

## **Wiltshire Local Plan Examination**

### **Matters, Issues and Questions identified by the Inspectors**

#### **Inspectors Matters, Issues and Questions**

##### **Introduction**

Following the conclusion of the Stage 1 hearings which considered the Duty to Cooperate (DtC) this document sets out our Matters, Issues and Questions (MIQs) relating to the remaining aspects of legal compliance and soundness of the Wiltshire Local Plan (the Plan). These MIQs should be read in conjunction with the separately published guidance note for people participating in the Examination. Inspectors have already received written and oral evidence in respect of the DtC under Matter 1. As a result, it is not proposed to revisit the DtC.

Prior to the forthcoming hearing sessions, responses are invited from participants on the following MIQs raised by the Inspectors. The MIQs do not intend to cover every policy criterion in the Plan. Instead, the MIQs are based on the Main Issues relevant to these hearing sessions as identified by the Inspectors and taking account of the views of the Council and other representations.

In order to support an effective examination in respect of meeting Wiltshire's housing needs and particularly housing land supply (Matters 2 and 9) and additional to the responses to these MIQs, we request that the Council provides an update to the supporting housing permissions and completions evidence. This should include evidence up to the end of the 2024/25 financial year in order that the Inspectors have the most up to date data possible.

In addition, the updated completions and permissions information set out above should also be used to provide the examination with updated tables for the distribution of housing growth (Tables 4.2, 4.4, 4.6, 4.8, 4.10, 4.12, 4.14, 4.16) providing the latest evidence to the end of the 2024/25 financial year. The tables showing completions and commitments should be dated to start from 2023 to coincide with the calculation of the standard method for identifying housing need for the area and include the updated housing completions and permissions evidence through to 1<sup>st</sup> April 2025.

The Council should also identify whether any of the site allocations have been granted planning permission or are under construction since the Plan was submitted. We also request updated Policies Map extracts to accompany this updated data.

If this information is not available to coincide with the receipt of hearing statements, the Council should advise the Inspectors of when this will be provided.

Further information about the Examination, hearing sessions and the format for written statements is provided in the accompanying Guidance Note, and the Planning Inspectorate's Procedural Guide which should be read alongside the MIQs.

The deadlines for submitting statements in response to these MIQs is set out in the guidance note and at the end of the Stage 2 and Stage 3 MIQs sections of this document. Please note, that interested parties should only respond to questions below which are relevant to your representations on the Wiltshire Local Plan (submission version). Responses in hearing statements should also indicate whether there are any potential modifications to the policy and/or the reasoned justification that would be necessary to achieve soundness. Hearing statements are not an opportunity to introduce additional points that had not previously been raised in your representations on the Plan.

## EXAMINATION HEARINGS STAGE TWO

<b>Matter 1 - Procedural, legal and other requirements (continued)</b>
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### Issue 1

Whether the preparation of the Plan has complied with the relevant procedural, legal and other requirements.

### Questions

#### *Plan preparation*

- 1.1 Has the Plan been prepared in accordance with the Council's Statement of Community Involvement and met the minimum consultation requirements in the Town and Country Planning (Local Planning) (England) Regulations?
- 1.2 Has the preparation of the Plan been carried out in accordance with the Local Development Scheme?
- 1.3 Is the Plan sufficiently clear whether there are any policies from the existing development plan that would **not** be superseded by its adoption?

#### *Habitats Regulations Assessment*

- 1.4 How was the Habitats Regulations Assessment (HRA) carried out and was the methodology appropriate?
- 1.5 What potential impacts of the Plan were considered?
- 1.6 What were the conclusions of the HRA and how has it informed the preparation of the Plan?
- 1.7 How has the conclusion at paragraph 6.165 of the HRA that an adverse effect on water quality on the River Avon SAC, Avon Valley SPA and Ramsar site and Kennet and Lambourn Floodplain SAC cannot be ruled out been addressed in the submitted plan?
- 1.8 Have any concerns been raised regarding the HRA and if so, what is the Council's response to these? How has Natural England been involved?

#### *Sustainability Appraisal*

- 1.9 Does the Sustainability Appraisal (SA) meet the requirements for a Strategic Environmental Assessment?
- 1.10 How has the SA informed the preparation of the Plan at each stage and how were options/reasonable alternatives considered?
- 1.11 What were the conclusions of the SA and how has it informed the preparation of the Plan?
- 1.12 Are the likely environmental, social and economic effects of the Plan adequately and accurately assessed in the SA?

#### *Climate Change*

- 1.13 Does the plan accord with s19(1A) of the Planning and Compulsory Purchase Act (2004) (as amended) by including policies that are designed to secure that the development and use of the land in the area contribute to the mitigation of, and adaptation to, climate change?

## *Equality and Diversity*

- 1.14 Having regard to the Equality Impact Assessment [SD/36 and SD/36A], in what way does the Plan seek to ensure that due regard is had to the three aims expressed in Section 149 of the Equality Act 2010 in relation to those who have a relevant protected characteristic?

## *Other matters*

- 1.15 Is the submitted plan explicit as to which policies are to be regarded as 'strategic policies' as required by paragraph 21 of the National Planning Policy Framework (the Framework)?
- 1.16 Document WC1D sets out the policies from other development plan documents which the Council proposes to 'retain through the Wiltshire Local Plan review'. For soundness, should these policies be identified as 'not superseded' and remain elsewhere as part of the development plan? Is there any potential conflict between the expectations for these sites in the existing development plan documents and the submitted Plan?

## **Matter 2 - Meeting Wiltshire's Housing Needs**

### **Issue 1**

Whether the Plan has been positively prepared and whether it is justified, effective and consistent with national policy in relation to meeting housing needs.

### **Relevant Policies - 2, 3, 76, 77, 78, 79, 80, 82**

### **Questions**

#### *Housing needs overall*

- 2.1 Has the calculation of Local Housing Need (LHN) been undertaken correctly?
- 2.2 Has the correct median workplace-based affordability ratio been used to undertake the LHN calculation having regard to the date of submission of the Plan?
- 2.3 Are there any exceptional circumstances which justify an alternative approach to using the LHN standard method? If so, what are they, and what should the housing requirement be?
- 2.4 Would the submitted housing and delivery strategy policies look forward 15 years from the anticipated adoption date of the Plan? If not, what is the justification for the approach taken?
- 2.5 What is the justification for commencing the Plan period prior to the calculation date of the LHN?
- 2.6 Should the Plan period be altered? If so, what should the overall housing requirement be?
- 2.7 Is the stepped housing requirement phasing in Policy 2 justified?
- 2.8 Is the proposed identification of reserve sites justified having regard to the stepped housing requirement?

## Issue 2

Whether the Plan will deliver an appropriate mix of housing to meet the various housing needs over the Plan period and whether these are justified, effective and consistent with national policy.

### *Policy 76 - Providing affordable homes*

2.9 Is Policy 76; positively prepared, justified, effective and consistent with national policy?  
Responses should specifically address:

- a) Are the requirements for affordable housing, including proposed tenure splits, justified?
- b) Is the requirement for a minimum affordable housing percentage justified and will it be viable?
- c) Does the use of a minimum percentage of affordable housing provide sufficient certainty of when compliance with the policy would be achieved, and will it be effective?
- d) Is the proposed tenure mix justified?
- e) Does the policy's expectation that tenure will be reviewed and negotiated on a site-by-site basis to reflect the nature of the development and local needs provide sufficient certainty for decision-making and is it justified?
- f) Are the proposed modifications to Policy 76 set out in document SD/41A necessary for soundness?

### *Policy 77 - Rural exceptions sites*

2.10 Taking each of the criteria in Policy 77 in turn, are these justified and consistent with national policy?

2.11 Are the proposed modifications to Policy 77 set out in document SD/41A necessary for soundness?

### *Policy 78 - Meeting Wiltshire's housing needs*

2.12 Is Policy 78; positively prepared, justified, effective and consistent with national policy?  
Responses should specifically address:

- a) What evidence is there to support the inclusion of the Nationally Described Space Standards? Has it been subject to viability testing and what was the outcome?
- b) Is the requirement for a minimum of 7% of all housing to be built to Building Regulations M4(3) standard and all housing to be built to M4(2) standard justified? Is it viable?
- c) Is the policy sufficiently clear on the expectations for housing sizes and types required in particular parts of the area, and is the approach justified?
- d) Is the policy sufficiently clear what the Local Housing Need Assessment requires, and should this be set out within the policy?
- e) Is the policy sufficiently clear on the need for older persons accommodation and is the policy positively prepared, justified and effective as a result?
- f) What is the justification for requiring housing for vulnerable people only in the top two tiers of the settlement hierarchy, and is it supported by specific evidence?

### *Policy 79 - First Homes exception sites*

2.13 Reflecting on each criterion in turn, is Policy 79 justified, effective and consistent with national policy?

### *Policy 80 - Self and custom build housing*

2.14 Is Policy 80; positively prepared, justified, effective and consistent with national policy?  
Responses should specifically address:

- a) What is the extent of need for people in Wiltshire who wish to commission or build their own homes?
- b) Are the thresholds and percentages relating to the scale of development proposals and the serviced plots to be made available, linked to the extent of need (including the Self and Custom Build Register)? Have they been subject to viability testing?
- c) Is the approach towards the provision of custom and self-build housing, justified by specific evidence and would it be effective and consistent with national policy?

### *Policy 82 - Housing in the countryside*

2.15 Reflecting on each criterion in turn, is policy 82 justified, effective and consistent with national policy?

### *Other*

2.16 How would the Plan meet the needs of Gypsies, Travellers and Travelling Showpeople if the proposed Wiltshire Gypsy and Traveller Development Plan Document was significantly delayed or not progressed?

<b>Matter 3 - Employment, retail and other main town centre uses</b>
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### **Issue 1**

Whether the plan has been positively prepared and whether it is justified, effective and consistent with national policy in relation to employment and retail development, and other main town centre uses.

### **Relevant Policies - 64, 65, 67, 68**

### **Questions**

#### *Employment overall*

- 3.1 Is the overall amount of employment land identified in the Plan justified and supported by evidence?
- 3.2 How has the employment land evidence assessed the need for additional sites for logistics development? Is the evidence sufficiently up to date? Is it positively prepared in regard to logistics?
- 3.3 Do the Plan's strategic policies clearly articulate the overall amount of new employment land required to be identified? Does the approach taken in the submitted plan accord with paragraph 20 of the Framework? Is the plan positively prepared as a result?

- 3.4 Are the approaches to employment development (as defined in Policies 64 and 65) - justified, effective and consistent with national policy, having regard to the inclusion of Class E(g) (i-iii) and the sequential test applied to planning applications for main town centre uses?

*Retail and other main town centre uses overall*

- 3.5 Does the Plan identify any changes in the amount of floorspace for retail and other main town centre uses to be provided for in the area?
- 3.6 How does the Plan address the changes in floorspace for retail and other main town centre uses alongside the proposals for town centre opportunity sites?
- 3.7 How has the retail hierarchy been defined? Is it justified and supported by evidence?
- 3.8 Are the town centre boundaries justified? Are they based on up-to-date evidence? Will they be effective?
- 3.9 Do the submitted policies provide sufficient guidance on the 'areas of opportunity'? Are the areas of opportunity justified and will they be effective?
- 3.10 Is the Plan sufficiently clear whether any local retail floorspace would be provided within any of the site allocations?

**Issue 2**

Whether the detailed policies for employment and retail development are justified, effective and consistent with national policy

*Policy 64 - Additional employment land*

- 3.11 Is the approach to proposals for employment development on unallocated sites in Policy 64 justified and sufficiently clear in terms of whether it is appropriate to the role and function of a settlement, and how that should be assessed?
- 3.12 Are the circumstances set out in Policy 64 where employment development will be supported elsewhere, sufficiently clear to be effective?
- 3.13 Are the criteria that will be used to assess proposals for national and regional logistics development adjacent to M4 Junction 17 in Policy 64 justified?
- 3.14 Are the other requirements of development proposals in Policy 64, particularly with respect to the effects on delivery of strategic employment allocations and the local transport network - justified, effective and consistent with national policy?
- 3.15 Does the policy devolve assessment to documentation that is not part of the development plan (e.g. Department for Transport advice)?

*Policy 65 - Additional employment land*

- 3.16 Is the intention of Policy 65 that 'all land in employment use should be retained for employment purposes' justified and consistent with national policy, given that it goes on to set out specific circumstances where employment land may be lost?
- 3.17 Are the specific circumstances set out in Policy 65 where loss of employment land may be accepted, justified and effective with respect to the evidence required to demonstrate:
- a) that the site is no longer suited for current or future business needs?
  - b) that the site has been unsuccessfully marketed?

- 3.18 Taking each of the other criteria in turn, is Policy 65 justified and consistent with national policy?
- 3.19 Are there any requirements set out in the reasoned justification which are not reflected in the policy wording?

*Policy 67 - Sequential test and retail impact assessment*

- 3.20 Is Policy 67 sufficiently clear in terms of whether or not the requirement of a sequential test for main town centre uses would apply to development proposals for uses that also fall within the definition of 'employment development' for the purposes of other parts of the Plan?
- 3.21 Is the threshold for requiring applicants to prepare a retail impact assessment justified and supported by evidence?
- 3.22 Is the wording of Policy 67 sufficiently clear in terms of how proposals will be assessed in relation to maintaining and enhancing the vitality and viability of a town centre?

*Policy 68 - Managing Town centres*

- 3.23 Is Policy 68 a strategic policy?
- 3.24 Is the approach to uses within Class E of the Use Classes Order consistent with the provisions of that Order in relation to changes within the use class?
- 3.25 Is the approach in Primary Shopping areas where works do not require planning permission consistent with the Framework? Would it conflict with the Use Classes Order in respect of active frontages? Is this approach justified and supported by evidence?
- 3.26 Does Policy 68 devolve the detail for decision-making in relation to 'the kinds of uses that are accepted within different areas of the town centre' to strategies whose requirements are not included within Plan policies?
- 3.27 Are there any requirements for development set out in the reasoned justification to Policy 68 which are not reflected in the policy wording?

<b>Matter 4 - The Spatial Strategy and the distribution of development</b>
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**Issue**

Whether the Spatial Strategy and the distribution of development are justified.

**Relevant policies – Policies 1, 2, 3, 5, 6, 9, 21, 22, 39**

**Questions**

*Spatial Strategy overall*

- 4.1 Is the spatial distribution of development across the borough justified and what factors influenced the Spatial Strategy, for example physical and environmental constraints, effects on the highway network, the capacity of infrastructure to accommodate the proposed amount development?
- 4.2 What alternative options for the spatial strategy were considered?

- 4.3 Why was the submitted approach chosen and is it an appropriate strategy having regard to reasonable alternatives?
- 4.4 What effect would the proposed spatial strategy have on the objectives of National Landscapes in the Plan area?
- 4.5 Does the Plan propose any new development within the Green Belt? If so, do exceptional circumstances exist to justify the release of land from the Green Belt?
- 4.6 Are the Plan's strategic policies sufficiently clear about the overall amount of new housing and employment development envisaged in each settlement/ Housing Market area?
- 4.7 Do the Plan's strategic policies set out a clear strategy for the identification of strategic economic growth in Wiltshire?
- 4.8 Is the Plan sufficiently clear how the requirements for strategic logistics and distribution will be addressed? Is the plan positively prepared as a result?
- 4.9 Does the submitted Plan's approach strike an appropriate balance between the identification of land for new homes and employment?
- 4.10 Is the settlement strategy set out in Policy 1 justified?
- 4.11 Taking the first three bullet points of Policy 2 in turn, are they justified? Will they be effective?
- 4.12 Is the proposed area of search for the Salisbury Area new community justified? Does Policy 21 provide sufficient specificity to guide the location of the proposed new settlement? Will it be effective? Is the reliance on contributions to housing within the Plan period from the proposed new settlement justified?
- 4.13 If the need for new homes from the proposed new settlement to contribute to housing delivery by 2038 is identified in the Plan's evidence base, why is establishing the need for the new settlement devolved to a future plan review?
- 4.14 Having regard to paragraph 22 of the Framework, should the Spatial Strategy look beyond 15 years post-adoption of the plan having regard to the larger scale growth proposed by the new settlement?
- 4.15 Is the overall approach to reserve sites justified? Will it be effective? Taking each of the requirements in turn, are bullets 1-3 of Policy 3 justified?
- 4.16 Is the approach to broad locations for future growth justified? What is intended by the requirement in Policy 3 for the identification of additional urban extensions in subsequent development plan documents?
- 4.17 Are the broad locations sufficiently clear? Are they identified on the key diagram/ policies map? Is the approach consistent with paragraph 23 of the Framework? Will it be effective?
- 4.18 Does the plan clearly set out the requirements for infrastructure including, transport, telecommunications, security, water supply, wastewater, flood risk, health, education and cultural infrastructure and energy as required by paragraph 20 of the Framework?
- 4.19 What are the likely impacts of the proposed scale and distribution of development on existing infrastructure?
- 4.20 Is there evidence of identified needs in terms of locational gaps and capacity issues relating to existing infrastructure that should be addressed in the Plan?
- 4.21 Which improvements to infrastructure are required and will they be critical to the delivery of the spatial strategy and how will they be brought forward and funded?



- 4.22 Is there any evidence of a need to include any additional infrastructure projects in the Plan?
- 4.23 Should the specific infrastructure projects that are required to support residential and other forms of development during the Plan period in Principal Settlements and Market Towns be identified in relevant policies?
- 4.24 Are the contributions expected from development proposals towards specific infrastructure projects sufficiently clear?
- 4.25 Is the Council's viability evidence proportionate and up-to-date having regard to relevant national policy and guidance, and has it taken full account of and influenced the policy requirements of the Plan?
- 4.26 Is there any clear evidence that the policy requirements of the Plan would affect the viability or deliverability of proposed site allocations or that any further changes are required to achieve soundness in those respects?
- 4.27 Does the viability assessment provide sufficient granularity when considering the effects of the Plan's policies on the development of sites of 6-49 dwellings?
- 4.28 Does the reasoned justification at paragraph 3.65 of Policy 5 include requirements for development to adhere to, which should be within the policy text?
- 4.29 Is the Plan's reliance on Neighbourhood Plans to bring forward sites in Large Villages and Local Service Centres, together with some sites in Principal Settlements and Market Towns, justified?
- 4.30 What provisions does the Plan make if Neighbourhood Plans do not allocate new residential sites as envisaged?
- 4.31 Do the Neighbourhood Area figures relate to designated Neighbourhood Areas or individual settlements?
- 4.32 How were each of the Neighbourhood Area designation housing requirements calculated? Are they justified?

#### *Strategy for the Chippenham Housing Market Area*

- 4.33 Is the strategy for the Chippenham Principal Settlement justified and capable of being delivered through a combination of existing allocations, small sites and other sources of supply as identified in Policy 6?
- 4.34 Why was a single large new allocation chosen as the preferred approach? What alternative options were considered and why were these rejected?
- 4.35 Is the requirement for the link to the A4 to the A350 justified? Are any site allocations dependent upon its completion/ implementation?
- 4.36 Is the proposed Chippenham Broad Location sufficiently clear in terms of its scale, timing and location? Is it justified?
- 4.37 Are the Principal Employment Areas identified in Chippenham by Policy 6 (Bumpers Farm Industrial Estate, Methuen Park and Parsonage Way Industrial Estate) justified?
- 4.38 Overall is the amount of employment land to be allocated at Chippenham justified?
- 4.39 Are policies CH1 and CH2 relating to existing plan allocations at Chippenham intended to be saved? If so, where is this set out in the submitted plan?

- 4.40 Does Policy 6 reflect the range of necessary infrastructure requirements as identified in the Infrastructure Delivery Plan (IDP)?
- 4.41 Overall, is the amount of new housing and employment development to be allocated at Calne Market Town justified and capable of being delivered through a combination of existing allocations, small sites and other sources of supply as identified in Policy 9?
- 4.42 Is the Principal Employment Area identified in Calne by Policy 9 (Porte Marsh Industrial Estate) justified?
- 4.43 Overall, is the amount of new housing and employment development to be allocated at Corsham Market Town justified and capable of being delivered through a combination of existing allocations, small sites and other sources of supply as identified in Policy 12?
- 4.44 Is the approach to the reserve site in Corsham (Land East of Leafield Trading Estate) clear, and is it justified and effective in terms of policy expectations in Policy 12 for any site-specific matters?
- 4.45 Are the Principal Employment Areas identified in Corsham by Policy 12 (Leafield Industrial Estate, and Five Ways Trading Estate) justified?
- 4.46 Overall, is the amount of new housing and employment development to be allocated at Devizes Market Town justified and capable of being delivered through a combination of existing allocations, small sites and other sources of supply as identified in Policy 14?
- 4.47 Are the Principal Employment Areas identified in Devizes by Policy 14 (Banda Trading Estate, Folly Road, Hopton Industrial Estate, Hopton Park, Le Marchant Barracks, Mill Road, Nursteed Industrial Estate and Police Headquarters) justified?
- 4.48 Overall, is the amount of new housing and employment development to be allocated at Malmesbury Market Town justified and capable of being delivered through a combination of existing allocations, small sites and other sources of supply as identified in Policy 16?
- 4.49 Would the reserve site 'Land off Park Lane and Sherston Close' have any effect on the setting of the National Landscape, and is the reserve site otherwise justified?
- 4.50 Are the Principal Employment Areas identified in Malmesbury by Policy 16 (Malmesbury Business Park, Dyson Site and Land North of Tetbury Hill) justified?
- 4.51 Overall, is the amount of new housing and employment development to be allocated at Melksham Market Town justified and capable of being delivered through a combination of existing allocations, small sites and other sources of supply as identified in Policy 17?
- 4.52 Where would the proposed Melksham Broad Location be sited? When would it be required and is it justified?
- 4.53 What is the status of the proposed bypass to the east of Melksham? What evidence is there to support its inclusion within the submitted plan? Is the proposed new housing contingent upon its construction and operation? Is it justified? Would it be viable? Is there a reasonable prospect that it would be built within the Plan period?
- 4.54 Are the Principal Employment Areas identified in Melksham by Policy 17 (Bowerhill Industrial Estate, Hampton Business Park, Avonside Enterprise Park, Intercity Industrial Estate, Upside Business Park, Challemead Business Park and Bradford Road Employment Area) justified?
- 4.55 Why is the indicative bypass corridor route shown on the concept plans, but not on the Policies Map?
- 4.56 Does the Policy 17 fully reflect the identified requirements for infrastructure improvements?

### *Strategy for the Salisbury Housing Market Area*

- 4.57 Overall, is the amount of new housing and employment development to be allocated at the Salisbury Principal Settlement justified and capable of being delivered through a combination of existing allocations, small sites and other sources of supply as identified in Policy 22?
- 4.58 Are the Principal Employment Areas identified in Salisbury by Policy 22 (Old Sarum, Southampton Road and Churchfields Employment Area) justified?
- 4.59 Is there sufficient evidence to justify that the proposed level of growth in Salisbury would maintain the safety and function of the strategic road network and the surrounding local highway network throughout the Plan period?
- 4.60 Does Policy 22 reflect the identified requirements for infrastructure improvements and the relationship with heritage assets and the surrounding landscape?
- 4.61 Overall, is the amount of new housing and employment development to be allocated at Amesbury Market Town justified and capable of being delivered through a combination of existing allocations, small sites and other sources of supply as identified in Policy 36?
- 4.62 Are the Principal Employment Areas identified in Amesbury by Policy 36 (Solstice Park, London Road, Porton Down and High Post) justified when taking account of the employment land review?
- 4.63 Is there sufficient evidence to justify that the proposed level of growth in Amesbury would maintain the safety and function of the strategic road network and the surrounding local highway network throughout the Plan period?
- 4.64 Does Policy 36 reflect the identified requirements for infrastructure improvements and the relationship with heritage assets, including World Heritage Sites?
- 4.65 Overall, is the amount of new housing and employment development to be allocated at Tidworth and Ludgershall Market Town justified and capable of being delivered through a combination of existing allocations, small sites and other sources of supply as identified in Policy 39?
- 4.66 Does Policy 39 appropriately reflect Ludgershall's status as a settlement in the Salisbury Housing Market Area, insofar as it is not listed as a constrained settlement in the Plan?
- 4.67 Is the Principal Employment Area identified in Policy 39 (Castledown Business Park) justified?
- 4.68 Is there sufficient evidence to justify that the proposed level of growth in Tidworth and Ludgershall would maintain the safety and function of the strategic road network and the surrounding local highway network throughout the Plan period?

### *Strategy for the Swindon Housing Market Area*

- 4.69 Overall, is the amount of new housing and employment development to be allocated at Marlborough Market Town justified and capable of being delivered through a combination of existing allocations, small sites and other sources of supply as identified in Policy 44?
- 4.70 Are the Principal Employment Areas identified in Marlborough by Policy 44 (Marlborough Business Park, Pelham Court Site and Wagon Yard) justified?
- 4.71 Is there sufficient evidence to justify that the proposed level of growth in Marlborough would maintain the safety and function of the strategic road network and the surrounding local highway network throughout the Plan period?

- 4.72 Overall, is the amount of new housing and employment development to be allocated at Royal Wootton Bassett Market Town justified and capable of being delivered through a combination of existing allocations, small sites and other sources of supply as identified in Policy 47?
- 4.73 Evidence in document CD/41A indicates that the housing requirement in Policy 47 as submitted for Royal Wootton Bassett Market Town may be incorrect. Taking account of the most up-to-date evidence available, what should the housing requirement be?
- 4.74 Are the Principal Employment Areas identified in Royal Wootton Bassett by Policy 47 (Whitehill Industrial Estate, Interface Industrial Estate and Coped Hall Business Park) justified?
- 4.75 Is there sufficient evidence to justify that the proposed level of growth in Royal Wootton Bassett would maintain the safety and function of Junction 16 of the M4 and the surrounding road network throughout the Plan period?
- 4.76 Does the Policy 47 reflect the identified requirements for infrastructure improvements and the relationship with heritage assets?

#### *Strategy for the Trowbridge Housing Market Area*

- 4.77 Overall, is the amount of new housing and employment development to be allocated at Trowbridge Principal Settlement justified and capable of being delivered through a combination of existing allocations, small sites and other sources of supply as identified in Policy 52?
- 4.78 Are the Principal Employment Areas identified in Trowbridge by Policy 52 (Canal Road Industrial Estate, White Horse Business Park, West Ashton Road, Bryer Ash Business Park and Bradford Road) justified?
- 4.79 Is the Trowbridge Broad Location for further housing and employment development and co-ordinated delivery of infrastructure justified and sufficiently clear in terms of its scale, timing and location?
- 4.80 Is there sufficient evidence to justify that the proposed level of growth in Trowbridge would maintain the safety and function of the A361, A363, A366, B3105 and the surrounding road network throughout the Plan period?
- 4.81 Are the expectations of Policy 52 seeking to balance additional growth in Trowbridge with respecting the individual identities of nearby villages, sufficiently clear to be evident how a decision maker should react to development proposals?
- 4.82 Does Policy 52 appropriately reflect the identified requirements for infrastructure improvements and the relationship with heritage assets and the Bath and Bradford on Avon Bats Special Area of Conservation?
- 4.83 Overall, is the amount of new housing and employment development to be allocated at Bradford on Avon Market Town justified and capable of being delivered through a combination of existing allocations, small sites and other sources of supply as identified in Policy 57?
- 4.84 Is the approach to the reserve site in Bradford on Avon (Land at the Former Golf Course) clear, and is it justified and effective in terms of policy expectations in Policy 57 for any site-specific matters?
- 4.85 Are the Principal Employment Areas identified in Bradford on Avon (Treenwood Industrial Estate and Elm Cross Trading Estate) justified?
- 4.86 Is there sufficient evidence to justify that the proposed level of growth in Bradford on Avon would maintain the safety and function of the local road network throughout the Plan period?

- 4.87 Does Policy 57 have sufficient regard to the relationship of development proposals with the Bath and Bradford on Avon Bats Special Area of Conservation?
- 4.88 Overall, is the amount of new housing and employment development to be allocated at Warminster Market Town justified and capable of being delivered through a combination of existing allocations, small sites and other sources of supply as identified in Policy 58?
- 4.89 Are the Principal Employment Areas identified in Warminster (Crusader Park, Warminster Business Park, Woodcock Road Industrial Estate and Northlands Industrial Estate) justified?
- 4.90 Is there sufficient evidence to justify that the proposed level of growth in Warminster would maintain the safety and function of the local road network, including the A36, throughout the Plan period?
- 4.91 Are the detailed expectations of Policy 58, including the extent of main town centre uses to be permitted, the infrastructure requirements required to support future development proposals and the relationships with the River Avon Special Area of Conservation and the Bore Hill Farm biodigester, sufficiently clear to be effective?
- 4.92 Overall, is the amount of new housing and employment development to be allocated at Westbury Market Town justified and capable of being delivered through a combination of existing allocations, small sites and other sources of supply as identified in Policy 60?
- 4.93 Are the Principal Employment Areas identified in Westbury (West Wiltshire Trading Estate, Brook Lane Trading Estate and North Acre Industrial Estate) justified?
- 4.94 Is there sufficient evidence to justify that the proposed level of growth in Westbury would maintain the safety and function of the local road network, including the A350 and A36, throughout the Plan period?
- 4.95 Are the expectations of Policy 60 in terms of the relationships with the surrounding landscape, including the nearby National Landscape, sufficiently clear to be effective?

#### *Rural Areas*

- 4.96 Is the strategy for the rural areas and the associated distributions of housing growth to Local Service Centres, Large Villages, and Small Villages justified?
- 4.97 Is the identification of Principal Employment Areas in rural areas – Fiveways Trading Estate in Rudloe; Marlborough Road, Pewsey; Salisbury Road Business Park, Pewsey; Manor Farm, Manningford Bruce; Hirata Site, Burbage; Porton Down; Downton Business Centre; and High Post, justified?
- 4.98 The Council have proposed in CD/41A to delete Broomcroft Road, Pewsey from the list of Principal Employment Areas as it is not considered to be available for employment uses following its recent redevelopment for housing. Would the deletion of the proposed allocation have any implications for the deliverability of employment growth in the Plan?

## **Matter 5 - Delivering the spatial objectives**

### **Issue**

Whether the detailed development policies for delivering the spatial objectives of the Plan are justified, effective and consistent with national policy.

### **Relevant Policies – 66, 69, 70, 71, 72, 73, 74, 75**

### **Questions**

#### *Policy 66 - Military establishments*

- 5.1 Is Policy 66; positively prepared, justified, effective and consistent with national policy?  
Responses should specifically address:
- a) Is the requirement that it is well related to an existing settlement in location and scale justified and effective?
  - b) Should it address other issues such as accessibility to local services?
  - c) Does it adequately reflect the purposes of national landscapes when considering the reuse of military establishments outside the designated settlement boundaries?
  - d) Does it provide sufficient guidance where redundant military establishments may not be suitable for redevelopment for employment uses?

#### *Policy 69 - Tourism*

- 5.2 Is Policy 69; positively prepared, justified, effective and consistent with national policy?  
Responses should specifically address:
- a) Whether it provides sufficient flexibility for tourist proposals which may not be located in or close to locations in the settlement hierarchy?
  - b) Whether it is consistent with national policy in terms of the approaches to the historic environment, valued landscapes and light, noise and odours.

#### *Policy 70 - Sustainable Transport*

- 5.3 Is Policy 70; positively prepared, justified, effective and consistent with national policy?  
Responses should specifically address:
- a) Is it a strategic policy?
  - b) Are the listed requirements sufficiently clear to be effective for the purpose of decision taking, and consistent with national policy?
  - c) Does the policy approach accord with the settlement hierarchy?
  - d) Is the Plan, including Policy 70, sufficiently clear about the relationship between the transport strategies for the Principal Settlements and Market Towns and the Infrastructure Delivery Plan?

#### *Policy 71 - Transport and New Development*

- 5.4 Is Policy 71; positively prepared, justified, effective and consistent with national policy?  
Responses should specifically address:

- a) Is it consistent with the tests set out at paragraph 57 of the Framework where planning obligations are sought to mitigate the effects of development proposals?
- b) Are the relevant considerations identified otherwise justified, effective and consistent with national policy?
- c) Is the policy sufficiently clear to be justified and effective in terms of the circumstances when travel plans will be required from development proposals?
- d) Is the policy and the reasoned justification at paragraph 5.41 clear whether there are any local policies relating to Electric Vehicle charging which may be introduced?

*Policy 72 - Development impacts on the primary and major road networks*

5.5 Is Policy 72; positively prepared, justified, effective and consistent with national policy?  
Responses should specifically address:

- a) Does the policy apply to the Strategic Road Network (SRN) and if so, is it clear as to how any proposals which affect the SRN will be considered?
- b) If the reasoned justification at paragraph 5.42 is justified, should it be included in the policy wording?

*Policy 73 - Transport: Demand management*

5.6 Is Policy 73; positively prepared, justified, effective and consistent with national policy?  
Responses should specifically address:

- a) Is it a strategic policy?
- b) Is it sufficiently clear what types of development and of what scale it will apply to?
- c) How will the policy be implemented in respect to car park management and will it be effective?
- d) Is it justified to defer its implementation by referring to other documents that are not part of the development plan (e.g. The Local Transport Plan, LTP parking strategy, Local Cycling and Walking Infrastructure plans and LTP smarter choices strategy)?

*Policy 74 - Movement of goods*

5.7 Is Policy 74; positively prepared, justified, effective and consistent with national policy?  
Responses should specifically address:

- a) Whether it is a strategic policy?
- b) Is it consistent with the spatial strategy?
- c) Whether it is coterminous with the Plan's employment land allocations (including that Boscombe Down is accessed from a non-strategic A class road)?
- d) How will it safeguard land for rail freight interchanges and is that approach sound?
- e) Are the restrictions on lorry routes and requirements relating to freight movements and sustainable last mile delivery options positively prepared, how will they be implemented, and should they include clear thresholds for decision-making?

*Policy 75 - Strategic Transport Network*

5.8 Is Policy 75; positively prepared, justified, effective and consistent with national policy?

Responses should specifically address:

- a) Whether it is a strategic policy?
- b) Is the land identified for the station improvements listed in criteria 4a) to e) identified in the Plan and are they shown on the policies map?
- c) Are any improvements to, or development proposals for the listed railway stations identified in evidence base, and are they included in the Infrastructure Delivery Plan?

**DEADLINE FOR SUBMISSION OF HEARING STATEMENTS FOR EXAMINATION STAGE TWO  
HEARINGS (MATTERS 1 to 5) - 5PM ON MONDAY 20 OCTOBER 2025**



## EXAMINATION HEARINGS STAGE THREE

### Matter 6 - The approach to Site Allocations

#### Issue

*Whether the approach to the site allocations is justified, effective and consistent with national policy.*

#### Questions

- 6.1 Is the site selection methodology justified? Is it appropriate?
- 6.2 How has the site selection methodology reflected the findings of the Heritage Impact Assessment (HIA)?
- 6.3 What approach was used in the identification of the reserve sites? Is it justified?
- 6.4 How have the site allocations been informed by the Strategic Flood Risk Assessment (SFRA)?
- 6.5 Having regard to the risk of flooding, has each of the site allocations passed the sequential approach to site selection? Is this clearly set out in evidence?
- 6.6 What effect has the stage 2 SFRA had on the site allocations, the accompanying policies and concept plans?
- 6.7 Is the Plan sufficiently clear on the measures that development of site allocations in Bradford on Avon, Calne, Devizes, Laverstock, Marlborough, Salisbury and Westbury are required to contribute to in relation to mitigating impacts on designated Air Quality Management Areas (AQMA's) and how those contributions will be calculated?
- 6.8 Can the site allocations in the Salisbury and Marlborough areas achieve nutrient neutrality? How is it envisaged this will be achieved?
- 6.9 What evidence is there to demonstrate that there is sufficient capacity in the local highway network to support the proposed site allocations?
- 6.10 What evidence is there to support the anticipated housing delivery rate for each residential site allocation?
- 6.11 Are the intended funding contributions to infrastructure as set out in the individual site allocation policies sufficiently clear to be effective, justified and consistent with national policy in terms of how the contributions would be calculated?
- 6.12 Is it justified that some site allocations in the Plan (Policies 7, 11, 18, 20, 23, 26, 27, 40, 48, 49, 51, 53, 55, 61 and 62) require that a single comprehensive masterplan, phasing and delivery strategy be prepared and approved by the local planning authority in advance of any planning application - and would such an approach conflict with other legislation?
- 6.13 For effectiveness, should Policies 6, 9, 12, 14, 16, 17, 22, 36, 39, 44, 47, 52, 57, 58 and 60 be modified to ensure that it is evident how a decision maker should react to development proposals, including within site allocations, in each of those areas?
- 6.14 Are the approaches to mitigation requirements required for site allocations, including with respect to biodiversity, protected species and hedgerows/trees, justified and consistent with national policy?
- 6.15 Do the policies of the Plan adequately make clear the infrastructure requirements for each of the allocated sites and the timing of provision of such infrastructure?

## Questions

### *Chippenham Area Site Allocations*

#### **Relevant Policies - 7, 8, 10, 11, 13, 15, 18, 19, 20**

#### *Policy 7 - Land South of Chippenham and east of Showell Farm*

- 6.16 Is Policy 7 relating to the site allocation; positively prepared, justified, effective and consistent with national policy? Responses should specifically address:
- a) What is the current planning status of the site?
  - b) How has the site area been defined?
  - c) Is there sufficient evidence that the full site can be comprehensively developed?
  - d) Is Policy 7 sufficiently clear on the overall scale of development that is proposed to be allocated?
  - e) Is the Plan sufficiently clear on what the full capacity of the proposed allocation within the red line boundary would be?
  - f) Is the Plan sufficiently clear as to what proportion of the allocation is likely to come forward beyond the submission Plan period?
  - g) Are there any consequential effects for the policy or concept plan as a result of the level 2 SFRA?
  - h) Are the land area requirements for the range of uses required to be provided within the allocation sufficiently clear? Are they justified?
  - i) Will the policy be effective in guiding subsequent planning applications/ reserved matters applications?
  - j) Would the allocation have any potential significant impacts on designated heritage assets?
  - k) Is the new road corridor between the A4 and A340 justified? When would it be required and what effect would it have on the phasing of new residential and employment development?
  - l) Does the link road require funding from development beyond the Plan period? Overall, is the proposed road link viable? Is it deliverable within the plan period?
  - m) Is the approach to green and blue infrastructure and dark corridors along the River Avon justified and consistent with national policy, including having regard to the recommendations of the Habitats Regulation Assessment?
  - n) Is there any inconsistency between the boundary of the site within the Plan and the Policies Map?
  - o) What effects would the proposed change to the concept plan (fig 4.2) shown in SD/41A and the consequential changes to the Policies Map have on the allocation?
  - p) Are the other changes to Policy 7 as set out in SD/41A justified and necessary for soundness?

*Policy 8 - Chippenham town centre*

6.17 Is Policy 8; positively prepared, justified, effective and consistent with national policy?  
Responses should specifically address:

- a) Whether it is sufficiently clear as to the amount of residential development, floorspace of new/expanded retail, commercial and other uses proposed?
- b) Has the sequential test been passed having regard to the proposed residential use at Bath Road and Emery Gate shopping centre sites?
- c) What are the conclusions of the level 2 SFRA for the sites?
- d) Overall, would the site be viable?

*Policy 10 - Land off Spitfire Road, Calne*

6.18 Is Policy 10 relating to the site allocation; positively prepared, justified, effective and consistent with national policy? Responses should specifically address:

- a) Whether the proposed allocation should be clearer in terms of the employment uses that will be permitted and are the associated requirements effective?
- b) Would the proposed allocation have any effect on the setting of the National Landscape?

*Policy 11 - Land to the north of Spitfire Road, Calne*

6.19 Is Policy 11 relating to the site allocation; positively prepared, justified, effective and consistent with national policy? Responses should specifically address:

- a) What is the current planning status of the site?
- b) Would the site have any effect on the National Landscape or its setting?
- c) Is the policy sufficiently clear as to land requirements for provision of public open space?
- d) Is the area shown on the concept plan for plots for custom and self-build dwellings on the site justified? Is this intended to be a development requirement and therefore should it be specifically identified within the policy text for effectiveness?

*Policy 13 - Land south of Dicketts Road, Corsham*

6.20 Is Policy 13 relating to the site allocation; positively prepared, justified, effective and consistent with national policy? Responses should specifically address:

- a) How has the boundary of the proposed allocation and the site size been defined?
- b) Does the allocation boundary accord with the concept plan boundary?
- c) How would a development boundary with the Neighbourhood Plan green buffer be intended to be achieved and should this be made clear in the policy?
- d) Is there a local deficit of provision of allotments in Corsham to justify the requirement for provision and should the policy be more specific in terms of the quantity required from the development?
- e) Has the presence of existing easements within the site and the potential need for additional water infrastructure been considered when calculating the indicative capacity of the allocation?
- f) Are any changes required to the approach to drainage for effectiveness?

*Policy 15 - Land at Devizes Wharf, Assize Court and Wadworth Brewery, Devizes*

6.21 Is Policy 15 relating to the site allocation; positively prepared, justified, effective and consistent with national policy? Responses should specifically address:

- a) Having regard to document SD/73, what is the current planning status of each of the three component parts of the site allocation?
- b) Is the requirement for the three main parcels to be developed in combination justified?
- c) What effects would the proposed policy have on designated heritage assets and is the policy consistent with the Framework in respect of the conservation of designated heritage assets or their setting?
- d) Does the policy provide sufficient clarity on the amount of different uses that would be acceptable on the sites and is there sufficient specificity to guide decision-makers?
- e) Does the policy devolve criteria or guidance that may be used for decision-making to the 'New Masterplanning Devizes Wharf Redevelopment Feasibility Update' which is not part of the development plan?
- f) Are the requirements for contributions towards measures in the Devizes Transport Strategy and secondary and early years justified having regard to d) above, and how would they be calculated?
- g) Is the approach to the protection of the canal and its use, including retention of all hedgerows and trees along with a wide buffer and ecological protection zone, justified and consistent with national policy?

*Policy 18 - Land east of Melksham*

6.22 Is Policy 18 relating to the site allocation; positively prepared, justified, effective and consistent with national policy? Responses should specifically address:

- a) What is the current planning status of the site?
- b) Is the 5ha of employment land and the requirement for land for a 2 form entry primary school, justified?
- c) Would the proposal affect any designated heritage assets or their setting?

*Policy 19 - Land off Bath Road, Melksham*

6.23 Is Policy 19 relating to the site allocation; positively prepared, justified, effective and consistent with national policy? Responses should specifically address:

- a) What is the current planning status of the site?
- b) Is the site allocation justified in terms of the apportionment of approximately 135 dwellings and 2ha of land for the expansion of Melksham Oak Academy/Community School?

*Policy 20 - Land north of the A3102, Melksham*

6.24 Is Policy 20 relating to the site allocation; positively prepared, justified, effective and consistent with national policy? Responses should specifically address:

- a) What is the current planning status of the site?
- b) Is the site allocation justified in terms of the apportionment of approximately 285 dwellings and 0.4ha of land for a 100-place nursery?

## Questions

### *Salisbury Area Housing Allocations*

**Relevant Policies - 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 37, 38, 40, 41, 42, 43**

#### *Policy 23 - Land north east of Old Sarum, Salisbury*

6.25 Is Policy 23 relating to the site allocation; positively prepared, justified, effective and consistent with national policy? Responses should specifically address:

- a) What is the current planning status of the site?
- b) What effect would the allocation have on designated heritage assets?
- c) Is there evidence that any harm to designated heritage assets can be avoided even after mitigation?
- d) What evidence is there that the allocation can be developed as envisaged having regard to the extent of likely archaeological remains on site?
- e) Does the concept plan at figure 4.16 reflect the Heritage Impact Assessment?
- f) Is there a local deficit of allotments to justify the requirement for provision and should the policy be more specific in terms of the quantity required from the development?

#### *Policy 24 - Land at Netherhampton Road Garden Centre*

6.26 Is the site still available for development?

6.27 If not, are modifications necessary to delete the site from the plan?

#### *Policy 25 - Land north of Beehive Park and Ride*

6.28 Is Policy 25 relating to the site allocation; positively prepared, justified, effective and consistent with national policy? Responses should specifically address:

- a) What effect would the allocation have on designated heritage assets?
- b) Having regard to the Heritage Impact Assessment findings, is there evidence that any harm to designated heritage assets can be avoided even after mitigation?
- c) Is there a local deficit of provision of allotments to justify the requirement for provision and should the policy be more specific in terms of the quantity required from the development?
- d) Is the requirement for a strategy of mitigation relating to a Source Protection Zone 1 and Drinking Water Safeguard Zone justified as a site-specific issue in this particular location?
- e) Is the allocation sufficiently clear in terms of whether site specific measures are required as part of a future development to neutralise levels of phosphates flowing into the River Avon Special Area of Conservation?

#### *Policy 26 - Land north of Downton Road, Salisbury*

6.29 Is Policy 26 relating to the site allocation; positively prepared, justified, effective and consistent with national policy? Responses should specifically address:

- a) Would the allocation result in any adverse effects on the visibility of Salisbury Cathedral and if so, is there evidence that any effects could be adequately mitigated?

- b) Would the site be at risk of flooding and if so, should such matters be addressed in the policy?
- c) Would the development of the proposed allocation have any effect on the adjacent Site of Special Scientific Interest?
- d) Would the allocation have any effect on the local highway network?
- e) Is there a local deficit of provision for children's play areas and allotments to justify the requirement for provision and should the policy be more specific in terms of the quantity required from the development?
- f) Is the allocation sufficiently clear in terms of whether site specific measures are required as part of a future development to neutralise levels of phosphates flowing into the River Avon Special Area of Conservation?

*Policy 27 - Land south of Harnham, Salisbury*

6.30 Is Policy 27 relating to the site allocation; positively prepared, justified, effective and consistent with national policy? Responses should specifically address:

- a) What effect would the allocation have on designated heritage assets? Is there evidence that any harm to designated heritage assets can be avoided even after mitigation?
- b) Is there any conflict between the findings of the Heritage Impact Assessment and the concept plan for the site?
- c) Would the site have any effect on the setting of the nearby National Landscape?
- d) Is there a local deficit of provision of allotments to justify the requirement for provision and should the policy be more specific in terms of the quantity required from the development?
- e) Is the allocation sufficiently clear in terms of whether site specific measures are required as part of a future development to neutralise levels of phosphates flowing into the River Avon Special Area of Conservation?

*Policy 28 - Land west of Coombe Road, Salisbury*

6.31 Is Policy 28 relating to the site allocation; positively prepared, justified, effective and consistent with national policy? Responses should specifically address:

- a) Whether the Plan is sufficiently clear on any interrelationships between the sites allocated by Policies 27 and 28, such as site access?
- b) How would this be coordinated?
- c) When taking account of the scale of the proposed allocation, are the expectations of the provision of children's play areas and allotments justified?

*Policy 29 - Suitable Alternative Natural Greenspace, South Salisbury*

6.32 Is Policy 29 relating to the site allocation; positively prepared, justified, effective and consistent with national policy? Responses should specifically address:

- a) How will the Suitable Alternative Natural Greenspace (SANG) be provided and when is it likely to be delivered?
- b) Is the SANG required for the lifetime of the development or in perpetuity?
- c) Is Policy 29 sufficiently clear on the trigger for the implementation of the SANG?

- d) Is the policy sufficiently clear how the SANG would be managed and maintained?
- e) How will the effectiveness of the SANG be monitored?

*Policy 30 - Land east of Church Road, Laverstock*

- 6.33 Is Policy 30 relating to the site allocation; positively prepared, justified, effective and consistent with national policy? Responses should specifically address:
- a) Are the requirements justified having regard to the scale of the proposed allocation?
  - b) Does the proposed allocation accord with the sequential approach to site selection in relation to flood risk, and should any flood risk requirements be included in the policy?
  - c) Does the scale of the proposed allocation accord with the role of Laverstock in the settlement hierarchy?
  - d) Is the allocation sufficiently clear in terms of whether site specific measures are required as part of a future development to neutralise levels of phosphates flowing into the River Avon Special Area of Conservation?
  - e) Is the requirement for provision of SANG sufficiently clear?

*Policy 31 - Salisbury Central Area*

- 6.34 Is Policy 31 relating to the site allocation; positively prepared, justified, effective and consistent with national policy? Responses should specifically address:
- a) Does the policy provide sufficient guidance for each of the respective opportunity sites and what is expected on development proposals?
  - b) In light of the potential for residential development, has the site allocation passed the sequential approach to site selection having regard to flood risk? What evidence is there to demonstrate development would be safe?

*Policy 32 - Salisbury Skyline*

- 6.35 Is Policy 32; positively prepared, justified, effective and consistent with national policy? Responses should specifically address:
- a) Taking each of the requirements in bullets 1-3 in turn, are they justified and effective? Are they supported by evidence?

*Policy 33 - The Maltings and Central Car Park*

- 6.36 Is Policy 33 relating to the site allocation; positively prepared, justified, effective and consistent with national policy? Responses should specifically address:
- a) Is it sufficiently clear on the amount of residential, retail, service and leisure and other uses expected to come forward on the site?
  - b) Has the site been subject to the sequential approach to site selection having regard to flood risk?
  - c) Is public funding required to bring forward the site for the range of uses set out in the policy, and is there a reasonable prospect of it being developed during the plan period?

#### *Policy 34 - Churchfields Employment Area*

6.37 Is Policy 34 relating to the site allocation; positively prepared, justified, effective and consistent with national policy? Responses should specifically address:

- a) Are the requirements relating to restrictions on HGV traffic and the measures to minimise on-street parking justified and sufficiently clear to be effective?
- b) What is the status of the 'Estate Regeneration Plan and accessibility study'? Has it been completed, and if so, what does it recommend and why are any requirements not included in the policy?

#### *Policy 35 - Salisbury District Hospital Campus*

6.38 Is Policy 35 relating to the site allocation; positively prepared, justified, effective and consistent with national policy? Responses should specifically address:

- a) Is the anticipated scale of developable land justified given that further master planning is required?
- b) Would the allocation have any effect on the setting of the National Landscape?
- c) Is the policy sufficiently clear regarding the extent of any existing or future key workers dwellings on the site?

#### *Policy 37 - Boscombe Down*

6.39 Is Policy 37 relating to the site allocation; positively prepared, justified, effective and consistent with national policy? Responses should specifically address:

- a) Does the policy provide sufficient clarity to guide any additional employment development at Boscombe Down?

#### *Policy 38 - Porton Down*

6.40 Is Policy 38 relating to the site allocation; positively prepared, justified, effective and consistent with national policy? Responses should specifically address:

- a) Does the policy provide sufficient clarity to guide any additional employment development at Porton Down?
- b) Is the policy necessary in light of other policies in the Plan?
- c) Is the High Post Industrial Area intended to fall within the scope of Policy 38?

#### *Policy 40 - Land south east of Empress Way, Ludgershall*

6.41 Is Policy 40 relating to the site allocation; positively prepared, justified, effective and consistent with national policy? Responses should specifically address:

- a) Is the site allocation justified in terms of the apportionment of approximately 1,220 dwellings, 0.7ha of employment land, two 0.3ha sites for two 80 place early years nurseries and a local centre?
- b) Is the requirement for determining the trigger point for the access via a transport assessment justified? What effect does this have on the timing of new housing on the site coming forward for development?



- c) Are the requirements relating to access arrangements justified and effective, given that Andover Road lies outside of Wiltshire?
- d) Are the other requirements of the policy in the bullet points effective?

*Policy 41 - Land at Bulbridge Estate, Wilton*

- 6.42 Is Policy 41 relating to the site allocation; positively prepared, justified, effective and consistent with national policy? Responses should specifically address:
- a) Is the allocation justified, and should it be clearer how access would be achieved?
  - b) Would the proposed allocation have any effect on nearby National Landscapes or their setting?

*Policy 42 - Land at Dead Maid Quarry Employment Area, Mere*

- 6.43 Is Policy 42 relating to the site allocation; positively prepared, justified, effective and consistent with national policy? Responses should specifically address:
- a) Whether the allocation is justified for the 1.5ha of employment uses specified and are they compatible with the on-site habitat associated with Norwood?
  - b) Would the proposed allocation have any effect on nearby National Landscapes or their setting?

*Policy 43 - Land safeguarded for education at Tanner's Lane, Shrewton*

- 6.44 Is Policy 43 relating to the site allocation; positively prepared, justified, effective and consistent with national policy? Responses should specifically address:
- a) Is the proposed allocation justified as safeguarded for pre-school provision?
  - b) Is there a reasonable prospect of the site coming forward during the plan period?

**Questions**

*Swindon Housing Market Area Site Allocations*

**Relevant Policies - 45, 46, 48, 49, 50, 51**

*Policy 45 - Land at Chopping Knife Lane, Marlborough*

- 6.45 Is Policy 45 relating to the site allocation; positively prepared, justified, effective and consistent with national policy? Responses should specifically address:
- a) Is the proposed allocation justified and effective in the absence of detail on water supply and wastewater infrastructure that may be required?
  - b) Is there specific justification for the requirement that vehicular access is taken from White Horse Road, in preference to potential alternatives such as from Elcot Lane?
  - c) Is the intended approach in the policy for development sufficiently clear to be effective and consistent with national policy in terms of requirements relating to:
    - i. the wooded skyline and limiting development to the east of the site, and;
    - ii. hedgerows and trees?

- d) Would the proposed allocation have any adverse impacts on the North Wessex Downs National Landscape, the River Kennet Site of Special Scientific Interest or the setting of nearby heritage assets?

*Policy 46 - Land off Barton Dene, Marlborough*

- 6.46 Is Policy 46 relating to the site allocation; positively prepared, justified, effective and consistent with national policy? Responses should specifically address:
- a) Is the allocation justified, including for the proposed mix of housing and employment development, the amount of development intended to be accommodated and any water supply and wastewater infrastructure that may be required?
  - b) Would the allocation for residential and employment development in this location be capable of providing a safe and suitable access via Barton Dene for all future users?
  - c) Would the second access referred to from College Fields (if required to ensure safe pedestrian, cycle and emergency access) be feasible noting the presence of existing development including Marlborough Leisure Centre?
  - d) Is the intended approach in the policy sufficiently clear to be justified and effective in terms of proposed requirements to limit the density and height of development?
  - e) Would the proposed allocation have any adverse impacts on a National Landscape, biodiversity or the setting of nearby heritage assets?

*Policy 48 - Land at Marsh Farm, Royal Wootton Bassett*

- 6.47 Is Policy 48 relating to the site allocation; positively prepared, justified, effective and consistent with national policy? Responses should specifically address:
- a) Whether the proposed allocation is justified for residential development of approximately 150 dwellings, having regard to the recent planning history of the site?
  - b) Would the proposed allocation have any adverse impacts on the Jubilee Lake Local Nature Reserve or the setting of nearby heritage assets?

*Policy 49 - Land at Midge Hall Farm, Royal Wootton Bassett*

- 6.48 Is Policy 49 relating to the site allocation; positively prepared, justified, effective and consistent with national policy? Responses should specifically address:
- a) Is the proposed allocation justified for a mixed-use development (approximately 415 dwellings, 1.8 ha of office development, a local centre and 2ha of land for a 2 form entry primary school including space for a nursery)?
  - b) Should the requirements of the site allocation include any necessary measures to manage any effects upon Jubilee Lake Local Nature Reserve?

*Policy 50 - Land West of Maple Drive, Royal Wootton Bassett*

- 6.49 Is Policy 50 relating to the site allocation; positively prepared, justified, effective and consistent with national policy? Responses should specifically address:
- a) Is the proposed allocation justified for a residential development of approximately 70 dwellings?

- b) Whether there is specific justification for the requirement that vehicular access is taken from Maple Drive, and whether Lucerne Close is capable of providing a safe and suitable secondary access?
- c) Should any justified restriction on development heights be more specific to ensure that it is evident how a decision maker should react to a development proposal?
- d) Would the proposed allocation have any adverse impacts on the Jubilee Lake Local Nature Reserve or other biodiversity assets within the site, such as local springs?

*Policy 51 - Land at Woodshaw, Royal Wootton Bassett*

6.50 Is Policy 51 relating to the site allocation; positively prepared, justified, effective and consistent with national policy? Responses should specifically address:

- a) Whether the proposed allocation for a mixed-use development (approximately 445 dwellings, a local centre, convenience store and 0.4ha of land for nursery provision), including its relationship with the settings of heritage assets, is justified?
- b) Is there specific evidence to justify that Bicknoll Lane and the un-named lane leading to Strawberry Cottage would each be capable of providing a safe and suitable access for all future users? Would this be compatible with other requirements that seek to limit development in the south and east of the site?
- c) Is the development within the allocation dependent on the capacity enhancement of the A3102 roundabout to the north of the site, and is the policy sufficiently clear in terms of how and when it should be delivered?
- d) Are the upgrades that are considered necessary to the 99 bus service and the other enhancements and extensions to existing public transport that are required, sufficiently clear?
- e) Is the extent to which a future development proposal would be expected to contribute to infrastructure upgrades and associated projects, sufficiently clear?
- f) Is the indicative location of the local centre justified when having regard to its relationship with the setting of the Scheduled Monument within the site?

## Questions

*Trowbridge Housing Market Area Site Allocations*

**Relevant Policies - 53, 54, 55, 56, 59, 61, 62, 63**

*Policy 53 - Land North-East of Hilperton, Trowbridge*

6.51 Is Policy 53 relating to the site allocation; positively prepared, justified, effective and consistent with national policy? Responses should specifically address:

- a) Whether the proposed allocation for a mixed-use development (approximately 600 dwellings, 2ha of land for a 2 form entry primary school, convenience store and 0.3 ha of land for an 80 place early years provision), is justified?
- b) Is there specific evidence to justify that the existing A361/Devizes Road roundabout would be incapable of providing a safe and suitable access for all future users? If so, should the proposed location of a new or upgraded roundabout for vehicular access to the site be made clearer?

- c) Would the delivery of development be contingent upon the provision of the off-site Suitable Alternative Natural Greenspace (North Trowbridge Country Park), and if so, are any contributions that may be required from future development proposals clear?
- d) Are the proposed requirements that seek to ensure a suitable relationship with the surrounding landscape and the setting of heritage assets, sufficiently clear?
- e) Are the requirements relating to green infrastructure and biodiversity, including the relationship with the Bath and Bradford on Avon Bats Special Area of Conservation, and are any contributions from development proposals thereto, sufficiently clear?
- f) Is the policy effective in terms of ensuring that the site would not be at risk of flooding or increase the risk of flooding elsewhere?

*Policy 54 - North Trowbridge Country Park*

6.52 Is Policy 54 relating to the site allocation; positively prepared, justified, effective and consistent with national policy? Responses should specifically address:

- a) Whether the proposed allocation is justified, including in terms of its intended function and developability as a Country Park of approximately 65ha in size functioning as SANG?
- b) Whether the expectations of development proposals set out in the reasoned justification (paragraphs 4.287 – 4.289) are justified and if so, should they be included in the policy wording for effectiveness and consistency with national policy?

*Policy 55 - Land at Innox Mills, Trowbridge*

6.53 Is Policy 55 relating to the site allocation; positively prepared, justified, effective and consistent with national policy? Responses should specifically address:

- a) Whether the proposed allocation for a mixed-use development (including approximately 175 dwellings and a minimum of 10% affordable housing provision) is justified?
- b) Should the mixed commercial, recreation and cultural uses intended to be permitted be more specific in the policy wording?
- c) Whether the access arrangements with the adjacent railway station directly relate to development of the proposed allocation and/or are justified?
- d) Whether requirements relating to biodiversity, including the relationship with the Bath and Bradford on Avon Bats Special Area of Conservation and any contributions from development proposals thereto, are sufficiently clear to be effective?
- e) Would the allocation have any adverse impacts on the setting of nearby heritage assets and are the related expectations effective and consistent with national policy?

*Policy 56 - Trowbridge Central Area*

6.54 Is Policy 56; positively prepared, justified, effective and consistent with national policy? Responses should specifically address:

- a) Is the approach for the Trowbridge Central Area justified, including the identification of the town centre boundary, primary shopping area, and areas of opportunity?
- b) Should the policy wording be clearer in terms of the specific uses that would be permitted in each location?

- c) Should the relationship of future development proposals with the Riverway Industrial Estate be addressed in the policy wording?

*Policy 59 - Land at Brook Street*

6.55 Is Policy 59 relating to the site allocation; positively prepared, justified, effective and consistent with national policy? Responses should specifically address:

- a) The Council have proposed in CD/41A to delete this proposed allocation from the Plan as it is not considered to be available for delivery. Would the deletion of the proposed allocation have any implications for the deliverability of growth as set out in Policy 58 and/or the relationship with the River Avon Special Area of Conservation?
- b) Are there any consequential modifications to other parts of the Plan (such as to tables, maps or figures) if the proposed allocation were to be deleted?

*Policy 61 - Land West of Mane Way, Westbury*

6.56 Is Policy 61 relating to the site allocation; positively prepared, justified, effective and consistent with national policy? Responses should specifically address:

- a) Is the proposed allocation justified for a residential development of approximately 220 dwellings as proposed in the policy?
- b) Is it justified in seeking that development proposals take account of the principles shown within the concept plan, given paragraph 4.318 of the Plan makes clear that the concept plan illustrates one treatment of the site and how it may be developed?
- c) Is the buffer required to all onsite watercourses sufficiently precise to be effective?
- d) Is the approach to retention of public rights of way links through the site justified and effective, or should it include flexibility for diversion of routes in specific circumstances?
- e) Are the requirements relating to biodiversity, including the relationships with the Bath and Bradford on Avon Bats Special Area of Conservation, Trowbridge Bat Mitigation Strategy, SANG and water meadows, sufficiently clear?
- f) The Council have proposed in CD/41A to correct annotations from Flood Zone 2 to Flood Zone 3 in Figure 4.45. For effectiveness, should the policy also include requirements that any development proposals which come forward would not be at risk of flooding or increase the risk of flooding elsewhere?
- g) Would the site have any effect on the setting of the Scheduled Monument having regard to the findings of the Heritage Impact Assessment? Is the inclusion of the monument within the allocation justified?
- h) Is the requirement for safeguarding land to the north of the site for a new road connection over the railway justified? How would this connection be funded? Is it viable? Is there a reasonable prospect that it will be brought forward during the plan period?

*Policy 62 - Land at Bratton Road, Westbury*

6.57 Is Policy 62 relating to the site allocation; positively prepared, justified, effective and consistent with national policy? Responses should specifically address:

- a) Whether the proposed allocation is justified for a residential development of approximately 260 dwellings and 0.3ha nursery provision as proposed?

- b) Whether development proposals should be required to take account of the principles shown within the concept plan, given paragraph 4.320 of the Plan makes clear that the concept plan illustrates one treatment of the site and how it may be developed?
- c) Would the primary access off Bratton Road and the other proposed accesses off of Mill Brook/White Horse View and via Coach Road and the Mill Brook development be capable of providing a safe and suitable access for all future users?
- d) Would the proposed means of access be compatible with other requirements seeking to limit development in the south and east of the site?
- e) Would the site have any effect on designated heritage assets or their setting having regard to the findings of the Heritage Impact Assessment?
- f) Whether the requirements relating to on-site renewable energy and biodiversity, including the relationship with the Bath and Bradford on Avon Bats Special Area of Conservation, Trowbridge Bat Mitigation Strategy, the requirements for SANG and the approach to water meadows, are sufficiently clear?
- g) Whether the expectations in terms of the relationships with the surrounding landscape, including nearby National Landscapes, are sufficiently clear?
- h) Is the policy effective in terms of ensuring that any development proposals that come forward would not be at risk of flooding or increase the risk of flooding elsewhere?

*Policy 63 - Westbury Country Park*

- 6.58 Is Policy 63 relating to the site allocation; positively prepared, justified, effective and consistent with national policy? Responses should specifically address:
- a) Is the proposed allocation justified for a country park of approximately 27ha in size functioning as a SANG?
  - b) Would the timing of SANG provision align with Policies 61 and 62?
  - c) For effectiveness, should the policy address any specific requirements relating to future management arrangements?
  - d) Are the policy requirements in the reasoned justification relating to the SANG justified? If so, should they be in the policy for effectiveness and consistency with national policy?

<b>Matter 7 - Design, place shaping and environmental considerations</b>
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**Issue:**

Whether the plan is positively prepared, justified, effective and consistent with national policy in relation to design, place shaping and environmental considerations.

**Questions**

**Relevant Policies – 4, 81, 83, 84, 85, 86, 87, 88, 89, 90, 91, 92, 93, 94, 95, 96, 97, 98, 99, 100, 101**

*High quality design and place shaping*

- 7.1 Policy 98 seeks to promote and encourage high quality design as part of place shaping; is it positively prepared, justified, effective and consistent with national policy in those respects? Responses should specifically address the following:

- a) Whether the individual and cumulative policy requirements of development proposals reflect a design-led approach and are they sufficiently clear, effective and consistent with national policy, so it is evident how a decision maker should react to development proposals?
- b) Are there any additional requirements set out in the reasoned justification that are not reflected in the policy wording, are they justified? If so, should they be added to Policy 98 (or other related policies of the Plan) to be effective?
- c) Are the intended requirements of the Design and Access Statement and which seek that development proposals accord with the Wiltshire Climate Strategy, justified and consistent with national policy?
- d) To be justified and consistent with national policy, should minimum density standards be included in the Plan rather than being deferred to other documents?

#### *Historic environment*

7.2 Policy 99 relates to conservation and enhancement of the historic environment. Are its approaches, positively prepared, justified, effective and consistent with national policy? Responses should address the following:

- a) Whether the approach is consistent with national policy which seeks to conserve and enhance the historic environment?
- b) Is any duplication or departure from national policy with respect to the range of designated heritage assets or non-designated assets; necessary and justified?
- c) In any case, are the policy requirements, justified, sufficiently clear and effective, so it is evident how a decision maker should react to relevant development proposals?

7.3 Is the approach of Policy 100 with respect to Stonehenge, Avebury and associated World Heritage Sites, justified, effective and consistent with national policy?

7.4 For effectiveness and to be justified, should Policy 100 make clear the circumstances when a Historic Impact Assessment may be required from development proposals including any buffer zones to be applied to the World Heritage Sites?

#### *Wiltshire's landscapes and dark skies*

7.5 Is Policy 91; positively prepared, justified and consistent with national policy in terms of conserving and enhancing Wiltshire's landscapes? Responses should address the following:

- a) Whether the approach to National Landscapes is consistent with paragraphs 176 and 177 of the Framework?
- b) If the expectations of development proposals in the reasoned justification (paragraphs 5.156 to 5.164) are justified, should they be included in the policy wording for effectiveness and consistency with national policy?

7.6 Is Policy 92; positively prepared, justified and consistent with national policy in terms of conserving and enhancing Wiltshire's dark skies? Responses should address the following:

- a) Whether the identification and prioritisation of an International Dark Sky Reserve and National Landscapes, is justified?

- b) If the expectations of development proposals in the reasoned justification (paragraph 5.175 to 5.179) are justified, should they be included in the policy wording for effectiveness and consistency with national policy?

*Climate change, including sustainable construction, renewable energy and embodied carbon*

7.7 Is Policy 4; positively prepared, justified, effective and consistent with national policy insofar as it sets out the overarching approach to addressing climate change? Responses should specifically address:

- a) Whether it is a strategic policy?
- b) Taking the criteria in Parts A, B, C and D in turn, related to minimising carbon emissions, maximising carbon storage and sequestration and mitigating and adapting to the impacts of climate change, are they justified, effective and consistent with national policy?
- c) Whether the requirement that Sustainable Energy Statements be provided in Part E would be justified for proposals for all new development?

7.8 Is Policy 85; positively prepared, justified, effective and consistent with national policy insofar as it sets out the approach to sustainable construction and low carbon energy? Responses should specifically address:

- a) Whether the expectation of new build residential development to achieve BREEAM excellent, the zero carbon in operation standard and the associated requirements, are justified and consistent with national policy (including the Written Ministerial Statement Planning: Local Energy Efficiency Standards - 13 December 2023)?
- b) Whether the other expectations of development proposals are sufficiently clear and justified and effective insofar as it would be evident how a decision maker should react to planning applications?
- c) If the expectations of development proposals in the reasoned justification (paragraphs 5.98 to 5.106) are justified, should they be included in the policy wording of Policy 85 for effectiveness and consistency with national policy?
- d) Is it sufficiently clear as to how any developer contributions arising from the policy requirements would be calculated and would they be consistent with national policy?

7.9 Is Policy 86; positively prepared, justified, effective and consistent with national policy insofar as it sets out the approach to renewable energy? Responses should specifically address the expectations of development proposals in terms of:

- a) landscapes, including National Landscapes.
- b) the New Forest National Park.
- c) the Green Belt.
- d) the historic environment, including World Heritage Sites and their setting.
- e) best and most versatile agricultural land.
- f) highway safety and cumulative impacts on the road network.
- g) the principles of waste management and the waste hierarchy.
- h) the amenity of local residents.



- 7.10 Is Policy 87; positively prepared, justified, effective and consistent with national policy insofar as it sets out the approach to embodied carbon? Responses should specifically address:
- a) Whether the requirement for major residential and/or non-residential development to be supported by an Embodied Carbon Assessment and a 900kg/sq.m threshold is justified and consistent with national policy (including the Written Ministerial Statement Planning: Local Energy Efficiency Standards - 13 December 2023)?
  - b) If the expectations of development proposals in the reasoned justification (paragraphs 5.114 to 5.116) are justified, should they be included in the policy wording for effectiveness and consistency with national policy?

*Biodiversity and geodiversity, including woodland, trees and hedgerows*

- 7.11 Is Policy 88; positively prepared, justified, effective and consistent with national policy insofar as it sets out the approach to biodiversity? Responses should specifically address:
- a) Whether the Plan overall would be effective in promoting the conservation of ecological networks and the protection and recovery of priority species?
  - b) Whether the Plan sufficiently identifies and pursues opportunities for securing enhancement of priority habitats?
  - c) Whether the components of local wildlife-rich habitats and wider ecological networks have been mapped in full as expected in national policy?
  - d) If the definition of the UK National Site Network is sufficiently clear to be effective?
  - e) Whether the approach to biodiversity is justified and consistent with national policy, when taking account of the statutory requirements for biodiversity net gain set out in the Environment Act 2021?
  - f) Whether the policy is justified and effective insofar as it requires all development proposals to clearly demonstrate how the mitigation hierarchy has been sequentially applied and demonstrate how they protect features of nature conservation value and geological value?
  - g) Are the other expectations of development proposals sufficiently clear and justified in terms of the policy requirements listed insofar as being evident how a decision maker should react to planning applications?
  - h) Is it sufficiently clear as to how any developer contributions arising from the policy requirements would be calculated, and would they be consistent with national policy?
  - i) Are there any requirements set out in the reasoned justification that are not reflected in the policy wording, are they justified and if so, should they be added to the policy wording (or other related policies of the Plan) to be effective?
- 7.12 Is Policy 89; positively prepared, justified, effective and consistent with national policy insofar as it sets out the approach to biodiversity net gain? Responses should specifically address:
- a) Is the requirement for 20% biodiversity net gain justified by specific local evidence?
  - b) Is the approach justified and consistent with national policy, insofar as seeking that planning applications subject to mandatory net gain must submit a Biodiversity Net Gain Plan in accordance with associated requirements listed in the policy?

- c) If the expectations of development proposals in the reasoned justification (paragraph 5.141) are justified, should they be included in the policy wording for effectiveness and consistency with national policy?

7.13 Is Policy 90; positively prepared, justified, effective and consistent with national policy with respect to the approach to woodlands, hedgerows and trees? Responses should specifically address:

- a) Whether the approach is justified in seemingly only applying to proposals for major development?
- b) If the expectations of development proposals in the reasoned justification (paragraph 5.145) are justified, should they be included in the policy for effectiveness and consistency with national policy?

*Community facilities, health and wellbeing, and public open space and play facilities*

7.14 Is Policy 81; positively prepared, justified, effective and consistent with national policy with respect to community facilities? Responses should specifically address the following:

- a) Is the approach expressing in principle support for the development of new community facilities within or adjoining settlement boundaries and Small Villages and the associated expectations of proposals, justified and effective?
- b) Whether the listed circumstances where redevelopment and loss of community facilities will be supported are justified and effective?
- c) Is the requirement to provide a comprehensive marketing plan in the defined circumstances, justified and are the associated expectations effective?

7.15 Is Policy 83; positively prepared, justified, effective and consistent with national policy with respect to health and wellbeing? Responses should specifically address:

- a) Whether the approach is justified and effective insofar as appropriately supporting the creation of healthy environments and safe, accessible, suitable and high-quality places, to improve physical and mental health and reduce health inequalities?
- b) Are the specific forms of development identified as requiring a health impact assessment to be carried out - justified and is the policy sufficiently clear to be effective in terms of what a health impact assessment should include?
- c) Are the requirements in terms of providing a healthy food environment, such as access to community gardens, community orchards and/or allotments, sufficiently clear to be effective?

7.16 Is Policy 84; positively prepared, justified, effective and consistent with national policy with respect to its approach to public open space and play facilities? Responses should specifically address:

- a) Whether it provides a clear strategy to address public open space and play facility deficiencies as identified in the Wiltshire Open Space Assessment in terms of quantity, quality and accessibility?
- b) Should the public open space and play facility standards underpinning the requirements of development proposals be included in policy wording or elsewhere in the Plan?

- c) Is the requirement for all major developments to submit an open space assessment justified and if so, are the expectations of its content sufficiently clear to be effective?
- d) How would on-site provision of and financial contributions from development proposals towards public open space and play facilities be calculated?
- e) Whether the policy should also include outdoor sports facilities/playing pitches?

#### *Green and blue infrastructure*

7.17 Is Policy 93; positively prepared, justified, effective and consistent with national policy with respect to the approach to green and blue infrastructure? Responses should specifically address:

- a) Whether all developments should make provision for retention or enhancement of green and blue infrastructure, or whether the policy should be focussed upon retention as a minimum and where possible enhancement?
- b) Whether linkages to other policies (for example, Policy 89) should be clearer?
- c) How would financial contributions from development proposals towards green and blue infrastructure projects and initiatives be calculated?
- d) If the expectations of development proposals in the reasoned justification (paragraphs 5.194 and 5.196) are justified, should they be included in the policy wording?
- e) Whether the green and blue infrastructure in Wiltshire should be underpinned by Settlement Frameworks as referred to in the reasoned justification and be mapped in the Plan and/or the Policies Map?

#### *Water resources*

7.18 Is Policy 94; positively prepared, justified, effective and consistent with national policy in terms of Wiltshire's canals and the boating community? Responses should specifically address:

- a) Whether it should be clearer in terms of how financial contributions from development proposals will be calculated?
- b) If the expectations of development proposals in the reasoned justification (paragraph 5.203) are justified, should they be included in the policy wording?
- c) Whether there is a reason why provision to meet any identified needs for residential moorings as referred to in paragraph 5.206 has seemingly not been identified?
- d) Whether the associated approach for planning applications set out in the policy wording would be effective and consistent with national policy?
- e) Policy 96 seeks water efficiency insofar as new residential development should have a predicted mains water consumption of no more than 85 litres per person per day. It also requires that non-household development achieve a score of three credits within the water (Wat 01 Water Consumption) issue category for the BREEAM New Construction Standard, achieving 40% reduction against baseline standards. Are those approaches to water efficiency, and the other requirements, justified and consistent with national policy?
- f) For effectiveness and to ensure that Policy 96 is justified, should it be made clear whether the Policies Map or other evidence (i.e. up-to-date Environment Agency mapping) identify the Source Protection Zone, Safeguard Zone or Water Protection Zone?

### *Flood risk and drainage*

- 7.19 Is Policy 95; positively prepared, justified, effective and consistent with national policy in terms of flood risk? Responses should specifically address the following:
- a) Whether the approach is consistent with national policy which seeks to avoid inappropriate development in areas at risk of flooding by directing development away from areas at highest risk?
  - b) Are the approaches to flood defences, water management, drainage and sustainable drainage systems (SuDS) effective and consistent with national policy?
  - c) Is the proposed greenfield run-off rate betterment of 20% as submitted, and/or alternatives set out in the Wiltshire Council Drainage Betterment Strategy - June 2024, justified?
  - d) Is it justified and consistent with national policy that requirements in terms of SuDS would apply to all new development? Or should the policy be more specific in terms of the type, form and/or scale of development and/or allow for clear evidence of circumstances where SuDs would be inappropriate?
  - e) Is it justified and consistent with national policy with respect to the expectations of a drainage strategy, given the definition of a 'design flood' in Planning Practice Guidance?
  - f) Are the policy requirements sufficiently clear to be effective in terms of when development proposals will be required to provide supporting evidence?

### *Policy 97 - Contaminated land*

- 7.20 Are the expectations of development proposals in Policy 97, sufficiently clear in terms of when such considerations would apply, justified in terms of the associated development requirements and effective insofar as how a decision maker should react?
- 7.21 If the expectations of development proposals in the reasoned justification (paragraphs 5.221, 5.224, 5.226 and 5.227) are justified, should they be included in the policy wording for effectiveness and consistency with national policy?

### *Policy 101 - Air quality*

- 7.22 For effectiveness and consistency with national policy, should Policy 101 be clearer regarding the approach to development proposals in Air Quality Management Areas and the circumstances when air quality assessments may be required? Responses should specifically address:
- a) Whether the list of pollutants of particular concern as set out in the policy are justified and consistent with national policy?
  - b) Whether the expectations of development proposals with respect to avoiding exacerbating poor air quality and seeking mitigation measures that make a positive contribution to the Air Quality Strategy for Wiltshire and where relevant, the Wiltshire Air Quality Action Plan; are justified, effective and consistent with national policy?
  - c) If the expectations of development proposals in the reasoned justification (paragraphs 5.257 and 5.259) are justified, should they be included in the policy wording for effectiveness and consistency with national policy?

- d) Is the Plan, including Policy 101, sufficiently clear as to when and how any developer contributions arising from the approach to air quality would be calculated and whether they would otherwise be consistent with national policy?

## **Matter 8 - Monitoring**

### **Issue**

Whether the Plan would be able to be monitored effectively to ensure timely delivery of its proposals and allocations?

### **Questions**

- 8.1 How would the implementation of the Plan policies be achieved? What mechanisms are there to assist development sites to come forward/progress?
- 8.2 How would the implementation of the Plan be monitored? Would it be effective? How would the results of monitoring be acted upon, for example what would trigger a review of the Plan?

## **Matter 9 - The supply and delivery of housing land**

### **Issue**

Whether the approach towards the supply and delivery of housing land is positively prepared, justified, effective and consistent with national policy.

### **Questions**

#### *Overall Supply*

- 9.1 Has there been an update on housing completions from the most recent monitoring year and if so what is it?
- 9.2 What is the estimated total supply of new housing over the Plan period and how has this been determined?
- 9.3 What is the estimated supply from existing site allocations, proposed site allocations, existing planning permissions, other commitments (e.g. sites with resolution to grant planning permission subject to completion of planning obligations), together with other sources of supply such as broad locations, the new settlement and windfalls for the Plan period?
- 9.4 What informed the assumptions about the scale and timing of supply in relation to build-out rates and lead-in times from those various sources? Are the assumptions and estimates realistic and based upon up-to-date evidence?
- 9.5 What effect would the removal of the sites identified in the Council's schedule of proposed changes paper [SD/41A] have on the overall housing trajectory?
- 9.6 Does the housing supply include any other sites which should not be considered developable during the Plan period?

- 9.7 Is there any evidence of previous allocations or planning permissions not being brought forward or delivered in a timely manner so as to justify a lapse rate to be applied to the housing trajectory?
- 9.8 Is the approach to reserve sites justified and consistent with national policy, when having regard to the overall land supply for housing?
- 9.9 For effectiveness, should the reserved sites be allocated for development during the Plan period?

*5 year housing supply*

- 9.10 What is the requirement for the first five years following the anticipated adoption of the plan and what buffer should be applied?
- 9.11 What is the estimated total supply of specific deliverable sites for this period?
- 9.12 What is the estimated supply from each source for this?
- 9.13 What is the evidence to support this and are the estimates justified?
- 9.14 Is there any clear evidence that sites within the supply should not be considered deliverable within 5-years?

*6-10 and 11-15 year land supply*

- 9.15 What is the estimated total supply of specific developable sites or broad locations for growth for years 6-10 and 11-15?
- 9.16 What is the estimated supply from each source for this?
- 9.17 What is the evidence to support this and are the estimates justified?

*Other*

- 9.18 Is the windfall allowance justified?
- 9.19 Does the plan provide sufficient flexibility if any key sites do not come forward as anticipated?
- 9.20 Overall, would at least 10% of the housing requirement/target be met on sites no larger than one hectare?

**DEADLINE FOR SUBMISSION OF HEARING STATEMENTS FOR EXAMINATION STAGE  
THREE HEARINGS (MATTERS 6 to 9) - 5PM ON FRIDAY 21 NOVEMBER 2025**

*Philip Mileham*

INSPECTOR

*Gareth Wildgoose*

INSPECTOR

25 September 2025

END