

Rep ID: T&L001	
Consultee code: General Public	Consultee Organisation (if applicable): N/A
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below:
TL1. What do you think to the scale of growth? Should there be a brownfield target?	
I agree with the scale of growth I feel it is about right for the area. Where possible use brownfield sites.	
TL2. Do you agree that the strategy should look to allocate more employment land?	
Yes more employment land is required locally to stop Ludgershall becoming more of a dormentary Town and to reduce vehicular movements.	
TL3. How could the delivery of employment on the Castledown Business Park be facilitated?	

This site has been poorly managed and advertised from its conception and has been badly let down by both the Chamber of Commerce and Tidworth /Ludgershall Town Councils not getting involved. With the expansion of both Ludgershall & Tidworth this site could be used for urgently needed retail, office space/hospitality to make this site more sustainable.

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

- i) As the military will be posted to Salisbury Plain for longer periods they will put down longer local roots in the community this requires further investigation
- ii) Yes it does need to diversify employment across the Castledown Business Park.
- iii) Lack of land in the area of Station Road Tidworth to expand.
- iv) Yes to support local road improvements in Ludgershall as there is very little scope for any improvements to be carried out without major infrastructure.
- v) Yes the balance of commercial and leisure facilities across Ludgershall area as there is a distinct lack of green playing field facilities in Ludgershall .
- vi) Encourage to investigate the long term opportunities to reopen the MoD railhead as a commercial/passenger line to Andover and beyond as this may encourage businesses to relocate to the Castledown Business Park and reduce vehicular movements on A.342/A.3026. A lot of work has been carried out by the Ludgershall Rail Group in the past and support from Wiltshire Council would be encouraged.

TL5. Is this the right pool of potential development sites?

I would consider that there is the right pool of development sites. Sites 1, 5, 6, & 7 as these areas would have less impact on the infrastructure in this area. I do not consider site 4 should be expanded any more (as the road infrastructure is already causing problems) until a link road to the A.342 can be established but this would require consultation with TVBC

TL6. What land do you think is the most appropriate upon which to build?

I consider sites 5, 6 & 7 to be most appropriate to build on,

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?

Social - as the above sites are further away from Ludgershall Town centre retail would need to be delivered, with environmental would require either car or bus journeys to access facilities further a field.

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

As noted earlier some form of ring/link road required for further growth in Ludgershall.

Further comments

Education - The Wellington Academy will possibly be up to capacity by 2036 and a new secondary facility should be investigated before the Local Plan is published.
Energy - as new gas boilers for home heating are being phased out by 2024 serious consideration should be given to other forms of efficient home energy in relation to Climate Change and the use of electricity.
Sports & Leisure- new facilities will be required in relation to green sports fields in Ludgershall.
Health - there are only two health surgeries in the area and out sourcing facilities will need to be expanded. Facilities for dental surgery is urgently required in the area.

Local economy - although the military is a large employer (low wages) more encouragement is needed for diverse businesses to come to the area and employ local people. There will be more capacity needed for convenience/retail floor space which could be provided on Castledown Business Park.

Transport - I agree there is good strategic road network such as A.303 to M3, A.338 to M4 although these are primary routes and experience a large number of HGV's and both routes should be downgraded from Primary Routes.

Serious consideration should be given to reopening the Ludgershall Railway passenger/commercial services and discussion with Network Rail and train operators is required to reduce traffic to Andover & beyond.

When considering future planning applications provision for shared footpath/cycleways should be factored in with the developer of the building sites.

With the two Towns being in close proximity to one another, Wiltshire Council should encourage both Tidworth & Ludgershall Town Councils to discuss & formulate a joint plan to oversee cost effective facilities being provided for both communities.

Rep ID: T&L002	
Consultee code: Other Advisory Bodies	Consultee Organisation (if applicable): Tidworth and District Chamber of Commerce
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below:
TL1. What do you think to the scale of growth? Should there be a brownfield target?	
TL2. Do you agree that the strategy should look to allocate more employment land?	
TL3. How could the delivery of employment on the Castledown Business Park be facilitated?	
We strongly feel that the land on the site of the Castledown business park should be a priority to keep for business and not allocated for housing until 2036, this needs to be used for employment and services to cope with the demand of the present and	

expanded housing in our area. We recommend the park should made available also for retail and leisure which would fit well and is much needed.

If this site is marked down for Business, leisure, and retail use, which is the perfect site, positioning and traffic wise, we feel that the need for an extra 5 hectares, may not be required until the Castledown business site is filled up.

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

TL5. Is this the right pool of potential development sites?

We support Tidworth and Ludgershall town council views on the best sites for further housing would be sites 2065 and 2065. We also agree a green buffer on the western side of site 2065 with no development would be beneficial to separate Tidworth and Ludgershall .

TL6. What land do you think is the most appropriate upon which to build?

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?

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

Further comments

We would not discount a further site being needed within 15 years which relate to the extra 5 hectares of land mentioned, should things take off and with the economy needing to grow at a good rate, after COVID-19 to get back on track and our ever-growing area.

Rep ID: T&L003	
Consultee code: Parish/Town Council	Consultee Organisation (if applicable): Wiltshire council - Councillor
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below:
TL1. What do you think to the scale of growth? Should there be a brownfield target?	
TL2. Do you agree that the strategy should look to allocate more employment land?	
TL3. How could the delivery of employment on the Castledown Business Park be facilitated?	
4. Castledown Business Park – I believe the use of the site should not be restricted for employment/business but extended for retail and leisure too. It should not be allocated as a site for housing at any time.	

5. I believe that the proposed 5 hectares of land (as yet not identified) for employment will not be required until Castledown Business Park is filled. A 5-hectare site should, therefore, be identified in the next review of the Local Plan.

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

TL5. Is this the right pool of potential development sites?

1. Housing – I do not support the five sites put forward for Tidworth. None are viable for access and sustainability reasons. The two sites to the North of Tidworth (3110 & 3111) will need access directly onto the A338, which will make the viability of site 3110 untenable as there would need to be a buffer between it and the tank track to the North of the site. Site 3111 would back directly onto the Salisbury Plain Training Area and would again need direct access onto the A338 as no other access via the existing road network in Tidworth would be viable. It would also be too close to Sidbury Hill, an ancient hill fort. The report rightly discounts site 3038 but inexplicably seems to support sites 3036 and 3037, which are not sustainable as they are outside the limits of development and are remote from the town. They would also have a material and negative impact on listed military buildings next to the Bulford Road.

2. I believe, therefore, that the only viable sites for housing in the Tidworth Community Area are in Ludgershall. I support the use of sites 2065 and 2066. However, only part of site 2065 should be utilised for housing, this being the land to the East of Somme Road (i.e. the Ludgershall side of the road). Somme Road should be the barrier to any further development taking place as there should remain a buffer between Tidworth and Ludgershall. The land to the West of Somme Road next to the A3026 should, therefore, remain open countryside.

3. Possible sites for Tidworth for the next review of the Local Plan should be the fields either side of the A338 to the North of the tank track and before the military and civilian cemeteries.

TL6. What land do you think is the most appropriate upon which to build?

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?

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

Further comments

Rep ID: T&L004	
Consultee code: Statutory Body	Consultee Organisation (if applicable): Sport England
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below:
TL1. What do you think to the scale of growth? Should there be a brownfield target?	
No Comment	
TL2. Do you agree that the strategy should look to allocate more employment land?	
Yes	
TL3. How could the delivery of employment on the Castledown Business Park be facilitated?	

No comment

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

Creation of a healthy, inclusive sustainable town. this can be done in part through the use of Sport England and Public Health England' Active Design: <https://www.sportengland.org/how-we-can-help/facilities-and-planning/design-and-cost-guidance/active-design> when designing new housing and in environmental improvements

TL5. Is this the right pool of potential development sites?

I have a concern regarding sites 5 and 6 which are adjacent to playing fields. Careful masterplanning of the housing and other development must to place in order not to prejudice the playing fields. Issues such as ball strike and acoustic nuisance needs to be considered.

TL6. What land do you think is the most appropriate upon which to build?

Non-sports land

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?

See above

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

No

Further comments

No

Rep ID: T&L005	
Consultee code: General Public	Consultee Organisation (if applicable):
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below:
TL1. What do you think to the scale of growth? Should there be a brownfield target?	
Certainly wouldn't say we need higher considering how many homes have already been built.	
TL2. Do you agree that the strategy should look to allocate more employment land?	
potentially. I would say most people definately don't currently live and work in Ludgershall!	
TL3. How could the delivery of employment on the Castledown Business Park be facilitated?	

by establishing a train station in Ludgershall and getting the rail line in use.

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

opening the MOD railhead should be a priority. I can't imagine there are many places in the country that already have a working rail line that could be brought into commercial use as relatively easily as this. Most people who live in Ludgershall probably travel east to work.

In terms of place shaping the main Andover Road through Ludgershall often appears run down because of the lack of 'greenery'. It is all concrete and tarmac. Could there be the introduction of street trees along this stretch and generally in more places in the town to give the town a more verdant appearance?

In particular the car park and restaurants/ shops part way down Andover Rd (in front of the Tesco's) really look run down and make the town look unappealing. Please could this area be regenerated in some way?

TL5. Is this the right pool of potential development sites?

TL6. What land do you think is the most appropriate upon which to build?

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?

I think the development of Site 1 - Crawlboys Lane and Site 4 - Andover Lane would negatively affect the rural characters of those lanes and one of the few places apart from round by the castle where the trees and bank side vegetation give a rural feel to the area. It wouldn't negatively impact the landscape aspects.

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

Lots of people cycle along the road between Ludgershall and Andover, please can a cycle lane be introduced here instead of having to cycle on such a fast road. Opening up of the rail line to Andover also needs to be progressed. Details of any strategic nature areas for Ludgershall need to be detailed. Where in the town could there be opportunities to accommodate off site biodiversity net gain? Can the woodlands within the area be linked up so Collingbourne Woods has direct links to other woodlands in the area? Impacts of additional recreation on Collingbourne Woods needs to be addressed.

Further comments

As before in case that wasn't the best place to make my comments:
Lots of people cycle along the road between Ludgershall and Andover, please can a cycle lane be introduced here instead of having to cycle on such a fast road? Opening up of the rail line to Andover also needs to be progressed. Details of any strategic nature areas for Ludgershall need to be detailed. Where in the town could there be opportunities to accommodate off site biodiversity net gain? Can an area of accessible natural green space be created rather than the formal recreation ground? Can the woodlands within the area be linked up so Collingbourne Woods has direct links to other woodlands in the area? Impacts of additional recreation on Collingbourne Woods needs to be addressed.

Rep ID: T&L006	
Consultee code: Parish/Town Council	Consultee Organisation (if applicable): Ludgershall Town Council
Is this response on behalf of someone else/another organisation? Yes	
Organisation being represented (if applicable): Ludgershall Town Council	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below:
TL1. What do you think to the scale of growth? Should there be a brownfield target?	
<ul style="list-style-type: none"> • regarding growth LTC are happy with the current scale of growth and do not want anymore as they feel they have their quota. • There are no Brownfield targets within Ludgershall at this time • and as there are none to identify this target cannot go higher. 	
TL2. Do you agree that the strategy should look to allocate more employment land?	
LTC's view is that this is not needed at this time.	

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

- LTC suggest that Wiltshire Council make it easier for future interested companies by helping with the build costs and setting up utilities.
- Also Market it correctly.

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

LTC looked at this and detail below the priorities they feel should be within the local plan as follows;

- Looking at the infrastructure of the whole town of Ludgershall, support local road improvements to ensure any growth is suitable integrated into the local transport network & support other infrastructure utilities like sewers, communications & water.
- As above including support for the continuation of Empress Way to the south-east of the town.
- Encourage greener/environmental housing, to help with Wiltshire Councils Climate change for 2030.
- Encourage the balancing of commercial leisure uses and community facilities to support housing deliver at Ludgershall.
- Explore long-term opportunities to open the MOD railhead as a commercial line to Andover and the east.

TL5. Is this the right pool of potential development sites?

LTC decided that Ludgershall has more than enough potential development sites and there for no more to consider.

TL6. What land do you think is the most appropriate upon which to build?

LTC discussed and puts forward plots 4 & 5 subject to Tidworth agreeing regards plot 5 and confirmation from MOD that this plot is available as below:

Looking at the Map showing potential developments for assessment, LTC needs confirmation that area 5 on the map is actually available as this is MOD land.

Also looking at area 4 on the map there are 3 areas within this referred to as 2064, 2065 & 2066 (on the SHELLA map) 2066 is Tidworth, 2064 is Ludgershall, however 2065 could be both. We need a boundary map of Ludgershall and Tidworth to ascertain.

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?

LTC discussed and would like to see more climate change with new houses, i.e. Solar Panels, greener houses.

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

- In the past when talking about expanding on the Empress Way estate there was one condition that was agreed before more houses could go up and that was a link road, with a roundabout past Faberstown. This was to save the bridge on the entrance of Empress way from the build-up off traffic. There would also need to be a bridge over the railway at the Faberstown end of town.

Further comments

Rep ID: T&L007	
Consultee code: Other	Consultee Organisation (if applicable): Wiltshire Council
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below:
TL1. What do you think to the scale of growth? Should there be a brownfield target?	
I believe the current scale of growth is correct and would not wish to see any additions to this. There are no Brownfield sites at present therefore the target is not applicable.	
TL2. Do you agree that the strategy should look to allocate more employment land?	
not required at this time	
TL3. How could the delivery of employment on the Castledown Business Park be facilitated?	

future marketing to include retail and leisure use as well as small business. Site need more active marketing with incentives given to encourage new businesses.

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

agree with current list of priorities and would want to see extension of Empress way to east to reduce traffic pressure at the railway bridge junction.
As more younger families have moved into the area due to the army basing programme there is definitely a requirement for more recreational and leisure facilities,

TL5. Is this the right pool of potential development sites?

with the potential site across the border in Hampshire there are more than enough sites in the Ludgershall area

TL6. What land do you think is the most appropriate upon which to build?

I would support more development on sites 2064 and 2065 as there would be better road access onto the A3026 at the western edge (Somme Road), and this would take the pressure from railway bridge junction with Empress Way, therefore not extending further development along railway line to the east. Sites 1,2,3,6&7 are either too close to Wellington Academy, Ludgershall Castle and the conservation area or adjacent to the AONB.
Types of housing - Private housing for local people to buy. In the past there has been too much emphasise given to housing associations and not local people.

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?

climate change environmental guidelines to be adhered to when making any decisions.

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

In the past there has been discussion regarding a link road from a roundabout past Faberstown on the A342. crossing the A3026 Ludgershall Tidworth road and beyond to the north. Maybe a pipe dream but it would alleviate the current traffic issues in Ludgershall.

Further comments

No further points or comments to make.

Rep ID: T&L008	
Consultee code: General Public	Consultee Organisation (if applicable): N/A
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below:
TL1. What do you think to the scale of growth? Should there be a brownfield target?	
The current scale of growth is right Ludgershall does not require this to be higher Brownfield - there are no brownfield sites in Ludgershall at the moment.	
TL2. Do you agree that the strategy should look to allocate more employment land?	
Not at moment if Castledown Business Park is marketed correctly.	
TL3. How could the delivery of employment on the Castledown Business Park be facilitated?	

To allow retail to develop on this site and contact large retail outlets to see if interested. Once agreed that retail can use this site then correct marketing needed with any help that can be provided in setting up new business.

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

Yes, the infrastructure and road improvements for the whole Town is important to be able to sustain any current or future growth. Climate change must be considered in all aspects to encourage environmental housing and greener environment. The support of Empress wWay to the south-east of the Town providing a roundabout and link road is provided on the Wiltshire/Hampshire border to stop all traffic travelling through the Town. Reopen the rialhead as a commercial line to help develop Castledown Business Park and also allow rail travel further a fiell.

TL5. Is this the right pool of potential development sites?

I think the pool of potential development sites is right and no more should be considered.

TL6. What land do you think is the most appropriate upon which to build?

Plot 4 and plot 5, however plot 5 would need Tidworth to also agree. Within plot 4 there are 3 sites and 2064 is the only site wholly within Ludgershall.

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?

Ludgershall needs more social venues for the Youth, economic help by having retail on Castledown Business Park & reopening of the rail line as commercial. Any new housing development should include greener houses.

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

To enhance Empress Way with further development a new access/link road is required on the Wiltshire/Hampshire border as the present entrance to this site via the traffic lights on A3026 could not sustain any further vehicular movements without causing grid lock at peak periods.

Further comments

Rep ID: T&L009	
Consultee code: Parish/Town Council	Consultee Organisation (if applicable): Tidworth Mayor and Wiltshire Councillor
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below:
TL1. What do you think to the scale of growth? Should there be a brownfield target?	
TL2. Do you agree that the strategy should look to allocate more employment land?	
TL3. How could the delivery of employment on the Castledown Business Park be facilitated?	

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

TL5. Is this the right pool of potential development sites?

TL6. What land do you think is the most appropriate upon which to build?

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?

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

Further comments

I strongly oppose the addition of the proposed site being included within the Local Plan. The inclusion of 1700 houses for Ludgershall is totally unacceptable. Whilst they are trying to win favour with the relocation of the fire station (but at the Hampshire border, so further away from Wiltshire residents in the villages and Tidworth!) and the long proposed train station, there is nothing to provide jobs, so making the whole plan unsustainable as people will be travelling in the main (even with train and bus services) by car to work outside of the area.

Diverting much of the traffic to Tidworth is also unwelcome as Tidworth has already had to take on HGVs due to the creation of Winmill Drive. Many school children cross the road on the Ludgershall Road end of Winmill Drive and increasing traffic is going to cause more conflict.

These are just a few initial thoughts.

Rep ID: T&L010	
Consultee code: Statutory Body	Consultee Organisation (if applicable): Wessex Water
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below:
TL1. What do you think to the scale of growth? Should there be a brownfield target?	
Where developing on brownfield sites opportunities must be realised to redirect surface water from the foul water networks and limit the surface water flows from site using multi benefit SuDS schemes.	
TL2. Do you agree that the strategy should look to allocate more employment land?	
TL3. How could the delivery of employment on the Castledown Business Park be facilitated?	

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

TL5. Is this the right pool of potential development sites?

TL6. What land do you think is the most appropriate upon which to build?

Careful consideration of drainage and water supply requirements will be required in Tidworth and Ludgershall with co-operation between the 3 undertakers operating within this area.

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?

Please see comments under TL6.

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

Please see comments under TL6.

Further comments

Careful consideration of drainage and water supply requirements will be required in Tidworth and Ludgershall with co-operation between the 3 undertakers operating within this area.

Rep ID: T&L011	
Consultee code: Other Advisory Bodies	Consultee Organisation (if applicable): The Campaign to Protect Rural Wiltshire (CPRE)
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): yes	If this representation refers to attachment(s), these are listed below: T&L11a T&L11b T&L11c
TL1. What do you think to the scale of growth? Should there be a brownfield target?	
<p>Based on the evidence in the reports we have commissioned we would argue that much less housing is needed 889 houses remain permitted.</p> <p>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.</p> <p>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.</p> <p>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.</p>	

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?

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?

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?

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

Further comments

Much less housing is needed and 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. A need for jobs and services to

catch up before more greenfield houses are allocated in order to reduce commuting and travel. Any site identified should be held back until jobs and services have caught up

Rep ID: T&L012	
Consultee code: Statutory Body	Consultee Organisation (if applicable): Southern Water
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below:
TL1. What do you think to the scale of growth? Should there be a brownfield target?	
No Comment	
TL2. Do you agree that the strategy should look to allocate more employment land?	
no comment	
TL3. How could the delivery of employment on the Castledown Business Park be facilitated?	

No comment

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

no comment

TL5. Is this the right pool of potential development sites?

no comment

TL6. What land do you think is the most appropriate upon which to build?

no comment

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?

no comment

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

Southern Water is the statutory wastewater undertaker for the settlement of Ludgershall. We would normally assess individual sites, as identified on page 8 of the Market Town Planning document, on the basis of the number of homes allocated in order for us to determine the impact of new development on existing local sewer capacity, and whether network reinforcement would be required in advance of occupation in order to accommodate new flows. Given that housing numbers for individual sites have yet to be determined we have only been able to assess whether there will be an impact on any existing assets. We have identified such impacts on Land at Empress Way.

Page 8 of the Market Town Planning document identifies that Land at Empress Way will require careful layout planning due to its proximity to the Ludgershall Wastewater Treatment Works (WTW). In addition, we would require an odour assessment to be carried out in consultation with Southern Water, to ensure future residents would not be affected by odour, and in accordance with paragraphs 182 & 183 of the NPPF.

Our assessment has also revealed that there are existing underground pipes transferring wastewater to the WTW across the site that may also impact the layout of development on Land at Empress Way. Access will be required to existing infrastructure for future maintenance or upsizing, and as such easements would be required, which should be clear of all buildings and substantial tree planting.

Further comments

Rep ID: T&L013	
Consultee code: Landowner	Consultee Organisation (if applicable): Ministry of Defence
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): yes	If this representation refers to attachment(s), these are listed below: T&L13
TL1. What do you think to the scale of growth? Should there be a brownfield target?	
TL2. Do you agree that the strategy should look to allocate more employment land?	
TL3. How could the delivery of employment on the Castledown Business Park be facilitated?	

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

TL5. Is this the right pool of potential development sites?

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:

2.4 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.

TL6. What land do you think is the most appropriate upon which to build?

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?

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

Further comments

Rep ID: T&L014	
Consultee code: Statutory Body	Consultee Organisation (if applicable): Natural England
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): yes	If this representation refers to attachment(s), these are listed below: T&L14
TL1. What do you think to the scale of growth? Should there be a brownfield target?	
TL2. Do you agree that the strategy should look to allocate more employment land?	
TL3. How could the delivery of employment on the Castledown Business Park be facilitated?	

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

TL5. Is this the right pool of potential development sites?

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 be 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 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.

TL6. What land do you think is the most appropriate upon which to build?

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?

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

Further comments

Rep ID: T&L015	
Consultee code: Statutory Body	Consultee Organisation (if applicable): Environment Agency
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): yes	If this representation refers to attachment(s), these are listed below: T&L15
TL1. What do you think to the scale of growth? Should there be a brownfield target?	
TL2. Do you agree that the strategy should look to allocate more employment land?	
TL3. How could the delivery of employment on the Castledown Business Park be facilitated?	

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

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.

TL5. Is this the right pool of potential development sites?

TL6. What land do you think is the most appropriate upon which to build?

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?

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

Further comments

Rep ID: T&L016	
Consultee code: Statutory Body	Consultee Organisation (if applicable): Historic England
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): yes	If this representation refers to attachment(s), these are listed below: T&L16
TL1. What do you think to the scale of growth? Should there be a brownfield target?	
<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>	
TL2. Do you agree that the strategy should look to allocate more employment land?	

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

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

A heritage topic paper might identify certain heritage matters requiring priority attention.

TL5. Is this the right pool of potential development sites?

The Council should consider whether a setting assessment is required to inform the promotion of suitable development sites.
Disclaimer – Historic England has not undertaken a detailed assessment of the suggested sites due to Wiltshire Council's intention to provide further evidence. We therefore respectfully reserve judgement until then.

TL6. What land do you think is the most appropriate upon which to build?

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?

A heritage topic paper might identify certain heritage matters requiring attention.

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

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

Further comments

Rep ID: T&L017	
Consultee code: Developer/Agent	Consultee Organisation (if applicable): FOWLER ARCHITECTURE AND PLANNING
Is this response on behalf of someone else/another organisation? Yes	
Organisation being represented (if applicable): Fowler Homes Ltd	
Does this representation refer to attachment(s): yes	If this representation refers to attachment(s), these are listed below: T&L17a, T&L17b
TL1. What do you think to the scale of growth? Should there be a brownfield target?	
<p>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).</p> <p>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:</p>	

'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 choose 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

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?

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 Shoddesden 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?

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 sites?

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 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.

Further comments

Rep ID: T&L018	
Consultee code: Other	Consultee Organisation (if applicable): Salisbury Reds (Part of the Go South Coast Group)
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): yes	If this representation refers to attachment(s), these are listed below: T&L18
TL1. What do you think to the scale of growth? Should there be a brownfield target?	
TL2. Do you agree that the strategy should look to allocate more employment land?	
TL3. How could the delivery of employment on the Castledown Business Park be facilitated?	

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

TL5. Is this the right pool of potential development sites?

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 serve 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 infrequency 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 site with SUGESTED 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 extend 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.

TL6. What land do you think is the most appropriate upon which to build?

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?

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

Further comments

Rep ID: T&L019

Consultee code: Other

Consultee Organisation (if applicable): Wiltshire Ramblers

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

Organisation being represented (if applicable):

Does this representation refer to attachment(s):
yes

If this representation refers to attachment(s), these are listed below:
T&L19a T&L19b T&L19c

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

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

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

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

TL5. Is this the right pool of potential development 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.

TL6. What land do you think is the most appropriate upon which to build?

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?

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

Further comments

Rep ID: T&L020	
Consultee code: Other Advisory Bodies	Consultee Organisation (if applicable): Network Rail Property (Southern)
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): yes	If this representation refers to attachment(s), these are listed below: T&L20
TL1. What do you think to the scale of growth? Should there be a brownfield target?	
TL2. Do you agree that the strategy should look to allocate more employment land?	
TL3. How could the delivery of employment on the Castledown Business Park be facilitated?	

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

TL5. Is this the right pool of potential development sites?

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.

TL6. What land do you think is the most appropriate upon which to build?

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?

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

Further comments