

**Comments on the Draft Wiltshire Local Plan 2020-2038**  
**Peter Deck – Planning Sub-Group PCAP**

2. As a retired Pewsey Parish councillor and Chairman of the Planning Committee I wish to comment on the Draft Local Plan and Consultation process, these are offered below.

I would first like to say that the range and the amount of detailed work that has gone into preparing this draft is appreciated and the result, with suitable amendments, will produce a workable plan for the period to 2038.

I also think that your policy to gather up all saved policies from a variety of other (old) plans and include them in this draft as necessary is sensible and will save time and trouble for users.

3 Comments on the Consultation:

a. The ‘Drop In’ event held at Marlborough Library was intended to inform anyone living in the Swindon HMA and was not exclusive for those living in Marlborough. On attending the event I was surprised and disappointed that there was no information about Pewsey as one of the area’s Service Centres. Neither was there a copy of the Rural Housing Requirement paper dated Sept 23 (See below). Officers attending were unable to offer any information apart from that pertaining to Marlborough. This was a poor way to inform those living in other settlements in the area.

b. The Wiltshire Core Strategy (WCS) at Policy 18 covered planning policy as it concerned Pewsey; similarly this policy advice was repeated in the Local Plan Pre-Submission Review (Cabinet version July 2023). It was therefore a surprise that this information did not appear in the LP draft version.

It was not until the paper entitled Rural Housing Sept 2023 was eventually tracked down that this essential information was found. No cross reference to this paper was found in the LP Draft. This has made the acquisition of future planning policy for small villages both large and small and Service Centres in rural areas unnecessarily difficult. Service centres at the very least deserve their own policy information in the Local Plan as was the case in the WCS.

c. The ‘Statement of the Representations Procedure and availability of documents’ paper handed out at the Drop-In event sets out how to respond to the consultation and a form to do this was provided. This is fine if ones comments come under one of the three headings provided ie. Legally compliant, it is Sound and Complies with the duty to co-operate, but that is not necessarily the case and that is why I am offering my comments in this way. It may be easier to receive comments under three headings but I believe that consultees should not be restricted.

I might add that to read and digest the Draft plan and all its supporting documents runs into some hundreds if not thousands of pages and is not an easy task for the average person to undertake. Not everyone will have a computer or the time to spend in a library ploughing through these papers to try and find the passages that applies to them or their community. Clear references and indexing to make such tasks easier for the layman is therefore essential.

4. Comments on the Draft Plan:

a. The draft plan refers to and is advised by several other plans for example the Energy Plan and Transport Plan but not the WC Freight Strategy which would seem an omission. The movement of freight around the County is an important facet of future planning which any local plan would be expected to address. It is not easy to understand how Pol 70, bullet point five can be achieved

without an up-to-date Freight Plan/Strategy. It might be claimed that the plan's soundness could be jeopardised if it does not refer to current and future movement of freight.

b. Housing:

i Policy 76 allowing 10 or 5 houses to be built without the provision of affordable housing (AH) is not agreed. Developers will, naturally, apply to build these amounts or less to avoid building AHs on small sites. This happened on at least two occasions in this parish on sites that could easily have accommodated more dwellings, so no AHs were forthcoming. Even a small number (1 or 2) of AHs in rural communities is most useful. Developers should not be given the opportunity to avoid providing this contribution.

ii The Core Strategy rule on Rural Exception sites was for 10 houses outside a settlement boundary as long as they were affordable allowing one to be at market value to ensure viability. Judicial results later increased the one to two. The draft LP greatly increases the ratio of AH to Market value which will significantly encourage applications outside the Limit of Development (LoD). No reasons are given for this change of policy which will exacerbate bids to build outside boundaries set in the LP and Neighbourhood Development Plans. The Core Strategy policy should be retained.

iii Paragraphs 3.36 – 3.39 concern Windfall Sites which are referred to as 'significant components of land supply' and that they will 'come forward' in years to come. It is also confirmed that past evidence shows a certain consistency in the number supplied so it would seem entirely possible to calculate an average and so predict future supply. It is therefore suggested that this is done, as in other LPs in the country, thus providing significant additional numbers to the future housing numbers forecast.

c. Comments by paragraph:

Fig 3.1 These maps omit Bedwyn station by name so should be amended.

3.47 It is appreciated that planning language is not always easily understood especially this paragraph and in particular the last sentence. Suggest rewrite.

4.270 The Broomcroft Rd site was built out some years ago.

5.251 & Policy 100 It would be helpful to include WC's views on the proposed A303 tunnel to avoid the Stonehenge WHS and whether this project is supported, or not.