

**WILTSHIRE LOCAL PLAN REVIEW  
CWPC RESPONSE TO DRAFT LOCAL PLAN**

**1. BACKGROUND**

A Local Plan sets out a vision and a framework for the future development of an area. It is drawn up by a Local Planning Authority in consultation with its community, providing a platform for local people to shape their future surroundings. In Wiltshire, the current Local Plan is the Wiltshire Core Strategy (WCS), adopted in 2015 (<https://www.wiltshire.gov.uk/media/372/Wiltshire-Core-Strategy-adopted-2015/pdf/Wcs.pdf?m=637099399373530000>).

The Government requires every Local Plan to be reviewed at least once every five years. The Wiltshire Core Strategy was adopted in 2015 and is therefore being reviewed. This review is termed the 'Local Plan review'.

The Draft Local Plan was published for consultation on 27<sup>th</sup> September and is available here: [Current consultation \(Reg 19\) autumn 2023 - Wiltshire Council](#). We are now in an eight-week consultation period closing on Wednesday 22<sup>nd</sup> November.

Sections 2 to 6 of this paper set out the Council's proposed response to the Draft Local Plan. This has been prepared by a small task and finish group established by the Council at its September meeting. The paper builds on the interim update provided to Council on 9<sup>th</sup> October.

**2. HOUSING ALLOCATION FOR CALNE (Policies 9, 10 & 11)**

Context:

- 1,230 homes for plan period of 2020-2038 with 600 residual at 1<sup>st</sup> April 2022.
- Employment land of 5.1ha
- Neighbourhood designation of a further 100 homes in Calne area based on 10% of the overall requirement (plus 30 in Derry Hill and Studley).
- Site allocation of 2.7 ha employment land off Spitfire Road (Policy 10).
- Site allocation of 570 homes and 0.5ha employment land North of Spitfire Road (Policy 11).

Planning for Calne: [Planning for Calne July2023.pdf \(wiltshire.gov.uk\)](#)

Calne is now the 4<sup>th</sup> largest settlement in Wiltshire. There has been significant housing growth between 2006 to 2022, with approximately 120 houses per annum in each of these 16 years (approx. 2,000 houses in total). This is significantly above the average for Wiltshire (source – Planning for Calne – Wiltshire Council – July 2023). At the same time, there has been minimal infrastructure investment in the town centre or additional employment opportunities. Nearly all of this development has been on greenfield sites outside Calne's settlement boundary, most recently on the east of the town.

From the 2021 Draft Local Plan, the residual allocation for the Chippenham Housing Management Area has halved, from 9,860 residual from 1<sup>st</sup> April 2019 through to 2036, to 4,840 residual from 1<sup>st</sup> April 2022 through to 2038. At the same time, the residual housing allocation from Calne has almost doubled, from 360 to 600. Comparatively, Chippenham's residual allocation has reduced by 59%, even though the Local Plan Policy 7 allocates sites for Chippenham in excess of the defined requirement (2,525 in Policy 7 v 2,090 residual allocation).

The Wiltshire Local Plan has not taken into consideration the exceptional growth of Calne during the last 16 years, and by setting the base date as 2020, rather than 2018, a significant number of recent developments have been excluded. This has significantly contributed to the high residual balance. If 2018 had been chosen as the Base Date, with a 20-year planning period consistent with the previous iterations of the Local Plan, then the residual housing requirement for Calne would have been just 259 homes. (This has allowed for a further two years of requirement at +137 homes offset by 473 completions in 2018-2020.)

The lack of suitable employment opportunities in Calne has resulted in approx. 40% of those employed travelling more than 5km to work (source: Census 2021 when possibly more people were working from home during Covid and so this number may be an underestimate). Of these journeys the majority were by car, with only 2% being by bus (source: Census 2021). As well as significantly contributing to traffic congestion, and pollution, in Calne town centre, the majority of these journeys go via the villages surrounding Calne (Derry Hill, Hilmarton, Mile Elm, Blackland, etc) contributing to traffic issues in these villages.

Calne suffers from serious traffic congestion at peak times and air quality issues which have resulted in the creation of a statutory Air Quality Management Plan. Further development of housing in Calne is likely to exacerbate the problem, and, unless air quality impacts can be mitigated as per Policy 101, should be deferred until air quality is within acceptable limits.

The developments proposed in policies 10 and 11 (Land off Spitfire Road, Calne & Land to the North of Spitfire Road, Calne) contribute no new social infrastructure (such as shops, community spaces, primary schools, nurseries or medical centres). As Calne is now the 4<sup>th</sup> largest settlement in Wiltshire it has very little supporting infrastructure. For example, it has no Community Hospital (as exist in smaller Wiltshire towns of Devizes, Marlborough and Warminster) or public entertainment space (excluding small private halls).

Policies 10 and 11 recognise the existing use of Spitfire Road as a major route for HGVs into Hills' recycling facility and an existing skip hire business. This traffic generates a significant amount of pollution (noise, odour, HGV pollution, light pollution etc). It is welcomed that these policies ask for development proposals to put mitigation measures in place but is not specific as to what would be considered acceptable. Calne Without Parish Council has already received complaints from some current residents living near Spitfire Road due to the HGV movements in the area. Policies 10 and 11 effectively plan to place Wiltshire's main waste recycling centre and a skip hire business, in the middle of a residential area next to an AONB – this seems somewhat bizarre.

The sites identified in policies 10 and 11 are not connected to any sustainable transport links to Calne town centre. They are not on a bus route and they are not adequately integrated into the main road network.

The sites allocated in policies 10 and 11 are located on greenfield sites in-between the existing town boundary and the North Wessex Downs AONB. Such extensive development will have a detrimental effect on the view of the AONB from the west and from within the AONB looking out towards the west. Policy 11 seeks to minimise harm to this AONB, but Policy 10 does not. Both policies should be updated to specifically say that any developments in the area covered by Policy 10 and 11 should be of a scale and design to complement the views into and out of the AONB. Policy 98, "Ensuring high quality design and place shaping", should be updated to make a general statement that no development should negatively impact the view into and out of an AONB.

The land identified in policies 10 and 11 is prone to localised flooding. These policies should be updated to require any potential developer to conduct detailed flood risk assessments for both the development sites and consequential flooding elsewhere as a result of any developments.

### 3. HOUSING ALLOCATION FOR DERRY HILL & STUDLEY (Policy

Context:

- Derry Hill and Studley designated as a large village.
- Housing requirement for Derry Hill and Studley for 2020 to 2038 was 69 minus 3 completions 66, which is then reduced to 30 (33 minus completions) due to environmental constraints. This is an increase in requirement from the 2021 Draft Plan, despite the overall reduction in Wiltshire and the Housing Management Area.

Ref: [Rural Housing Requirements 2023.pdf \(wiltshire.gov.uk\)](#) – pages 42-44.

The two villages of Derry Hill and Studley are designated by Wiltshire Council as a single large village and allocated a residual housing requirement of 30 houses in the Draft Local Plan. As a large village, 66 houses are allocated for the plan period 2020 -2038. This is reduced to 33 in recognition of various environmental constraints, which is further reduced after taking into account the 3 houses completed between 2020 and 2022, resulting in a residual requirement of 30 homes up to 2038.

This is a 25% increase over the residual housing allocation of 24 houses for the village in the earlier 2021 Draft Local Plan. This increase is despite the residual housing requirement across the whole of Wiltshire being reduced by about 35%.

Derry Hill and Studley has seen very significant growth in the past 15 years. Overall, 106 new dwellings were delivered between 2007-2022, including 49 at Chapel Street and 54 at Studley Gardens, both greenfield developments outside the settlement boundaries.

This growth of 28.2% is significantly above the average for Wiltshire during this period. [Housing numbers in the Derry Hill & Studley grew from 376 in 2007 to 482 in April 2022.] Housing growth in Derry Hill has been enormous over a much longer period. Derry Hill is a village almost entirely developed by the Bowood Estate since the mid 1970s. There are just over 350 houses within the settlement boundary along with some local facilities such as a primary school, village hall, church, shop/post office and pub. Very nearly 300 of the houses have been built over multiple phases of piecemeal estate development.

In contrast to Derry Hill, Studley is a small village that has developed organically over several centuries as a linear village along Studley Lane, Old Road, Norley Lane and Studley Hill. With the exception of two small clusters of pre-war local authority housing and the recently built Studley Gardens estate of 54 houses, all the properties are of individually designed houses constructed through the past two or three centuries. There are only 69 houses within Studley's settlement boundary, which is centred around the Studley Lane/Norley Lane/ Studley Hill junction. Studley has almost no local facilities other than a Methodist chapel and hall and a pub on the A4.

The designation of these two neighbouring villages of very different character, separated by a major road, as a single large village is unique within the 68 large villages designated in Wiltshire and its justification regarded as somewhat contrived.

Whilst the two villages are just over a kilometre apart, they are divided by the A4 which was constructed in the late 1700s and separated Old Road and part of Studley Lane from the remaining part of Studley. The A4, once the main east /west road in southern England, still provides a major road link through North Wiltshire, connecting Chippenham with Calne and Marlborough to the east. It is a very heavily trafficked road with 50 & 60 mph speed limits through Studley. The A4 carries around 1700 vehicles in the peak hour with high levels of HGVs and is a significant barrier to movement between the two villages. In recent years a pedestrian crossing has been provided but considerable safety issues remain with a pedestrian killed earlier this year whilst attempting to cross from a bus stop.

The designation of Derry Hill & Studley as a large village must be regarded as somewhat contrived as it's doubtful if a large village centred on a congested and potentially dangerous crossroads on a busy major road should be the focus of increased levels of new housing.

With such high levels of housing growth over a sustained period, accessed predominantly from Studley Crossroads, it was inevitable that the Derry Hill arm of the crossroads would become congested. This was exacerbated when major housing expansion on the NW side of Calne diverted North/South A3102 traffic around the NW side of Calne tempting drivers to "rat run" through Studley Crossroads and Derry Hill, in order to avoid congestion and delays on the A3102 through the centre of Calne. Almost half the traffic now passing through the village has no origin or destination within the village.

Morning and evening peak hour congestion on the Derry Hill arm of Studley Crossroads is a major problem causing long queues and delays. The Transport Assessment by the developers of the Studley Gardens development fully analysed the junction and indicated the Derry Hill arm of the crossroads was operating at 20% above capacity at morning peak times with long queues and delays of up to 8 minutes. There is no realistic way of increasing the junction's capacity as development has surrounded and constrained the crossroads. Any further housing development in Derry Hill & Studley, even modest development, will inevitably lead to unacceptable congestion delays and safety issues, especially if it is accessed via the Derry Hill arm of the crossroads.

Traffic conditions around Studley Crossroads at the heart of this Large Village are incompatible with any significant development and are likely to be worsened by the allocation of over 2,500 new houses less than 3km to the west. The major housing site to the south of Chippenham, along with the planned link road from the A350 at Lackham to the A4 at Pewsham, will undoubtedly generate a major increase in traffic along the A4 and greatly worsen congestion, safety and environmental conditions at Studley Crossroads.

The Draft Local Plan acknowledges that Derry Hill & Studley is heavily constrained by a range of environmental factors, such as adjoining areas of priority habitat, ancient woodland, County Wildlife sites, the Bowood Park etc. The Plan has therefore made the reduction in the housing requirement of 33 houses. However, Wiltshire Council's assessment of constraints has failed to consider the major highway issues affecting Derry Hill & Studley even though Wiltshire's methodology for assessing the level of constraints includes assessing "Other Infrastructure Constraints" and refers directly to "physical infrastructure such as roads".

The Parish Council believes that Derry Hill & Studley is far more heavily constrained and lacking in suitable development sites than the Draft Local Plan envisages. The Neighbourhood Plan 'Call for Sites' received only two sites put forward, only one of which was large enough to accommodate development of the scale proposed by the Draft Local Plan. However, this site is itself dependent on access along an unlit narrow residential single track lane with no pedestrian footways.

Both sites put forward for consideration are south of the A4 and would depend for access on the congested, Derry Hill arm of Studley Crossroads to access the sites. As described earlier, generating any additional traffic onto an already over-capacity arm of the crossroads will lead to exponential increases in peak hour queues and delays in Derry Hill. This would certainly be further exacerbated by the additional traffic generated onto the A4 by the 2,525 house development to the south of Chippenham and, to a lesser extent, the 600 allocated houses to the north-east of Calne.

The point made earlier in considering Calne's housing allocation applies equally to Derry Hill & Studley. The Draft Local Plan has not adequately taken into consideration the exceptional growth of Derry Hill & Studley during the last 16 years and, by arbitrarily setting the base year as 2020, rather than 2018, the 54 houses of the recent Studley Gardens development have been ignored. By extending the base year of the plan by 4 years, a very recent large development at Studley Gardens, which was well in excess of the previous housing allocation, now gives no credit to the village in terms of previous completions. Indeed, rather than reduce the residual housing requirement, it actually increases the number of village houses and is used to justify a higher allocation.

In summary, the Parish Council believes the large village of Derry Hill & Studley, centred around a congested crossroads on a major road carrying very high volumes of traffic travelling at 50 and 60 mph warrants proper consideration of the constraints placed on development within the village. These have not been considered in the Local Plan and justify a further reduction in housing requirement to take account of the unique constraints to development due to the road and traffic characteristics in the heart of the village. Secondly, the arbitrary change in base year has unreasonably and inequitably resulted in a 25% increase in residual housing requirement for the village, whilst there has been a 35% reduction in the requirement across Wiltshire as a whole.

#### **4. POLICY 7 (LAND SOUTH OF CHIPPENHAM AND EAST OF SHOWELL FARM)**

Context:

- 5,830 homes for plan period of 2020-2038 with 2,090 residual at 1<sup>st</sup> April 2022.
- Land South of Chippenham and East of Showell Farm is allocated in Policy 7 for mixed use development of approximately 2,525 dwellings, approximately 15ha employment land, a district and local centre, 12.4ha of land safeguarded for a 10 form entry secondary school, two 2ha sites for two 2 form entry primary schools incorporating two 60 place nurseries, and two 0.3ha sites to accommodate additional 80 place nurseries.

Ref: [Planning for Chippenham July2023.pdf \(wiltshire.gov.uk\)](#)

The Council would like to formally object to Policy 7 (Land South of Chippenham and East of Showell Farm). This Policy allocates land to the south of Chippenham for a mixed use development of approximately 2,525 dwellings, approximately 15ha employment land, a district and local centre, and land safeguarded for new schools and nurseries.

The basis for this objection is that we consider that Wiltshire Council have followed an unsound process in allocating this site to meet Chippenham's housing allocation. The process is detailed in Wiltshire Council's document "Planning for Chippenham" (July 2023).

This planning document identifies eight possible sites around the town and then uses a process of multi-criteria decision assessment to assess these sites against the following six Place Shaping Priorities:

- **PSP1 Employment.** Development to provide new employment opportunities including for SMEs and start-up businesses with a strong emphasis on timely delivery to redress the existing levels of net out-commuting within the town and better enable people to live and work locally.
- **PSP2 Town Centre.** Ensuring the Town Centre will be a vibrant meeting place for the community to shop, interact and enjoy their leisure time, and a visitor destination in its own right by:
  - Serving as a centre for sub-regional public services; and retaining a mix of national traders and attracting independent traders whose presence will embed its Market Town character.
  - Conserving and enhancing the special historic character of the Town Centre.
  - Developing the Bath Road Car Park / Bridge Centre site as a mixed-use scheme which complements and enhances the Town Centre and secures completion of planned highways improvements.
  - Continuing to make improvements to Chippenham Railway Station and Cocklebury Road area to attract inward investment to this area.
- **PSP3 the River Avon Corridor.** Improved access to the River Avon valley through Chippenham as an important green and blue infrastructure corridor for the town.
- **PSP4 Accessibility.** Ensuring a network of well-connected footpaths and cycleways and connectivity for public transport across the town, to/from the town centre, and through into the surrounding countryside, so that more people can choose active travel and public transport as a means of getting around.
- **PSP5 New infrastructure.** Linking the A4 to the A350 which will provide for a more resilient local network addressing traffic congestion within the town centre.
- **PSP6 Surrounding Villages.** Respect the individual identities of villages within the landscape setting of Chippenham and their relationship to the town.

We consider that Place Shaping Priorities PSP3 (River Avon corridor) and PSP5 (New Infrastructure) have been applied in an unsound way.

**PSP3 (River Avon corridor).** Policy 93 (Green and blue infrastructure) requires major development to retain and enhance the integrity, quantity, quality and connectivity of existing on site green and blue infrastructure. The River Avon is an important blue infrastructure corridor for the area, so it would be logical for impact on the River Avon corridor to be treated as a negative criteria in the assessment, rather than as a positive.

**PSP5 (New Infrastructure).** The construction of a link from the A4 to the A350 is treated as an important place-shaping priority, without any supporting comparative impact assessment to determine whether this will be a good thing. We consider that this link is likely to result in a higher flow of traffic from west to east along the A4, having an adverse impact on congestion in the centre of Calne (which is currently covered by one of only 8 Air Quality Management Areas in the County due to vehicle emissions).

Wiltshire Council's own Transport Evidence Base (May 2023 [Wiltshire Local Plan Review Transport evidence.pdf](#)) identifies that growth from the Local Plan "is likely to increase volume / capacity (V/C) above 85% or exacerbate links with high V/C on the A4 London Road through Calne", indicating the potential for severe impact.

The inclusion of this Place Shaping Priority as a positive in the assessment is therefore not supported by the available evidence will be contravention of Policy 101 (Air Quality), which states that

*“Development proposals.....likely to exacerbate existing areas of poor air quality, will need to demonstrate that measures can be taken to effectively mitigate emission levels where air quality is a concern in order to protect public health, environmental quality and amenity.”*

Given that the selection of sites 2 and 3 in the “Planning for Chippenham” document is based on two unsound assessment criteria, Calne Without Parish Council contends that the basis for Policy 7 (Land South of Chippenham and East of Showell Farm) is fundamentally unsound.

## 5. POSITIVE CHANGES TO SUPPORT

Calne Without Parish Council recognises the hard work that has gone into developing this draft of the Wiltshire Local Plan. In particular, we would like to comment positively on a number of new and strengthened policies as follows:

**Housing.** The Council has been heavily involved in reviewing and updating the Calne Community Neighbourhood Plan. As part of this, a Housing Needs Assessment was prepared in 2022 by AECOM, which identified a strong need for affordable housing as well as the need for new housing to be built to standards of adaptability and accessibility, given an aging population. The Council therefore welcomes and supports the following policies:

- Policy 76 Providing Affordable Homes – updates current Core Policy 43. The Council supports the extension of the 40% Affordable Homes standard to cover all of Wiltshire, including the Calne Area.
- Policy 77 Rural Exception Sites – updates current Core Policy 44. The Council supports the increase in the upper limit from 10 to 20 homes.
- Policy 78 Meeting Wiltshire’s Housing Needs – the Council supports the inclusion of defined standards for adaptability and accessibility, significantly strengthening current Core Policy 45.
- Policy 79 First Homes Exception Sites – the Council supports this new policy supporting First Homes Exception sites.
- Policy 80 Self and custom build housing – the Council supports this new policy, making provision for plots for self-build and custom-build homes on larger developments.

### **Design.**

- Policy 98 Ensuring High Quality Design and Place Shaping. The Council has participated in the development of a local Design Guide for the Calne Community Area and supports the requirement of this Policy to have regard to Local Design Guidance.

**Employment.** The Council welcomes and supports the following policy:

- Policy 64 Additional Employment Land – strengthens current Core Policy 34. The Council supports the inclusion of additional clauses detailing presumption of support for farming and for the diversification of rural businesses.

**Transport.** The Council welcomes and supports the following:

- Policy 70 Sustainable Transport – the Council supports the development of current Core Policy 60, specifically the greater emphasis on walking, cycling and public transport.
- Policy 71 Transport and New Development – the Council supports the strengthening of current Core Policy 61, specifically the requirement for provision of EV charging infrastructure and the specific requirement for new developments to have suitable & safe access to the highway.

**Climate Change.** In April 2021, the Council declared a Climate Emergency, recognising the impact on the environment within the Parish, and beyond, of climate breakdown. As a statutory consultee on

planning applications, we have been frustrated to see applications for new homes continuing to be put forward without the incorporation of measures to mitigate and adapt to the impacts of climate change. We therefore welcome and support the following policies:

- Policy 4 Addressing Climate Change – new policy which requires development proposals to support a move to carbon neutrality and adaptation to climate change.
- Policy 85 Sustainable Construction and Low Carbon Energy – significant strengthening of current Core Policy 41 setting a clear operational net zero carbon standard for new homes.
- Policy 87 Embodied Carbon – new policy setting a clear target for embodied carbon for new developments.

**Environment.** The Council similarly supports measures to mitigate the impact of new development on the environment. We therefore welcome and support the following policies:

- Policy 88 Biodiversity and geodiversity – strengthening of current Core Policy 50 with specific requirements for the inclusion of features such as swift bricks and hedgehog highways, which will make a difference for wildlife while adding little capital cost.
- Policy 89 Biodiversity net gain – new policy requiring +20% Biodiversity net gain from new development.
- Policy 90 Woodland, hedgerows, and trees – new policy providing for the retention and enhancement of Wiltshire’s woodlands, hedgerows, and trees.
- Policy 93 Green and Blue Infrastructure – extension of the current Core Policy 52 to include Blue Infrastructure.

**Community, Health & Wellbeing.** The Council welcomes and supports the following policies:

- Policy 81 Community Facilities – strengthens current Core Policy 49 to include a presumption of support for the development of new community facilities.
- Policy 83 Health and Wellbeing - new policy on Health & Wellbeing, requiring new developments to have access to, or be accessible to green and blue infrastructure, including community gardens, community orchards and/or allotments.
- Policy 84 Public Open Space and Play Facilities – new policy requiring provision for public open spaces and, where appropriate, play facilities.

**Water Management.** The Council welcomes and supports the following policies:

- Policy 95 Flood Risk – the Council supports the strengthening from Core Policy 67 of requirements around Flood Risk Assessments, Surface Water Drainage Strategies and Groundwater Assessments, the emphasis on sustainable urban drainage systems (SuDS) and the inclusion of clear design standards.
- Policy 96 Water Resources – the Council support the strengthening of Core Policy 68 with a clear target on water efficiency and measures to mitigate the impact on resources in this water-stressed area.

**Miscellaneous.**

- Policy 92 Conserving and Enhancing Dark Skies – the Council supports this new policy to conserve dark skies within Areas of Outstanding Natural Beauty.
- Policy 94 Wiltshire’s Canals and the Boating Community - with the line of the Wilts and Berks Canal forming the northern boundary of the Council’s Pewsham Ward, the Council supports the strengthening of Core Policy 53 to support the restoration of the canal.

## 6. OTHER COMMENTS

The current practice of green spaces, communal spaces and play areas in new developments being the responsibility of residents to maintain through estate management companies is inefficient and



places an added financial burden on residents, including affordable housing residents. This is inequitable, as residents are simultaneously funding the upkeep of public spaces in established residential areas through their council tax. Wiltshire Council should instead be taking on the maintenance of open spaces in exchange for a contribution from the developer.

Policy 76 on Affordable Homes should also make provision for the supply of homes for Social Rent, to ensure that homes remain within the reach of the poorest in society. ("Affordable" rents are linked to market value, whereas "Social" rents are linked to income.) It may be possible to offer a reduction in the %age of overall "affordable" housing in a development, if a proportion is provided at social rental levels.

The current unimaginative and generic design of new developments has led to Calne and surrounding areas losing its character and sense of place. Core Policy 57 from the 2015 Strategy "Ensuring high quality design and place shaping" attempts to stop this. Despite this obviously being unsuccessful, when looking at the quality of recent developments, the bulk of this policy has been copied into proposed Policy 98 with the same name. The new Design Guide should be rigorously enforced to limit this in the future and the wording of Policy 98 improved to make it enforceable.

Policies 10, 11 and 98 should reference the Calne Design Guidelines and Codes which has been formally adopted by Calne Without Parish Council.

It is welcomed that strategic bus routes are supported in Policy 75 "Strategic transport network". It is assumed that the 55 route from Swindon to Chippenham, via Calne & Derry Hill/Studley, fits into this category and is supported, but there is no mention of non-strategic bus routes, such as the 42 and 43 routes from Calne to Marlborough and Heddington. These routes are critical to many residents in villages who either wish to travel to Calne to connect with the strategic bus route or wish to travel for other reasons. It should be noted that there are no direct bus routes from the Calne area to any local hospitals.

Many new developments are not linked to sustainable transport networks (e.g. footpaths and cycleways) and are a considerable distance from public transport stops. This leads to an over-dependence on people using private cars.

Policy 82, Housing in the countryside, is generally supported but it is felt that an additional criterion should be added. Infill development of individual, or semi-detached, properties should be allowed in a village on the site of a previous property which has now been lost.

Policy 2, Delivery strategy, in para 3.26 says that infill proposals in small villages will be supported consistent with their character. The practice of allowing development within gardens which results in very small plot sizes, in terms of rural norms, should not be supported.

Policy 2 in para 3.23 states that its objective is to provide new homes to meet local needs. There are numerous examples of small semi-detached or terraced houses being "knocked through" to make one much larger, much less affordable, home. This has the effect of reducing the rural housing stock and reducing the number of smaller, and therefore cheaper, houses. In general, this practice should not be supported.

The draft Local Plan makes many references to "acceptable mitigation" in relation to noise, air pollution, protecting the AONB's etc but doesn't explicitly say what is meant by "acceptable". It would be very useful to residents, parish councillors, local authority planners, developers etc to understand what is acceptable and what is not.

## **7. RECOMMENDATION**

It is recommended that the Council endorses this paper and authorises the Parish Clerk, supported by the Task and Finish group, to submit the Council's responses to the Local Plan Review through Wiltshire Council's online consultation portal.

Cllr John Barnes

Cllr Doug Price

Cllr Ioan Rees