subdivision Grade 3A on the majority of the site.

DELIVERABILITY

There are no significant ground conditions or contamination risk, which would preclude development in any part of the site. Further geo-environmental investigations are therefore not required until the detailed design stage of the development. To assist with design of a development scheme, a ground investigation will be undertaken. This will include trial pitting and the drilling of boreholes to establish ground conditions, allow installation of gas/groundwater monitoring wells and to enable soil and groundwater samples to be collected for both geo-technical and chemical analysis.

The development would represent the significant development of the best and most versatile agricultural land. The wider sustainability benefits of the South Park Garden Village proposals is considered to outweigh the economic and other benefits of the best and most versatile agricultural land. The benefits cannot be achieved through alternatives on areas of poorer quality or brownfield land as the site is a logical development location that unlocks the potential for the strategic transport infrastructure.



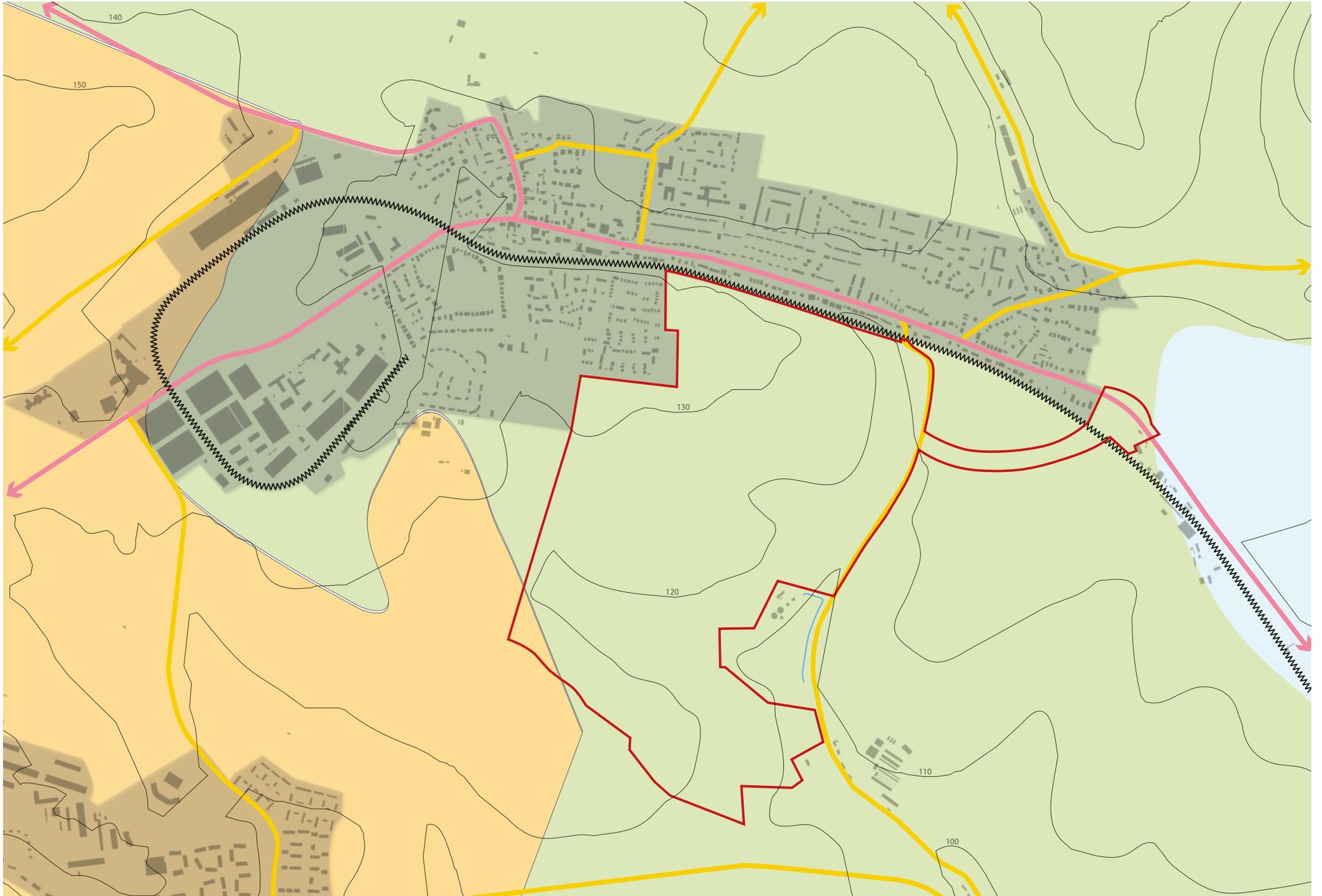


Fig. 12 - Ground Conditions

INFRASTRUCTURE

EXISTING SITUATION

The Environment Agency Flood Map for Planning shows that the site is located in Flood Zone 1 (i.e. lowest risk – outside the 1 in 1,000 annual probability event flood outline). The Environment Agency identifies areas at risk from surface water flooding along Shoddesden Lane and to the south associated with the dry channel with a southward flow towards the Pillhill Brook.

The site adjoins the existing Ludgershall Waste Water Treatment Works (WWTW), operated by Southern Water. There are foul and surface water sewers within the site subject to easements.

Ground conditions are expected to be suitable for infiltration. The site is within a ground water vulnerable area and this will influence the design of the base of any soakaway and the agreed top water level of any ground water.

STUDIES UNDERTAKEN

- Initial appraisal of flood risk
- Preliminary discussions with utility providers

SUMMARY

Flood risk and drainage are no constraint to development. The site is considered to be at low risk of fluvial flooding, and has ample space to provide the required surface water attenuation, for infiltration options.

The site can be served via conventional connections; responses from the respective gas and electricity indicate that connections could be made, subject to the implementation of reinforcement works.

Similarly, the site can be served with water and sewerage connections, subject to reinforcement works.

DELIVERABILITY

The proposals are deliverable in respect to flood risk and drainage, as all development will be located in Flood Zone 1, and the layout will be designed to ensure that a deliverable surface water drainage scheme can be designed. This would include measures to alleviate the risk of increased flooding off-site.

The site is also deliverable from a utilities perspective; reinforcement will allow conventional connections to be made in order to serve the site with key utilities.

The proximity to the WWTW will be addressed in the masterplan. Uses that are sensitive to odour pollution would be located an appropriate distance from the WWTW. The position of easements will be addressed in the masterplan.

Key	
	Site Boundary
	Built Area
	Main Road
	Secondary Road
	Railway
	Water
	Sewage
	Sewer Lines
	Allotments
	Amenity Open Space
	Sports Playing Fields
	Sports and Social Club
	Schools
	Churches
	Memorial Hall
	Pubs/Restaurants
	Local Shop/Post Office
	Bus Stops
Surface Water Flooding	
	Low Flood Risk
	Medium Flood Risk
	High Flood Risk

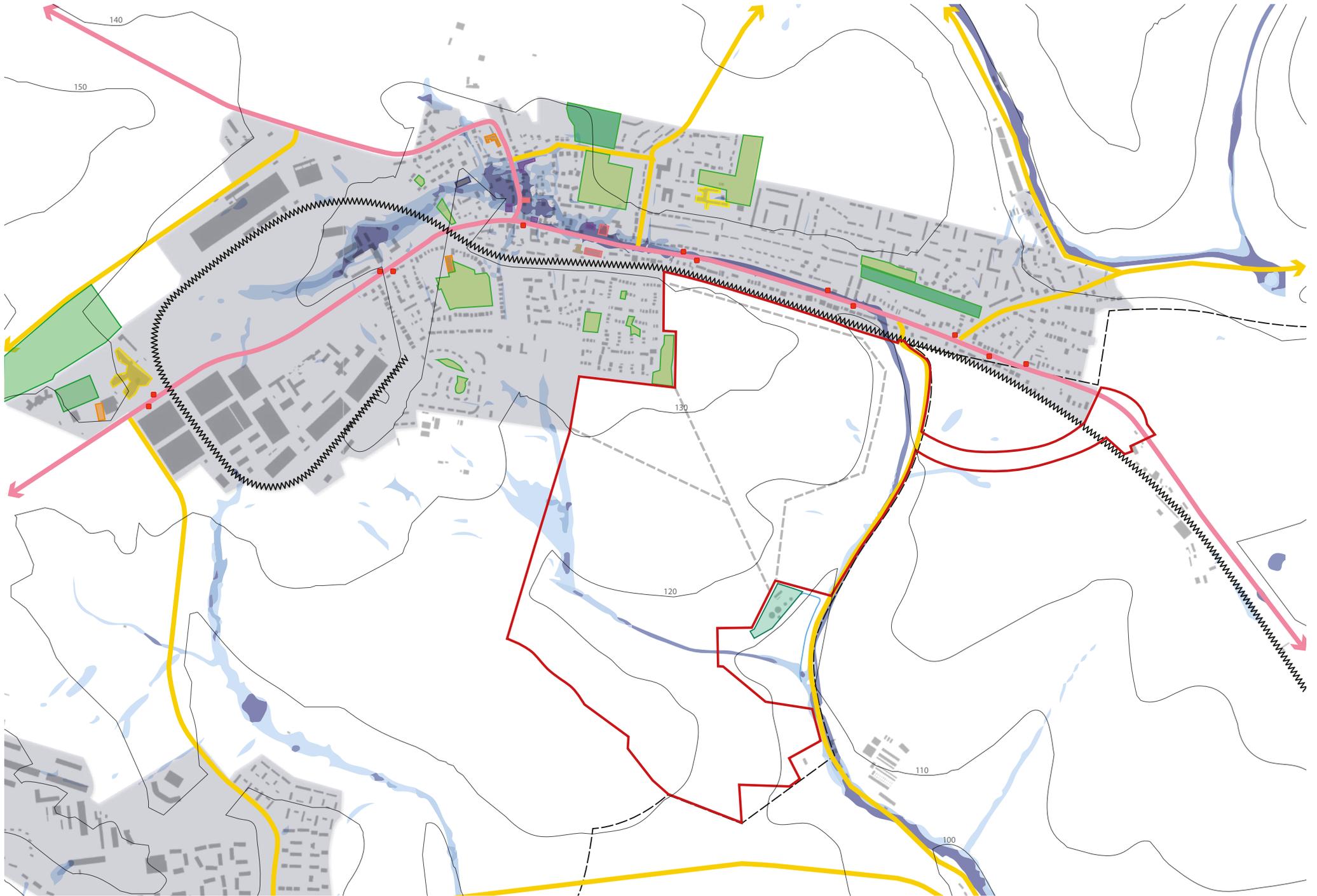


Fig. 13 - Infrastructure

ECOLOGY

EXISTING SITUATION

The land at South Park Garden Village is intensively managed farmland and, as a consequence, there is generally a low level of nature conservation interest across the site.

The site is not within or adjacent to any site of importance for nature conservation designated under either European or domestic legislation and there are no areas of particular significance for protected species within an expected zone of influence for the site.

Ludgershall is within the catchment area of the Salisbury Plain SPA, where additional visitor levels and recreational use of the SPA could increase pressure upon breeding Stone Curlew populations.

STUDIES UNDERTAKEN

- Extended Phase 1 Habitats Assessment (in part)
- Magic Map

SUMMARY

The site consists mainly of arable field, partially surrounded by hedgerows containing some trees. These boundary features are likely to contribute to primary connectivity within the wider landscape area and should be retained and protected within the development.

Rough grass margins of the existing habitats are likely to support slow worms and other reptiles, therefore some suitable areas should be incorporated into the site design that can continue to support these species. There is also scope to improve connectivity throughout the site and to connect different habitat areas off site.

Wessex Water and Southern Water will need to confirm there is headroom to accommodate the additional number of houses proposed for the site. The impact on water resource and water quality issues in relation to the Habitats Directive may need to be carried out.

There is no SSSI within 2km of the site, however it lies within the stone curlew impact zone. A contribution to the mitigation scheme for Stone curlew is thus required, if not being gathered through CIL. There are no Priority Habitats within the site.

DELIVERABILITY

The proposed development is expected to be able to mitigate for, and enhance biodiversity. The scheme will allow for any protected species present to be mitigated for appropriately as so that populations remain at favourable conservation status. This will be achieved through the design concept of the proposals by retaining and incorporating features which will be managed for wildlife gains. This includes aquatic and wetland habitats such as swales and ponds, green open space and well designed green infrastructure, connecting through the site and out to the surrounding habitats and landscape through hedgerow retention, new habitat creation, planting and grasslands.

Key	
	Site Boundary
	Built Area
	Main Road
	Secondary Road
	Railway
	Water
	Amenity Open Space
	Trees
	Hedgerows
	Broken Hedgerows
	Woodland
	Grassland
	Arable Land
	Woodpasture/Parkland
	MOD

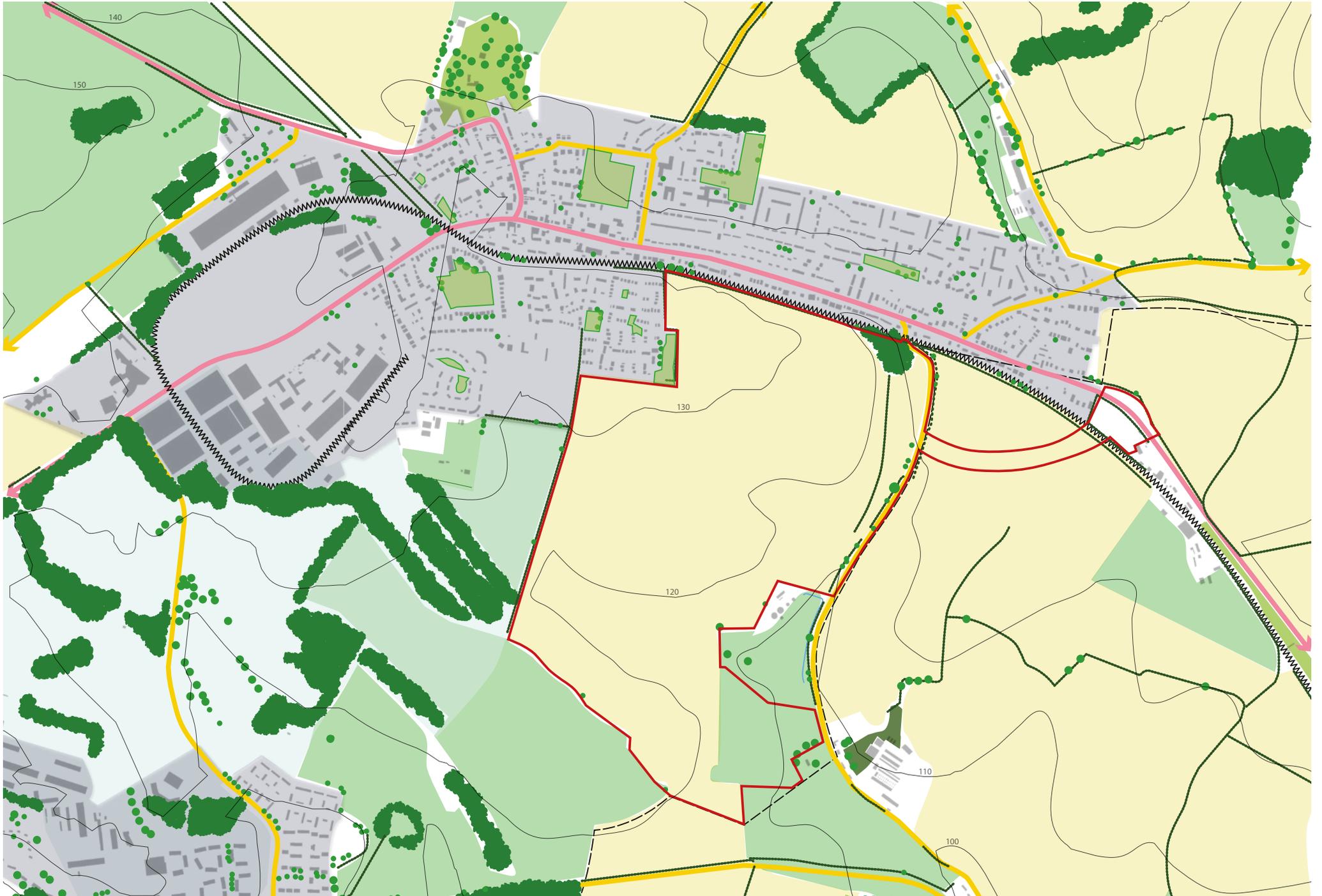


Fig. 14 - Ecology

SITE FEATURES SWOT

Further to the initial feasibility work carried out, the plan opposite provides the current overview of site features. These will need to be taken into consideration when developing the masterplan for the new neighbourhood.

The site is largely unconstrained owing to its current use as arable farmland. However, there are a limited number of natural and infrastructure features that will need to be included into the masterplan.

The landform gently undulates between 110 and 130 AOD with two distinct areas of higher ground. With the site being visible from mid and long distance views, particularly from the south, the key will be to integrate development on these areas of higher ground with the existing built form at Ludgershall. Key planting and woodland is therefore required to the south and east to establish strong landscape structure to accommodate new development on the fringes of urban areas.

Linear areas of surface water flood risk are located running parallel to Shoddesden Lane and through the southern portion of the site towards the WWTW. These areas will be safeguarded within the network of Green Infrastructure.

The presence of any below ground archaeological features is to be better understood as the feasibility process evolves, enabling any finds of national significant to be preserved within the extensive Green Infrastructure network as appropriate.

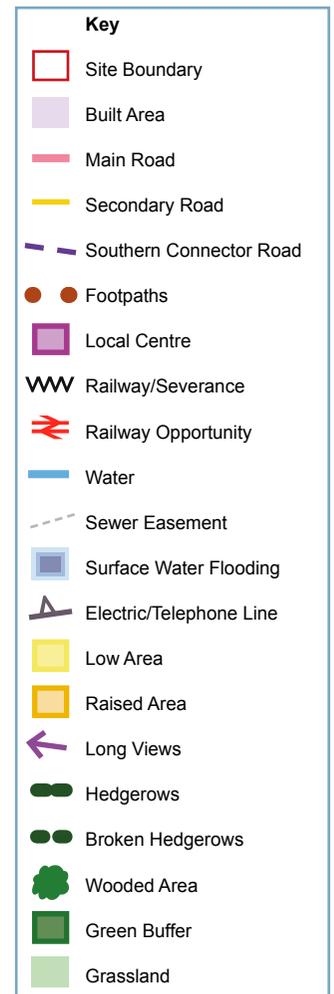
A Southern Connector Road (SCR) will be extended from the A342 adjacent to the existing lay-by at a new roundabout before crossing the railway line. The route of the SCR thereafter is aligned as close as possible to the southern side of the railway line to join Empress Way, while leaving sufficient space for the railway station and associated

infrastructure. A safeguarded route will also be provided to the southern edge of the development in order to facilitate a bypass of Ludgershall in the direction of Somme Road, should this be required at a future date.

The siting of the railway station dictates the location immediately adjacent to the railway line. As a focus for movement, the station will influence the location of a range of complementary uses.

Underground utilities dissect the site and therefore access to this existing network will be maintained with an appropriate easement. An appropriate buffer distance will be provided to the WWTW in respect of the siting of odour sensitive uses.

The recreational value of the public footpaths crossing the site will be taken into account in the scheme for their diversion with new footpaths and cycleways created to widen public access.



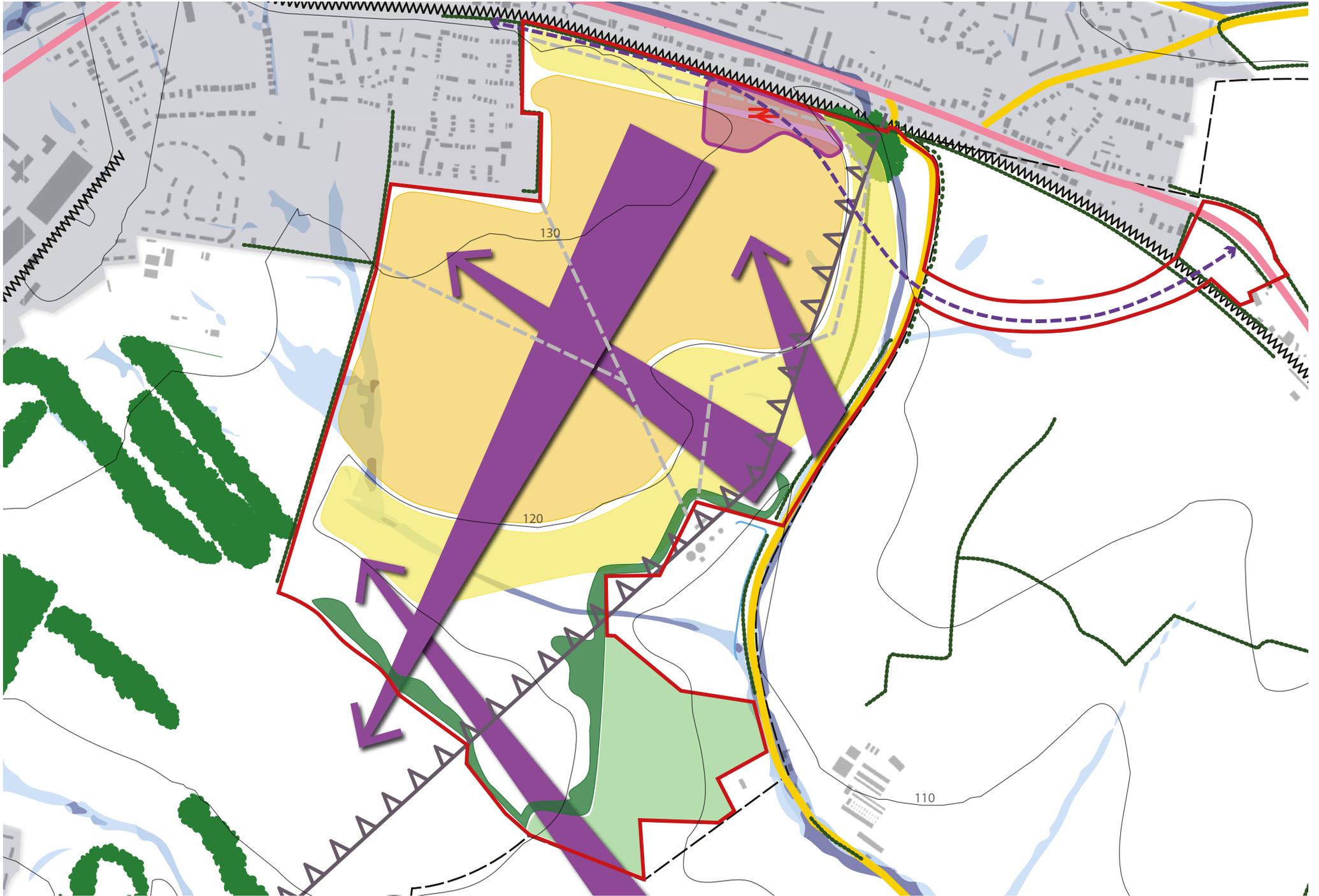


Fig. 15 - Site Features

KEY OBJECTIVES

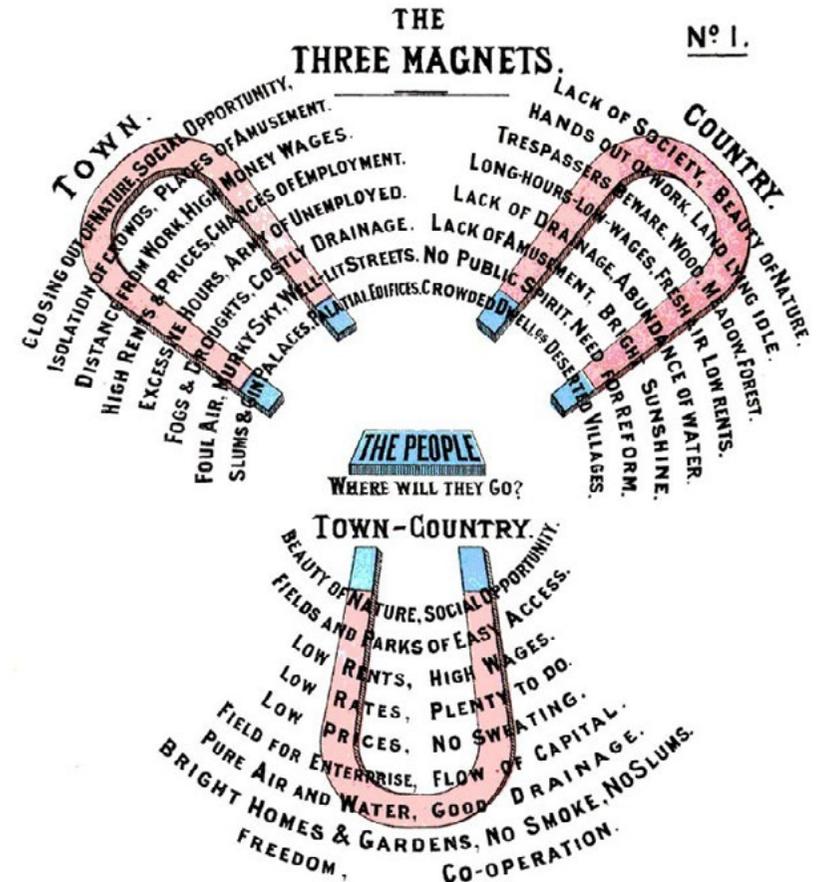
“The supply of new homes can sometimes be best achieved through planning for larger scale development, such as new settlements or extensions to existing villages and towns that follow the principles of Garden Cities. Working with the support of their communities, local planning authorities should consider whether such opportunities provide the best way of achieving sustainable development.”

- National Planning Policy Framework paragraph 52

The Vision for South Park is to create a 21st Century Garden Village for Ludgershall. This will be characterised by predominantly lower density family housing with front and rear gardens, on plot parking and generous spaces and streets.

The Garden Village concept set out for South Park, Ludgershall combines elements of the Garden City and Garden Suburb in that it:

- is a distinct community but linked with the existing Market Town with new transport infrastructure
- responds to its landscape setting
- provides a local centre with some commercial uses and good facilities
- contributes to the overall sustainability of activity and economy within the settlement





STRONG VISION, LEADERSHIP AND COMMUNITY ENGAGEMENT

- The promotion of this site will be led by the community who will be empowered to shape the design and delivery of the development in conjunction with key stakeholders.



LAND VALUE CAPTURE FOR THE BENEFIT OF THE COMMUNITY

- A development of the scale proposed would provide funding through Planning Obligations and the Community Infrastructure Level to support the delivery of necessary infrastructure.
- The opportunity to establish passenger rail services at Ludgershall will enable any uplift in values to be used appropriately to support the aspirations of the wider community.
- Scope for funds reinvested through the New Homes Bonus to be used in the locality on infrastructure projects.



COMMUNITY OWNERSHIP OF LAND AND LONG-TERM STEWARDSHIP OF ASSETS

- New public land throughout the development, including the relocated fire station, public open space, allotments and recreation facilities, will be provided for the benefit of and future ownership by the community. It is anticipated that the passenger train station could be under the stewardship of the Town Council working with Network Rail / operator.



MIXED-TENURE HOMES AND HOUSING TYPES THAT ARE AFFORDABLE FOR ORDINARY PEOPLE

- The scheme will deliver up to 1,700 high-quality affordable and open market homes that meets the housing needs and help support an inclusive and balanced community.
- Rented and affordable homes.
- First time buyer opportunities to help local people own a home.
- Family housing for growing households with an emphasis on 2, 3 and 4 bedroom properties.
- A wide choice of homes will include provision for suitable accessible and adaptable homes to meet the change needs of occupants, as well as retirement / extra care housing.



A STRONG LOCAL JOBS OFFER IN THE GARDEN CITY ITSELF, WITH A VARIETY OF EMPLOYMENT OPPORTUNITIES WITHIN EASY COMMUTING DISTANCE OF HOMES

- Opportunities for commercial space will be provided within the development that complements the range of employment floorspace, services and facilities within Ludgershall.
- Development would help to boost the uptake of local employment sites and the vitality of the town centre, while improving connectivity within the Andover HMA in recognition of the established commuting and migration movements between Ludgershall and Andover.



BEAUTIFULLY AND IMAGINATIVELY DESIGNED HOMES WITH GARDENS, COMBINING THE VERY BEST OF TOWN AND COUNTRY LIVING TO CREATE HEALTHY HOMES IN VIBRANT COMMUNITIES

- A range of site specific design principles will be created to deliver high quality and innovative buildings that features high sustainability standards. These are expected to reflect a contemporary interpretation of the early Garden Cities that used development blocks with substantial enclosed space for gardens, allotments and recreation; tree-lined streets, often with a section comprising road parking, tree-lined verge, footway, soft boundary treatment, front garden and home; and well-designed groups of homes within the street.



GENEROUS GREEN SPACE LINKED TO THE WIDER NATURAL ENVIRONMENT, INCLUDING A SURROUNDING BELT OF COUNTRYSIDE TO PREVENT SPRAWL, WELL CONNECTED AND BIODIVERSITY RICH PUBLIC PARKS, AND A MIX OF PUBLIC AND PRIVATE NETWORKS OF WELL MANAGED, HIGH-QUALITY GARDENS, TREE-LINED STREETS AND OPEN SPACES

- The development framework will be built around delivering a green and pleasant place that provides a vibrant strong sense of community and place.
- A range of open space networks extending to around 35 hectares will provide a variety of functions that will promote the health and well-being of the community.
- A net gain in biodiversity will arise within the network of connected Green Infrastructure.
- Woodland planting will help to enclose the settlement to accommodate the development into the wider landscape setting.
- Sustainable Drainage Systems (SuDS) will underpin the network of green spaces, assisting with sustainable water management and providing rich habitats for wildlife.



OPPORTUNITIES FOR RESIDENTS TO GROW THEIR OWN FOOD, INCLUDING GENEROUS ALLOTMENTS

- Generous gardens and allotments will provide opportunities for all future residents to grow their own food and promote the self-sustainability of the community.



STRONG LOCAL CULTURAL, RECREATIONAL AND SHOPPING FACILITIES IN WALKABLE NEIGHBOURHOODS

- The development will build onto and complement the existing range of local services and facilities at Ludgershall.
- Provision of a new primary school, healthcare, shopping and employment will reduce the need to travel and contribute to the self-sufficiency of the neighbourhood.
- This will include helping the community to develop an understanding of their needs in this area and how the development could accommodate these.



INTEGRATED AND ACCESSIBLE TRANSPORT SYSTEMS – WITH A SERIES OF SETTLEMENTS LINKED BY RAPID TRANSPORT PROVIDING A FULL RANGE OF EMPLOYMENT OPPORTUNITIES (AS SET OUT IN HOWARD’S VISION OF THE ‘SOCIAL CITY’)

- The promotion of a new passenger connection onto the national rail network by reopening a closed line accords with the Government’s objectives in the paper ‘Connecting People: A Strategic Vision for Rail’ to open routes to unlock housing and development.
- The station will serve Ludgershall and the wider community area and will offer greater sustainable connectivity between settlements to Andover and Hampshire in recognition of the established commuting and migration movements within the Andover HMA.
- The benefits of the railway connection have been warmly welcomed by both Ludgershall Town Council and Andover Town Council who recognise this new transportation link will greatly improve connectivity as well as encourage the uptake of employment opportunities in Ludgershall and attract new employers.
- Delivery of the Southern Connector Road to complete the missing link between Empress Way and the A342.
- Delivery of the cycle route on the A342 to Weyhill.
- Safeguarding of a southern bypass route.
- Personal travel planning to encourage take up of sustainable travel.

Chapter 4

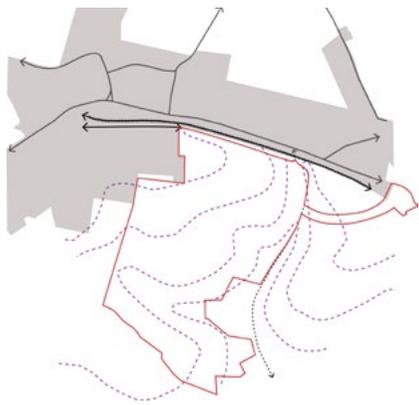
THE MASTERPLAN

This section of the document sets out the design principles as well as the masterplan for the site. It also highlights some of the key placemaking and economic benefits that South Park Garden Village could bring. If selected, this process will continue its engagement with the local community, other stakeholders and consultees.



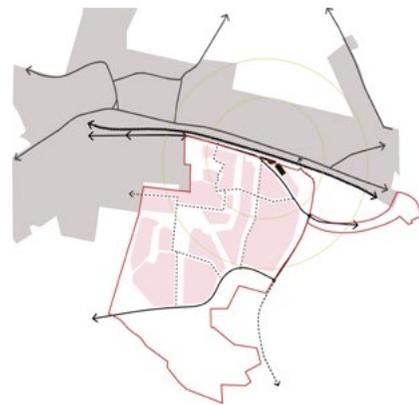


DESIGN PRINCIPLES



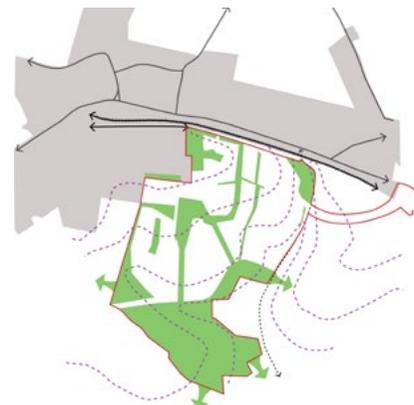
TOPOGRAPHY

The proposed development should respond carefully to the undulating contours across the site, with a focus for development on the higher ground associated with the existing built-up area of Ludgershall.



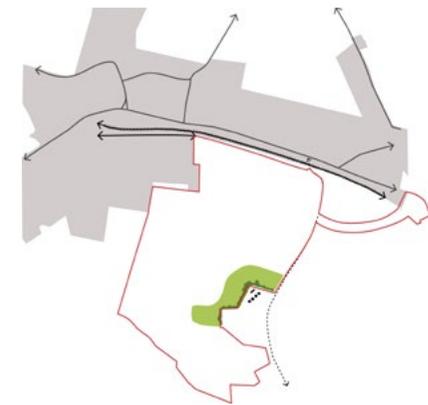
KEY INFRASTRUCTURE

The Southern Connector Road will improve road, pedestrian and cycle connectivity between Tidworth / Ludgershall and the A342. The proposed railway station is another major asset on the site providing an opportunity to focus movement and connect to existing infrastructure.



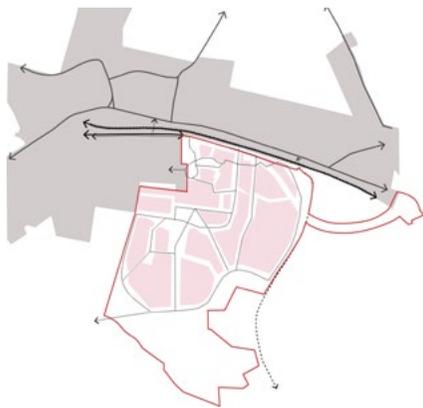
GREEN LINKS

Creation of green buffers will ensure that development can be accommodated within the wider landscape and define the urban edge. Key green routes through the proposed development will also be established to provide sufficient areas of open space for the wider community and establish linked ecological corridors.



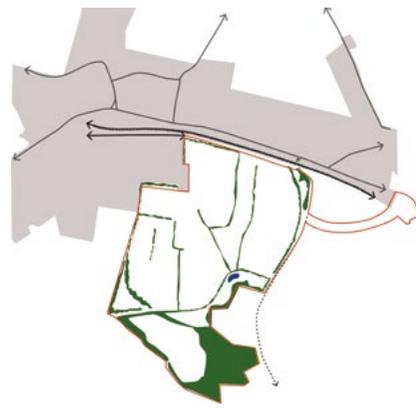
WWTW BUFFER

The proximity to the WWTW ensures that care will be taken in the siting of odour sensitive uses within an appropriate buffer zone of the neighbouring use.



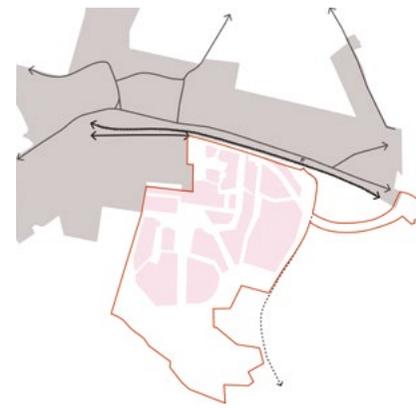
PEDESTRIAN LINKS

Public access to the site is limited to two public footpaths, where the recreational value of these routes will be maintained through retention of diversion proposals. Walking and cycling will be encouraged within the new neighbourhood and to the surrounding communities. Shoddesden Lane will be downgraded to a footway/cycleway between Andover and the Southern Connector Road.



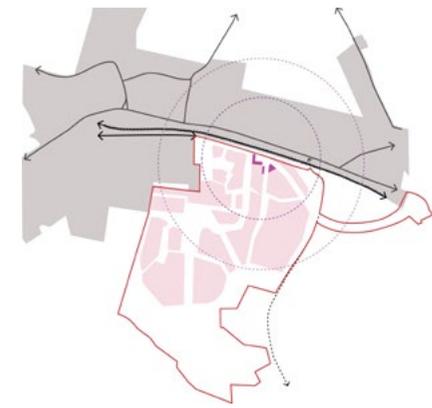
GREEN INFRASTRUCTURE

The landscape and biodiversity value of the site will be enhanced as the wide arable fields offer few features of importance. This new network will help to deliver a net gain in biodiversity through connected networks of natural and accessible greenspace.



DEVELOPMENT AREAS

The indicative development parcels are defined by the key constraints and strong design principles. These parcels offer opportunities to be developed in such a manner to form strong character areas, individually or in groups.



LOCAL CENTRE

A new local centre has been identified for the new neighbourhood. This has been designed so as to respond to the potential for increased movement at the railway station while creating a walkable neighbourhood.

INDICATIVE PLAN

The proposed masterplan provides an indicative approach as to how development could be implemented at South Park Garden Village. Over the course of the design process, feasibility studies, continuous engagement with key stakeholder groups and the public will ensure that a comprehensive masterplan is brought forward. At this visionary phase we have considered the following key uses that will help establish a strong community and a truly unique sense of place.



TRANSPORT IMPROVEMENTS

A new passenger rail service could be established along with the completion of the Southern Connector Route between Empress Way and the A342, improved bus, pedestrian and cycleway infrastructure. A safeguarded southern route will be provided for a future bypass.



STRONG DESIGN PRINCIPLES

Following the Garden Cities principles this would combine high quality, vernacular design, new green spaces, new planting and landscaping and the facilities needed by the community. It would enhance the environment and offer healthy lifestyles.



COMMUNITY FACILITIES

At the heart of the scheme will be a range of community services and facilities, such as retail, healthcare, halls, sporting provision that will benefit existing and future residents. Land will be provided to enable the existing Ludgershall Fire Station to relocate.



OLDER POPULATION

Land is to be provided for Class C2 use: specialist and extra care residential accommodation.



RAILWAY STATION

Land for a new passenger rail station can be delivered on the southern side of the line.



EDUCATION

A new two-form entry primary school will be provided as part of Phase 1 of the development, as well as investment into secondary provision and pre-school facilities.



GREEN INFRASTRUCTURE

The site will provide new, accessible natural green spaces for the existing and new community, including linear parks, landscaping, sports facilities and play areas.



NET GAIN IN BIODIVERSITY

A range of habitat opportunities will be enhanced and created including new woodland, tree and hedgerow planting, wetlands, ponds and swales.



FIRE STATION

Land for the relocation of the Ludgershall Fire Station can be provided adjacent to the Southern Connector Road.



GROWING FOOD

A wide range of opportunities for local food production including allotments and community orchards could be provided



HOMES FOR ALL

A wide choice of high quality homes will help local people to find their place on the housing ladder across a variety of tenures and delivery mechanisms.



HEALTH

Land for a new health facility is to be provided to serve the new and existing community.



Fig. 16 - Indicative Plan

CREATING A SENSE OF PLACE

The provision of sufficient new facilities is a fundamental component of the creation of the new neighbourhood with a range of local hubs to be created around key facilities, which the community will have the opportunity to take ownership and manage for their benefit.

PLACEMAKING-LED DESIGN

- The new neighbourhood will provide an extension to Ludgershall that will integrate with the existing Market Town physically and socially
- Design will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development
- A strong sense of place will be established, using streetscapes and buildings to create attractive and comfortable places to live, work and visit

TRANSPORT

- Land will be provided for a potential new rail station that will enable passenger services to be reinstated for Ludgershall
- Infrastructure funding towards the reestablishment of the rail services towards the railway station, signalling and track upgrading
- Delivery of the missing Southern Connector Road that will benefit the economic and environmental conditions in Ludgershall if through traffic were excluded from Butt Street, Castle Street and the High Street that would eliminate through traffic from the attractive townscape, which form part of the designated Conservation Area
- New safe and convenient walking and cycling routes to existing and proposed facilities and access to the countryside

OPEN SPACE

- New accessible natural greenspace will substantially increase provision that currently exists in the Salisbury Plain SPA reducing recreational pressure
- Open land will perform many functions for use for wildlife, recreation, flood risk mitigation, carbon storage, or food production as part of the Green Infrastructure

LOCAL CENTRE

- A community hub could provide local shopping opportunities, a public house, café as well as seating, parking and a village green, so that the community can come together and socialise
- An opportunity exists to locate the local centre in close proximity to the railway station that will complement each other's viability

EDUCATION

- The two-form entry primary school land is to be delivered in Phase 1 so that it is readily available to meet the growing demands for school places
- A collaborative approach with the local education authority to promote exemplar design in consultation with the community that will create an inspiring environment for teaching and learning
- Land can be provided to meet the needs for increase demand for nursery places

HEALTH AND CARE

- A health centre could be provided which could provide local GP services as well as space for a dentist and other facilities as required
- Land will be provided to meet the needs of the growing elderly population with retirement and extra-care accommodation integrated as part of the development



DELIVERABILITY

The Framework requires local planning authorities to boost significantly the supply of housing, including by identifying a supply of specific deliverable housing sites, as well as identifying a supply of specific developable sites or broad locations for growth.

When considering the deliverability of the development it is important to consider whether a site is available now, offers a suitable location for development now and is achievable through its viability.

AVAILABILITY

The land which will form South Park Garden Village is primarily agricultural land, which is owned by [REDACTED]. A parcel of land adjacent to Soddesden Lane is within the ownership of Wiltshire Council. The Southern Connector Road will be constructed on land within Hampshire that is either owned by, or an interest in by [REDACTED]. Other land at the A342 layby is within the publically maintained highway and the railway crossing falls under the auspices of Network Rail who have raised no objections to the overbridge subject to technical requirements being met. There are considered to be no significant land assembly issues that would preclude the development.

SUITABLE

This Vision Statement has demonstrated that South Park Garden Village is a suitable and sustainable location for development now and in the future. The suitability of the site has been recognised by the grant of planning permission E/2013/0234/OUT and the proposed allocation for 270 homes etc in the Site Allocations DPD. These confirm the site represents a logical extension to the built-up area of Ludgershall where development can come forward in the short term in a sustainable matter utilising the existing highways infrastructure. Beyond this first phase new highway links are required through the Southern Connector Road to facilitate additional growth. This road as well as new infrastructure and facilities will provide substantial benefits for existing and future residents of the community.

VIABLE

As recognised in paragraph 52 of the Framework, the supply of new homes can sometimes be best achieved through planning for larger scale developments, such as new settlements or extensions to existing villages and towns that follow the Garden Cities principles. The key advantage of the South Park Garden Village scheme is that it benefits from being able to deliver some development using existing infrastructure in Phase 1, but also the large scale nature of the proposal makes funding the new infrastructure required viable. As a result a minimum residential phase of 500-800 homes is required in Phase 2 in order to fund the delivery of the Southern Connector Road which is a critical piece of missing highways infrastructure. Land for the railway station can be made immediately available and additional funding is available from later phases towards the rail infrastructure.

Whilst significant infrastructure is required, the technical work undertaken to date demonstrates that there are no show stoppers that would compromise viability. In this context and having regard to guidance in the NPPF, it is clear that this new neighbourhood for Ludgershall will be a deliverable allocation.

Key	
	Site Boundary
	Phase 1
	Phase 2
	Phase 3



Fig. 17 - Indicative Phases

ECONOMICS

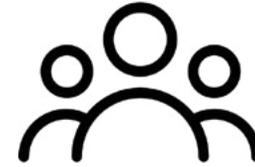
Framework Paragraph 21 states:

“...Planning policies should recognise and seek to address potential barriers to investment, including a poor environment or any lack of infrastructure, services or housing.”



LOCAL ECONOMIC STRATEGY

4,000 persons will help to readdress the imbalance between military and civilian populations. A more balance community will act as a catalyst to attract inward investment with new employment opportunities complimenting those of the MoD.



INFRASTRUCTURE

£4.4 million investment in the construction of the Southern Connector Road with additional spending towards rail infrastructure.



CONSTRUCTION

£100millions in construction investment



EMPLOYMENT

100s direct and indirect new jobs within various sectors
100s direct and indirect jobs during the construction phases

HOUSEHOLD SPENDING

£8.5 million one-off spend from new residents through first occupation expenditure making their house their home.

Receipts per annum to Wiltshire Council in Council Tax with additional business rate receipts.



£14.7 million in New Homes Bonus payments to Wiltshire Council.



COMMUNITY BENEFITS

35 hectares of new accessible and natural public open space supporting the health and wellbeing of the community.



1 new primary school

5 hectares of land for the Railway Station, Local Centre, Healthcare, Community Facilities and Fire Station.



Chapter 5

NEXT STEPS

The masterplanning carried out to date is just a start and we would seek to work closely with key stakeholders and the wider community to create a wonderful, new, sustainable place for the future residents of the area and a place to be proud of. This final section identifies the next steps that we will undertake to help achieve this.





Fowlers have been instructed by [REDACTED] to finalise the project team that will enable this indicative masterplan to be developed as part of the following strategy:

ONGOING SITE ANALYSIS AND DIALOGUE WITH KEY CONSULTEES

The initial technical work to date has been comprehensive and sufficient to confirm the suitability and deliverability of the site. Moving forwards, the assembled project team will undertake further detailed analysis, working with key consultees and stakeholders, to inform further iterations of the masterplan.

WORK WITH WILTSHIRE COUNCIL AND NEIGHBOURING AUTHORITIES

Technical and feasibility will be shared with Wiltshire Council, Test Valley Borough Council and Hampshire County Council to enable an informed consideration of the proposals for consideration as part of the emerging development plans. As the emerging Local Plan develops Fowlers will work closely with local authorities to ensure the proposals are a sound component.

DELIVERING THE RAIL INFRASTRUCTURE

The estimate of costs for the three options to reinstate passenger rail services at Ludgershall varies from around £4 million to £12.2 million. Further development of the options involves other stakeholders i.e. Local Economic Partnership, Network Rail, Train Operating Companies and the MoD to be led by a rail specialist consultancy.



COMMUNITY INVOLVEMENT

The community will be fully engaged with the masterplanning process for South Park Garden Village. This will allow local residents to have a pivotal role in shaping the development and the long-term management of community assets, including the railway station. Fowlers will be preparing a community engagement strategy and a series of public consultation events organised in 2018 to publish the vision and develop a greater understanding of the community aspirations for the new neighbourhood.



FOWLER ARCHITECTURE
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RIBA 
Chartered Practice

 **RTPI**
Chartered Town Planners

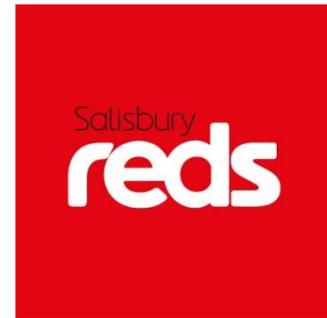
**URBAN
DESIGN
GROUP** REGISTERED
PRACTICE



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T&L18



Consultation Response

Wiltshire Local Plan Review
Consultation Draft
March 2021

1.0 Introduction

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



Figure 1: Go South Coast Operating Area

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

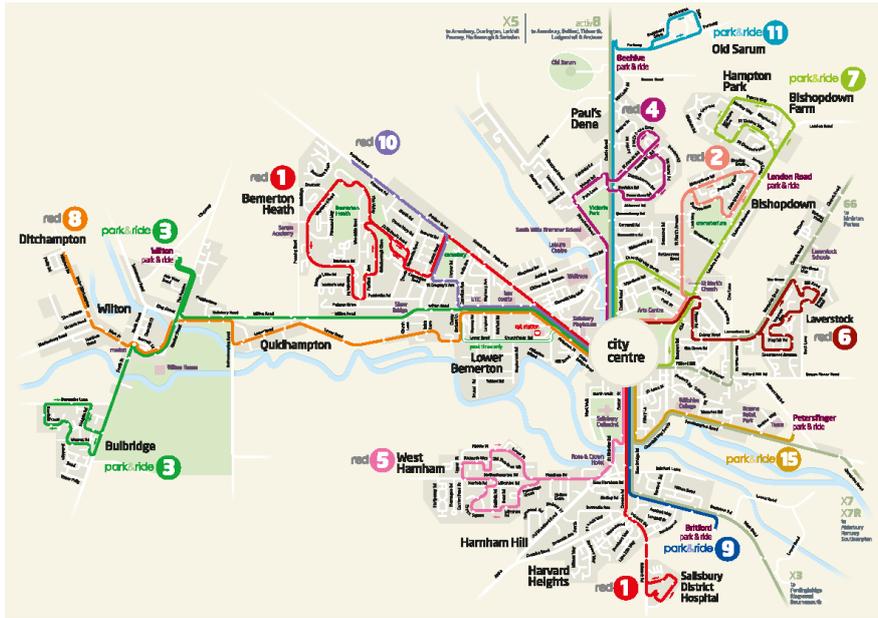


Figure 2 – Salisbury Reds City Network

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

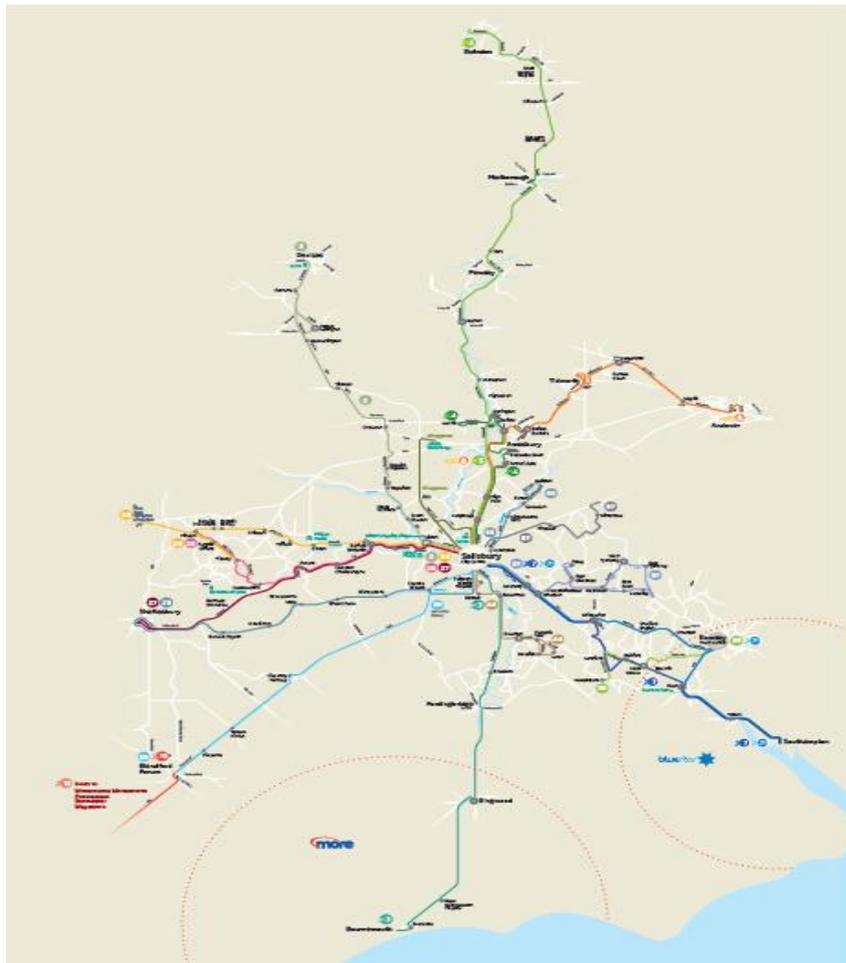


Figure 3: Salisbury Reds Country Network

2.0 Why we're Responding

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

3.0 Our Response

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

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

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

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

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

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

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

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

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

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

5.0 Reversing the Decline of County Buses

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

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

6.0 Better Located Development

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

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

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

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

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

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

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

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

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

7.0 The Need for Bus Infrastructure as Part of New Development

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

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

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

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

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

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

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

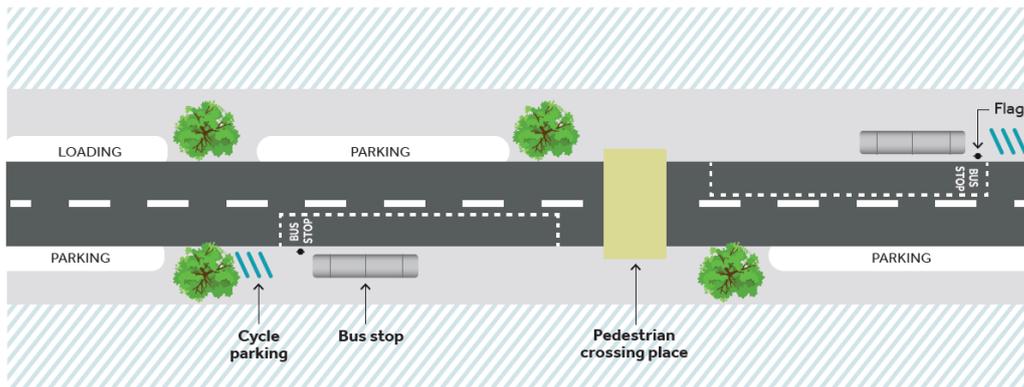


Figure 5 – Example of Bus Stop Layout (Source CIHT Buses in Urban Developments, 2018)

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

8.0 Overall Plan Strategy & Transport Evidence Base

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

9.0 Housing Selections

Salisbury

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

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

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

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

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

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

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

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

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

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

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

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

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

Transport Key Features, Constraints and Bus Service Reliability

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

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

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

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

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

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

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

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

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

Site 1: North East of Old Sarum

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

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

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

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

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

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

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

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

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

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

Amesbury

AM3: Pool of Development Sites & Additional Sites for Consideration

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Tidworth & Ludgershall

TL5: Pool of Development sites

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

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

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

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

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

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

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

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

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

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

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

Marlborough

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

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

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

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

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

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

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

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

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

Head of Strategic Development
Go South Coast
March 2021

T&L19a

Comments by Wiltshire Ramblers on Wiltshire Local Plan consultation document

Wiltshire Ramblers are very disappointed that there is not one mention, as far as we can see, of Public Rights of Way (ProW) in any of the constituent documents comprising the consultation document.

The paragraph in the succinctly named ‘**Addressing Climate Change and Biodiversity Net Gain through the Local Plan - raising the ambition**’ paper in which we would have expected PRowS to be considered is 4.6. In this paragraph five themes are identified for closer investigation and evidence gathering, and theme 5, ‘Promoting sustainable transport, active travel and air quality’ is the relevant one. This gives rise to Consultation Question B13, ‘What practical policy steps should the Local Plan take to significantly increase modal shift to public and active transport, and speed up the transition to greener fuelled vehicles?’

The Wiltshire Core Strategy (which it appears is to be superseded by the Local Plan) envisaged supporting improvements to the PRow network, but was vague about how this should be done. There has been a great deal of publicity over recent months about encouraging ‘Active Travel’, that is walking and cycling locally rather than going by car. This is envisaged to lead to substantial reductions in carbon emissions. However this will not be achieved without a significant amount of investment, especially if it is intended to see results by 2030, which is only nine years away. This will need to be done by optimising car free routes between towns and villages, and integrating these with public transport.

Wiltshire’s vast network of PRowS – there are nearly 4,000 miles of these – invites many possible choices for Active Travel routes, but there are enormous obstacles to be overcome:

- 1) Wiltshire’s PRowS are a legacy of the 1940s and 1950s, so any of them identified as being appropriate for Active Travel routes are likely to need rationalisation and upgrading to make them attractive enough to persuade car drivers that they can be used as an alternative

- 2) The choice of routes to be nominated for Active Travel will entail local research and consultation, through Parish Councils and interest groups
- 3) There will inevitably be objections and legal challenges from local residents and landowners to overcome
- 4) The health and climate emergency gains of Active Travel will require a great deal of ongoing publicity and campaigns to retain support
- 5) Routes should be compatible with local bus services, and their providers' coordinated publicity sought

There are obvious difficulties in implementing this programme, the most pressing of which is that the present Countryside and Rights of Way department has the expertise but is woefully short of staff that could supervise it. The department has suffered from almost continuous cuts to its budget since the austerity programme began in 2010, and appears to be the last in a long line of Council departments when considering its relative importance and need for additional funding. There are at present only 6 Countryside Access Officers to attempt to deal with the very high volume of path problems being reported by the walking public - some 1400 since September last year, we understand, not to mention the number of path problems accumulated up to then.

Although it is our experience that the Countryside Access Officers do an outstanding job given the meagre resources at their disposal, this staffing level is clearly hopelessly inadequate. An early reassessment of the department's staff requirements should be made to enable it to support Active Travel in a meaningful way so as to produce tangible results by 2030. If this is done it will also take the department a long way towards being able to fully address the key issues set out in paragraph 8.2 of the Council's Countryside Access Improvement Plan 2015-2025.

The health benefits of walking are well known and have been proven by many studies; the need for the public to be able to use PRoWs safely has been highlighted by the covid-19 pandemic, and yet their continued existence seems to be taken for granted. But unless steps are taken to restore the network at least to the condition it was in before the austerity campaign began, many PRoWs will deteriorate to the point that they will become unusable, and indeed this has already happened to far too many of them.

The Slow Ways project, which we enthusiastically support, seeks to get the public out walking on the PRowS which connect local communities together. This is just the kind of initiative which should greatly reduce the number of car journeys taken, and thus contribute significantly to achieving the objectives of the Council's Climate Change plan, but it will also put vastly increased pressure on our PRowS, and may even lead to accidents unless something is done urgently to address the lamentable deficiencies in or network of PRowS.

We note that there is no mention of PRowS in CP (Council Policy, presumably?) 52 in Appendix 1. This "seeks to maximise the retention and enhancement of Wiltshire's green infrastructure"; what could be greener than its extensive network of PRowS? CP 53 "seeks to safeguard the historic routes of Wiltshire's canal network with a view to its long-term re-establishment as navigable routes". Whilst this is indeed a laudable objective, this network is a microcosm of the RoW one, which seems to have somehow avoided any mention in the Plan. CP63 is that "Packages of integrated transport measures will be identified in Chippenham, Trowbridge and Salisbury", with the first of these to "consider the implementation of...new and improved networks of routes for pedestrians and cyclists". This is all well and good, but how about considering the thousands of miles of such networks outside these towns?

The Plan's **Emerging Spatial Strategy's** side document is its **Empowering Rural Communities** paper, and both are supported by the **Transport Review** undertaken by Atkins. We have no specific comments to make on these papers, other than to request that developers should be required to pay due care and attention to PRowS affected by their plans, rather than treating them as an irritating distraction to be considered only as an afterthought. Ideally, of course, they should be required not only to retain PRowS but to improve them if at all impossible, and to ensure that they continue to connect with the rest of the PRow network. Paragraphs 59 to 69 of the **Empowering Rural Communities** paper deals with Neighbourhood Plans. We believe that these should be required to consider how to maintain and enhance the PRowS within their jurisdiction.

Paragraph 3.2 of the **Transport Review** discusses the 'Walking and Cycling mitigation measures' to be adopted in the three largest communities of Chippenham, Trowbridge and Salisbury, however walking as a stand alone

activity is not mentioned at all. The intention seems to be that walkers will share the urban, tarmac cycling routes with cyclists, but this has safety implications. As a minimum, there need to be clearly marked lanes for cyclists and pedestrians to use, with both being wide enough (at least 1.5 m) to lessen the risk of collisions. Furthermore we think that it should be a requirement for the local authority to erect signs along such routes reminding cyclists to ring their bells or alert walkers to their approach, which should reduce the likelihood of accidents occurring.

We note that the creation of cycle tracks in urban areas can cost several million pounds, and wonder why some of this funding could not be spent on maintaining and improving the county's PRowS instead?

Appendix D1 of this review consists of a plan of the proposed Melksham bypass. The Ramblers were consulted recently by a Transport Planner working in a team delivering 'GG142 Walking, cycling and horse-riding assessment' of the bypass plan, and our comments are attached as an appendix to this response. We are anxious that these are fully considered well before the scheme is finalised. We strongly recommend that the Plan should make it clear that major transport infrastructure schemes should not allow major highways and railways to divide communities unless suitable crossing points are provided to retain the coherence and unity of local communities.

Finally we set out below our comments on the individual **Planning for...** papers for some of the principal towns in Wiltshire. Please note that the absence of comment on the housing site proposals for some of the towns should not be taken as implying that we necessarily agree with them.

Our comments relate to the sites which have been designated as potentially suitable for housing development during the Plan period. We are not commenting on the other aspects of the Plan.

Planning for Marlborough

Site 1. No objection.

Site 2. No objection provided the higher ground is retained as open space, as is the case with the existing Salisbury Road development which it adjoins.

Sites 3 & 4. With the exception of that part of Site 3 which is included in the Marlborough Neighbourhood Plan we do not consider these sites suitable for development and therefore object to their inclusion. There would be an adverse impact on the whole of bridleway PRES32 as well as parts of MARL1 and PRES27 (the White Horse Trail). PRES32 affords good views across the valley to Granham Hill. The sites' elevation means that housing development would be a prominent and unattractive feature in views from south of the A4, looking north towards the downs.

Planning for Royal Wootton Bassett

Site 3 – Maple Drive. With the exception of the square field immediately north of the school playing fields (SHELAA 3160), on which development may be acceptable, we object to the inclusion of this site. It is unsuitable for development by reason of its proximity to Jubilee Lake and the surrounding woodland. Footpath WBAS108, which runs down the western boundary and gives excellent views to the west from its elevated position, has a strong rural feel and one section is notable for its variety of wild flowers in summer.

Site 4 – Whitehill Lane. No objection provided the northern part of the site is reserved for a town park as set out in the Royal Wootton Bassett Neighbourhood Plan.

Sites 5 & 7 – South of RWB. We object to the inclusion of these two sites. The Wilts & Berks Canal when fully restored should continue to run through the countryside as it always did and should not become an urban waterway. The inclusion in Site 5 of land west of Breach Lane, which is at a higher level, would also have an adverse impact on the countryside.

Another important consideration is that, to be sustainable, any housing development south of the railway would need additional pedestrian and cycle routes to be created across the line. The electrification of the line has made the construction of new bridges more difficult. As an example of this we understand that Network Rail wish to close the surface crossing on footpath WBAS28 and have said that the gantries prevent a footbridge being put in here. We believe there is a strong case for treating the railway line as the southern boundary of the town's development area, with the exception of sites immediately adjoining Marlborough Road.

We have no objection to the remaining sites.

Planning for Tidworth and Ludgershall

The documents state that, of 1555 additional homes assessed as being needed in these two towns in the period up to 2036, only 165 require new land to be identified. Since this number is so small we do not understand why so many sites have been included.

Site 1. The northern edge of this site touches the boundary of the AONB. The ground levels are also higher than the developed area of the town to the south. We therefore believe that any development should be restricted to the southern part of the site.

Site 4. Given the relatively small number to new homes to be accommodated, as referred to above, we see no justification for including a site which covers such a large area of countryside. Any development on this site should be restricted to the north-east corner of the site, close to the A342. Development of the rest of the site would be disproportionate to the size of Ludgershall and would deprive many residents of easy access to countryside walking.

Site 5. No objection subject to the woodland being retained.

We have no objection to any of the other sites.

Planning for Salisbury

We have no specific comments on the plan, but note that the overriding impression given by it is the lack of emphasis on improvements in greener travel infrastructure, and any obvious plan to manage the inevitable increase in traffic, which is barely alluded to.

Whilst there is some evidence of thought given to pedestrian access in proposed new developments, there is no overriding guiding principle of improving the quantity and quality of footpath and cycle routes to comprise an enhanced network across the city.

Planning for North West Wiltshire

North West Wiltshire has been divided up by major roads – notably the M4, A350, A429, A420, A4 and the new north Chippenham spine road. With the proposed future Chippenham routes traffic will only increase.

The effect of the major roads is to restrict the ability to walk north to south and east to west, reducing many footpaths and bridleways to dead ends. Many of these are now obstructed, overgrown and unsigned. Parts of these major roads have no footway which prevents them being used to walk between settlements or to join up with the PRow network.

With further ‘improvements’ to trunk roads the situation can only deteriorate further. There are many large roundabouts on these routes which present significant barriers to pedestrians, cyclists and equestrians.

A429 – there is only one pedestrian refuge (at Lower Stanton St Quintin) between the M4 and Malmesbury – in 8km of road. There are only short sections of pavement, usually within settlements, so it is often impossible to walk from one to the next (as there are ditches on either side of the road).

A350 – there are pedestrian crossings only at Lacock, Frogwell (Chippenham Rugby Club), Malmesbury Road and Plough Lane – that is four safe crossings in over 12km of road. The road often has wide verges but they are mainly too rough to walk along.

A420 – there are no safe crossing points between the county boundary and the Hathaway medical centre, a distance of 11.2km. Again the road often has wide verges but they get overgrown in summer and as a result become impassable.

A4 – there is no footway between Corsham and Chippenham, a distance of 2.3km. On the Pewsham Way bypass, the pedestrian refuges do not align with the rights of way; between Stanley Lane (access to Abbeywood School) and the new pedestrian crossing at Derry Hill, there are no safe crossing points, a distance of 3.3km. There is a footway between Pewsham and Derry Hill and on to Calne, but it changes from one side of the road to the other at Chilvester Hill with no safe crossing, and there is a missing section between Greenacres Way and Springfields Academy, a distance of 170m). There is a footway along most of the A4 from Calne to Beckington, except for a 730m section north of the White Horse plantation. The footway from BANES County boundary into Box is missing a 0.5km section through Box Hill. It then resumes to Corsham.

The first section of the North Chippenham Spine road crosses three footpaths, and it was only through campaigning that one pedestrian refuge was created on the route.

The M4 is crossed or underpassed by 12 roads, 6 bridleways, 2 footpaths and 1 track. It truncates 4 bridleways, 7 footpaths and 1 cycleway. Some footpaths have been rerouted to other crossings, leading to 3 diversions of over a kilometre, and one of 2 km.

T&L19b

Appendix to Wiltshire Ramblers comments on Wiltshire Local Plan

General requirements

1. All current Rights of Way (RoW)s – which are numerous - to be maintained [see detail below]
2. Crossing points to have adequate bridge or underpass
3. Underpasses to have adequate drainage as land generally low lying
4. All non-vehicular routes to be tarmac where possible to protect against erosion from usage
5. Wilts & Berks Canal towpaths – actual and likely - to be linked in where possible
6. A new RoW adjacent to the bypass would be useful in linking routes N to S
7. Option 10d would be too environmentally damaging and make little sense in terms of work involved
8. RoWs to be of adequate width to allow for multipurpose use – cyclists, horse-riders and walkers
9. Stiles to be eliminated and replaced with kissing gates to allow for wider community use – this will have a positive impact on health

Specific requirements

1. Travelling from N to S, these are the RoWs crossed, which are all footpaths except where otherwise mentioned –

MELW 66, 61, 47, 26, 4 [Bridleway], 22, 23, 24, 35,

SEEN18, 13 [Bridleway], 17 [Bridleway]

MELW 42. See

<https://wiltscouncil.maps.arcgis.com/apps/webappviewer/index.html?id=43d5a86a545046b2b59fd7dd49d89d22>

for where exactly these RoWs are.

2. Footpath improvement – probably additional – from Melksham Oak school to the new estates on the east side of Melksham thereby diverting more pupils away from the unhealthy aspects of the Melksham – Devizes A365 main road
3. Traffic calming on Lower Woodrow [SE of Queenfield Farm] would be a good idea as it is a horsey area
4. A RoW link between footpath MELW26 and Bridleway MELW40 would be a good idea to enable safer circular walking
5. A linking RoW alongside the new road bridge from north of Beanacre would be a very useful W-E link in the north

Observations

1. Somewhere in the blurb on one of the options it mentions about 1 bridge being required. This is not correct. There are at least 3 – being the crossing of the line of the Wilts & Berks Canal – probably just to the south of Queenfield Farm. The canal is being restored. Then Clackers Brook to the east
2. There is likely to be a wiggle in the bypass at Sandridge to pass between two sets of main farm buildings – Blackmore and Manor. To go east Manor Farm would involve going over higher ground and much earth relocation as well as slicing through a solar farm
3. Suggest further dialogue with Melksham Without PC

T&L20



Network Rail
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NW1 2DN
T [REDACTED]
E [REDACTED]

09 March 2021

Dear Wiltshire Council,

Re. Wiltshire Local Plan Review

Network Rail welcomes the opportunity to comment on this important consultation and would like to be kept informed on any future updated on the Local Plan.

Level Crossing Comments

As part of Network Rail's license to operate and manage Britain's railway infrastructure, Network Rail have the legal duty to protect rail passengers, the public, the railway workforce, and to reduce risk at our level crossings so far as is reasonably practicable.

The proposed sites around Tidworth and Ludgershall will impact on several public and private rights of way over the railway line in that area. Therefore, we believe that any future developments take into consideration the impact on use of these crossings and any resulting increase in risk. This clearly will require early consultation between the planning authority, developers and NR to identify ways that any increase in risk can be mitigated.

Transport Review January 2021 prepared by Atkins Comments

Introduction

This sets out the methodology. The key tool appears to be the Wiltshire Transport Model which in practice appears to be aimed at traffic modelling. Most local authorities have access to similar modelling techniques. It is stated that this has been updated to a 2018 base and is pre-COVID. It is far from clear how public transport modes are accounted for in this model.

Section 2 Assessing Impacts of Local Plan Growth

Section 2 provides some interesting maps showing the forecast impact of the proposed new housing on the road network and some road schemes to alleviate the impact of this growth. ***There were proposals for new stations (developer funded) at Corsham, Royal Wootton Bassett and Grove and Wantage (where there was the likelihood of significant housing development) to deter residents of those communities driving to Swindon or Didcot Parkway to access the rail network. This does not seem to be referred to here.***

Section 3 Mitigating Impacts of Local Plan Growth

There is talk in 3.2.1 of improved walking and cycling provision to the railway stations in Chippenham, Trowbridge and Salisbury with maps showing additional cycle lane provision and other infrastructure. There is some mention of additional facilities that should be provided at the railway stations including the creation of hubs.

3.3 Public Transport Mitigation Measures

3.3.1 sets out principles mainly to do with buses. *These do not appear to be very ambitious, particularly given the success pre-COVID of bus services in cathedral cities elsewhere in the UK such as York, Oxford and Cambridge, and this is surprising particularly in the case of Salisbury. There is no mention of Quality Bus Partnerships, merely commercial bus services, nor of what the local authority is proposing to do to enhance commercial bus service provision, namely bus priority measures and charging for car parking to make bus more competitive.*

3.3.2 Rail Strategy

This starts by reiterating the concentration of development at Chippenham, Trowbridge and Salisbury, then has *a rather peculiar comparison of rail services and usage for Chippenham, Trowbridge and Melksham (but not Salisbury!)*. It seems perfectly reasonable to expect that there will be better rail services and greater usage at Chippenham given it is on the main line between Bristol and London Paddington with a number of key destinations en route, for example, Bath Spa, Swindon, Didcot Parkway, and Reading, as opposed to less frequent services from Trowbridge and Melksham (including none to London), hence rail usage is likely to be lower from those stations. *In the case of Trowbridge, there may well be more employment available locally given the Council offices there, hence there is less requirement to commute elsewhere.*

No mention is made of any aspiration for new or re-opened stations in Wiltshire to alleviate commuting by car to stations outside the county such as Didcot Parkway.

The potential role of rail in helping to support sustainable housing growth in Wiltshire is dramatically understated in this review. No reference is made to the work led at Sub-national Transport Body level, including the Western Gateway Rail Strategy and Strategic north-south corridor development. Equally there is no reference to the developing Wiltshire rail strategy that is being supported by Network Rail, Great Western Railway and South Western Railway. Rail industry led work, specifically the strategic study for the West of England line is disregarded, this being particularly relevant for Salisbury.

Properly aligned planning amongst industry stakeholder groups can ensure that rail plays a crucial role in supporting growth. It is key that recommendations within this review should align with the relevant strategic approach including, that being led by the STB in partnership with rail stakeholders.

Further, new development should be concentrated and consolidated at or close to existing and proposed rail infrastructure and hubs. Opportunities such as the TransWilts rail strategy and the potential new station at Devizes Gateway are not mentioned in the review but could and should play a major role in supporting growth. There is no assessment of the potential impact that these enhancements could have, by helping to identify where sustainable investment should be focused.

The role of rail deserves substantial amplification in this review, to help ensure that opportunities to deliver sustainable development are not missed.

3.3.3 Bus Strategy

Please see earlier comments regarding partnership working, bus priority measures and car parking pricing. The omission of targets for frequency or accessibility (for example, developments to be designed so all households are within 400 metres of a bus stop with a frequency of x buses per hour) may hinder securing developer funding.

3.3.4 Mitigation Recommendations

There is an extremely bold assertion about the reliability of bus services in Chippenham which begs the question *what is the local authority doing to assist the bus operators, for example by providing bus priority measures, and increasing parking charges?*

The Demand Responsive Transport suggestion may be of marginal benefit, *but is really the public transport of last resort if bus services can no longer be funded or provided commercially. It is not a panacea for congestion or modal shift.* This is discussed in 3.3.5. *There may be some best practice experience that would assist with this based on pre-COVID schemes in other areas of the country (Oxford and Ashford?).*

4.2 Proposed Mitigation

4.2.2 Public Transport

A figure of £10.5m is quoted for public transport measures. *This appears to conflate both capital costs (new bus shelters and real time information), and revenue costs. It is to be hoped that there will be revenue funding not just for improved bus services but also for bus stop information, bus shelter cleaning and repairs on an on-going basis. In addition, consideration should be given to telemarketing providing targeted public transport marketing material to residents of new housing, encouraging them to use bus and rail services.*

Atkins does have a good track record of work on public transport improvements in places such as Kettering and Wellingborough. It is a pity that the people who prepared this study do not appear to have referenced any of the good work that their organisation has been involved in elsewhere in the UK.

Thank you again for the opportunity to comment on the Local Plan.

Yours sincerely,

████████████████████

Town Planner