

# Wiltshire Local Plan Review



Consultation January - March 2021

## Consultation report and next steps

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Appendix 10: Copy of the press release issued 08/01/21: *“Sign up for Wiltshire Local Plan Review online events”*.

Appendix 11: Copy of the press release issued 13/01/21: *“Consultation into the Wiltshire Local Plan begins today”*.

Appendix 12: Copy of the press release issued 10/02/21: *“More than 1,300 people attend Local Plan review engagement sessions as consultation continues”*.

Appendix 13: Copy of the press release issued 02/02/21: *“There is still time to take part in the Wiltshire Local Plan review consultation”*.

Appendix 14: Initial summary of main issues raised through consultation on Wiltshire Local Plan Review as presented to Cabinet on 29 June 2021.

Appendix 15\*: All verbatim representations submitted as part of the Local Plan Review consultation undertaken between 13 January and 9 March 2021.

*\* Due to file size, this appendix has been broken down into a series of separate documents that can be viewed alongside this statement.*

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## **1. Introduction**

- 1.1. The Wiltshire Local Plan Review will, once adopted, provide the strategic planning context for development up to 2036 and determine the level and direction of future growth. Updating the existing Wiltshire Core Strategy (adopted January 2015), the Local Plan Review will incorporate the allocation of a range of sites to meet the identified need for homes and jobs, review of existing development management policies, and provide strategic guidance for the preparation of neighbourhood plans.
- 1.2. This report documents the consultation that was undertaken on the Wiltshire Local Plan Review between 13 January and 9 March 2021 to engage the Wiltshire community on the progress made to date, enabling people to inform proposals.

## 2. How to use this document

2.1. This consultation statement is broken down into a series of sections and appendices that cover all elements of the consultation, as follows:

- **Section 3** provides an overview of the consultation undertaken thus far as part of the Wiltshire Local Plan Review, all of which has informed the work undertaken to date. This is followed by an explanation of the purpose and content of the January to March 2021 consultation.
- **Section 4** details the consultation methods deployed throughout the January to March 2021 consultation.
- **Section 5** provides a statistical overview of the representations received.
- **Section 6** sets out a summary of what the Council consider to be the main issues arising from the consultation.
- **Section 7** utilises the main issues to detail the Council's proposed next steps in response to these issues.
- **The appendices** to this statement set out further detail, including several examples of engagement undertaken and copies of all representations received.

### **3. Wiltshire Local Plan Review consultation overview**

#### **Consultation undertaken to date**

- 3.1. In November 2017 Wiltshire Council began the review of the Wiltshire Core Strategy (renamed the Wiltshire Local Plan). A consultation took place between Tuesday 7 November 2017 and Tuesday 19 December 2017 in accordance with Regulation 18 ('preparation of a local plan') of the Town and Country Planning (Local Planning) (England) Regulations 2012.
- 3.2. The consultation included Housing Market Area (HMA) profiles which highlighted the strategic issues facing each of the county's principal settlements and market towns. The consultation documents were prepared to stimulate discussion on how the review of the Wiltshire Local Plan should be carried out.
- 3.3. Informal consultation then took place in October 2018 in the form of Parish and Town council events. These aimed to further develop the discussion from the 2017 consultation in relation to the scale, location, and direction of growth, in both the urban and rural communities that make up Wiltshire.
- 3.4. During 2019 a series of workshops were held with Town and Parish Councils, as well as Developers to provide updates on the Local Plan Review process. The focus for these sessions was largely centred on how the overall housing numbers could be distributed across Wiltshire in line with the Settlement Strategy set out in the adopted Wiltshire Core Strategy. In addition, a Developer Forum meeting looked at issues focused on development viability and understanding market signals.

#### **Local Plan Review consultation January – March 2021**

- 3.5. Following the approval of Cabinet on 1 December 2020, public consultation was undertaken on the Wiltshire Local Plan Review between 13 January and 9 March 2021 with this report detailing the process and outcomes of this engagement exercise.
- 3.6. The consultation was not on a draft Local Plan but on key components to inform one, including proposals for the scale and distribution of housing and employment growth across Wiltshire. It also sought views on the role of the Local Plan in helping the County adapt to and mitigate for climate change.
- 3.7. A summary of the content consulted upon can be viewed within Table 1.

Table 1: List of documents consulted upon through the Local Plan Review consultation that took place between 13 January and 9 March 2021

Document(s)	Further information
<b>Emerging Spatial Strategy</b>	Contained information relating to the proposed distribution of growth around the county. This was expressed in terms of the amount of new homes and land for employment that each main settlement should accommodate.
<b>Empowering Rural Communities</b>	Set out information including: <ul style="list-style-type: none"> <li>• Framework to support neighbourhood planning and to address local housing needs through an amended Core Policy 44</li> <li>• Housing requirements for each Local Service Centre and Large Village to help guide neighbourhood plans.</li> </ul>
<b>Addressing Climate Change and Biodiversity Net Gain</b>	Set out information including: <ul style="list-style-type: none"> <li>• Five linked key policy themes, in addition to the Spatial Strategy, aiming to help support the Plan's objective in respect of adapting to and mitigating climate change.</li> <li>• Set out our approach on these key themes, asking people to help develop what we already know about the social, economic and environmental challenges facing Wiltshire in terms of a changing climate.</li> </ul>
<b>Planning for (<i>Market Town</i>)</b>  <i>Document produced for each Market Town, namely: Amesbury, Bradford on Avon, Calne, Corsham, Devizes, Malmesbury, Marlborough, Melksham, Royal Wootton Bassett, Tidworth and Ludgershall, Warminster and Westbury.</i>	This suite of twelve documents set out information for each market town, including: <ul style="list-style-type: none"> <li>• Proposed scale of growth (additional new homes and employment land, 2016 to 2036)</li> <li>• Place shaping priorities to guide development (these play a central role in developing planning policies and proposals for development at each place)</li> <li>• Potential development sites</li> <li>• Settlement profiles on important services and infrastructure that will need to be taken into consideration when planning for the future of the town.</li> </ul>
<b>(<i>Market Town</i>) Site Selection report</b>  <i>Document produced for each Market Town, namely: Amesbury, Bradford on Avon, Calne, Corsham, Devizes, Malmesbury, Marlborough, Melksham, Royal Wootton Bassett, Tidworth and Ludgershall, Warminster and Westbury.</i>	This suite of twelve documents set out information for each market town, including: <ul style="list-style-type: none"> <li>• The justification for how the set of potential development sites was arrived at.</li> </ul>

Document(s)	Further information
<p><b>Planning for (<i>Principal Settlement</i>)</b></p> <p><i>Document produced for each Principal Settlement, namely: Chippenham, Salisbury and, Trowbridge.</i></p>	<p>This suite of three documents set out information for each principal settlement, including:</p> <ul style="list-style-type: none"> <li>• Proposed scale of growth (additional new homes and employment land, 2016 to 2036)</li> <li>• Place shaping priorities to guide development (these play a central role in developing planning policies and proposals for development at each place)</li> <li>• Preferred development site</li> <li>• Concept plans for each preferred site (illustrating a way the land identified can be developed)</li> <li>• Settlement profiles on important services and infrastructure that will need to be taken into consideration when planning for the future of the town.</li> </ul>
<p><b>(<i>Principal Settlement</i>) Site Selection report</b></p> <p><i>Document produced for each Principal Settlement, namely: Chippenham, Salisbury and, Trowbridge.</i></p>	<p>This suite of three documents set out information for each principal settlement, including:</p> <ul style="list-style-type: none"> <li>• The justification for how the set of preferred development sites was arrived at.</li> </ul>
<p><b>Supporting documents</b></p> <p><i>Several supporting documents were prepared informing the proposals, these are listed opposite.</i></p>	<ul style="list-style-type: none"> <li>• <b>Local Plan Review Interim Sustainability Appraisal</b> <ul style="list-style-type: none"> <li>○ Documents included Non-Technical Summary, Interim Sustainability Appraisal (incorporating Strategic Environmental Assessment), Annex I (Assessment of Alternative Development Strategies for the four Housing Market Areas and Annex II (Principal Settlements: Site Assessments)</li> </ul> </li> <li>• <b>Habitats Regulations Assessment Screening Opinion</b> <ul style="list-style-type: none"> <li>○ Single document: Wiltshire Local Plan Review Habitats Regulations Assessment Scoping Report</li> </ul> </li> <li>• <b>Local Transport Review</b> <ul style="list-style-type: none"> <li>○ Single document: Wiltshire Local Plan Transport Review</li> </ul> </li> <li>• <b>Formulating Alternative Development Strategies</b> <ul style="list-style-type: none"> <li>○ Documents included: Chippenham Housing Market Area (Formulating Alternative Development Strategies), Salisbury Housing Market Area (Formulating Alternative Development Strategies), Swindon Housing Market Area (Formulating Alternative Development Strategies), Trowbridge Housing Market Area (Formulating Alternative Development Strategies),</li> </ul> </li> <li>• <b>Retail and Town Centre documents</b> <ul style="list-style-type: none"> <li>○ Documents included: Wiltshire Retail and Town Centre Study 2020 Volume 1 (main text), Wiltshire Retail and Town Centre Study 2020 Volume 2 (appendices), Wiltshire Core Strategy retail review 2015 plus appendices 1 – 37.</li> </ul> </li> </ul>

Document(s)	Further information
	<ul style="list-style-type: none"> <li>• <b>Local Housing Needs Assessment</b> <ul style="list-style-type: none"> <li>○ Single document: Swindon Borough Council &amp; Wiltshire Council Local Housing Needs Assessment 2019</li> </ul> </li> <li>• <b>Employment Land Review</b> <ul style="list-style-type: none"> <li>○ Single document: Employment Land Review 2018 plus appendices 1 – 8.</li> </ul> </li> <li>• <b>Functional Economic Market Assessment</b> <ul style="list-style-type: none"> <li>○ Single document: Swindon and Wiltshire Functional Economic Market Assessment 2016 plus appendices 1 – 8.</li> </ul> </li> <li>• <b>Level 1 Strategic Flood Risk Assessment</b> <ul style="list-style-type: none"> <li>○ Single document: Wiltshire Council Level 1 Strategic Flood Risk Assessment</li> </ul> </li> <li>• <b>Informal consultation reports (Autumn 2019)</b> <ul style="list-style-type: none"> <li>○ Five documents detailing the process and outcome of this consultation.</li> </ul> </li> <li>• <b>Informal consultation reports (Autumn 2018)</b> <ul style="list-style-type: none"> <li>○ Two documents detailing the process and outcome of this consultation.</li> </ul> </li> <li>• <b>Regulation 18 Issues and Options consultation statements (Autumn 2017)</b> <ul style="list-style-type: none"> <li>○ Four documents detailing the process and outcome of this consultation.</li> </ul> </li> </ul>

## 4. Consultation methods

- 4.1. Consultation on the Wiltshire Local Plan Review ran from 13 January to 9 March 2021 (a period of eight weeks).
- 4.2. Due to the ongoing COVID-19 pandemic the consultation was carried out in line with the Council's adopted Statement of Community Involvement (SCI) and Temporary Arrangements. The temporary arrangements document represented a response to guidance<sup>1</sup> to Local Planning Authority's to review their SCI in accordance with Government advice aimed at preventing the spread of COVID-19.
- 4.3. The measures within the Temporary Arrangements document reflect the necessity to allow plan-making to progress while promoting effective community engagement by means which are reasonably practicable.
- 4.4. The consultation was also undertaken in full accord with The Town and Country Planning (Local Planning) (England) (Coronavirus) (Amendment) Regulations 2020. This emergency legislation changed the requirement under Regulation 35(1)(a) of The Town and Country Planning (Local

<sup>1</sup> Planning Practice Guidance: Plan Making <https://www.gov.uk/guidance/plan-making> (Paragraphs 077 & 078).

Planning) (England) Regulations 2012 for councils to make copies of development plan documents available for inspection at their principal offices and at such other places within their area as the local planning authority consider appropriate, during normal office hours. A council can instead comply with Regulation 35(1)(a) by making development plan documents available on their website. This change applied from 16th July 2020 until 31st December 2020 but was extended until 31 December 2021.

**Who was consulted and how?**

4.5. Utilising the SCI alongside legislative criteria governing regulatory stages of plan making<sup>2</sup>, the following organisations, groups and individuals were notified of the consultation and invited to comment:

- Specific consultation bodies (including Environment Agency, Natural England, Historic England, NHS and, Highways England)
- Neighbouring local authorities
- All parish and town councils
- Parish and town councils adjacent to Wiltshire
- Wiltshire Councillors
- Individuals, community groups and organisations who have previously requested to be informed about updates relating to Wiltshire planning policy

4.6. Consultees were made aware or formally notified of the consultation through a variety of means as illustrated within Table 2.

*Table 2: Lists various means by which consultees were made aware of the Wiltshire Local Plan Review consultation.*

Consultation method	Further information
<b>Notification emails sent to Spatial Planning mailing list</b> (circa 1,500 recipients on mailing list)	Contact was made with consultees on Wiltshire Council’s Spatial Planning mailing list, including those who asked to be notified on the progress on the Wiltshire Local Plan Review. Notification dates included 06/01/21 (Appendix 1), 13/01/21, 22/02/21, 23/02/21.
<b>Notification letters sent to Spatial Planning mailing list</b>	Postal contact was made with consultees on Wiltshire Council’s Spatial Planning mailing list who requested to be notified via this

<sup>2</sup> The Town and Country Planning (Local Planning) (England) Regulations 2012

Consultation method	Further information
(circa 78 recipients on mailing list requested postal notifications)	means. The notification letter sent at the beginning of the consultation can be viewed at Appendix 2.
<b>Inclusion within Wiltshire Council email newsletter sent to residents</b> (circa 23,000 recipients on mailing list)	Information advising residents of the Wiltshire Local Plan Review consultation was included within newsletters sent to residents on the mailing list nine times between the dates 13/01/21 (Appendix 3) and 05/03/21.
<b>Inclusion within Wiltshire Council email newsletter sent to businesses</b> (circa 3,5000 recipients on mailing list)	Information advising businesses of the Wiltshire Local Plan Review consultation was included within newsletters sent to businesses on the mailing list three times between the dates 19/02/21 (Appendix 4) and 05/03/21.
<b>Inclusion within newsletter sent to Wiltshire Council members</b> (98 recipients on mailing list)  <b>Inclusion within councillor briefing note no. 21-02</b>	Information advising Wiltshire Council members of the Wiltshire Local Plan Review consultation was included within newsletters sent to members on the mailing list seven times between the dates 13/01/21 (Appendix 5) and 05/03/21.  In addition to these newsletter's councillor briefing note no. 21-02 provided detail on the Local Plan Review consultation, including how to get involved.
<b>Inclusion within newsletter sent to Wiltshire town and parish councils</b> (circa 250 recipients on mailing list)	Information advising Wiltshire Council town and parish councils of the Wiltshire Local Plan Review consultation was included within newsletters sent to all town and parish councils six times between the dates 13/01/21 (Appendix 6) and 05/03/21.
<b>Social Media</b> (reach 764,775)	Information advertising the Wiltshire Local Plan Review consultation was shared across 48 posts in total, 24 on Facebook and 24 on Twitter. This facilitated 1,017 clicks to the Wiltshire Local Plan Review consultation webpage, had a reach of 764,775, received 130,892 impressions and 290 retweets/shares.
<b>Public Notice</b>	Public notices were placed within local newspapers covering the county, namely the Wiltshire Times, Salisbury Journal and the Wiltshire Gazette and Herald. The notice published, during week commencing 11 <sup>th</sup> January, can be viewed at Appendix 7.
<b>Press releases</b>	A series of press releases were issued advertising the Wiltshire Local Plan Review consultation, namely:

Consultation method	Further information
	<ul style="list-style-type: none"> <li>• 01/12/20: “Cabinet agrees next steps for Wiltshire Local Plan review” (Appendix 8).</li> <li>• 18/12/20: “Sign up to online events and have your say about where future developments should take place in Wiltshire” (Appendix 9).</li> <li>• 08/01/21: “Sign up for Wiltshire Local Plan Review online events” (Appendix 10).</li> <li>• 13/01/21: “Consultation into the Wiltshire Local Plan begins today” (Appendix 11).</li> <li>• 10/02/21: “More than 1,300 people attend Local Plan review engagement sessions as consultation continues” (Appendix 12).</li> <li>• 02/02/21: “There is still time to take part in the Wiltshire Local Plan review consultation” (Appendix 13).</li> </ul> <p>Each press release is placed on the Wiltshire Council website, promoted on social media, and sent to a variety of sources including all Wiltshire Council members, Town &amp; Parish councils along with local/regional and some national media.</p>

4.7. As noted throughout the advertisement material, the consultation documents were made available to view on the Wiltshire Council website. Respondents were able to respond to the consultation via post, email or the use of online Microsoft Forms associated with each consultation paper.

4.8. Arrangements were also put in place to allow people who did not have access to the internet to have hard copies sent to them by post. Those community members and stakeholders requiring alternative access to documents, including hard copies, were encouraged to contact Wiltshire Council by phone to request this service.

4.9. The consultation was also supported by an interactive portal map illustrating the preferred (Principal Settlements) and potential (Market Towns) development sites. By navigating the portal map and clicking on a site of interest, users were able to follow links to information relating to each site of interest. Alongside sites, users could also view planning constraints, environmental constraints, and heritage assets. The portal map was viewed a total of circa 4,690 times during the consultation period.

### Live events

4.10. As part of the Local Plan Review consultation a series of 17 live online consultation events were held for communities and other stakeholders to attend. This included one event per Market Town and Principal

Settlement and two rural events which encompassed all other Wiltshire villages and settlements. In total, more than 1,300 people attended the live consultation events.

4.11. Each event was held between 7pm-8pm on the scheduled date (Table 3).

*Table 3: List of live online consultation events held as part of the Local Plan Review consultation.*

<b>Place / event held</b>	<b>Date</b>
Calne	Monday 18 January 2021
Corsham	Tuesday 19 January 2021
Royal Wootton Bassett	Tuesday 19 January 2021
Chippenham	Wednesday 20 January 2021
Tidworth and Ludgershall	Wednesday 20 January 2021
Malmesbury	Thursday 21 January 2021
Amesbury	Thursday 21 January 2021
Marlborough	Monday 25 January 2021
Bradford-on-Avon	Monday 25 January 2021
Salisbury	Tuesday 26 January 2021
Westbury	Tuesday 26 January 2021
Devizes	Wednesday 27 January 2021
Trowbridge	Wednesday 27 January 2021
Melksham	Thursday 28 January 2021
Warminster	Thursday 28 January 2021
Proposals for Rural Communities	Monday 1 February 2021
Proposals for Rural Communities	Tuesday 2 February 2021

4.12. Each event included a presentation, the PowerPoint version of which was made publicly available after each respective event. Each presentation summarised the content of the consultation and gave further explanation about the proposals relevant to each area. Each presentation was followed by a question-and-answer session. Participants were able to submit questions in live time, many of which were answered during the event.

4.13. Because of the volume of questions, it was not possible for all questions to be answered in every event. Instead, and to ensure transparency for those who were unable to attend, all questions asked were recorded and answered within documents produced following the completion of the live events.

## **5. Representations**

5.1. A considerable response was received to the consultation. Overall, more than 3,500 representations were made from circa 2,680 people and organisations. Further detail can be found within Table 4.

Table 4: Provides a statistical overview of the number of comments received and from how many respondents they were received from.

Consultation document	Number of representations received	Number of respondents	Number of representations after analysis
Emerging Spatial Strategy	372	324	401
Climate Change	163	158	177
Empowering Rural Communities	337	317	347
Supporting Evidence	61	38	76
Amesbury	18	18	22
Bradford on Avon	674	667	685
Calne	152	143	152
Chippenham proposals	357	375	368
Chippenham concept plans	116		124
Corsham	40	40	41
Devizes	118	111	124
Malmesbury	61	61	66
Marlborough	52	48	60
Melksham	102	95	105
Royal Wootton Bassett	59	57	65
Salisbury proposals	249	289	252
Salisbury concept plans	108		108
Tidworth and Ludgershall	14	14	20
Trowbridge proposals	348	360	356
Trowbridge concept plans	49		53
Warminster	25	24	31
Westbury	39	33	39
<b>Total</b>	<b>3514</b>	<b>*2682</b>	<b>**</b>

*\*The number of respondents does not add up to the sum of the figures against each paper as some respondents commented on multiple documents.*

*\*\*Following data analysis, whereby representation content was analysed and, in some cases, separated and placed against the relevant paper, the number of representations appears higher.*

5.2. There was a significant volume of opinion put forward, often taking different positions. A summary of which has been provided within the following section of this report, focusing on main issues emerging from the consultation.

## 6. Summary of main issues

6.1. This section sets out an overview of the main issues arising from the consultation. These represent a summary, against each consultation document, of the representations received with the main issues being presented in no order of importance.

6.2. The presentation of main issues is structured as follows:

- Emerging spatial strategy
- Empowering rural communities
- Addressing climate change and biodiversity net gain
- Planning for:
  - o Amesbury
  - o Bradford-on-Avon
  - o Calne
  - o Chippenham
  - o Corsham
  - o Devizes
  - o Malmesbury
  - o Marlborough
  - o Melksham
  - o Royal Wootton Bassett
  - o Salisbury
  - o Tidworth and Ludgershall
  - o Trowbridge
  - o Warminster
  - o Westbury
- Comments on supporting evidence

6.3. Under each of the above headings, main issues are presented in a tabular format. Initially, the principal issues raised by specific consultation bodies<sup>3</sup> are presented followed by a separate table documenting a reflection of the main issues raised by all consultees against each question posed within the consultation. The information presented within these tables represents an expansion of the initial summary of main issues presented to Wiltshire Council's Cabinet on 29 June 2021, a copy of which can be found at Appendix 14.

6.4. A complete copy of all representations received can be viewed at Appendix 15. Given the volume of representations received the appendix has been published separately to this statement for ease of viewing. This can be found on the Wiltshire Council Website at:

<https://www.wiltshire.gov.uk/planning-policy-local-plan-review>

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<sup>3</sup> Specific consultation bodies are those as listed within Regulation 2 of The Town and Country Planning (Local Planning) (England) Regulations 2012

6.5. If you are having trouble in accessing these comments, please contact the Spatial Planning Service via:

- Telephone: 01225 713223
- Email: [spatialplanningpolicy@wiltshire.gov.uk](mailto:spatialplanningpolicy@wiltshire.gov.uk)

## Emerging spatial strategy

6.6. A summary of comments from specific consultation bodies can be found within Table 5.

*Table 5: Provides a summary of comments from specific consultation bodies on the emerging spatial strategy paper.*

<b>Comments from specific consultation bodies</b>
<p><b>Natural England</b></p> <ul style="list-style-type: none"><li>• Opportunity for the plan to be environmentally ambitious. Protecting and enhancing the natural environment.</li><li>• Felt that where relevant linkages should be made 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.</li><li>• Development should be directed towards land with the least environmental / amenity value and the SA and HRA should clearly evidence this. This includes avoiding allocations on designated sites, local wildlife sites, best and most versatile agricultural land, protected landscape and priority habitats.</li><li>• Criteria based policies should ensure the protection of designated biodiversity and geological sites and distinguish between international, national and local sites. These should be clearly included on the proposals map to aid their identification in the context of proposed developments for their protection and enhancement.</li></ul> <p><b>Highways England</b></p> <ul style="list-style-type: none"><li>• Transport and land use planning policy should be closely integrated to ensure any impacts and needs for improvements are identified at an early stage in the plan making process.</li><li>• Some concerns with relation to the impact of development on the Strategic Road Network, particularly on the A36 resulting from growth at Salisbury and on M4 Junction 17 resulting from growth at Chippenham.</li></ul> <p><b>Historic England</b></p> <ul style="list-style-type: none"><li>• Broadly support the use of red/amber/green assessments of settlements in relation to the historic environment in formulating the alternative development strategies, but these may need further detailed evaluation.</li><li>• Support for the identification and allocation of brownfield sites in historic settlements where account is taken of the character and identity of these places.</li><li>• Concerned there may not be the capacity for every settlement to meet the spatial strategy commitments and levels of growth envisaged without causing significant harm to the historic environment.</li><li>• State a need for clarification that the draft spatial strategy does not predetermine the capacity of every settlement and that further evidence may inform a review of those numbers.</li></ul>

**Thames Water**

- Raised a need to assess the wastewater and water supply infrastructure demands of new development and assess potential offsite impacts.
- Concerned that population growth and climate change will continue to put pressure on water resources in the Thames Water region, which is designated as 'seriously water stressed' by the EA.
- Outlined that water and sewage treatment works will likely need upgrades or extensions to service new development and reducing risks of flooding from sewers and water and sewerage infrastructure development may be necessary in flood risk areas.

**NHS (Property Services)**

- Commented that the spatial strategy must guarantee appropriate funding is collected through developer contributions for health and care services in order to meet growing demand.

**Defence Infrastructure Organisation (Safeguarding)**

- Commented that new development should avoid MOD safeguarding zones.
- Concern that development within aerodromes consultation areas may create an attractant environment for large and flocking bird species, creating a birdstrike risk.
- State that developments for renewable energy should avoid a detrimental impact on defence operations.

**Network Rail**

- Concerned that the Transport Review does not consider the aspirations for new or re-opened railway stations in Wiltshire.
- Commented that new development should be concentrated and consolidated at or near to existing or proposed railway infrastructure and hubs.
- Stated that development should reduce risk at level crossings so far as reasonably practicable.

**Swindon Borough Council**

- Raised a need for clarity relating to a divergence from the housing need figure in the Local Housing Needs Assessment for the Housing Market Area and that provided in the Emerging Spatial Strategy paper.
- Comments agree that growth on the edge of Swindon would not benefit climate change outcomes, Swindon's services, or Wiltshire Communities.
- Suggested additional factors for Royal Wootton Bassett place shaping priorities are to maintain the capacity of road infrastructure and that education, health and cemetery needs should be met locally.

**Bath and North East Somerset Council**

- Some concern raised over the significant scale of growth proposed at Chippenham.
- Comments highlight the potential cross boundary transport impacts arising from growth at both Trowbridge and Chippenham.
- Support priorities to increase employment and self-containment at both Trowbridge and Chippenham.

**Dorset Council**

- Raised the potential for the housing needs of Shaftesbury to be met on the Wiltshire side of the border, which is currently a constraint to development.
- Reiterated a commitment to reserve a corridor for an eastern bypass to Shaftesbury.

**New Forest District Council**

- Commented that growth within the visitor catchment area of the New Forest Special Protection Area/Special Conservation Area, including part of Salisbury, Downton, Morgan’s Vale/Woodfalls and Whiteparish, will have a recreational impact on the New Forest Natura 2000 sites.
- Support continued joint working on the mitigation strategy for water quality and mitigation of nutrient enrichment on the River Avon.

**New Forest National Park Authority**

- Support for the focus of growth towards Principal Settlements.
- Commented that there is not currently a requirement for unmet housing needs within the National Park to be addressed within the Wiltshire area.
- Recommended that the Local Plan explicitly highlights a need for planning decisions to consider any potential impacts on the National Park.

**South Somerset District Council**

- Broadly supportive of the approach taken to disaggregation of housing need in the Trowbridge Housing Market Area.
- Supportive of improvements to the strategic road network between the M3 and the M5.

6.7. A summary of the main issues raised, against each consultation question, can be found within Table 6.

*Table 6: Provides a summary of comments, alongside main issues, on the emerging spatial strategy paper.*

<b>Consultation question:</b> Please enter any comments you have regarding the Emerging Spatial Strategy.
<b>Principal line(s) of argument:</b>
<b>Amount of housing</b>

Comments generally related to concerns about perceived environmental impacts of the range of number of homes proposed. Other concerns related to infrastructure capacity; difficulties in sustaining a five-year supply when using a housing strategy that exceeds the Government's standard method; job growth not supporting a higher housing number; the amount of housing proposed being justification to deliver development at Chippenham; and that the evidence underpinning the housing numbers is out of date due to the impacts of the COVID-19 pandemic and its resultant impacts on the economy.

Contrasting feedback, mainly from developer led interests, commented that a higher number than the standard method would be supported, with many supporting the higher end of the range or above. Some comments that the housing requirement should be set higher than the upper range figure. This could boost supply over the assessed need of the Wiltshire Core Strategy (44,000), support a longer plan period, deliver more affordable homes, reflect recent high levels of delivery, respond to and support economic recovery, and marry up with the maximum forecasts of five or ten-year migration trends in housing market areas where they differ.

### **Climate change**

Concern that the strategy does not do enough to address climate change, as it represents a 'business as usual' approach focused on greenfield allocations and reliance on car travel. Comments also stated that there should be carbon budgeting with measurable targets set by the plan and concerns were raised that a lack of employment alongside housing growth at main settlements would exacerbate out commuting and increase carbon footprint.

Feedback was also received, mainly from developer led interests, that the strategy should focus growth on "sustainable settlements", with general support for the main settlements. The strategy should extend "sustainable settlements" to include local service centres and large villages.

### **Transport**

Concerns raised that the main settlements suffer from congestion and additional growth could not be supported for this reason and greater emphasis should be placed on accessibility by active modes of travel and brownfield development.

The developer community stated that a focus on sustainable settlements could reduce the need to travel and support more sustainable transport modes, including some arguments that settlements near Salisbury (Laverstock and Wilton) and Swindon (Purton and Cricklade) are well located to support more environmentally friendly transport links.

### **Distribution of growth**

Comments raised concerns that there was too much emphasis placed upon greenfield sites and brownfield sites should be prioritised; comments that the COVID-19 pandemic will change behaviours and potentially release land for new homes (e.g. in town centres). Observations include that the strategy should seek to reverse the decline of town centres and that the inability to meet growth in the Trowbridge Housing Market Area (HMA) will impact on locations in Melksham Community Areas in the adjoining HMA.

Comments were received regarding the split of the Melksham Community Area between the Trowbridge and Chippenham HMAs including by Semington Parish Council, raising concerns about the inclusion of Semington Parish in the Trowbridge HMA, requesting that this be revisited.

Comments were also received from Trowbridge Town Council that growth at Trowbridge should be dispersed around the town, with considerations for village locations and a Green Belt review.

Those with developer led interests, stated that there is too great a focus on large sites at Chippenham, Trowbridge and (to a lesser degree) Melksham to ensure timely housing delivery. It was argued that higher scales of growth are necessary at other market towns and concerns raised that there is too much of a focus on main settlements when rural settlements can play a greater role than solely meeting local need. Other observations were that opportunities to extend Swindon west have not been properly considered and that there is too much emphasis upon brownfield land.

Cotswold Business Park / Kemble Airfield was also promoted as new community for 2,000 homes (of which a significant part is in Cotswold District Council).

### **Economy**

Comments generally raised concerns that growth should provide more employment to balance jobs and homes and reduce commuting. It was also felt that the move towards carbon neutrality and changing behaviour as a result of the COVID-19 pandemic will affect employment needs.

The developer community commented that the Local Plan economic evidence is out of date and needs to be revisited. Comments expressed that further evidence is needed on sectoral requirements. Land at Junctions 16 and 17 of the M4 were promoted for strategic employment use.

### **Plan period**

Those with developer interests commented that the end date of the plan should be altered so that it plans at least 15 years ahead at the time of adoption (2038 to 2041) and that the plan baseline should be brought up to date so that it plans positively for the future (2020 or 2021).

### **Neighbourhood planning**

Cross cutting feedback was that clarity was needed regarding the relationship between the Local Plan and neighbourhood plans.

The community comments that clarity was needed relating to neighbourhood plan requirements for towns, the purpose of brownfield targets and the relationship between the latter and the overall requirement for main settlements.

The developer community felt that the delivery strategy should not rely on a large proportion of homes needed being brought forward by neighbourhood planning.

### **Areas of Outstanding Natural Beauty**

Comments were received from the three Areas of Outstanding Natural Beauty (AONB) that overlay Wiltshire. The Cranbourne Chase AONB raised concerns that the review doesn't include dark night sky policies or strategies for the ecological and climate emergencies; and were broadly supportive of directing growth toward principal settlements, stating that major development within AONBs should be avoided. The Cranbourne Chase AONB expressed support for a threshold of 5 dwellings for the provision of affordable housing in AONBs and a policy for dark night skies in all developments and concern about the impact of new development at Local Service Centres and Large Villages, on the conservation and enhancement of the AONB.

The Cotswolds AONB raised a concern the Standard Methodology doesn't constitute housing need and that meeting the standard method housing need figure should not be at the cost of impacts on protected areas, such as AONBs. It was also commented that there should be an assessment of whether the standard method housing need figure is achievable taking relevant constraints into account. It was requested that support be provided to focus growth at main settlements; with growth in rural area to meet affordable housing need and provide local services; the delivery principles; and prioritising brownfield redevelopment.

The North Wessex Downs Area of Outstanding Natural Beauty gave support for a 5 dwelling threshold and 40% target for affordable housing delivery in AONBs.

### **Main issue(s) raised:**

- Proposed housing number range disputed, with differing views over whether the numbers are too high/too low

- There is a tension between the growth strategy and climate reduction targets, with a need for these to be clearly aligned through the Local Plan.
- A need to ensure transport infrastructure improvements accompany and support the strategy for growth.
- Clear support for the identification and prioritisation of brownfield land in meeting strategic housing needs.
- A primary focus and reliance on large sites at Principal Settlements risk issues of delivery and coalescence with surrounding towns and villages.
- Planned growth at rural settlements is one approach identified in diversifying supply.
- Strategic opportunities for both employment and residential growth were identified outside of main settlements.
- Housing growth that isn't accompanied by employment land is like to lead to out commuting.
- Employment evidence needs to be reviewed in light of changing behaviour as a result of the COVID-19 pandemic.
- The Local Plan should have at least a 15-year life upon adoption.
- Clarity is needed relating to the relationship between the Local Plan and neighbourhood plans, and the role and basis of brownfield targets.
- The Local Plan should avoid relying on neighbourhood plans to deliver housing targets and sites.

**Empowering rural communities**

6.8. A summary of comments from specific consultation bodies can be found within Table 7.

*Table 7: Provides a summary of comments from specific consultation bodies on the empowering rural communities paper.*

<b>Comments from specific consultation bodies</b>
<p><b>Natural England</b></p> <ul style="list-style-type: none"> <li>• Advise bolstering Core Policy 44 to read, ‘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.</li> </ul> <p><b>Sport England</b></p> <ul style="list-style-type: none"> <li>• Supports the proposal for a target of 40% affordable homes on all new schemes of more than five dwellings and the proposal to restrict permitted development rights.</li> <li>• Table 2.2 - there should be a separate section for playing fields - there is an adopted playing pitch strategy which can inform this as well as paragraph 97 in the NPPF. Playing pitches should not be rolled up with Local Green Space.</li> </ul>

6.9. A summary of the main issues raised, against each consultation question, can be found within Table 8.

*Table 8: Provides a summary of comments, alongside main issues, on the empowering rural communities paper.*

<b>Consultation question:</b> Do you agree there should be a target of 40% affordable homes on all new schemes of more than five dwellings? What other approaches might there be?
<p><b>Principal line(s) of argument:</b></p> <p>Many were supportive of the 40% target proposal with some asking that it be a minimum and others that it should be higher, including suggestions that a 50% target for Areas of Outstanding Natural Beauty. Others noted that the 40% target would need to be viability tested before it can be justified. Some suggested that a 40% target would compromise quality and mean greater proportion of larger homes for house builders to meet profit expectations.</p>

However, some felt that the target should be less than 40%, potentially a baseline target of 20% with parish and town councils given scope to set higher targets in neighbourhood plans. It was also highlighted that different targets to be set for different types/locations of sites similar to national guidance. Similarly, others expressed concerns that 'wherever possible' encouraged negotiation of lower provision, whereas others called for greater flexibility to reflect actual need at a point in time.

Some support was received with regard to the 5-dwelling threshold with some suggesting it be increased to 10 dwellings to increase affordable homes in rural areas. A lower threshold of 2 dwellings was suggested in Areas of Outstanding Natural Beauty.

However, the majority of responses were unsupportive, raising concerns that this is inconsistent with national policy and presupposes that applications for Designated Rural Status would be successful. Whilst some expressed concerns that the 5-dwelling threshold approach would encourage developers to breakup larger sites or would impact on the viability of rural sites.

**Main issue(s) raised:**

- The proposal to set a target of 40% affordable homes was generally supported.
- Parish and town councils should be given the scope to set targets in neighbourhood plans. The target should reflect actual need for a particular place.
- The 5-dwelling threshold should be increased to 10 dwellings to increase the number of affordable homes but should be lowered for more sensitive areas such as AONBs.
- The 5-dwelling approach is inconsistent with national policy and could encourage developers to breakup larger sites and impact on the viability of rural sites.

**Consultation question:** Do you agree with the approach set out in the suggested revised Core Policy 44? If not, why not? How could it be improved?

**Principal line(s) of argument:**

The responses received were mixed, some in general agreement and support for the proposed policy, while others raised concerns. Some considered that the maximum homes on sites should remain as 10; others suggested 20 homes on some sites would be unviable therefore increasing to a maximum of 30 dwellings, being no larger than 5% of the existing village size. It was also suggested that Housing Needs Assessments should cover both affordable and market housing and that terms such as 'community support', 'genuine local need', 'community led' and 'affordable' should be clearly defined. The inclusion of Community Let Homes (CLH) is supported but should reflect that this can be provided by groups other than Community Land Trusts, for example co-operatives. It was suggested that an additional exceptions policy is needed to support both affordable and market custom/self-build

housing. It was also suggested that appropriate housing density should be one of the policy criteria and that provision should be made for down-sizing/retirement homes.

Concerns were expressed about the 25% market homes cross-subsidy and that it is not justified. Concerns were also raised at allowing cross-subsidy of up to 50% market homes on CLH sites is too high, however others suggested that this should apply to all schemes. Whilst it was also noted that self-build homes can't be retained as affordable in perpetuity. Further concerns raised suggested that the approach does not reflect the use of brownfield sites.

**Main issue(s) raised:**

- Some considered maximum homes on sites should remain as 10; others suggested 20 homes on some sites would be unviable - increase to a maximum of 30 dwellings, being no larger than 5% of the existing village size.
- Housing Needs Assessments should cover both affordable and market housing.
- An additional exceptions policy is needed to support both affordable and market custom/self-build housing.
- Appropriate housing density should be one of the policy criteria.
- Provision should be made for down-sizing/retirement homes.

**Consultation question:** Do you think this approach (restricting PD rights) is worth pursuing?

**Principal line(s) of argument:**

Views were mixed in response to this potential approach. Comments in support of this approach suggested that national policy encourages the need for a mix of housing to support local needs and vitality of rural communities. Others commented that this approach would be justified if it is the best way of maintaining a good mix of housing for the vitality of the county's villages. It was suggested that the removal of permitted development rights be should only be applied to new and existing affordable homes regardless of size.

Criticisms of this approach included comments suggesting that it is wrong to restrict /withdraw permitted development rights because people extend their properties to accommodate growing families due to the restricted supply of larger housing and because moving is unaffordable. Also, that this approach is at odds with national policy which clear that policies should be positive and support sustainable development in rural areas and that permitted development rights should only be removed in exceptional circumstances and there is no evidence to justify their removal/restriction. The Government is clear that people should be able to alter and extend their own homes, which has led to a significant expansion of permitted development rights reflective of this presumption to support homeowners. Other comments received suggested that rural areas are already disadvantaged (poorer transport, more expensive internet, lower internet speeds, etc.), therefore removing permitted development rights would be inequitable to those in urban areas

with permitted development rights. Also, it was suggested that extending homes encourages redevelopment of buildings in need of repair, the proposed approach would prevent this.
<p><b>Main issue(s) raised:</b></p> <ul style="list-style-type: none"> <li>• The removal of permitted development rights should only be applied to new and existing affordable homes regardless of size.</li> <li>• The approach would be contrary to national policy which advises that permitted development rights only be removed in exceptional circumstances. Also, permitted development rights have been relaxed in recent years to allow more substantial development as permitted development.</li> </ul>
<p><b>Consultation question:</b> What local evidence would be needed to justify applying restrictions like these?</p>
<p><b>Principal line(s) of argument:</b></p> <p>It was suggested that the need for restrictions to permitted development rights should be informed by housing needs assessments; and an understanding of number of households wishing to downsize and composition of the existing housing stock. It was also suggested that ‘small’ needs to be defined. Others suggested that suggest that the only appropriate mechanism for retaining entry level small dwellings is via Community Led Housing schemes and Affordable Homes, all of which will need to be covenanted and/or subjected to stringent planning conditions, so that they may not be sold into the open market and may not be extended or replaced with larger dwellings or that when considering future open market developments housing density could be used as the controlling criterion – terraced properties and dwellings with small outside spaces will be relatively unsuitable for extension and the question of permitted development will not arise. Other suggest that Local Needs Survey could provide evidence about the need or smaller homes, thus providing some evidence/justification. It was also suggested that consultation would need to be undertaken with the local communities prior to applying the any restrictions in order to explore whether they would be justified.</p>
<p><b>Main issue(s) raised:</b></p> <ul style="list-style-type: none"> <li>• Any restrictions to permitted development should be informed by Local Housing Needs Survey.</li> <li>• Further consideration should be given to the definition of ‘small’.</li> <li>• Community Led Housing and Affordable Homes are the only appropriate mechanisms for retaining entry level small dwellings.</li> </ul>
<p><b>Consultation question:</b> What do you think to the housing requirements for Local Service Centres and Large Villages? Should requirements be higher or lower? If so which ones and why?</p>
<p><b>Principal line(s) of argument:</b></p>

It was suggested that the method for calculating housing requirements and resulting figures do not seem to be based on clear evidence, therefore detailed methodology with stage-by-stage results should be published. The method should include factors such as the safety and capacity of the highway network, access to public transport, school capacity, retail/post office provision, access to health services, employment opportunities, Grade 1 and Grade 2 agricultural land, availability of sites for development, proximity to services and facilities in nearby settlements and how development can contribute to vibrancy of a village and support services and facilities. Others suggested that the method be simpler and based on percentage increase of the existing population.

It was suggested that the position of settlements in the hierarchy should be reviewed to consider changes since they were first identified, for example Winterslow, Redlynch and Morgan's Vale should be reclassified as Small Villages whilst Purton and Lynham should be reclassified as Local Service Centres. It was also suggested that as Durrington's population is significantly higher than other Large Villages it should at least be a Local Service Centre. There is no justification for changing its status of settlement from a Market Town. Also, Shaw and Whitley should not be considered as a single Large Village, therefore the housing requirement is disproportionate.

Comments relating to housing requirements were also received, such as the overall housing requirements allocated to Large Villages and Local Service Centres for each of the HMAs is too high and that growth should be directed to areas where it will serve to enhance the vitality of communities across the area to support both housing and economic growth. It was also suggested that the methodology is prejudicial against smaller Large Villages (LVs), imposing disproportionate levels of housing upon them – proposed housing requirements for many of the smallest Large Villages is greater proportionately than for some of the Local Service Centres. It was suggested that high residual housing requirements leave villages wide open for speculative development whilst housing requirements should be designated neighbourhood areas rather than settlements. Also, comments were received suggesting that commitments that match or exceed requirements imposes moratoria on further growth to 2036 at those settlements.

Comments received suggested that the Local Plan should allocate sites at Local Service Centres and Large Villages and not wait for Neighbourhood Plans or until site allocations plan is reviewed. Also, there should be time limits for how long Neighbourhood Plans will be given to allocate housing sites to meet their requirements.

**Main issue(s) raised:**

- The methodology for calculating housing requirements should be reviewed to include many further factors, including health, education, employment, transport, etc.
- The methodology should be simpler and based on population numbers.
- The settlement hierarchy should be reviewed, and certain settlements reclassified to reflect their current and future growth. Sufficient justification to reclassify a settlement should be based on sufficient evidence.
- The housing requirements and growth are disproportionate, for example some Large Villages have more growth than Local Service Centres.

- Requirements should be based on designated neighbourhood areas rather than settlements.
- High residual housing requirements leave villages wide open for speculative development.
- The Local Plan should allocate sites at Local Service Centres and Large Villages and not wait for Neighbourhood Plans. There should be time limits for how long Neighbourhood Plans will be given to allocate housing sites.

**Addressing climate change and biodiversity net gain**

6.10. A summary of comments from specific consultation bodies can be found within Table 9.

*Table 9: Provides a summary of comments from specific consultation bodies on the addressing climate change and biodiversity net gain paper.*

<b>Comments from specific consultation bodies</b>
<p><b>Natural England</b></p> <ul style="list-style-type: none"> <li>• Recognise the role of the natural environment to reduce the effects of climate change.</li> <li>• Supports the use of Sustainable Drainage Systems and recommends adopting higher standard of water efficiency.</li> <li>• Policies regarding green/blue infrastructure and biodiversity should contribute and enhance the natural and local environment. Plans should set out the approach to biodiversity net gain.</li> <li>• Consider providing a supplementary planning document (sustainable design and construction) that details guidance on how the relevant policies in the Wiltshire Local Plan will be applied to planning applications.</li> <li>• Supports the requirement for new housing and commercial development to include sustainable energy generation and policy for sustainable energy generation.</li> <li>• Recommends the Council put forward sites for renewable energy generation and assesses them under SA/SEA regulations and Habitats directives.</li> <li>• Assess traffic impacts, specifically air quality and Nitrogen emissions associated with new development, particularly impacts on European sites and SSSIs.</li> <li>• Plan positively for ecological networks and ensure appropriate policies to ensure protection of irreplaceable habitats.</li> </ul> <p><b>Environment Agency</b></p> <ul style="list-style-type: none"> <li>• Weave Water Sensitive Urban Design throughout the Local Plan</li> <li>• 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.</li> <li>• Recommend that SFRA Level 2 is considered for the large strategic allocations which are in proximity to flood zones 2 and 3.</li> <li>• 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’.</li> <li>• Recommend that the main rivers in the county should be considered as part of linear country park / open space.</li> <li>• When allocating new development sites advise that new buildings are located outside SPZ1 – the zone of highest vulnerability to pollution.</li> <li>• Strongly encourage the Council to be specific about water use standards in new development.</li> </ul>

- 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.
- Encourage a requirement of 20% biodiversity net gain.
- Include reference to Nature Recovery Networks – major commitment in the government’s 25 Year Environment Plan.
- Core Policy 69 needs to be updated to reflect the most recent agreement made between Wiltshire Council, the Environment Agency, and Natural England.

**Wilts and Berks Canal Trust**

- Policies should be ambitious to drive behavioural change and fully reflect the national objectives
- SUDs are not always sufficient on their own. Wider flood mitigation schemes and drainage schemes may give better protection to communities and rural areas. Canals can contribute to improvements and take flood water away.
- The regeneration of the Wilts and Berks Canal is important in creating wetland and terrestrial habitats, and significantly contributing to BNG. Furthermore, it will provide a sanctuary for health and wellbeing for visitors to the canal.
- The Council should support the highest possible standards for new builds and retrofit to any altered buildings, ensuring the highest performance outcome in reducing carbon emissions.
- Favouring and investing in all technologies with greener solutions will extend the opportunity to implement appropriate technology wherever commercially viable. However, it is vital to consider how reliable the technology is, any existing infrastructure in place, the surrounding land-use and the environmental impacts.
- The Wilts and Berks Canal will offer a safe route for active transport, allowing people to use the towpath as recreation. Additionally, the vegetation running alongside the canal acts as a natural carbon sequester, further providing clean air to its surroundings.

**Wessex Water**

- Wessex Water support the use of sustainable drainage systems (SuDS) to manage flood risk, sewer flooding and improve water quality and provide biodiversity and amenity benefits.
- The plan should support statutory infrastructure providers to achieve targets to achieve net zero carbon through policy support for control at source options, therefore we support the requirement for new development to limit daily consumption and disposal of water. To deliver on this aspiration the plan should identify the requirements it expects developments to meet.
- Development should be planned and located so that it does not impact upon Source Protection Zones surrounding our sources or reduce the amount of water that can be extracted from sources.
- Support the aspiration to enhance and create new GBI assets to act as a critical aspect of natural flood resilience.
- Carbon zero building policy needs to be flexible for infrastructure development.
- Wessex Water use installations using small scale renewables (typically small wind turbines or solar panels, at a microgeneration scale) to power telemetry and MCC (motor control centre) equipment supporting water supply and wastewater infrastructure. The infrastructure can be in rural locations and/or in sensitive landscapes. Support from the local

plan would be beneficial to ensure that planning consent can be gained for such installations which if located appropriately, would have minimal impact on sensitive landscapes/heritage designations.

**The Canal and Rivers Trust**

- The Canal & River Trust promote the use of canal water as a low/zero carbon energy source.
- The plan needs to be flexible to allow the use of all technologies as they become available or most cost effective in a rapidly changing world.
- The provision of charging points/moorings for electric boats should be considered in new waterside developments and in areas such as Devizes Wharf to allow boaters to move to a more sustainable energy source. This matter will require further discussion with the Canal & River Trust.
- Suggest that the Kennet & Avon canal could be used as a location for off-site net gain, with the agreement of the Canal & River Trust and sections of the Wilts & Berks canal could be delivered where a development needs off-site compensatory greenspace or habitat.

6.11. A summary of the main issues raised, against each consultation question, can be found within Table 10.

*Table 10: Provides a summary of comments, alongside main issues, on the addressing climate change and biodiversity net gain paper.*

<b>Consultation question: Tackling flood risk and promoting sustainable water management</b>
<p><b>Main issue(s) raised:</b></p> <ul style="list-style-type: none"> <li>• Flood risk from all sources should be reduced through an evidence-led assessment process</li> <li>• Proposals for new development:               <ul style="list-style-type: none"> <li>○ Must be safe from flood risk from all sources, including the cumulative effects of flood risk.</li> <li>○ Should incorporate multifunctional Sustainable Drainage Systems (wherever practicable) alongside natural flood management measures and nature-based solutions.</li> <li>○ Should include measures to significantly reduce water consumption (e.g. using a standard of 110ltr/day).</li> </ul> </li> <li>• Policies must be set for protection of water resources (e.g. Source Protection Zones).</li> <li>• Policies to include water retention/harvesting measures where practicable.</li> <li>• General concern regarding increased risk of flooding and climate change and how new development could exacerbate this.</li> <li>• Request for more natural floodplain management systems, integrating biodiversity gain and flood management; to be implemented at a strategic landscape scale.</li> </ul>

- The role of natural wetlands in absorbing nutrients needs to be highlighted in policy theme and built into the sustainable water management approach.
- A spatial strategy for biodiversity offsetting should be developed that commits sites for the purposes of long-term biodiversity net gain; to be woven into policy.

**Consultation question: Enhancing blue/green infrastructure and biodiversity**

**Main issue(s) raised:**

- Proposals for new development to be designed with sufficient, accessible, and interconnected open spaces.
- Trees form an integral element of design of new developments.
- Strategy for protecting and enhancing green/blue infrastructure should be linked to expanding the network of active travel routes (where practicable).
- Proposals for new development should deliver biodiversity net gains through comprehensive enhancement of existing habitats.
- Potential to go above and beyond 10% biodiversity net gain.
- Concerns that the consultation paper did not go far enough to address biodiversity protection.
- Concerns over proposed sites in particularly biodiversity rich areas.
- The need to link with the emerging green/blue infrastructure strategy.

**Consultation question: Delivering sustainable design and construction methods in the built environment**

**Main issue(s) raised:**

- Proposals for new development should utilise design features – such as choice of fabric, plot orientation, appropriate massing/density, and natural features – to adapt to and wherever practicable mitigate for the effects of climate change.
- All new residential and commercial developments should be built to zero carbon standards for energy efficiency.
- Some felt that proposals for delivering zero carbon standard developments can be achieved with limited or no impact to scheme viability; but developers questioned the ability to do so.
- Developer comments regarding not taking policy further than NPPF, due to viability concerns.
- Support for a Wiltshire Design Code.
- Issue of lifetime carbon rather than just operational.

**Consultation question: Encouraging sustainable renewable energy generation and management**

**Main issue(s) raised:**

- Proposals for new development should have the ability to link to the national grid with limited or no impact on scheme viability.
- Proposals for new development should reduce energy demand and consumption.
- Opportunities for small-scale and large-scale renewable energy schemes should be encouraged and where necessary planned for through allocations of land.
- Wiltshire Council should lead by example in the installation and delivery of renewable energy from all practicable sources.
- Council's 'policy' of not supporting large-scale wind energy schemes should be reversed.
- Greater capture of wind and solar energy should be planned for, subject to the satisfactory mitigation of environmental impacts.
- Greater encouragement and support for the installation of community renewable energy schemes.
- Exploring the opportunities around local heating schemes, particularly incorporating using waste for energy production.
- Encourage and support for new technology e.g. Hydrogen.
- Support for community energy initiatives.

**Consultation question: Promoting sustainable transport, active travel and improving air quality**

**Main issue(s) raised:**

- Opportunities for incorporating new Electric Vehicles (EV) charging points and hydrogen fuel refilling facilities should be fully explored and adopted.
- Proposals for new development should be in accessible locations to maximise opportunities for active travel.
- Opportunities for sustainable public transport schemes should be incorporated into major development schemes to encourage modal shift.
- All new development proposals should be adaptable and provide storage areas for bicycles and clothes drying facilities.
- Changes to working arrangements due to pandemic should be factored into the design of new residential and commercial buildings.
- Conflict regarding promoting sustainable transport and the building of new roads – particularly Chippenham.

**Consultation question: Further comments**

**Main issue(s) raised:**

- Loss of agricultural land and concerns regarding food security.
- Ensuring developments are located close to supporting infrastructure and employment to prevent car dependent developments.
- Potential to introduce requirement of Climate Change Impact Assessments for new developments.
- Innovation and flexibility in policies to incorporate new technology.
- Pedestrianisation/traffic free zones/low emission zones.
- Many developers stated policies need to be commercially viable, not prescriptive. Other groups stated policy needs to go beyond national policy.
- Ensure standards do not affect housing affordability.

**Planning for Amesbury**

6.12. A summary of comments from specific consultation bodies can be found within Table 11.

*Table 11: Provides a summary of comments from specific consultation bodies on the planning for Amesbury paper.*

<b>Comments from specific consultation bodies</b>
<p><b>Natural England</b></p> <ul style="list-style-type: none"> <li>Concerned by any development on Site 2 as the site supports mixed areas of Priority Habitats (Deciduous Woodland and Lowland Fen). Also outlined that Site 3 has potential to be high quality Agricultural Land Classification Grade 3.</li> </ul> <p><b>Environment Agency</b></p> <ul style="list-style-type: none"> <li>Commented that Amesbury is within the River Avon catchment which is currently failing protected area and Water Framework Directive objectives because of elevated phosphorous.</li> </ul> <p><b>Sport England</b></p> <ul style="list-style-type: none"> <li>Support the priority to improve recreational facilities and sports pitches in Amesbury. There should be greater emphasis on health.</li> </ul> <p><b>Wessex Water</b></p> <ul style="list-style-type: none"> <li>Preference made to Site 1 and Site 3 as seeming the most appropriate for connections to water services. Site 2 is adjacent to sewage treatments works with a risk of reduced amenity due to fly and odour issues.</li> </ul> <p><b>Highways England</b></p> <ul style="list-style-type: none"> <li>Sites 1 and 2 are next to the A303, therefore there are potential noise and air quality issues which will need mitigating alongside any other impacts in the integrity of the asset.</li> <li>The construction of the A303 Stonehenge scheme may offer some relief to congestion issues experienced on the A303 and A345.</li> </ul> <p><b>Historic England</b></p> <ul style="list-style-type: none"> <li>Support the development of brownfield sites.</li> <li>Proposals should respond to the historic environment, the town’s history, character, below round archaeology, and landscape setting to ensure Amesbury’s significant historic landscape context and proposed expansion.</li> </ul>

6.13. A summary of the main issues raised, against each consultation question, can be found within Table 12.

Table 12: Provides a summary of comments, alongside main issues, on the planning for Amesbury paper.

<p><b>Consultation question AM1:</b> What do you think to the scale of growth? Should there be a brownfield target?</p>
<p><b>Principal line(s) of argument:</b></p> <p>The scale of growth received a mixed response. Some noted that it is broadly appropriate, whilst those believing the scale of growth too high noted concerns around recent growth at the town. Specifically, the Army Basing Programme and development at Archers Gate and Kings Gate. Concerns were that these have filled the towns 'quota' of growth; a lack of sufficient infrastructure; and lack of consideration given to local factors. Others suggested that the scale of growth is increased because the town serves neighbouring areas as well as local residents and especially if the plan period is extended to 2040.</p> <p>The decision to separate Amesbury from Bulford and Durrington is generally supported, however it is suggested that further clarification is needed about the future housing requirement for each independent settlement to encourage development of each community by considering each settlement's roles rather than taking the collective approach of the WCS.</p> <p>The brownfield target generally received comments noting the need to prioritise the land for development in preference to greenfield sites, but it is suggested that Amesbury has limited brownfield sites. Other comments cited the need for more detailed assessment on the deliverability and reliability of developing brownfield land which is uncertain and difficult to predict. A suggestion was made to delete the brownfield target and instead include a policy to encourage the redevelopment of brownfield sites. Suggestions were made for brownfield land to include changes to retail and office buildings.</p>
<p><b>Main issue(s) raised:</b></p> <ul style="list-style-type: none"> <li>• The separation of Amesbury, Bulford and Durrington as distinct settlements was broadly supported.</li> <li>• Growth believed by some to be too high given Amesbury's constraints and amount of development the town has experienced in recent years.</li> <li>• Growth believed by some to be too low given Amesbury's role in supporting surrounding settlements.</li> <li>• Brownfield land opportunities need to be assessed to understand the deliverability and reliability of developing brownfield land.</li> </ul>
<p><b>Consultation question AM2:</b> Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?</p>
<p><b>Principal line(s) of argument:</b></p>

Comments made generally agree with the place shaping priorities. However, concerns were raised that self-sufficiency not only requires encouraging residents to work in the town but retail, leisure, health, and education infrastructure that is accessible to the residents to balance development and infrastructure. Health services, education provision and retail provision are both felt to be limited at present. A need for more jobs was raised.

Additional priorities were given as supporting the future development of Porton Down and Boscombe Down and the potential integration of Boscombe Down and Amesbury.

Land South West of Amesbury was promoted as potentially large enough to deliver/facilitate several priorities through the provision of new infrastructure. While Site 3 was proposed as large enough to provide mixed use development, including land for employment.

**Main issue(s) raised:**

- The priorities could also support health and education infrastructure improvements, as well as new retail and employment provision.
- Consideration could be given to integrating Boscombe Down and Amesbury and supporting the future development of Boscombe Down and Porton Down.
- The site promoters for both Land South West of Amesbury and Site 3 suggest the sites could support the delivery of place shaping priorities.

**Consultation question AM3:** Is this the right pool of potential development sites?

**Principal line(s) of argument:**

Concerns were raised regarding all three sites, in particular their proximity to the UNESCO World Heritage Site. These are also within 6,400m of the Salisbury Plain Special Protected Area (SPA), increasing recreational pressures on the SPA, requiring mitigation.

Concerns were raised with the proximity of sites 1 and 2 to the A303 and potential impact on residential amenity both in terms of visual impact, pollution (noise/fumes) and potential flooding issues. The proximity of Site 3 to Boscombe Down also raised concerns.

The Ministry of Defence raised concerns about the proximity of Site 3 to Boscombe Down Aerodrome and Technical Safeguarding Zones and Explosives Storage Safeguarding Zone which could effectively eliminate certain MOD operations; requesting that Site 3 is removed from further consideration.

<p>The consultation received submissions for four additional sites including Land South West Amesbury, High Post Business Park, West of A345 to the South of High Post and Hackthorne Road, Durrington.</p>
<p><b>Main issue(s) raised:</b></p> <ul style="list-style-type: none"> <li>• Impact of development on the UNESCO World Heritage Site and pressure on existing infrastructure.</li> <li>• Major constraints raised at the three sites consulted on.</li> <li>• Additional sites were submitted by landowners/developers.</li> </ul>
<p><b>Consultation question AM4:</b> What land do you think is the most appropriate upon which to build?</p>
<p><b>Principal line(s) of argument:</b></p> <p>The theme of prioritising the development of brownfield land is considered most appropriate. Suggestion was made to remove the brownfield target from the Plan and instead include a policy to encourage the redevelopment of brownfield sites.</p> <p>Site specific comments:</p> <ul style="list-style-type: none"> <li>• <b>Comments relating to Site 3 (Land Adjacent to Stockport Road and Land at Stock Bottom):</b> Noted the site can deliver mixed-use development (residential/employment land). Infrastructure requirements for the site are likely to be limited noting the close proximity of the new round about on the A345 and providing close connection to the strategic road network and public transport.</li> </ul>
<p><b>Main issue(s) raised:</b></p> <ul style="list-style-type: none"> <li>• The prioritisation of brownfield land assessment prior to allocating greenfield land for development</li> <li>• There is a need for infrastructure delivery on selected sites.</li> </ul>
<p><b>Consultation question AM5:</b> 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?</p>
<p><b>Principal line(s) of argument:</b></p> <p>Comments raised included the effects of the pandemic, a move towards a Net Zero economy and home working changing the needs of the population and shape requirements for Amesbury.</p> <p>Housing provision should be tailored to the needs of the area. A neighbourhood plan was identified as the most appropriate vehicle for housing development.</p>

Comments suggested other factors, including impact on the historic environment; pollution caused by additional cars resulting from new development; the strong links between Amesbury and military establishments; the growth of technology parks at Boscombe Down and Porton Down; transport; biodiversity; health facilities/provision; improvements to retail; and landscape protection.

**Main issue(s) raised:**

- Protection of the historic character and significant heritage of the landscape Amesbury sits within.
- A need to balance housing and employment and consider the future needs of the town following the pandemic.
- Recognition needed of the strong links between Amesbury and the surrounding MOD operations and growth of the associated technology parks.

**Consultation question AM6:** Are there any issues or infrastructure requirements that should be identified?

**Principal line(s) of argument:**

Comments raised several infrastructure concerns, focusing upon the impact of growth on existing infrastructure and need to provide improved infrastructure to support further planned development. Particularly, these are educational capacity, the highway network, healthcare facilities, retail and employment.

Local bus company, Stagecoach support development on Land South West Amesbury, as it could underpin delivery of public transport infrastructure.

**Main issue(s) raised:**

- The ability of Amesbury's existing infrastructure (transport, educational, healthcare, retail) to accommodate further residential development.

**Planning for Bradford on Avon**

6.14. A summary of comments from specific consultation bodies can be found within Table 13.

*Table 13: Provides a summary of comments from specific consultation bodies on the planning for Bradford on Avon paper.*

<b>Comments from specific consultation bodies</b>
<p><b>Natural England</b></p> <ul style="list-style-type: none"> <li>• The impact of proposed development on air quality should be assessed</li> <li>• Concerned about the potential loss of green infrastructure from proposed development</li> </ul> <p><b>Sport England</b></p> <ul style="list-style-type: none"> <li>• Objects to Site 3 (golf course) unless the golf course is shown to be surplus to requirements, or alternative provision is made elsewhere</li> </ul> <p><b>Wessex Water</b></p> <ul style="list-style-type: none"> <li>• No serious water management constraints currently identified in Bradford on Avon</li> <li>• Moderate amount of development on each site would lead to the least possible amount of possible reinforcement of the water network</li> </ul>

6.15. A summary of the main issues raised, against each consultation question, can be found within Table 14.

*Table 14: Provides a summary of comments, alongside main issues, on the planning for Bradford on Avon paper.*

<b>Consultation question BR1: What do you think to the scale of growth? Should there be a brownfield target?</b>
<p><b>Principal line(s) of argument:</b></p> <p>The scale of growth received a mixed response, some supporting it if delivered on brownfield sites determined by the neighbourhood plan. Those believing the scale of growth too high noted concerns around the capacity of local infrastructure and the potential for environmental harm, including air quality concerns. Others questioned whether it should be higher citing the range of services and facilities within the town and a high level of affordable housing need.</p>

<p>The brownfield target generally received comments noting that the town does not have a good supply of previously developed land and therefore questioning the role of a brownfield target. It was also argued that the delivery of small-scale infill development within the existing settlement boundary will not meet the need for affordable homes.</p>
<p><b>Main issue(s) raised:</b></p> <ul style="list-style-type: none"> <li>• The scale of growth should take into account the affordable housing need but be mindful of infrastructure and environmental concerns.</li> <li>• Brownfield land needs to be assessed to understand its ability to contribute towards the affordable housing need.</li> </ul>
<p><b>Consultation question BR2:</b> Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?</p>
<p><b>Principal line(s) of argument:</b></p> <p>Comments noted topics that people wish to see reflected in more detail in the priorities, including affordable housing, the transport network in and around the town, the climate emergency, green space, biodiversity, heritage, landscape, and infrastructure. Other priorities identified for the town included affordable housing and a pedestrian/ cycle bridge across the River Avon.</p> <p>Many responses questioned why the employment and economy are priorities, yet no provision is made for additional employment land at the town.</p>
<p><b>Main issue(s) raised:</b></p> <ul style="list-style-type: none"> <li>• Re-evaluate priorities providing more locally specific detail for the identified priorities but consider others, such as the climate emergency, green space and biodiversity, landscape, infrastructure, and transport improvements.</li> <li>• Ensure that the place-shaping priorities carry through to the rest of the plan, e.g. site allocations</li> </ul>
<p><b>Consultation question BR3:</b> Is this the right pool of potential development sites?</p>
<p><b>Principal line(s) of argument:</b></p> <p>There was some support for the sites identified through the neighbourhood plan. There was a significant level of objection to all three sites, particularly Site 3 (the golf course). There was a preference for Site 2 out of the three, though some argued that only a small part of the site might have potential for development.</p>

Other alternatives suggested included sites at the Football Ground, North of Poulton Lane, land parcels off Bath Road, Leigh Road West, Winsley Road and Trowbridge Road (to the rear of the Beehive). All except the Football Ground are within the Green Belt.
<p><b>Main issue(s) raised:</b></p> <ul style="list-style-type: none"> <li>• Effect on and contingency for existing uses of sites within the pool of sites if development goes ahead, e.g. golf course, allotments</li> <li>• Implications for plan-making of most alternative site suggestions being located within the Green Belt.</li> <li>• Additional sites were submitted by landowners/developers.</li> </ul>
<p><b>Consultation question BR4:</b> 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><b>Principal line(s) of argument:</b></p> <p>The themes of neighbourhood plan-led development and the prioritisation of affordable housing stand out. There are concerns that the town does not have a good supply of brownfield land to meet development needs. Indeed, most alternative site suggestions were within the Green Belt.</p> <p>Site specific comments:</p> <ul style="list-style-type: none"> <li>• <b>Comments relating to Site 1 (allotments)</b> – not formally promoted but development suggested in combination with Site 2, with allotments relocated within Site 2.</li> <li>• <b>Comments relating to Site 2 (land north of Holt Road)</b> – actively promoted and slightly preferred ahead of sites 1 and 3</li> <li>• <b>Comments relating to Site 3 (golf course)</b> – received significant objections to development of valued community space. Also actively promoted.</li> </ul> <p>Concerns about the impact of Covid-19 and the future of the town linked to suggestions that homes could be provided by converting vacant retail units.</p>
<p><b>Main issue(s) raised:</b></p> <ul style="list-style-type: none"> <li>• Limited supply of brownfield land in the town and most suggested alternative sites lying within the Green Belt</li> <li>• The importance of existing community uses on most sites within the pool of sites</li> </ul>

<p><b>Consultation question BR5:</b> 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?</p>
<p><b>Principal line(s) of argument:</b></p> <p>A range of topics were raised in relation to important social, economic or environmental factors, including affordable housing, the Climate Emergency, biodiversity, heritage, landscape setting, infrastructure constraints, employment land provision, air quality and transport improvements.</p>
<p><b>Main issue(s) raised:</b></p> <ul style="list-style-type: none"> <li>• The importance of providing affordable housing and protecting the character of Bradford on Avon.</li> </ul>
<p><b>Consultation question BR6:</b> Are there any issues or infrastructure requirements that should be identified?</p>
<p><b>Principal line(s) of argument:</b></p> <p>While comments raised several infrastructure concerns, many focussed upon the need for affordable housing, transport improvements such as a pedestrian/ cycle bridge over the River Avon and a bypass, and green infrastructure and biodiversity provision. Other topics included the need to protect existing community uses and employment land provision.</p>
<p><b>Main issue(s) raised:</b></p> <ul style="list-style-type: none"> <li>• The ability of Bradford on Avon's transport, employment land stock and diversity network to accommodate further residential development, and the need for affordable housing.</li> </ul>

**Planning for Calne**

6.16. A summary of comments from specific consultation bodies can be found within Table 15.

*Table 15: Provides a summary of comments from specific consultation bodies on the planning for Calne paper.*

<b>Comments from specific consultation bodies</b>
<p><b>Natural England</b></p> <ul style="list-style-type: none"> <li>• Concerns regarding potential cumulative effects of developing several sites to the east of Calne on the setting of the North Wessex Downs AONB</li> <li>• Site 4, if developed as a whole, represents a major encroachment on the boundary of the North Wessex Downs AONB and impacts are unlikely to be mitigated. This could pose significant harm to the characteristics of the AONB</li> </ul> <p><b>Historic England</b></p> <ul style="list-style-type: none"> <li>• Support efforts to prioritise all potential brownfield opportunities, including repurposing existing vacant sites, or underused buildings of historic interest to help reinforce and enhance the character of the town</li> <li>• A strategic understanding of the history, character and landscape setting should inform the spatial distribution, capacity and specific allocations proposed</li> </ul> <p><b>Wessex Water</b></p> <ul style="list-style-type: none"> <li>• Services to the west of Calne have more potential spare capacity. Services to accommodate the current East of Calne developments have been stretched to serve more development than originally proposed. Although further development in this area could lead to significant improvements</li> <li>• Site 4 is within the odour and flies consultation zone for Compton Bassett Sewage Treatment Works</li> </ul> <p><b>Sport England</b></p> <ul style="list-style-type: none"> <li>• There should be a target of creating a healthy, inclusive sustainable town</li> </ul>

6.17. A summary of the main issues raised, against each consultation question, can be found within Table 16.

*Table 16: Provides a summary of comments, alongside main issues, on the planning for Calne paper.*

<b>Consultation question CA1: What do you think to the scale of growth? Should there be a brownfield target?</b>
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<p><b>Principal line(s) of argument:</b></p> <p>The scale of growth proposed at Calne, with a relatively low residual amount to meet over the plan period, received a mixed response. Some highlighted that Calne is already delivering a large number of new homes and should not need to deliver more. Others stated that the residual amount is so low that new infrastructure such as improvements to services and facilities or an eastern bypass, could not be delivered, and few affordable homes would be delivered. There were many comments in support of a new bypass to the east of the town, linking Oxford Road with the A4 at Quemerford.</p> <p>There was general support for a higher brownfield target noting the need to prioritise brownfield land for development in preference to greenfield sites. There was support for the neighbourhood plan undertaking a detailed assessment of the capacity of brownfield sites.</p>
<p><b>Main issue(s) raised:</b></p> <ul style="list-style-type: none"> <li>• Calne is not significantly constrained in environmental terms and could deliver a higher level of growth.</li> </ul>
<p><b>Consultation question CA2:</b> Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?</p>
<p><b>Principal line(s) of argument:</b></p> <p>On the whole, the priorities were supported but some questioned how they are going to be achieved. There were a significant number of comments highlighting topics and problems that need to be prioritised, the main ones being: town centre regeneration and increasing the number of shops, pubs, amenities and GP and dental surgeries, ensuring climate change considerations are included in growth proposals, biodiversity enhancement, linking the Wiltshire Local Plan with the priorities in the Calne Community Neighbourhood Plan, protecting the towns character (particularly landscape and biodiversity), and meeting a range of housing needs, particularly for older people and affordable homes.</p>
<p><b>Main issue(s) raised:</b></p> <ul style="list-style-type: none"> <li>• Meeting a range of housing needs, ensuring housing growth is accompanied by the early provision of employment land.</li> <li>• Facilitating infrastructure improvements such as an eastern bypass delivery, alleviating traffic congestion and associated air quality concerns, primary school capacity, healthcare facilities and open space provision including allotment land and cemetery space.</li> <li>• Addressing the lack of town centre services, facilities and amenities, including shops, pubs, GP and dental surgeries.</li> </ul>
<p><b>Consultation question CA3:</b> Is this the right pool of potential development sites?</p>

**Principal line(s) of argument:**

There were various comments either supporting or objecting to different sites around Calne. Some argued that no more housing sites are needed, whilst others argued that only brownfield sites should be considered. Developers and landowners expressed support for sites that they were promoting, arguing that their sites were more sustainable than others. Many residents objected to potential allocations near to where they live, with some arguing that sites in other parts of the town would be preferable. Some consultees suggested that sites that were not included in the pool of sites should be reconsidered for inclusion. Preference was noted that sites should be chosen that have good access to the transport network and employment areas within Calne.

Calne Without Parish Council consider it would be appropriate to examine the feasibility of developing sites that would bring together existing new development on the edge of town

Other comments focussed on constraints impacting upon sites, namely landscape (AONB), biodiversity, traffic impacts and flood risk. This fell alongside a range of other site-specific comments noting a series of reasons for and against development. It was noted that, given past delivery rates of new homes on brownfield land, it is considered unlikely Calne's housing needs can be met in full using brownfield land.

Details of new sites for further consideration were received for i) land at Atwell Wilson Motor Museum ii) land North of Low Lane and iii) land at Woodbine Cottages

**Main issue(s) raised:**

- Concerns about the cumulative impacts of developing sites on the setting of the North Wessex Downs AONB, designated heritage assets, landscape character, ecology and environmental constraints of the local area they sit within.
- Preference for synergy with the aspirations of Calne Community Neighbourhood Plan.
- Site 4 considered to be very large and if developed should provide for an eastern bypass linking Sand Pit Road/Oxford Road with the A4 at Quemerford

**Consultation question CA4:** What land do you think is the most appropriate upon which to build?

**Principal line(s) of argument:**

Prioritising the development of brownfield land first before greenfield was a common theme, the Co-op often mentioned as a suitable brownfield site. Some residents felt that no more land should be allocated for housing whilst others felt that sites on the other side of town would be more appropriate. Landowners and developers considered that the sites they are promoting would be the most

appropriate upon which to build. Some respondents felt that it should be left up to the neighbourhood plan to decide which land was most appropriate.

Site specific comments:

- **Comments relating to Site 2 (Land west of Spitfire Road) and Site 3 (Land east of Spitfire Road)** – representations received on SHELAA sites 3610 and 488, 489 and 3168. Sites promoted together for approx 600 dwellings plus a new local centre
- **Comments relating to Site 4 (Land north of Quemerford)** – representations received on land at Quemerford Farm, including part of SHELAA site 1104a (including the westernmost and southernmost parts closest to the urban edge) as well as the entire SHELAA site 1104b. Representations also received on land South of Low Lane (part of SHELAA site 1104a) and further representations on SHELAA sites 3642/3643
- **Comments relating to Site 6 (Rookery Farm)** – representations received on SHELAA site 3254 stating site has potential for up to 30 dwellings
- **Comments relating to Site 7 (Land off Wenhill Lane)** - representations received on SHELAA sites 709, 3251, 3311 and 3312 stating site has potential for circa 200 dwellings
- **Comments relating to Site 8 (Land south of Chilvester Hill)** – representations received on SHELAA site 3172

**Main issue(s) raised:**

- Site 4 has good access to the A4 and could facilitate an eastern bypass which could help alleviate town centre traffic congestion
- Sites 2, 3 and 4 would keep development relatively within the town boundary, helping to reduce sprawl, and be close to employment areas
- Preferences noted for sites aiding town centre regeneration

**Consultation question CA5:** 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?

**Principal line(s) of argument:**

A range of important social, economic and environmental issues were raised in relation to the future growth of Calne. These included:

- Lack of employment land accompanying housing growth
- Need for affordable homes for young people and young families

<ul style="list-style-type: none"> <li>- Traffic congestion and air quality issues in the town centre</li> <li>- Protecting the countryside, wildlife and areas of open space around the edge of Calne</li> <li>- Flood risk</li> <li>- Lack of amenities in the town centre alongside a lack of GP and dental surgeries in the town</li> <li>- The impacts of the COVID-19 pandemic were noted in relation to changes in work patterns</li> <li>- Protect and enhance wildlife and biodiversity through net gain, including widespread planting of trees</li> <li>- Development should be within a reasonable walking distance of the town centre to reduce the need to use cars and reduce congestion</li> </ul>
<p><b>Main issue(s) raised:</b></p> <ul style="list-style-type: none"> <li>• Employment allocations should accompany any new housing.</li> <li>• A new Calne A4 to Sandpit Road relief road (eastern bypass) is needed</li> <li>• Need for any new development to aid in town centre regeneration, including more amenities and healthcare facilities</li> </ul>
<p><b>Consultation question CA6:</b> Are there any issues or infrastructure requirements that should be identified?</p>
<p><b>Principal line(s) of argument:</b></p> <p>There were many comments on a range of infrastructure concerns. The main lines of argument included:</p> <ul style="list-style-type: none"> <li>- Concerns surrounding the ability of utility companies to suitably service any future growth</li> <li>- A lack of facilities and amenities in the town centre for a town the size of Calne</li> <li>- Lack of GP surgeries/healthcare provision</li> <li>- Town centre traffic congestion, air quality concerns and a desire for improved town connectivity for cyclists and pedestrians</li> <li>- Loss of wildlife and areas of open space that are important for resident's mental and physical wellbeing.</li> <li>- Need for investment in high-speed broadband and communications to allow for increased levels of homeworking, especially in the rural areas</li> </ul>
<p><b>Main issue(s) raised:</b></p> <ul style="list-style-type: none"> <li>• The ability of Calne's transport, educational and healthcare infrastructure to accommodate further residential development</li> <li>• The ability of water companies to provide sufficient infrastructure for significant new development to the east of Calne</li> <li>• A relief road from the A4 to Sandpit Road should be considered</li> </ul>

**Planning for Chippenham**

6.18. A summary of comments from specific consultation bodies can be found within Table 17.

*Table 17: Provides a summary of comments from specific consultation bodies on the planning for Chippenham paper.*

<b>Comments from specific consultation bodies</b>
<p><b>Environment Agency</b></p> <ul style="list-style-type: none"> <li>• 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.</li> <li>• The opportunity to provide a longer length of River Park through the town and beyond should be looked at, including options to replace radial gate, for the benefit of biodiversity, amenity and flood risk. The Environment Agency is currently looking at the long-term future of the radial gate in Chippenham.</li> </ul> <p><b>Historic England</b></p> <ul style="list-style-type: none"> <li>• Prioritisation of brownfield land supported but must be designed sensitively to historic environment. 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.</li> </ul> <p><b>Natural England</b></p> <ul style="list-style-type: none"> <li>• Site 1 Consider Agricultural Land Classification – The site includes soil graded as best and most versatile (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.</li> </ul> <p><b>NHS Property Services</b></p> <ul style="list-style-type: none"> <li>• Promoting Land and buildings 49,51 &amp; 53 Rowden Hill, Chippenham Hospital, Chippenham for future development. The sites lie to the west of the main Chippenham Community Hospital Site.</li> </ul> <p><b>Sport England</b></p> <ul style="list-style-type: none"> <li>• Suggests the creation of a healthy, inclusive sustainable town can be achieved through use of the Sport England and Public Health England ‘Active Design’ guidance</li> <li>• Site 6 causes some concern if it is taken forward. Should not negatively impact on the adjacent sports ground at Chippenham Rugby and Football club.</li> </ul> <p><b>Wessex Water</b></p>

- The scale of development is significant and will require major investment in networks, treatment and possibly water resources. Sewage treatment works in south Chippenham option may need to be expanded and as such residential development would need to be at appropriate distance.

**Wilts and Berks Canal Trust**

- Wilts and Berks Canal Trust considers that provision of canal should be integrated into site proposals and construction secured as green and blue corridor with walking/cycling routes.

6.19. A summary of the main issues raised, against each consultation question, can be found within Table 18.

*Table 18: Provides a summary of comments, alongside main issues, on the planning for Chippenham paper.*

<b>Consultation question CP1:</b> What do you think to the scale of growth? Should there be a brownfield target?
<p><b>Principal line(s) of argument:</b></p> <p>There was a significant level of objection to the proposed level of growth citing it to be too high, placing too much strain on the town’s infrastructure and leading to the town becoming too large. Concerns were raised regarding the potential for proposals to increase out-commuting, increase traffic congestion, and increase air/noise pollution. Concerns were also raised regarding the potential impacts on availability of greenspace, and impacts on cycleways. The ability for the proposals to address climate change was also a key concern, as well as loss of agricultural land. There were many requests to prioritise redevelopment of brownfield land and to distribute the housing to other towns and villages. There were some objections on the grounds that it was perceived that the council’s bid under the Housing Infrastructure Fund (HIF) had predetermined the scale of growth for Chippenham.</p> <p>Parish Councils objected to the proposed level of growth and said not enough evidence has been provided to justify the figures. They supported having a brownfield target but suggested it should be higher and there should be an ambitious approach to prioritising the use of brownfield land.</p> <p>Developers supported Chippenham as the focus for growth but there was mixed support for the brownfield target, and they questioned the deliverability of a high number of dwellings as well as existing allocations within the plan period.</p>
<b>Main issue(s) raised:</b>

- Concern that Chippenham is becoming too large and lacks infrastructure, housing numbers considered to be beyond Chippenham's needs. HIF bid perceived to pre-determine scale of growth.
- Brownfield target implies loss of substantial employment land/space, undermining jobs and homes balance - increasing out commuting (carbon use) and congestion.
- Excessive loss of countryside and resultant impact; contradicts climate emergency declaration.

**Consultation question CP2:** Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?

**Principal line(s) of argument:**

There was mixed support for the priorities. Some comments suggested there was no need for additional employment land (Priority 1), whilst some felt the impact of COVID-19 on the town centre should be considered (Priority 2). There was significant support for green infrastructure including the river corridor (Priority 3), with some comments requesting prioritisation of maintaining separation between surrounding villages (e.g. Tytherton Lucas, Stanley), and protecting the River Marden and North Rivers Cycle Route. There were significant objections to the priority promoting a new road to link the A4 with the A350 (Priority 5), with some commenting that a road to the east of Chippenham would not ease congestion, and some expressing a preference for the road to the south of Chippenham.

Others noted that priorities could better reflect the conservation of the historic environment, while concerns were raised that the priorities do not adequately address sustainable development, climate change, renewable energy, green space, air quality and congestion, community infrastructure and town centre investment. Synergy with the aspirations of the emerging Chippenham neighbourhood plan was noted as an important consideration. There was concern that the priorities are designed to support the two urban extensions, rather than to address deficiencies in lack of leisure and retail facilities.

**Main issue(s) raised:**

- Priorities are considered to support new sites, rather than to address lack of leisure and retail in Chippenham or adverse effects of development on surrounding parishes.
- Protection of the Marden River should also be a priority, as well as the Avon and the North Rivers Cycle route.
- Concern that the priorities do not address sustainable development, climate change, renewable energy, green space, air quality and congestion, community infrastructure and town centre investment.

**Consultation question CP3:** Do you agree these sites are the most appropriate upon which to build? If not, why not?

**Principal line(s) of argument:**

There were significant objections to the preferred sites. Many objections raised concern that Site 1 is in Bremhill parish and is not supported by the Bremhill Neighbourhood Plan. There were also objections to the Future Chippenham development and HIF proposals with some suggesting the sites had been selected for commercial reasons (Wiltshire Council owned land) to coincide with the road route and support the business case for a new road. There were requests to retain farmland / County Farms on the sites, prioritising local food production and to protect wildlife habitat in the Avon and Marden Valley. Concerns were also raised about southward expansion of Chippenham due to impacts on wider landscape setting of Lacock village and its historic assets.

There was some support for alternative site options, particularly west of A350. Comments were also received that an alternative mix of sites should be considered based on a lower quantum and benefiting from public transport.

Others noted that greater clarity was needed on how impact on historic environment has influenced the site selection, with some requesting that new economic evidence be provided to consider impact of COVID-19 and inform balance of jobs to homes to inform requirement for employment land. It was noted by some that proposed economic development will help redress out-commuting and support town centre, and some support for the sites proposed. It was noted that a lack of progress on the development of Rawlings Green will impact on delivery of the east Chippenham site. It was also requested that consideration be given to the completion of a hospital link road instead of a southern link road.

Objections were raised on the basis that the Sustainability Appraisal site criteria was considered to be biased and the methodology resulted in dismissing other site options which would not require costly carbon intensive infrastructure, and that a new road, including two river crossings and a railway bridge, would not be required without the large number of homes being proposed. Concerns about impacts on the town and damage to the local environment were also raised. A petition was received seeking some fields in Site 1 to be designated as local greenspace. There was also disappointment expressed that no brownfield or town centre sites were included as options despite opportunity to improve town character and vibrancy.

Developers of preferred sites were generally supportive; but raised objections on specific points, particularly place shaping priorities and concept plan layouts. All developers are seeking to maximise residential use on their land and are less supportive of providing other uses e.g., employment, schools, renewable energy, greenspace. Some submitted that their land could accommodate more housing, with some comments that employment land locations would be better located nearer to the A4 and/or A350. Developers for other options consider their sites should be preferred as they do not involve major infrastructure and are capable of early delivery - they challenge the sustainability appraisal and the site methodology including place shaping priorities. The allocation of Langley Park as a brownfield site was also promoted, along with the promotion of additional land at the existing Rawlings Green allocation, and the promotion of an extension to employment land around the M4 Junction 17.

**Main issue(s) raised:**

- Widespread objection from the public and town/parish councils to the proposed sites.

- Concerns raised regarding the compatibility of the proposed development site with the Bremhill Neighbourhood Plan.
- Concerns regarding the justification for a new road; some preference expressed for the completion of the hospital link road instead of the southern link road.
- Comments that a lack of progress on the delivery of Rawlings Green will impact on delivery of east Chippenham site.
- New economic evidence is needed to consider impact of COVID-19 and inform balance of jobs to homes - question need for employment land; retail and offices should be converted into homes.
- Some developer suggestion that more housing can be accommodated north of the North Rivers Cycle Route (Site 1 New Leaze Farm); this has closer links with the town centre than other parts of the site.
- Employment land considered to be would be better located nearer to A4 and/or A350;
- Further site options submitted.

**Consultation question CP4:** What are the most important aspects to consider if these sites are going to be built on?

**Principal line(s) of argument:**

There were significant objections to the sites identified, with many saying there shouldn't be any development at all on these sites. The important aspects listed included amenities; local schools and services; greenspace; carbon neutral development; walking and cycling; good design; and biodiversity net gain.

It was requested that Hardens Mead should not be utilised as an access way into Site 1; and that the settings of the rivers and canal should be protected from development. It was also suggested that the town centre roads should be improved before any new development and there should be no increase to congestion. It was also raised that the Bridge Centre site should be redeveloped.

**Main issue(s) raised:**

- Important aspects include amenities; local schools and services; greenspace; carbon neutral development; walking and cycling; good design; and biodiversity net gain.
- The rivers and canal should be protected from development.
- Improve town centre roads before any new development and don't increase congestion on existing roads.
- Redevelop the Bridge Centre site.

**Consultation question CP5:** How can these concept plans be improved?

**Principal line(s) of argument:**

There were significant objections to the sites identified. Some comments suggested using brownfield land in the town instead. Some comments suggested reducing the level of housing and gave suggestions as to other uses to consider as part of any proposals e.g. entertainment and leisure facilities. Some comments objected to the proposed road and layout. It was commented that any development should be contained within the boundary of the new link road with a long-term commitment to protect the land outside this boundary from further development. A petition was received seeking some fields in Site 1 to be designated as local greenspace. It was requested that a comprehensive review of traffic implications is carried out, along with a fully funded mitigation strategy developed to ensure there is no adverse impact on surrounding communities and roads. Concern was also raised that the evidence base lacks a detailed heritage assessment.

Developers of land within preferred sites were generally supportive; but raised objections on specific points including concept plan layouts. All developers were seeking to maximise residential use on their land and were less supportive of providing other uses e.g., employment, schools, renewable energy, greenspace. Some developers commented on the evidence base.

**Main issue(s) raised:**

- Concern that development will be on land within the floodplain.
- Loss of countryside, landscape impacts and the associated pollution both in noise and traffic.
- Concerns about traffic impacts on local roads.
- The evidence base lacks a detailed heritage assessment.

**Consultation question CP6:** Do you agree with the range of uses proposed, what other uses should be considered?

**Principal line(s) of argument:**

A significant number of objections object to the proposals, many saying the sites should be retained as green fields. Some suggested there was no need for some of the infrastructure e.g., local schools are not full. Other comments suggested new uses including services, leisure uses, shops and transport measures. Two parish councils suggested that the employment land would be more appropriately located nearer to the A350 with access to the M4 and the amount of employment land was not high enough to ensure the local population can live and work in the area. Chippenham Town Council noted that infrastructure, renewable energy, green buffer, local green spaces, walking and cycling routes, sustainable building construction and biodiversity net gain are considered to the most important aspects. Concerns were also raised by the town council about impacts on villages, and commented that walking/cycling links with existing network, urban area, town centre and transport modes should be provided.

<p>Some developers agreed with the uses proposed, but some developers disagree with the distribution of uses across the sites between different landowners with no clear rationale behind this or any proposed mechanism to share this burden across the allocation. E.g., The employment land should be rationally sites and should credibly be able to support and respond to market needs.</p>
<p><b>Main issue(s) raised:</b></p> <ul style="list-style-type: none"> <li>• Requests were made that the Concept Plans incorporate and address another sports centre, improved cycle routes into and around the town, play areas, youth facilities, shops, doctor's surgery, leisure facilities e.g. cinema; theatre, trees and wildflowers, local centres which include serviced office and home-working hubs.</li> </ul>
<p><b>Consultation question CP7:</b> Do you agree with the location of the proposed uses? What should be located where and why?</p>
<p><b>Principal line(s) of argument:</b></p> <p>There were significant objections to the sites identified, many saying the sites should be retained as green fields. Some raised that detail of sites should be left to the neighbourhood plan; albeit broad support for land uses. A petition was received seeking some fields in Site 1 to be designated as local greenspace.</p> <p>Developers promoting land within Sites 1 and 2 suggested that in Site 1 the local centre be repositioned centrally in order to reduce maximum walking distances and ensure that it develops as a focus of the new community and that it be co-located with the school to help create a focus of distinct character, promote the flexible use of space and resources, provide a node of community intensity in a neighbourhood of medium density housing and to help underpin the viability of local retail and service uses. A bus stop should be located in the vicinity of the Local Centre. For Site 2, Other uses should also be considered e.g. Neighbourhood Centre; Country Park extension and additional locations for employment land.</p>
<p><b>Main issue(s) raised:</b></p> <ul style="list-style-type: none"> <li>• Widespread objection to the development of sites.</li> <li>• Requests for more employment and less housing.</li> <li>• Both Primary schools appear to be at one end of the development and far from the eastern side.</li> <li>• Housing to the east is far too close to Pewsham and the bottom of Derry Hill, cutting off the necessary health properties of natural green space.</li> </ul>
<p><b>Consultation question CP8:</b> Do you agree with the location and amount of employment provided on sites 1 and 2?</p>
<p><b>Principal line(s) of argument:</b></p>

There was some support for additional employment land, but many comments were objecting to the principle of development and felt the sites should remain as green fields. Also, some comments referred to Chippenham currently having many empty properties and plots available, in part due to the COVID pandemic and consequently, no further employment land is required. Some objections suggested the small amount of employment land doesn't justify the high level of housing proposed. Other comments suggested that employment land should be identified and developed first and be available to provide jobs for new residents. Chippenham Town Council commented that more employment land should be provided to reduce car use.

Some developer's promoting land within the sites did not agree with the location of employment land and suggested the employment land be located adjoining the A350 either south west of Chippenham near to Showell Farm or the north of Chippenham. Developers promoting Forest Farm in Site 2 didn't support the inclusion of employment land within their site. They consider the new southern distributor road will be a relatively slow road passing through new residential areas and inappropriate for large scale commercial vehicles and transport.

Future Chippenham commented that the scale and nature of employment uses in relation to the residential areas should be re-considered. The distribution of employment uses would benefit from maximising co-location in areas with the least environmental and landscape impacts. Such uses should be located where they would best benefit from good, appropriate levels of accessibility from within and beyond.

**Main issue(s) raised:**

- There is no detail about the type of employment opportunities to be provided.
- Employment should not be located immediately adjacent to the cycle path in Site 1.
- A review of future employment needs is required in response to the COVID-19 pandemic and its impact on the future shape of employment.
- There should be more employment and less housing as Chippenham is currently a commuter town for Swindon, Bath and Bristol. Provide local employment opportunities for existing and future residents to decrease the use of motorised transport and commuting.
- Chippenham Neighbourhood Plan steering group found that the third most important thing that the local community wanted to see was that the town was 'attractive to business and employment'. 8ha of employment land does not appear sufficient to support the new sustainable communities being proposed, when compared to the 26.5ha of employment land required under the current Core Strategy and where fewer houses were being proposed.
- Employment sites should be required to accommodate a range of unit sizes/types, including incubator units. Existing employment sites do not have additional space or capacity for incubator units, despite there being demand for smaller units of less than 5000 sq. ft. in the local area. Future allocated employment land is either not being built out, or if it is being built out is being developed for large distribution/warehouse units, which are less beneficial for the local economy and job market.

<p><b>Consultation question CP9:</b> Do you agree with the proposed locations for self-build and custom build housing? Would you prefer alternative locations?</p>
<p><b>Principal line(s) of argument:</b></p> <p>A substantial number of objections were objecting to the principle of having any housing development including self-build and custom build in these areas. Some commented that development should be taking place on brownfield or infill sites instead. Some comments were in favour of self-build and custom build and made suggestions as to how self-build and custom build plots could be incorporated into a site.</p> <p>Some developers objected to the inclusion of self-build and custom build housing and said the council should not seek to place the burden for delivery of self &amp; custom build plots on to developers of strategic sites contrary to national guidance and the provision of self-build and custom build plots should not be at the expense of affordable housing.</p>
<p><b>Main issue(s) raised:</b></p> <ul style="list-style-type: none"> <li>• Why are fewer than 2% of the new houses to be self-build or custom-built?</li> <li>• The more important point with self-build is the affordability of the site for the individual builders. Plot values should be affordable, and the right people should have the opportunity to self-build.</li> <li>• Self-build and custom build housing could be planned on the basis that it is designed in line with proposed density and character of its immediate context and that it is delivered within the same development phase as adjoining properties so that it is fully integrated into the new community and also leaves no gaps in the development</li> </ul>
<p><b>Consultation question CP10:</b> Do you agree with the proposed sites for renewable energy? Is there a particular type of renewable energy that should be provided?</p>
<p><b>Principal line(s) of argument:</b></p> <p>There were significant objections to this proposal. Whilst some comments supported the principle of having sites for renewable energy, many commented that the sites identified were too small, wouldn't generate a lot of power, wouldn't offset the amount of carbon produced as a result of development and considered them to be a token gesture in tackling climate change. Chippenham Town Council commented that more land should be set aside for renewable energy. Others would prefer Passivhaus design to be used and solar panels and heat pumps to be incorporated rather than having separate sites for renewable energy. Some comments suggested harnessing the power of the River Avon at the town centre weir to generate hydroelectric power.</p> <p>Future Chippenham supported the provision of renewable areas, subject to detailed masterplanning.</p>

**Main issue(s) raised:**

- What Is the basis for choosing these areas? Is there a study identifying potential?
- Any renewable energy proposals need to be appropriate and offer genuine benefit to the fight against climate change and not just be a token element. Any proposals need to be thoroughly analysed to demonstrate their contribution to tackling the climate crisis and the local need.
- The proposals would have a severe adverse impact on the town and cause unacceptable damage to the local environment through the destruction of high-quality farmland and wildlife habitat in the Avon and Marden Valley.
- Solar thermal and solar electric should firstly be fitted to all rooftops before considering using up valuable farmland for this purpose.
- None of the current new build sites at Birds Marsh, Patterdown, Bluebells and Hunters Moon include solar panels on the roofs. There is no provision for ground source heat pumps - all these houses are fitted with gas boilers, which will be obsolete in ten years.
- The sites seem limited in size and scale when compared to the proposal currently being suggested for Forest Gate at Pewsham. The proposed sites would not appear to be commercially viable.

**Consultation question CP11:** Site 1 - Do you agree with the proposal for some housing to be located north of the North Rivers cycle path?

**Principal line(s) of argument:**

There were significant objections to this proposal. Many comments including from Parish Councils feel that the proposal conflicts with the landscape policy for the area in the made Bremhill Neighbourhood Plan and that any housing would destroy the wildlife and green corridor through which the cycle path travels. Chippenham Town Council objected to built-up areas either side of cycle route, noting that there should be a green corridor as in the emerging neighbourhood plan. A small number of people did agree with the proposal, subject to it only being a small amount of housing and being integrated with other areas through walking and cycling means.

The developer promoting the land to the north of the North Rivers Cycle path has suggested that more housing could be included in this area and provided landscape evidence to support their view. Other developers do not agree with the proposal. They consider the area is less appropriate for housing and have commissioned landscape evidence to understand the constraints associated with limiting residential development to the north of the North Rivers cycle path.

**Main issue(s) raised:**

- One of the amenity losses will be the views from the cycle route.
- The area is prone to flooding

**Consultation question CP12:** Site 1 - Are there any uses that would be most suitable for Hardens Farm and New Leazes Farm?

**Principal line(s) of argument:**

A significant number of responses suggested retaining the buildings as farms. Chippenham Town Council commented that uses for Hardens and New Leaze Farms should be agricultural. Other suggested various other uses.

**Main issue(s) raised:**

Other uses suggested including:

- Pubs
- Leisure uses
- Community farms
- Youth facilities
- Outdoor education centre.

**Consultation question CP13:** Is there anything we have missed that needs to be considered in planning for Chippenham?

**Principal line(s) of argument:**

The comments raised a range of issues, some of which were objecting to the scale of development and proposed sites. Other comments covered a range of issues e.g. the consultation arrangements, how it was rushed and left questions unanswered; it would have been helpful if the proposed road and details were part of the consultation;

Chippenham Town Council suggested that the Settlement Profile infrastructure requirements are restructured to identify what is strategic and local. All the local requirements should then be moved into the Neighbourhood Plan; and commented that Wiltshire Council's view that Chippenham is attractive to employment is optimistic.

Some developers provided details of sites they are promoting.

**Main issue(s) raised:**

- Retain County Farms
- The impact of the COVID pandemic means many of the assumptions made are incorrect

- The type and range of housing provided is important – e.g. houses for single people of all ages; bungalows

**Planning for Corsham**

6.20. A summary of comments from specific consultation bodies can be found within Table 19.

*Table 19: Provides a summary of comments from specific consultation bodies on the planning for Corsham paper.*

<b>Comments from specific consultation bodies</b>
<p><b>Natural England</b></p> <ul style="list-style-type: none"> <li>• All sites at Corsham have the potential to impact the Bath and Bradford on Avon Bat Special Area of Conservation.</li> <li>• Sites 5 and 6 are in close proximity to Box Mine Site of Special Scientific Interest, which is a component of the Bat SAC. Any potential adverse impacts require further investigation.</li> <li>• Site 5 extends into a priority habitat, between Corsham Railway Cutting SSSI and Box Mine SSSI. The site encroaches on the Cotswold Area of Outstanding Natural Beauty.</li> </ul> <p><b>Wessex Water</b></p> <ul style="list-style-type: none"> <li>• Moderate Levels of development could be accommodated by the existing local network on sites 1-6. However, varying levels of more detailed investigation with regards to sewage is needed for the sites.</li> <li>• The strategic sewer replacement scheme near the railway line must be acknowledged by the emerging Local Plan.</li> </ul>

6.21. A summary of the main issues raised, against each consultation question, can be found within Table 20.

*Table 20: Provides a summary of comments, alongside main issues, on the planning for Corsham paper.*

<b>Consultation question CO1: What do you think to the scale of growth? Should there be a brownfield target?</b>
<p><b>Principal line(s) of argument:</b></p> <p>The proposed scale of growth was broadly accepted by the local community, including the town council. Some arguments were made against any further housing growth, the need for new housing to be accompanied by increased health services and for additional employment land.</p>

<p>The developer community agree that Corsham should be identified as a location for additional growth, however arguments were made for the strategy to distribute higher levels of development towards market towns, such as Corsham and for an ambitious strategy to deliver a new train station.</p> <p>There was support from the local and developer community for the development of brownfield sites, although it was not considered that they should be relied upon. The justification for a brownfield target that was higher than the residual requirement was questioned.</p>
<p><b>Main issue(s) raised:</b></p> <ul style="list-style-type: none"> <li>• Additional growth was largely accepted, but the apparency of a local need or increase in the scale was questioned.</li> <li>• An increase in the scale of growth could help to deliver transport infrastructure.</li> <li>• Growth should be directed towards brownfield sites, although a brownfield target needs to be clearly evidenced.</li> </ul>
<p><b>Consultation question CO2:</b> Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?</p>
<p><b>Principal line(s) of argument:</b></p> <p>The proposed priorities are supported, but it was felt that additional priorities could be incorporated relating to public transport improvements, 'active design', the prevention of coalescence by developing toward the south of the town, improved social infrastructure and addressing climate change.</p> <p>It was stated that the priorities need updating to reflect post-COVID-19 shopping habits.</p>
<p><b>Main issue(s) raised:</b></p> <ul style="list-style-type: none"> <li>• Review of the priorities in light of changes to shopping habits is needed, including the need for an additional supermarket.</li> <li>• Potential to consider further priorities to help achieve additional local ambitions.</li> </ul>
<p><b>Consultation question CO3:</b> Is this the right pool of potential development sites?</p>
<p><b>Principal line(s) of argument:</b></p> <p>Constraints were identified across the sites, including the neighbourhood plan Green Buffer, flooding, poor accessibility, risk of coalescence and the loss of wildlife habitats.</p>

Support was expressed for further assessment of the pool of sites, particularly sites 2, 3 and 4 due to their location. Comments were received that sites excluded at Copenacre, Potley Rise, SHELAA sites 475, 2080, 3149, 1101, Land North of Bath Road and brownfield land at Rudloe should be included in the pool and considered further.

It was reported by the landowner of site 5 that it is not available for development at this time.

**Main issue(s) raised:**

- Brownfield opportunities within the town, and at surrounding villages, should be considered ahead of development within the Green Buffer, as defined by the Corsham Neighbourhood Plan.
- Potential to remove site 5, which is not available and consider omission sites.
- Potential for all sites to impact on the Bath and Bradford on Avon Bats SAC.
- Additional sites were submitted by landowners/developers.

**Consultation question CO4:** What land do you think is the most appropriate upon which to build?

**Principal line(s) of argument:**

An argument against development within the Corsham Neighbourhood Plan green buffer was a consistent theme across almost all respondents. It was felt that the potential for new housing to be located on brownfield sites, including former MOD Rudloe, should be explored.

Site specific comments:

- **Comments relating to Site 1 (Pickwick Paddock, Bath Road)** - Potential for development above the 15 dwellings identified in the site selection report. The site is not considered to be subject to any significant landscape constraints. Particularly when compared to other sites identified within the pool
- **Comments relating to Site 2 (Land South of Brook Drive)** - Was promoted along with sites 3 and 4. Development to the south of Corsham is suggested as being preferred for avoiding impacts on designated landscapes and heritage assets
- **Comments relating to Site 3 (Land east of Lypiatt Road and west of B3353)** - Was promoted along with sites 2 and 4
- **Comments relating to Site 4 (Land east of Leafield Trading Estate and west of Lypiatt Road)** - Alone, has potential for up to 140 dwellings outside of the green buffer. Benefits of establishing a clear built line are proposed. Was promoted along with sites 3 and 2

<ul style="list-style-type: none"> <li>• <b>Comments relating to Site 5 (The Circus)</b> - Stated by the landowner that this site is not available for development at this time</li> <li>• <b>Comments relating to Site 6 (Land to the North of 16 Bradford Road)</b> - proposed to be able to deliver at least 35 dwellings. Felt to be well connected and lacking any significant land-based constraints, e.g., flood risk</li> </ul>
<p><b>Main issue(s) raised:</b></p> <ul style="list-style-type: none"> <li>• The prioritisation of brownfield land assessment prior to allocating greenfield land for development.</li> <li>• Considerable weight to be given to the green buffer to ensure the long-term separation between Corsham and surrounding villages.</li> </ul>
<p><b>Consultation question CO5:</b> 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?</p>
<p><b>Principal line(s) of argument:</b></p> <p>It was suggested that detailed consideration of the economic role of MOD Corsham, Corsham Science Park and the local mining industry needed.</p> <p>The environmental role of the green buffer was raised. The development of greenfield sites is felt as leading to the destruction of the natural environment, including habitats.</p> <p>Need for affordable housing, a local community centre.</p>
<p><b>Main issue(s) raised:</b></p> <ul style="list-style-type: none"> <li>• The strategic role of the local economy and opportunities to support different industries.</li> <li>• Need to protect the natural environment, specifically local biodiversity.</li> </ul>
<p><b>Consultation question CO6:</b> Are there any issues or infrastructure requirements that should be identified?</p>
<p><b>Principal line(s) of argument:</b></p> <p>Capacity issues are apparent at Corsham and Box Surgery and the Local Plan was considered a way of overcoming this.</p> <p>Road improvements, including improved safety for pedestrians and cyclists, were cited as local transport infrastructure issues. The A4 is under pressure as a route for through traffic from the A350 to the M4.</p>

**Main issue(s) raised:**

- Cycling infrastructure needs to be improved.
- Capacity of local health services need to be increased.

**Planning for Devizes**

6.22. A summary of comments from specific consultation bodies can be found within Table 21.

*Table 21: Provides a summary of comments from specific consultation bodies on the planning for Devizes paper.*

<b>Comments from specific consultation bodies</b>
<p><b>Natural England</b></p> <ul style="list-style-type: none"> <li>Do not support sites 1 and 2 due to impact on North Wessex Downs Area of Outstanding Natural Beauty. Concerns that site 1 would lead to restriction on movement of species in Lay Wood from wider landscape to east. Consider that Site 3 needs careful consideration due to AONB setting and nearby allotments as green infrastructure asset.</li> </ul> <p><b>Historic England</b></p> <ul style="list-style-type: none"> <li>The form and character of the town, within its landscape setting, and the availability of suitable sites should inform the proposed scale of growth.</li> <li>Support prioritising all potential brownfield opportunities. A brownfield first target is encouraged but capacity must relate to the context of the site ensuring a good fit with townscape. An accurate capacity can be informed by a Conservation Area appraisal.</li> <li>Clarification is sought that proposals have considered and responded to the historic environment – the town’s history, character and landscape setting surrounding heritage assets. A need to consider whether further evidence is required to inform the promotion of suitable development sites.</li> <li>Conservation Area Appraisal, Management Plan and a Heritage Topic Paper can inform place shaping priorities.</li> </ul> <p><b>Environment Agency</b></p> <ul style="list-style-type: none"> <li>Devizes is within the Hampshire Avon catchment which is currently failing protected area and Water Framework Directive objectives because of elevated phosphorus. Increased phosphorus levels that may reach the Hampshire Avon due to 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.</li> </ul> <p><b>Wessex Water</b></p> <ul style="list-style-type: none"> <li>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.</li> </ul>

6.23. A summary of the main issues raised, against each consultation question, can be found within Table 22.

Table 22: Provides a summary of comments, alongside main issues, on the planning for Devizes paper.

<p><b>Consultation question DE1:</b> What do you think to the scale of growth? Should there be a brownfield target?</p>
<p><b>Principal line(s) of argument:</b></p> <p>The scale of growth received a mixed response. The community mostly felt the housing requirement was too high due to insufficient road infrastructure; lack of other infrastructure, such as GPs; detrimental impact on wildlife; impact on air quality; local topographical constraints; and a lack of employment to support local jobs. Some of the community felt the amount of development to be appropriate.</p> <p>Devizes Town Council and Neighbourhood Planning Group considered the level of growth proposed as leading to less self-containment and emphasised constraints around transport, access to education, employment opportunities, as well as the impact of growth on the town’s environment, landscape setting and sense of place. It was suggested that a more affordable mix of housing should be prioritised.</p> <p>The developer community considered the scale of growth to be appropriate or too low. It was considered that the deliverability of sites ‘in the pipeline’, especially those allocated in the Devizes Neighbourhood Plan that have not come forward, should be assessed.</p> <p>Development on brownfield land first was generally supported. It was considered that brownfield land should be better defined and specific sites should be considered, and noted that the deliverability of some brownfield sites is more certain and should be included in the pool of sites, or counted in the balance.</p>
<p><b>Main issue(s) raised:</b></p> <ul style="list-style-type: none"> <li>• Growth believed to be too high or about right given the constraints in Devizes.</li> <li>• Sites ‘in the pipeline’ should be assessed for their deliverability.</li> <li>• Brownfield land should be better defined and specific sites should be considered.</li> </ul>
<p><b>Consultation question DE2:</b> Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?</p>
<p><b>Principal line(s) of argument:</b></p>

There was general support for the place shaping priorities. It was noted by some that greater emphasis should be given to the setting of the North Wessex Downs AONB and wider landscape setting of the town. It was also commented that a priority should be added on environmental assets in the town. The Drews Pond Wood Project called for a priority highlighting the importance of the Drews Pond Nature Reserve. Requests were also made for greater recognition of the Devizes Wharf project and regeneration and the role Assize Court plays in this. It was also noted that the priorities should inform the site selection process.

Other themes that were highlighted included increasing emphasis on traffic issues and sustainable transport modes including access to a potential Lydeaway train station, air quality, climate change, heritage assets, infrastructure provision, access to green space, town centre viability and vitality following covid and types of accommodation for the town.

**Main issue(s) raised:**

- Place shaping priorities should be reconsidered to address the AONB, landscape setting and environmental assets.

**Consultation question DE3:** Is this the right pool of potential development sites?

**Principal line(s) of argument:**

Objections were raised against site 6, due the lands use as green space, the impact on the Drews Pond Nature Reserve, impact on bats and traffic problems. Concerns raised that this land is mis-classified as brownfield. Objections to other sites in the pool were to sites 5, 1 and 2. Devizes Town Council and Neighbourhood Planning Group stated that not enough consideration had been given to the Devizes Neighbourhood Plan. But outlined support for site 8 and sites 3 and 5 with reduced boundaries.

North Wessex Down AONB did not support Sites 1, 2 and 3 due to impact on landscape setting. The Canal and River Trust felt that Sites 1 and 2 should contribute to enhancements to the canal towpath.

It was commented that underused retail and commercial units should be redeveloped for housing. Empty properties should be tackled. It was also noted that Windsor Drive is an effective outer boundary to the town.

Land that could also be considered for residential development includes Horton Road Principal Employment Area, which was promoted for a mix of uses; land at Devizes School, which was promoted for up to 52 homes and/or a residential care home; and land at Hillworth Road.

**Main issue(s) raised:**

- Significant objections raised to site 6 Greenacres Nursery.
- Specific brownfield sites should be considered.

- Additional sites were submitted by landowners/developers.

**Consultation question DE4:** What land do you think is the most appropriate upon which to build?

**Principal line(s) of argument:**

Brownfield sites, including vacant shops, should be developed first. Development should be small scale. There are brownfield sites coming forward that should be considered including sites in the Devizes Wharf, the old hospital site, enabling development for the new treatment centre, Wadworth Brewery and the police headquarters.

Site specific comments:

- **Comments relating to Site 1 (Land adjoining Lay Wood):** the site was actively promoted and can deliver up to 200 homes and is not felt to be subject to any significant constraints.
- **Comments relating to Site 2 (land at Coate Bridge):** Promoted alongside SHELAA site 693b and land to the east of SHELAA site 693b as an urban extension. The site comprises 25 hectares and is well related to existing employment areas and other existing services and facilities.
- **Comments relating to Site 3 (Land east of Windsor Drive):** Promoted alongside site 4 and land east of Windsor Drive as Land East of Devizes for up to 250-300 homes. Considered that this parcel can deliver residential development on the southern part, alongside open space.
- **Comments relating to Site 4 (Broadway Farm):** Promoted alongside site 4 and land east of Windsor Drive as Land East of Devizes for up to 250-300 homes. Proposals include structural landscaping to the east and south-east and a central green link across the centre of the site.
- **Comments relating to Site 5 (Land off A342 and Sleight Road):** Part of the site to the north of the railway line was promoted for up to 180 dwellings. The site is subject to heritage constraint.
- **Comments relating to Site 8 (Land to the North East of Roundway Park):** Promoted alongside part of SHELAA site 549a and can deliver up to 235 units. Proposed as retaining/enhancing the settlement edge and as being more a more suitable location for development in landscape terms when compared to other sites.

**Main issue(s) raised:**

- Review needed of brownfield site availability and deliverability in the town.
- Consider new site evidence as above.

<p><b>Consultation question DE5:</b> 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?</p>
<p><b>Principal line(s) of argument:</b></p> <p>A range of topics were raised, including opportunities to improve Green and Blue Infrastructure provision on the Kennet and Avon canal; impact on bats to the west and south of Devizes; impact on high quality agricultural land; the importance of heritage in Devizes; the importance of Greenacres Nursery and green space in general for wellbeing; accommodation for an aging population; and type of accommodation provided in Devizes.</p>
<p><b>Main issue(s) raised:</b></p> <ul style="list-style-type: none"> <li>• The role of green space and Green Infrastructure in town.</li> <li>• Accommodation type in the town.</li> </ul>
<p><b>Consultation question DE6:</b> Are there any issues or infrastructure requirements that should be identified?</p>
<p><b>Principal line(s) of argument:</b></p> <p>The following infrastructure issues were raised: lack of appropriate social infrastructure for further development; traffic congestion; incorporating cycleways to Lydeaway train station should it occur; need for improved Green and Blue Infrastructure resource.</p>
<p><b>Main issue(s) raised:</b></p> <ul style="list-style-type: none"> <li>• Consideration of Green and Blue Infrastructure in the town and the role of the Kennet and Avon canal.</li> <li>• Consideration of more sustainable modes of transport.</li> </ul>

**Planning for Malmesbury**

6.24. A summary of comments from specific consultation bodies can be found within Table 23.

*Table 23: Provides a summary of comments from specific consultation bodies on the planning for Malmesbury paper.*

<b>Comments from specific consultation bodies</b>
<p><b>Natural England</b></p> <ul style="list-style-type: none"> <li>Concerned by Sites 4 and 5. Both of these sites are in the setting of the Cotswolds AONB. In the absence of a Landscape and Visual Impact Assessment Natural England does not concur with the assessment for landscape.</li> </ul> <p><b>Historic England</b></p> <ul style="list-style-type: none"> <li>It will be necessary to demonstrate how the scale of growth and proposals for development 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.</li> </ul> <p><b>Sport England</b></p> <ul style="list-style-type: none"> <li>A strong objection to potential redevelopment of the cricket ground unless the cricket is replaced prior to the redevelopment.</li> </ul>

6.25. A summary of the main issues raised, against each consultation question, can be found within Table 24.

*Table 24: Provides a summary of comments, alongside main issues, on the planning for Malmesbury paper.*

<b>Consultation question MM1:</b> What do you think to the scale of growth? Should there be a brownfield target?
<p><b>Principal line(s) of argument:</b></p> <p>There were contrasting views on the scale of growth. Those believing the scale of growth to be too high raised concerns around the impacts upon the environment and the inability of local infrastructure to support growth. Others pointed to the role the town played and its potential for economic growth. Some considered that growth was being curtailed. Others considered the Neighbourhood Plan set out the appropriate way forward and additional growth was inappropriate.</p>

Whilst the brownfield target received comments noting the need to prioritise this land over greenfield sites, there were concerns as to the effects that this form of development could have by removing existing uses, such as local green space and commercial uses.

**Main issue(s) raised:**

- Potential for growth to promote the role of the town conflicts with the landscape, heritage and other constraints inhibiting the scope for development.
- The capacity of local infrastructure is an issue to examine alongside how to ensure the types of new homes built will meet local needs, such as affordable homes.

**Consultation question MM2:** Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?

**Principal line(s) of argument:**

There were no strong objections to the priorities. Recognition of the special characteristics of the town, including landscape, heritage was supported. It was requested that the priorities be extended to address climate change, and encompass support for the role of the town centre and recognise the needs of the young. Priorities could also be reflect the needs of local sports and leisure provision.

Comments were received that priorities to meet a range of housing needs and support economic growth might be achieved by a higher scale of growth, and support for the role of the town centre could be taken forward by a town centre strategy.

**Main issue(s) raised:**

- Priorities should match the scope raised by responses, synergising with the work on the review of the neighbourhood plan.
- Priorities should be developed, looking at the evidence to help achieve the outcomes sought such as for young people, affordable homes and the future for the town centre.

**Consultation question MM3:** Is this the right pool of potential development sites?

**Principal line(s) of argument:**

Not all the sites suggested in the pool of sites were actively promoted for development through the consultation. Many questioned the need for a pool of greenfield sites when the suggested scale of growth indicated little or no need to allocate additional land for development. Some new sites were proposed, and others disagreed with sites that were rejected.

<p>Comments focussed on constraints impacting upon sites, namely landscape, heritage ecology and flood risk. This fell alongside a range of other site-specific comments noting a series of reasons for and against development.</p> <p>Natural England objected to Sites 4 and 5 as sites for development concerned by the potential for impacts upon the qualities of the nearby Area of Outstanding Natural Beauty.</p>
<p><b>Main issue(s) raised:</b></p> <ul style="list-style-type: none"> <li>• Impact of developing greenfield land upon environmental constraints, whether these have been overstated or accurately reflected in the scale of growth.</li> <li>• Additional sites were submitted by landowners/developers.</li> </ul>
<p><b>Consultation question MM4:</b> What land do you think is the most appropriate upon which to build?</p>
<p><b>Principal line(s) of argument:</b></p> <p>The theme of prioritising the development of brownfield land as most appropriate continued alongside allowing the Malmesbury Neighbourhood Plan to lead on deciding the most appropriate land upon which to build.</p> <p>Site specific comments:</p> <ul style="list-style-type: none"> <li>• <b>Comments relating to Site 1 (Whychurch Farm and Inglenook, Crudwell Road):</b> received the most comments with the most objections. These included an objection to any development that results in the loss of the cricket pitch.</li> <li>• <b>Comments relating to Site 5 (Land West of Malmesbury and Land at Park Road):</b> had the most support as land for potential development, although often expressed in terms as a last resort or heavily caveated in other ways.</li> </ul>
<p><b>Main issue(s) raised:</b></p> <ul style="list-style-type: none"> <li>• The prioritisation of brownfield land assessment prior to allocating greenfield land for development</li> <li>• The suitability of Sites 1, 4 and 5, alongside the availability of site 2. Linked to consideration of the scale of growth additional or substitute sites need to be reviewed.</li> </ul>
<p><b>Consultation question MM5:</b> 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?</p>
<p><b>Principal line(s) of argument:</b></p>

A range of topics were raised. Meeting the needs of the young was highlighted as a particular aspect that had not been addressed, alongside better sports and leisure provision and preserving access to local green spaces.

**Main issue(s) raised:**

- The importance of meeting needs of the younger Malmesbury population

**Consultation question MM6:** Are there any issues or infrastructure requirements that should be identified?

**Principal line(s) of argument:**

While comments raised several infrastructure concerns, many focussed upon the impact of growth upon educational capacity and healthcare facilities. Others pointed to the inability of historic streets to accommodate modern traffic.

**Main issue(s) raised:**

- The ability of Malmesbury's educational and healthcare infrastructure to accommodate further residential development.

**Planning for Marlborough**

6.26. A summary of comments from specific consultation bodies can be found within Table 25.

*Table 25: Provides a summary of comments from specific consultation bodies on the planning for Marlborough paper.*

<b>Comments from specific consultation bodies</b>
<p><b>Natural England</b></p> <ul style="list-style-type: none"> <li>• Concerned by Site 1’s proximity to River Kennet SSSI and does not support Site 2 due to proximity of priority habitat. They raise the importance of Savernake Forest SSSI and disused railway tunnel for species (bats).</li> <li>• Raise doubt over the impact of development on water abstraction in the Kennet and Lambourne catchment and water quality.</li> </ul> <p><b>Environment Agency</b></p> <ul style="list-style-type: none"> <li>• Commented that the effect of climate change on the fluvial flood levels from the river may affect lower areas on Site 1; and as Site 2 lies almost entirely within Source a Protection Zone for Marlborough public water supply borehole it is not taken forward.</li> </ul> <p><b>Sport England</b></p> <ul style="list-style-type: none"> <li>• Raised concern over Site 3 due to its proximity to playing fields, outlining no land should be developed on or impacting sports facilities.</li> </ul> <p><b>Historic England</b></p> <ul style="list-style-type: none"> <li>• Noted that 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.</li> <li>• Believe heritage considerations should inform priorities, ensuring a positive strategy for the conservation and enjoyment of the historic environment is achieved. 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.</li> </ul> <p><b>Wessex Water</b></p> <ul style="list-style-type: none"> <li>• Concerns were raised regarding the wastewater network capacity in this area may being able to support the demand anticipated from development. Local upgrades to the existing drainage infrastructure may be required to ensure sufficient capacity is brought forward ahead of the development.</li> <li>• The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure.</li> </ul>

6.27. A summary of the main issues raised, against each consultation question, can be found within Table 26.

Table 26: Provides a summary of comments, alongside main issues, on the planning for Marlborough paper.

<p><b>Consultation question MB1:</b> What do you think to the scale of growth? Should there be a brownfield target?</p>
<p><b>Principal line(s) of argument:</b></p> <p>The scale of growth received a mixed response, some noting it broadly appropriate citing the need for affordable homes. Those believing the scale of growth to be too high noted concerns around a lack of accompanying employment land, impacts upon existing infrastructure, negative impacts upon the environment and the need for affordable homes not being justified by adequate evidence.</p> <p>The brownfield target generally received comments noting the need to prioritise the land for development in preference to greenfield sites. Other comments cited the need for more detailed assessment on the capacity, deliverability and viability of development on the brownfield sites identified.</p>
<p><b>Main issue(s) raised:</b></p> <ul style="list-style-type: none"> <li>• Growth believed to be too high given Marlborough’s constraints; this growth being justified by inadequate evidence of affordable housing need.</li> <li>• Brownfield land needs to be assessed to understand it’s capacity, deliverability, and viability.</li> </ul>
<p><b>Consultation question MB2:</b> Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?</p>
<p><b>Principal line(s) of argument:</b></p> <p>A number of comments noted topics or factors that people wish to see reflected in the priorities, namely: consideration given to the findings of the Marlborough Area Neighbourhood Plan, protecting the character of the town (particularly landscape and biodiversity), prioritising town centre enhancement, delivering truly affordable housing alongside recognition to the importance of tackling climate change.</p> <p>Other topics noted for consideration included: Creating a healthy town, the prioritisation of addressing a range of transport related issues, improving air quality, expanding medical and educational facilities, placing environmental considerations at the heart of development, enhancing design quality, protecting Marlborough’s heritage assets, and ensuring rural connectivity is enhanced.</p>
<p><b>Main issue(s) raised:</b></p>

- Priorities should be re-evaluated taking into consideration the value of Marlborough’s landscape character, synergising with the work on the Marlborough Area Neighbourhood Plan.

**Consultation question MB3:** Is this the right pool of potential development sites?

**Principal line(s) of argument:**

Concerns were raised regarding the perceived arbitrary exclusion of sites falling within the Preshute parish area by the Marlborough Area Neighbourhood Plan due to the plans restricted geography. Some comments noted that these sites should not be excluded from consideration within the Local Plan. Conversely, some noted the need to facilitate the ability for the Marlborough Area Neighbourhood Plan to take the lead on site selection.

Some lines of argument noted the incorrect exclusion of omission sites from earlier stages of site selection (e.g. MA2).

Other comments focussed on constraints impacting upon sites, namely landscape, ecology, SSSI and, water and flood risk.

**Main issue(s) raised:**

- Impact of developing greenfield land upon the landscape character, ecology and environmental constraints of the designated landscape Marlborough sits within.
- Achieving synergy with the Marlborough Area Neighbourhood Plan’s aspiration to allocate sites, acknowledging opposition to the arbitrary exclusion of sites sitting within Preshute parish area.
- Additional sites were submitted by landowners/developers.

**Consultation question MB4:** What land do you think is the most appropriate upon which to build?

**Principal line(s) of argument:**

The theme of prioritising the development of brownfield land as most appropriate continued alongside allowing the Marlborough Area Neighbourhood Plan to lead on deciding the most appropriate land upon which to build.

Site specific comments:

- **Comments relating to Site 1 (Land at Chopping Knife Lane):** Noted the site can deliver 50 homes (SHELAA 660, as per MANP). Evidence submitted suggests constraints such as heritage concerns can be suitably mitigated.

<ul style="list-style-type: none"> <li>• <b>Comments relating to Site 2 (Land adjacent to Salisbury Road allocation):</b> Noted the site can deliver 50 homes on the western part of this site as is currently proposed in the MANP. Noted that development would be kept on the lower slopes and access would be secured via the adjoining Salisbury Road Strategic Site. Landscaping, ecological transport and flood mitigation measures were also detailed as part of the representation.</li> <li>• <b>Comments relating to Site 3 (Land at Barton Dene):</b> Noted the site can deliver 130 homes, accommodate a new medical centre, provide 40% affordable with 10% discount market rent for qualifying current and former College employees.</li> <li>• <b>Comments relating to Site 4 (Land at College Roads):</b> Noted the site can deliver 25 to 50 homes (depending on land requirements for school), land for a new 2FE primary school, compensatory public open space alongside 40% affordable housing.</li> </ul>
<p><b>Main issue(s) raised:</b></p> <ul style="list-style-type: none"> <li>• The prioritisation of brownfield land assessment prior to allocating greenfield land for development</li> <li>• The importance of infrastructure delivery on selected sites, for example the ability for sites 3 and 4 can deliver a healthcare facility and primary school land respectively.</li> </ul>
<p><b>Consultation question MB5:</b> 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?</p>
<p><b>Principal line(s) of argument:</b></p> <p>A range of topics were raised in relation to important social, economic or environmental factors, including: Flood zone mitigation incorporating the impacts of climate change, the pursuit of biodiversity net gain and landscape protection and, calls for affordable housing.</p>
<p><b>Main issue(s) raised:</b></p> <ul style="list-style-type: none"> <li>• The importance of protecting the character of the designated landscape Marlborough sits within.</li> </ul>
<p><b>Consultation question MB6:</b> Are there any issues or infrastructure requirements that should be identified?</p>
<p><b>Principal line(s) of argument:</b></p> <p>While comments raised several infrastructure concerns, many focussed upon the impact of growth upon educational capacity, the highway network and healthcare facilities. Other topics raised included the need to provide sports and leisure facilities, concerns relating to sewerage network capacity and, parking concerns.</p>

**Main issue(s) raised:**

- The ability of Marlborough's transport, educational and healthcare infrastructure to accommodate further residential development.

**Planning for Melksham**

6.28. A summary of comments from specific consultation bodies can be found within Table 27.

*Table 27: Provides a summary of comments from specific consultation bodies on the planning for Melksham paper.*

<b>Comments from specific consultation bodies</b>
<p><b>Environment Agency</b></p> <ul style="list-style-type: none"> <li>• If the local plan supports the new canal connection, and use of the River Avon in Melksham for this proposal, the need to undertake a SFRA Level 2 for this infrastructure project should be considered.</li> <li>• Melksham has the historic line of the Wilts and Berks canal running through some sites. The River and Canal Trust would need to comment on these sites.</li> </ul> <p><b>The Canal &amp; River Trust</b></p> <ul style="list-style-type: none"> <li>• At least one of the bypass options would require a new bridge over the Kennet &amp; Avon canal. If this route goes forward, early engagement should commence with the Trust regarding the location and detailed design requirements.</li> <li>• Sites 7 and 5 are near to the Kennet &amp; Avon canal. Both sites should enhance green and blue infrastructure and recreation and contribute to enhancements to the canal towpath.</li> </ul> <p><b>Natural England</b></p> <ul style="list-style-type: none"> <li>• 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. 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. All development allocations, including within settlements, should consider impacts on the landscape and scenic beauty of the protected landscape, including cumulative impacts and impacts on the settings of protected landscapes.</li> </ul> <p><b>Historic England</b></p> <ul style="list-style-type: none"> <li>• Support prioritisation of all potential brownfield opportunities including repurposing vacant sites, or underused buildings of historic interest. An ambitious brownfield first target is encouraged.</li> <li>• A strategic understanding of the history, character and landscape setting should inform the spatial distribution, capacity and specific allocations proposed.</li> <li>• Several proposed sites adjoin or effect the setting of designated heritage assets.</li> </ul> <p><b>Wessex Water</b></p> <ul style="list-style-type: none"> <li>• Development proposed at Melksham is significant and appraisal will be required to consider solutions and how best to direct investment for growth.</li> </ul> <p><b>Sport England</b></p>

- Creation of a healthy, inclusive sustainable town should be considered when designing new housing.
- Concerns regarding site 1. The site adjacent to the south is used for football. Housing could cause planning blight should the club try to develop an artificial grass pitch. Careful masterplanning will be required.

6.29. A summary of the main issues raised, against each consultation question, can be found within Table 28.

*Table 28: Provides a summary of comments, alongside main issues, on the planning for Melksham paper.*

<b>Consultation question ME1:</b> What do you think to the scale of growth? Should there be a brownfield target?
<p><b>Principal line(s) of argument:</b></p> <p>The scale of growth proposed at Melksham, which is a significant increase on the current Core Strategy housing requirement, received a mixed response. Members of the public, on the whole, felt that the requirement to be too high, that Melksham is already delivering a large number of new homes and should not need to deliver more. Developers and landowners, on the whole, felt that the level of growth is about right considering that there are relatively few environmental constraints, that Melksham is located on the A350 and has an A350 bypass planned. Some concern that it is ambitious to deliver significant growth in Melksham until the A350 bypass is built. Some comments, including the neighbourhood plan steering group) raised that additional employment land should be allocated.</p> <p>There was general support for a higher brownfield target noting the need to prioritise brownfield land for development in preference to greenfield sites. There was support for the neighbourhood plan undertaking a detailed assessment of the capacity of brownfield sites. There may be opportunities for development on key brownfield sites in the town centre. Melksham should retain its market town feel.</p>
<p><b>Main issue(s) raised:</b></p> <ul style="list-style-type: none"> <li>• Some of the view that disproportionate uplift to requirements in Chippenham HMA and Melksham specifically are proposed, and the decision not to use Government standard calculation method places significant demand on Melksham urban and rural area communities. Others state that the scale of growth is appropriate as Melksham is relatively unconstrained and can support strategic growth.</li> <li>• Concern about impacts of growth requirements on coalescence with nearby villages.</li> <li>• Additional employment land should be allocated at Melksham.</li> </ul>

<ul style="list-style-type: none"> <li>• Brownfield land should be supported, the target higher and prioritised but this should not impact on the phasing and delivery of other sites although others question whether the brownfield land sites are available and can be viably developed to meet brownfield target.</li> <li>• Strategy is too reliant on delivery of the strategic options at Chippenham and relying upon neighbourhood plans to deliver housing growth at Large Villages.</li> <li>• There is a lack of primary and secondary school places in Melksham which the scale of growth will only exacerbate.</li> </ul>
<p><b>Consultation question ME2:</b> Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?</p>
<p><b>Principal line(s) of argument:</b></p> <p>The priorities were supported generally but some questioned how they are going to be achieved when they have not been achieved in the past. There were many comments highlighting topics that need to be prioritised, including town centre regeneration, A350 bypass, increasing flood risk, a lack of GP and dental surgeries, a lack of primary and secondary school places, ensuring climate change considerations are included in growth proposals, loss of wildlife habitats and need for biodiversity enhancement, linking the Wiltshire Local Plan with the priorities in the Joint Melksham Neighbourhood Plan, and meeting a range of housing needs, particularly for older people and affordable homes.</p>
<p><b>Main issue(s) raised:</b></p> <ul style="list-style-type: none"> <li>• Fairly equal level of both objection and support for an A350 bypass.</li> <li>• Need for future growth to contribute towards town centre regeneration which many residents feel needs urgent investment.</li> <li>• Support for restoration of Wilts &amp; Berks canal between Semington and River Avon and safeguarding a route in the Local Plan.</li> <li>• Early provision of employment land needed to accompany any new housing allocations.</li> <li>• Cycling and pedestrian links should be substantially improved across the town.</li> <li>• Priorities should consider the impacts of the Covid-19 pandemic and likely increase in home working in the future.</li> <li>• Provision of primary and secondary school places and sufficient healthcare services for a town of Melksham's size.</li> <li>• The priorities ignore the negative ecological effects of expansion of Melksham into the countryside and all new development should achieve net biodiversity enhancement.</li> </ul>
<p><b>Consultation question ME3:</b> Is this the right pool of potential development sites?</p>
<p><b>Principal line(s) of argument:</b></p>

Many residents argued that no more housing sites are needed, whilst others argued that only brownfield sites should be considered, with a higher brownfield target however it was also said that given past delivery rates of new homes on brownfield land it is highly unlikely that Melksham's housing needs can be met in full using brownfield land.

Developers and landowners wrote in support of their sites, arguing that their sites are more sustainable than others. Many residents objected to potential allocations near to where they live, with some arguing that sites in other parts of the town would be preferable. There was general agreement that the pool of sites was correct as virtually all credible sites are included for further evaluation.

It was stated that the council need to demonstrate that they have considered all reasonable alternatives. Given the large amount of land that needs to be planned for at Melksham, several large sites may be required. However, it was also argued that smaller sites should also be allocated as these may be delivered quicker. It was suggested that a 500m no development zone to the north of the Kennet and Avon canal if Sites 5, 6 or 7 are allocated for development.

Some responders argued that the council's latest published SHELAA is now dated and does not take account of sites submitted in the intervening period or sites where circumstances have changed, and that the current SHELAA comprises a gap in the evidence base. It was commented that the pool of sites does not recognise the change in the range of uses and demand some employment sites have seen.

**Main issue(s) raised:**

- The neighbourhood plan steering group consider that sites 1, 9, 10, 11, 13 and 17 are most suitable for the next assessment stage. Aspiration to achieve synergy with the neighbourhood plan's aspirations.
- The council need to demonstrate that they have considered all reasonable alternatives. Given the large amount of land that needs to be planned for at Melksham, several large sites may be required.
- The route of the Wilts & Berks canal must continue to be safeguarded.
- Impacts of developing greenfield land upon landscape character, heritage, climate change mitigation/adaption, ecology and environmental constraints.
- Bowerhill considered to have taken its share of housing development and should be treated as a Large Village.

**Consultation question ME4:** What land do you think is the most appropriate upon which to build?

**Principal line(s) of argument:**

Prioritising the development of brownfield land first before greenfield and raising the brownfield target was a common theme. residents felt that no more land should be allocated for housing in Melksham as there has been a significant increase in

housebuilding and sites should instead be allocated in other towns. Landowners and developers considered that the sites they are promoting would be the most appropriate upon which to build. Some respondents felt that it should be left up to the neighbourhood plan to decide which land was most appropriate.

Brownfield land at Avonside Enterprise Park and Upside Principal Employment Area were promoted for inclusion in the pool. Details of new sites for further consideration were received for land at Verbena Court, land north and west of Manor Farm and land to the north of Bath Road.

Site specific comments:

- **Comments relating to Site 1 (Land to the east of Melksham):** Site was promoted for residential development and can deliver up to 50 dwellings. No significant constraints were identified.
- **Comments relating to Site 4 (Land to the east of Bowerhill):** Site was promoted as two parcels which can deliver up to 200 homes and older peoples housing. Commented that sites benefit from better access to services and employment, when compared to sites to the west of the town.
- **Comments relating to Site 5 (Land to the south of Bowerhill):** Site was promoted for a significant quantum of housing and associated infrastructure. Potential for employment land to the north west of the site.
- **Comments relating to Site 9 (Land south of Western Way):** Site was subject to a live planning application. Comments suggest the site is not subject to landscape or traffic constraints
- **Comments relating to Site 11 (Land to the west of Melksham):** Site was promoted for residential use. The site would be able to secure the safeguarding and support delivery of the Wilts and Berks canal.
- **Comments relating to Site 12 (Land to the west of Shurnhold):** Site was for residential development of up to 287 homes. Comments suggest the site is not subject to any significant constraints.
- **Comments relating to Site 13 (Land to the rear of Lowbourn Infants School):** A larger site was promote for residential use, incorporating land for floor mitigation, public open space and biodiversity net gain.
- **Comments relating to Site 14 (Land north of Dunch Lane):** Site was promoted for residential development of up to 170 dwellings.
- **Comments relating to Site 16 (Land off Woodrow Road):** Part of this site was promoted for residential development of up to 77 dwellings.
- **Comments relating to Site 17 (Land north of A3102):** Site was promoted as an extension to Melksham. The eastern boundary is subject to flood risks, albeit these are felt to not be a significant constraint to development of the wider site.

**Main issue(s) raised:**

- The prioritisation of brownfield land prior to allocating greenfield land for development. The Cooper Tyres site was often mentioned as a possible future development site that could help town centre regeneration.
- An understanding of the history, character, identity, appearance and landscape setting of the town should inform site suitability; and develop sites that will lead to substantial biodiversity net gain and that include significant new areas of public open space
- Sites to the west of the town should be prioritised. Access to the town centre will be closer for walking and cycling, access to the train station will be closer and the balance of the town plan will be preserved.
- Sites that aid town centre regeneration and help resolve traffic congestion on the A350
- The need to safeguard land for a future bypass and restoration of the Wilts & Berks canal was often highlighted.
- The provision of C2 development should be an important consideration in helping to meet the need for specialist care accommodation.
- In order to contribute towards sustainable development, land that is well served by existing and proposed facilities, amenities and infrastructure should be considered most appropriate to build.

**Consultation question 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 sites?

**Principal line(s) of argument:**

A range of important social, economic and environmental issues were raised in relation to the future growth of Melksham. These include: the need for affordable homes for young people and young families, traffic congestion on the A350 through the town, future provision of an A350 bypass, protecting the countryside and wildlife and areas of open space around the edge of Melksham – including planting of trees, increasing flood risk, climate change, lack of infrastructure and amenities in the town centre, lack of GP and dental surgeries in the town, need for a secondary school. Impact of COVID-19 pandemic on factors such as home working.

The potential for visitor economy should be included, particularly access to the K&A canal by safe cycle routes and use of the River Avon route to Lacock. There is a need for any new development to aid in town centre regeneration.

**Main issue(s) raised:**

- The role and function of the town centre and edges to the settlement need to be considered carefully and sensitively to protect the wider landscape setting and deliver a strong green and biodiverse edge to the built settlement.
- Infrastructure associated with tackling the climate crisis e.g. EV charging, improved active travel network, a linked sustainable transport system, minimising out-commuting

- A strategic understanding of the history, character and landscape setting should inform the spatial distribution, capacity and specific allocations proposed.
- Need for a detailed flood risk assessment for the Melksham link project that will connect with the River Avon; and potential for an integrated approach to navigation and flood risk.
- Concerns regarding rat-running traffic, heading north along Forest Lane and through Lacock village. This impacts the residents, visitors and historic environment of Lacock. Any new housing on the north or east side of Melksham would exacerbate this.
- The River Avon and canal corridors with their wildlife and green spaces should be protected.

**Consultation question ME6:** Are there any issues or infrastructure requirements that should be identified?

**Principal line(s) of argument:**

There were many comments on a range of infrastructure concerns. The main issues were: a poor town centre experience for a town of Melksham's size with a lack of facilities and amenities, poor sport and leisure facilities since the closure of Christie Miller, lack of GP surgeries, town centre traffic congestion and future A350 bypass, increasing flood risk, loss of wildlife and areas of open space that are important for resident's mental and physical wellbeing.

Sufficient modelling of the likely traffic and air quality impacts of any proposed developments. Improved town connectivity for cyclists and pedestrians.

The need to understand the long-term effects of COVID-19. Significant investment in high-speed broadband and communications to allow for increased levels of homeworking, especially in the rural areas.

**Main issue(s) raised:**

- The ability of community facilities and transport, educational and healthcare infrastructure to accommodate significant further residential development combined with the significant investment needed in town centre services and facilities.
- The Wilts/Berks Canal link should be included as a priority infrastructure objective.
- Necessary sustainable transport infrastructure and service improvements must be identified to improve the environment and facilities at Melksham station, as well as the walking routes towards the station. The TransWilts route needs more frequent train services.
- More sustainable energy options including green energy systems and much more attention to building type, insulation, heat source and electric vehicle charging points.

## Planning for Royal Wootton Bassett

6.30. A summary of comments from specific consultation bodies can be found within Table 29.

*Table 29: Provides a summary of comments from specific consultation bodies on the planning for Royal Wootton Bassett paper.*

<b>Comments from specific consultation bodies</b>
<p><b>Natural England</b></p> <ul style="list-style-type: none"> <li>Site 7 contains the Royal Wootton Bassett Mud Springs Site of Special Scientific Interest (SSSI) which is designated for its fluvial geomorphology. Further consideration/assessment on this designation is required before it can be allocated in the Local Plan.</li> </ul> <p><b>Historic England</b></p> <ul style="list-style-type: none"> <li>The Council should consider whether a setting assessment would help to inform the allocation of development sites.</li> </ul> <p><b>Sport England</b></p> <ul style="list-style-type: none"> <li>Sites 1 and 3 are adjacent to a sports site and the housing could prejudice the use of the playing fields.</li> <li>The noise generated from these uses could cause nuisance to the new homes, therefore, an acoustic survey would be required. Any mitigation for the cricket or football would have to be on the housing land and paid for and maintained by the developer.</li> </ul>

6.31. A summary of the main issues raised, against each consultation question, can be found within Table 30.

*Table 30: Provides a summary of comments, alongside main issues, on the planning for Royal Wootton Bassett paper.*

<b>Consultation question WB1: What do you think to the scale of growth? Should there be a brownfield target?</b>
<p><b>Principal line(s) of argument:</b></p> <p>The scale of growth received a mixed response, a number of responses agreeing with the scale of growth to provide a more attractive location for business. Those with concerns over the scale of growth suggested that it was either too low or too high. Those with the opinion that the scale of growth was too low expressed that the town is ideally located on the M4 and close to Swindon which provides it with great employment opportunities, which could be realised through a higher scale of growth. Those that believe that growth levels are too high expressed their concerns about stretched infrastructure in the town, stating roads, doctor's surgeries and schools as having capacity issues.</p>

The brownfield target generally received comments noting the need to prioritise the land for development in preference to greenfield sites. Other comments cited that the brownfield targets could not be relied upon to deliver housing requirements and they should complement the spatial strategy instead of being a key element of it.

**Main issue(s) raised:**

- Growth is too low and is not representative of the opportunities in Royal Wootton Bassett given it's geographical location.
- Growth is too high and will put more pressure on infrastructure, such as, roads, doctor's surgeries and schools.
- Brownfield land targets should complement the spatial strategy rather than being relied upon to deliver housing growth.
- An affordable housing needs assessment should be carried out for the plan area as well as for the main towns and wider catchment.

**Consultation question WB2:** Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?

**Principal line(s) of argument:**

There was general support for the place shaping priorities. The important priorities for the town were considered to be traffic issues in the centre, the provision in GP surgeries and school places.

A number of comments raised additional priorities for the town, including improving cycle links to Swindon, focusing on climate change and carbon-neutral homes and protecting and improving people's access to green spaces and the countryside.

A consistent line of argument was that any development should respect the hill-top setting of the town.

**Main issue(s) raised:**

- Relieving traffic in the centre, GP provision and school places are important place shaping priorities.
- Improving cycle links to Swindon, focusing on climate change and carbon-neutral homes, and protecting/improving access to green spaces and the countryside are missing priorities.

**Consultation question WB3:** Is this the right pool of potential development sites?

**Principal line(s) of argument:**

There was a general support for site 1 & 2 due to them being north of the town and having good links to Swindon and Junction 16.

Concerns were raised over access to the south of the town (sites 4,5,6 and 7) over the railway lines and Wiltshire and Berkshire Canal, which would require a number of infrastructure upgrades to gain access, and would increase traffic problems in the town.

Other comments focussed on constraints impacting upon sites, namely landscape, historic setting, traffic and flood risk.

**Main issue(s) raised:**

- Potential exacerbation of infrastructure problems within the town by developing new housing sites before infrastructure provision is increased.
- Additional sites were submitted by landowners/developers.

**Consultation question WB4:** What land do you think is the most appropriate upon which to build?

**Principal line(s) of argument:**

The overarching theme was to prioritise brownfield land over greenfield land and only use greenfield sites when it was appropriate to be able to deliver key infrastructure or service provision that the town needs.

Site specific comments:

- **Comments relating to Site 1 (Land at Marsh Farm):** This site offers good links to the town centre and will not impact on the traffic issues on and around the high street. It will also not impact on the visual setting of Royal Wootton Bassett to the south or on the open countryside and residents' access to open space.
- **Comments relating to Site 2 (Land at Midge Farm):** Like Site 1 this site also offers good links to the town centre and will not impact on the traffic issues on and around the high street. It will also not impact on the visual setting of Royal Wootton Bassett to the south or on the open countryside and residents' access to open space.
- **Comments relating to Site 3 (Land at Maple Drive):** The site will contribute to greater car usage due to its connections to the town centre and thus lead to additional pressure on the strategic road network and increases in air pollution.
- **Comments relating to Site 4 (Land at Whitehill Lane):** The site is unsuitable because it is inaccessible and would cause traffic problems due to its location next to the dangerous junction where Whitehill Lane joins the A3102. There is a lot of wildlife on the site, and it is used frequently by the local community, giving them good access to the countryside.
- **Comments relating to Site 5 (Land south of Wootton Bassett):** There are concerns that the development of site 5 will ruin the character of Royal Wootton Bassett and could open the door to development across the south of the town.
- **Comments relating to Site 7 (Land south of Wootton Bassett A and B):** The canal is already largely restored to a rural standard and with the adjacent woodland provides a barrier between most of the developable area and the railway. It would be

<p>sensible as a part of any significant development to upgrade the area for blue/green space and ensure that a high standard of cycleway and footpath connects to the east and west.</p> <ul style="list-style-type: none"> <li>• <b>Comments relating to Site 8 (Land at Woodshaw):</b> The site is supported and seen as the most appropriate site. Comments suggest that the delivery of a GP surgery and schools is a requirement as it is not located near to a school with capacity. It has good transport links to the town and therefore would not have as much of an impact on the traffic in the centre of the town.</li> </ul>
<p><b>Main issue(s) raised:</b></p> <ul style="list-style-type: none"> <li>• The prioritisation of brownfield land assessment prior to allocating greenfield land for development</li> <li>• The importance of infrastructure delivery on selected sites, for example the ability for sites 3 and 4 can deliver a healthcare facility and primary school land respectively.</li> </ul>
<p><b>Consultation question WB5:</b> 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?</p>
<p><b>Principal line(s) of argument:</b></p> <p>An array of topics were mentioned in relation to social, economic and environmental factors, a few comment themes where: the loss of the historic setting of Royal Wootton Bassett, planning for climate change in the town and ensuring there is a buffer between the town and Swindon to negate the potential for coalescence.</p>
<p><b>Main issue(s) raised:</b></p> <ul style="list-style-type: none"> <li>• The importance of protecting the historic character of Royal Wootton Bassett and the landscape it sits within;</li> <li>• The Plan covers the period when action needs to be taken to tackle climate change.</li> <li>• The access to the countryside and green space for residents.</li> </ul>
<p><b>Consultation question WB6:</b> Are there any issues or infrastructure requirements that should be identified?</p>
<p><b>Principal line(s) of argument:</b></p> <p>While comments raised several infrastructure concerns, many focussed upon the impact of growth upon educational capacity, the highway network and healthcare facilities. Other topics raised included the need to provide sports and leisure facilities.</p>
<p><b>Main issue(s) raised:</b></p>

- The ability of Royal Wootton Bassett's road network to cope with extra capacity in the centre of the town, mainly along the high street and at the junction 16 roundabout
- That the educational services in the town cannot accommodate further residential development, most of the schools in the area are at capacity and there are no secondary school places
- Doctors and dentist appointment waiting lists are up to a months wait across the town and more housing development will only make this worse unless extra capacity is provided.

**Planning for Salisbury**

6.32. A summary of comments from specific consultation bodies can be found within Table 31.

*Table 31: Provides a summary of comments from specific consultation bodies on the planning for Salisbury paper.*

<b>Comments from specific consultation bodies</b>
<p><b>Natural England</b></p> <ul style="list-style-type: none"> <li>• Natural England does not currently support preferred site North of Downton Road, due to potential impacts from recreation and air quality, which is adjacent to the East Harnham Meadows SSSI grasslands; NE believes that the SA judgment on biodiversity needs review.</li> <li>• Development of South of Downton Road site could place cumulative pressure on the East Harnham Meadows SSSI.</li> <li>• Development at South of Downton Road and / or South of Harnham could isolate local wildlife site.</li> </ul> <p><b>Environment Agency</b></p> <ul style="list-style-type: none"> <li>• Environment Agency raised concerns about preferred site at Old Sarum, which is adjacent to a Source Protection Zone (vulnerable to pollution).</li> <li>• Quidhampton Quarry, albeit not a preferred site, is on the edge of two Source Protection Zones.</li> </ul> <p><b>Historic England</b></p> <ul style="list-style-type: none"> <li>• Historic England raised concerns about how development of preferred site at Old Sarum could be accommodated in a sensitive and historic landscape setting and, for preferred sites at Downton Road, whether heritage and landscape constraints have been appropriately taken into consideration, in relation to Woodbury Scheduled Ancient Monument and heritage assets at Britford.</li> <li>• Prioritise brownfield opportunities and re-purpose buildings of historic interest.</li> <li>• Consider need for up-to-date evidence on setting of Salisbury.</li> </ul> <p><b>Highways England</b></p> <ul style="list-style-type: none"> <li>• Significant concerns have been raised by Highways England concerning access to Quidhampton Quarry, albeit this is not a preferred site.</li> <li>• Need for evidence to understand better the A36 opportunities mentioned in 'Settlement Profile' table.</li> <li>• Need for evidence to understand what happens beyond the major road network.</li> </ul>

6.33. A summary of the main issues raised, against each consultation question, can be found within Table 32.

Table 32: Provides a summary of comments, alongside main issues, on the planning for Salisbury paper.

<p><b>Consultation question SB1:</b> What do you think to the scale of growth? Should there be a brownfield target?</p>
<p><b>Principal line(s) of argument:</b></p> <p>A significant level of concern was expressed about the effects of additional growth, in terms of loss of greenfield land, lagging infrastructure delivery, impact on highways, air-quality, landscape and biodiversity. Conversely it was suggested by developer led interests that the housing number for Salisbury could be higher, given levels of property demand; as well as comments that Salisbury needs affordable housing, which can be more easily realised through greenfield development.</p> <p>It was commented that more active travel infrastructure is needed. There was general support for redevelopment of Churchfields for residential rather than retain in employment use, due to concerns about traffic (congestion, air quality) as alternative to greenfield; and requests for improvement of amenities and facilities at Old Sarum.</p> <p>Whilst considerable support was expressed for brownfield development; others highlighted that brownfield delivery was uncertain. The matter of a brownfield target was either disputed or supported, but overall was not a major issue for respondents.</p>
<p><b>Main issue(s) raised:</b></p> <ul style="list-style-type: none"> <li>• The effects of additional growth, both upon infrastructure and the Salisbury’s historic landscape setting.</li> <li>• Concerns about loss of greenfield land.</li> <li>• More active travel modes needed.</li> <li>• Considerable support was expressed for brownfield development.</li> <li>• Greenfield development less likely to realise the levels of affordable housing that Salisbury needs.</li> </ul>
<p><b>Consultation question SB2:</b> Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?</p>
<p><b>Principal line(s) of argument:</b></p> <p>From those who expressed a preference, there was general support for the place-shaping priorities. Some concerns were raised regarding the need to protect the landscape setting of city and maintain separation with outlying villages. It was also noted that the place shaping priority about the Central Area Framework and visitor economy should incorporate other sectors, while affordable</p>

housing should be prioritised including provision for key workers, young people and the elderly. It was commented that Churchfields should remain a priority site for redevelopment to address the issues of air pollution resulting from HGV movements through city centre.

**Main issue(s) raised:**

- Concerns that the place shaping priorities do not address the city's landscape setting and separation vis-à-vis outlying villages. (particularly Britford), and this is not properly reflected in the preferred sites selected.
- Priority about visitor economy should be expanded to incorporate other sectors.
- Priority on affordable housing should be extended to embrace the needs of the young, old and key workers.
- Support for avoiding the passage of heavy-goods vehicles through the city centre to Churchfields industrial estate.

**Consultation question SB3:** Do you agree these sites are the most appropriate upon which to build? If not, why not?

**Principal line(s) of argument:**

Widespread concern expressed about preferred site North of Downton Road, given its location between the city and Britford, and impacts upon ecology, flood-risk and views to Salisbury cathedral. Some requests were received for a reduced quantum to be delivered on this site. Salisbury City Council consider that a country park should be provided, while Britford Parish Council suggest that an alternative site option should be considered in combination with preferred site North of Downton Road.

Some concerns expressed about preferred sites North-East of Old Sarum and South of Downton Road. Concerns raised about the preferred site North East of Old Sarum include impacts on landscape and Monarch's Way long distance path, and lack of facilities and amenities at Old Sarum. The National Trust also raised concerns about further north-wards expansion of Salisbury and resultant adverse impacts on landscape setting of Figsbury Ring (scheduled ancient monument).

Quidhampton Parish Council raise objection to Quidhampton Quarry (although not a preferred site) becoming a housing allocation.

General preferences were raised to prioritise brownfield land ahead of greenfield.

Support from promoters of preferred sites. Promoter of preferred site South of Downton Road seeking to expand to include Britford Park and Ride. Support from promoters of alternative site (South of Harnham). Defence of some sites that were excluded at earlier stages of the site-selection process. New sites submitted for consideration, including adjacent to Beehive Park and Ride (west of Old Sarum), south-west of Salisbury, adjacent to existing allocation on Netherhampton Road.

**Main issue(s) raised:**

- In relation to land North of Downton Road concerns raised about coalescence of Salisbury with Britford, and East Harnham Meadows SSSI.
- Redevelopment of brownfield land and re-use of vacant buildings.
- Concern about further northwards expansion of Salisbury that would have adverse impacts on landscape setting of Figsbury Ring scheduled monument.
- Further sites submitted.

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

**Principal line(s) of argument:**

Concerns were expressed in general against specific sites. All sites received concerns about the effects upon Salisbury's landscape setting, impacts upon stretched infrastructure, and need to incorporate active travel modes.

In relation to the preferred site at the North-East of Old Sarum, concerns were expressed over impacts on landscape and Monarch's Way long-distance path; while the site promoter sought a higher housing number. Regarding the preferred site North of Downton Road, there were concerns about coalescence with Britford and ecology; recreation loss; effects upon local highways / Harnham Gyratory; while the site promoter sought a higher housing number. With regard to the preferred site South of Downton Road it was requested to ensure links with Salisbury District Hospital; with concerns about recreation loss; development in elevated location; effects upon local highways / Harnham Gyratory. Regarding the alternative site South of Harnham, there was limited support for development if the North of Downton Road site was not progressed; and concern were raised about views from West Wilts & Cranborne Chase AONB.

**Main issue(s) raised:**

- Concerns were expressed in general against all sites, while being promoted by developers.
- All sites received concerns about the effects upon Salisbury's landscape setting, impacts upon stretched infrastructure, and need to incorporate active travel modes.

**Consultation question SB5:** How can these concept plans be improved?

**Principal line(s) of argument:**

Promoters of preferred sites at Old Sarum and North of Downton Road presented different approaches to the concept plans.

<p>Specific points were made in relation to each of the sites. Comments relating to North-East of Old Sarum included that housing densities need to be low to accommodate within the landscape context; ensure urban-rural transition with considered design. Comments relating to North of Downton Road included that the Concept Plan is too detailed, and other comments that the view corridor to the Cathedral needs to be well-considered. Comments relating to South of Downton Road included that development would enable emergency and public transport route from Hospital.</p>
<p><b>Main issue(s) raised:</b></p> <ul style="list-style-type: none"> <li>• Detailed points of concern were raised for each of the site concept plans.</li> <li>• Promoters of preferred sites at Old Sarum and North of Downton Road presented different approaches to the concept plans.</li> </ul>
<p><b>Consultation question SB6:</b> Do you agree with the range of uses proposed? Which other uses should be considered?</p>
<p><b>Principal line(s) of argument:</b></p> <p>Specific points were made in relation to each of the sites. In relation to preferred site North-East of Old Sarum, it was commented that the housing number should be raised and the requirements for open space should be confirmed. It was commented that the scheme should incorporate pedestrian linkages and surface water drainage. In relation to the preferred site North of Downton Road it was commented that the housing number should be raised and community infrastructure requirements should be confirmed.</p>
<p><b>Main issue(s) raised:</b></p> <ul style="list-style-type: none"> <li>• Arguments advanced in the main by site promoters including that housing numbers should be raised, and details should be clarified.</li> </ul>
<p><b>Consultation question SB7:</b> Do you agree with the location of the proposed uses? What should be located where - and why?</p>
<p><b>Principal line(s) of argument:</b></p> <p>Few arguments were advanced, mainly from site promoters. Comments relating to North-East of Old Sarum included the need to ensure good-quality open space and effective drainage. Comments relating to North of Downton Road included the necessity to agree size and positioning of view corridor to Cathedral. Comments relating to North and South of Downton Road included the necessity to agree number and positioning of road accesses and importance of planning sites comprehensively and ensuring a balance of local green infrastructure.</p>
<p><b>Main issue(s) raised:</b></p>

<ul style="list-style-type: none"> <li>Comments including in relation to planning for open space, drainage, views to the Cathedra, highways and green infrastructure.</li> </ul>
<p><b>Consultation question SB8:</b> Do you agree with the proposed locations for self-build and custom-build housing? Would you prefer alternative locations?</p>
<p><b>Principal line(s) of argument:</b></p> <p>A mixture of support and concern for custom and self-build housing, concern being from development sector.</p>
<p><b>Main issue(s) raised:</b></p> <p>Preferred sites NE of Old Sarum and North of Downton Road: evidence required to support requirement for self &amp; custom-build; suggestion of greater involvement for neighbourhood plans in such provision and an alternative strategy for location of this type of housing development on smaller-scale sites OR parcel within a larger site that might be accessed independently.</p>
<p><b>Consultation question SB9:</b> Are there any other issues or infrastructure requirements that should be identified?</p>
<p><b>Principal line(s) of argument:</b></p> <p>Comments relating to additional infrastructure requirements raised were in relation to contribution to the city economy; optimising Salisbury District Hospital; identifying sites for economic growth; querying the position of Laverstock-Ford within settlement hierarchy; addressing the need for employment land at Fugglestone Red; improving amenities and facilities at Old Sarum site; increasing provision for cycling / walking; addressing city-wide shortfall in surgery space.</p>
<p><b>Main issue(s) raised:</b></p> <ul style="list-style-type: none"> <li>A range of specific issues were advanced, including city economy, settlement hierarchy and community infrastructure.</li> </ul>

**Planning for Tidworth and Ludgershall**

6.34. A summary of comments from specific consultation bodies can be found within Table 33.

*Table 33: Provides a summary of comments from specific consultation bodies on the planning for Tidworth and Ludgershall paper.*

<b>Comments from specific consultation bodies</b>
<p><b>Natural England</b></p> <ul style="list-style-type: none"> <li>• Concerns that Site 1 (SHELAA reference 3498) is within the setting of the North Wessex Downs AONB and any landscape impact needs detailed consideration.</li> <li>• Similarly, Sites 4 and 5 would result in major allocations and landscape assessments would be needed as a result.</li> <li>• Additionally, site 5 contains a significant area of deciduous woodland and any future development would need to retain this priority habitat.</li> </ul> <p><b>Environment Agency</b></p> <ul style="list-style-type: none"> <li>• Outlined that 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.</li> <li>• Sport England</li> <li>• Concern that development at sites 5 and 6 would lead to loss of playing fields.</li> </ul> <p><b>Southern Water</b></p> <ul style="list-style-type: none"> <li>• Identified site 5 as having potential impacts on the local sewer network, particularly due to proximity to Ludgershall Waste Water Works. As a result, there are odour risks which would need to be assessed and underground wastewater pipes would need to influence the layout of the site.</li> </ul> <p><b>Wessex Water</b></p> <ul style="list-style-type: none"> <li>• The need for co-operation between the three water undertakers in the Tidworth and Ludgershall area in drainage and water supply arrangements on new developments.</li> </ul>

6.35. A summary of the main issues raised, against each consultation question, can be found within Table 34.

*Table 34: Provides a summary of comments, alongside main issues, on the planning for Tidworth and Ludgershall paper.*

<b>Consultation question TL1: What do you think to the scale of growth? Should there be a brownfield target?</b>
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<p><b>Principal line(s) of argument:</b></p> <p>Comments suggest that following recent growth and in light of planned growth, the proposed housing requirement was accepted. The developer community argued that increasing the supply of new home would support self-containment and could help to meet any unmet needs of the adjoining Andover Housing Market Area.</p> <p>It was felt that priority should be given to brownfield development, although none are considered to be available at Ludgershall for housing development.</p>
<p><b>Main issue(s) raised:</b></p> <ul style="list-style-type: none"> <li>• Scale of growth proposed considered to be suitable but increasing the housing requirement could help to deliver employment and infrastructure improvements.</li> </ul>
<p><b>Consultation question TL2:</b> Do you agree that the strategy should look to allocate more employment land?</p>
<p><b>Principal line(s) of argument:</b></p> <p>The basis of the proposed additional 5 hectares of employment land was questioned, with it being clear that additional employment land should not be identified ahead of the delivery of Castledown Business Park.</p>
<p><b>Main issue(s) raised:</b></p> <ul style="list-style-type: none"> <li>• Additional employment land is not felt to be needed at this time.</li> </ul>
<p><b>Consultation question TL3:</b> How could the delivery of employment on the Castledown Business Park be facilitated?</p>
<p><b>Principal line(s) of argument:</b></p> <p>Arguments were made for allowing a wider range of uses on the site, including retail and leisure. It was also noted that an approach to upscaling housing growth could facilitate inward investment.</p> <p>It was also commented that more active marketing and incentives could support new small businesses. Other suggestions include the opening of the train line and WC financial support towards build costs.</p>
<p><b>Main issue(s) raised:</b></p>

- There is an opportunity to consider a wide range of uses on the site, which is currently restricted to employment.

**Consultation question TL4:** Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?

**Principal line(s) of argument:**

The themes of the priorities were generally supported. Additional topics were suggesting, including new recreation and leisure facilities for younger families, enhancements of bus services and safe walking routes, regeneration of central Ludgershall and street trees.

The developer community stated that infrastructure enhancements, such as a distributor road or train station, relies on the delivery of site 4.

**Main issue(s) raised:**

- Consideration needed for additional priorities, particularly for Tidworth where few are identified, as well as how these will be delivered.

**Consultation question TL5:** Is this the right pool of potential development sites?

**Principal line(s) of argument:**

There was little support for sites around Tidworth, with all sites identified as not available by the landowner. Development at Ludgershall was supported by some, and further consideration of the pool of sites was accepted. The landowner for sites 5, 6 and 7 requested that these sites were not considered further as they are not available for development.

Concerns were raised that development to the west of Ludgershall could lead to a loss of the separation between the two towns. The inclusion of larger sites was considered to be unjustified given the level of growth proposed.

Sites 1, 2, 3 and 6 were considered by some to have poor accessibility to, or to have little scope to making contribution to the public transport network. It was commented that for larger sites bus access options would need to be explored.

**Main issue(s) raised:**

- Land availability is limited, with only sites at Ludgershall being identified as available for development.

<b>Consultation question TL6:</b> What land do you think is the most appropriate upon which to build?
<p><b>Principal line(s) of argument:</b></p> <p>Land availability is largely reliant on Ministry of Defence operations and strategic development at site 4 is felt to be capable of delivering significant benefits to the local community.</p> <p>Generally, further consideration of sites 4 and 5 was supported, however arguments were made regarding the scale of these developments, particularly in light of the proposed scale of growth. Concerns were raised over the timing of infrastructure delivery, specifically Empress Way.</p> <p>Site specific comments:</p> <ul style="list-style-type: none"> <li>• <b>Comments relating to Site 1 (Land East of Crawlboys Road):</b> This site was identified as being available for development.</li> <li>• <b>Comments relating to Site 2 (Land North of A342):</b> This site was identified as being available for development.</li> <li>• <b>Comments relating to Site 3 (Land North-east of A342):</b> This site was identified as being available for development.</li> <li>• <b>Comments relating to Site 4 (Land at Empress Way):</b> The site was identified as having capacity for up to 1,500 new home and associated infrastructure, including a new local centre, land for a train station and a distributor road.</li> <li>• <b>Comments relating to Site 5 (south-west Ludgershall):</b> The site was identified by the landowner as not being available.</li> <li>• <b>Comments relating to Site 6 (Land North of Wellington Academy):</b> The site was identified as unavailable as the land is restricted to recreational use as part of the expansion of Wellington Academy.</li> <li>• <b>Comments relating to Site 7 (Land North of A3026):</b> The site was identified by the landowner as not being available.</li> <li>• <b>Comments relating to Site 8 (Land West of Pennings Road):</b> The site was identified by the landowner as not being available.</li> <li>• <b>Comments relating to Site 9 (North-west Tidworth):</b> The site was identified by the landowner as not being available.</li> <li>• <b>Comments relating to Site 10 (Land South of Bulford Road):</b> The site was identified by the landowner as not being available.</li> <li>• <b>Comments relating to Site 11 (Land South of The Mall):</b> The site was identified by the landowner as not being available.</li> </ul>
<p><b>Main issue(s) raised:</b></p> <ul style="list-style-type: none"> <li>• Land availability is limited to Ludgershall, where constraints such as the historic environment, North Wessex Downs AONB and the Test Valley Borough Council boundary are apparent.</li> </ul>

<b>Consultation question TL7:</b> 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?
<b>Principal line(s) of argument:</b>  Additional topics for consideration related to environmentally friendly design, new facilities e.g., retail to support self-containment and protection of the rural character of the area.
<b>Main issue(s) raised:</b>  <ul style="list-style-type: none"> <li>• Aims to achieve better self-containment in the context of an area with a rural character.</li> </ul>
<b>Consultation question TL8:</b> Are there any issues or infrastructure requirements that should be identified?
<b>Principal line(s) of argument:</b>  1.50. Transport infrastructure opportunities associated with the commercialisation of the railway line, a strategic cycle lane between Andover and Ludgershall and link road to take pressure off of Andover Road as a through route for commuter traffic.
<b>Main issue(s) raised:</b>  <ul style="list-style-type: none"> <li>• Traffic and congestion issues associated with the A342 (Andover Road).</li> </ul>

**Planning for Trowbridge**

6.36. A summary of comments from specific consultation bodies can be found within Table 35.

*Table 35: Provides a summary of comments from specific consultation bodies on the planning for Trowbridge paper.*

<b>Comments from specific consultation bodies</b>
<p><b>Historic England:</b></p> <ul style="list-style-type: none"> <li>• Greater clarity needed on how level of growth and proposals have considered and responded to historic environment (landscape setting and heritage assets).</li> <li>• Prioritisation of brownfield land, including underused heritage buildings, is supported but must be designed sensitively to historic environment.</li> <li>• Reappraise employment and economic growth and take realistic approach to housing numbers for a town which is swamped with commuters.</li> <li>• Priorities could reflect positive strategy for conservation and enjoyment of the historic environment.</li> <li>• Greater clarity needed on how landscape setting of town and historic environment has informed site selection in accordance with national policy.</li> </ul> <p><b>Sport England:</b></p> <ul style="list-style-type: none"> <li>• Creation of a healthy, inclusive sustainable town can be achieved through use of their ‘Active Design’ guidance.</li> </ul> <p><b>Natural England:</b></p> <ul style="list-style-type: none"> <li>• Concerns raised, as preferred sites are in a medium risk area associated with important bat populations, ecological connectivity with the Kennet and Avon Canal important. Further assessment is needed and updating of Trowbridge Bat Mitigation Strategy to consider functionality of landscape including Hilperton Gap.</li> <li>• Local Plan must also consider potential designation of Trowbridge Woods as a SSSI.</li> </ul> <p><b>Wessex Water:</b></p> <ul style="list-style-type: none"> <li>• Concerns raised about scale of development, which is significant and requires major investment in networks and treatment. Clear guidance needed as to timescales and phasing to ensure strategies and investment can be in place.</li> </ul>

6.37. A summary of the main issues raised, against each consultation question, can be found within Table 36.

*Table 36: Provides a summary of comments, alongside main issues, on the planning for Trowbridge paper.*

**Consultation question TB1:** What do you think to the scale of growth? Should there be a brownfield target?

**Principal line(s) of argument:**

The scale of growth received a mixed response, with a significant majority raising objection. Some argued that it should be lower because of concerns about the unknown long-term effects of Brexit and Covid-19, the need for town centre regeneration, a lack of infrastructure, climate change impacts and loss of greenfield land. Others argued for more development to be directed to market towns and rural areas, and for a greater emphasis on smaller sites.

There was mixed support for a brownfield target. Those who believed it should be higher also supported prioritising brownfield land, including vacant buildings in the town centre.

**Main issue(s) raised:**

- Preference raised for a lower scale of growth at Trowbridge with more growth being directed towards market towns and rural areas.
- Preferred emphasis upon smaller sites rather than a reliance on large, complex sites at principal settlements.
- Preference for prioritisation of brownfield land, including vacant buildings in the town centre.

**Consultation question TB2:** Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?

**Principal line(s) of argument:**

There was some support for the priorities, however the consensus from a considerable number of consultees was that they are not necessarily reflected in the strategy for Trowbridge. Other priorities suggested included protection of outlying village identities, addressing the causes and impacts of climate change, responding to the impacts of Covid-19 on the town centre, considering new / flexible uses for vacant buildings, and providing enhancement to services, amenities, and green infrastructure for the town.

**Main issue(s) raised:**

- While some of the priorities were considered to be correct, they were not considered to be fully reflected in the strategy for the town.
- Requests to expand the list of priorities to include, for example, protecting village identities, addressing climate change, addressing the impacts of Covid-19 and provision of enhanced services and amenities.

<b>Consultation question TB3:</b> Do you agree these sites are the most appropriate upon which to build? If not, why not?
<p><b>Principal line(s) of argument:</b></p> <p>All preferred sites received considerable objections because of, for example, traffic generation and congestion in the town and neighbouring settlements, flood risk, lack of infrastructure and loss of farmland. Some argued the location of growth to be inappropriate and that the capacity of the preferred sites exceeds local needs.</p> <p>A range of alternative sites were suggested by the local community and/ or promoted by developers, including brownfield sites such as Bowyers, East Wing, unused commercial land and premises.</p>
<p><b>Main issue(s) raised:</b></p> <ul style="list-style-type: none"> <li>• All the preferred sites likely to suffer from traffic congestion, flood risk, lack of infrastructure and loss of farmland.</li> <li>• The location of growth and capacity of sites are inappropriate and brownfield sites should be prioritised.</li> <li>• Further site options submitted.</li> </ul>
<b>Consultation question TB4:</b> What are the most important aspects to consider if these sites are going to be built on?
<p><b>Principal line(s) of argument:</b></p> <p>The following were considered to be some of the most important aspects to be considered for all sites. Traffic generation and congestion in Trowbridge, Hilperton and Staverton; impacts on the road network, including Staverton Bridge, and walking and cycling; exacerbation of flood risk; lack of infrastructure, including health care and local services; and loss of farmland.</p> <p>Other responses emphasised the need for developers and the Council to work together to overcome specific issues, such as viability and the provision of on-site open space.</p>
<p><b>Main issue(s) raised:</b></p> <ul style="list-style-type: none"> <li>• Development on these sites will need to address concerns, such as traffic congestion, flood risk, and infrastructure requirements.</li> <li>• The delivery of large, complex sites will require close cooperation between developers and the Council.</li> </ul>
<b>Consultation question TB5:</b> Considering the environmental constraints around the town, what other reasonable options should the Council consider investigating in order to address the identified forecast development needs for the place?

<p><b>Principal line(s) of argument:</b></p> <p>A range of alternative options were raised that the Council should consider investigating, including distributing housing to other towns and villages, creating a new settlement, reviewing the Green Belt, using allocated employment land for housing, prioritising brownfield development such as vacant buildings in the town centre and more emphasis upon smaller sites rather than reliance on large, complex sites.</p>
<p><b>Main issue(s) raised:</b></p> <ul style="list-style-type: none"> <li>• Consider diversifying the uses proposed, to include uses such as employment, food production, recreational and green open space and services and facilities.</li> </ul>
<p><b>Consultation question TB6:</b> Do you agree with the range of uses proposed, what other uses should be considered?</p>
<p><b>Principal line(s) of argument:</b></p> <p>A range of other uses were suggested, including employment (such as start-up units for businesses or spaces for coffee shop/ shared office space areas), agricultural land for food production, open space for recreational uses, protected green space on both sides of the canal (Site 5), convenience stores, GP/ dental surgeries, allotments, and landmark design elements, such as a native wildflower meadow.</p>
<p><b>Main issue(s) raised:</b></p> <ul style="list-style-type: none"> <li>• Consider diversifying the uses proposed, to include uses such as employment, food production, recreational and green open space and services and facilities.</li> </ul>
<p><b>Consultation question TB7:</b> Do you agree with the location of the proposed uses? What should be located where and why?</p>
<p><b>Principal line(s) of argument:</b></p> <p>Responses discussed the location of open space for recreation. For instance, they questioned the rationale for allocating open spaces on most of the sites being promoted as part of the preferred site. Far better, they argued, if there was a series of smaller open spaces located throughout the new allocations.</p>

<b>Consultation question TB7:</b> Do you agree with the location of the proposed uses? What should be located where and why?
<p><b>Principal line(s) of argument:</b></p> <p>Responses discussed the location of open space for recreation. For instance, they questioned the rationale for allocating open spaces on most of the sites being promoted as part of the preferred site. Far better, they argued, if there was a series of smaller open spaces located throughout the new allocations.</p>
<p><b>Main issue(s) raised:</b></p> <ul style="list-style-type: none"> <li>• A series of smaller open spaces dispersed throughout the preferred allocation is preferred over the inclusion of large open spaces on most of the individual sites making up the preferred allocation.</li> </ul>
<b>Consultation question TB8:</b> Do you agree with the proposed locations for self-build and custom build housing? Would you prefer alternative locations?
<p><b>Principal line(s) of argument:</b></p> <p>Responses suggested a range of alternative locations for self-build and custom-build housing, such as on brownfield sites, outside the settlement boundary, dispersed across the preferred sites or, alternatively, near water features or the edges of the preferred sites to allow for privacy and minimise disruption.</p> <p>There was also support for neighbourhood plans to have a greater role in determining the location of self-build and custom-build housing.</p>
<p><b>Main issue(s) raised:</b></p> <ul style="list-style-type: none"> <li>• A broader range of locations should be considered for self-build and custom-build housing both on- and off-site.</li> <li>• The neighbourhood plan should have more responsibility for determining the location of self-build and custom-build housing.</li> </ul>
<b>Consultation question TB9:</b> Is there a particular type of renewable energy that should be provided on site?
<p><b>Principal line(s) of argument:</b></p>

<p>Responses made a range of suggestions for the type of renewable energy that should be provided on-site, including solar panels, triple glazing, biomass boilers, wind turbines, underground heating with battery pack storage and electric car charging points for every house.</p> <p>It was also argued that new homes should be built to the highest energy standards and, where appropriate, renewable energy facilities to be mandatory for each home.</p>
<p><b>Main issue(s) raised:</b></p> <ul style="list-style-type: none"> <li>• A more comprehensive range of renewable energy types should be provided on site.</li> <li>• Every home should be built to the highest energy standards with renewable energy facilities mandatory.</li> </ul>
<p><b>Consultation question TB10:</b> Are there any other issues or infrastructure requirements that should be identified?</p>
<p><b>Principal line(s) of argument:</b></p> <p>Comments raised several infrastructure concerns, namely:</p> <ul style="list-style-type: none"> <li>• Addressing traffic impact around, as well as within, the town, especially at Staverton Bridge and through Hilperton village.</li> <li>• Rationale for a new secondary school is not adequately explained. There is concern that the scale of growth is high to justify its provision.</li> <li>• The need to safeguard green space between settlements for mental and physical well-being.</li> </ul>
<p><b>Main issue(s) raised:</b></p> <ul style="list-style-type: none"> <li>• The ability of Trowbridge's transport, education, and green infrastructure network to accommodate further residential development</li> </ul>

## Planning for Warminster

6.38. A summary of comments from specific consultation bodies can be found within Table 37.

*Table 37: Provides a summary of comments from specific consultation bodies on the planning for Warminster paper.*

<b>Comments from specific consultation bodies</b>
<p><b>Natural England</b></p> <ul style="list-style-type: none"> <li>• Concern relating to site 9, due to encroachment on the rural landscape and impact on ecological connectivity.</li> <li>• All sites fall within the zone of influence on the Salisbury Plain Special Protection Area.</li> </ul> <p><b>Highways England</b></p> <ul style="list-style-type: none"> <li>• There is a risk of noise and air quality issues arising from site 4's close proximity to the A36.</li> <li>• There are similar risks with regards to site 8.</li> <li>• Suitable buffers will be required, as well as consideration of potential drainage and landscape effects on the road.</li> <li>• The Transport Review should include an assessment of A36 at Warminster.</li> <li>• Clarification of any access arrangements is required.</li> </ul> <p><b>Environment Agency</b></p> <ul style="list-style-type: none"> <li>• Part of site 9 should be excluded from further consideration for pollution prevention reasons.</li> <li>• The risk contamination of Warminster Malting Public Water Supply boreholes is a consideration for Sites 5-8.</li> <li>• The entirety of the Warminster area is within the Hampshire Avon catchment and increased phosphorus levels arising from would need to be offset in line with EA and Natural England guidance.</li> </ul> <p><b>Sport England</b></p> <ul style="list-style-type: none"> <li>• Raised objection to any development at sites 1 and 2, due to a resulting loss of playing fields.</li> </ul>

6.39. A summary of the main issues raised, against each consultation question, can be found within Table 38.

*Table 38: Provides a summary of comments, alongside main issues, on the planning for Warminster paper.*

<b>Consultation question WA1:</b> What do you think to the scale of growth? Should there be a brownfield target?
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<p><b>Principal line(s) of argument:</b></p> <p>Some concerns relating to the permitted West Warminster Urban Extension, including that the level of growth to be delivered is above the figure stated by the allocation policy, and the reliance on its delivery to meet housing needs. In contrast there was also support for maximising the use of land on this site to deliver the residual needs.</p> <p>There was considered to be potential for a brownfield target to meet the residual figure. Some argued that a brownfield target is not required.</p> <p>The residual requirement was considered by the developer community to be too low and additional planned growth and a widened supply were seen as a way of ensuring contingency.</p> <p>The developer community felt that housing delivery through neighbourhood plans should not be relied upon.</p>
<p><b>Main issue(s) raised:</b></p> <ul style="list-style-type: none"> <li>• A constraint on growth beyond the West Warminster Urban Extension is broadly accepted, but there are opportunities to broaden planned growth to ensure contingency.</li> <li>• Additional growth should be directed towards brownfield land, including opportunity sites in the town centre. Alternatively, availability of greenfield land suggests that a brownfield target is not required.</li> </ul>
<p><b>Consultation question WA2:</b> Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?</p>
<p><b>Principal line(s) of argument:</b></p> <p>It was commented by some that more emphasis should be placed on walking and cycling. Car parking in the town centre was also identified as having a role in supporting the supermarkets and shops. It was noted that there is an opportunity for the neighbourhood plan to reappraise the town centre.</p> <p>Comments also suggested other factors for consideration, including preservation and enhancement of greenspaces, flood risk, GP surgery expansion, carbon reduction and provision of an improved integrated transport network.</p>
<p><b>Main issue(s) raised:</b></p> <ul style="list-style-type: none"> <li>• Priorities should be reconsidered in line with the broader aims of the plan and work with the any emerging neighbourhood plan to identify priorities for the town centre post COVID-19.</li> </ul>

**Consultation question WA3:** Is this the right pool of potential development sites?

**Principal line(s) of argument:**

There was general support for further consideration of the proposed pool of sites, although concerns were raised relating to the environmental impact of developing on greenfield sites outside of the settlement boundary, including urban encroachment resulting from site 9 and impacts of development at site 8 on the adjacent Norridge Woods Ancient Woodland.

Additional land at Ashley Coombe was promoted, with it being suggested that the parcel to the west of Land adjacent to Fanshaw Way was more suitable for development in the short term. Land excluded at Land North of Grovelands Way was promoted. Two developers promoted the West Warminster Urban extension as an opportunity to deliver the identified residual requirement.

Site 1 was identified by the landowner as not being available for development at this time. Questions were raised over the inclusion of land east of the Dene, as part of the site was removed from the draft Housing Wiltshire Sites Allocations Plan on the grounds of heritage impacts. It was noted that Site 5 is subject to flood constraints and is not sequentially preferable. Many of the sites were felt to be physically removed from the town.

**Main issue(s) raised:**

- Careful consideration needed of potential environmental impacts of developing greenfield sites.
- Greenfield opportunities are available, but the pool doesn't currently reflect the proposed scale of growth.
- Additional sites were submitted by landowners/developers.

**Consultation question WA4:** What land do you think is the most appropriate upon which to build?

**Principal line(s) of argument:**

Support for a continued focus on the West Warminster Urban Extension and maximising of land at the allocation. Prioritisation of brownfield sites ahead of allocating the identified sites.

Site specific comments:

- **Comments relating to Site 1 (North Warminster/Elm Hill):** Landowner stated that this site is not available for development as this time.
- **Comments relating to Site 2 (East Warminster/East of the Dene):** Land was identified as being available and further consideration is supported.

<ul style="list-style-type: none"> <li>• <b>Comments relating to Site 3 (Land adjacent to Fanshaw Way):</b> A larger parcel of land was promoted and identified as being able to provide a first phase of 60 homes and a further phase, including an odour buffer and green space.</li> <li>• <b>Comments relating to Site 4 (Warminster Common):</b> It was unclear if this site was available for development.</li> <li>• <b>Comments relating to Site 5 (Land at Church Street):</b> Was proposed as a highly accessible site with heritage and flood constraints. Potential for sympathetically designed houses and sustainable construction practices. Site would be able to deliver the residual housing need for Warminster.</li> <li>• <b>Comments relating to Site 6 (Land Adjacent 89 Bath Road):</b> site was identified as forming part of the Gypsy and Traveller supply and it was unclear if this site was available for development.</li> <li>• <b>Comments relating to Site 7 (44 and 48 Bath Road):</b> Development at this site is seen as an opportunity to introduce an attractive, landscaped boundary to the town. Identified as being well connected to the town centre.</li> <li>• <b>Comments relating to Site 8 (Land at Brick Hill):</b> Promoted as two separate parcels that can be delivered. Identified capacity of 130 and 110 dwellings, including 30% affordable tenure. The urban extension to the south of the site would increase accessibility. Potential to be well related to land identified for employment to the east and opportunities for landscape mitigation to the west.</li> <li>• <b>Comments relating to Site 9 (Land at New Farm):</b> Site proposed as a strategic opportunity, a first phase would be able to deliver up to 200 homes.</li> </ul>
<p><b>Main issue(s) raised:</b></p> <ul style="list-style-type: none"> <li>• Potential for the West Warminster Urban Extension to deliver identified housing needs.</li> <li>• The prioritisation of brownfield land assessment prior to allocating greenfield land for development.</li> <li>• Greenfield land availability is good, but further assessment of the constraints of each of these is needed.</li> </ul>
<p><b>Consultation question WA5:</b> 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?</p>
<p><b>Principal line(s) of argument:</b></p> <p>The environment, specifically green infrastructure, was highly valued. As was the local historic environment.</p>
<p><b>Main issue(s) raised:</b></p> <ul style="list-style-type: none"> <li>• Future development needs to minimise the loss of green space and avoid impacts of heritage assets.</li> </ul>
<p><b>Consultation question WA6:</b> Are there any issues or infrastructure requirements that should be identified?</p>

<b>Principal line(s) of argument:</b>
Comments largely relate to transport and the need for an integrated network/enhanced walking and cycling routes.
<b>Main issue(s) raised:</b>
<ul style="list-style-type: none"><li>• Transport, specifically sustainable transport, improvements should accompany the growth strategy.</li></ul>

**Planning for Westbury**

6.40. A summary of comments from specific consultation bodies can be found within Table 39.

*Table 39: Provides a summary of comments from specific consultation bodies on the planning for Westbury paper.*

<b>Comments from specific consultation bodies</b>
<p><b>Wessex Water</b></p> <ul style="list-style-type: none"> <li>• For brownfield sites, redirect surface water from foul water network and limit surface water flows using SuDS</li> <li>• Significant improvements likely to generate works close to the railway line require substantial planning and lead-in times</li> <li>• Site 6 and 7 are within drinking water source zone of Wellhead Springs. Objection raised to development that risks drinking water quality.</li> </ul> <p><b>Historic England</b></p> <ul style="list-style-type: none"> <li>• Support brownfield development provided development is informed by the context of the historic environment.</li> <li>• Suggest Heritage Topic Paper to inform place-shaping priorities and show a positive approach to the historic environment.</li> <li>• Several sites affect setting of designated heritage assets and will require a heritage assessment.</li> </ul> <p><b>Natural England</b></p> <ul style="list-style-type: none"> <li>• Concern that Site 6 is likely to be at least as damaging to the landscape as the rejected eastern bypass for Westbury.</li> <li>• Proposals at site 10 need to demonstrate no net detriment to the existing GI network and Public Rights of Way.</li> </ul> <p><b>Sport England</b></p> <ul style="list-style-type: none"> <li>• Raised concern over Site 11, an existing playing field, which should not be developed for housing unless surplus to requirements or similar alternative provision is provided elsewhere.</li> </ul>

6.41. A summary of the main issues raised, against each consultation question, can be found within Table 40.

*Table 40: Provides a summary of comments, alongside main issues, on the planning for Westbury paper.*

<p><b>Consultation question WE1:</b> What do you think to the scale of growth? Should there be a brownfield target? Should it be higher or lower?</p>
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<p><b>Principal line(s) of argument:</b></p> <p>The scale of growth received a mixed response. Some argued that growth would need to address A350 congestion and air quality management; sustainable transport and linkages; town centre recovery and regeneration; and affordable housing delivery. Those arguing for higher levels consider Westbury as the least constrained settlement in the Trowbridge Housing Market Area.</p> <p>General support for a brownfield target, with the neighbourhood plan viewed as having a key role to play. Some argued for a high brownfield target and less, if any, greenfield development.</p>
<p><b>Main issue(s) raised:</b></p> <ul style="list-style-type: none"> <li>• The same scale of growth, or higher, is desirable provided it comes with the necessary infrastructure and addresses the existing lack of infrastructure to support historically high levels of growth in the town.</li> <li>• A brownfield target should be met largely through the neighbourhood plan.</li> </ul>
<p><b>Consultation question WE2:</b> Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?</p>
<p><b>Principal line(s) of argument:</b></p> <p>The place-shaping priorities of infrastructure delivery, sustainable transport links, protection of employment areas and provision of open space received support. It was raised that the protection of heritage assets and landscape setting, improving the range of services and facilities, in conjunction with the neighbourhood plan, should also be priorities.</p> <p>To address traffic congestion and air pollution, there was strong support for an A350 bypass and a bridge over the railway from Mane Way / Oldfield Road. It was noted that a good first step would be a comprehensive transport strategy for Westbury to explore these options and identify strategic and site-specific measures.</p>
<p><b>Main issue(s) raised:</b></p> <ul style="list-style-type: none"> <li>• Exploration needed into transport issues to address key place-shaping priorities of infrastructure delivery and improving air quality.</li> <li>• Priorities should be expanded to encompass protection of the historic environment and landscape setting, as well as improving town centre services and facilities.</li> </ul>
<p><b>Consultation question WE3:</b> Is this the right pool of potential development sites?</p>

<p><b>Principal line(s) of argument:</b></p> <p>Concerns were raised about the difference between the pool of sites, and the sites assessed as potentially suitable for development through the AECOM study commissioned by the town council. While most sites received a mixed response, there were general objections to Site 6 and 7 on landscape grounds and Site 11, which is an existing playing field. Site 10 received the most positive responses.</p> <p>There was some concern about the availability of some sites. Several new sites were submitted, including brownfield sites.</p> <p>Calls for five sites that have been rejected should be reinstated. New sites were promoted: southwest of Petticoat Lane, Dilton Marsh; at the former Westbury Cement Works; and Tifford Farm, Westbury.</p>
<p><b>Main issue(s) raised:</b></p> <ul style="list-style-type: none"> <li>• There is the potential to re-evaluate the pool of sites to ensure consistency with the preparation of the Westbury neighbourhood plan.</li> <li>• Need to consider brownfield opportunities.</li> <li>• Additional sites were submitted by landowners/developers.</li> </ul>
<p><b>Consultation question WE4:</b> 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><b>Principal line(s) of argument:</b></p> <p>The theme of prioritising the development of brownfield land as most appropriate continued alongside enabling the Westbury Neighbourhood Plan to lead on determining the most appropriate land upon which to build.</p> <p>While there was support for the protection of employment land, particularly at the West Wilts Trading Estate, there was some argument for a more flexible approach to allow for a greater diversity of uses, for example at the former Westbury Ironworks and the Hawke Ridge Strategic Employment Allocation.</p> <p>Site Specific comments</p> <ul style="list-style-type: none"> <li>• <b>Comments relating to Site 1 (Land north of Shallow Waggon Lane):</b> Site was promoted. Noted that the site can deliver up to 80 homes. Evidence submitted suggests constraints such as landscape concerns can be suitably mitigated.</li> </ul>

<ul style="list-style-type: none"> <li>• <b>Comments related to Site 2 (Land south-east of the West Wilts Trading Estate, land at Glenmore Farm and land off Storridge Road):</b> Site was promoted. Noted that the sites can deliver up to 200 and 145 homes. Evidence submitted suggests that the sites can be delivered in the next 1-5 years.</li> <li>• <b>Comments related to Site 3 (Land at Slag Lane):</b> Promoted. Noted that the site can deliver 150 homes. Evidence submitted suggests constraints such as flooding concerns can be suitably mitigated.</li> <li>• <b>Comments related to Site 7 (Land south of Sandhole Lane, adjoining Old Dilton Road and Turnpike Field):</b> Was promoted. Noted that the site can deliver 67 homes. Evidence in the form of an outline planning application submitted in December 2020 suggests that the site can be delivered in the next 1-5 years.</li> <li>• <b>Comments related to Site 10 (Land to the west of Mane Way):</b> Was promoted. Noted that the site can deliver 300 homes. Evidence submitted suggests constraints such as flooding, and heritage concerns can be suitably mitigated.</li> </ul>
<p><b>Main issue(s) raised:</b></p> <ul style="list-style-type: none"> <li>• Prioritise brownfield development opportunities in conjunction with the Westbury Neighbourhood Plan.</li> <li>• Protect employment land in general but be open to a more flexible approach if the circumstances are right.</li> </ul>
<p><b>Consultation question WE5:</b> 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?</p>
<p><b>Principal line(s) of argument:</b></p> <p>A range of topics were raised including better housing design, lower density, carbon neutrality and more open space. Attention was drawn to the most recent Housing Needs Assessment commissioned by Westbury Town Council that highlighted a need for affordable housing more than the total housing need for Westbury.</p> <p>Some highlighted the transport impact of growth at Westbury (past and present) on the surrounding settlements.</p>
<p><b>Main issue(s) raised:</b></p> <ul style="list-style-type: none"> <li>• Providing better quality housing and meeting the affordable housing need in Westbury.</li> <li>• The need to consider the impact of growth at Westbury on rural roads.</li> </ul>
<p><b>Consultation question WE6:</b> Are there any issues or infrastructure requirements that should be identified?</p>
<p><b>Principal line(s) of argument:</b></p>

Comments raised several infrastructure concerns, namely:

- Transport improvements, specifically the need for an A350 bypass and a bridge over the railway off Mane Way/ Oldfield Road, to combat traffic congestion and improve air quality, and sustainable transport links.
- Town centre regeneration, to reduce traffic problems, improve the range of shops and pedestrian safety.
- Little demand for further employment provision, with Hawke Ridge largely unbuilt and proposed housing near the railway station likely to benefit commuters.
- More development on the east of the town has led to declining numbers for primary schools on the west of the town.

**Main issue(s) raised:**

- The ability of Westbury's transport, education, and town centre facilities to accommodate further residential development.
- Need to consider the employment evidence and existing employment land commitments.

## Supporting evidence

6.42. A summary of comments from specific consultation bodies can be found within Table 41.

*Table 41: Provides a summary of comments from specific consultation bodies on the supporting evidence.*

<b>Comments from specific consultation bodies</b>
<p><b>Network Rail</b></p> <ul style="list-style-type: none"><li>• Transport Review - it is not clear how public transport modes are accounted for in the Wiltshire transport model.</li><li>• The public transport mitigation measures aren't very ambitious.</li><li>• No mention is made of any aspiration for new or re-opened stations in Wiltshire.</li><li>• 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.</li><li>• There is no reference to the developing Wiltshire rail strategy that is being supported by Network Rail, Great Western Railway and South Western Railway.</li><li>• Rail industry led work, specifically the strategic study for the West of England line is disregarded, this being particularly relevant for Salisbury.</li><li>• Properly aligned planning amongst industry stakeholder groups can ensure that rail plays a crucial role in supporting growth</li><li>• Further, new development should be concentrated and consolidated at or close to existing and proposed rail infrastructure and hubs.</li><li>• 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.</li><li>• There is no assessment of the potential impact that these enhancements could have, by helping to identify where sustainable investment should be focused.</li></ul> <p><b>Highways England</b></p> <ul style="list-style-type: none"><li>• Transport Review - Highways England has been engaged on the production of the base year for this model (2018) and accept the model as an appropriate base for the assessment. The principle of the scenario structure is reasonable.</li><li>• The forecasting of trip demand from the proposed allocations has utilised trip rates from TRICS. This provides a good clarity on the rates being used.</li><li>• Section 2.3 - Do-Nothing and Do-Minimum infrastructure assumptions. These are considerable, and assuming delivery of some schemes carries some risk.</li><li>• Section 3 - of the report considers the mitigation of the Local Plan. We are content with this approach.</li></ul>

- Standard methodologies have been used to assess the likely modal shift from car-based trips and this is welcome.
- M4 Junction 17 is specifically mentioned as a pinch-point. Highways England want to work with Wiltshire Council to identify appropriate mitigation.
- The promotion of active modes is welcome from a wider sustainability and health point of view.
- The report describes a number of substantial new road schemes. The combination of schemes will impact on the strategic road network and it's important to how the delivery of the schemes will relate to the delivery of the proposed allocations.
- A major road network scheme has been developed for M4 Junction 17 and Highways England are working with the Council on this scheme.

#### **Natural England**

- Habitat Regulations Assessment (HRA) - 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.
- HRA – Natural England agrees with the approach taken to assess European sites within and extending beyond the county boundary. All European sites have been identified correctly for HRA screening.
- Sustainability Appraisal (SA) - the SA 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 Green Infrastructure in addressing the effects of climate change and the health benefits of enhancing access to green space and active travel. SA is an important tool for furthering integration of objectives and policies and avoiding 'trade-offs' between what can be viewed as conflicting goals.
- HRA and SA - 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.

#### **Sport England**

- The Wiltshire Playing Pitch Strategy is a key document which underpins the Local Plan. Whilst it is coming to the end of its life, it has been updated regularly since its adoption and is due to be completely refreshed in 2022.

6.43. A summary of the main issues raised, against each consultation question, can be found within Table 42.

*Table 42: Provides a summary of comments, alongside main issues, on the supporting evidence.*

**Document:** Interim Sustainability Appraisal (SA)

**Principal line(s) of argument:**

- General support for the methodology used in the SA, including testing of higher and lower housing requirements and different distributions within HMAs. Most responses were from landowners/agents who agree where SA recommends higher growth options in settlements where they are promoting sites. In settlements where the SA recommends less growth due to higher environmental constraints, landowners/agents suggest higher figures would be sustainable but important for the SA to assess individual sites which they are promoting which they claim will have more sustainability benefits and less adverse impacts than other sites.
- General support for SA having a greater focus on climate change issues and increasing biodiversity gains.

**Main issue(s) raised:**

- The September 2020 SA Scoping Report doesn't seem to be available as part of this consultation.
- Comments that the SA should assess higher levels of growth in rural areas which would have a positive effect on housing affordability.
- Failure to consider alternative distribution options between HMAs is an oversight and something that should also be subject to the SA process.
- SA has assessed distribution options for each HMA on the basis of out-of-date employment land evidence and not considered current market signals i.e., it does not account for the potential impacts of Brexit and COVID-19.
- SA needs to assess all reasonable alternatives, including assessing higher housing figures at market towns with fewer constraints e.g., Calne and Devizes. Also, the potential of a new settlement in the Chippenham HMA to support growing the towns through major urban extensions.
- Objection to the way the SA has dealt with climate change impacts and other environmental impacts for levels of growth and different sites at Chippenham, stating that environmental impacts will be far greater than the SA concludes, and the methodology used is flawed.
- When assessing potential development strategies, the SA should take a positive approach to considering the needs and opportunities of individual settlements.
- Concern that the SA does not meet relevant legal requirements as site assessments not based on up-to-date and robust evidence.
- The objectives have only been considered in isolation.

**Document:** Local Transport Review (LTR)

**Principal line(s) of argument:**

- The Local Transport Review (LTR) is too heavily focused on traffic modelling. Further reference is needed on rail proposals, public transport provision and walking and cycling schemes more information and investment required.
- Evidence should be updated (2018 baseline out of date). Particularly to reflect changes in behaviour linked to the climate change emergency and the impacts of the covid pandemic e.g. working from home. Lack of monitoring.
- Currently the LTR focuses on the Principal Settlements and more detailed work is required for the market towns
- Comments were made on the evidence for the proposed Chippenham link road and Melksham Bypass.

**Main issue(s) raised:**

- Impact of traffic on country lanes should be assessed.
- Chippenham – the requirement for an eastern link road has not been established and the evidence for it is not sufficient. The traffic modelling is biased towards the eastern link road. More consideration should be given to a southern link road. The impact on surrounding villages is not assessed.
- It is premature for the LTR to show a specific alignment for a Melksham Bypass.
- There is not enough in the LTR on reducing emissions.
- Rail – The review supports bus transport on the A350 instead of the TransWilts railway line. The aspiration to improve access to train stations to promote rail travel is unsustainable.
- Rail – South Western Railway state that there is a lack of multi modal modelling to test different infrastructure investment options. Analysis in the review is highways heavy. The road trip modelling is focused on the total number of vehicles on the road and there is no analysis of origin and destination of journeys. The use of rail is underestimated.
- There is no reference to the Western Gateway Rail Strategy or the developing Wiltshire Rail Strategy. The role of rail needs to be amplified.
- Principles for travel by bus are not very ambitious.
- The proposals for new railway stations such as Corsham, Westbury, Royal Wootton Bassett and Grove and Wantage are not referred to.
- How is the modelling carried out when specific locations for growth at the market towns are not known?
- The Local Transport Plan 3 is not fit for purpose in the context of climate and biodiversity issues. The production of the Local Transport Plan 4 should be sped up and should reflect the need to decrease need and demand for travel, encourage modal shift, increase public transport and better consider demand management.
- The hierarchy of interventions to mitigate development is welcomed but it is not reflected in schemes in Salisbury or elsewhere.

<b>Document:</b> Level 1 Strategic Flood Risk Assessment (SFRA)
<p><b>Principal line(s) of argument:</b></p> <ul style="list-style-type: none"> <li>• Assessment of flood risk needs to be updated and needs to consider more the impacts of climate change, cumulative development and ground water flooding.</li> </ul>
<p><b>Main issue(s) raised:</b></p> <ul style="list-style-type: none"> <li>• The SFRA appendices maps need to be made available. The Ground Water Strategy needs to be made available. Appendix Q is missing a major flood event in Downton.</li> <li>• Information needs to be up to date and issues such as on how ground water flooding, impacts of climate change and the impacts of cumulative development needs is taken into account.</li> <li>• The flood assessment for land east of Chippenham is not appropriate as there have been numerous flood issues. Bremhill Parish Council state that the plan over allocates in environmentally sensitive areas least attractive for flood issues.</li> <li>• Planning should be done for the whole flood catchment area.</li> </ul>
<b>Document:</b> Functional Economic Market Area (FEMA) Assessment / Employment Land Review
<p><b>Principal line(s) of argument:</b></p> <ul style="list-style-type: none"> <li>• The economic evidence is out of date and should be reviewed to reflect the NPPF and recent economic trends. Employment land requirements in the Local Plan Review should be reviewed.</li> <li>• Further assessment is needed of the role of logistics and distribution in light of changing trends due to the covid pandemic, changing consumer behaviour and the role of the M4.</li> </ul>
<p><b>Main issue(s) raised:</b></p> <ul style="list-style-type: none"> <li>• The economic evidence is out of date and is not consistent with paragraph 31 of the NPPF. It does not respond to the potential of Wiltshire to meet regional and national needs. There is a lack of monitoring. There is no justification for such a small quantum of employment land to 2036. There should be a review of supply.</li> <li>• Industry and logistics development along the M4 corridor <ul style="list-style-type: none"> <li>○ The promoter of land south east of junction 17 commented on the assessment of industry and logistics in the studies. There is an absence of market demand for industry and logistics. The ELR has not captured the historic growth of industry and logistics, the boom from the covid pandemic or the forecasted unprecedented growth in response to</li> </ul> </li> </ul>

<p>technical innovation, changes to consumer behaviour and stock piling. Savills estimate that 1.99 million square foot of warehouse space is needed by 2030</p> <ul style="list-style-type: none"> <li>○ The role of storage and distribution is underplayed. Including storage and distribution with the industry category limits the opportunity to meet the needs of logistics. Consideration of take up of land since 1996 is unreliable and influenced by land supply and old policy</li> <li>○ Junction 17 falls within the Swindon/M4 corridor and the A350 and west/Central West Wilts Towns Functional Economic Market Areas (FEMA). In subsequent stages of assessment that seek to match FEMAs to Housing Market Areas junction 17 is erroneously put in the A350 FEMA. But it also falls within the Swindon/M4 Corridor FEMA. The A350 does not have enough regard to the M4 as a driver for demand</li> <li>○ The Local Plan review disregards conclusions that new allocations are needed near the M4</li> </ul> <ul style="list-style-type: none"> <li>● The ELR states it should be regularly reviewed by updating the supply assessment annually and demand assessment at least every 5 years – this has not happened.</li> <li>● The Emerging Spatial Strategy fails to recognise that the ELR suggests that employment demand could be tweaked</li> <li>● The promoter of a site in Calne recognises that employment has stagnated in Calne and the relocation of the Atwell Wilson Motor Museum could help this.</li> <li>● The promoter of a site in Malmesbury recognises the ELR state that further employment allocation in Malmesbury may be needed and suggest housing should be reviewed accordingly.</li> </ul>
<p><b>Document:</b> Local Housing Needs Assessment (LHNA)</p>
<p><b>Principal line(s) of argument:</b></p> <ul style="list-style-type: none"> <li>● The Local Housing Needs Assessment is out of date as it is based on Core Strategy policies and it does not reflect the impacts of the COVID pandemic or Brexit.</li> </ul>
<p><b>Main issue(s) raised:</b></p> <ul style="list-style-type: none"> <li>● The minimum figure of 40840 is recognised but the evidence in the report also suggests a further 6300 dwellings are needed to enable workers to live in Wiltshire. Enough sites need to be allocated to support local jobs as well as local housing needs, for example, in Malmesbury.</li> </ul>
<p><b>Document:</b> Chippenham HMA: Formulating Alternative Development Strategies</p>
<p><b>Principal line(s) of argument:</b></p>

<ul style="list-style-type: none"> <li>• There should be further explanation of how the spatial strategy and quantum of development at each place has been reached as well as consideration of spreading development through the HMA.</li> </ul>
<p><b>Main issue(s) raised:</b></p> <ul style="list-style-type: none"> <li>• A range of choice and supply should be provided in the Chippenham HMA. Developers have put forward sites at market towns in the Chippenham HMA and argue for a greater spread of development rather than a focus on Chippenham or Melksham.</li> <li>• A strategic site should be provided in Devizes instead of smaller sites, this would help provide infrastructure.</li> <li>• In Malmesbury the ELR forecast undersupply and an employment allocation would be beneficial – this is not reflected in the ADS. There should be higher levels of growth in Malmesbury and the surrounding area.</li> <li>• A greater allowance for new homes should be made for rural settlements. The need for Colerne should be met a Colerne and could help support the ICT business cluster grow in Corsham.</li> </ul>
<p><b>Document:</b> Salisbury HMA: Formulating Alternative Development Strategies</p>
<p><b>Principal line(s) of argument:</b></p> <ul style="list-style-type: none"> <li>• There is a lack of coordinated waymarked and convenient facilities for pedestrians and cyclists in Salisbury. The Local Plan should address these deficiencies as a priority given the hierarchy of interventions outlined in the Local Transport Review and the ambition to reduce carbon emissions to net zero by 2030, well within the timescale of the Plan.</li> </ul>
<p><b>Main issue(s) raised:</b></p> <ul style="list-style-type: none"> <li>• Salisbury may have a plan for a cycle network, but it is largely aspirational, is incomplete and has not been added to since 2009, despite numerous housing developments constructed in the last 10-15 years. Is the estimated funding enough to complete the existing network as well as new facilities outlined in the Local Transport Review?</li> </ul>
<p><b>Document:</b> Retail and Town Centre Study (2020)</p>
<p><b>Principal line(s) of argument:</b></p> <ul style="list-style-type: none"> <li>• The impact of the covid pandemic needs to be factored into the retail evidence.</li> </ul>
<p><b>Main issue(s) raised:</b></p> <ul style="list-style-type: none"> <li>• The Local Plan review policies for retail need to be sufficiently flexible to respond to this and other change.</li> <li>• In Tisbury commercial space has been lost to residential and retail policies should be strengthened for high streets.</li> </ul>

- The covid pandemic has sped up change in the high street. The study and the Salisbury Central Area Framework should be updated to reflect this and potentially to reflect residential use on the town centre, re use of brownfield land and less pressure on greenfield land accordingly.

**Document:** Habitats Regulations Assessment (HRA) Scoping Report

**Principal line(s) of argument:**

- Natural England agree with the approach taken in the HRA and agree that all European sites have been identified correctly for HRA screening.
- There is some criticism of the HRA with regards to assessing Core Sustenance Zones (CSZ) and Zones of Influence for bats in relation to both Bath and Bradford on Avon Bats Special Area of Conservation (SAC) and Mells Valley SAC.

**Main issue(s) raised:**

- The overall conclusion that potential impacts of planned development in Wiltshire on the New Forest SAC, SPA and Ramsar sites should be 'scoped in' to future HRA work is fully supported by New Forest National Park Authority.
- Suggest the HRA has regard to up-to-date research on visitor patterns in the New Forest (Footprint Ecology, 2020) and the follow up work definition a 'zone of influence' for the New Forest SPA/SAC and Ramsar sites and the HRA has regard to this research as the work on the Wiltshire LPR progresses.
- The premise of the screening assumption is flawed. The sites are screened in or out based on the CSZ range in km, but this relates to summer foraging ranges of (primarily) maternity roosts. The Bath and Bradford on Avon Bats SAC is not simply as a summer site. For all other ecological functions, the catchment of the bat populations is much greater than these CSZs. It could be a serious failing of the HRA if this value is not recognised and taken into account, substantially undervaluing the potential impacts upon all the qualifying species of the site.
- Mells Valley SAC should not be scoped out.
- There is an assumption of a 500m distance to scope in European sites for non-physical disturbance – including lighting. However, the catchment for bats at swarming and winter sites is much greater than 500m, so there is potential for significant impacts on qualifying feature bat populations caused by lighting.

## 7. Next steps

### Summary of main issues and actions

- 7.1. Collectively the comments represent a wide range of views and reinforce the need to further develop the Council's evidence in particular on housing and employment need, as well as the potential for renewable and off grid energy in Wiltshire and acceleration of zero carbon development.
- 7.2. Representations indicate Wiltshire remains a highly attractive location for the development industry and it continues to press for wider opportunities. However, in general terms, local communities are cautious about further growth, particularly at the higher end of the range that was consulted upon. Concerns revolve around environmental issues, ability for infrastructure to cope (particularly health, education and transportation) and the view that while significant housing has taken place this has not been matched with new jobs.
- 7.3. In general, the need to plan sustainably for Wiltshire is an underlying theme raised through the consultation response, with the importance of addressing and adapting to climate change, the health and well-being of communities and well-designed places being important components. There are clear concerns from the local community about growth and the need for infrastructure to keep pace with development. Concerns have been expressed also about: the loss of valued landscapes around towns and coalescence with outlying villages, and not enough emphasis on brownfield land reuse. There were some calls for new settlements as part of an alternative strategy, but no specific proposals put forward other than a cross boundary proposal promoted by a developer (the majority of which relates to Cotswold District) for a new community of 2,000 homes at Kemble Airfield.
- 7.4. Utilising the key themes presented as part of the consultation, Table 5 presents a summary of overarching issues, and associated actions, arising from the consultation.

*Table 43: Presents a summary of main issues against key themes embedded within the consultation, also listing some of the actions necessary to consider these main findings.*

### **Housing growth**

#### **Summary of main issues:**

The consultation sought to test the upper end of a range of housing need of 40,840 to 45,630 homes for Wiltshire<sup>4</sup>.

There was a clear divergence of views, with many considering that the impacts on the environment (e.g. landscape, biodiversity and carbon footprint) and/or infrastructure were too great for the higher or lower number. Conversely, the development industry was generally either supportive of the higher number or considered it should be raised further to boost housing and deliver more affordable homes. It was also suggested that the base date of the plan be reset (from 2016) and the plan period extended (from 2036) to allow for 15 years from adoption. A main criticism about the higher figure was that the job forecasts that informed the figure were out of date and that the more recent events of COVID-19 and Brexit would suppress job growth, and thus reduce homes arising from that method.

**Key actions:**

In the light of the consultation response and national policy, it is considered that further work needs to be undertaken to refresh the Council's evidence on housing need. This includes updating the minimum standard methodology figure to consider new affordability data; updating the employment projections to inform the jobs / workers balance and understand the economic implications of COVID-19 and Brexit.

**Employment growth**

**Summary of main issues:**

Concerns were raised about the employment evidence underpinning the need for additional employment land and its reliance on dated job growth forecasts that do not reflect the impact of COVID-19 and Brexit. In addition, challenges were made about how much and where new employment land was proposed, including the promotion of land at both Junctions 16 and 17 of the M4 motorway for strategic employment use and concerns raised about the need to deliver more jobs to allow people to live and work locally.

General concerns were also expressed about the need to plan for the regeneration of town centres, recognising their importance for the communities they serve and local economy.

**Key actions:**

A review of the evidence to reflect a post Brexit and pandemic world is needed to ensure there is a sound basis on which to plan for the employment needs of different sectors in the right locations.

Further work will be undertaken to develop a policy framework to support and facilitate positive change within centres.

**Distribution of growth**

**Summary of main issues:**

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<sup>4</sup> As identified in the Swindon and Wiltshire Local Housing Need Assessment (LHNA) prepared by Opinion Research Services in April 2019, for the period 2016 to 2036. The lower figure reflected the Government's standard methodology for new homes (the minimum number that a Local Plan must plan for) and the higher figure reflected local evidence that suggested Wiltshire will need more homes to balance forecast job growth and the working age population

The Local Housing Needs Assessment<sup>5</sup> firstly defined Wiltshire's Housing Market Areas (4 in total) and then distributed the growth at both ends of the range to these. As Wiltshire is so large distributing growth by Housing Market Area (HMA) ensures that homes are delivered where they are needed.

In simple terms, using the upper end of the range for each HMA a distribution of growth was proposed for the main settlements and the rural parts of each HMA. In the rural parts of the HMAs, housing numbers were proposed for the Local Service Centres and Large Villages as the most sustainable locations for growth after the market towns.

At the main settlements, generally there were mixed views expressed about the proposed scales of growth for each place, with reasons given for these. With at one end some local community representatives not wishing to see any growth at all to the other end where the development industry wishes to see higher levels of growth. At the rural areas, some felt that the level of growth was too high, while others thought it was not enough.

The main concerns revolve around the environmental issues, ability for infrastructure to cope and the view that while significant housing has taken place this has not been matched with new jobs.

**Key actions:**

All the views expressed will need to be looked at to ensure a fair and proper consideration of the issues they raise.

Further work is being undertaken to consider an appropriate response to the consultation comments made and what revisions should be made to the spatial strategy. This will include identifying where changes may be justified to the scales of growth at the main settlements, as well as the preferred sites, and further detailed site assessment work to identify allocations for the draft Local Plan.

Example actions include:

- A critical part of the evidence base for the spatial strategy and distribution of growth will be further transport studies. These will consider, in simple terms, how self-containment of settlements could be improved to influence trip generation and reduce the need to travel, how a shift towards active travel and sustainable modes could be achieved; and to what extent this could reduce the reliance on the car and new road infrastructure. Investigation will also examine what transportation infrastructure would be needed to support the spatial strategy (considering any revisions) and to form particular requirements for allocated sites.
- Evidence relating to the deliverability of existing brownfield opportunity sites with our main settlements will be developed.

**Rural settlements**

**Summary of main issues:**

There were some calls to reclassify the status of several villages in the settlement strategy, which generally appear to be motivated on the basis that a smaller classification would mean less growth or a larger classification more growth.

The methodology to determine, and levels of, housing proposed for Large

<sup>5</sup> Swindon and Wiltshire Local Housing Need Assessment (LHNA) prepared by Opinion Research Services in April 2019.

Villages and Local Service Centres was challenged based on being too complex, or conversely a belief the method should consider further factors. This was accompanied with calls that Local Service Centres should be considered as strategic settlements with allocations made through the Local Plan, and less reliance placed on neighbourhood planning to deliver housing in the rural areas. Similarly, it was suggested that some Large Villages could also be considered as having a different strategic role borne out of their proximity to larger settlements.

**Key actions:**

Any changes to settlement classification will need to be looked at on an evidential basis to see if their role, function and the services/facilities they contain has changed substantially since they were first designated to justify any change.

**Climate change**

**Summary of main issues:**

Comments generally fell into two groups. The first, those with environmental interests including general public and some parish/town councils, who felt the Local Plan should be more aspirational in terms of achieving zero carbon targets, particularly in terms of new development. In addition, this group of comments also considered that more emphasis should be placed on biodiversity enhancement, including placing open spaces at the heart of all new development.

The second group of comments included a significant lobby from the development industry who stressed a rapid transition to net zero carbon development would be unduly costly. Developers questioned the Council's evidence on the true costs of building to zero carbon standards. However, little evidence on such matters was submitted to illuminate their assertions.

**Key actions:**

In the light of the consultation response, the legal duty<sup>6</sup> to ensure the policies of the Local Plan address climate change, national policy and the Council's climate emergency declaration, it is considered that further work (alongside the transport evidence referred to above) needs to be undertaken to refresh the Council's evidence. This will include undertaking:

- A Wiltshire-wide assessment of renewable energy potential
- An objective assessment of the cost of delivering zero carbon housing and commercial development (to feed into an overall Local Plan viability assessment).
- An assessment of the potential for local energy networks at main settlements and the opportunity to identify potential off-grid energy sources.

7.5. Generally, concerns varied from settlement to settlement. Understanding each of these issues and concerns form an important part of the work going forward. The results of this consultation form an invaluable and central part of plan preparation, which will need to be considered fully alongside the development of new evidence to inform policies within the draft Plan. Whilst recognising the clear concerns of the local community the Local Plan must be prepared based on objective assessments of

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<sup>6</sup> Planning and Compulsory Purchase Act 2004, Section 19.

needs for housing and employment and a comprehensive appraisal of the evidence.

- 7.6. It is good practice to update the evidence base for a Local Plan throughout the plan's preparation. The consultation has led to a clear need for the Council to undertake further technical evidence on a range of issues. Updated evidence on growth forecasts is now needed to accurately inform the content of the draft Local Plan. In particular, the Council needs to look again at the range of housing needs to ensure it is evidence based and an appropriate deliverable housing requirement can be set for Wiltshire. A review of the evidence may lead to changes at housing market area level and the allocations within them. An integral part of the work moving forward will also involve considering what infrastructure will need to be planned for alongside housing growth. Further evidence is also needed to inform our future direction on renewable energy, off-grid energy and zero carbon development.
- 7.7. Wiltshire Council's Cabinet on 29 June 2021 formally agreed to further work being undertaken in response to the consultation on key parts of the evidence base, including:
- Testing the upper and lower levels and spatial distribution of the range of housing need for the plan period;
  - A review of the employment evidence underpinning need for new employment land; and
  - Wiltshire-wide assessment of potential for renewable energy, zero carbon development and off grid energy networks at settlements.

### **What's next?**

- 7.8. Now the consultation has been completed all representations will be considered in preparing the draft Plan and further work undertaken in response to these to develop evidence to inform its policies. Once the draft Plan is prepared this will be considered by Wiltshire Council's Cabinet and Council before the Plan is published and a final stage of consultation is undertaken - known as the Regulation 19 Town and Country Planning (Local Planning) (England) Regulations 2012 stage.
- 7.9. Once the Regulation 19 consultation stage is complete, the next stage will be for the Council to submit the draft Plan to the Secretary of State for independent examination by a Government appointed Inspector.
- 7.10. Through the examination process, the Council will need to demonstrate that the Plan has been prepared in accordance with legal and procedural requirements and that it is "sound". The tests of soundness are set out in national planning policy<sup>7</sup>.

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<sup>7</sup> National Planning Policy Framework (paragraph 35)

7.11. An illustration of where we are currently in the overarching local plan process can be found overleaf at Figure 1.



# Wiltshire Council LOCAL PLAN

Looking to the future

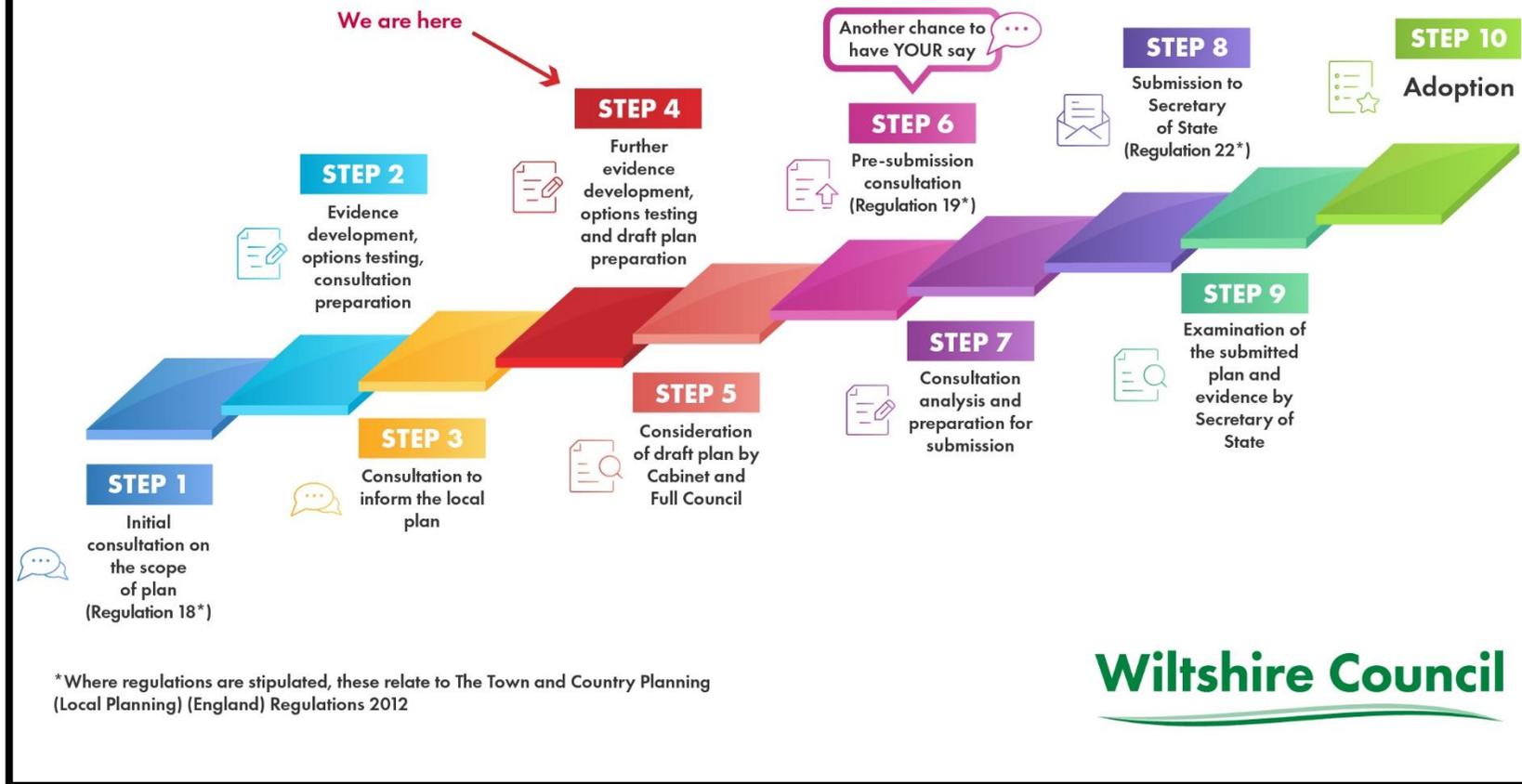


Figure 1: Infographic illustrating the local plan preparation process, highlighting where Wiltshire currently sits within this process.



## **Appendix 1**

Please see overleaf a copy of the notification email sent to all those on the Spatial Planning mailing list. This copy represents the notification sent on 06/01/21. Other notifications were also sent on 13/01/21, 22/02/21, 23/02/21.



6 January 2021

Dear Resident

#### **Wiltshire Local Plan review consultation**

The consultation into the Wiltshire Local Plan review, and separately the Gypsy and Traveller Local Plan, will run from Wednesday 13 January 2021 until 11:59pm on Tuesday 9 March 2021.

Wiltshire Council has to allocate sufficient land to satisfy housing and employment needs up to 2036, and is seeking the views of local communities and stakeholders to see if the suggested distribution of numbers across the county is correct, and which of the proposed sites are most suitable.

Feedback during this review consultation will help to shape the draft Local Plan, which will be finalised later in 2021. It will then be used to guide decisions on whether future planning applications for housing, infrastructure and land for employment can be granted.

As COVID restrictions mean that face-to-face events will not be possible during this review, the council is holding a series of online events for people to find out more about the Local Plan. Each event relates to a particular settlement, and there are also two events for rural areas, which include all other Wiltshire villages and settlements that are not covered in the other 15 events.

The online events, which will be held from 7pm-8pm on the dates shown are as follows:

- Planning for Calne, Monday 18 January
- Planning for Corsham, Tuesday 19 January
- Planning for Royal Wootton Bassett, Tuesday 19 January
- Planning for Chippenham, Wednesday 20 January
- Planning for Tidworth and Ludgershall, Wednesday 20 January
- Planning for Malmesbury, Thursday 21 January
- Planning for Amesbury, Thursday 21 January
- Planning for Marlborough, Monday 25 January
- Planning for Bradford on Avon, Monday 25 January
- Planning for Westbury, Tuesday 26 January
- Planning for Salisbury, Tuesday 26 January
- Planning for Devizes, Wednesday 27 January
- Planning for Trowbridge, Wednesday 27 January
- Planning for Melksham, Thursday 28 January
- Planning for Warminster, Thursday 28 January
- Planning for rural areas, Monday 1 February and Tuesday 2 February

[Sign up for an event](#)

[Find out more about the local plan](#)

#### **Gypsy and Traveller Local Plan consultation**

The Gypsy and Traveller Local Plan consultation will also take place at the same time, from Wednesday 13 January 2021 until 11:59pm on Tuesday 9 March 2021. In line with Government planning policy and legislation, the plan will look to allocate land for travellers in sustainable locations to meet their permanent and temporary accommodation needs up until 2036.

[Find out more about the Gypsy and Traveller Local Plan](#)

## **Appendix 2**

Please see overleaf a transcript of the notification letter sent to all those on the Spatial Planning mailing list requesting postal notification. This copy represents the notification letter sent week commencing 11/01/21 marking the beginning of the consultation.

January 13th 2021

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

Dear Sir/Madam,

**Consultations to inform the Wiltshire Local Plan review and the proposed scope and content of the Gypsies and Travellers Development Plan Document**

Consultation on the Wiltshire Local Plan review and the proposed scope and content of the Gypsies and Travellers Development Plan Document is being undertaken over the period from **13 January to the 9 March 2021**.

This notification letter invites you to participate in these consultations and provides details of how you can access documents, particularly if you do not have access to the internet. What follows is a brief summary of each consultation and how to find out more about the consultations.

**Wiltshire Local Plan Review**

The consultation will enable people to comment and help shape the content of the draft Wiltshire Local Plan Review, which is due for publication towards the end of 2021. This round of consultation builds on earlier engagement with the community and other stakeholders undertaken since 2017.

The published consultation materials include: an emerging strategy for guiding where future development - such as new homes and land for employment - in the period to 2036 will be planned for, including in each of the County's main towns and city; a planning framework for managing development in rural areas, particularly new homes; and the opportunity to provide feedback on how the Council's planning policies can be shaped to address climate change.

In addition, to the main consultation documents, the Council has prepared a number of supporting documents. The consultation documents and supporting documents including information on how to respond are available on the Council's website at:

<https://www.wiltshire.gov.uk/planning-policy-local-plan-review-consultation>.

Alternatively, if you do not have access to the internet and wish to speak to an officer to find out more about the consultation, or request a hard copy of the consultation documents please contact the Council by email [spatialplanningpolicy@wiltshire.gov.uk](mailto:spatialplanningpolicy@wiltshire.gov.uk) or by telephone 0300 456 0100 and ask to speak to an officer in the Spatial Planning Service.

Representations should focus on the questions asked in the published documents. Representations can be submitted via the Council's website (link above) or via email to [spatialplanningpolicy@wiltshire.gov.uk](mailto:spatialplanningpolicy@wiltshire.gov.uk) using the response forms available on the Council's website, or on request. Alternatively, please send your representations to: Spatial Planning, Economic Development and Planning, Wiltshire Council, County Hall, Trowbridge, BA14 8JQ.

To support the Local Plan review consultation, the Council is running a series of online events late January and early February 2021 via Microsoft Teams Live Events. Unfortunately, due to the COVID pandemic we are not able to hold face to face events. If you have access to the internet, details of these events and how to register your interest to attend can be found at: [https://www.wiltshire.gov.uk/planning-policy-local-plan-review Council](https://www.wiltshire.gov.uk/planning-policy-local-plan-review-Council) or provided by contacting [spatialplanningpolicy@wiltshire.gov.uk](mailto:spatialplanningpolicy@wiltshire.gov.uk), or 0300 456 0100.

### **Gypsies and Travellers Development Plan Document**

We are also consulting on the proposed scope and content of the Gypsies and Travellers Plan, which will look to allocate land for travellers in sustainable locations to meet their permanent and temporary accommodation needs up until 2036.

The consultation document and supporting evidence (the Gypsy and Traveller Accommodation Assessment, Opinion Research Services, 2020) has been published on the Council's website. To view these documents and find out more about the Gypsies and Travellers Plan and how to comment, go to [www.wiltshire.gov.uk/planning-gypsy-travellers](http://www.wiltshire.gov.uk/planning-gypsy-travellers).

Representations can also be emailed to: [spatialplanningpolicy@wiltshire.gov.uk](mailto:spatialplanningpolicy@wiltshire.gov.uk). Alternatively, please send your representations to: Spatial Planning, Economic Development and Planning, Wiltshire Council, County Hall, Trowbridge, BA14 8JQ.

As with the Local Plan review consultation, if you do not have access to the internet or email, please ring the Council on 0300 456 0100 and ask to speak to an officer within the Spatial Planning Service for further information or to request hard copies of documents.

Yours Faithfully,

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## **Appendix 3**

Please see overleaf a copy of the notification sent to all those on the Wiltshire Council email newsletter distribution list sent to residents. This copy represents the notification sent on 13/01/21. In total nine notifications were sent between 13/01/21 and 05/03/21.



13 January 2021

## The Wiltshire Local Plan and Gypsy and Travellers Plan consultations begin today

The consultation on the Wiltshire Local Plan review starts today, so you can now have your say on where future development – including housing, infrastructure and land for employment – may be built in your area in the next 15 years. The consultation will also look to develop our planning policies to help tackle climate change.

We have to allocate sufficient land to satisfy the county's housing and employment needs up to 2036, and in this consultation, you will be able to give your feedback on whether the suggested distribution of housing numbers across the county is correct, and which of the proposed development sites are most suitable.

Don't forget, you can still also sign up for one of our online engagement sessions to find out more about the potential sites in your area. There are 17 events; 15 that each relate to a particular settlement, and two events for rural areas, which include all other Wiltshire villages and settlements not covered in the other 15 events.

To find out more about the Local Plan review, view documents, have your say, and sign up for one of the online engagement sessions, go to [www.wiltshire.gov.uk/planning-policy-local-plan-review](http://www.wiltshire.gov.uk/planning-policy-local-plan-review)

In addition, we are also consulting on the proposed scope and content of the Gypsies and Travellers Plan, which will look to allocate land for travellers in sustainable locations to meet their permanent and temporary accommodation needs up until 2036. To find out more about the Gypsies and Travellers Plan, go to [www.wiltshire.gov.uk/planning-gypsy-travellers](http://www.wiltshire.gov.uk/planning-gypsy-travellers)

Both consultations end on Tuesday 9 March 2021.

[Find out more](#)

## **Appendix 4**

Please see overleaf a copy of the notification sent to all those on the Wiltshire Council email newsletter distribution list sent to businesses. This copy represents the relevant extract of the notification email sent on 19/02/21. In total three notifications were sent between 19/02/21 and 05/03/21.



19 February 2021



# Wiltshire Council LOCAL PLAN

Looking to the future

**Don't forget to let us know what you think about the Wiltshire Local Plan**

The consultation on the Wiltshire Local Plan review is open until 9 March, so please have your say on where housing, infrastructure and land for employment may be built in your area in the next 15 years.

Plus, if you attended one of our online engagement sessions, the write-ups of all the events have been added to our Local Plan review webpage.

To find out more about the Local Plan review, view documents and have your say, go to [www.wiltshire.gov.uk/planning-policy-local-plan-review](http://www.wiltshire.gov.uk/planning-policy-local-plan-review).

[Find out more](#)



## **Appendix 5**

Please see overleaf a copy of the notification sent to all those on the Wiltshire Council email newsletter distribution list sent to members. This copy represents the notification sent on 13/01/21. In total seven notifications were sent between 13/01/21 and 05/03/21.

# WILTSHIRE COUNCIL UPDATE

Wiltshire Council

13 January 2021

## **The Wiltshire Local Plan and Gypsy and Travellers Plan consultations begin today**

Dear Members,

The Local Plan review consultation begins today, giving your communities the opportunity to have their say on where future development – including housing, infrastructure and land for employment – may be built in their area for the next 15 years. The consultation will also look to develop our planning policies to help tackle climate change.

Don't forget, starting on Monday, we're also holding a series of online engagement sessions to enable people to find out more about the potential sites in their area. There are 17 events; 15 that each relate to a particular settlement, and two events for rural areas, which include all other Wiltshire villages and settlements that are not covered in the other 15 events.

To find out more about the Local Plan review, view documents, have your say, and sign up for one of the online engagement sessions, go to [www.wiltshire.gov.uk/planning-policy-local-plan-review](http://www.wiltshire.gov.uk/planning-policy-local-plan-review)

In addition, we are also consulting on the proposed scope and content of the Gypsies and Travellers Plan, which will look to allocate land for travellers in sustainable locations to meet their permanent and temporary accommodation needs up until 2036. To find out more about the Gypsies and Travellers Plan, go to [www.wiltshire.gov.uk/planning-gypsy-travellers](http://www.wiltshire.gov.uk/planning-gypsy-travellers)

Both consultations end on Tuesday 9 March 2021.

**Communications Team**  
**Corporate Services**

[Find out more](#)

## **Appendix 6**

Please see overleaf a copy of the notification sent to all those on the Wiltshire Council email newsletter distribution list sent to parish and town councils. This copy represents the notification sent on 13/01/21. In total six notifications were sent between 13/01/21 and 05/03/21.



13 January 2021

## **The Wiltshire Local Plan and Gypsy and Travellers Plan consultations begin today**

The Local Plan review consultation begins today, giving your communities the opportunity to have their say on where future development – including housing, infrastructure and land for employment – may be built in their area for the next 15 years. The consultation will also look to develop our planning policies to help tackle climate change.

Don't forget, starting on Monday, we're also holding a series of online engagement sessions to enable people to find out more about the potential sites in their area. There are 17 events; 15 that each relate to a particular settlement, and two events for rural areas, which include all other Wiltshire villages and settlements that are not covered in the other 15 events.

To find out more about the Local Plan review, view documents, have your say, and sign up for one of the online engagement sessions, go to [www.wiltshire.gov.uk/planning-policy-local-plan-review](http://www.wiltshire.gov.uk/planning-policy-local-plan-review)

In addition, we are also consulting on the proposed scope and content of the Gypsies and Travellers Plan, which will look to allocate land for travellers in sustainable locations to meet their permanent and temporary accommodation needs up until 2036. To find out more about the Gypsies and Travellers Plan, go to [www.wiltshire.gov.uk/planning-gypsy-travellers](http://www.wiltshire.gov.uk/planning-gypsy-travellers)

Both consultations end on Tuesday 9 March 2021.

**Communications Team**  
**Corporate Services**

[Find out more](#)

## **Appendix 7**

Please see overleaf a copy of the public notice placed within local newspapers during week commencing 11/01/21. This public notice was included within the Wiltshire Times, Salisbury Journal and the Wiltshire Gazette and Herald.

#### Section 14(1) of the Road Traffic Regulation Act 1984

Notice is hereby given that the Wiltshire Council has made an Order to close temporarily to all traffic: **Downham Mead (Part), Chippenham**; from its junction with Cocklebury Road for a distance of approximately 10 metres in a southerly direction to enable Wales & West Utilities Ltd to carry out gas mains and service replacement. Alternative route: via Downham Mead (unaffected length) – Sadlers Mead – Esmead – Cocklebury Road and vice versa. **The closure and diversion route will be clearly indicated by traffic signs.** This Order will come into operation on 18 January 2021 and the closure will be required until 05 February 2021. It is anticipated that the works will take the stated duration to complete depending upon weather conditions. Access will be maintained for residents and businesses where possible, although delays are likely due to the nature of the works. The Order will have a maximum duration of 18 months. For further information please contact Steve Wilshire at Wales & West Utilities Ltd on 01173 013359.

#### GYPSIES AND TRAVELLERS DEVELOPMENT PLAN DOCUMENT AND WILTSHIRE LOCAL PLAN REVIEW Planning and Compulsory Purchase Act 2004 (as amended) The Town and Country Planning (Local Planning) (England) Regulations 2012 Regulation 18

#### Notification of intention to prepare and consult on the content and scope of a Gypsies and Travellers Development Plan Document (DPD) and consultation to inform the Wiltshire Local Plan Review

##### Gypsies and Travellers DPD

In accordance with Regulation 18 of the Town and Country Planning Regulations 2012, Wiltshire Council is consulting on its intention to prepare a Gypsies and Travellers DPD. The consultation was approved by Wiltshire Council's Cabinet on 13th October 2020. The purpose of this notification is to invite comments on the proposed scope and content of the Gypsies and Travellers DPD. Please note that the scope of the Wiltshire Local Plan Review has been amended to allow for the preparation of the Gypsies and Travellers DPD as a standalone plan.

The proposed scope of the Gypsies and Travellers DPD is to allocate land for travellers in sustainable locations meeting identified permanent and temporary accommodation needs up to 2036, in line with Government planning policy and legislation.

Due to the ongoing restrictions associated with the COVID-19 pandemic and to comply with:

- current Government Guidance (Planning Practice Guidance, Paragraph: 076 Reference ID: 61-076-201200513);
- the Council's Statement of Community Involvement (SCI); and
- Temporary Arrangements put in place alongside the SCI.

There will be no opportunity to view hard copies of the consultation documents at Council offices or libraries, nor will there be public consultation events.

The consultation document and supporting evidence (the Gypsy and Traveller Accommodation Assessment, Opinion Research Services, 2020) will be published on Wiltshire Council's Planning Policy website at: <https://www.wiltshire.gov.uk/planning-gypsy-travellers>. Alternatively if you do not have access to the internet and wish to receive a hard copy of the consultation documents and supporting evidence, please contact the Spatial Planning Service at [spatialplanningpolicy@wiltshire.gov.uk](mailto:spatialplanningpolicy@wiltshire.gov.uk) or 0300 456 0100.

Bespoke consultation will be carried out with traveller households due to the importance of the spoken word in traveller communities.

If you would like to comment on the proposed scope and content of the Gypsies and Travellers DPD, these should be submitted during the consultation period, running from **Wednesday 13 January to 11:59pm Tuesday 9 March 2021**. Representations received beyond this date may not be considered.

Representations can be emailed to: [spatialplanningpolicy@wiltshire.gov.uk](mailto:spatialplanningpolicy@wiltshire.gov.uk). Alternatively, please send your representations to: Spatial Planning, Economic Development and Planning, Wiltshire Council, County Hall, Trowbridge, BA14 8JQ.

Copies of all comments received will be made available for the public to view, including the name of the stakeholder who submitted the representation. Therefore, your response cannot be treated as confidential. However, the Council will not include any personal addresses or signatures.

Further detail in terms of the timetable for preparing the Gypsies and Travellers DPD is set out in the Council's latest Local Development Scheme July 2020. A copy of the Local Development Scheme can be provided on request using the contact details set out in this notice.

##### Consultation to inform the Wiltshire Local Plan Review

On Tuesday 1 December 2020 Wiltshire Council's Cabinet agreed the next steps for the Local Plan Review process, including undertaking a round of consultation to enable people to comment and help shape the content of the draft Wiltshire Local Plan Review, which is due for publication towards the end of 2021. This round of consultation builds on earlier engagement with councillors, council partners and the public undertaken since 2017.

The published consultation materials include: an emerging strategy for guiding where growth will be planned for in each of the County's main towns and city; a planning framework for managing development in rural areas; and the opportunity to provide feedback on how the Council's planning policies can be shaped to address climate change.

In addition, to the main consultation documents, the Council has prepared a number of supporting documents, as follows:

- Interim Sustainability Appraisal, Wiltshire Council
- Interim Sustainability Appraisal, Wiltshire Council - Annex I: SA of Alternative Development Strategies for Housing Market Areas (HMAs)
- Interim Sustainability Appraisal, Wiltshire Council - Annex II: SA of potential development sites (reasonable alternatives) at Chippenham, Salisbury and Trowbridge
- Formulating Alternative Development Strategies (ADSS) Wiltshire Council - Chippenham HMA
- Formulating Alternative Development Strategies (ADSS) Wiltshire Council - Salisbury HMA
- Formulating Alternative Development Strategies (ADSS) Wiltshire Council - Swindon HMA
- Formulating Alternative Development Strategies (ADSS) Wiltshire Council - Trowbridge HMA
- Habitats Regulations Assessment Screening Opinion, Land Use Consultants, 2020

- Strategic Flood Risk Assessment (SFRA) Level 1 Study, JBA Consulting, May 2019
- Autumn 2017 Regulation 18 consultation reports (9 reports in total)
- Autumn 2018 Regulation 18 consultation reports (2 reports in total)
- 2019 Regulation 18 consultation reports (5 reports in total)
- Local Transport Review, Atkins, 2020
- Town Centre and Retail Study, Avison Young, December 2020
- Swindon Borough Council & Wiltshire Council Local Housing Needs Assessment, Opinion Research Services, April 2019
- Wiltshire Employment Land Review, Final Report, May 2018
- Swindon and Wiltshire Functional Economic Market Area Assessment (FEMAA), Hardisty Jones Associates, December 2016

Comments on these supporting documents are invited within the consultation period.

Again, due to the ongoing restrictions associated with the COVID-19 pandemic and to comply with:

- current Government Guidance (Planning Practice Guidance, Paragraph: 076 Reference ID: 61-076-201200513);
- the Council's Statement of Community Involvement (SCI); and
- Temporary Arrangements put in place alongside the SCI.

There will be no opportunity to view hard copies of the consultation documents at Council offices or libraries.

The consultation documents and supporting documents will be published on Wiltshire Council's Planning Policy website at: <https://www.wiltshire.gov.uk/planning-policy-local-plan-review-consultation>

Alternatively if you do not have access to the internet and wish to receive a hard copy of the consultation documents and supporting documents, please contact the Spatial Planning Service at [spatialplanningpolicy@wiltshire.gov.uk](mailto:spatialplanningpolicy@wiltshire.gov.uk) or telephone on 0300 456 0100.

If you would like to comment on the content of the Local Plan Review materials, these should be submitted during the consultation period, running from **Wednesday 13 January to 11:59pm Tuesday 9 March 2021**. Representations received beyond this date may not be considered.

Representations should focus on the questions asked in the published documents. Representations can be submitted via email to: [spatialplanningpolicy@wiltshire.gov.uk](mailto:spatialplanningpolicy@wiltshire.gov.uk) using the Response Forms available on the Council's website. Alternatively, please send your representations to: Spatial Planning, Economic Development and Planning, Wiltshire Council, County Hall, Trowbridge, BA14 8JQ.

Copies of all comments received will be made available for the public to view, including the name of the stakeholder who submitted the representation. Therefore, your response cannot be treated as confidential. However, the Council will not include any personal addresses or signatures.

To support the consultation, the Council will be running a series of live events during January and early February 2021 via Microsoft Teams Live Events. Details of these events and how to register your interest to attend can be found at: <https://www.wiltshire.gov.uk/planning-policy-local-plan-review> Council or provided by contacting [spatialplanningpolicy@wiltshire.gov.uk](mailto:spatialplanningpolicy@wiltshire.gov.uk), or 0300 456 0100.

Further detail in terms of the timetable for preparing the Wiltshire Local Plan Review is set out in the Council's latest Local Development Scheme July 2020. A copy of the Local Development Scheme can be provided on request using the contact details set out in this notice.

Sam Fox  
Interim Corporate Director Place and Environment

#### Town and Country Planning (General Development Procedure) (England) Order 2015

#### Town and Country Planning (Listed Buildings and Conservation Areas (Amendment) (England) Regulations 2010

The following planning applications are those affecting the setting of a Listed Building, a Conservation Area, a Public Right of Way, or major applications and are available to view on our website. Views relating to the planning applications listed below should be made by **04/02/2021** quoting the reference number. All views expressed regarding a planning application will be considered and placed on a file, which is open to the public.

**ASHTON KEYNES - 20/11250/MODPO** Aggregate Industries UK Ltd, Cleveland Farm Works, Discharge of Planning Obligation relating to Section 106 agreement for N/89/2844; **BIDDESTONE - 20/10605/FUL** The Former Biddestone Arms, The Green, Farm 2 Houses, Erection of 4 Dwellings; **CALNE - 20/10137/FUL & 20/10954/LBC** Caine Free Church, Church Street, Rebuilding of wall/underpinning of buttresses to church hall/repair wall; **20/10573/FUL & 20/11630/LBC** St Marys School, Curzon Street, Erection of pavilion; **20/10611/LBC** 11 High Street, Removal of Signage/ATM; **CALNE WITHOUT - 20/10600/LBC** Lysley Arms, Pewsham, Internal/external alterations/refurbishments; **CASTLE COMBE - 20/10355/FUL** Park Lane Cottage, 2 Park Lane, Extension; **CHARLTON - 20/10311/LBC** 7 Charlton Park House, Charlton Park, Wood burning stove/flue liner; **CHERRILL - 20/10719/FUL & 21/00004/LBC** Tudor Thatch, The Street, Yatesbury, Timber mansard; **CHIPPENHAM - 20/10378/FUL** 53 The Causeway, Change of use of ground floor to residential; **DEVIZES 20/07136/LBC & 20/07137/ADV** 5 The Brittox, Barber pole/signage; **GRITTLETON - 20/09710/FUL & 20/11206/LBC** Holly Tree Cottage, Sevington, Extension/alterations; **20/10382/FUL & 20/11268/LBC** Woodlands, The Street, Summerhouse; **20/10607/FUL & 20/11380/LBC** Ryleys Farmhouse, Orangery extension/car port; **KINGTON LANGLEY - 20/09635/FUL & 20/11364/LBC** Sundial House, Swindon Road, Internal/external alterations; **MALMESBURY - 20/10587/LBC** Avon Cottage, 13 Back Hill, Alterations/install central heating/external landscaping; **MARLBOROUGH - 20/10118/LBC** Memorial Hall Forecourt, Marlborough College, Bath Road, Replacement pavers/Drainage works; **20/10733/FUL & 20/11656/LBC** 3A Herd Street, Extension/alterations; **NETTLETON - 20/10429/LBC** Green Cottage, Repair/Replacement of Chimney Stack; **ROYAL WOOTTON BASSETT - 20/11655/FUL** Land at Brynards Hill, Erection of 61 Dwellings; **SEEND - 20/10746/LBC** 1 & 2 Weavers Cottages, High Street, Replacement windows; **WEST LAVINGTON - 20/10526/FUL** Wyneshore House, 2 White Street, Formation of 1 bed apartment & carport/garage/workshop; Email: [developmentmanagement@wiltshire.gov.uk](mailto:developmentmanagement@wiltshire.gov.uk)

**Wiltshire Council**

## Appendix 8

Please see overleaf a copy of the press release issued 01/12/20: "*Cabinet agrees next steps for Wiltshire Local Plan review*". This press release was placed on the Wiltshire Council website, promoted on social media, and sent to a variety of sources including all Wiltshire Council members, Town & Parish councils along with local/regional and some national media.

# Cabinet agrees next steps for Wiltshire Local Plan review

Wiltshire Council's Cabinet has agreed the next steps for the Local Plan review, with consultation due to start in the new year.

Published 1 December 2020



Wiltshire Council's Cabinet has today (Tuesday 1 December) agreed the next steps for the Local Plan review, with consultation due to start in the new year.

The Local Plan will set out where future developments - such as housing and businesses - may be built within Wiltshire up to 2036, and will be used to guide decisions on whether future planning applications can be granted or not.

Cabinet agreed that the consultation on the Local Plan review can begin in the new year, when people's comments can help to shape the draft plan before any decision is made on where to allocate housing, employment and other infrastructure.

This consultation includes possible growth in each of the county's main towns and city, a planning framework for rural areas, and the opportunity to ask questions about how the council's planning policies can be shaped to address climate change. It builds on earlier consultations with councillors, council partners and the public.

Cllr Toby Sturgis, Cabinet Member for Planning, said: "The Local Plan review consultation will take place in early 2021, and is a chance for people to have their say on the possible areas of growth in Wiltshire, before proposals are finalised in the draft Local Plan, later next year.

"If land is identified in the consultation documents as possible options for development, this does not necessarily mean it will be taken forward. We would like to hear people's views on the suitability of these possible options before setting out any development allocations.

"We recognise the importance of planning for climate change, as we seek to make the county of Wiltshire carbon neutral, and this will also form a key part of the consultation.

"Restrictions due to COVID-19 mean that we're unable to hold face-to-face events, so we'll be holding some consultation events online. We'll have more details about these events, and how people can get involved, in the coming weeks.

"We recognise that communities will want to have a say about where any development may take place. However, although people can view the documents for the Local Plan review online, we won't be capturing any comments until the consultation period begins early next year, so people should wait until then to send us their comments."

For each main town and city in the county, the council will consult on the amount of additional new homes and land for employment development proposed up to 2036. People will be able to have their say on whether the changes to the rates of development growth are too high, or too low and what opportunities there are.

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[Explore the topic](#)

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## Appendix 9

Please see overleaf a copy of the press release issued 18/12/20: "*Sign up to online events and have your say about where future developments should take place in Wiltshire*". This press release was placed on the Wiltshire Council website, promoted on social media, and sent to a variety of sources including all Wiltshire Council members, Town & Parish councils along with local/regional and some national media.

[Home](#) > [News and communications](#)

# Sign up to online events and have your say about where future developments should take place in Wiltshire

Have your say on the Wiltshire Local Plan

Published 18 December 2020



Wiltshire communities, businesses, town and parish councils and other local stakeholders are invited to have their say on the possible sites that may be marked for growth in their area.

Wiltshire Council has to allocate sufficient land to satisfy housing and employment needs up to 2036, and is seeking the views of local communities and stakeholders to see if the suggested distribution of numbers across the county is correct, and which of the proposed sites are most suitable.

Feedback during this review consultation will help to shape the draft Local Plan, which will then be consulted on later in 2021. The Local Plan will be used to guide decisions on whether future planning applications for housing, infrastructure and land for employment can be granted.

The council will launch the consultation into its Wiltshire Local Plan review, and separately its Gypsy and Traveller Local Plan, from Wednesday 13 January 2021 until 11:59pm on Tuesday 9 March 2021.

As COVID restrictions mean that face-to-face events will not be possible during this review, the council is holding a series of online events for people to find out more about the Local Plan. Each event relates to a particular settlement, and there are also two events for rural areas, which include all other Wiltshire villages and settlements that are not covered in the other 15 events.

The online events, which will be held from 7pm-8pm on the dates shown are as follows:

Sign up for the online events [here](#), and you will be sent a link to your chosen online meeting in advance of the meeting. The consultation documents will be posted here before the consultation begins: [www.wiltshire.gov.uk/planning-policy-local-plan-review](http://www.wiltshire.gov.uk/planning-policy-local-plan-review).

Cllr Toby Sturgis, Cabinet Member for Planning, said: "The Wiltshire Local Plan review consultation is an important opportunity for people to have their say on the future of possible areas of growth in their area before proposals are finalised in the draft Local Plan, later in 2021.

"We would usually hold a series of face-to-face engagement events for the Local Plan review, but we are unable to do so at present because of the COVID-19 pandemic. Therefore, I would urge as many people as possible to sign up for their local online event to find out more.

"Anyone who can't make their local online event will be able to view all the relevant documents online and complete the online consultation to have their say.

"As well as potential developments, the Local Plan review consultation also takes into account the importance of climate change, and this will also form a key part of the consultation.

"If anyone has any queries, they can speak to one of our planning officers about the Local Plan review."

Once this consultation is complete, a draft Local Plan will be produced, and people will be given another opportunity to take part in a consultation in late 2021. The plan will then be submitted to the Secretary of State in the third quarter of 2022, before it is examined by an inspector in late 2022, ahead of final adoption in 2023.

During the same consultation period, from Wednesday 13 January until Tuesday 9 March, the council is also consulting on the Gypsy and Traveller Local Plan.

In line with Government planning policy and legislation, the plan will look to allocate land for travellers in sustainable locations to meet their permanent and temporary accommodation needs up until 2036.

This consultation will help to shape a draft plan, which the council will then consult on again in autumn 2021, before the plan is submitted to Government, ahead of public examination and then adoption of the plan in late 2022. To find out more about the Gypsy and Traveller Local Plan, people can go to [www.wiltshire.gov.uk/planning-gypsy-travellers](http://www.wiltshire.gov.uk/planning-gypsy-travellers).

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**Explore the topic**

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## Appendix 10

Please see overleaf a copy of the press release issued 08/01/21: “*Sign up for Wiltshire Local Plan Review online events*”. This press release was placed on the Wiltshire Council website, promoted on social media, and sent to a variety of sources including all Wiltshire Council members, Town & Parish councils along with local/regional and some national media.

# Sign up for Wiltshire Local Plan Review online events

Have your say on future developments in the county

Published 8 January 2021



Wiltshire residents, businesses and town and parish councils are being urged to sign up for online events to have their say on where future developments such as housing, infrastructure and land for employment, should be built, and how Wiltshire Council looks to tackle climate change through planning.

The online engagement sessions are being held instead of face-to-face meetings because of COVID restrictions. They form part of the latest consultation into the Wiltshire Local Plan review, and offer a chance for people to find out more about the plans in their area, before submitting comments. The online consultation begins on Wednesday 13 January 2021 until 11:59pm on Tuesday 9 March 2021.

CLr Toby Sturgis, Cabinet Member for Planning, said: "The Wiltshire Local Plan review consultation is the perfect opportunity for people to have their say on sites in Wiltshire that may be considered for development.

"There will be a further opportunity for people to have their say on the draft Local Plan later this year, but it's really important that people let us know what they think now, as once the Plan is finalised and adopted in 2023, it may be too late to shape where developments may go within Wiltshire.

"I would urge as many people as possible to sign up for their local online event to find out more about the Local Plan review and how to have a say. Anyone who can't make their local online event will be able to view all the relevant documents online and submit their views. Measures will also be in place for those without internet access."

Each event relates to a particular settlement, and there are also two events for rural areas, which include all other Wiltshire villages and settlements that are not covered in the other 15 events. The online events will be held from 7pm-8pm on the dates shown:

- Planning for Calne, Monday 18 January
- Planning for Corsham, Tuesday 19 January
- Planning for Royal Wootton Bassett, Tuesday 19 January
- Planning for Chippenham, Wednesday 20 January
- Planning for Tidworth and Ludgershall, Wednesday 20 January
- Planning for Malmesbury, Thursday 21 January
- Planning for Amesbury, Thursday 21 January
- Planning for Marlborough, Monday 25 January
- Planning for Bradford on Avon, Monday 25 January
- Planning for Westbury, Tuesday 26 January
- Planning for Salisbury, Tuesday 26 January
- Planning for Devizes, Wednesday 27 January
- Planning for Trowbridge, Wednesday 27 January
- Planning for Melksham, Thursday 28 January
- Planning for Warminster, Thursday 28 January
- Planning for rural areas, Monday 1 February and Tuesday 2 February

Sign up for an event and to find out more, including supporting documents, see: [Local Plan Review](#). People without access to the internet can call 0300 456 0100 to request physical copies of documents. After signing up, people will be sent a link to their chosen online meeting in advance of the meeting.

[Explore the topic](#)

## Appendix 11

Please see overleaf a copy of the press release issued 13/01/21: "*Consultation into the Wiltshire Local Plan begins today*". This press release was placed on the Wiltshire Council website, promoted on social media, and sent to a variety of sources including all Wiltshire Council members, Town & Parish councils along with local/regional and some national media.

# Consultation into the Wiltshire Local Plan begins today

People throughout Wiltshire can now have their say on the Local Plan review, and the Gypsy and Travellers Plan, as the consultations begin today.

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Published 13 January 2021

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People throughout Wiltshire can now have their say on the Local Plan review, and the Gypsy and Travellers Plan, as the consultations begin today.

The Local Plan consultation is the perfect opportunity for residents, business and other Wiltshire stakeholders, such as town and parish councils, to share their views on where future development - including housing, infrastructure and land for employment - may be built in their area for the next 15 years.

Wiltshire Council has to allocate sufficient land to satisfy the county's housing and employment needs up to 2036, and in this consultation, people will be able to give their feedback on whether the suggested distribution of housing numbers across the county is correct, and which of the proposed development sites are most suitable. It is also looking to develop its planning policies to help tackle climate change.

Cllr Toby Sturgis, Cabinet Member for Planning, said: "The Local Plan sets out where development, such as housing, may be built in Wiltshire up until 2036, so it's important that people use this opportunity to take part in the consultation and let us know what they think.

"Although there will be another chance to comment on the draft Local Plan later in the year, this is a key stage in the plan-making process, as it gives communities and businesses the opportunity to let us know what they think about proposed development in their area before the Plan is finalised for consultation and examination. We also want people's thoughts on how we can tackle climate change through planning.

"I'd encourage anyone with an interest in development in their community, whether it's a town or village, to take part in this consultation process, sign up for our online engagement events to find out more, and then submit their comments."

The council is also holding a series of online engagement sessions to enable people to find out more about the proposals their area. There are 17 events; 15 that each relate to a particular settlement, and two events for rural areas, which include all other Wiltshire villages and settlements that are not covered in the other 15 events.

Find out more about the Local Plan review, view documents, have your say, and sign up for one of the online engagement sessions here: [Local Plan Review](#).

In addition, the council is also consulting on the proposed scope and content of the Gypsies and Travellers Plan, which will look to allocate land for travellers in sustainable locations to meet their permanent and temporary accommodation needs up until 2036. Find out more about the [Gypsies and Travellers plan](#).

Both consultations end on Tuesday 9 March 2021.

## Appendix 12

Please see overleaf a copy of the press release issued 10/02/21: *“More than 1,300 people attend Local Plan review engagement sessions as consultation continues”*. This press release was placed on the Wiltshire Council website, promoted on social media, and sent to a variety of sources including all Wiltshire Council members, Town & Parish councils along with local/regional and some national media.

## More than 1,300 people attend Local Plan review engagement sessions as consultation continues

The last of Wiltshire Council's online engagement sessions to explain more about the ongoing Local Plan review consultation has ended, with 1,321 people joining the events.

Published 10 February 2021



The sessions were an opportunity for people to find out more about the proposals in their local area, and to ask questions about the plans and the consultation. In total, the council held 17 events, 15 related to towns and the city in the county, and two on plans for rural areas.

Although the online engagement events have now finished, people can still view the presentations from the events, view all the consultation documents, and have their say on the consultation, which ends on 9 March. All the information, including how to submit comments, is available at: [www.wiltshire.gov.uk/planning-policy-local-plan-review-consultation](http://www.wiltshire.gov.uk/planning-policy-local-plan-review-consultation).

Anyone without internet access can call the council on 0300 456 0100 to speak to the Spatial Planning team to find out more about the plan or to request printed copies of documents. People can also make submissions to the consultation by post.

CLlr Toby Sturgis, Cabinet Member for Planning, said: "As COVID restrictions mean that we couldn't hold face to face engagement events, this was the first time we have tried these online engagement sessions for a large scale consultation, and they have been a real success.

"The number of attendees to these online sessions has exceeded the numbers we would usually get at similar face to face events, and as people are able to ask questions anonymously online, we have had much greater open engagement.

"The people who attended the sessions made some very interesting and valuable points about the Local Plan, and all questions from the events will be answered and published on our website in the next two weeks, in plenty of time before the end of the consultation.

"The consultation is open until 9 March, and we want to hear from as many people in the county as possible, so please do take some time out to have your say. Feedback we receive at this stage will help to shape the next 15 years of development in Wiltshire, so it is really important that people let us know what they think."

This consultation is taking place alongside one on the Gypsies and Travellers Plan, which will look to allocate land for travellers in sustainable locations to meet their permanent and temporary accommodation needs up until 2036. To find out more about the Gypsies and Travellers Plan consultation, which also closes on 9 March, and to have their say, people should go to [www.wiltshire.gov.uk/planning-gypsy-travellers](http://www.wiltshire.gov.uk/planning-gypsy-travellers).

## Appendix 13

Please see overleaf a copy of the press release issued 02/02/21: *“There is still time to take part in the Wiltshire Local Plan review consultation”*. This press release was placed on the Wiltshire Council website, promoted on social media, and sent to a variety of sources including all Wiltshire Council members, Town & Parish councils along with local/regional and some national media.

# There is still time to take part in the Wiltshire Local Plan review consultation

There are now less than two weeks to take part in the Wiltshire Local Plan review consultation, and for people to have their say on where future developments may be built in the county in the next 15 years.

Published 26 February 2021

## Business and economy

The consultation closes on Tuesday 9 March, and although there will be a further consultation later in the year, people should take this opportunity to have their say about the future of housing, infrastructure and land for employment in their area.

Cllr Toby Sturgis, Cabinet Member for Planning, said: "We have had an excellent response to the consultation so far, with more than 500 submissions, but with less than two weeks to go until the closing date, we're asking anyone that hasn't already responded to do so by 9 March.

"All the Local Plan documents and an online form for people to have their say are on our website, and anyone without internet access who wants to have their say can contact our Spatial Planning team to discuss the plan in their area and submit their comments.

"People can call 0300 456 0100 to speak to one of our officers, and if they don't have access to the internet, they can also request printed copies of the documents and can write to us to submit their comments.

"It's really important that people take this opportunity to let us know what they think, as feedback we receive will help to shape the next 15 years of development in Wiltshire."

All the information on the Local Plan, including all documents, write ups of the engagement events, and how to submit comments, is available at [Local Plan Review consultation](#).

Written submissions can be sent to: Local Plan review consultation, Spatial Planning, County Hall, Bythesea Road, Trowbridge BA14 8JN.

This consultation is taking place alongside the Gypsies and Travellers Plan, which will look to allocate land for travellers in sustainable locations to meet their permanent and temporary accommodation needs up until 2036.

To find out more about the Gypsies and Travellers Plan consultation, which also closes on 9 March, and to have their say, people should go to [Gypsy and Travellers - planning](#).

## Appendix 14:

Initial summary of main issues raised through consultation on Wiltshire Local Plan Review as presented to Cabinet on 29 June 2021\*.

\*Within this appendix, where amendments have been made following feedback on the information published for factual accuracy, changes are shown as follows:

- text in **italicised bold and underlined** identifies text added
- text in **italicised bold and underlined struck-through** identifies text deleted.

## APPENDIX 1:

### Initial summary of main issues raised through consultation on Wiltshire Local Plan Review

#### 1. Introduction

1.1 Consultation to inform the Wiltshire Local Plan closed on 9 March 2021. Overall, in excess of 3,500 representations from 2,682 people and organisations were submitted on the consultation documents. A breakdown of the number of representations is provided in this report below against each consultation document. This summary outlines an initial analysis of the main issues that have emerged from the following consultation documents:

- Emerging spatial strategy
- Empowering rural communities
- Addressing climate change and biodiversity net environmental gain
- Planning for the Principal Settlements (Chippenham, Salisbury and Trowbridge)
- Planning for the Market Towns (12 in total)

1.2 A tabular format is used for each document and the consultation documents can be viewed via this [link](#).

#### 2. Emerging Spatial Strategy (372 comments, 324 respondents)

2.1 The scale of housing was the dominant subject of comments. Most representations were from the 'general public and town or parish councils' and 'developers and agents'. This analysis therefore focuses on these sources as they tend to represent the extreme differences in views and breaks them down into the main areas commented on.

Amount of housing	
General public and Town and Parish Councils	<ul style="list-style-type: none"><li>• The environmental impacts of this number of new homes are too great (both for lower and higher estimates of housing need for the plan period 2016 to 2036).</li><li>• Infrastructure is insufficient to support it (both for lower and higher estimates of housing need).</li><li>• Should not exceed the standard method requirement (a higher number will result in difficulties sustaining a five-year supply).</li><li>• Job growth does not support a higher amount than the standard method calculation.</li><li>• The amount of housing is being justified to deliver development at Chippenham.</li><li>• Evidence underpinning housing numbers is out of date due to COVID and impact on economy (housing need is less than estimated).</li></ul>

Developer/agent	<ul style="list-style-type: none"> <li>• A higher number than the standard method is supported; with many supporting the higher end of the range or above.</li> <li>• It should be higher: <ul style="list-style-type: none"> <li>- To boost supply over the assessed need of the Wiltshire Core Strategy (44,000)</li> <li>- By a longer plan period (see below)</li> <li>- To deliver more affordable homes</li> <li>- To reflect recent high levels of delivery (Housing Delivery Test)</li> <li>- To both respond to and support economic recovery</li> <li>- To marry up with the maximum forecasts of five or ten-year migration trends in housing market areas where they differ</li> </ul> </li> </ul>
<b>Climate change</b>	
General public and Town and Parish Councils	<ul style="list-style-type: none"> <li>• The strategy does not do enough to address climate change.</li> <li>• It represents business as usual - greenfield and car based. There should be carbon accounting and measurable targets set by the plan.</li> <li>• Lack of employment allocation at Melksham would exacerbate out-commuting and increase carbon footprint.</li> </ul>
Developer/agent	<ul style="list-style-type: none"> <li>• The strategy should focus growth on “sustainable settlements”, with general support for the main settlements.</li> <li>• Should extend “sustainable settlements” to include local service centres and large villages - both generally and certain settlements named e.g. those well related Swindon and Salisbury (see transport).</li> </ul>
<b>Transport</b>	
General public and Town and Parish Councils	<ul style="list-style-type: none"> <li>• Main settlements are already congested, and additional growth cannot be supported.</li> <li>• Greater emphasis upon accessibility by active modes of travel and brownfield development.</li> </ul>
Developer/agent	<ul style="list-style-type: none"> <li>• A focus on sustainable settlements can reduce the need to travel and support more sustainable modes.</li> <li>• Settlements near Salisbury (Laverstock and Wilton) and Swindon (Purton and Cricklade) are well located to support more environmentally friendly transport links.</li> </ul>
<b>Distribution of growth</b>	
General public and Town and Parish Councils	<ul style="list-style-type: none"> <li>• Too much emphasis upon greenfield sites and brownfield sites should be prioritised.</li> <li>• The COVID-19 pandemic will change behaviour and release land for new homes (e.g. in town centres).</li> <li>• The decline of town centres should be reversed.</li> <li>• Trowbridge Town Council considers that growth at Trowbridge should be dispersed around the town (village locations and Green Belt review).</li> </ul>

	<ul style="list-style-type: none"> <li>Concerns that inability to meet growth in Trowbridge Housing Market Area (HMA) will impact on locations in Melksham Community Areas in adjoining HMA.</li> </ul>
Developer/agent	<ul style="list-style-type: none"> <li>There is too great a focus on large sites at Chippenham, Trowbridge and (to a lesser degree) Melksham to be sure housing needs can be met in a timely way.</li> <li>(Consequently) higher scales of growth are necessary at other market towns.</li> <li>There is too much of a focus on main settlements when rural settlements can play a greater role than solely meeting local need.</li> <li>Opportunities to extend Swindon west have not been properly considered.</li> <li>There is too much emphasis upon brownfield land.</li> <li>Cotswold Business Park / Kemble Airfield promoted as new community for 2,000 homes (of which a significant part is in Cotswold District Council).</li> </ul>
<b>Economy</b>	
General public and Town and Parish Councils	<ul style="list-style-type: none"> <li>Growth should provide more employment to balance jobs and homes and reduce commuting.</li> <li>Becoming carbon neutral and changing behaviour as a result of the COVID-19 pandemic will affect employment needs.</li> </ul>
Developer/agent	<ul style="list-style-type: none"> <li>The economic evidence is out of date and needs to be revisited.</li> <li>Further evidence is needed on sectoral requirements.</li> <li>Junctions 16 and 17, M4 are promoted for strategic employment use.</li> </ul>
<b>Plan period</b>	
Developer/agent	<ul style="list-style-type: none"> <li>The end date of the plan should be altered so that it plans at least 15 years ahead at the time of adoption (2038 to 2040).</li> <li>The plan baseline should be brought up to date so that it plans positively for the future (2020 or 2021).</li> </ul>
<b>Neighbourhood planning</b>	
General public and Town and Parish Councils	<ul style="list-style-type: none"> <li>Confusion about neighbourhood plan requirements for towns, and the relationship between the Local Plan and neighbourhood plans.</li> <li>Confusion regarding purpose of brownfield targets and how these relate to the overall requirement for main settlements.</li> </ul>
Developer/agent	<ul style="list-style-type: none"> <li>The strategy should not rely on a large proportion of the homes needed being brought forward by neighbourhood planning.</li> <li>The relationship between neighbourhood plans and the Local Plan needs to be clarified.</li> </ul>

### 3. Empowering Rural Communities (337 comments, 158 respondents)

3.1 Over half of the comments received were from the general public, with approximately 20% from landowners, developers or their agents and just under 20% from Parish and Town Councils. The main topic of interest was the proposed housing requirements for Local Service Centres and Large Villages. The summary of responses below has been arranged around the proposed changes to strategic planning policy for rural areas, as set out in the consultation document.

#### **Suggestion for 40% affordable housing on sites of 5 or more dwellings**

40% Target:

- Many were supportive, with some asking that it be a minimum and others that it should be higher. A 50% target was suggested for Areas of Outstanding Natural Beauty.
- Some felt that it should be less than 40%; with one suggesting baseline target of 20%, with parish and town councils given scope to set higher targets in neighbourhood plans.
- Some highlighted national guidance that allows different targets to be set for different types/locations of sites.
- Others noted that the 40% target will need to be viability tested before it can be justified.
- Some expressed concerns that 'wherever possible' encouraged negotiation of lower provision, whereas others called for greater flexibility to reflect actual need at point in time.
- It was also suggested that a 40% target would compromise quality and mean greater proportion of larger homes for house builders to meet profit expectations.

The 5 dwelling threshold:

- Concerns that a 5 dwelling threshold would encourage developers to breakup larger sites.
- A 5 dwelling threshold is inconsistent with national policy and presupposes that applications for Designated Rural Status would be successful.
- A 5 dwelling threshold would impact on site viability in rural areas.
- Lower threshold of 2 dwellings was suggested in AONBs.
- Some support; thresholds higher than 5 (such as 10) would mean reduced affordable homes in rural area.

#### **Revised Core Policy 44 - community led housing in rural areas**

- General agreement and support for the proposed policy. However, concerns also raised.
- Some considered maximum homes on sites should remain as 10; others suggested 20 homes on some sites would be unviable - increase to a maximum of 30 dwellings, being no larger than 5% of the existing village size.
- Housing needs assessments to cover both affordable and market housing.

- 'Community support', 'genuine local need', 'community led' and 'affordable' should be clearly defined
- Inclusion of Community Led Homes (CLH) is supported; should reflect that can be provided by groups other than Community Land Trusts e.g. co-operatives
- 25% market homes cross-subsidy not justified.
- Concerns that allowing cross-subsidy of up to 50% market homes on CLH sites is too high, although some also felt that it should apply to all schemes.
- Self-build homes can't be retained as affordable in perpetuity.
- An additional exceptions policy is needed to support both affordable and market custom/self-build housing.
- Appropriate housing density should be one of the policy criteria.
- Provision should be made for down-sizing/retirement homes.
- Doesn't reflect proper use of brownfield sites.

**Restricting permitted development rights to prevent small homes in rural areas being increased in size or replaced by larger homes**

- Views were mixed. Whilst some were broadly supportive, many others were against.
- Wrong to restrict/withdraw permitted development rights. People extend to accommodate growing families due to restricted supply of larger houses and because moving is unaffordable.
- Would be justified if best way of maintaining good mix essential for vitality of village.
- 'Small' needs to be defined.
- Rural areas are already at disadvantage (poorer transport, more expensive internet, lower speeds, etc). Removing rights compared to those in urban areas is inequitable.
- Extending homes encourages redevelopment of buildings in need of repair. The proposed approach would prevent this.
- National policy encourages need for mix of housing to support local needs and the vitality of rural communities.
- Approach appears at odds with national planning policy, which is clear that policies should be positive and support sustainable development in rural areas.
- National guidance confirms permitted development rights should only be removed in exceptional circumstances. Government is clear that people should be able to alter and extend their own homes, which has led to a significant expansion of permitted development rights reflective of this presumption to support homeowners.
- There is no evidence to justify the approach proposed. Permitted development rights are enshrined in law and a compelling case is needed to withdraw them.
- Should only be applied to new and existing affordable homes regardless of size.
- Need for restrictions should be informed by housing needs assessments; and an understanding of number of households wishing to downsize and composition of the existing housing stock.

**Housing figures for Local Service Centres and Large Villages**

Method for calculating housing requirements:

- Figures do not seem to be based on clear evidence. Detailed methodology with stage-by-stage results should be published.
- Method should include factors such as:

- safety and capacity of the highway network
- access to public transport
- school capacity
- shop/ post office provision
- access to health services
- employment opportunities
- Grade 1 and Grade 2 agricultural land
- availability of sites for development
- proximity to services and facilities in nearby settlements
- how development can contribute to vibrancy of village and support services and facilities

- Method should be simpler, based on percentage increase of the existing population.
- Overall housing requirements allocated to Large Villages and Local Service Centres for each of the HMAs is too high.
- Figure for some places is too high e.g. Shaw/Whitley and Atworth
- Growth should be directed to areas where it will serve to enhance the vitality of communities across the area to support both housing and economic growth.
- Methodology is prejudicial against smaller Large Villages (LVs), imposing disproportionate level of housing upon them – proposed housing requirements for many of the smallest Large Villages is greater proportionately than for some of the Local Service Centres.
- Commitments that match or exceed requirements imposes moratorium on further growth to 2036 at those settlements.

#### **Policy for housing delivery and settlement status**

- Local Plan should allocate sites at Local Service Centres and Large Villages and not wait for Neighbourhood Plans or until the site allocations plan is reviewed.
- Should be time limits for how long Neighbourhood Plans will be given to allocate housing sites to meet their requirements.
- High residual housing requirements leave villages wide open for speculative development.
- Housing requirements should be for designated neighbourhood areas rather than settlements.
- Position of settlements in hierarchy should be reviewed to consider changes since they were first identified.
- Winterslow, Redlynch and Morgan's Vale should be reclassified as Small Villages.
- Purton and Lyneham should be reclassified as Local Service Centres.
- Durrington's population is significantly higher than other Large Villages - should at least be a Local Service Centre. No justification for changing status of settlement from Market Town.
- Shaw and Whitley should not be treated as a single Large Village, housing requirement is disproportionate.

#### 4. Addressing climate change and biodiversity net gain (163 comments, 158 respondents)

4.1 Comments generally fell into two groups. The first, those with environmental interests including general public and some parish councils who felt the Plan should be more aspirational in terms of achieving net zero carbon. The second, the more cautious development industry who pushed back questioning cost of building to zero carbon standards and the need for justification. Little evidence was provided through comments to help develop policy themes explored through the consultation. A summary of comments against the five policy themes is set out below.

<b>Tackling flood risk and promoting sustainable water management</b>
<ul style="list-style-type: none"><li>• Flood risk from all sources should be reduced through an evidence-led assessment process.</li><li>• Proposals for new development:<ul style="list-style-type: none"><li>- must be safe from flood risk from all sources, including the cumulative effects of flood risk.</li><li>- should incorporate multifunctional Sustainable Drainage Systems (wherever practicable) alongside natural flood management measures and nature-based solutions.</li><li>- should include measures to significantly reduce water consumption (e.g. using a standard of 110ltr/day).</li></ul></li><li>• Policies must be set for protection of water resources (e.g. Source Protection Zones).</li></ul>
<b>Enhancing green/blue infrastructure and biodiversity</b>
<ul style="list-style-type: none"><li>• Proposals for new development to be designed with sufficient, accessible and interconnected open spaces.</li><li>• Trees form an integral element of design of new developments.</li><li>• Strategy for protecting and enhancing green/blue infrastructure should be linked to expanding the network of active travel routes (wherever practicable).</li><li>• Proposals for new development should deliver biodiversity net-gains through comprehensive enhancement of existing habitats.</li></ul>
<b>Delivering sustainable design and construction methods in the built environment</b>
<ul style="list-style-type: none"><li>• Proposals for new development should utilise design features - such as choice of fabric, plot orientation, appropriate massing/density and natural features - to adapt to and wherever practicable mitigate for the effects of climate change.</li><li>• All new residential and commercial developments should be built to zero carbon standards for energy efficiency.</li><li>• Some felt that proposals for delivering zero carbon standard developments can be achieved with limited or no impact on scheme viability; but developers questioned the ability to do so.</li></ul>
<b>Encouraging sustainable renewable energy generation and management</b>

- Proposals for new development should have the ability to link to the national grid with limited or no impact on scheme viability.
- Proposals for new development should reduce energy demand and consumption.
- Opportunities for small-scale and large-scale renewable energy schemes should be encouraged and where necessary planned for through allocations of land.
- Wiltshire Council should lead by example in the installation and delivery of renewable energy from all practicable sources.
- Council's 'policy' of not supporting large-scale wind energy schemes should be reversed.
- Greater capture of wind and solar energy should be planned for, subject to the satisfactory mitigation of environmental impacts.
- Greater encouragement and support for the installation of community renewable energy schemes.

#### **Promoting sustainable transport, active travel and improving air quality**

- Opportunities for incorporating new Electric Vehicle (EV) charging points and hydrogen fuel refilling facilities should be fully explored and adopted.
- Proposals for new development should be in accessible locations to maximise opportunities for active travel.
- Opportunities for sustainable public transport schemes should be incorporated into major development schemes to encourage modal shift.
- All new development proposals should be adaptable and provide storage areas for bicycles and clothes drying facilities.
- Changes to working arrangements due to the pandemic should be factored into the design of new residential and commercial buildings.
- 

## **5. Principal Settlements: Chippenham, Trowbridge and Salisbury**

- 5.1 In response to the proposals for the three Principal Settlements there were significant representations relating to 'strategic matters' (e.g. the proposed scale, distribution and location of growth, lack of infrastructure, track record of delivery failure on large greenfield allocations, particularly at Trowbridge) and 'site specific' matters (e.g. traffic/congestion, environmental impact, loss of open space, disregard for the character of nearby villages).

### **Planning for Chippenham (473 comments, 375 respondents)**

#### **Summary**

There were significant objections in response to the proposals, the scale of housing growth receiving the most comments, alongside objections to the preferred sites. Other specific issues raised by a significant number of respondents, include the need to prioritise brownfield over greenfield land, impacts on transport, landscape and biodiversity, and importance of green infrastructure and addressing climate change. Alternative greenfield sites were suggested including to the west of the A350 and an extension to Rawlings

Green allocation. Strategic employment allocations are promoted to the north and south of Junction 17, M4.	
<b>Scale of Growth</b>	
General public and Town and Parish Councils	<ul style="list-style-type: none"> <li>• Significant objections to proposed level of growth - too high. Comments include how Chippenham is becoming too large and lacks infrastructure; housing numbers beyond Chippenham's needs.</li> <li>• Lead to out-commuting, increasing traffic and effect environment (air and noise pollution.)</li> <li>• Impacts on greenspace and cycleways.</li> <li>• Requests to prioritise redevelopment of brownfield land, higher brownfield land figure, reuse vacant buildings in the town centre and other empty buildings for residential use.</li> <li>• Requests for housing to be distributed to other towns and villages.</li> <li>• Climate change and loss of greenfield land is a concern; retain for farms and food production.</li> <li>• HIF bid pre-determined scale of growth.</li> <li>• Not enough evidence for housing figure.</li> </ul>
Developer/agent	<ul style="list-style-type: none"> <li>• Support for Chippenham as focus for growth.</li> <li>• Although questions about deliverability of high number of dwellings in plan period, as well as existing allocations.</li> <li>• Mixed support for brownfield target.</li> </ul>
Other	<ul style="list-style-type: none"> <li>• Prioritisation of brownfield land supported but must be designed sensitively to historic environment.</li> <li>• No robust case for level of growth. Not deliverable.</li> <li>• Excessive loss of countryside and resultant impact; contradicts climate emergency declaration.</li> <li>• Brownfield target implies loss of substantial employment land/space, undermining jobs and homes balance - increasing out commuting (carbon use) and congestion.</li> <li>• Support homes as positive for economic future of town</li> </ul>
<b>Place shaping Priorities</b>	
General Public and Town and Parish Councils	<ul style="list-style-type: none"> <li>• Consider impact of COVID-19 on the town centre and new uses for vacant buildings, including residential uses to strengthen centre; suggestion no need for new employment land.</li> <li>• Disagree that new road is required.</li> <li>• Should emphasise importance of River Avon, other green corridors and separation from surrounding villages (e.g. Tytherton Lucas, Stanley). Concerns about coalescence.</li> <li>• Priorities designed to support new sites, rather than lack of leisure and retail in Chippenham or adverse effects of development on Bremhill Parish.</li> </ul>

	<ul style="list-style-type: none"> <li>• Protect: Marden River similar to River Avon; North Rivers Cycle route as important corridor for walkers and cyclists. A road to the East of Chippenham will not ease congestion. Prefer the road to the south of Chippenham.</li> <li>• General support by Chippenham Town Council, as match Neighbourhood Plan Vision - minor amendments for priorities 1 (employment), 2 (town Centre) and 5 (Transport).</li> </ul>
Developer/agent	<ul style="list-style-type: none"> <li>• Developers comments on the place shaping priorities generally relate to their use in justifying preferred sites.</li> <li>• Owners of Borough Parade and Emery Gate Shopping Centres seeking to change existing shops to residential.</li> </ul>
Others	<ul style="list-style-type: none"> <li>• Priorities could reflect positive strategy for conservation and enjoyment of the historic environment.</li> <li>• Sport England suggests the creation of a healthy, inclusive sustainable town can be achieved through use of their 'Active Design' guidance.</li> <li>• Priorities are business as usual references to sustainable development, air quality and congestion, town centre investment. Won't create homes or jobs for local people.</li> <li>• Priority 5 is disingenuous due to focus on traffic congestion, which facilitates homes to south of Chippenham.</li> <li>• National Trust objects to southward expansion of Chippenham due to impacts on wider landscape setting of Lacock village and its historic assets.</li> </ul>
<b>Preferred Sites</b>	
General public and Town and Parish Councils	<ul style="list-style-type: none"> <li>• Significant objections to preferred sites. Some support for other options instead, particularly west of A350.</li> <li>• Significant objection to Future Chippenham and HIF proposals - done deal without consultation.</li> <li>• Retain farms and use for local food production.</li> <li>• Petition from 65 Hardens Mead residents seeking some fields to be designated as local greenspace (Site 1, East Chippenham).</li> <li>• Much of Site 1 (East Chippenham) is in Bremhill Parish and not supported by Bremhill Parish Neighbourhood Plan.</li> <li>• Town Council objects to preferred sites: <ul style="list-style-type: none"> <li>- severe adverse impact on town, unacceptable damage to local environment - destruction high-quality farmland and wildlife habitat in Avon and Marden Valley.</li> <li>- New road including 2 river crossings and railway bridge not required without excessive housing numbers.</li> <li>- Sustainability Appraisal site criteria is biased; site selection methodology used to dismiss other options, which would not require costly carbon intensive infrastructure.</li> </ul> </li> </ul>

	<ul style="list-style-type: none"> <li>- No brownfield or town centre sites included as options despite opportunity to improve town character and vibrancy.</li> <li>- Selected for commercial reasons (Wiltshire Council owned land), to coincide with road route and support business case for a new road.</li> </ul>
Developer/agent	<ul style="list-style-type: none"> <li>• Developers of land within preferred sites generally supportive; but raise objections on specific points, particularly place shaping priorities and concept plan layouts.</li> <li>• All developers seeking to maximise residential use on their land; less supportive of providing other uses e.g. employment, schools, renewable energy, greenspace.</li> <li>• More housing can be accommodated north of the North Rivers Cycle Route (New Leaze Farm); this has closer links with town centre than other parts of the site.</li> <li>• Promotion of some parts of sites as standalone developments.</li> <li>• Employment land locations would be better located nearer to A4 and/or A350; seeking advice from Local Enterprise Partnership.</li> <li>• Developers for other options consider their sites should be preferred as they do not involve major infrastructure and capable of early delivery - they challenge sustainability appraisal, site methodology including place shaping priorities.</li> <li>• Allocation of Langley Park as a brownfield site is promoted.</li> <li>• Promotion of additional land at existing Rawlings Green allocation to provide more housing and country park.</li> <li>• Promotion of extension to employment site south of M4 Junction 17 and new strategic allocation of land north M4 Junction 17 for employment.</li> </ul>
Others	<ul style="list-style-type: none"> <li>• Greater clarity needed on how impact on historic environment has informed spatial strategy and site selection considering legislation and national policy.</li> <li>• Some support that sites are the most appropriate.</li> <li>• Proposed economic development helps redress out-commuting and support town centre.</li> <li>• Lack of progress on Rawlings Green will impact on delivery of east Chippenham site. Alternative mix of sites based on lower quantum suggested that benefits from credible public transport.</li> <li>• Recommendation for the completion of hospital link road instead of the southern link road.</li> <li>• County farms should be used for local food.</li> <li>• Objections to all proposed sites. New economic evidence is needed to consider impact of COVID-19 and inform balance of jobs to homes - question need for employment land; retail and offices should be converted into homes.</li> <li>• Support for more homes north of cycle route due to accessibility to town centre and railway.</li> </ul>

<b>Concept Plans</b>	
General Public and Town and Parish Councils	<p>Detailed comments from Chippenham Town Council:</p> <ul style="list-style-type: none"> <li>• Detail of sites should be left to neighbourhood plan; albeit broad support for land uses.</li> <li>• Infrastructure, renewable energy, green buffer, local green spaces, walking and cycling routes, sustainable building construction and biodiversity net gain most important aspects.</li> <li>• Concerns about impact on villages.</li> <li>• Walking/cycling to link with existing network, urban area, town centre and transport modes.</li> <li>• More employment land to reduce car use.</li> <li>• More land for renewable energy.</li> <li>• Objects to built-up areas either side of cycle route, should be a green corridor as in emerging neighbourhood plan; housing to north contrary to Bremhill neighbourhood plan.</li> <li>• Uses for Hardens and New Lease Farms should be agricultural.</li> </ul>
Others	<ul style="list-style-type: none"> <li>• Consider Agricultural Land Classification for East Chippenham - site includes soil graded as best and most versatile.</li> <li>• Sewage treatment works in south Chippenham option may need to be expanded, as such residential development would need to be at appropriate distance.</li> <li>• Significant infrastructure, such as bridges, will cross the floodplain and the main river - development of infrastructure must not increase flood risk, and be delivering flood risk betterment for community and new development.</li> <li>• Opportunity to provide a longer length of River Park through the town and beyond should be looked at, including options to replace radial gate, for benefit of biodiversity, amenity and flood risk.</li> <li>• Proposals should demonstrate how responded to the historic environment including historic and landscape setting of the town, as well as historic assets.</li> <li>• Wilts and Berks Canal Trust considers that provision of canal should be integrated into site proposals and construction secured as green and blue corridor with walking/cycling routes.</li> <li>• Location is sought for an indoor community tennis facility at town.</li> </ul>

### **Planning for Salisbury (357 comments, 289 respondents)**

#### **Summary**

Significant concerns were expressed by the local community about effects of additional growth, both upon infrastructure and the city's historic landscape setting; and particularly the preferred site North of Downton Road between the city and Britford. Impact on ecology of the East Harnham Meadows SSSI being a key concern as well as coalescence. Fewer

<p>objections were expressed about the other two preferred sites, but concerns were raised about impact on historic environment. Considerable support was expressed for brownfield development first from the community with some wishing to see Churchfields brought forward for housing led development. Conversely, the development sector highlights that brownfield is uncertain and may not realise affordable housing that is needed. Alternative sites were promoted.</p>	
<p>General Public and City and Parish Councils</p>	<ul style="list-style-type: none"> <li>• Redevelopment of brownfield land should be prioritised, re-use vacant buildings in the centre and elsewhere for residential use; ahead of greenfield/reduce greenfield loss.</li> <li>• Objections mainly to consequences of growth i.e. lagging infrastructure delivery, impact on highways, air-quality, landscape and biodiversity.</li> <li>• More active travel modes needed.</li> <li>• Concerns about loss of greenfield land.</li> <li>• General support for redevelopment of Churchfields for residential rather than retain in employment use, due to concerns about traffic (congestion, air quality) as alternative to greenfield.</li> <li>• Improvement of amenities and facilities needed at Old Sarum.</li> </ul>
<p>Developer/agent</p>	<ul style="list-style-type: none"> <li>• Comments that housing number for Salisbury should be higher, particularly given demand.</li> <li>• Brownfield development is uncertain and will not deliver.</li> <li>• Salisbury needs affordable housing, more easily realised through greenfield development.</li> </ul>
<p><b>Place-shaping Priorities</b></p>	
<p>General public and City and Parish Councils</p>	<ul style="list-style-type: none"> <li>• Concerns that priorities on landscape setting of city and separation with outlying villages (particularly Britford) not properly reflected in preferred sites selected.</li> <li>• Place shaping priority about Central Area Framework and visitor economy should be expanded to incorporate other sectors.</li> <li>• Priority for affordable housing should include explicit reference to key worker, young people and elderly.</li> <li>• Churchfields should be prioritised for redevelopment as Wiltshire Core Strategy to avoid HGVs through city centre</li> <li>• Support for redeveloping Churchfields and reducing employment.</li> </ul>
<p><b>Preferred sites</b></p>	
<p>General public and City and Parish Councils</p>	<ul style="list-style-type: none"> <li>• Significant objections to preferred site North of Downton Road; concerns raised about coalescence of Salisbury with Britford, East Harnham Meadows SSSI, views to Cathedral, loss of landscape character and flooding.</li> <li>• Salisbury City consider site should be country park, particularly if North of Downton Road is allocated.</li> </ul>

	<ul style="list-style-type: none"> <li>• Britford parish suggest alternative site option should be considered in combination with preferred site North of Downton Road.</li> <li>• Reduce quantum of development proposed on preferred site North of Downton Road.</li> <li>• Relatively few objections to preferred site South of Downton Road.</li> <li>• Quidhampton Parish Council objects to Quidhampton Quarry (although not preferred site) becoming housing allocation.</li> <li>• Concerns about preferred site North East of Old Sarum due to impacts on landscape and Monarch's Way long distance path, and lack of facilities and amenities at Old Sarum.</li> </ul>
Developer/agent	<ul style="list-style-type: none"> <li>• Support from developers and landowners of preferred sites; promoter of preferred site South of Downton Road seeking its expansion to include Britford Park and Ride.</li> <li>• Developer associated with alternative option South of Harnham promoting its allocation.</li> <li>• New sites submitted and promoted adjacent to Beehive Park and Ride (Old Sarum), and south-west of Salisbury, adjacent to existing allocation on Netherhampton Road.</li> <li>• <b><u>A new site is also proposed at Ford Farm (NE Salisbury) for a mixed use zero carbon development with up to 600 houses.</u></b></li> </ul>
Others	<ul style="list-style-type: none"> <li>• Objection by Natural England to preferred site North of Downton Road adjacent to East Harnham Meadows SSSI, due to potential impacts from recreation and air quality on the grasslands.</li> <li>• Significant concerns by Highway's England about access to Quidhampton Quarry, albeit recognise it is not a preferred site.</li> <li>• Environment Agency raised concerns about preferred site at Old Sarum, which is adjacent to a Source Protection Zone (vulnerable to pollution).</li> <li>• Historic England raised concerns about: how development of preferred site at Old Sarum could be accommodated in sensitive and historic landscape setting; and for preferred sites at Downton Road, whether heritage and landscape constraints have been appropriately taken into consideration (Woodbury Scheduled Ancient Monument and heritage assets at Britford).</li> <li>• National Trust is concerned about further north-wards expansion of Salisbury that would have adverse impacts on landscape setting of Figsbury Ring (scheduled ancient monument).</li> </ul>
<b>Concept Plans</b>	
General public	<ul style="list-style-type: none"> <li>• Significant objections to Site 6, North of Downton Road (reasons see above).</li> <li>• Some support for custom and self-build housing.</li> </ul>

Developers and agents	<ul style="list-style-type: none"> <li>• Concerns over inclusion of custom and self-build housing.</li> <li>• Developers of preferred sites at Old Sarum and North of Downton Road have presented different approaches.</li> </ul>

### Planning for Trowbridge (397 comments, 360 respondents)

<b>Summary</b>	
<p>There was a significant level of objection to the scale of growth and preferred sites at Trowbridge. Traffic, specifically the volume and congestion that development would bring to that part of Trowbridge, Hilperton and Staverton receiving the most comments. Other specific issues raised, like Chippenham, include: the need to prioritise the redevelopment of brownfield sites first; the scale of growth (housing need), flood risk, infrastructure provision, biodiversity and landscape. Alternative sites were promoted through the consultation.</p>	
<b>Scale of Growth</b>	
General Public and Town and Parish Councils	<ul style="list-style-type: none"> <li>• Mixed opinion. However, more objections than support for proposed level of growth (reasons below).</li> <li>• Post COVID-19 and Brexit impacts not yet known.</li> <li>• Town needs regeneration and lacks adequate infrastructure.</li> <li>• Some requests for housing to be distributed to other towns and villages; including at Southwick and North Bradley or a new settlement created.</li> <li>• Scale of preferred sites inappropriate for Hilperton and Staverton – Hilperton is a Large Village, scale of growth contrary to Wiltshire Core Strategy.</li> <li>• Preferred sites would exacerbate commuting on congested roads and increase flood risk.</li> <li>• Allocated employment land should be considered for homes.</li> <li>• Growth should not be artificially inflated to justify a secondary school - rationale for secondary school is not explained.</li> <li>• Prioritise redevelopment of brownfield land, including vacant buildings in town centre, and set higher brownfield figure.</li> <li>• Objections due to climate change and loss of greenfield land.</li> <li>• Long-established, naturally integrated green spaces between settlements must be safeguarded against inappropriate development for mental and physical well-being.</li> <li>• Integrity and identity of Semington village must be maintained and protected from over-expansion of Trowbridge.</li> </ul>

Developer/agent	<ul style="list-style-type: none"> <li>• General agreement with Trowbridge's Principal Settlement status as focus for growth and level of growth, some stated it wasn't high enough.</li> <li>• Other comments impact of COVID-19 not yet known - advocates more decentralised strategy to meet growth with more development to market towns and rural areas.</li> <li>• Support for strategic site to be allocated that transcends into next plan period. Site large enough to promote self-containment</li> <li>• Suggestion that Trowbridge could do more if other settlements more constrained.</li> <li>• Growth distribution strategy too weighted towards large scale complex sites adjacent to principal settlements and less reliance should be placed upon volume home builders to deliver a small number of complicated strategic sites (for which there is poor delivery track record in Wiltshire).</li> <li>• Smaller sites, separate from the main allocation, will enable choice for developers and provision of self-build plots.</li> <li>• Brownfield target too high.</li> <li>• Economic evidence out of date; plan should enable more employment generating development.</li> <li>• Greenbelt review required at town.</li> <li>• New housing sites promoted: Green Belt sites; employment allocation at Ashton Park; additional land adjacent to preferred options.</li> </ul>
Others	<ul style="list-style-type: none"> <li>• Historic England consider greater clarity needed on how level of growth and proposals have considered and responded to historic environment (landscape setting and heritage assets).</li> <li>• Prioritisation of brownfield land, including underused heritage buildings, is supported but must be designed sensitively to historic environment.</li> <li>• Reappraise employment and economic growth and take realistic approach to housing numbers for a town which is swamped with commuters.</li> </ul>
<b>Place shaping Priorities</b> <ul style="list-style-type: none"> <li>•</li> </ul>	
General Public and Town and Parish Councils	<ul style="list-style-type: none"> <li>• Few comments from local councils, suggestion that vague and ineffective.</li> <li>• Some stated that the priorities are reasonable, but the strategy seems to bear little relationship to them.</li> <li>• Order of priorities should refocus on sustainability and climate change.</li> <li>• Impact of COVID-19 on town centre and new uses for vacant buildings (including residential uses), should be reflected.</li> <li>• Provision of services and amenities, such as health, play provision and the re-generation of the town centre should be prioritised.</li> </ul>

	<ul style="list-style-type: none"> <li>• Prioritise protecting village identities and importance of green infrastructure (including green belt and spaces), development should take place within town boundary not encroaching on villages.</li> <li>• Priorities are nearly all focused on the town, not enough about the villages and important greenspace around them.</li> <li>• Staverton should be one of the villages identified. Addressing traffic impact around the town and surrounding area should be prioritised e.g. Staverton bridge and Hilperton village despite Elizabeth Way.</li> </ul>
Developer/agent	<ul style="list-style-type: none"> <li>• Broad support for priorities.</li> <li>• Right priorities but don't appear to have necessarily informed preferred strategy for town.</li> <li>• Wording in priority (v) (bat mitigation) should be reviewed to ensure it has a 'place-shaping' focus and not one that limits development sites.</li> </ul>
Others	<ul style="list-style-type: none"> <li>• Historic England suggests the priorities could reflect positive strategy for conservation and enjoyment of the historic environment.</li> <li>• Sport England suggests the creation of a healthy, inclusive sustainable town can be achieved through use of their 'Active Design' guidance.</li> </ul>
<b>Preferred Sites</b>	
General Public and Town and Parish Councils	<ul style="list-style-type: none"> <li>• Considerable objections to all preferred sites.</li> <li>• Location for growth inappropriate - it does not share a contiguous boundary with the town; and goes beyond recently adopted settlement boundary.</li> <li>• Specific concerns about: <ul style="list-style-type: none"> <li>- traffic generation and congestion in Trowbridge, Hilperton and Staverton, impact on road network including Staverton Bridge and walking and cycling;</li> <li>- exacerbation of flood risk;</li> <li>- lack of infrastructure, including health care and local services;</li> <li>- loss of farmland;</li> <li>- impact on biodiversity and landscape;</li> <li>- loss of market value of existing homes</li> </ul> </li> <li>• Brownfield sites should be prioritised before greenfield - develop Bowyers site, East Wing, unused commercial land and premises etc</li> <li>• Capacity of preferred sites far exceeds any "local" needs.</li> <li>• Alternative sites/strategies suggested: Green Belt release (better locations to Trowbridge centre and station), dispersing growth to Southwick and North Bradley villages; adjacent to Green Lane Wood; Biss Farm employment allocation; either side A361 beyond rugby club; new settlement elsewhere (Hullavington, east of</li> </ul>

	<p>Devizes or west of Salisbury); locate neat new roads West Ashton, Melksham and Chippenham.</p>
Developer/agent	<ul style="list-style-type: none"> <li>• Support from land promoters within preferred sites, with feedback on proposals and objections on specific points on concept plan layouts.</li> <li>• Close collaborative working will be needed between Council and developer to ensure no viability challenges are created through development assumptions and policy requirements.</li> <li>• Developer's concern about extent of open space on their part of the allocation, preferring to see more housing.</li> <li>• Promoter of North East Trowbridge preferred site considers that land at Paxcroft Farm could be provided as 'Suitable Alternative Natural Greenspace' to provide recreation facilities to avoid harm to bats.</li> <li>• Questions raised about: site selection methodology and how Green Belt land has been dismissed; what is meant by a self-contained sustainable community; relationship of Staverton Road Bridge improvements to the preferred sites.</li> </ul>
Others	<ul style="list-style-type: none"> <li>• Natural England: Concerns raised, as preferred sites are in a medium risk area associated with important bat populations, ecological connectivity with the Kennet and Avon Canal important. Further assessment is needed and updating of Trowbridge Bat Mitigation Strategy to consider functionality of landscape including Hilperton Gap.</li> <li>• Local Plan must also consider potential designation of Trowbridge Woods as a SSSI.</li> <li>• Concerns raised by Wessex Water about scale of development, which is significant and requires major investment in networks and treatment. Clear guidance needed as to timescales and phasing to ensure strategies and investment can be in place.</li> </ul>

	<ul style="list-style-type: none"> <li>• Historic England suggests that greater clarity needed on how landscape setting of town and historic environment has informed site selection in accordance with national policy.</li> </ul>
<b>Concept Plans</b>	
General Public and Town and Parish Councils	<ul style="list-style-type: none"> <li>• Rather than providing comments about the concept plans, comments generally focused on in principle objections to the preferred sites being allocated (as set out above) - other comments relate to land being used for food production, open space for recreation.</li> <li>• Most disagree but conclude, if going to be built should: <ul style="list-style-type: none"> <li>- Examine potential for district heating systems. Otherwise use solar energy on homes. Mixed views on wind power.</li> <li>- Consider water source heat pumps utilising the canal as a heat source.</li> </ul> </li> </ul>
Others	<ul style="list-style-type: none"> <li>• Solar panels on roofs of all new buildings/ retrofitted on old buildings where possible.</li> <li>• New construction must meet highest standards of energy efficiency</li> </ul>
Developer/agent	<ul style="list-style-type: none"> <li>• Questions rationale for allocating green space on majority of site being promoted as part of preferred site, when series of smaller open spaces throughout the new allocation may be more appropriate.</li> <li>• Location of proposed uses are not agreed, and alternative plans are promoted.</li> <li>• Some support for masterplan and design code approach.</li> </ul>

## 6. Market Towns

6.1 Generally each local community was concerned about the scales of growth being proposed. Many wished to see brownfield development prioritised and as much as possible delivered so that it is the only form of development. Communities expressed how much they valued the character and setting to their settlements and saw greenfield development as likely to be harmful in those respects.

6.2 Developers on the other hand most often considered that scale of growth at Market Towns should be higher. Many supported this view on the basis that too many homes were being focussed at the Principal Settlements, contrasting the large urban extensions proposed there with the opportunities they said they could provide to deliver housing sooner and more easily.

6.3 There was more consensus around place shaping priorities. These seemed to be broadly in tune with the views of each community. However, there

were additional suggestions, alongside questioning of how priorities could be achieved.

6.4 The pool of sites suggested at each Market Town attracted a good proportion of comments from both the local community and others. These included comments from statutory agencies, like Natural England and Sport England, to sites that affected their interests, for example because of potential impacts on nearby Areas of Outstanding Natural Beauty or for potentially impeding the use of playing fields.

6.5 Historic England advises that the form and character of a town, within its wider landscape and historic setting, and the availability of suitable sites should inform the proposed scale of growth. To this end, it is suggested that the Council prepares a Heritage Topic Paper for each settlement and ensures that Conservation Area appraisals and management plans are kept up to date.

6.6 The Environment Agency highlight that Amesbury, Salisbury, Warminster, Devizes are within the River Hampshire Avon catchment which is currently failing protected area and Water Framework Directive objectives because of elevated phosphorus.

6.7 A summary of the main issues raised for each Market Town is set out below in alphabetic order.

<b>Planning for Amesbury (18 comments, 18 respondents)</b>	
<b>Respondent Type</b>	<b>Main Issues Raised</b>
Prescribed bodies including Town and Parish Councils	<p><b>Scale of Growth</b></p> <ul style="list-style-type: none"> <li>Town Council supports self-sufficient communities and balanced housing and employment growth. They are concerned the 350 additional homes suggested are top-down without adequate consideration of local factors.</li> <li>Town Council support separating Amesbury from Bulford and Durrington, but clarification is needed on each settlement's future housing requirement.</li> </ul> <p><b>Place Shaping Priorities</b></p> <ul style="list-style-type: none"> <li>Sport England supports the priority to improve recreational facilities and sports pitches in Amesbury.</li> <li>Town Council agrees with all place shaping priorities but considers that self-sufficiency also requires enough infrastructure to balance development.</li> </ul> <p><b>Pool of Sites</b></p> <ul style="list-style-type: none"> <li>MoD objects to Site 3 (south of Amesbury) due to the Aerodrome and Technical safeguarding zones associated with Boscombe Down. Natural England also highlights provisionally as Grade 3 Agricultural Land Classification (ALC)</li> </ul>

	<ul style="list-style-type: none"> <li>• Natural England objects to Site 2 (rear Countess services) – as it supports mixed area of both Deciduous Woodland and Lowland Fen registered as Priority Habitats.</li> <li>• Wessex Water prefers Sites 1 (north of Amesbury, south A303) and 3 (south of Amesbury) as seeming the most appropriate for connections to water services. Site 2, adjacent to sewage treatment works with a risk of reduced amenity due to fly and odour issues.</li> <li>• Town Council raises concerns for all three sites. Site 1 overlooks the A303; Site 2 is close to river and Site 3 is close to Boscombe Down. All three might result in adverse impacts on the World Heritage Site, and recreational pressures on the Salisbury Plain Special Protected Area (SPA). They suggest development of any sites would require contributes towards local infrastructure.</li> <li>• Highways England notes two sites are next to the A303 and there could be noise and air quality issues, which will need to be mitigated alongside any other impacts on the integrity of the asset.</li> </ul> <p><b>Other</b></p> <ul style="list-style-type: none"> <li>• Town Council suggests effects of the pandemic, move towards a Net Zero economy and increased working from home will change the needs of the population and shape requirements for Amesbury.</li> </ul>
Developer/agent	<p><b>Scale of Growth</b></p> <ul style="list-style-type: none"> <li>• Scale of growth should be increased because Amesbury not only serves residents of the town but also neighbouring areas.</li> <li>• Residual housing requirement should be increased from 350 dwellings to a minimum of approximately 1,500 dwellings for the period 2018-2040.</li> </ul> <p><b>Place Shaping Priorities</b></p> <ul style="list-style-type: none"> <li>• New proposed site at South West Amesbury could potentially deliver or facilitate several of the priorities by the provision of new in infrastructure.</li> <li>• Site 3 is large enough to accommodate a mixed-use development that includes new land for employment.</li> </ul> <p><b>Pool of Sites</b></p> <ul style="list-style-type: none"> <li>• New site proposed on land adjacent to High Post Business Park - 146.5 acres of land for employment use.</li> <li>• New site proposed on land west of A345 to the south of High Post (Fourmile Hill) - 355 acres of land for mixed use development.</li> <li>• New site proposed on land South West Amesbury as a development of approximately 1,200 new homes to include local village centre, community facilities, potential health hub, new primary school, green space and mobility hub.</li> </ul>

General Public	<p><b>Scale of Growth</b></p> <ul style="list-style-type: none"> <li>Views on the scale of growth were mixed. Some saw Army Re-basing already filling the towns 'quota' of additional homes.</li> </ul> <p><b>Place shaping priorities</b></p> <ul style="list-style-type: none"> <li>Priorities were generally acceptable.</li> <li>Additional infrastructure was necessary to accompany any additional growth. Health services and education provision is particularly limited.</li> <li>With few jobs there was little encouragement to live and work within the town.</li> </ul> <p><b>Other</b></p> <ul style="list-style-type: none"> <li>The town needed to be served by more shops</li> </ul>
Others	<p><b>Scale of Growth</b></p> <ul style="list-style-type: none"> <li>A local councillor suggests Amesbury has seen significant growth and that scale of development proposed would further constrain already limited infrastructure. There are also limited brownfield sites.</li> </ul> <p><b>Place Shaping Priorities</b></p> <ul style="list-style-type: none"> <li>A local councillor supports the priorities but suggests the integration of Boscombe Down and Amesbury should be included.</li> <li>Priorities supporting future development of Porton Down and Boscombe Down should be included.</li> </ul> <p><b>Pool of Sites</b></p> <ul style="list-style-type: none"> <li>A local councillor advises that Site 1 floods, noise pollution would be problematic on Site 2 and Boscombe Down could have adverse impacts on Site 3.</li> </ul> <p><b>Other</b></p> <ul style="list-style-type: none"> <li>Stagecoach support development on Land South West Amesbury, as it could underpin delivery of public transport infrastructure.</li> </ul>

<b>Planning for Bradford on Avon (674 comments, 667 respondents)</b>	
<b>Respondent Type</b>	<b>Main Issues Raised</b>
Prescribed bodies including Town and Parish Councils	<b>Scale of Growth</b>

	<ul style="list-style-type: none"> <li>• Natural England advise that air quality impacts from growth should be assessed.</li> <li>• Town Council considers the scale of growth acceptable if it can be delivered on brownfield sites determined by neighbourhood planning.</li> </ul> <p><b>Place Shaping Priorities</b></p> <ul style="list-style-type: none"> <li>• Town Council suggests there should be more detailed reference to the need to address the climate emergency and biodiversity.</li> <li>• Town Council also considers there should be stronger recognition of heritage, landscape setting and infrastructure constraints affecting the town.</li> <li>• Town Council question's whether land should be provided for employment.</li> </ul> <p><b>Pool of Sites</b></p> <ul style="list-style-type: none"> <li>• Sport England objects to Site 3 (golf course) unless golf course is shown to be surplus and Natural England raise concerns about potential loss of green infrastructure.</li> <li>• Of three sites, Town Council suggested only a small part of Site 2 (land north of Holt Road) might have some potential for development. Any sites should be identified by neighbourhood planning.</li> </ul>
Developer/agent	<p><b>Scale of Growth</b></p> <ul style="list-style-type: none"> <li>• Scale of growth should be higher as the town has a range of services and facilities and a pronounced need for affordable homes.</li> <li>• A supply relying on small windfall sites cannot respond flexibly to changes in demand and will not deliver affordable homes.</li> <li>• Town does not have a good supply of previously developed land and the role of a brownfield target is unclear.</li> </ul> <p><b>Place Shaping Priorities</b></p> <ul style="list-style-type: none"> <li>• Proposed growth will not be enough to address the priority for affordable housing in the town</li> <li>• Employment and economy is stated as a priority but no provision suggested for additional land.</li> </ul> <p><b>Pool of Sites</b></p> <ul style="list-style-type: none"> <li>• Sites 2 (land north of Holt Road) and 3 (golf course) have been promoted for development confirming availability.</li> <li>• Site 1 (allotments) has not been formally promoted but it has been suggested that it can be developed in combination with site 2, with relocation of allotments to an area within site 2.</li> <li>• Alternatives or additions to the sites are promoted at the Football Ground, North of Poulton Lane, Land parcels off Bath Road, Leigh Road West and Trowbridge Road (to rear of Beehive). All except the football ground are Green Belt.</li> </ul>

	<p><b>Other</b></p> <ul style="list-style-type: none"> <li>• There should be a review of Green Belt boundaries and the neighbourhood plan should plan more positively to meet needs.</li> </ul>
General Public	<p><b>Scale of Growth</b></p> <ul style="list-style-type: none"> <li>• Scale of growth too high and would exceed the capacity of local infrastructure. It would create unacceptable environmental harm, including to local air quality.</li> <li>• Small minority supported a higher scale pointing to a local need for affordable homes.</li> </ul> <p><b>Place Shaping Priorities</b></p> <ul style="list-style-type: none"> <li>• No proposals for additional employment land provision undermine a priority to support the economy.</li> <li>• Strong support for pedestrian/cycle bridge across the River Avon.</li> <li>• Town should have a by-pass.</li> <li>• Green space and biodiversity should have greater recognition.</li> </ul> <p><b>Pool of Sites</b></p> <ul style="list-style-type: none"> <li>• Significant scale of objections to all three sites for a variety of reasons, particularly Site 3 (golf course). Sites 1 and 3 (allotments) are valued community spaces</li> <li>• Some indicated that site 2 would be preferred out of the three and a minority of others thought that the golf course would be preferable.</li> <li>• Sites were suggested adjacent to Beehive (Green Belt), the undergrounding of Station Car Park to free up land and land along Winsley Road (Green Belt).</li> </ul> <p><b>Other</b></p> <ul style="list-style-type: none"> <li>• Some suggested that homes could be provided by converting vacant retail.</li> <li>• Impact of COVID-19 and the future of the town centre were raised as concerns</li> </ul>

<b>Planning for Calne</b>	
<b>Respondent Type</b>	<b>Main Issues Raised</b>
Prescribed bodies including Town and Parish Councils	<p><b>Scale of Growth</b></p> <ul style="list-style-type: none"> <li>• Town Council accepted suggested scale subject to concerns about employment and infrastructure being addressed.</li> </ul>

	<p>Employment land at Oxford Road and Spitfire Way should be safeguarded and employment provided as a priority.</p> <ul style="list-style-type: none"> <li>• Significant additional growth could potentially deliver an eastern bypass.</li> </ul> <p><b>Place Shaping Priorities</b></p> <ul style="list-style-type: none"> <li>• Town Council listed key priorities as: <ul style="list-style-type: none"> <li>- Protect and provide sites for employment - early provision;</li> <li>- Provision of open space and allotment land;</li> <li>- Provision of land suitable for cemetery space;</li> <li>- Improvements to existing and new pedestrian and cycle routes;</li> <li>- A Town Centre levy; and</li> <li>- Provision of Primary School places and NHS services.</li> </ul> </li> </ul> <p>Calne Without Parish Council believes the priorities should be determined in the Neighbourhood Plan and include provision of infrastructure such as broadband in rural areas.</p> <p><b>Pool of Sites</b></p> <ul style="list-style-type: none"> <li>• Calne Without Parish Council consider it would be appropriate to examine the feasibility of developing sites that would bring together existing new development on the edge of town</li> <li>• Natural England raise concerns about the cumulative impacts that development of sites 2, 3 and 4 may have on the Area of Outstanding Natural Beauty</li> <li>• Wessex Water state that sites to the west of Calne have more potential spare capacity, although significant development to the east could lead to significant capacity improvements</li> <li>• Historic England note that several proposed sites adjoin or affect the setting of designated heritage assets. Their significance needs to be determined and applied to inform site suitability</li> </ul>
Developer/agent	<p><b>Scale of Growth</b></p> <ul style="list-style-type: none"> <li>• Calne is capable, and suitable for accommodating a higher level of growth to meet housing needs and to support economic growth.</li> <li>• Proposed level of growth should be higher to achieve transport solutions to alleviate air quality issues.</li> <li>• Calne is not significantly constrained in environmental terms.</li> <li>• Question whether brownfield sites are available for 60 dwellings and can be viably developed.</li> </ul> <p><b>Place Shaping Priorities</b></p> <ul style="list-style-type: none"> <li>• Meeting the range of housing needs, particularly for older people and affordable homes, should be recognised by a higher scale of growth.</li> <li>• It is stated in the settlement profile for Calne that significant additional growth could potentially deliver an eastern bypass - this should be included in the strategic priorities.</li> </ul>

	<p><b>Pool of Sites</b></p> <ul style="list-style-type: none"> <li>• General agreement that this is the right pool of sites for the Council to be considering at this time; but Council need to demonstrate they have considered all reasonable alternatives.</li> <li>• Given past delivery rates of new homes on brownfield land it is highly unlikely that Calne's housing needs can be met in full using brownfield land.</li> <li>• Three new sites were put forward for consideration through the site selection process.</li> </ul>
General Public	<p><b>Scale of Growth</b></p> <ul style="list-style-type: none"> <li>• There is a lack of infrastructure at Calne to cope with significantly higher growth.</li> <li>• Brownfield target should be much higher.</li> <li>• Any growth should lead to improvement in town centre services and amenities.</li> <li>• Significant number of comments supporting an eastern bypass between Sand Pit Rd and A4 at Quemerford.</li> </ul> <p><b>Place Shaping Priorities</b></p> <ul style="list-style-type: none"> <li>• Priorities are supported but question how they will be achieved.</li> <li>• Town centre regeneration urgently needed - town has a much larger population than the centre would suggest with a lack of shops, pubs and amenities.</li> <li>• GP, dental surgeries and more shops are needed.</li> <li>• Growth should seek transport solutions to alleviate town centre congestion and air quality concerns.</li> <li>• Local green spaces and biodiversity are highly valued by local people.</li> </ul> <p><b>Pool of Sites</b></p> <ul style="list-style-type: none"> <li>• Any development should make full use of all available brownfield sites before encroaching onto greenfield sites.</li> <li>• Sites around Calne received various objections and support depending on where people live.</li> <li>• Sites should be chosen that have good access to the transport network and employment.</li> <li>• Sites to be developed should be decided through the neighbourhood plan process.</li> <li>• Site 4 is very large and if developed should provide for an eastern bypass linking Sand Pit Road/Oxford Road with the A4 at Quemerford.</li> </ul> <p><b>Other</b></p> <ul style="list-style-type: none"> <li>• Desire to develop links with Bath University, Swindon colleges and other centres of learning to create opportunities for new environmental and economic business to revitalise Calne</li> </ul>

	<ul style="list-style-type: none"> <li>• Important that any development is aesthetically pleasing, allowing residents to integrate into the community, adding value to the town</li> <li>• Sustainability needs to be given much greater importance in all respects - site location, method of building, house insulation, heating systems, cycle routes, access to public transport etc.</li> </ul>
Others	<p><b>Scale of Growth</b></p> <ul style="list-style-type: none"> <li>• Scale of growth should be constrained until Neighbourhood Plan has completed an assessment of town centre brownfield sites in the light of pandemic.</li> </ul>

<b>Planning for Corsham (40 comments, 40 respondents)</b>	
<b>Respondent Type</b>	<b>Main Issues Raised</b>
Prescribed bodies including Town and Parish Councils	<p><b>Scale of Growth</b></p> <ul style="list-style-type: none"> <li>• Town Council considers levels of growth above those proposed would put undue pressure on local health services.</li> </ul> <p><b>Place Shaping Priorities</b></p> <ul style="list-style-type: none"> <li>• General support for the priorities with rewording suggested.</li> </ul> <p><b>Pool of Sites</b></p> <ul style="list-style-type: none"> <li>• Town Council support for sites 5 (The Circus), part of 3 (Land east of Lypiatt Road and west of B3353) and part of 4 (Land east of Leafield Trading Estate and west of Lypiatt Road).</li> <li>• They also outline opportunities to consider land excluded at Potely Rise and Copenacre.</li> <li>• Town Council object to further consideration of Sites 1 (Pickwick Paddock, Bath Road), 2 (Land South of Brook Drive), and 6 (Land to the North of 16 Bradford Road).</li> <li>• Natural England objects to Sites 5 (The Circus) and 6 (Land to the North of 16 Bradford Road) due to potential impacts on Bath and Bradford on Avon Bats Special Area of Conservation (SAC), Box Mine Site of Special Scientific Interest (SSSI), Corsham Railway Cutting SSSI and Cotswold Area of Outstanding Natural Beauty.</li> <li>• Potential for all sites to impact on Bath and Bradford on Avon Bats SAC. Detailed consideration of this is required during further assessment.</li> </ul> <p><b>Other</b></p> <ul style="list-style-type: none"> <li>• Need to protect the local mining industry.</li> <li>• Protection of the green buffer.</li> <li>• Local infrastructure improvements i.e. healthcare and roads.</li> </ul>

<p>Developer/agent</p>	<p><b>Scale of Growth</b></p> <ul style="list-style-type: none"> <li>• Support for additional growth at Corsham.</li> <li>• Opportunity to increase requirements at Corsham to ensure housing needs are met across Chippenham Housing Market Area.</li> <li>• Brownfield target should be avoided or clearly evidenced.</li> <li>• Plan period should be extended and the housing requirement for Corsham increased to reflect this.</li> </ul> <p><b>Place Shaping Priorities</b></p> <ul style="list-style-type: none"> <li>• Development to south of Corsham would help avoid coalescence with villages to the west and should be a priority.</li> <li>• A priority should be the enhancement of existing public transport.</li> </ul> <p><b>Pool of Sites</b></p> <ul style="list-style-type: none"> <li>• Brownfield sites should be included in the pool, including former RAF Rudloe Manor and other brownfield sites which fall outside of, but are well related to, main settlements.</li> <li>• General support provided for pool of sites as proposed.</li> <li>• All sites are actively promoted, except Site 5 (The Circus), which is not available for development at this time.</li> <li>• Three sites excluded at stage two are promoted.</li> </ul>
<p>General Public</p>	<p><b>Scale of Growth</b></p> <ul style="list-style-type: none"> <li>• Additional growth should be as minimal as possible and is potentially too high as proposed.</li> <li>• Any additional homes should be on brownfield sites.</li> <li>• Need for clarity relating to the brownfield target, which is higher than the residual number of homes to plan for.</li> <li>• Transport infrastructure improvements and local facilities, such as schools and healthcare need to accompany new development.</li> </ul> <p><b>Place Shaping Priorities</b></p> <ul style="list-style-type: none"> <li>• Priorities need updating to reflect impacts of the COVID-19 pandemic on shopping habits. The need for the provision of a second supermarket is questioned.</li> <li>• Need for improved social infrastructure, particularly local health services.</li> <li>• Addressing climate change, particularly renewable energy opportunities, need to be incorporated.</li> <li>• Local transport infrastructure improvements, particularly sustainable transport modes.</li> </ul> <p><b>Pool of Sites</b></p>

	<ul style="list-style-type: none"> <li>• Generally, the further consideration of any greenfield sites is argued. Brownfield sites within the town should be considered.</li> <li>• All sites are subject to objections, most pointedly Sites 3 (Land east of Lypiatt Road and west of B3353) and 4 (Land east of Leafield Trading Estate and west of Lypiatt Road).</li> <li>• Some support for Sites 1 (Pickwick Paddock, Bath Road) and 6 (Land to the north of 16 Bradford Road).</li> </ul> <p><b>Other</b></p> <ul style="list-style-type: none"> <li>• Joined up approach needed with carbon reduction targets.</li> </ul>
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<b>Planning for Devizes (118 comments, 111 respondents)</b>	
<b>Respondent Type</b>	<b>Main Issues Raised</b>
Prescribed bodies including Town and Parish Councils	<p><b>Scale of growth</b></p> <ul style="list-style-type: none"> <li>• Devizes Town Council and Neighbourhood Planning Group (NPG) state that it is not sustainable to plan for more housing than is needed for the local population. Level of growth proposed would decrease self-containment and increase traffic at peak times. More consideration to be given to type of housing needed to suit the population profile.</li> <li>• Potterne Parish Council supports brownfield development close to the town centre to avoid further traffic congestion.</li> </ul> <p><b>Place Shaping Priorities</b></p> <ul style="list-style-type: none"> <li>• Devizes Town Council and NPG consider high priority should be given to the North Wessex Down Area of Outstanding Natural Beauty (AONB). More recognition is needed of the landscape setting of the town.</li> <li>• More reference to proposed 'Devizes Gateway Rail Station'; more focus on homes to meet local needs; and more detail on design.</li> </ul> <p><b>Pool of Sites</b></p> <ul style="list-style-type: none"> <li>• Natural England do not support: Site 1 (land adjoining Lay Wood) due to impact on AONB and restriction on movement of species in Lay Wood from wider landscape to east; Site 2 (land at Coate Bridge) due to impact on AONB. They consider Site 3 (land east of Windsor Drive) would need careful consideration due to AONB setting and nearby allotments as green infrastructure asset.</li> <li>• Historic England seek clarification that proposals have considered and responded to the historic environment - town's history, character and landscape setting surrounding heritage assets.</li> </ul>

	<ul style="list-style-type: none"> <li>• Devizes Town Council and NPG favours smaller sites in line with the neighbourhood plan, and brownfield sites (Devizes Wharf Regeneration project, hospital site and land linked to Green Lane treatment centre).</li> <li>• Devizes Town Council and NPG object to: <ul style="list-style-type: none"> <li>- Site 1 (Land adjoining Lay Wood) due to impact on AONB setting and distance from the town centre (more than 20 minutes walking distance).</li> <li>- Site 2 (Land at Coate Bridge) due to impact on rural setting.</li> <li>- Site 4 (Broadway Farm) due to distance from town centre.</li> <li>- Site 6 (Greencare Nursery) due to proximity to woods.</li> <li>- Site 7 (Caen Hill Farm and Garden Trading Estate) due to access and impact on landscape setting.</li> </ul> </li> <li>• Devizes Town Council and NPG suggest Sites 3 and 5 should be reduced and consider Site 8 suitable due to proximity to town centre.</li> <li>•</li> </ul>
Developer/agent	<p><b>Scale of Growth</b></p> <ul style="list-style-type: none"> <li>• Support for the level of growth and calls for a higher housing requirement for Devizes.</li> <li>• Brownfield sites are difficult to deliver, a more balanced approach to housing delivery should be sought rather than brownfield first.</li> <li>• Further greenfield sites should be identified.</li> <li>• Brownfield target is based on historic windfall and there may not be enough deliverable sites.</li> </ul> <p><b>Place Shaping Priorities</b></p> <ul style="list-style-type: none"> <li>• There is general support for the place making priorities.</li> </ul> <p><b>Pool of Sites</b></p> <ul style="list-style-type: none"> <li>• Plan should not just focus on strategic and complex sites but identify moderate and small sized sites.</li> <li>• Brownfield sites have been promoted at: Wadworth Brewery site, Devizes School and two sites that will be surplus to NHS requirements - the old Devizes hospital site when the new Integrated Care Centre opens and Southgate House.</li> <li>• Some housing should be allowed on the Wiltshire Core Strategy Horton Road employment site allocation.</li> <li>• Sites 3 and 4 are being promoted together and can be combined with an adjoining site - land east of Windsor Drive.</li> <li>• Additional land is promoted: to increase Sites 5 and 8, and Site 2 with benefit of connection with the Canal; new land south of Marshall Road has been promoted; existing neighbourhood plan allocation at Hillworth Road is promoted together with an adjoining site.</li> </ul>
General Public	<p><b>Scale of Growth</b></p> <ul style="list-style-type: none"> <li>• Some responses called for development to occur on brownfield sites only.</li> </ul>

	<ul style="list-style-type: none"> <li>• Scale of growth generally considered to be too high or ‘about right’</li> <li>• Those of objecting to high level were concerned about traffic and air quality issues; lack infrastructure including GP surgeries, dentists, roads and schools; loss of agricultural land; impact on wildlife; and landscape impact.</li> </ul> <p><b>Place Shaping Priorities</b></p> <ul style="list-style-type: none"> <li>• General support for place shaping priorities.</li> <li>• Further emphasis could be added on protection of natural environment, biodiversity and greater access to green spaces in the town.</li> <li>• Development should not exacerbate traffic problems in town</li> <li>• Consider access to potential Lydeaway train station.</li> <li>• Lack of infrastructure for new housing</li> <li>• Heritage value of town should be emphasised.</li> <li>• Greater recognition of Devizes Wharf regeneration, vitality of the town centre and good design.</li> </ul> <p><b>Pool of Sites</b></p> <ul style="list-style-type: none"> <li>• Many object to the Site 6 (Greenacres Nursery) due to existing use by community as greenspace as well as its importance for biodiversity, including bats.</li> <li>• Site 6 incorrectly classified as brownfield land.</li> <li>• Objections to all other Sites, particularly Site 2 (land at Coate Bridge) and Site 5 (land off the A342 and Sleight Road).</li> <li>• Underused retail and commercial units should be redeveloped for housing.</li> <li>• Empty properties should be tackled.</li> <li>• Windsor Drive is an effective outer boundary to the town.</li> </ul>
Others	<p><b>Scale of Growth</b></p> <ul style="list-style-type: none"> <li>• North Wessex Downs AONB consider growth to be okay, and support brownfield target due to landscape constraints at town.</li> <li>• Trust for Devizes consider growth to be about right but raise concerns about growth elsewhere and need to maintain housing land supply to avoid impact on Devizes.</li> </ul> <p><b>Place Shaping Priorities</b></p> <ul style="list-style-type: none"> <li>• Trust for Devizes consider: higher recognition of AONB and setting of the town is needed; vitality and viability of the town centre must be considered, particularly following COVID; the renewal of Devizes Wharf and restoration of Assize Court are crucial for the town.</li> <li>• The Devizes Assize Courts Trust call for specific heritage related place shaping priority to recognise heritage value in town as well as referencing the aims of the Devizes Wharf project and role that Assize Court play in that.</li> </ul>

	<ul style="list-style-type: none"> <li>• North Wessex Down AONB comment little weight has been given to the setting of the AONB.</li> </ul> <p><b>Pool of Sites</b></p> <ul style="list-style-type: none"> <li>• North Wessex Down AONB don't support Sites 1, 2 and 3 due to impact on landscape setting.</li> <li>• Canal and River Trust consider Sites 1 and 2 should contribute to enhancements to the canal towpath.</li> </ul>
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<b>Planning for Malmesbury (61 comments, 61 respondents)</b>	
<b>Respondent Type</b>	<b>Main Issues Raised</b>
Prescribed bodies including Town and Parish Councils	<p><b>Scale of Growth</b></p> <ul style="list-style-type: none"> <li>• The Town Council (on behalf of the Joint Neighbourhood Plan Working Group (JNPWG)) consider the suggested scale of growth to be unsustainable because of the pressures on local infrastructure that would result; and there is no local need for more homes.</li> </ul> <p><b>Place Shaping Priorities</b></p> <ul style="list-style-type: none"> <li>• The Town Council (JNPWG) support recognition and support for the special irreplaceable characteristics of the town, including landscape, heritage and ecology. Priorities should extend to climate change and encompass a town centre strategy</li> </ul> <p><b>Pool of Sites</b></p> <ul style="list-style-type: none"> <li>• The Town Council (JNPWG) identify constraints and object to all the pool of sites. Additional greenfield sites are not needed and should not therefore be considered.</li> <li>• Natural England raise concerns about the impacts that development of Sites 4 and 5 to west of town may have on the Area of Outstanding Natural Beauty</li> <li>• Sport England object to the potential loss of the cricket club in Site 1.</li> </ul> <p><b>Other</b></p> <ul style="list-style-type: none"> <li>• Town Council (JNPWG) consider there should not be a target for housing on brownfield land. Opportunities are limited and it would lead to the loss of other uses important to the town to residential redevelopment.</li> <li>• Town Council (JNPWG) identify a range of other issues (such as traffic, education and sport and leisure that are referenced in the Neighbourhood Plan)</li> </ul>
Developer/agent	<b>Scale of Growth</b>

	<ul style="list-style-type: none"> <li>• The proposed level of planned growth is too low.</li> <li>• The town is a sustainable location for further growth to meet needs for affordable homes and help support local economic growth</li> <li>• There is insufficient justification for curtailing continued growth below past rates</li> </ul> <p><b>Place Shaping Priorities</b></p> <ul style="list-style-type: none"> <li>• A priority to meet the housing range needs, particularly affordable homes, should be recognised by a higher scale of growth</li> <li>• Economic growth prospects should be matched by allocating land for business development</li> </ul> <p><b>Pool of Sites</b></p> <ul style="list-style-type: none"> <li>• Sites 1, 4 and 5 were supported by developers, landowners or their agents.</li> <li>• Five other parcels of land were suggested as fresh opportunities or land that should not have been rejected</li> </ul>
General Public	<p><b>Scale of Growth</b></p> <ul style="list-style-type: none"> <li>• The proposed level of planned growth is too high. The character and attractiveness of the settlement will be harmed, including access to limited and diminishing green space</li> <li>• There is insufficient infrastructure to support further significant development.</li> <li>• Levels of growth should respect proposals in the neighbourhood plan.</li> </ul> <p><b>Place Shaping Priorities</b></p> <ul style="list-style-type: none"> <li>• There should be greater recognition of the distinctiveness of the town, preserving its historic character and setting.</li> <li>• The town centre has an important role and character that should be protected and supported.</li> <li>• There should be a greater reference to meeting the needs of the young</li> <li>• Priorities should recognise needs for local sports and leisure provision</li> </ul> <p><b>Pool of Sites</b></p> <ul style="list-style-type: none"> <li>• The scope for development shown by a pool of sites does not correspond to the scale of growth proposed.</li> <li>• The only sites that should be developed are those in the neighbourhood plan or brownfield sites</li> <li>• Site 1 had the most objections largely because of its size, the threat to the cricket club and the impact development would have on the town's surroundings</li> </ul>

	<p><b>Other</b></p> <ul style="list-style-type: none"> <li>• There should be a greater emphasis upon tackling climate change.</li> <li>• The character of the town was already under threat from development that would harm it.</li> </ul>
Others	<p><b>Pool of Sites</b></p> <ul style="list-style-type: none"> <li>• The Malmesbury River Valleys Trust highlights the role of site 1 in mitigating flood risks and as a site of biodiversity value.</li> </ul>

<b>Planning for Marlborough (52 comments, 48 respondents)</b>	
<b>Respondent Type</b>	<b>Main Issues Raised</b>
Prescribed bodies including Town and Parish Councils	<p><b>Scale of Growth</b></p> <ul style="list-style-type: none"> <li>• Preshute Parish Council voiced objection to levels of housing and employment land that had not directly been tested, believing it unsustainable. Justification base on need for affordable housing is not fully evidenced.</li> <li>• Marlborough Area Neighbourhood Plan Steering Group (MANPSG) and Marlborough Town Council called for more detailed assessment of capacity for brownfield land to provide new homes.</li> </ul> <p><b>Place Shaping Priorities</b></p> <ul style="list-style-type: none"> <li>• The MANPSG and Marlborough Town Council generally support for priorities but wished to see the findings of their work on these to be given consideration.</li> </ul> <p><b>Pool of Sites</b></p> <ul style="list-style-type: none"> <li>• Natural England is concerned by Site 1's proximity to River Kennet SSSI and does not support Site 2 due to proximity of priority habitat. They raise the importance Savernake Forest SSSI and disused railway tunnel for species (bats).</li> <li>• The Environment Agency comments that the effect of climate change on the fluvial flood levels from the river may affect lower areas on Site 1; and as Site 2 lies almost entirely within Source a Protection Zone for Marlborough public water supply borehole it is not taken forward.</li> <li>• Sport England raised concern over Site 3 due to its proximity to playing fields, outlining no land should be developed on or impacting sports facilities.</li> <li>• Preshute Parish Council raised concerns about landscape character and impact on the AONB.</li> <li>• The MANPG and Marlborough Town Council referred to site selection work they undertook to allocate sites within their</li> </ul>

	<p>neighbourhood plan and highlighted that some sites appearing in the Site Selection Report had been identified as unviable.</p> <p><b>Other</b></p> <ul style="list-style-type: none"> <li>• The MANPSG and Marlborough Town Council outlined concerns regarding the impact of growth on education capacity, highway network and traffic congestion.</li> <li>• The MANPSG and Marlborough Town Council outlined a need to provide sports and leisure facilities.</li> </ul>
Developer/agent	<p><b>Scale of Growth</b></p> <ul style="list-style-type: none"> <li>• The scale of growth was broadly supported noting the need to provide more affordable homes.</li> <li>• The Council should undertake a more detailed assessment of capacity for brownfield land to provide new homes.</li> </ul> <p><b>Place Shaping Priorities</b></p> <ul style="list-style-type: none"> <li>• Broad agreement that affordable housing needs are met as part of a mixed and balanced community.</li> </ul> <p><b>Pool of Sites</b></p> <ul style="list-style-type: none"> <li>• The withdrawal of Preshute from the Marlborough Area Neighbourhood Plan means some sites cannot be considered by the that Plan that may be preferable. This should not influence the Local Plan Review.</li> <li>• Sites 3 and 4 can deliver a healthcare facility and primary school land.</li> </ul>
General Public	<p><b>Scale of Growth</b></p> <ul style="list-style-type: none"> <li>• There were concerns about the scale of growth being justified by a need of affordable housing that is not fully evidenced.</li> <li>• There was concern that additional housing was not being matched by equivalent new employment.</li> <li>• Growth should not put undue pressure on local infrastructure. In particular there were concerns about the effects of traffic, including HGVs and concerns about air quality.</li> </ul> <p><b>Place Shaping Priorities</b></p> <ul style="list-style-type: none"> <li>• Many were concerned about protecting the towns assets and character, in particular landscape value and biodiversity of natural space.</li> <li>• The impacts of the COVID-19 pandemic need consideration in relation to changing travel patterns and need for employment land.</li> <li>• Town centre should be enhanced.</li> <li>• Affordable housing should be genuinely affordable.</li> </ul> <p><b>Other</b></p>

	<ul style="list-style-type: none"> <li>There were contrasting views on the role of the Neighbourhood Plan. One view was that neighbourhood planning should allocate sites for development. A different view was that the Local Plan should lead the planning process.</li> </ul>
Others	<p><b>Scale of Growth</b></p> <ul style="list-style-type: none"> <li>North Wessex Downs AONB support the need for new development but advise this should be prioritised on brownfield land.</li> </ul> <p><b>Place Shaping Priorities</b></p> <ul style="list-style-type: none"> <li>North Wessex Downs AONB broadly support the place shaping priorities, offering refinements.</li> <li>Higher priority should be given to environmental considerations and net zero by 2030.</li> </ul> <p><b>Pool of Sites</b></p> <ul style="list-style-type: none"> <li>North Wessex Downs AONB did not support the pool of potential development sites due to landscape sensitivities and ecological habitats. Consideration should be given to dark skies.</li> </ul>

<b>Planning for Melksham (102 comments, 95 respondents)</b>	
<b>Respondent Type</b>	<b>Main Issues Raised</b>
Prescribed bodies including Town and Parish Councils	<p><b>Scale of Growth</b></p> <ul style="list-style-type: none"> <li>Joint response of Melksham Without Parish Council (MWPC), Melksham Town Council (MTC) and Melksham Neighbourhood Plan Steering Group (MNPSG) - consider there has been a disproportionate uplift to Chippenham HMA and thus Melksham specifically.</li> <li>MWPC/MTC/MNPSG wish to see additional employment land allocated at Melksham</li> <li>MWPC/MTC/MNPSG strongly supportive of development of brownfield land being prioritised</li> <li>Wessex Water consider development proposed at Melksham is significant and appraisal will be required to consider solutions and how best to direct investment for growth.</li> </ul> <p><b>Place Shaping Priorities</b></p> <ul style="list-style-type: none"> <li>MWPC/MTC/MNPSG generally supportive of priorities but suggest some amendments.</li> <li>MWPC/MTC/MNPSG - Melksham and Bowerhill have reached a point where much of its existing market town infrastructure is at or over capacity. Growth must be linked to delivery of</li> </ul>

	<p>infrastructure (schools, healthcare and community facilities) and investment in the town centre.</p> <ul style="list-style-type: none"> <li>• MWPC/MTC/MNPSG supportive of A350 bypass but consider larger scale planned growth should be delivered with and not before its delivery.</li> </ul> <p><b>Pool of Sites</b></p> <ul style="list-style-type: none"> <li>• MWPC/MTC/MNPSG consider that Sites 1, 9, 10, 11, 13, 17 are most suitable for development and suggest an alternative site (Cooper Tires brownfield site) is also suitable.</li> <li>• Historic England note several sites adjoin or affect the setting of designated heritage assets. Their significance needs to be determined and applied to inform site suitability.</li> <li>• Semington Parish Council is seeking a 500m no development zone to the north of the Kennet and Avon canal if Sites 5, 6 or 7 are allocated for development.</li> <li>• Sport England is concerned that Site 1 would prevent Melksham football and rugby club from expanding its facilities and that careful masterplanning will be required</li> </ul> <p><b>Other</b></p> <ul style="list-style-type: none"> <li>• Canal &amp; River Trust request early engagement if bypass route to cross River Avon</li> <li>• Environment Agency highlight need for detailed flood risk assessment for the Melksham link project that will connect with the River Avon; and potential for integrated approach to navigation and flood risk.</li> </ul>
Developer/agent	<p><b>Scale of Growth</b></p> <ul style="list-style-type: none"> <li>• Most consider level of growth is appropriate, but some think it is too low.</li> <li>• Town is a sustainable location for further growth to meet needs for affordable homes and support local economic growth</li> <li>• Seek review of decision not to allocate employment land at Melksham.</li> <li>• General support for brownfield site development but this should not impact on the overall phasing and delivery of other sites that will be required.</li> </ul> <p><b>Place Shaping Priorities</b></p> <ul style="list-style-type: none"> <li>• General support for the priorities.</li> <li>• Support the proposed A350 bypass as it is needed as a strategic corridor.</li> <li>• Education, health care and transport improvements are rightly key infrastructure priorities that need to be addressed by new developments.</li> </ul> <p><b>Pool of Sites</b></p> <ul style="list-style-type: none"> <li>• General support for the pool of sites proposed.</li> </ul>

	<ul style="list-style-type: none"> <li>• Acknowledgment that several large sites may be needed to meet housing requirement.</li> <li>• Three new sites were promoted for development (land at Verbena Court/Eastern Way, land north and west of Manor Farm and land between Eastern Way and Site 1).</li> </ul>
General Public	<p><b>Scale of Growth</b></p> <ul style="list-style-type: none"> <li>• Proposed level of growth is far too high for a town the size of Melksham.</li> <li>• Melksham should retain its rural market town feel.</li> <li>• There should be a more equal distribution of new housing to other settlements in the HMA.</li> <li>• Brownfield target is not ambitious enough.</li> <li>• This high level of growth will add to coalescence with the villages of Bowerhill and Berryfield.</li> <li>• There is insufficient infrastructure to support further significant development, especially schools, GP surgeries and dentists.</li> <li>• Significant growth should not come forward before a bypass is in place as it will only add to A350 traffic congestion.</li> </ul> <p><b>Place Shaping Priorities</b></p> <ul style="list-style-type: none"> <li>• General support for the priorities.</li> <li>• Natural environment along the River Avon corridor should be protected.</li> <li>• New development must support regeneration of the town centre.</li> <li>• Widespread support for Wilts &amp; Berks Canal restoration.</li> <li>• Kennet and Avon Canal must retain its rural character.</li> <li>• The town needs more GP and dental surgeries and a new secondary school.</li> <li>• There is generally a mixed response to the need for an A350 bypass - some believe it is urgently needed, some believe it is not a priority.</li> </ul> <p><b>Pool of Sites</b></p> <ul style="list-style-type: none"> <li>• There should be a policy of developing brownfield sites first and a higher brownfield target.</li> <li>• The only sites that should be developed are brownfield sites and those allocated through the neighbourhood plan process.</li> <li>• A priority should be the redevelopment of the Cooper Tires site which could aid town centre regeneration.</li> </ul> <p><b>Other</b></p> <ul style="list-style-type: none"> <li>• There should be a greater emphasis on tackling climate change and enhancing biodiversity.</li> <li>• An eastern bypass will have significant landscape and biodiversity impacts.</li> </ul>

	<ul style="list-style-type: none"> <li>Infrastructure, especially schools, transport and healthcare must come first before any new housing.</li> </ul>
Others	<p><b>Scale of Growth</b></p> <ul style="list-style-type: none"> <li>Stagecoach consider that Melksham has potential to support growth on a strategic scale and they see scope to develop the level of public transport provision substantially</li> <li>National Trust is concerned that development to the north and east of Melksham will add to rat-running issues through Lacock.</li> </ul> <p><b>Place Shaping Priorities</b></p> <ul style="list-style-type: none"> <li>Strong support for the safeguarding of route for the canal and restoration by Wilts and Berks Canal Trust.</li> </ul>

<b>Planning for Royal Wotton Bassett (59 comments, 57 respondents)</b>	
<b>Respondent Type</b>	<b>Main Issues Raised</b>
Prescribed bodies including Town and Parish Councils	<p><b>Scale of Growth</b></p> <ul style="list-style-type: none"> <li>Royal Wootton Bassett Town Council is only supportive of the proposed level of growth if it can be assured that the infrastructure improvements to support it can be delivered.</li> <li>Wessex Water state that significant improvements are likely to be required to support this scale of growth.</li> <li>Highways England notes a potentially significant level of development and obstacles to overcome if growth is to be successfully delivered (traffic at Junction 16 and within the town), further information is sought on mitigation.</li> </ul> <p><b>Place Shaping Priorities</b></p> <ul style="list-style-type: none"> <li>The Town Council would like to see four additional priorities to reflect those that have emerged from public consultation on the neighbourhood plan review.</li> </ul> <p><b>Pool of Sites</b></p> <ul style="list-style-type: none"> <li>Natural England is concerned that Site 7 contains Wootton Bassett Mud Springs SSSI designated for its fluvial geomorphology.</li> <li>Sport England is concerned that development at Sites 1 and 3 (north of town) could impede the use of adjacent playing fields</li> <li>Royal Wootton Bassett Town Council do not support: Sites 1 and 2 (north of town), 4 (land at Whitehill Lane) ,7 (south of town) and 8 (land at Woodshaw), but in principle would support Sites 3 (land at Maple Drive), 5 and 6 (south of the town).</li> </ul> <p><b>Other</b></p>

	<ul style="list-style-type: none"> <li>The Town Council do not support the brownfield target, as it is not in accordance with national policy, which requires neighbourhood areas to be given a 'housing requirement' figure. Also, target is based on historic windfall delivery and may not be possible to allocate sufficient sites.</li> </ul>
Developer/agent	<p><b>Scale of Growth</b></p> <ul style="list-style-type: none"> <li>Scale of growth was generally supported, but it was suggested that higher scales could help meet needs for infrastructure (e.g. health and education). Growth scales reflected the town's relationship with Swindon.</li> <li>The Neighbourhood Plan could be a platform to bring forward small scale brownfield land to complement Local Plan allocations.</li> </ul> <p><b>Place Shaping Priorities</b></p> <ul style="list-style-type: none"> <li>Generally considered to be the right priorities.</li> </ul> <p><b>Pool of Sites</b></p> <ul style="list-style-type: none"> <li>Sites 1, <u>2</u>, 3, 4, 5, 6, 7 and 8 have all been promoted, <del>Site 2 was not.</del></li> </ul> <p><b>Other</b></p> <ul style="list-style-type: none"> <li>Questionable whether brownfield sites are actually available and can be viably developed.</li> </ul>
General Public	<p><b>Scale of Growth</b></p> <ul style="list-style-type: none"> <li>Growth should be lower and the need for additional employment land was questioned</li> </ul> <p><b>Place Shaping Priorities</b></p> <ul style="list-style-type: none"> <li>Priorities 1 (protecting the distinct character and identity of the town, recognising its proximity to Swindon), 9 (conserving and enhancing environmental assets around Royal Wootton Bassett) and 10 (maintaining the town's elevated historical setting and central conservation area) are considered the most important.</li> <li>There needs to be a bypass to deal with the town's traffic problems.</li> <li>Investment in school and GP provision is needed</li> </ul> <p><b>Pool of Sites</b></p> <ul style="list-style-type: none"> <li>Sites to the west of the town should be avoided to preserve the historic character of the town. Concerns raised about harm to landscape in relation to the Royal Wootton Bassett escarpment and Dauntsy Vale.</li> </ul>

	<ul style="list-style-type: none"> <li>• Significant objections to Site 4 (land at Whitehill Lane). These included references to flooding, traffic problems and loss of biodiversity.</li> <li>• Sites 5,6,7 and 8 should be avoided as they are on the floodplain.</li> <li>• Site 8 could cause coalescence with Swindon.</li> <li>•</li> </ul>
Others	<p><b>Scale of Growth</b></p> <ul style="list-style-type: none"> <li>• Stagecoach consider quantum for the Swindon housing market area is suppressed, and as such fails to recognise role that Royal Wootton Bassett can play to meet the five delivery principles set out in the Emerging Spatial Strategy document. Higher growth can help support public transport infrastructure.</li> </ul> <p><b>Place Shaping Priorities</b></p> <ul style="list-style-type: none"> <li>• Wilts and Berk Canal Trust supports the safeguarding of a route and restoration of the canal as a priority.</li> </ul>

<b>Planning for Tidworth and Ludgershall (14 comments, 14 respondents)</b>	
<b>Respondent Type</b>	<b>Main Issues Raised</b>
Prescribed bodies including Town and Parish Councils	<p><b>Scale of Growth</b></p> <ul style="list-style-type: none"> <li>• Both Tidworth and Ludgershall Town Councils agree with the scale of growth, but do not support higher levels of housing.</li> <li>• They also support prioritisation of delivering employment at Castledown Business Park ahead of allocating additional employment land; and support limited retail and leisure uses on the site.</li> </ul> <p><b>Place Shaping Priorities</b></p> <ul style="list-style-type: none"> <li>• Town Councils provide general support for priorities and some rewording.</li> <li>• Ludgershall Town Council propose the incorporation of priority to address climate change, through 'greener' housing.</li> <li>• Environment Agency asks that the need to avoid impacts on River Avon SAC from new development are incorporated.</li> </ul> <p><b>Pool of Sites</b></p> <ul style="list-style-type: none"> <li>• Both Town Councils provide support for Sites 1 (Land East of Crawlboys Road), 4 (Land at Empress Way), 5 (south-west Ludgershall), 6 (Land North of Wellington Academy) and 7 (Land North of A3026).</li> <li>• Tidworth Town Council is concerned over sites around Tidworth.</li> </ul>

	<ul style="list-style-type: none"> <li>• Ludgershall Town Council believe Sites are good representation of land availability.</li> <li>• Wessex Water outline water supply requirements as a key consideration for this area, as it is subject to three separate undertakers.</li> <li>• Natural England outline landscape concerns relating to Sites 1 (Land East of Crawlboys Road), 4 (Land at Empress Way) and 5 (south-west Ludgershall).</li> <li>• Objections relating to the potential scale of residential development at Site 4 (Land at Empress Way).</li> <li>• Sport England raised concerns relating to Sites 5 (south-west Ludgershall) and 6 (Land North of Wellington Academy), which are adjacent to playing fields.</li> </ul>
Developer/agent	<p><b>Scale of Growth</b></p> <ul style="list-style-type: none"> <li>• Level of growth proposed is not justified and should take account of the extent of the functional relationship with Andover.</li> <li>• Increasing housing development will support the delivery of Castledown Business Park. The delivery of which should be prioritised ahead of making additional allocations.</li> </ul> <p><b>Place Shaping Priorities</b></p> <ul style="list-style-type: none"> <li>• Meeting 'local needs' does not reflect the area's strategic role.</li> <li>• Priorities iv and vi require the delivery of Site 4 (Land at Empress Way).</li> </ul> <p><b>Pool of Sites</b></p> <ul style="list-style-type: none"> <li>• Sites 5 (south-west Ludgershall), 6 (Land North of Wellington Academy), 7 (Land North of A3026), 8 (Land West of Pennings Road), 9 (North-west Tidworth), 10 (Land South of Bulford Road) and 11 (Land South of The Mall) are unavailable at this time.</li> <li>• Site 4 (Land at Empress Way) is actively promoted.</li> </ul>
General Public	<p><b>Scale of Growth</b></p> <ul style="list-style-type: none"> <li>• The proposed scale of growth is supported.</li> <li>• Additional employment could help overcome Ludgershall's dormitory role.</li> <li>• Castledown Business Park should be able to meet short term employment needs.</li> </ul> <p><b>Place Shaping Priorities</b></p> <ul style="list-style-type: none"> <li>• General support for the priorities as written.</li> </ul> <p><b>Pool of Sites</b></p> <ul style="list-style-type: none"> <li>• Some support for the proposed pool of sites.</li> </ul>

	<ul style="list-style-type: none"> <li>Concern that the continuation of Empress Way linking to the A342 to the east would be needed ahead of additional housing development at Site 4 (Land at Empress Way)</li> </ul> <p><b>Other</b></p> <ul style="list-style-type: none"> <li>Transport improvements are required to address local transport issues, including road, cycle and pedestrian improvements.</li> <li>Timing of delivery of a road linking Empress Way to the east of Ludgershall is a key concern.</li> </ul>
Others	<p><b>Scale of Growth</b></p> <ul style="list-style-type: none"> <li>The current or a lower quantum of housing development is accepted.</li> <li>A joint neighbourhood plan could be the appropriate vehicle for delivering brownfield sites and affordable housing.</li> <li>Prioritisation of the delivery of Castledown Business Park ahead of additional employment allocations.</li> <li>Support for start-ups/small businesses at Castledown Business Park.</li> </ul> <p><b>Place Shaping Priorities</b></p> <ul style="list-style-type: none"> <li>Support for the continuation of Empress Way, increased recreation and leisure facilities for younger people and housing to meet locally identified needs.</li> </ul> <p><b>Pool of Sites</b></p> <ul style="list-style-type: none"> <li>There was strong support for Sites 5 (south-west Ludgershall) and 7 (Land North of A3026).</li> <li>Salisbury Reds object to the further consideration of Sites 1 (Land East of Crawlboys Road), 2 (Land North of A342), 3 (Land North-East of A342) and 6 (Land North of Wellington Academy) due to distance from the existing bus network.</li> <li>Public and private rights of way, which cross the railway line will require detailed consideration during further assessments.</li> </ul> <p><b>Other</b></p> <ul style="list-style-type: none"> <li>Road improvements are required to address local transport issues, including road, cycle and pedestrian improvements.</li> <li>Timing of delivery of a road linking Empress Way to the east of Ludgershall is a key concern.</li> </ul>

**Planning for Warminster (25 comments, 24 respondents)**

Respondent Type	Main Issues Raised
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<p>Prescribed bodies including Town and Parish Councils</p>	<p><b>Scale of Growth</b></p> <ul style="list-style-type: none"> <li>• Chapmanslade Parish Council support the identification of opportunities for housing on brownfield sites.</li> </ul> <p><b>Place Shaping Priorities</b></p> <ul style="list-style-type: none"> <li>• Chapmanslade Parish Council outline a need to emphasise active travel.</li> </ul> <p><b>Pool of Sites</b></p> <ul style="list-style-type: none"> <li>• Natural England indicate that landscape and biodiversity are a concern for Site 9 (Land at New Farm).</li> <li>• Environmental Agency states that pollution prevention in relation to River Avon Special Area of Conservation (SAC) is a concern for Site 9 (Land at New Farm).</li> <li>• Environment Agency states risk of contamination of Warminster Malting Public Water Supply boreholes for Sites 5 (Land at Church Street), 6 (Land Adjacent 89 Bath Road), 7 (44 and 48 Bath Road) and 8 (Land at Brick Hill) and also, that sites are within areas where water resources and pollution prevention are a key consideration.</li> <li>• Highways England outline that due to proximity to A36, noise and air quality issues are concerns for Sites 4 (Warminster Common) and 8 (Land at Brick Hill).</li> <li>• Historic England have heritage concerns relating to Site 2 (East Warminster/East of the Dene).</li> <li>• Sport England objects to Sites 1 (North Warminster/Elm Hill) and 2 (East Warminster/East of the Dene) due to loss of playing fields.</li> </ul>
<p>Developer/agent</p>	<p><b>Scale of Growth</b></p> <ul style="list-style-type: none"> <li>• Risks identified related to a reliance on the delivery of the West Warminster Urban Extension - small/medium sites needed to diversify supply.</li> <li>• Interim Sustainability Appraisal suggests that there is capacity for additional/higher levels of growth.</li> <li>• Reliance on housing delivery through neighbourhood plans should be avoided.</li> <li>• Asks for detailed consideration of cross boundary housing needs and suggests unmet housing needs from Mendip District should be provided for.</li> </ul> <p><b>Place Shaping Priorities</b></p> <ul style="list-style-type: none"> <li>• A priority is needed to encourage the delivery of green space alongside new homes.</li> <li>• Support for incorporation of a priority for the use of sustainable materials and construction.</li> </ul> <p><b>Pool of Sites</b></p>

	<ul style="list-style-type: none"> <li>• Opportunity to maximise development at the West Warminster Urban Extension should be taken.</li> <li>• Opportunity on land excluded north of Grovelands Way, which is subject to planning permission for specialist housing for older people.</li> <li>• Sites 2 (East Warminster/East of the Dene), 5 (Land at Church Street), 8 (Land at Brick Hill) and 9 (Land at New Farm) have been actively promoted. Site 3 (Land adjacent to Fanshaw Way) is also being promoted, but as part of a larger site area.</li> <li>• Site 1 (North Warminster/Elm Hill) is not currently available for development.</li> </ul>
General Public	<p><b>Scale of Growth</b></p> <ul style="list-style-type: none"> <li>• The proposed scale of growth is accepted and should not increase.</li> <li>• Growth should be directed towards brownfield sites.</li> </ul> <p><b>Place Shaping Priorities</b></p> <ul style="list-style-type: none"> <li>• Priorities should support redevelopment in the town centre.</li> <li>• Priorities should include: need for GP surgery expansion; tree planting on new developments; flood risk; and the need to protect green space.</li> </ul> <p><b>Pool of Sites</b></p> <ul style="list-style-type: none"> <li>• Redevelopment of brownfield sites should be prioritised ahead of allocating additional greenfield land.</li> <li>• Objections raised to the further consideration of Sites 1 (North Warminster/Elm Hill), 5 (Land at Church Street) and 9 (Land at New Farm).</li> <li>• Support for further consideration of Sites 4 (Warminster Common) and 8 (Land at Brick Hill).</li> </ul>
Others	<p><b>Scale of Growth</b></p> <ul style="list-style-type: none"> <li>• Development in addition to that committed should be directed towards brownfield land/vacant land and buildings.</li> </ul> <p><b>Place Shaping Priorities</b></p> <ul style="list-style-type: none"> <li>• Priorities should support redevelopment in the town centre and other mixed-use development that could address the town's dormitory role.</li> <li>• Pedestrian, cycle and bus access should be a priority for all new developments to increase access between the town centre and edge of town developments.</li> </ul> <p><b>Pool of Sites</b></p> <ul style="list-style-type: none"> <li>• The Woodland Trust outline that Site 8 (Land at Brick Hill) is near Norridge Wood Ancient Woodland, which should be considered during further assessment.</li> </ul>

	<ul style="list-style-type: none"> <li>Allocation of additional greenfield sites should be avoided. Brownfield sites or the increase in allocation at the West Warminster Urban Extension should be prioritised.</li> </ul>
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**Planning for Westbury (39 comments, 33 respondents)**

<b>Respondent Type</b>	<b>Main Issues Raised</b>
Prescribed bodies including Town and Parish Councils	<p><b>Scale of growth</b></p> <ul style="list-style-type: none"> <li>Town Council considers that for the scale of growth to be sustainable, the following need to be addressed: <ul style="list-style-type: none"> <li>A350 congestion and air quality management</li> <li>Sustainable transport and linkages</li> <li>Town centre recovery and regeneration</li> <li>Affordable housing delivery</li> </ul> </li> <li>Some support for less housing balanced with employment growth.</li> </ul> <p><b>Place Shaping Priorities</b></p> <ul style="list-style-type: none"> <li>Town Council supports emphasis on infrastructure delivery, sustainable transport links and provision of open space.</li> <li>Town Council highlights need for bypass, railway crossing from Mane Way/ Oldfield Road and better pedestrian links.</li> <li>Town Council generally supports protection of employment areas, particularly at West Wiltshire Trading Estate but considers that former Westbury Ironworks due to its location by the station could have a more flexible approach to allow for greater diversity of uses and higher density to support economy of town.</li> <li>Town Council highlights need to protect heritage assets and landscape setting of town and improve range of facilities and services.</li> </ul> <p><b>Pool of Sites</b></p> <ul style="list-style-type: none"> <li>Town Council (with AECOM) identified those sites from the pool of sites they consider potentially suitable to progress <ul style="list-style-type: none"> <li><i>Potentially Suitable:</i> Sites 4, 7, 8, 9, 10, 12</li> <li><i>Not supported:</i> Sites 3, 5, 6</li> <li><i>Not assessed:</i> Sites 1 and 2 (outside of Westbury Neighbourhood Plan boundary), and Site 11.</li> </ul> </li> <li>Town Council (with AECOM) considered that SHELAA sites 229, 3679 should be considered, and not excluded at stage 2.</li> <li>Natural England objects to Site 6 because of unacceptable landscape impact.</li> <li>Sport England objects to Site 11 (Land at Redland Lane) unless playing fields are replaced or surplus to requirements.</li> <li>LaFarge Cement Works is identified as potential brownfield site, instead of greenfield.</li> </ul>

	<p><b>Other</b></p> <ul style="list-style-type: none"> <li>• Town Council supports brownfield target based upon previous years development; sees neighbourhood plan playing key role in delivery.</li> <li>• Town Council identify range of infrastructure alongside those identified in the consultation document.</li> <li>• Chapmanslade Parish Council highlight the impact of growth (past and present) on surrounding parishes, e.g. A3098 and Chapmanslade.</li> <li>• Westbury Leigh Primary School opposes more development to east of town, which has resulted in declining numbers for primary schools on the west.</li> <li>• Regeneration of town centre supported as priority, including improving air quality, range of shops and more housing.</li> <li>• Need for further employment questioned given existing areas and land.</li> </ul>
Developer/agent	<p><b>Scale of growth</b></p> <ul style="list-style-type: none"> <li>• Support higher level of growth at Westbury that could include additional housing required if plan period is extended.</li> <li>• Westbury is least constrained settlement in housing market area.</li> <li>• Some question how the precise figure of 1,820 homes was derived (down from TR-B growth option figure of 2,920).</li> </ul> <p><b>Place shaping priorities</b></p> <ul style="list-style-type: none"> <li>• Priority 4 needs to be addressed with a transport strategy, outlining delivery, sustainable travel and identify site-specific measures.</li> </ul> <p><b>Pool of sites</b></p> <ul style="list-style-type: none"> <li>• Further site assessment should consider the more detailed site assessments undertaken on behalf of the Town Council for the neighbourhood plan and, also include more recent confirmation of site availability.</li> <li>• Sites 1,2,3,7 and 10 are being promoted.</li> <li>• Calls for five sites that have been rejected should be re-instated.</li> <li>• New sites were promoted: southwest of Petticoat Lane, Dilton Marsh; at the former Westbury Cement Works; and Titford Farm, Westbury.</li> </ul> <p><b>Other</b></p> <ul style="list-style-type: none"> <li>• Oppose bypass because of little evidence of need. Other strategies to reduce congestion and air quality may be more appropriate e.g., enhanced rail services.</li> </ul>

	<ul style="list-style-type: none"> <li>• Unconvinced of scale of education requirements in the town - Council's evidence shows a likely 17% drop in the proportion of under 14s by 2036.</li> <li>• Support for a more flexible approach to the future of the Hawke Ridge Employment Allocation if evidence shows little prospect of delivery.</li> </ul>
General Public	<p><b>Scale of growth</b></p> <ul style="list-style-type: none"> <li>• The scale of growth is too high, without commensurate level of infrastructure investment (e.g. schools, GPs/ dentists and transport, including a bypass)</li> </ul> <p><b>Place shaping priorities</b></p> <ul style="list-style-type: none"> <li>• Priority 4 is most important - the A350 is a major problem.</li> </ul> <p><b>Pool of sites</b></p> <ul style="list-style-type: none"> <li>• Site 6 had most objections. There were also objections to Site 7 because of landscape and biodiversity concerns, and Site 11 as an existing playing field.</li> <li>• Site 10 had most support because of its proximity to existing housing/ employment developments, good transport links and opportunity to realise bridge over railway.</li> <li>• Other sites received a mixed response, or some objections (i.e. 1, 2, 3, 8 and 9).</li> </ul> <p><b>Other</b></p> <ul style="list-style-type: none"> <li>• Most prevalent concern expressed is need for A350 bypass to combat traffic congestion, poor air quality and road safety.</li> <li>• Support for other transport improvements at Oldfield Road, a bridge over the railway off Mane Way and a shuttle bus between the railway station and town centre.</li> <li>• Improve town centre - challenges include traffic problems, range of shops and pedestrian safety.</li> <li>• Support for higher brownfield target and less, if any, further greenfield development</li> <li>• Support for better housing design, lower density, more open space, carbon neutrality and adequate parking provision</li> <li>• No demand for further employment provision, with Hawke Ridge remaining unbuilt and proposed housing near railway station likely to benefit commuters</li> </ul>

## **Appendix 15**

Appendix 15 documents all verbatim representations submitted as part of the Local Plan Review consultation undertaken between 13 January and 9 March 2021.

Due to file size, this appendix has been broken down into a series of separate documents that can be viewed alongside this statement.