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A specialist team within DLP Planning Ltd

For and on behalf of
Royal Wootton Bassett Town Council

WILTSHIRE LOCAL PLAN REG. 19 CONSULTATION INITIAL APPRAISAL & RECOMMENDATIONS REPORT

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1.0 INTRODUCTION

- 1.1 This report has been prepared on behalf of Royal Wootton Bassett Town Council as an initial review of the Draft Wiltshire Local Plan, which is due to be published for formal consultation under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 on 27th September 2023.
 - 1.2 The Draft Local Plan covers the period 2020 to 2038 and represents a 'review' of the current Wiltshire Core Strategy and saved policies of the former district council. Whilst Wiltshire Council have stated that it is not a 'new' plan, it does include a new strategy for growth and housing requirement figure which will have implications for Royal Wootton Bassett, including containing new strategic policies with which the Neighbourhood Plan will need to be in conformity once these policies are adopted.
 - 1.3 This introductory section of this report sets out the context for the Regulation 19 consultation and the scope of representations which can be made. The remainder of this report then reviews the Draft Local Plan consultation documentation which is currently available in the context of the potential implications for the future growth of Royal Wootton Bassett and the development of the Neighbourhood Plan, which DLP is currently working with the Town Council to develop.
 - 1.4 Each section also sets out conclusions and recommendations on which aspects of the Draft Local Plan should be further interrogated when all consultation materials and evidence are officially published at the start of the consultation period, and may form the basis of formal written representations.
 - 1.5 It should be noted that this initial review report is based on the Draft Local Plan documentation was published at the time of writing. We would expect further evidence base and supporting documentation to be published at the start of the consultation period.
- a) Previous Consultation on Draft Wiltshire Local Plan Review**
- 1.6 In winter 2017, an initial consultation was undertaken on the proposed scope and content of the Local Plan Review in accordance with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012.
 - 1.7 This was followed, in late 2018, by an informal consultation with town and parish councils to consider where growth could be located and at what scale in the main towns and rural areas.
 - 1.8 Following changes to the National Planning Policy Framework (NPPF) and the Government's introduction of the standard method for calculating housing need, an updated housing requirement figure and revised preferred strategy was developed.
 - 1.9 A further Regulation 18 consultation on the Draft Wiltshire Local Plan was then held in January to March 2021. This consultation presented details of Wiltshire Council's emerging spatial strategy and options for site allocations in each of the main settlements, including Royal Wootton Bassett.
 - 1.10 DLP prepared a response to this consultation on behalf of the Town Council which set out comments on the emerging spatial strategy, the Council's proposed approach to identifying brownfield land targets, the scale of growth and 'place shaping priorities' proposed for Royal Wootton Bassett, and the potential development sites proposed for the town.
 - 1.11 In respect of the 'pool of sites' that were proposed as potential allocations within and around Royal Wootton Bassett, the Town Council expressed 'in principle' support for three sites located to the west and south of the town, should a large scale strategic allocation at the town be required.
 - 1.12 Only one of the Town Council's preferred sites (Land at Maple Drive) has been taken forward

as a proposed allocation in the Regulation 19 Draft Local Plan. The four strategic site allocations that are proposed for Royal Wootton Bassett are reviewed in Section 4 of this report.

b) Regulation 19 Consultation

1.13 The forthcoming Regulation 19 consultation will take place for a minimum period of six weeks and will be the final opportunity for interested parties to comment on the Draft Local Plan before it is formally submitted to the Planning Inspectorate for Examination.

1.14 Unlike earlier consultation stages, the Regulation 19 consultation questions are set by the Planning Inspectorate and require respondents to refer to specific parts of the Plan, and to state if they support or object and to refer to the statutory tests of Legal Compliance, Soundness or Duty to Cooperate.

1.15 The scope of representation responses at Regulation 19 stage are therefore more constrained than at earlier consultation stages as they should focus primarily on the tests of soundness and legal compliance, rather than on the overall content of the Plan itself.

1.16 The tests of soundness set out in paragraph 35 of the NPPF, which requires that local plans and spatial development strategies are examined to assess whether they are sound. Local plans are also required to meet relevant legal requirements, including Strategic Environmental Assessment (SEA). Plans are 'sound' if they are:

***“Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;*

***Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;*

***Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and*

***Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.”*

(Paragraph 35, NPPF 2023, emphasis added)

1.17 It should be noted that failing the tests of soundness does not necessarily mean that a plan will be withdrawn or fail Examination. Where valid soundness criticisms are identified any appointed Inspector would typically invite the local planning authority to propose Modifications to address these – for example by clarifying criteria for development and requirements for mitigation, amending site capacities or clarifying the future relationship between the Local Plan and Neighbourhood Plan (e.g., the housing requirement for the neighbourhood area and scope of non-strategic policies that the Town Council might subsequently look to prepare).

1.18 Most soundness issues can normally be addressed via Modifications to the plan and soundness issues are not in themselves typically reflective of failing the legal requirements for plan-making. The only legal requirement for plan preparation that cannot be retrospectively addressed is the Duty to Cooperate and to some extent this does pertain to the *positively prepared* test of soundness and the outcomes of plan-making in terms of engagement and agreement with relevant prescribed bodies (including neighbouring local planning authorities). It is also generally quite difficult to fail on other procedural and legal requirements, such as those relating to SEA and Sustainability Appraisal, and the latter of

these can potentially be addressed during the Examination.

- 1.19 The following sections of this report set out our initial review of the Draft Local Plan documentation that is of relevance to Royal Wootton Bassett (and the emerging Neighbourhood Plan) and had been published at the time of writing. The documents that have been subject to this initial review include:
- Wiltshire Local Plan Pre-Submission Draft 2020-2038 (July 2023)
 - Planning for Royal Wootton Bassett (July 2023)
 - Wiltshire Local Plan Review – Revising the Spatial Strategy (July 2023)
 - Site Selection Methodology Paper (July 2023)
 - Housing Delivery Paper (July 2023)
 - Wiltshire Local Housing Needs Assessment Update (Volume 1, May 2022)
 - Wiltshire Local Housing Needs Assessment Update (Volume 2, February 2023)
 - Strategic Housing and Economic Land Availability Assessment (2017)
 - Wiltshire Sustainability Appraisal Scoping Report (February 2019)
- 1.20 It is anticipated that other updated evidence base and supporting documents (including Transport Assessments, Employment Needs Assessments, Infrastructure Delivery Plan, Viability Assessments and a full Sustainability Appraisal) will be published at the start of the formal consultation period. It is recommended that these documents are reviewed as part of preparing any formal representations.
- 1.21 It should also be noted that this report sets out the Strategic Planning Research Unit's objective professional opinion on matters directly related to the soundness of the Draft Local Plan, Duty to Cooperate and other legal requirements (as far as we are able to comment on these based on the information available) on which the Town Council may wish to make representations through the forthcoming consultation. This may not pick up all of the Town Council's concerns relating to the draft Local Plan by virtue of the fact it focuses on matters related only to the plan's soundness. This would not however preclude the Town Council submitting its own representations on other issues that are of concern, should they so wish.

2.0 SPATIAL STRATEGY FOR WILTSHIRE

2.1 As part of developing the Pre-Submission Draft Local Plan (2020 – 2038) the spatial strategy in the adopted Wiltshire Core Strategy was reviewed.

a) Overall Housing Need

2.2 The starting point for calculating the overall housing need was the Government's standard method which results in a forecast figure of 2,041 dwellings per annum or 36,740 dwellings for the plan period.

2.3 The Council concluded that the Standard Method provides a sufficiently robust assessment of local housing need. The Council found that there did not appear to be strong grounds to identify a housing requirement in excess of the Standard Method (for example, to increase affordable housing delivery or to support economic growth).

2.4 The Draft Local Plan plans for 36,740 homes, of which over 21,900 have already been built or are committed (i.e. already have planning permission), leaving a residual requirement of around 14,800 dwellings. This is a reduction on the overall figure of 45,630 identified in the 2021 consultation Draft Local Plan.

2.5 The Local Housing Needs Assessment (2023) identifies an increased need for new homes in both the Swindon housing market area (which includes Royal Wootton Bassett) and the Salisbury housing market area, with reductions in the Chippenham and Trowbridge areas. The emerging spatial strategy consulted on in 2021 has therefore been revised.

2.6 The identified housing need for Royal Wootton Bassett has increased from the 1,255 homes for the period 2016 to 2036 (63 dwellings per annum, dpa), as set out in the 2021 consultation, to 1,340 homes for the revised plan period 2020 to 2038 (set out in the Regulation 19 consultation).

b) Settlement Strategy and Delivery Strategy

2.7 The Pre-Submission Draft Local Plan contains a Spatial Strategy including a Settlement Strategy which identifies the settlements where sustainable development will take place. Apart from Principal Settlements, Market Towns are defined as settlements that have the ability to support sustainable patterns of living in Wiltshire through their current levels of facilities, services and employment opportunities. Royal Wootton Bassett is one such Market Town.

2.8 Around 40% of homes to be delivered over the plan period will be in the three Principal Settlements of Chippenham, Salisbury and Trowbridge, with around 36% at the other Market Towns. The amount of housing growth proposed in Royal Wootton Bassett (1,340 houses) represents 3.6% of the overall planning level of housing growth for Wiltshire.

2.9 In respect of Market Towns, **Policy 1** 'Settlement Strategy' states that:

"Market Towns have the potential for significant development that will increase the jobs and homes in each town in order to help sustain and where necessary enhance their services and facilities and promote better levels of self containment and viable sustainable communities."

2.10 **Policy 2** 'Delivery Strategy' sets out the overall scale of housing and employment growth in each type of settlement over the plan period. **Policy 2** seeks to deliver development in Wiltshire by making provision for approximately 160ha of new employment land (Use Class B2, B8, E(g)(i-iii) and approximately 36,740 homes over the plan period 2020 to 2038.

2.11 In accordance with the Settlement Strategy, growth is focused on Principal Settlements followed by Market Towns (and then Local Service Centres and Large Villages). **Policy 2**

states:

“Scales of growth and priorities for the development of Principal Settlements and Market Towns are set out in the Area Strategies for each settlement. Sites are identified within and on the edge of settlement boundaries where development will be supported. Additional housing allocations can be identified through local communities preparing neighbourhood plans and a subsequent site allocation development plan document.”

- 2.12 It is unclear what types and scale of development a ‘subsequent site allocation development plan document’ would deliver. There are also no references to a separate or updated site allocations document in the Council’s most recently published Local Development Scheme (December 2022), therefore this reference may be a typographical error.
- 2.13 For each of the four separate Housing Market Areas (HMAs) the Council has prepared an Area Strategy. Royal Wootton Bassett is within the Swindon HMA (within Wiltshire, outside of Swindon Borough) and for the whole Swindon HMA, the estimated housing need is for 3,455 dwellings between 2020 and 2038.
- 2.14 The Swindon HMA aligns with the Swindon Functional Economic Market Area (FEMA), for which there is a forecast employment land demand for a maximum of 18.1 hectares over the period 2020 to 2038. 8.7 hectares’ employment land is allocated within the Swindon FEMA through the Local Plan policies.
- 2.15 The Swindon HMA includes the two market towns of Marlborough and Royal Wootton Bassett. The latter is, according to the Council, much less constrained than Marlborough, which is located within the North Wessex Downs Area of Outstanding Natural Beauty (AONB). Royal Wootton Bassett will therefore continue to be a focus for growth, including employment development. The Plan envisages the town having a stronger role, diminishing its strong reliance toward Swindon by greater provision for local jobs and additional services and facilities, which it states will help promote greater self-containment. Higher rates of housing growth are proposed than the previous plan but, at a rate not substantially higher than actual levels delivered (paragraph 4.221).
- 2.16 Further details on the growth planned in Royal Wootton Bassett are presented in Section 3 of this report.

c) Infrastructure Strategy

- 2.17 **Policy 5** of the Draft Local Plan seeks to secure infrastructure provision from new development, stating:
- “All new development will be required to provide for the necessary on-site and, where appropriate, off-site infrastructure requirements arising from the proposal. Infrastructure requirements will be delivered directly by the developer and/ or through an appropriate financial contribution prior to, or in conjunction with, new development.”*
- 2.18 The updated Infrastructure Delivery Plan which underpins this policy has not yet been published. This should be reviewed, when published, to consider the infrastructure requirements identified for Royal Wootton Bassett and the delivery / funding mechanisms identified for these.
- 2.19 As set out in **Policy 5**, it is expected that infrastructure will be delivered through a combination of methods, including direct provision by the Council and public/private sector partners, planning conditions and section 106 agreements, other developer contributions, local area boards, and the Community Infrastructure Levy (CIL).

d) Conclusions and Recommendations

- 2.20 In terms of the overall scale of growth to be delivered within the Swindon HMA over the plan period (3,450 dwellings), this appears to be justified on the basis of the Council's assessment of housing need, particularly given that the Council intends to meet only the minimum requirement as set by national policy.
- 2.21 The Spatial Strategy for the Local Plan directs a significant proportion of this growth towards Royal Wootton Bassett, which again seems justified given the size of the town, its locational sustainability, and the limited environmental constraints compared with Marlborough. It is also worth noting that the Regulation 18 Draft Local Plan tested three iterative spatial strategy options, which then informed the final Spatial Strategy in the Regulation 19 Draft Local Plan. Whilst the Town Council may not agree with the four preferred site allocation options chosen, the iterative process by which they were selected seems appropriate.
- 2.22 It is however recommended that the Infrastructure Delivery Plan is reviewed, when published, to ensure that the infrastructure requirements identified for Royal Wootton Bassett and the delivery / funding mechanisms identified are justified and will enable the growth that is planned for to be delivered, thereby ensuring that the plan is **effective**.

3.0 PLANNING FOR ROYAL WOOTTON BASSETT

3.1 In Paragraph 4.242, the Council confirms that Royal Wootton Bassett will continue to be a focus for growth within the Swindon HMA over the Plan period. It is the largest settlement in the area with reasonable employment opportunities and services and facilities. By focusing housing and employment growth in the town, the Local Plan states this will help promote greater self-containment. Given that Royal Wootton Bassett is one of the largest Market Towns in the Swindon HMA, with fewer constraints than Marlborough, this focus on Royal Wootton Bassett would appear to be a justified approach.

a) Housing

3.2 As set out in Table 4.10 of the Draft Local Plan, there is a requirement for 1,340 dwellings in Royal Wootton Bassett over the plan period. This represents around 39% of overall growth across the Swindon HMA (3,450 dwellings). The remaining 61% of growth will be delivered in Marlborough (17%) and the rural area (44%).

3.3 Table 4.10 also identifies that as of 1st April 2022, there were 113 completions and commitments in Royal Wootton Bassett (dwellings already delivered or with planning permission since 2020), leaving a total of 1,230 to be allocated through the Local Plan.

3.4 The Draft Local Plan proposes that this residual dwelling requirement will be delivered as:

- A new allocation for approximately 150 dwellings on Land at Marsh Farm;
- A new allocation for approximately 415 dwellings on Land at Midge Hall Farm;
- A new allocation of approximately 70 dwellings on Land West of Maple Drive;
- A new allocation of approximately 445 dwellings on Land at Woodshaw;
- Approximately 150 dwellings to be delivered through the Neighbourhood Plan.

3.5 **Policy 47** 'Royal Wootton Bassett Market Town' states that:

"over the plan period approximately 1,230 homes and 6.9ha of employment land will be provided at Royal Wootton Bassett"

3.6 The figure of 1,230 homes in Policy 47 is incorrect. This should state the overall figure that will be delivered, which is 1,340 homes.

b) Employment

3.7 Table 4.11 also identifies an employment land supply of 6.9 hectares in Royal Wootton Bassett (compared with 1.8 hectares in Marlborough).

3.8 As set out in **Policy 47**, this includes the existing employment allocation at Templars Way and other permissions/completions (5.1 hectares) and an additional employment allocation of 1.8 hectares on Land at Midge Hall Farm.

3.9 The Draft Local Plan also proposes to retain the Principal Employment Areas of Whitehill Industrial Estate, Interface Industrial Estate and Coped Hall Business Park (**Policy 65**).

c) Utilities Infrastructure

3.10 Paragraph 4.243 of the Draft Local Plan states, in respect of the growth proposed at Royal Wootton Bassett, that:

"Water supply capacity in the area is constrained and the potential for further abstraction licence reductions in the next 10 years would require investment in a major infrastructure development project to support significant new development at the town, which would take significant time to develop and deliver (3-5 years from commencement)."

3.11 Furthermore, the 'Planning for Royal Wootton Bassett' document states:

"In the near future (10 years) there is potential for abstraction licence reduction at the source feeding this area, which would only enable Thames Water to support current demand for water in this area. It is highly likely that large scale growth will require a major infrastructure development project to enable Thames Water to support new and existing customers. This will take a significant time to develop and deliver (3-5 years) and so early engagement is imperative."

3.12 It is unclear from the information currently available how this infrastructure requirement has been factored into the deliverability and viability of the proposed site allocations and their timescales for development.

3.13 In respect of sewage treatment works capacity, the 'Planning for Royal Wootton Bassett' document states:

"Wessex Water advised that investment in infrastructure in Royal Wootton Bassett will be required, and further appraisal would be needed. Recent improvements have been designed and approved for construction to improve foul network operation north of the railway, but these do not consider further development of the scale planned at Royal Wootton Bassett. Significant improvements are likely to be required."

3.14 Again it is unclear how these constraints have been factored into the assessment of sites and their deliverability. **Policy 47** states that development at Royal Wootton Bassett will *"deliver significant investment in foul water capacity in the area"*, although it is unclear precisely how this will be delivered. It is recommended that the Infrastructure Delivery Plan is reviewed when published.

3.15 In respect of energy infrastructure, the 'Planning for Royal Wootton Bassett' states:

"It is considered that the current energy infrastructure could cope with the increased demand, reducing the cost associated with reinforcing the grid. However further evidence is required to confirm this / conversation with SSEN would be required to ensure connectivity to the grid."

3.16 It is unclear whether these conversations with SSEN have taken place and whether confirmation has been received. This should be taken into account when reviewing the final published consultation documentation.

d) Transport Infrastructure

3.17 In terms of transport infrastructure, **Policy 47** also states that development at Royal Wootton Bassett will *"maintain the safety and function of Junction 16 of the M4 and surrounding strategic road network throughout the Plan period, and investigate opportunities to better manage and mitigate levels of congestion on the local road network and town centre"* and *"deliver funding contributions towards a Royal Wootton Bassett Transport Strategy"*.

3.18 Furthermore, the 'Planning for Royal Wootton Bassett' document states that:

"All sites within RWB will need to be impact tested at Junction 16 of the M4 to determine any necessary capacity enhancements. Initial assessments have suggested the potential for on-line queuing, which may either need resolving through revised slip design and/or assessment using National Highways VISSIM model to establish what may be achieved within the junction circulatory."

3.19 Again, it is unclear precisely what improvements may be required to Junction 16 and the strategic road network, and how these will be delivered through the proposed site allocations or by other means. It is recommended that the outcomes of this testing and modelling work are reviewed when published.

3.20 **Policy 75** 'Strategic Transport Network' states that *"the strategic transport network along the A350, A36 and A303 corridors will be maintained, managed and improved to support development growth at Chippenham, Melksham, Salisbury, Trowbridge, Westbury and Warminster. To that end, the National Highways Strategic M4 to South Coast Study and A303 Stonehenge improvement are especially relevant"*. Notably this policy excludes reference to any strategic transport network improvements being required to support growth at Royal Wootton Bassett.

3.21 Again, it is recommended that the Infrastructure Delivery Plan and any detailed transport evidence, including any Local Plan transport assessment work and the National Highways Strategic M4 to South Coast Study, is reviewed when published.

e) **Education Infrastructure**

3.22 The site allocation policies identify other contributions towards infrastructure provision that will be required, including the provision of a new primary school (**Policy 49** – Land at Marsh Farm) and day care nursery (**Policy 51** – Land at Woodshaw). However, details of how these facilities will be delivered is lacking (see Section 4 below). Individually the scale of development proposed at each of the respective sites would not typically be expected to trigger the requirement for these items of infrastructure on a standalone basis, hence the justification for and funding of this provision is likely to depend on the total scale of development proposed to be allocated.

3.23 In respect of secondary school provision, the 'Planning for Royal Wootton Bassett' document also states that *"The secondary school is already full, but there is sufficient land to extend the school. Financial contributions would enable an extension to provide additional places"*. The site allocation policies specify that these contributions will be required.

f) **Healthcare Infrastructure**

3.24 In respect of health and social care provision, the 'Planning for Royal Wootton Bassett' document states:

*"Royal Wootton Bassett is served by two GP surgeries, subject to a severe provision gap. This is to be **partly rectified** by the internal redevelopment of New Court Surgery. Development should avoid placing additional pressure on local health services. Financial contributions are to be sought through development to ensure new residents have access to healthcare facilities, and in avoiding negative impacts on health provision."* (emphasis added)

3.25 No new GP surgery provision is proposed as part of the four strategic site allocations. It is therefore unclear how any future widening of this gap in provision as a result of new development will be rectified and whether this can be met through developer financial contributions. The Infrastructure Delivery Plan should be reviewed in detail when published.

g) **Conclusions and Recommendations**

3.26 As stated previously, the overall level of growth proposed in Royal Wootton Bassett does not appear to be unjustified. However, the delivery of this growth is predicated on a number of potential infrastructure constraints being overcome. It is therefore recommended that any additional evidence is reviewed when published at the start of the consultation period in order to confirm the **effectiveness** and **justification** of the proposed site allocations in Royal Wootton Bassett by assessing the proposed mechanisms and timescales for delivering the following:

- Water supply capacity improvements;
- Sewage treatment works capacity improvements;
- Energy infrastructure improvements (if required);

- Transport infrastructure improvements (if required), particularly those required to mitigate any potential impacts on the strategic road network, including J16 of the M4;
- A new two-form entry primary school at Land at Marsh Farm (Policy 41);
- A new day care nursery on Land at Woodshaw (Policy 51); and
- Healthcare provision (GPs)

4.0 ROYAL WOOTTON BASSETT PROPOSED STRATEGIC ALLOCATIONS

4.1 In order to accommodate a housing growth of 1,340 dwellings (including 113 completions and commitments between 2020 and 2022), the Pre-Submission Draft Local Plan 2020 – 2038 includes four proposed housing allocations sites on land adjoining Royal Wootton Bassett. These are:

- Policy 48 – Land at Marsh Farm
- Policy 59 – Land at Midge Hall Farm
- Policy 50 – Land West of Maple Drive
- Policy 51 – Land at Woodshaw

4.2 These sites were selected from a total of nine ‘reasonable alternative’ sites which were consulted on during the 2021 Draft Local Plan consultation and subsequently assessed through the Sustainability Appraisal process.

4.3 As set out in the Site Selection Methodology paper (July), this short list of nine sites resulted from a two-stage sifting process that removed land incapable of being developed without unacceptable impacts. The Sustainability Appraisal then assessed what likely significant effects development of a site would incur, both positive and negative. Those sites that performed better in sustainability terms were those that were considered likely to have fewer significant adverse environmental effects and greater social and economic benefits. The Sustainability Appraisal ranked sites by their social, environmental and economic effects.

4.4 The full Sustainability Appraisal has not yet been published, however the ‘Planning for Royal Wootton Bassett’ document states in respect of the Sustainability Appraisal outcomes that:

“The Sustainability Appraisal showed that none of the 9 sites are considered likely to have ‘major adverse effects’ whereby mitigation is unachievable. All sites had a range of negative environmental effects. All sites must be impact tested in regard to Junction 16 of the M4 to determine any necessary capacity enhancements.”

4.5 It is recommended that the full Sustainability Appraisal is reviewed when it is published, including the results of the impact testing in regard to Junction 16 of the M4.

4.6 The sites were also assessed by their performance against the ‘place shaping priorities’ for Royal Wootton Bassett. A summary of this assessment outcomes are presented in the ‘Planning for Royal Wootton Bassett’ document. All sites were considered to have weaknesses in terms of highways capacity and improvements, although it is considered that necessary mitigation measures could be introduced.

4.7 The ‘reasonable alternative’ sites located south of the railway were found to perform poorly in transport terms and there was evidence that a required bypass was not feasible at this stage.

4.8 The four preferred allocation sites were identified through a combination of assessments against the Sustainability Appraisal and the Place Shaping Priorities. However, it is unclear from the table presented on page 55 of the ‘Planning for Royal Wootton Bassett’ document (copied in Figure 1 below), the final ranking of the sites and on precisely what grounds the four preferred sites were chosen and why the five remaining sites were removed. Particularly as some of the sites (e.g. sites 5 and 8) received the exact same scoring at Stage 4 and in the SA process, and site 8 was taken forward as a proposed allocation whereas site 5 was not.

Site	Stage 4 Ranking	SA Ranking of Sites	PSP1	PSP2	PSP3	PSP4	PSP5	PSP6	Change from SA Ranking
1	5 th (2)	=5 th (-7)	P	P	P/x	x	P/x	P	No change
2	1 st (3)	=2 nd (-5)	P	P	P	x	P/x	P	↑
3	6 th (1)	=5 th (-7)	P	P/x	P/x	x	P/x	P	↓
4	6 th (1)	1 st (-4)	P	P/x	P/x	x	P/x	P	↓
5	1 st (3)	=3 rd (-6)	P	P	P	x	P/x	P	↑
6	9 th (-1)	=7 th (-7)	x	P	P/x	x	P/x	P/x	↓
7	1 st (3)	=7 th (-7)	P	P	P	x	P/x	P	↑
8	1 st (3)	=3 rd (-6)	P	P	P	x	P/x	P	↑
9	8 th (0)	=7 th (-7)	P	P/x	P/x	x	P/x	P/x	↓

Figure 1 Extract from 'Planning for Royal Wootton Bassett', Wiltshire Council, July 2023, p.55

a) Policy 48 – Land at Marsh Farm

4.9 The Strategic Housing and Economic Land Availability Assessment 2017 (SHELAA) found that the site (ref. 499) had constraints in the form of an extant planning permission and intersections with Core Strategy allocation. Overall, it was found that the site was available and suitable (had no suitability constraints), achievable for residential use, and deliverable.

b) Policy 49 – Land at Midge Hall Farm

4.10 The 2017 SHELAA assessed a site (ref. 3366) with a total site area of 51.2ha which was considerably larger than the proposed site allocation. Site constraints were identified, including an oil pipeline. Overall, the report found that the site was available and suitable, achievable for residential use, and deliverable.

4.11 This site allocation policy requires land to be reserved for a new two-form entry primary school to meet education requirements from new development at the town. However, it is currently unclear the process by which this would be funded and delivered. This should be more clearly set out to ensure this policy is effective.

c) Policy 50 – Land West of Maple Drive

4.12 Assessed as site ref. 477 in the 2017 SHELAA, the site's boundary has since been reconfigured. Although availability was unknown at the time, the site was found to be suitable and achievable but not deliverable in its initial form.

4.13 Policy 50 allocates this site as capable of delivering 70 units. It is understood that in representations made by Savills on behalf of the landowners during the previous Local Plan consultation stage, this site was deemed capable of deliver 110 units. It is unclear how or whether these representations have informed the development of the Concept Plan and indicative site capacity set out in Policy 50 of the Draft Local Plan.

d) Policy 51 – Land at Woodshaw

- 4.14 The 2017 SHELAA included a southern and northern part of land with ref. 3357 which in total had a site size of 53.2ha. Again, the site's boundary has changed over time. Parts of the site were covered by an oil pipeline and were within Flood Zone 2. Overall, the site was found to be available, suitable, achievable and deliverable.
- 4.15 This site allocation policy requires land to be reserved for a new day care nursery due to the distance to educational facilities in the town. However, it is currently unclear the process by which this would be funded and delivered. This should be more clearly set out to ensure this policy is effective.

e) Conclusions and Recommendations

- 4.16 Whilst at this stage there do not appear to be any significant oversights in the Council's approach to site selection, it is unclear from the information currently available precisely how the final four preferred site options were selected and on what grounds the other five 'reasonable alternative' sites were ruled out. It is therefore recommended that the Sustainability Appraisal and other supporting documents are reviewed when published to check that this process has been robust and **legally compliant**.
- 4.17 It is also recommended that the proposed approach to delivery of infrastructure required to support the proposed allocation sites is interrogated further when the final consultation documents and supporting evidence (including the Infrastructure Delivery Plan and transport modelling evidence) is published. This will be particularly important in respect of ensuring an **effective** approach to delivery of the following:
- Education infrastructure, including the new primary school and day care nursery;
 - Any highways mitigation measures required, including those related to mitigating impacts on J16 of the M4; and
 - Utilities infrastructure provision, in particular related to water supply capacity
- 4.18 It is also recommended that the Housing Trajectory (which sets out the proposed timescales for the delivery of each allocated site) is reviewed to ensure that this is realistic, particularly with regards to any significant infrastructure delivery which may be required (e.g. water supply and highways mitigation works), and that the overall growth strategy is **justified**.

5.0 DELIVERING THE SPATIAL OBJECTIVES – IMPLICATIONS FOR THE NEIGHBOURHOOD PLAN

a) Neighbourhood Plan Housing Requirement

- 5.1 In addition to the four proposed strategic allocations, the Draft Local Plan identifies a housing requirement for the Royal Wootton Bassett Neighbourhood Plan area of 150 dwellings.
- 5.2 Paragraph 3.49 of the Draft Local Plan states that neighbourhood plans are *“likely to provide for small to medium sites for housing development no larger than one hectare”*. It should be noted that there is no limit set in national policy on the size of sites that can be allocated within a neighbourhood plan, other than requiring that they are ‘non-strategic’.
- 5.3 Paragraph 4.268 goes on to state:
“In general conformity with the Plan, neighbourhood planning groups would be expected to look to accommodate new homes to meet housing requirements in full by identifying opportunities in their plans, where necessary, at Local Service Centres and Large Villages themselves, where new homes could meet both local needs and support the strategic role for such settlements set by the Plan.”
- 5.4 Whilst neighbourhood plans can choose to allocate sites for development, this is not a requirement. Paragraph 28 of the NPPF states that neighbourhood plans *“can”* allocate sites for development, it does not state that they have to. Paragraph 29 also states that *“neighbourhood plans should not promote less development than set out in the strategic policies for the area, or undermine those strategic policies”* and that they *“must be in general conformity with the strategic policies contained in any development plan that covers their area”* (NPPF, footnote 18).
- 5.5 It is therefore not necessary for a neighbourhood plan to allocate sites for housing in order to be in conformity with the strategic policies in the Local Plan. Indeed, Planning Practice Guidance (PPG) clarifies this by stating:
“Neighbourhood plans are not obliged to contain policies addressing all types of development. However, where they do contain policies relevant to housing supply, these policies should take account of latest and up-to-date evidence of housing need.”
(PPG, ref. ID 41-040-20160211)
- 5.6 It is recommended that the wording in paragraph 4.268 of the Draft Local Plan is amended to reflect this. In addition, the wording of paragraph 4.270 should be amended to state *“This is the total amount of homes that ~~should~~ could be met by a neighbourhood plan over the plan period from 2020 to 2038”*.
- 5.7 It should however be noted that in order to benefit from the protections of paragraph 14 of the NPPF, a neighbourhood plan must contain policies and allocations to meet its identified housing requirement.
- 5.8 The housing requirement for the Royal Wootton Bassett neighbourhood area is set out in **Policy 40**, which states that *“The neighbourhood area designation requirement is 150 dwellings”*.
- 5.9 The figure of 150 dwellings has been derived from the total housing requirement for Royal Wootton Bassett over the Local Plan period (1,340 dwellings), minus existing commitments/completions as at 1st April 2022 (110 dwellings), and minus the proposed strategic allocations (1,080). This gives a remaining figure of 150 dwellings to be delivered in Royal Wootton Bassett over the Plan period, which the Draft Local Plan identifies as the housing requirement for the Neighbourhood Plan.
- 5.10 Notwithstanding possible questions around the validity of the identified capacities of the

proposed strategic allocations (see Section 4), it is questionable whether this approach to identifying the neighbourhood plan housing requirement as just the 'leftover' amount from the strategic allocations and other commitments is justified and in accordance with PPG which states:

*“The National Planning Policy Framework expects most strategic policy-making authorities to set housing requirement figures for designated neighbourhood areas as part of their strategic policies. While there is no set method for doing this, the general policy making process already undertaken by local authorities can continue to be used to direct development requirements and balance needs and protections by taking into consideration relevant policies such as the spatial strategy, evidence such as **the Housing and economic land availability assessment, and the characteristics of the neighbourhood area**, including its population and role in providing services. In setting requirements for housing in designated neighbourhood areas, plan-making authorities should consider the **areas or assets of particular importance (as set out in paragraph 11, footnote 6), which may restrict the scale, type or distribution of development in a neighbourhood plan area.**”*

(PPG, ref. 41-101-20190509, emphasis added)

- 5.11 It is not clear that the Council has considered whether there is a suitable availability of small sites within the neighbourhood area that are not 'assets of particular importance' (i.e. excluding the Town Centre conservation area) which are capable of meeting the housing requirement figure identified.
- 5.12 The Neighbourhood Plan Working Group has undertaken a Call for Sites to inform the potential allocation of sites in the Neighbourhood Plan. The limited availability of sites identified through this process should be taken into account in the justification of the 150 dwellings requirement for the Neighbourhood Plan area.
- 5.13 In addition, on page 28 of the 'Planning for Royal Wootton Bassett' document it states that:
- “Ten per cent of the scale of growth proposed in the Local Plan suggests a baseline requirement of 134 dwellings. The neighbourhood plan is being reviewed and there is an appetite to allocate sites. The neighbourhood area designation includes Royal Wootton Bassett and the environs to the town. The neighbourhood area designation provides scope within and on the edge of the urban area to allocate suitable sites. 150 dwellings is considered appropriate for the town.”*
- 5.14 Given the potentially significant implications of a neighbourhood plan being able to meet its housing requirement (in terms of benefiting from the protections set out in paragraph 14 of the NPPF) and the relatively constrained supply of deliverable small, non-strategic sites within the neighbourhood plan area it is not considered justified for the housing requirement figure to be arbitrarily 'rounded up' from 134 to 150.

b) Settlement Boundary

- 5.15 A settlement boundary for Royal Wootton Bassett is defined on the Policies Map. This excludes sites identified as proposed allocations, but the Draft Local Plan states that settlement boundaries *“will continue to be amended and kept up to date, as and when needed during the Plan period, as development takes place and allocations are built out on the edge of settlements”* (paragraph 3.6).
- 5.16 **Policy 2** of the Draft Local Plan states that *“settlement boundaries will be kept up to date by the Local Planning Authority in accordance with the methodology at Appendix 2 of the Plan”*. Appendix 2 specifies the types of areas which are to be included within the defined settlement boundary and those which are to be excluded. It should be noted that site allocations and unimplemented permissions located on the edge of the settlement will fall *outside* the

settlement boundary.

- 5.17 Paragraph 3.6 of the Draft Local Plan also states that amendments to the settlement boundary may also be made to reflect changes brought about through the neighbourhood planning process. Therefore, any sites on the edge of Royal Wootton Bassett that may be allocated through the Neighbourhood Plan can also be incorporated within the defined settlement boundary.

c) First Homes Exception Sites

- 5.18 **Policy 79** of the Draft Local Plan provides support for First Homes Exception Schemes on sites within or adjoining an existing settlement. First Homes are homes which are discounted by a minimum of 30% against the market value, have a first sale price of no more than £250,000 and are sold to people meeting specified eligibility criteria.

- 5.19 Paragraph 5.78 states that *“To ensure that the First Homes Exception policy is effective and does not lead to multiple proposals at a settlement, the level of First Homes at any settlement is restricted”*.

- 5.20 Paragraph 2 of **Policy 79** states that schemes will be supported provided that *“the proposal is proportionate in size to the existing settlement, in terms of the number of existing dwellings, but should be no larger than one hectare in size or exceed 5% of the size of the existing settlement; and in combination with other First Homes development at a settlement does not exceed this threshold”*.

- 5.21 However, it is unclear from this wording whether ‘*other First Homes development at a settlement*’ includes any First Homes which will come forward as part of existing commitments or allocations, and over what period this threshold is assessed. This wording should be clarified to ensure that this policy is **effective**.

d) Additional Employment Land

- 5.22 **Policy 64** of the Draft Local Plan provides support for proposals for employment development on unallocated sites within or adjacent to settlements, including Royal Wootton Bassett, subject to certain criteria being met.

- 5.23 Sub-criteria (e) states that proposals will be supported where they *“lead to no unacceptable impacts on the local transport network”*. It is recommended that this wording is expanded to also include reference to the ‘strategic transport network’, which would include potential impacts on the M4.

e) Conclusions and Recommendations

- 5.24 The housing requirement of 150 dwellings for the Royal Wootton Bassett Neighbourhood Plan area does not appear to be fully **justified** on the basis of documentation and evidence currently published. This should be reviewed when all consultation documentation has been published, but on the basis of evidence currently provided it is recommended that this should be aligned to evidence and approximate capacity of sites currently being considered as part of the Neighbourhood Plan, and should not exceed 134 dwellings.

- 5.25 In respect of the settlement boundary, it should be specified by what mechanism and when this would be reviewed, to ensure it remains **effective** as a policy tool throughout the Plan period. The Neighbourhood Plan Working Group may also, in the future, wish to amend the Neighbourhood Plan area designation to ensure that it includes all sites that are subsequently allocated through the Wiltshire Local Plan.

- 5.26 The wording of the First Homes Exception policy (**Policy 79**) should be clarified to ensure this is **effective** and ensures that the number of exception sites being delivered within the town is consistent with the evidence of affordable housing need and tenure mix.

- 5.27 The wording of the Additional Employment Land policy (**Policy 64**) should be amended to include reference to impacts on the strategic transport network, to ensure this policy is **effective**.

6.0 ADDITIONAL RECOMMENDATIONS

- 6.1 Paragraph 22 of the NPPF requires that “*strategic policies should look ahead over a minimum 15 year period from adoption*”. According to the Council’s most recently published Local Development Scheme (December 2022), the Wiltshire Local Plan is not expected to be adopted until the end of 2024. Assuming there are no further delays to this timetable, the period covered by the Local Plan should extend to 2039 *as a minimum* in order to ensure it is **consistent with national policy**. However, it should be noted that any extension to the Plan period would also result in a pro-rata increase in the level of growth required to be planned for in Royal Wootton Bassett.



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