

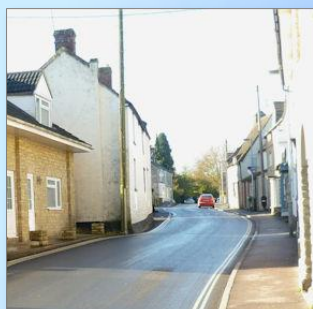


Purton Neighbourhood Plan

Regulation 14 Statement of Consultation

December 2017

This statement details the consultation on the latest version of Purton's draft Neighbourhood Plan (June 2017) which was undertaken during the six-week period commencing Monday 3 July 2017.



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Introduction: Process of the Neighbourhood Development Plan

- 1.1 In the autumn of 2011, Wiltshire Council obtained funding from the Government's "Front Runners"¹ scheme to trial the neighbourhood planning process in four different geographical areas across the county. These comprised Malmesbury, Sherston, Warminster and the Royal Wootton Bassett and Cricklade Community Area.
- 1.2 The Royal Wootton Bassett and Cricklade Community Area has twelve parishes though some parishes within the community area declined to take part or, as with both Cricklade and Royal Wootton Bassett, withdrew from the arrangement at an early stage. The seven rural parishes which stayed in the arrangement formed the North Eastern Wiltshire Villages (NEW-V) Neighbourhood Area which was approved by Wiltshire Council in May 2013. Those parishes were Broad Town, Clyffe Pypard, Lydiard Millicent, Lydiard Tregoze, Lyneham and Bradenstoke, Purton and Tockenham.
- 1.3 The early consultation was across all seven parishes managed by Common Places² during the winter of 2012-2013 which included the parish of Purton. It was from this consultation informed by previous consultations for the Purton Housing Needs Survey January 2012 and the Purton Parish Plan 2014 that the Neighbourhood Development Plan was developed for the parish of Purton.
- 1.4 However in January 2016 Purton Parish Council decided to take its draft neighbourhood plan forward separately. In February 2016 the Parish Council applied to Wiltshire Council for the area to be re-designated and consultation commenced 26 June to 10 August 2016. On the 5 December 2016 the designation of the Purton Neighbourhood Area was approved. In October 2016, the first draft of Purton's Neighbourhood Development Plan (the Plan) was published on the Parish Council's website and sent to Wiltshire Council for comment.
- 1.5 The Plan was updated from the comments received ready for an 'informal'³ consultation open to all residents at the beginning of 2017 with walk-in sessions on the evening of Wednesday, 25 January and the afternoon of Sunday, 5 February at the Village Hall in the centre of Purton. These two events were publicised through the parish council website, the parish magazine, banners in the village, a leaflet drop across the parish and within local networks.
- 1.6 The Neighbourhood Plan was updated reflect the comments received ready for the Regulation 14 Consultation in accordance with the Neighbourhood Planning (General) Regulations 2012 commencing June 2017.

¹ Originally the Scheme was called "Vanguard" but the name was subsequently changed to "Front Runners".

² A planning consultancy, based in Devon, appointed by Wiltshire Council

³ An informal consultation rather than the formal consultations required by the Neighbourhood Planning (General) Regulations 2012.

How was the Consultation undertaken

- 2.1 The Regulation 14 Consultation commenced on Monday 3 July and ran for six weeks until Monday 14 August 2017.
- 2.2 The consultation was advertised in the Swindon Advertiser and the Wiltshire Gazette and Herald, on the Parish Council Website, with banners outside the Library, on the railings at the Pavenhill Shops and at the entrance to the Purton War Memorial and Village Centre.
- 2.3 A leaflet drop to all residents across the parish was undertaken including the new developments at Mouldon View and Ridgeway Farm⁴ at the eastern edge of the parish adjoin the borough of Swindon. The leaflets were delivered by Royal Mail to ensure they were delivered to all households.

Neighbourhood plan has opened to consultation

PURTON is moving forward with its Neighbourhood Plan, according to the chairman of Purton Parish Council.

Cllr Ray Thomas said: "The Localism Act has given local communities the opportunity to develop a shared vision for their Neighbourhood Area and to shape the development and growth of our parish.

"We have worked hard to develop our Neighbourhood Plan to reflect the views and needs of our parishioners. This Plan has now reached the stage where we are now to undertake the pre-submission consultation in accordance with Regulation 14 of the Neighbourhood Planning (General) Regulations 2012."

The consultation will be open to all parishioners and all other parties who have an interest in Purton parish. It will run for six weeks until Monday, August 14.

The plan and supporting documentation can be obtained from the parish council website: www.purtonparishcouncil.gov.uk/Neighbourhood-Plan.aspx. Hard copies can be obtained from Purton Parish Council parish clerk (clerk@purtonpc.eclipse.co.uk) on request or may be viewed in Purton Library or the village hall.

Comments on Purton's Neighbourhood Plan can be made using the Feedback Form on the parish council's website and emailed to the parish clerk at Purton Parish Council (clerk@purtonpc.eclipse.co.uk) or alternatively by post to Purton Parish Council, Village Hall, Station Road, Purton, Swindon SN5 4AJ.



FINALLY, IT'S HERE! Purton Neighbourhood Plan

Following the more informal consultation a few months ago, various changes have been made and the Plan is now ready for its formal consultation. All changes and reasons are listed in a separate document entitled, Second Statement of Consultation.

Purton Neighbourhood Plan 2017 – 2026 deals with issues such as Employment, Transport, Environment, Facilities and Housing.

Where is it?

- Purton Parish Council web site
www.purtonparishcouncil.gov.uk/Neighbourhood-Plan.aspx
- Electronic copies can be obtained by email request from the Clerk to the Council, Deborah Lawrence clerk@purtonpc.eclipse.co.uk;
and
- Hard copies may be viewed in the Library, Village Hall, Purton

How do I comment?

- By email to: Clerk to the Council, Deborah Lawrence
clerk@purtonpc.eclipse.co.uk;
- By hand to the Council Office at the Village Hall, Purton; and
- By post to: The Clerk, Council Office, Village Hall, Purton, SN5 4AJ

When by?

No later than 17:00 on Monday, 14 August 2017

We want to know what you think...thanks!

Purton Parish Council

⁴ Leaflets were only delivered to houses in Ridgeway Farm that were occupied as of the beginning of 2017, the estate was, and is, still under development.

- 2.4 Emails with a copy of the Neighbourhood Plan were sent to all the residents who had provide their email addresses when they had attended the Informal Consultation which was held on the 25 January and 5 February 2017 at the Village Hall in Purton to advise them of the consultation. The consultation was also advertised by some residents with their own community networks.
- 2.5 Letters together with a copy of the draft Neighbourhood Pan were also emailed to the relevant statutory bodies, the town and parish councils that border the parish, the Unitary Authorities of Wiltshire and Swindon, and to developers who are known to have an interest in the parish of Purton, they included:
- *The Parish and Town Councils of Blunsdon Parish Council, Braydon Parish Meeting, Brinkworth Parish Council, Charlton Parish Council, Cricklade Town Council, Haydon Wick Parish Council, Leigh Parish Council, Lydiard Millicent Parish Council, and Minety Parish Council,*
 - *The Unitary Councils of Wiltshire Council (Neighbourhood Planning) and Swindon Borough Council (P Smith).*
 - *The statutory bodies included the Homes and Communities Agency, Natural England (consultations), The Environment Agency, David Stuart Historic Places Adviser South West of English Heritage, Paul Harwood of Network Rail Infrastructure Limited, Town Planning Western at Network Rail, Rachel Sandy of the Highways Agency and Martin Cleverly Estates Adviser of NHS England, Developer Services of Southern Water, Developer Services of Thames Water and Planning Liaison of Wessex Water.*
 - *Developers included Mark Hewett of Intelligent Land, Steven Harris of Wainhomes (Northwest), Christopher Roberts of Turley Homes (on behalf of Hills Homes), Nick King of Hills Homes, and Taylor Wimpey.*
- 2.6 The “draft Purton Neighbourhood Plan” with all supporting documentation including “Purton ~ Planning for the Future” were available on Purton Parish Council website. Hard copies and electronic copies of the documentation were available from the Parish Clerk from the Parish Council Offices and hard copies were also available in the Purton Library.
- 2.7 Though there were only seven responses from local residents compared to the 103 previously from the “Informal” consultation undertaken at the beginning of the year, this was further reinforced by the large response received both from the statutory bodies and particularly from developers. They comprised:
- *Wiltshire Council and Lydiard Millicent*
 - *Natural England, Historic England, Network Rail, Environment Agency, Southern Water and Highways England*
 - *Land and Property Planning, Pegasus/ Hannick Homes, Gladman, Emery Planning for Wainhomes (South West), Turley on behalf of Hills Homes and Turley on behalf of Taylor Wimpey*

Issues Raised and Outcomes

All the responses received during the consultation period have been reviewed and the complete list of all changes identified to the Plan is detailed in the Annex below.

Of the 52 items identified in the annex, the key points raised were:

- The use of the term “resilience” used in the supporting document “Purton ~ Planning for the Future” was challenged as not having any grounding in the statutes, policies and guidance that a Neighbourhood Plan must have regard to. This has been amended to sustainable development with its associated arguments to bring it in line with the statutes, policies and guidance for a Neighbourhood Plan.
- Developers expressed concern with the site selection methodology and the analysis and ranking of sites undertaken in Annex 8 of the supporting document “Purton ~ Planning for the Future” and challenged the criteria and weightings used in the analysis and the apparent arbitrary level used for accepting if sites were suitable/sustainable.
 - *Sites are ranked against each other and not a set level, text has been changed to clarify.*
 - *Whether a site is more or less sustainable if it within or outside the settlement boundary was challenged and it has been removed from the analysis.*
 - *The criterion Potential Added Value was also challenged as being highly subjective and difficult to evaluate objectively compared to the other criteria used. This has been changed to a revised criterion “Community Enhancement” based around the concepts from the Taylor Review of Rural Economy and Affordable Housing 2008.*
 - *The weighting for the distance to the dentist challenged as being too high and has been reduced from 3 down to 2.*
 - *For clarity, changes were made to criterion names: “Potential to impact view” changed to “potential to impact sensitive skyline or view”; “Potential to affect character or settings of any listed building or heritage assets” changed to “Potential to adversely affect the character or setting of heritage assets”.*
- Suggested change reference to “great crested newts, bats or deer” in Policy 12 of the draft Neighbourhood Plan and expand to “...assess the potential for protected and/or notable species and species of conservation concern...” to be more inclusive.
- Also in the table of criterion in Annex 8 of Purton ~ Planning for the Future used to rank sites, change the criteria “Known, or likely to have badgers, great crested newts, bats or deer” to “Known, or likely, to have protected and notable species including badgers, great-crested newts, bats or deer”.
- The developers who have interests in the village were keen to promote their sites in the consultation and all challenged the ratings their sites had been given. Whilst the generic issues they raised were dealt with as above, the site-specific points were not

taken forward as there was a conflict of interest unless a specific error in the ranking had been identified.

- Policy 12 contains the condition that all sites within the settlement boundary should be brought forward before land outside the existing settlement boundary. It is recognised that as circumstances change over the plan period, this may prevent any development outside the settlement boundary to meet the local housing needs. This restriction has been removed.
- Suggested that the condition in Policy 12 to “protect and preserve biodiversity and landscape setting of the village in accordance with Wiltshire Core Strategy Core Policies 50 and 51” be extended to seek stipulate opportunities for ecological enhancement/gain will be sought. Similarly in Policy 13.
- Suggested it would be appropriate to include a dedicated biodiversity/ecology and nature conservation policy in the chapter on Environment to encapsulate the overarching environment goal and aims that pertain to ecology and nature conservation and clearly setting out the objective to protect nature conservation sites and biodiversity, and to seek opportunities to enhance ecology.
- Suggested to include in the chapter on Environment to add an additional Aim/Objective *“to identify and implement ecological enhancements wherever possible, such as part of proposed developments, in order to work towards a net gain for biodiversity rather than just to protect existing ecological features/sites.”*
- Concern expressed with the term “area of search” used in Policy 13 to define the land of Restrop Road comprising site 470 and part site 440. If this land as a whole was designated for development it has the potential for in excess of 90 dwellings whereas only 40 dwellings are required in the Plan. The objective was to enable developers to identify a site for 40 dwellings within this area of land. Word change to “Land indicated on Map 12 is identified as an area to accommodate a site for up to 40 (*sic*)” dwellings to clarify.
- Issue of clarity of the annotation of Map 5 in Policy 4 as to whether the policy applies to some or all the areas shown in the map. Also concern that the rational for the proposed designation to be protected in Map 5 was unclear and lacked published evidence as to how it was created. Map 5 in the Plan changed to remove the darker shade of green representing the escarpment and replace with the contour lines showing the escarpment around the north and west of the village. The evidence used to define rational for the designated area together with the photoviews of the sensitive skyline and views has been added to the supporting document “Purton ~ Planning for the Future as Annex 12 (Distinctive Landscapes and Views).
- Observation that the proposed extension of the cemetery will need a full hydrogeological investigation and assessment to determine the suitability of the site and to prevent any pollution of the underlying groundwater.

- Suggested inserting into Purton Policy 11 a requirement that new residential development should, where possible, include safe cycling and walking routes not only to the village centre but also existing leisure and play facilities.
- Observation that the Plan and the supporting document “Purton ~ Planning for the Future” had not used the data from the up-to-date Housing Land Supply Statement March 2017. This has been corrected and the updated figures indicate that zero (0) homes still need to be identified in the Royal Wootton Bassett and Cricklade rural area compared to the 63 identified in the draft Plan. *(This number is expressed in the Wiltshire Core Strategy as ‘approximately’ therefore the additional homes proposed in the draft Plan remains appropriate for the village.)*
- It is argued that using council tax banding or housing completions in Annex 4 of the supporting document “Purton ~ Planning for the Future” does not actually provide any useful analysis in respect of a locally relevant housing mix and cannot be considered as credible evidence for the purposes of Core Strategy Policy 45. However the data in Annex 4 shows the Purton has a disproportionately larger-size houses than in the rest of Wiltshire and overall nationally, so it does provide credible evidence. However for clarity added house sizes/ mix from the 2011 census data showing the house sizes by number of bedrooms in Annex 4.
- Noted that stipulating retaining existing mature trees during the development process does not *(in itself)* ensure that mature tree habitat is retained. Add reference to retain existing mature trees and hedgerows in accordance with the NWLP 2011 saved policy NE14 Trees and the Control of New Development.
- Noted that as the ‘Lifetime Homes Standard’ (or its equivalent standard now i.e.: M4 Building Regulations - accessible/adapted units for older people or people with disabilities) has been replaced, it makes it difficult to achieve or expecting anything like LTHS and is really only achievable when linked to WCS CP46. Added Policy CP 46 to Policy 12 and 13.
- Observation that while Policy 2 commitment to using CIL receipts for specific projects provides clarity on how certain transport issues are to be addressed, land use policies relating to traffic management are, however, difficult to phrase and needs to focus on the proposal rather than the delivery mechanism. Wording in Policy 2 to be reframed.
- Concern that these sites are both affected by surface water flood risk, according to the Flood Map for Surface Water, though it is not mentioned in Policy 1. Neither of these sites is known to flood but condition added that any proposals for development on this land shall demonstrate how flood mitigation measures would prevent the flooding of this land and any other land that would be affected by the development.
- Suggested modifying Policy 3 on Footpaths to protect the quality/attractiveness of public rights of way (rather than just retaining them), and seek compensation measures to improve rights of way if that is not possible.

All the policy numbers above relate to the June 2017 version of Neighbourhood Plan which was used for the Regulation 14 consultation. In making the respective changes to Purton's Neighbourhood Plan, two new policies have been added and they have changed policy numbers. The changes between the June 2017 version and the updated December 2017 are shown below.

Purton Neighbourhood Plan			
June 2017		December 2017	
Policy 1	To enhance the prospects for local employment	Policy 1	To enhance the prospects for local employment
Policy 2	To improve road safety	Policy 2	To improve road safety
Policy 3	Footpaths	Policy 3	Footpaths
		Policy 4	Ecological Enhancements
Policy 4	To protect key local landscapes	Policy 5	To protect key local landscapes
Policy 5	Settlement Identity	Policy 6	Settlement Identity
Policy 6	Flooding	Policy 7	Flooding
Policy 7	Pavenhill Shops	Policy 8	Pavenhill Shops
Policy 8	Facility for the elderly	Policy 9	Facility for the elderly
Policy 9	Cemetery Extension	Policy 10	Cemetery Extension
Policy 10	Allotments	Policy 11	Allotments
Policy 11	Play Areas, Leisure and Open Space	Policy 12	Play Areas, Leisure and Open Space
Policy 12	Development Principles	Policy 13	Development Principles
Policy 13	Development outside settlement boundary	Policy 14	Development outside settlement boundary at Restrop Road

Annex: Purton Parish Council Draft Neighbourhood Plan Regulation 14 Consultation

	COMMENT	RESPONSE	NP MODIFICATION
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RESIDENTS


Resident 1 [REDACTED]

1. Generally we very much support the Neighbourhood Plan. It is a very thorough detailed set of documents and should materially influence future development plans to the good.	This is appreciated	
2. We offer some specific comments, mainly re Housing Policy		
<ul style="list-style-type: none"> Para 2.13 (p12) lists “important heritage sites” but omits College Farm house which is arguably the most important in the village, being of national importance. It was originally owned by the Hyde family, Edward Hyde becoming Earl of Clarendon and a highly significant figure in the national life of the 17th century, and grandfather to two Queens of the United Kingdom. It became College Farm House in 1736 when it was acquired by Worcester College, Oxford. The College Farm site is always shown in Gothic type on Ordnance Survey maps, a further indication of its importance. 	Noted and appropriate changes made	Add College Farmhouse to the list of Heritage sites with Restrop House which is also a Grade II* heritage site. Add Earl of Clarendon to item 2 in Site 66 in Purton ~ Planning for the Future.
<ul style="list-style-type: none"> Para 3.10: College Farm House needs to be added to the list of heritage sites under the third bullet point 	No 3.10 is about Environment not Heritage	None needed.
<ul style="list-style-type: none"> Para 3.15 in the box on Purton Policy 12 refers to “Derelict Cottage Farm” and that name appears often throughout the document. The farm has never been called that and has been College Farm for the best part of 300 years and it should be so described on every occasion. The capital ‘D’ in derelict 	Site name used for continuity as it is used in Public Planning Documents (SHLAA).	None needed.

	COMMENT	RESPONSE	NP MODIFICATION
	<p>unnecessarily emphasises what is certainly an unhappy state. A lower case would be kinder!</p> <ul style="list-style-type: none"> Neither in Para 3.14 nor in the section on The Environment is there any reference to the need for gardens in future housing developments. <p>3. Purton Planning for the Future. In the Site Analysis of Part Site 66, para 6 refers to local bio-diversity and specifically to the possible presence of bats. We ourselves have never seen any in 30 years but what we do see reasonably regularly are visiting deer – up to four at a time – and that should probably be included.</p> <p>In Appendix 8 of the January 2017 Statement of Consultation the third bullet point suggests a future development of College Farm as an alternative to housing. It is a suggestion that would have our wholehearted support.</p>	<p>Domestic Gardens have not been included. Core Policy 52 Green Infrastructure cites domestic gardens but does not require that they are provided. Unable to find any relevant planning policy to support inclusion in the Plan</p> <p>Noted.</p> <p>One of the original consultation comments made but not considered practical to take forward.</p>	<p>None at this time.</p> <p>Add to Add deer to item 6 in Site 66 in Purton ~ Planning for the Future.</p> <p>None needed.</p>

Resident 2

	<p>For consideration of inclusion in the final Purton Neighbourhood Plan.</p> <p>Site 86 (Purton ~ Planning for the Future) OS No 9937 site for up to 3 houses.</p> <p>The land shown in yellow is located south of Locks Lane, adjacent to the existing development boundary shown on the attached Plan. Should the site be included for development it would move the existing boundary to Locks Lane being a more definable and natural boundary. Development of the site would have little impact</p>	<p>This site has been assessed against all other sites, it is outside the settlement boundary and it ranked low against other sites so was not included.</p>	<p>None needed.</p>
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	COMMENT	RESPONSE	NP MODIFICATION
	<p>on the surrounding properties with regard to flooding. The upgrading of the sewer across the Common has increased capacity far beyond what this site would produce. The development would not have adverse visual impact as the land is in effect back-yard to the existing properties on the Common. The proposal would be to build Cottage type properties to blend and be in keeping with the existing houses.</p> <p>Site 86: "Land around Locks Lane"</p>  <p>The Site is located on the south side of Locks Lane where it joins which joins almost at the far end of Witts Lane. The gross area of the site is approximately 0.11 hectare and has the potential to accommodate up to 3 houses²¹.</p>		

Resident 3

	<p>Policy 6: Flooding</p> <p><i>Potential new development should not be excluded on land at the bottom of Purton, either side of the Swindon to Gloucester Railway Line as it is not identified as a Flood Zone by the Environment Agency, with negligible to zero risk of flooding.</i></p>	<p>Whilst the sites either side of the Swindon Gloucester railway line are in Flood Zone 1, they do not need a flood risk assessment if the site is smaller than one hectare and is not affected by other sources of</p>	<p>None needed.</p>
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	COMMENT	RESPONSE	NP MODIFICATION
		flooding though the area is affected by surface water flooding as defined by the Environment Agency.	
	<p>Policy 4: Protect key local landscapes</p> <p><i>While agreeing with the ambition in the Draft plan, “to seek opportunities for landscape, recreational and ecological gain with minimal environmental impact of new developments”, views from the much-valued escarpment that buttresses the village landscape would not be unduly spoiled development, for example, the existing housing estate adjacent to area 1120, Jubilee Estate is well established, and has existed in Purton for many years.</i></p>	The extension of Jubilee Estate towards the lower end of the escarpment, development of Site 1120 Jewels Ash (particularly the whole site would extend further towards the escarpment).	None needed.
	<p>Policy 7: Pavenhill Shops + 5: Settlement Identity</p> <p><i>While improvement is welcome, exclusively improving and expanding the Pavenhill shops would be to model the artificiality of modern housing estates, where houses are built, along with a village centre, (notwithstanding the fact that the Pavenhill site is more Southern than central in the village).</i></p> <p><i>This appears to be counter to the ideas expressed in the Neighbourhood Plan ‘Issue 6: Sense of Place’. Purton is a long established village that lost many of the shops located along its High Street in the 1980’s and 90’s when, amongst other changes, three Butchers became one and the Pharmacy was relocated from the lower part of Purton High Street to the Pavenhill location.</i></p> <p><i>Focussing solely on developing the Pavenhill site makes access to the proposed facilities difficult for residents in the majority lower part of the village, given the length and relatively steep gradient of the village. This in turn forces use of motor transport and adversely affects the intension of policies 2 and 8, (maybe more).</i></p> <p><i>The village would benefit from an approach that is more sympathetic to it, and</i></p>	<p>Retail competition from Swindon has, over time, adversely impacted the number of shops remaining in the village and so there is a need to protect and enhance what is left.</p> <p>There is sympathy with the comments but have to work with what there is. Developers will only build shops in the village if there is a need and it is profitable and there was a suitable location. It would be nice if the Co-op would make up its mind after 2½ years over the existing shop in Lower Square.</p>	None needed.

	COMMENT	RESPONSE	NP MODIFICATION
	<i>some out-of-the-box thinking, rather than focussing on the existing location which is there by happenstance, and not by design.</i>		
	<p>Policy 13: Development outside settlement boundary + 5: Settlement Identity</p> <p><i>Reference the Settlement Boundary and Conservation Area for Purton – SHLAA sites: Purton.</i></p> <p><i>The Neighbourhood Plan preferred sites 440 and 470 are outside the settlement boundary, and are on the outermost southern border of Purton. Developing this land is highly likely to encourage further expansion to the south of the village, with the spectre of eventual overrun of Purton by the principle urban area (PUA) of Swindon.</i></p> <p><i>This is counter to the stated intention of the Neighbourhood Plan; “Maintaining the separation between Swindon and the village of Purton and hamlets of the Fox and Hayes Knoll as open countryside should be preserved and not lead to coalescence to preserve the unique character and identity of these settlements in accord with WCS Core Policy 51”.</i></p> <p><i>Furthermore, of the SHLAA sites, there are what appear to be more suitable alternatives to sites 440 and 470, that are not on the villages’ extremities, e.g. sites 1120, 88 and 443 are more within, rather than on the outskirts of the village.</i></p>	<p>Being on the south of the village, these sites would not lead to coalescence with the principal urban area of Swindon.</p> <p>Development of Site 443 Station Road on the east of the village would eat into the land between Purton and Swindon which most want to retain as open countryside.</p> <p>The small Site 88 is within the settlement boundary and development there has already started hence the reason it is not included in the Plan. Site 1120 Jewels Ash is in the open countryside and development would impinge on the escarpment around the north side of the village.</p>	None needed.

	COMMENT	RESPONSE	NP MODIFICATION
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Resident 4 [REDACTED]

	<p>Please could you explain why there has not been much mention of Ridgeway Farm development and Mouldon View. The congregation at St Mary's Church Purton is trying very positively to include these two new estates in all church activities as we believe they are all now part of Purton. Please can you clarify whether or not these houses of which there are now many hundred that are occupied are part of Purton Parish and therefore should be included in the Purton Neighbourhood Plan.</p> <p>I was thinking more of the amenities needed for them access to the village etc and the development of amenities within the parish to accommodate the extra numbers of people/families/homes.</p>	<p>Both the development at Ridgeway Farm and at Mouldon View are part of the parish.</p> <p>However from a housing perspective they are about the growth of Swindon and not that of Wiltshire and for this reason are not included in the Plan.</p> <p>Apart from a single-form primary school, developers did not provide amenities such as shops, leisure and sport facilities, or doctors and so on relying, much to the annoyance of Swindon, on Swindon amenities to support these developments.</p>	<p>None needed.</p> <p>None needed.</p> <p>None needed.</p>
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Purton Parochial Church Council

	<p>Description of the Parish of Purton</p> <p>We are concerned that the Description does not give a full and balanced description of the Parish:</p> <ol style="list-style-type: none"> Although it points out in Paragraph 2.5 that the parish has a higher percentage of people of pensionable age than elsewhere, it fails to point out that it also has a higher percentage of children of school age. It also fails to mention that the village has two primary schools and a large secondary school. Therefore, the Description gives an unbalanced picture of village life and the Description 	<p>Actually no. The 2011 census (KS102EW) shows the percentage Purton's young people are on a par with the rest of Wiltshire and only marginally higher than England as a</p>	<p>Add narrative on the two primary schools and secondary in Chapter 2 of the Plan.</p>
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	COMMENT	RESPONSE	NP MODIFICATION
	<p>and what follows should take more account of the needs of these children and of their families.</p> <p>2. We are concerned that the Plan is dismissive of the new developments in the east of Purton. Within a couple of years the Purtonian residents living in these new houses will make up more than 25% of the village population and be of a different demographic. As a church, in partnership with the Purton Methodist's, we have reached out to both the new school at Ridgeway Farm and to the residents there and already offer a Messy Church in the school once a month. We believe that these new residents should be welcomed into the village and that the plan should not ignore their needs dismissing them as "supplying the Swindon housing market". The older children in these houses will also attend Bradon Forest School in the village. The figures about the population of Purton in the Plan both now and in the near future need to recognise these new developments too.</p>	<p>whole. Comment in relation to the schools noted.</p> <p>Correct, they will make up about 36% of the population of the parish NOT just the village. Of course new residents should be welcomed but not just to the village but also to the adjoining communities in west Swindon but this is not the purpose of the Plan which is about future land use in the parish.</p>	<p>None needed.</p>
	<p>Facilities</p> <p>We are disappointed that the Draft Plan fails to consider the spiritual needs of the Parish. We take some responsibility for this, not having made any input previously. We hope that it is not too late to include spiritual needs of the village in the Plan, (St Mary's Church is more than just a heritage site).</p> <p>We would like to see an additional bullet point in the text box at the beginning of the Facilities section. We propose the following text for this:</p> <ul style="list-style-type: none"> To protect and develop St Mary's Parish church which, with the Methodist Church, is of special importance for the spiritual well-being of the community and provides for major stages of life like weddings and funerals. <p>The PCC of St Mary's has developed plans for the building to make it more useful,</p>	<p>Noted.</p> <p>The Plan is not about spiritual well-being, it is about land use for the purpose of planning (housing and employment).</p>	<p>None needed.</p> <p>None needed.</p>

	COMMENT	RESPONSE	NP MODIFICATION
	<p>both for church use and as a facility for secular village activities. Currently it is greatly underused asset of the village, offering a venue seating over 300 with an exceptional interior and acoustic. We would like the Plan to mention and support this development.</p> <p>Therefore, we would like a bullet point added to paragraph 3.12:</p> <ul style="list-style-type: none"> Carry out a sensitive enhancement of St Mary's Church so that this unique and beautiful building can better serve and inspire the people of Purton, now and into the future. This will include improving the seating, heating, lighting, toilets, food-serving facilities and parking. 	<p>The Plan is not about enhancing existing buildings but about land use for the purpose of planning (housing and employment).</p>	<p>None needed.</p>

Resident 5 ~

	<p>Housing: I disagree with the sites for building new houses in dogridge and at the parade. These developments will not meet the needs of elderly residents, being mostly flats. It will also add to the traffic and road congestion on pavenhill, most noticeable at the parade. In addition, any new housing in the village will place strain on the traffic and local amenities such as the gp surgery without additional amenities such as a supermarket or adequate bus routes, meaning the majority of these homes will need at least one car adding to congestion as there is minimal local employment. The plan references over 700 dwellings developed nearby and I fail to see why additional dwellings (the lan references 75 and 40, well above the 95 referenced elsewhere in the document) are needed specifically in this village. Not only will this cause many homes to be overlooked, remove garages which are in use and it will impact house prices and I believe will hinder the villages character. My views are echoed by many, as shown by the rejection (pending appeal) of the recent application for developments in dogridge.</p>	<p>Comment is noted but the three small sites in Dogridge are for up to ten small affordable houses which the village is in need of. It may create some additional traffic but in the wider section of Pavenhill where there are (proper) footpaths. Dogridge is within walking distance of Pavenhill shops.</p> <p>The 700 dwellings at Ridgeway Farm are to support the growth of Swindon but additional houses are needed to support the growth pressures in the village.</p> <p>As to the last sentence, assume this</p>	<p>None needed.</p>
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	COMMENT	RESPONSE	NP MODIFICATION
	<p>Preserving the country - I agree with the policies to preserve the country side and parks from developments and to maintain footpaths.</p> <p>Road safety - I'm not sure how the proposals would make the roads safer.</p>	<p>should be about Land North of Pavenhill which would be a larger development outside the settlement boundary and connect directly to the narrow part of Pavenhill where there are no pavements.</p> <p>Noted.</p> <p>It is proposed to use the Community Infrastructure Levy to fund a study into how Lower Square could be made safer though funds would need to be found to undertake any changes to the road layout.</p>	<p>None needed.</p> <p>None needed.</p>

Jacqui Lay, Unitary Councillor

	<p><u>Comments regarding the Purton Neighbourhood Plan from Cllr Jacqui Lay, Wiltshire Councillor for Purton and resident of the village for 35 years at Widham.</u></p> <p>Having a Neighbourhood Plan for the community of Purton is essential to help plan the future of the village and the plan being put forward is after many years of hard work carried out by a small team of volunteers. I would like to thank them for their perseverance and also the residents of Purton who have input their views, issues and concerns not only to the Neighbourhood Plan process but also the Parish Plan which was adopted a view years ago.</p>	<p>Comment is appreciated.</p>	<p>None needed.</p>
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	COMMENT	RESPONSE	NP MODIFICATION
	<p>Although the Neighbourhood Plan is about land use, it should also include the challenges using the land for housing and employment and how these challenges will be faced and dealt with by those building the houses.</p> <p>I have concerns about the numbers of housing identified as being ‘needed’ within the Neighbourhood Plan as I believe the ‘need’ can be satisfied within the existing housing stock in the village and at Moulden View and Ridgeway Farm. Wiltshire Council’s Housing Allocation Policy puts people with ‘local connection and local need’ as a priority for any available properties that fit the criteria for the need of the housing applicant. The affordable social housing at Moulden View and Ridgeway Farm would come under that policy.</p> <p>The housing numbers identified in the plan are from a Housing Needs Survey. What the survey perhaps is silent on is the capacity of the existing housing stock within the village to provide for the potential population growth of the village. The village population has a high level of older people who are potentially occupying homes larger than their needs. The natural progression of life means that these homes will become available as children move out and people downsize and pass away so in the future hence potentially satisfying the ‘needs’ of the village.</p> <p>As highlighted in the plan, one of the main concerns for the current residents is the volume of traffic now coming through the village, plus the speed of traffic and general traffic issues. These issues are regularly raised to me as the local Wiltshire Councillor and also I know to the Parish Council. One of the problems in the village is the need for car ownership for residents, as public transport is not good and is not used sufficiently for operators of the service to see it as a viable business. The parking of cars in some areas around the village is a problem, as it seems the existing older stock of homes (built pre-car ownership) have no car parking and the newer houses built in the last decade are not providing enough spaces for cars within properties or even on street parking without causing blockages for other</p>	<p>Noted and is addressed (in part) in the analysis of available sites in Purton ~ Planning for the Future.</p> <p>The housing need in the Plan is not taken from Housing Needs Survey, which sets out to justify identify the amount of affordable housing required, but the total number of houses of all types from open market to affordable housing required to meet the projected growth in the parish and mainly in the village of Purton.</p> <p>Should note that the growth in Purton comes about totally from inward migration into the village as it is considered a desirable rural location to live.</p> <p>The issue of traffic and its concern to local residents is well known and documented but traffic is not within the scope of a neighbourhood plan which is about land use.</p> <p>The provision of car parks is an issue but was not raised during the consultations or was a suitable</p>	<p>None needed.</p> <p>None needed.</p> <p>None needed.</p> <p>None needed.</p> <p>None needed.</p>

	COMMENT	RESPONSE	NP MODIFICATION
	<p>road users.</p> <p>Putting more homes into the village will only exasperate the situation as one of the main problems in Purton is the road system serving the village. Every road into the village has several pinch points or are single width and with the increased housing numbers on the west of Swindon through traffic has increased dramatically.</p> <p>Infilling into the village is not in my view the answer to provide housing for residents of the parish as the density of the housing in the village is becoming very cramped, with the loss of established gardens and adjacent agricultural land, caused by over infill. In the case of Purton this is not conducive because of the existing road network with potentially only one main route through the village.</p> <p>The strain put onto the provided services from any additional residents needs to be accommodated within the plan and many of the comments made by the public express this as a main concern.</p> <p>It is the provision of services and infrastructure that makes a development sustainable or not.</p> <p>Location of any site needs to be carefully assessed to ensure that there is not a knock-on effect and impact.</p> <p>The location needs to be such that the road system to the site is appropriate to take additional traffic. Building off Collins Lane is a concern as Station Road has its challenges and Collins Lane is inappropriate for volume levels of traffic. Building at the top of the village also has its challenges with both Restrop Road and Pavenhill leading out of the village being narrow. Building south of the railway line is a concern due to the flows of surface water getting under the railway. Building north of the railway also has challenges as foot access into the village is over a narrow road bridge. The impact of any additional homes is not just the strain on the existing infrastructure and road system but also whether sufficient</p>	<p>site(s) identified during the process.</p> <p>Noted, the roads through Purton were built to suit the horse and cart rather than the high volumes of modern traffic.</p> <p>Whilst the overall population of the country continues to grow, cities, towns and rural villages will also be required to accommodate some proportion of that growth.</p> <p>The provision of the infrastructure required to support new development is covered in Core Policy 3 (Community Infrastructure Levy and Section 106 agreements).</p> <p>Noted and agree with the points raised but these have been dealt with in the analysis in Purton ~ Planning for the Future.</p> <p>The impact of additional homes is covered in Core Policy 3 of the Wiltshire Core Strategy.</p>	<p>None needed.</p> <p>None needed.</p> <p>None needed.</p> <p>None needed.</p> <p>None needed.</p> <p>None needed.</p>

	COMMENT	RESPONSE	NP MODIFICATION
	<p>infrastructure is in place and can be provided for. This includes essentials of modern living with the provision of utilities, and how access can be gained for services provided by the Local Authority and health provision. Logically services should be provided at the nearest point of delivery but we know this does not happen in that we cannot access services in Swindon but need to look to Wiltshire Council at the nearest main office in Chippenham. This also seems to include health provision as residents are directed to Chippenham Hospital rather than the nearby GW Hospital in Swindon. For those with limited access to transport these situations can be a major challenge.</p> <p>The type of housing delivered in the future will shape the community in the future and the needs of the community. If the right type of employment is not provided and connectivity to get around the community, then will this cause new problems in the future?</p> <p>At some point, it needs to be recognised that Purton may be actually at its limit unless extensive changes to the road network are made.</p> <p>Any changes to the infrastructure and road network needs to be considered from strategic sites and Purton is not an appropriate place for strategic sites.</p> <p>I personally believe that the village itself can only take very limited numbers of houses of small clusters within the boundary or around the edge. These homes need to be part of careful consideration of what the village actually needs and does not have provision for already. There are already many smaller properties, there are several affordable and social homes within the parish, but what we don't have are properties for vulnerable people who need to stay in the community to have continued support from their families, and homes in the gap between affordable and the larger expensive homes. What might be useful is to know the price level homes need to be marketed at, using the income levels of residents, as this should then dictate what is actually needed and the actual homes then built</p>	<p>Agree with comment on Health Care, it is scandalous that patients from Purton have to travel half way across the county for continuing health care rather than being able to access the much closer facilities in Swindon but this does not fall within the scope of a neighbourhood plan.</p> <p>Noted.</p> <p>Noted.</p> <p>Noted, that is the role of the Wiltshire Core Strategy.</p> <p>Noted but Purton has a very much lower amount of affordable housing than the rest of Wiltshire.</p> <p>The provision of homes for the vulnerable people is not within the scope of a neighbourhood plan.</p>	<p>None needed.</p> <p>None needed.</p> <p>None needed.</p> <p>None needed.</p> <p>None needed.</p> <p>None needed.</p>

	COMMENT	RESPONSE	NP MODIFICATION
	<p>are for those in the parish who have these needs.</p> <p>The Wiltshire Core Strategy is clear on the number of houses that are needed in the whole community area and these are being delivered from sites elsewhere.</p> <p>The Neighbourhood Plan should be about identifying any additional 'need' of the village however can it then restrict who moves into the village to these new homes? If it cannot then there will potentially always be a gap in provision.</p> <p>At some point in time it has to be accepted that some communities have limited capacity to take more housing and there are better places to put housing where road systems are in place together with infrastructure.</p>	<p>Agreed but it is a minimum number not a maximum and nor does it deal specifically with growth that Purton itself needs (across all types of housing provision).</p> <p>Agreed but the argument is unlikely to be accepted at this time.</p>	<p>None needed.</p> <p>None needed.</p>

STATUARY CONSULTEES

Wiltshire Council Comments

	<p>General Comments</p> <p>The Council has recently reviewed the current draft of the Purton Neighbourhood Plan for potential impacts upon the network of European protected sites known as Natura 2000 and has concluded that that your draft plan would have no likely significant effects upon any European designations. Please note that HRA is an iterative process and future iterations of the plan should also be screened if the policies change significantly. (HRA screening opinion is attached.).</p> <p>The vision for the plan could be clearer and there is a need for consistency, e.g. Para 3.1 refers to 'the Purton NP vision and objectives' and then lists 'aims to achieve'. Para 3.2 refers to 'respective objectives' which are then identified as 'goals' in the policy sections. Again para 3.4 refers to the 'NP vision'.</p> <p>The Wiltshire Housing Site Allocations Plan (HSAP) is currently out for consultation</p>	<p>Noted</p> <p>Noted.</p> <p>Noted.</p>	<p>None needed.</p> <p>Revised Para 3.1, 3.2 and 3.4 for consistency.</p> <p>None needed at</p>
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	COMMENT	RESPONSE	NP MODIFICATION
	<p>and includes proposals to amend the settlement boundary for Purton. At this stage this is a draft document but consideration should be given to how the HSAP proposal relates to the proposals within the draft PNP as it is understood that the PNP replicates the settlement boundary in the current adopted plan which may change during the lifetime of the PNP.</p> <p>The proposals in the draft PNP will increase the resident population in Purton which in turn is likely to have an impact on local schools.</p>	See next two sections below.	<p>present but may need to review when the final HSAP is published.</p> <p>None needed.</p>
	<p>Primary School Places</p> <p>Latest projections at Purton St Mary's indicate that the school would have sufficient capacity to accommodate children arising from any limited new housing proposed in Purton.</p> <p>It should be noted that the new school at Ridgeway Farm is already full and over-subscribed moving forwards. There is no scope to enlarge Ridgeway Farm Primary beyond the 1 FE school building provided by the developer as the site was limited to 1.2 Ha.</p>	<p>Noted.</p> <p>It is disappointing that such a small school was built to accommodate the children for the 700 new homes at Ridgeway Farm, and lessons should be learned from that.</p>	<p>None needed.</p> <p>None needed.</p>
	<p>Secondary School Places</p> <p>Bradon Forest School serves the Purton community and current projections indicate it is expected to be full from 2021 with the demand arising from housing development in the area. Bradon Forest however takes a proportion of its children from Swindon families and it is therefore anticipated that those Swindon families who may have been able to get a place at Bradon Forest in the past, will no longer be able to and will need to seek alternative school provision, if more children arise from developments within area.</p>	Noted, disappointing there was no developer contribution towards increasing the capacity at Bradon Forest School to cater for this foreseeable growth at Ridgeway Farm.	None needed.

	COMMENT	RESPONSE	NP MODIFICATION
	<p>Introduction</p> <p>The neighbourhood plan makes several references to the WCS to acknowledge that the Plan needs to be in accordance with these higher tier policies. When the Local Development Plan is first mentioned at para 1.1 it would be worth also referencing the saved policies of the former District plans which are also part of the Local Development Plan.</p> <p>May not need the detail on the history of New-V. The important point is to document the early consultation process which has been done in the supporting statement of consultation and in the paragraphs headed Neighbourhood Plan Consultation.</p> <p>Para 1.19 could be updated. Cricklade NP has been submitted to Wiltshire Council for Regulation 16 consultation.</p>	<p>Noted.</p> <p>Noted.</p> <p>Noted.</p>	<p>Add reference in the Plan to the saved policies of the former NWC.</p> <p>None needed.</p> <p>Update Para 1.19 to show Cricklade NP has been submitted to WC for Regulation 16 consultation.</p>
	<p>Employment: Purton Policy 1</p> <p>The goal to positively encourage local employment through the plan to seek to reduce out commuting is supported.</p> <p>Objective 3 relates to affordable housing.</p> <p>Purton Policy 1 restricts new development at Purton Brick Works to Class B 1 employment uses. This is more restrictive than Core Policy 19 of the WCS. Is there evidence for the focus on Class B 1 only?</p> <p>Consideration could be given in Purton Policy 1 to retaining land and buildings in employment use at Purton Brickworks and Penn Farm Industrial Site for</p>	<p>Noted.</p> <p>Agreed.</p> <p>None ~ came out of Parish Plan to support start-up and small businesses based on the prevailing business types in Purton</p> <p>Noted.</p>	<p>None needed.</p> <p>Remove objective 3.</p> <p>None needed.</p> <p>Add as worded in Policy 1.</p>

	COMMENT	RESPONSE	NP MODIFICATION
	employment to protect these valuable employment locations from alternative development.		
	<p>Transport: Purton Policies 2 and 3</p> <p>Purton’s commitment to using CIL receipts for specific projects provides clarity on how certain transport issues are to be addressed. Land use policies relating to traffic management are, however, difficult to phrase. Purton Policy 2 should focus on the proposal rather than the delivery mechanism.</p> <p>For example, opportunities to improve pedestrian and traffic safety will be sought at...</p>	Noted.	Amend the wording in Policy 2 to reframe the proposal as suggested.
	<p>Environment: Purton Policies 4, 5 and 6</p> <p>Environment Section of the Neighbourhood Plan</p> <p>With regards to the overarching goal and aims/objectives relating to the environment that are set out in the table on page 20 of the plan, it is encouraging to see that there is an intention to protect existing nature conservation sites and to seek opportunities for ecological gain. Is it possible to include an aim within the aforementioned table that clearly follows on from the overarching goal and which stipulates the intention to identify and implement ecological enhancements wherever possible, such as part of proposed developments, in order to work towards a net gain for biodiversity rather than just protecting existing ecological features/sites.</p> <p>It may then be appropriate to consider including a dedicated biodiversity/ecology and nature conservation policy as at present Purton Policy 4 concentrates on landscape and visual impacts if there are specific local opportunities. It may prove worthwhile including such a policy that actually encapsulates the elements of the overarching environment goal and aims that pertain to ecology and nature</p>	<p>Noted.</p> <p>Noted.</p>	<p>Amend table on Page 20 to include the words suggested.</p> <p>Add a dedicated biodiversity/ecology and nature conservation policy.</p>

	COMMENT	RESPONSE	NP MODIFICATION
	conservation. Clearly setting out the objective to protect nature conservation sites and biodiversity, and to seek opportunities to enhance ecology in a dedicated policy should help to ensure the realisation of the objective.		
	<p>Facilities: Purton Policies 7, 8, 9, 10 and 11</p> <p>The Cedars is an existing use to be retained rather than a new allocation. The wording of the policy suggests control over who is able to live there.</p>	Noted.	Change wording in policy 8 from <i>"allocation"</i> to <i>"retained"</i> .
	<p>Policy 11: Play areas, leisure, open space</p> <p>The council welcome the importance the Parish Council place on their existing Leisure & Play Facilities. Might it be possible to consider inserting into Purton Policy 11 a requirement that new residential development should, where possible, include safe cycling and walking routes not only to the village centre but also existing leisure & play facilities.</p> <p>Also in relation to Purton Policy 11 can consideration be given to whether there is scope to connect these areas with existing rights of way with a view to improving green infrastructure within the parish. It would be worth including reference to this within the plan if deemed feasible.</p>	<p>Noted. All infill sites open onto roads that have paved pavements. Restrop Road site would need a pavement along to Red Gables. No real options for cycle ways.</p> <p>Noted. Play areas are already connected with the existing rights of way.</p>	<p>Add suggested words as a condition in Policy 13</p> <p>None needed.</p>
	<p>Housing Purton Policies 12, and 13</p> <p>The latest Wiltshire Housing Land Supply Statement Update, March 2017 indicates that 0 homes still need to be identified in the Royal Wootton Bassett and Cricklade rural area compared to the 63 identified in the draft PNP. This number is expressed in the core strategy as 'approximately' therefore the additional homes proposed in the draft PNP remains appropriate for the village.</p>	Noted.	Update paragraph after Map 10 to reflect March 2017 Wiltshire Housing Land Supply Update.

	COMMENT	RESPONSE	NP MODIFICATION
	<p>Noted that this draft clearly states all new site proposals must be read in conjunction with the Wiltshire Core Strategy and applied against all relevant policies. Affordable Housing Policies CP43 and CP44 [sic] are clearly mentioned. CP45 also mentioned. However, CP46 is missing and really needs to be included if any dwellings are going to be built to more than the basic Building Regulations - ie: especially if aiming to deliver any units to a comparable 'Lifetime Homes Standard' (or its equivalent standard now i.e.: M4 Building Regulations - accessible/adapted units for older people or people with disabilities). As Code for Sustainable Homes has replaced with new Building Regulations - this makes achieving or expecting anything like LTHS extremely difficult now - and really only achievable when linked to CP46. CP46 units require very clear needs evidence to justify why we are seeking units of this type, on a scheme in this particular location etc</p> <p>Purton falls within a 40% AH contribution area which should be made clear in the draft PNP as only the site at Restrop Rd is clearly above the 10 unit threshold established by national policy as appropriate to provide affordable housing contributions. The remaining sites will need to be assessed once more details are known through the planning application process.</p> <p>It should be noted that the provision of AH is looked at on a site by site basis and has to take account of the current demonstrable need at the time of any planning application. In order to do this a range of credible evidence sources are referred to. The Council's Housing Register is a key source of assessing the current demonstrable need as is referring to wider SHMAs data regarding future need projections Information from the Council's Housing Register could supplement that prepared in 2012 to ensure those conclusions are still relevant.</p>	<p>Noted. Policy 12 cites CP43 (affordable homes) and 45 (meeting housing needs) but not CP44 (rural exception sites) as stated. CP46 (Vulnerable and Older People) is not included but inclusion needed for Life Time Homes.</p> <p>Noted.</p> <p>Noted.</p>	<p>To add CP46 in Policy 12</p> <p>None needed.</p> <p>None needed.</p>
	<p>Policy 12: Development Principles</p> <p>Policy 12 stipulates that proposed development should: 'protect and preserve biodiversity and the landscape setting of the village in accordance with Wiltshire</p>	<p>Noted.</p>	<p>Amend bullet point in Policy 12 to include</p>

	COMMENT	RESPONSE	NP MODIFICATION
	<p>Core Strategy Core Policies 50 and 51' Whilst the inclusion of this aim is positive, may I suggest that it be amended to stipulate that opportunities for ecological enhancement/gain will be sought and incorporated within proposed developments as this is also in accordance with Core Policy 50 of the Wiltshire Core Strategy (Adopted January 2015) and the National Planning Policy Framework (NPPF).</p> <p>The paragraph set out below policy 12 states: 'The allocated sites do not fall within Natural England risk categories indicating potential risk to designated conservation areas and key habitats or species. In addition, if sites are known to be visited, or are likely to be, by great crested newts, badgers, bats or deer specific consultation would be needed and the appropriate protocols applied should development be considered' I would suggest this is amended as the list of protected and notable species is not limited to those specified, and the potential for presence of protected and/or notable species of flora should also be assessed when considering development proposals. As such it would be sensible to instead refer to the need to assess the potential for protected and/or notable species and species of conservation concern rather than listing specific species. In addition, the Natural England risk categories referenced in the plan pertain to the impact risk zones (IRZs) associated with Sites of Special Scientific Interest (SSSI), however, the ecological assessment of a proposed development site will evaluate the potential for impacts on all ecological receptors including non-statutory nature conservation sites such as County Wildlife Sites (CWS).</p>	Noted.	<p>suggested text and opportunities for ecological enhancement/gains.</p> <p>Amend paragraph following Policy 12 to <i>"assess the need the potential and/or species includingetc"</i>.</p>
	<p>Policy 13: Development outside settlement boundary</p> <p>Policy 13 states: 'Proposed development should: protect and preserve biodiversity on the site' In line with the NPPF and CP50 of the Wiltshire Core Strategy it's preferable for the aim to be that proposed development will result in biodiversity gain as well as protecting and preserving biodiversity. Therefore, I would suggest consideration be given to amending this policy accordingly.</p>	Noted. Actually it does not so the same text with amendments used in Policy 12 needs to be included.	Add additional text from Policy 12 as above.

	COMMENT	RESPONSE	NP MODIFICATION
	<p>The last paragraph of the plan under policy 13 states: ‘The land does not fall within Natural England risk categories indicating potential risk to designated conservation areas and key habitats or species. There are no biodiversity designated conservation areas, key habitats or species within the vicinity of the proposed allocated housing land that trigger the requirement to consult with Natural England on likely risks, since the housing is not more than 50 dwellings (the trigger number). However, this land is known to be visited by badgers and, as such, specific consultation would be needed and the appropriate protocols applied as part of the planning applications process’</p> <p>In line with the comments I have offered for policy 12, the Natural England risk categories refer to IRZs around SSSIs which are statutory site. However, the ecological assessment of any proposed development site should also take account of any non-statutory nature conservation sites such as County Wildlife Sites and Sites of Nature Conservation Importance (SNCI)/Sites of Importance for Nature Conservation (SINC) and paragraph 2.11 and Map 3 of the plan indicate that a number of such sites are present within the parish and should be protected. Therefore, I would suggest that the wording of the policy be amended to reflect this.</p> <p>Furthermore, policy 13 makes specific reference to badgers, however, any proposed development site outside the settlement boundary will need to be assessed for its potential to support a range of protected and notable species which may be present even if the site lies out with a designated nature conservation site. As such I would suggest the wording of the policy be amended to reflect that the proposed site will need to be subject to an assessment for it’s potential to support other protected and notable species aside from, and as well as, badgers.</p>	<p>Noted.</p> <p>Noted.</p> <p>Noted.</p>	<p>In the last paragraph after Policy 13 include <i>“the proposed site will need to be subject to an assessment for its potential to support other protected and notable species aside from, and as well as, badgers.”</i></p>

	COMMENT	RESPONSE	NP MODIFICATION
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Wiltshire Council HRA Screening

	<p><u>Re: Habitats Regulations Screening Assessment of Purton Neighbourhood Plan</u></p> <p>The Council has recently reviewed the current draft of the Purton Neighbourhood Plan for potential impacts upon the network of European protected sites known as Natura 2000. The attached 'Habitats Regulations Assessment' (HRA) is made on behalf of Wiltshire Council, the competent authority for the plan, and is in accordance with relevant statutory requirements and best practice.</p> <p>I note that the plan allocates relatively small areas of residential development, well within the projections of the Wiltshire Core Strategy for the area. The HRA has concluded that your draft plan would have no likely significant effects upon any European designations. Please note that HRA is an iterative process and future iterations of the plan should also be screened if the policies change significantly.</p>	Noted.	None needed.
	<p>Purton Draft Neighbourhood Plan Habitats Regulations Assessment (HRA) Screening</p> <p>1. <u>Screening Methodology</u></p> <p>Each element of the draft plan¹ has been categorised against the screening criteria developed on behalf of, and endorsed by Natural England². This approach is advised to help provide a clear audit trail for the assessment of local planning documents (which may be applied to neighbourhood plans), and if necessary identify the need for the policies to be removed / amended or new policies added to be certain that the plan will not have a significant negative effect on a European site.</p> <p>The criteria used were as follows:</p>	Noted.	None needed.

	COMMENT	RESPONSE	NP MODIFICATION
	<ul style="list-style-type: none"> • Category A1: The policy will not itself lead to development e.g. because it relates to design or other qualitative criteria for development; • Category A2: The policy is intended to protect the natural environment; • Category A3: The policy is intended to conserve or enhance the natural, built or historic environment; • Category A4: The policy would positively steer development away from European sites and associated sensitive areas; • Category A5: The policy would have no effect because no development could occur through the policy itself, the development being implemented through later policies in the same plan, which are more specific and therefore more appropriate to assess for their effects on European Sites and associated sensitive areas. • Category B – no significant effect; • Category C – likely significant effect alone; and • Category D – Likely significant effects in combination. <p>The effect of each draft policy has been considered both individually, and in combination. The effects of the whole plan have also been considered in combination with the adopted Wiltshire Core Strategy.</p> <p>2. <u>Wiltshire Core Strategy HRA</u></p> <p>Wiltshire Core strategy HRA derived a set of parameters by which to determine the likelihood of potential impact on Natura 2000 sites. Applying these parameters to the Purton Neighbourhood Plan Area identifies the following issues to be assessed.</p> <p><i>Recreation</i></p> <ul style="list-style-type: none"> • Clattinger Farm Special Area of Conservation (SAC) <p><i>Hydrology / Hydrogeology</i></p> <ul style="list-style-type: none"> • Kennet and Lambourne Floodplain SAC • Hackpen Hill SAC • Kennet Alderwoods SAC 	<p>Noted.</p>	<p>None needed.</p>

	COMMENT	RESPONSE	NP MODIFICATION
	<ul style="list-style-type: none"> • River Lambourne SAC • Cotswolds Beechwoods SAC • Rodborough Common SAC • North Meadows and Clattinger Farm SAC <p><i>Nitrogen Deposition</i></p> <ul style="list-style-type: none"> • Porton Down Special Protection Area (SPA) • Salisbury Plain SAC / SPA • Southampton Water SPA • Clattinger Farm SAC • River Avon SAC • Rodborough Common SAC • Cotswolds Beechwoods SAC <p>Draft policies within the draft Purton Neighbourhood Plan have been screened against each of the above potential impacts, for each Natura 2000 site.</p> <p>3. <u>Draft Purton Neighbourhood Plan</u></p> <p>The draft Purton Neighbourhood Plan includes draft policies to address the following policy objectives:</p> <ul style="list-style-type: none"> • Employment • Transport • Environment • Facilities • Housing <p>All parts of the plan have been screened for potential impacts upon the Natura 2000 network, as set out in Section 4.</p>	Noted.	None needed.

	COMMENT	RESPONSE	NP MODIFICATION
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Lydiard Millicent

	<p>Thank you for notifying us, as an adjoining parish that you are currently consulting on your Neighbourhood Plan. This consultation was considered by Lydiard Millicent Parish Council at both its July and August meetings. Members commented that it was noticeable a great deal of hard work, time and effort had produced a very detailed Plan. The Steering Group should be congratulated on this piece of work.</p> <p>The Councils final resolution was:</p> <p><i>It was RESOLVED that a letter should be sent to Purton Parish Council in concurrence with the comments contained in the Plan.</i></p> <p>It was noted that individuals could also comment on this consultation, which closes at 5pm on Monday 14th August 2017.</p>	<p>This is appreciated</p> <p>Noted.</p>	<p>None needed.</p>
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Natural England

	<p>Natural England has the following specific comments to make:</p> <p>Purton Policy 3: Footpaths</p> <p><i>“New development shall retain and preserve existing footpaths and bridle ways and footpaths in new developments shall provide links to existing pedestrian routes where appropriate.”</i> You may wish to consider whether the policy should protect the quality/attractiveness of public rights of way (rather than just retaining them), and seek compensation measures to improve rights of way if that is not possible.</p> <p>Purton Policy 4: To protect key local landscapes</p> <p>The area shown in green on Map 5. We note that there are a number of shades of green. We suggest you make explicit whether this policy applies to all or some of</p>	<p>Noted.</p> <p>Noted.</p>	<p>Reword Policy 3 to proposed text and include suggestion on compensation measures.</p> <p>Change Map 5 to show the contours of</p>
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	COMMENT	RESPONSE	NP MODIFICATION
	<p>these areas.</p> <p>Purton Policy 12: Development Principles</p> <p>Proposed development should:</p> <ul style="list-style-type: none"> retain existing mature trees and hedgerows. <p>Retaining existing mature trees during the development process does not ensure that mature tree habitat is retained. Firstly, it is common for trees to be lost post development due to development occurring too close to trees (see http://www.leeds.gov.uk/docs/guideline%20distances%20from%20development%20to%20trees%20ma_rch%202011%20(web%20version).pdf for how close development should be located to trees). Secondly, trees age and die. Encouragement should be given for successional planting of new trees. You may wish to consider how to address these points in your policy.</p> <p>We hope you find these comments useful. They should be taken as observations/advisory, rather than an assertion that the plan is unsound.</p> <p>Natural England does not have any other specific comments on this draft neighbourhood plan. However, we refer you to the attached annex which covers the issues and opportunities that should be considered when preparing a Neighbourhood Plan.</p>	<p>Noted. The referencing to the Leeds Guideline Distances from Development to Trees would be inappropriate, use the saved NWLP NE14 Trees and Control of Development</p>	<p>the escarpment rather than using the dark green shading.</p> <p>Add saved policy NWLP NE 14 as a condition in both Policies 12 and 13.</p>

Historic England

	We were in liaison on the content of the Plan and its supporting evidence base in		
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	COMMENT	RESPONSE	NP MODIFICATION
	<p>early June when we provided our most recent advice (see attached).</p> <p>This derived comfort from the involvement of Wiltshire Council’s conservation officer in the assessment of the proposed development sites. At the same time we drew attention to the desirability of confirmation of their advice being supplied in writing so that it could form tangible evidence and address those residual issues which we also identified.</p> <p>The consultation (dated June) versions of the Plan and Purton ~ Planning for the Future appear identical to the drafts upon which our previous advice was based. It would also seem that the supporting documents on the Parish Council website do not contain a response to our advice and as a consequence there does not appear to be confirmatory evidence from the Conservation Officer to verify the suitability of the Plan’s site allocations from a heritage perspective.</p> <p>We would therefore reiterate this desirability, coupled with a recommendation to review the status of policy 13 as an “area of search”. We would encourage your community to complete this simple exercise prior to the submission of the Plan to Wiltshire Council at which time we would be pleased to respond to the associated consultation with what should then be unqualified support.</p>	<p>Noted. Wiltshire Council included this in the updated SEA on the July 2017.</p> <p>Plan updated for their comments of the 16 March and this became the version for consultation. The SEA included confirmation from the WC Conservation Officer.</p> <p>Noted, the issue of the term “<i>area of search</i>” to be reviewed.</p>	<p>See below.</p> <p>WC to write to Historic England to determine if they have seen the updated SEA from WC.</p> <p>Change to “<i>an area to accommodate a site for up to 40 smaller homes....etc</i>”</p>
	<p><i>Relevant extract from email of the 5 June 2017.</i></p> <p>I note the changes to the Plan referred to by Carolyn and the revised Planning for the Future document. Carolyn also refers to discussions with “Caroline” and I assume this might allude to Caroline Ridgwell, one of the Council’s conservation officers. If so, such involvement can only be extremely useful – as a source of evidence and to help verify local decisions.</p> <p>It is perhaps also useful if I reiterate that that the exercise we are engaged in is not to satisfy us ie Historic England but the statutory requirements of national policy</p>	<p>All noted. All of these points are addressed in the updated SEA on July 2017. Wiltshire Council Conservation Officer has confirmed the suitability of the Plan site allocation from a heritage perspective and this is contained in the updated SEA dated July 2017</p>	<p>None needed.</p>

	COMMENT	RESPONSE	NP MODIFICATION
	<p>on the historic environment.</p> <p>Policy 12 (formerly 11) now identifies 6 sites with <u>potential</u> for approximately 75 homes. No quanta have been set against individual sites but presumably there is enough confidence, based on evidence, to believe that that overall figure is deliverable. As far as I can see, development density generally remains common to all sites and is still drawn from SHLAA methodology of 30 houses per hectare. The policy in its revised form assumes that a) each site is still capable of some level of development, and b) without knowing individual site levels the eventual total will allow for around 75 homes to be built.</p> <p>The policy has been expanded to include heritage considerations which need to be addressed but without specifying exactly what this needs to embrace. However, the revised Planning for the Future document provides more detailed elaboration. Pages 32 & 33 illustrate a developable area for Site 66 of 0.44 ha leading to a maximum of 11 houses. They also identify other factors which should influence the nature and footprint of development. While the document doesn't actually contain evidence on the nature of the <u>significance</u> of the relevant heritage assets I assume that the responses to it as set out are appropriate for their protection and based on a sufficiently informed level of understanding which the Council's conservation team can verify.</p> <p>Similarly, site 91, p38, indicates that to preserve the setting of relevant designated heritage assets <u>consideration</u> should be given to retaining the frontage to the High Street. This seems a bit woolly. Either such an approach is required to preserve the setting and to constitute acceptable development or it isn't. If the evidence to support such an approach isn't clear then maybe it needs further attention.</p> <p>I appreciate that the wording isn't so ambiguous as far as the retention of the stone building is concerned. Again, the conservation team can no doubt provide</p>	<p>(on the Parish Council website)</p>	

	COMMENT	RESPONSE	NP MODIFICATION
	<p>clarification.</p> <p>We note that site 89 has now been excluded.</p> <p>Policy 13 (formerly 12) has now changed its wording from being a site <u>allocation</u> to an <u>area of search</u>. However, there is still a line drawn around the site and it is still being allocated for up to 40 homes. This therefore remains an allocation regardless of the wording as the presumption would still seem to be that the area can deliver up to 40 homes in some way while still satisfying the full requirements of the policy and evidence exists to demonstrate that fact. The use of the term “area of search” is confusing and perhaps misplaced in this context.</p> <p>The site is an amalgam of parts of sites 440 & 470. The Planning for the Future document identifies the relevant heritage considerations for these sites on pp 43 & 59. The nature of the heritage significance is not identified but appropriate responses have been set out. Once more we assume that the Council’s conservation team can verify this approach.</p> <p>It is quite reasonable for advice from the Council’s conservation team to constitute appropriate evidence. To do so it will be important to ensure that this advice is captured in written form – either as a source or as written confirmation of the suitability of information gathered by others. On the basis that such an exercise will be completed to substantiate the policies and assertions made in the Plan and its supporting documents I can confirm that we have no objection to the Plan.</p> <p>I can also confirm that if this were also to form the basis of a revised SEA Screening exercise we would have no objection to the view that an SEA would not be required.</p>		

	COMMENT	RESPONSE	NP MODIFICATION
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Network Rail

	<p>As Network Rail is a publicly funded organisation with a regulated remit it would not be reasonable to require Network Rail to fund rail improvements necessitated by commercial development. It is therefore appropriate to require developer contributions to fund such improvements. With this in mind I would strongly urge that when the council undertakes its viability testing for any proposed allocated sites it considers the impact the proposal may have on the railway infrastructure. The cost of mitigating any impact may have a bearing on the viability and deliverability of any such proposed site.</p> <p>Network Rail is a statutory undertaker responsible for maintaining and operating the country's railway infrastructure and associated estate. Network Rail owns, operates, maintains and develops the main rail network. This includes the railway tracks, stations, signalling systems, bridges, tunnels, level crossings and viaducts. The preparation of development plan policy is important in relation to the protection and enhancement of Network Rail's infrastructure.</p> <p>Level Crossings – there are several level crossings within the plan area!</p> <p>Councils are urged to take the view that level crossings can be impacted in a variety of ways by planning proposals:</p> <ul style="list-style-type: none"> • By a proposal being directly next to a level crossing • By the cumulative effect of development added over time • By the type of crossing involved • By the construction of large developments (commercial and residential) where road access to and from site includes a level crossing • By developments that might impede pedestrians ability to hear 	<p>Noted. The Plan has not allocated any site(s) that will have any impact on the railway infrastructure which includes railway tracks, stations, signalling systems, bridges, tunnels, level crossings and viaducts.</p> <p>Noted.</p> <p>Noted.</p> <p>Noted.</p>	<p>None needed.</p> <p>None needed.</p> <p>None needed.</p> <p>None needed.</p>
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	COMMENT	RESPONSE	NP MODIFICATION
	<p>approaching trains</p> <ul style="list-style-type: none"> • By proposals that may interfere with pedestrian and vehicle users' ability to see level crossing warning signs • By any developments for schools, colleges or nurseries where minors in numbers may be using a level crossing. <p>The Council have a statutory responsibility under planning legislation to consult the statutory rail undertaker where a proposal for development is likely to result in a material increase in the rail volume or a material change in the character of traffic using a level crossing over a railway:-</p> <p>(Schedule 5 (f)(ii) of the Town & Country Planning (Development Management Procedure) order, 2010) to requires that where a proposed development is likely to result in a material increase in the volume or a material change in the character of traffic using a level crossing over the railway (public footpath, public or private road) the Planning Authority's Highway Engineer must submit details to both Her Majesty's Railway Inspectorate and Network Rail for separate approval".</p> <p>Policy 1 – Network Rail supports the proposal for an alternative access to reduce the flow over the existing level crossing at New Road.</p>	<p>Noted.</p> <p>Noted. It is Wiltshire Council Planning Authority to submit details to Network Rail and Her Majesty's Railway Inspectorate of any impact on the railways arising from a planning application.</p> <p>Not in Policy 1 but bullet point in Transport Section.</p>	<p>None needed.</p> <p>None needed</p> <p>None needed.</p>

Environment Agency

	<p>We are very pleased to see a stand-alone policy on flooding (policy 6, page 23).</p> <p>Policy 1 on page 17 refers to two sites for potential employment development (Land at Mope Lane identified as part of Purton Brickworks, Penn Farm Industrial Site). These sites are both affected by surface water flood risk, according to the Flood Map for Surface Water, but this is not mentioned in Policy 1, despite other sites being listed as at flood risk within Policy 6 on page 23. Comments on the</p>	<p>Noted This is appreciated</p> <p>Noted, although there is flooding north of the railway, neither site floods but consider adding a reference to Policy 6, Flooding.</p>	<p>None needed.</p> <p>Add condition to Policy 1 that any development shall demonstrate flood mitigation measures</p>
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	COMMENT	RESPONSE	NP MODIFICATION
	<p>positioning of these employment sites in relation to surface water flood risk should be sought from the Lead Local Flood Authority (LLFA – Wiltshire Council).</p> <p>Map 7 on page 26 shows a proposed cemetery extension. It should be noted that the extension will need a full hydrogeological investigation and assessment to determine the suitability of the site. This is to prevent any pollution of the underlying groundwater. It would be prudent to state this in Policy 9, page 25.</p>	Noted.	<p>(as Policy 6).</p> <p>Add “the extension will need a full hydrogeological investigation and assessment to determine the suitability of the site” in Policy 9.</p>

Southern Water

	I confirm however that Purton Parish is not within Southern Water's operational area, therefore we do not have any comments to make at this time.	Noted. (Thames Water was also contacted)	None needed.
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Highways England

	Thank you for consulting Highways England on the Purton Neighbourhood Plan. Your plan does not represent a severe impact on the Strategic Road Network and Highways England therefore offers no comment.	Noted.	None needed.
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	COMMENT	RESPONSE	NP MODIFICATION
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HOUSING DEVELOPERS

Land and Property Planning

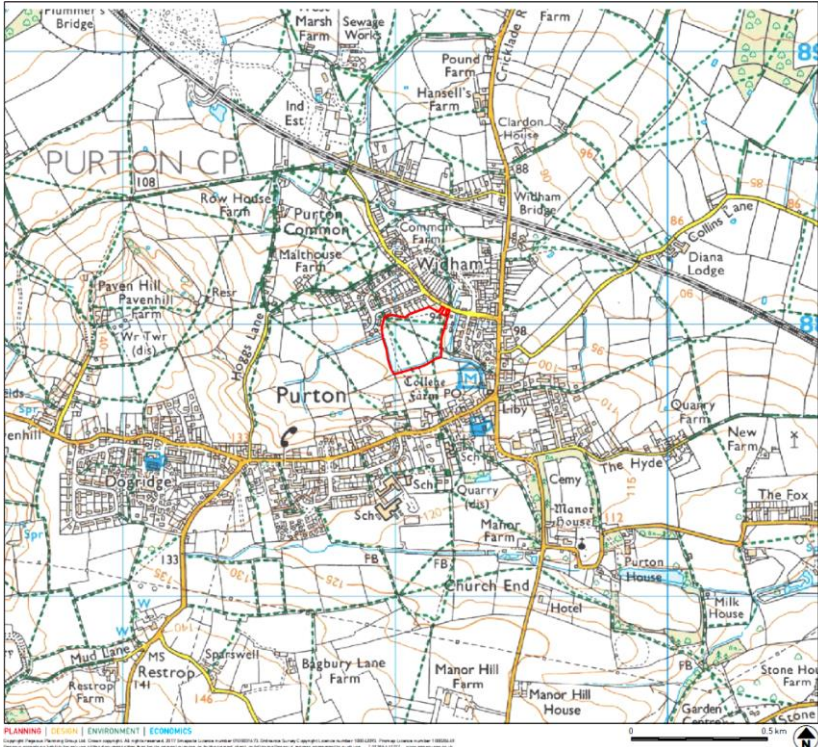
	COMMENT	RESPONSE	NP MODIFICATION
	<p>I am instructed by [REDACTED] to make the following comments in relation to the current proposed Neighbourhood Plan for Purton.</p> <p>Core Policy 2 and paragraph 4.25 of the Wiltshire Core Strategy, both acknowledge that new housing can be delivered in both 'Small' and 'Large' villages where there is an identified need for additional housing via the delivery of a Neighbourhood Plan.</p> <p>The proposed Neighbourhood Plan only proposes to develop all future housing within or adjacent to Purton Village. It does not take account of the future needs or possible opportunities for any new housing development sites coming forward in the adjoining 'Small' village of Purton Stoke.</p> <p>I would be grateful if you could explain the Council's justification to this approach?</p> <p>Yours sincerely, [REDACTED]</p>	<p>The Wiltshire Core Strategy (Local Development Plan LDP) identifies that development should predominantly take place at the larger Principal Settlements, Market Towns and Local Service Centres.</p> <p>Therefore to be consistent with the aims of the LPD the major growth should be at the Larger Village of Purton which has better infrastructure to support the growth but this does not preclude some small development at Purton Stoke in line with Core Policy1.</p>	None needed.
	<p>Feedback Form</p> <p>Do you support all of the policies in the Draft Plan? (Please tick as appropriate)</p> <p>Yes No ✓</p> <p>Policy 12</p> <p>All sites identified in the draft plan lie within Purton and do not take account of future housing needs in the adjoining village of Purton Stoke</p>	See note above.	None needed.

	COMMENT	RESPONSE	NP MODIFICATION
	Policy 13 The future needs of Purton Stoke Village have not been taken into account	Purton Stoke does not have a settlement boundary.	None needed.

Pegasus/ Hannick Homes

	COMMENT	RESPONSE	NP MODIFICATION
	<p>Pegasus have been instructed to submit representations on the Regulation 14 Draft Purton Neighbourhood Plan Consultation (June 2017) by Hannick Homes. At the outset Pegasus wish to state on behalf of our clients that the Pre-Submission consultation on the Draft Purton Neighbourhood Plan (DPNP) is welcomed. The considerable voluntary time and effort provided by those within the Parish who have been involved in the preparation of the plan to date is acknowledged.</p> <p>In particular, the positive approach that the DPNP has taken with regard to the quantum of development required by the village for housing within the remainder of the Wiltshire Core Strategy plan period up to 2026 is most welcomed and encouraging. This will help to ensure that the neighbourhood plan is positively prepared. Without a currently adopted Sites Allocation Document to support the adopted Wiltshire Core Strategy the local community have the opportunity to meet the requirements of paragraph 16 of the NPPF through the development of a Neighbourhood Plan and to;</p> <p><i>“plan positively to support local development, shaping and directing development in their area that is outside the strategic elements of the Local Plan”¹</i></p> <p>It is also appreciated that guidance will have been provided to the Neighbourhood Forum in producing the DPNP by Wiltshire Council officers and the Strategic Environmental Assessment Screening Report dated July 2017 received from the Council is noted.</p>	Noted and is appreciated.	None needed.

	COMMENT	RESPONSE	NP MODIFICATION
	<p>However, notwithstanding the above it is necessary to make representation on the following;</p> <p>Policy 4 - The Protection of Key Local Landscape and the evidence base that sits behind this policy.</p> <p>Policy 12 - Sites that have been allocated within the Settlement Boundary.</p> <p>Policy 13 - Allocation of large site outside the Settlement Boundary</p> <p>The evidence that sits behind the site selection process, as detailed in the document 'Purton - Planning for the Future' (June 2017)² and subject to consultation alongside the PNP is also subject to representation concerning the incorrect scoring that has been applied to my clients site, Land to the rear of Jewels Ash. A site plan indicating the extent of the 3.3Ha Hannick Homes site is attached at Appendix 1.</p>	<p>Noted.</p> <p>View noted but not agreed with, see comments below on Site Scoring below.</p>	<p>See comments on the Site Scoring below.</p>

COMMENT	RESPONSE	NP MODIFICATION
<p>APPENDIX 1 (site 1120) inserted here for ease of reference</p>  <p>My client would also like to draw attention to the fact that to date at no point have they been invited to engage in the Neighbourhood Plan preparation process, there has been no call for sites to which they could respond, nor have they been approached by the Parish Council, or Neighbourhood Plan Steering Group concerning the contribution their site could make to meeting housing need for Purton for the remainder of the plan period.</p> <p>National Planning Practice Guidance requires the ‘wider community’ of which the</p>	<p>Hannick Homes letter of November 2013 were comments in relation to the Parish Plan published January 2014 and not the emerging Neighbourhood Plan (the Plan) first published in October 2016. The points raised in the letter where appropriate were incorporated into the Plan for “informal” consultation of in Jan/Feb 2017. At no time have these comments been misrepresented or ignored in the preparation of the Plan or in any of its supporting documentation.</p>	<p>None needed.</p>

	COMMENT	RESPONSE	NP MODIFICATION
	development industry is part, to be kept up to date on neighbourhood plan preparation - see Paragraph- 048 Reference ID: 41-048 - 20140306. In this instance the comments my clients previously submitted to the Parish Council on the Purton Parish Plan (November 2013) have effectively been ignored and at best misrepresented in terms of being used as evidence to support DPNP preparation. These representations are attached at Appendix 2.		
	<p>Paragraph 1.24 of the DPNP lists the evidence base documents that have been used in preparing the plan.</p> <p>Since publication of the DPNP in June 2017 the Wiltshire Sites Allocation Development Plan Document has been published for a Regulation 19 Pre-Submission consultation by Wiltshire Council in July 2017⁴. This document does not allocate sites for residential development in Purton, which is situated in the Wotton Bassett Community Area of the Wiltshire Core Strategy, however it will be based on an updated evidence base for the purposes of plan making. Any future rounds of DPNP consultation should pay regard to the Wiltshire Council updated evidence base for plan making.</p> <p>Significantly what is lacking from the DPNP evidence base is as follows;</p> <ul style="list-style-type: none"> • landscape evidence specific to Purton to inform Policy 4 • evidence to support the sensitive views identified in Policy 4 • specific heritage asset evidence to inform site selection and site capacities in 'Purton - Planning for the Future' (June 2017) and therefore Policies 12 & 13 of the DPNP. Such evidence should consider listed buildings, conservation area, archaeology, scheduled monuments, undesignated local heritage assets and heritage landscape (where appropriate). • specific biodiversity evidence to inform site selection and site capacities in 	<p>Noted, the draft WHSAP which is out for consultation does not allocate sites for residential development in Purton though it proposed slight changes to the settlement boundary which may have an impact on the Plan.</p> <p>Parish Plan and consultation in 2013 for neighbourhood plan.</p> <p>Impact on heritage assets listed in Annex 11 evaluated across all sites in Annex 8 Purton ~ Planning for the Future.</p> <p>Local biodiversity listed in Annex 10</p>	<p>None needed currently.</p> <p>None needed.</p> <p>None needed.</p> <p>None needed.</p>

	COMMENT	RESPONSE	NP MODIFICATION
	<p>‘Purton - Planning for the Future’ (June 2017) and therefore Policies 12 & 13 of the DPNP.</p> <ul style="list-style-type: none"> • sustainability appraisal of the site selection process detailed in ‘Purton - Planning for the Future’ (June 2017) - Paragraph 072 Reference ID: 41-072-20140306 of the National Planning Practice Guidance applies⁵ and recommends that sustainability appraisal provides a useful approach for qualifying bodies to demonstrate how their draft plan meets the basic conditions test of sustainable development. • sustainability appraisal to inform site selection of comparator sites for Policy 13 of the DPNP - see comment above and footnote 2. It should be noted that notification to the qualifying body by Wiltshire Council (July 2017) that a Strategic Environmental Assessment of the plan is not required is not the same as Sustainability Appraisal of the vision and objectives of the DPNP, the process of scoring sites for selection or comparison of candidate sites for allocation - all of these matters should be subject to sustainability appraisal if the plan is to allocate sites and the sites, on the making of the DPNP, are to become de facto part of the statutory Development Plan for Purton. • It is considered that without the sustainability appraisals described above being undertaken to support the site allocation process, the DPNP fails to meet the Neighbourhood Planning ‘basic conditions’ test subsection d) -see Paragraph: 065 Ref ID: 41-065-20140306 Planning Practice Guidance that ; “the making of the order (or neighbourhood plan) contributes to the achievement of <u>sustainable development</u>”⁶ (emphasis added). 	<p>in Purton ~ Planning for the Future</p> <p>Noted but <i>Paragraph: 072 Reference ID: 41-072-20140306 in What is a neighbourhood planning states “There is no legal requirement for a neighbourhood plan to have a sustainability appraisal”.</i></p> <p>Also in <i>Strategic environmental assessment and sustainability appraisal, Paragraph 026 Reference ID: 11-026-20140306 states:” There is no legal requirement for a neighbourhood plan to have a sustainability appraisal as set out in section 19 of the Planning and Compulsory Purchase Act 2004 and in Paragraph: 005 Reference ID: 11-005-20140306 states: Neighbourhood plans, supplementary planning documents, the Statement of Community Involvement, the Local Development Scheme or the Authority Monitoring Report are excluded from this requirement.</i></p>	<p>None needed.</p>

	COMMENT	RESPONSE	NP MODIFICATION
	<p>Policy 4 <u>To Protect Key Local Landscapes</u></p> <p>The accompanying 'Landscape and Visual Analysis Report' attached at Appendix 3 clearly evidences why a wider study area, which includes the Hannick Homes site, should not be included in the 'Escarpment' designation as defined by Map 5 and should not be precluded from development on landscape grounds as described by Policy 4.</p> <p>In summary with regard to the protection of Purton Common, Purton Policy 4 of the DPNP describes an area "lying between Vasterne Hill, Hoggs Lane and Witts Lane" which "shall be protected from development". For avoidance of doubt, whilst this broad description could also be misinterpreted as including the land identified as Study Area, the text of Purton Policy 4 and the accompanying Map 5 makes it clear that the land to be protected from development is named as Purton Common which lies between <u>the north of Vasterne Hill, The Common,</u> Witts Lane and Hoggs Lane. We recommend that the text of the policy is amended to clarify this point.</p> <p>With regard to topographic considerations, Pegasus consider that the land identified on Map 5 of the DPNP as 'Escarpment' has been arbitrarily drawn and lacks published rigorous analysis for its creation. Furthermore, the land identified as Study Area in Appendix 3 does not form part of the escarpment around Purton and should be excluded from any such designation on topographic grounds.</p>	<p>The report in Appendix 3 noted.</p> <p>There is no confusion, the roads Witts Lane, Hoggs Lane and Vasterne Hill only enclose the area of Purton Common. The only likely confusion may be is that the respondent is confusing Vasterne Close and Vasterne Hill.</p> <p>It is considered that the 90m contour line (the 90m Ordnance Datum) best defined the lower level of the escarpment where it blends with the alluvial plain around north Purton. To best define this area (other than a vague line on a map), the boundaries of existing fields, roads and railway, though excluding areas already developed, best fit this contour have been used to define the area.</p>	<p>None needed.</p> <p>None needed.</p> <p>None needed.</p>

	COMMENT	RESPONSE	NP MODIFICATION
	<p>With regard to protection of sensitive views, the visual analysis of views available towards the Study Area and from within the area of the proposed 'Escarpment' designation in the DPNP, illustrates that the Study Area does not form an important part of views to and from the elevated areas of land around Purton. The lower lying nature of the Study Area's topography and the extent of its visual and physical containment by existing residential development within the settlement of Purton and by the substantial woodland buffer along much of its southern and western edges, means that there is no obvious and robust rationale for the Study Area to be included within the 'Escarpment' designation as set out within the DPNP. Indeed, Map 5 within the DPNP does not identify a 'Sensitive View' which includes the Study area. We therefore contend that it should be removed from the proposed designation.</p> <p>Given the analysis contained within Appendix 3 Pegasus consider that the Study Area does not contribute to the stated aims of 'Purton Policy 4 - To Protect local landscapes', namely the preservation of locally important views both to and from the escarpments to the north of Purton. The Study Area, which contains the Hannick Homes sites should therefore be excluded from this proposed designation.</p>	<p>Disagree, the Photoview 4 provided in Appendix 3 of the Landscape Report, though is not a good example, shows that the complete site is visible from that location and would impact the sensitive view. Whilst the site is relatively low lying it is the beginning of the bottom of the escarpment, see respondent's topography plan.</p> <p>The so-called substantial woodland buffer (a few trees) is at the back of the three houses that front onto Witts Lane but which would have to be removed to gain access to the site. The hedgerow on the south of the site is cut at least annually and not high enough to provide a visual barrier.</p>	<p>None needed.</p>
	<p>Policy 12 <u>Development Principles</u></p> <p>Policy 12 of the DPNP identifies a mix of sites within the village settlement boundary that are proposed to be allocated for residential development, however the site selection process detailed in 'Purton - Planning for the Future' (June 2017) fails to provide evidence on the availability and deliverability of these sites, or on their viability.</p> <p>It is noted that the suite of 6 sites (or group of sites at Site 3316) as detailed in</p>	<p>The availability and deliverability for each of these six sites are defined in the Wiltshire SHLAA but not referenced fully in Policy 12.</p> <p>Noted.</p>	<p>Amend Policy 12 to reference availability and deliverability from the SHLAA.</p> <p>Noted, but no action</p>

	COMMENT	RESPONSE	NP MODIFICATION
	<p>'Purton - Planning for the Future' (June 2017)⁷ are small in nature and many are constrained by the presence of nearby heritage assets. Moreover, the physical shape of the sites and the presence of adjacent properties will limit the form of development that can take place at the sites and will also impact on their viability and therefore their deliverability within the plan period. The constraints that each site experience are detailed below:</p> <ul style="list-style-type: none"> Site 66: Derelict Cottage Farm - constrained by heritage assets; access and biodiversity considerations. The background evidence paper suggests that development of this site would have no added value since, "it has poor access and would remove a notable view from the High Street". Site 91: Land at Northcote - constrained by heritage assets, the evidence base does not identify any potential added value of bringing the site forward. Site 3316: three sites in Dogridge - these sites are constrained by their physical character, the northern site being a long linear site shown as garages/parking in the evidence base. The three sites are surrounded by existing development which will constrain the form and type of development that can take place by virtue of overlooking and impact on existing residential amenity. The sites will prove costly to develop in isolation and will result in the loss of two areas of garaging/parking, their development would result in an associated rise in on street parking and congestion within the village. The evidence base does not identify any potential added value of bringing forward these sites. Site 3318: Hooks Hill - the evidence base points to the need for the redevelopment of this site to potentially require the demolition of the existing 25 dwellings units which currently occupy the site. The replacement of these dwellings with 14 -20 new dwellings will result in a nett loss of dwellings within the village and no nett gain - therefore the site would not be contributing to an 	<p>Of the sites within the boundary, this site has the most constraints.</p> <p>The impact of the heritage assets would not prevent the site coming forward.</p> <p>A developer has brought forward a planning application for affordable houses on these sites.</p> <p>Correct but included for transparency. The total or the other houses in Policy 12 plus Policy 13 would provide enough houses to meet local needs identified in</p>	<p>needed in reference to these six sites in the Plan.</p> <p>None needed.</p> <p>None needed.</p> <p>None needed.</p> <p>None needed.</p>

	COMMENT	RESPONSE	NP MODIFICATION
	<p>increased housing supply for the village despite its allocation.</p> <ul style="list-style-type: none"> Land at North View - This is a back-land site surrounded by existing development which will constrain the form and type of development that can take place on the site by virtue of overlooking and impact on existing residential amenity. Former Youth Centre (with adjoining garages and green space) - the development of this site would result in the loss of a building/site that could be used for community purposes within the village, it also results in the loss of garaging and open space and therefore may result in increased on street parking and congestion. This site also provides a potential opportunity to provide vehicular access or parking for the schools' campus within the village that the DPNP seeks - developing it will result in a loss of the opportunity. The site is an irregular shape and may not prove attractive to a developer. <p>Policy 12 seeks to ensure that the small, constrained brownfield sites within the village settlement area are delivered before sites outside the settlement boundary are released, however in practice, if the aim of the DPNP; which is to deliver a substantial quantum of development before the end of the plan period in 2026 is to be achieved then it is submitted that additional green field sites adjacent to the settlement boundary should be allocated.</p> <p>The small sites have, in the main, already been submitted to the Wiltshire SHLAA process and have therefore previously been identified as potential development sites. There has, to date, been no barrier to these sites coming forward in terms</p>	<p>Purton ~ Planning for the Future.</p> <p>A developer has brought forward a planning application for a mixture of houses including affordable for this site.</p> <p>Owned by the Parish Council. A community building here is considered too out of the way hence the reason for the demise of the Youth Centre here. Sale of the land would enable the Parish Council to use for community opportunities elsewhere in the village. Garages are not used except for storage. Discussion with developer underway for affordable housing.</p> <p>Agreed about the restrictive wording in Policy 12 and it is to be changed. Policy 13 does allocate a green field site though residents would prefer to retain open countryside where it is not required to meet local housing needs.</p> <p>As shown above, some of these sites are coming forward so disagree with the application being</p>	<p>None needed.</p> <p>None needed.</p> <p>Revise wording in Policy 12 to remove this restriction.</p> <p>None needed.</p>

	COMMENT	RESPONSE	NP MODIFICATION
	<p>of their policy status as they lie within the settlement boundary, it is unclear therefore how the allocation of the sites in the neighbourhood plan will assist their delivery. It is clear that there are other factors affecting the sites which to date have prevented them from coming forward.</p> <p>The DPNP provides little comfort or certainty that the small brownfield sites will deliver in the plan period as their viability and deliverability is questionable and evidence to demonstrate to the contrary has not been provided for consideration as part of this Regulation 14 consultation.</p> <p>Larger green field sites would provide more certainty on deliverability than the small constrained brownfield sites identified in Policy 12 as discussed above.</p> <p>Larger sites also have the ability to deliver the range of type and mix of affordable housing the village is seeking to secure, as well as the ability to contribute significantly to enhanced community infrastructure for the village - which the smaller Policy 12 sites cannot - in terms of new public open space provision, flood storage betterment and enhancement to footpath and cycleways in the village.</p> <p>With regard to the evidence base document, 'Purton - Planning for the Future' (June 2017), the use of a density multiplier approach for an unconstrained site area is a crude approach and cannot take account of existing surrounding development, physical site character or other site specific constraints. The DPNP consultation has not provided indicative masterplan layouts to demonstrate the assumed capacities of each of the brown field small sites identified for allocation in Policy 12.</p> <p>The lack of evidence over the deliverability of these sites coupled with doubts over their potential viability means their ability to contribute to the total number of dwellings envisaged by DPNP is questionable. Increased certainty over delivery in the village would be afforded by allocating further sustainable</p>	<p>made.</p> <p>View noted, disagree as other developers are bringing some of these sites forward.</p> <p>Of course many developers prefer green field sites as the cost to develop them is less than brownfield sites. The Plan and Purton ~ Planning for the Future both recognise that to achieve the mix of housing required to meet the local needs of the village a green field site is needed.</p> <p>In Purton ~ Planning for the Future, housing capacity for each site has used Wiltshire Council's SHLAA Methodology (September 2011) of for consistency. Actual density would be considered in a planning application.</p> <p>Some sites have come forward, see above.</p>	<p>None needed.</p> <p>None needed.</p> <p>None needed.</p>

	COMMENT	RESPONSE	NP MODIFICATION
	<p>large greenfield sites outside the settlement boundary.</p> <p>Significantly it is also noted that paragraph 17 of the evidence document, 'Purton - Planning for the Future' (June 2017) states the assumption that the number of additional homes required in the village up to 2026, 'is a minimum number not a maximum number'.</p>	<p>Correct! Population growth is based on census data but circumstances may change that over the period of the Plan.</p>	<p>None needed.</p>
	<p>Policy 13 <u>Development outside settlement boundary</u></p> <p>Policy 13 of the DPNP allocates a green field site outside the existing settlement boundary of the village for the development of up to 40 dwellings units. The reasoned justification for the policy at paragraph 3.15 (immediately preceding the policy text box) states that the evidence document 'Purton - Planning for the Future' (June 2017) '<i>identifies the most resilient site for new development outside the settlement boundary of the village</i>' and that the site to be allocated is '<i>land south of the village off Restrop Road (which includes SHLLA site 470 and 440)</i>'.</p> <p>Hannick Homes submit that the site off Restrop Road is not the most resilient site for new development outside the settlement boundary and that Site 1120 requires further consideration owing to the Site Rating process being flawed and inaccurate.</p> <p>The neighbourhood plan qualifying body have failed to undertake an appropriate 'call for sites' as part of plan making process to support Policy 13 and seem to have relied solely on evidence submitted to the Wiltshire Strategic Housing Land Availability Appraisal process.</p> <p>My client submits that their site is sustainably located, is not subject to flooding, landscape or ecological constraints and has the potential to contribute the additional 40 dwellings required in the plan period. My client's site should have</p>	<p>Correct.</p> <p>It is a view not supported by the analysis.</p> <p>As Wiltshire Council had called for sites 2012 and 2014 and incorporated in the SHLAA, it was not prudent for the Parish Council to try and replicate this.</p> <p>What is a detailed Stage 2 consideration?</p>	<p>None needed.</p> <p>None needed.</p> <p>None needed.</p> <p>None needed.</p>

	COMMENT	RESPONSE	NP MODIFICATION
	<p>been subject to further detailed Stage 2 consideration with Site 470 & 470 before any draft allocation of a site outside the settlement boundary was made by the DPNP.</p> <p>My client has not been afforded the opportunity to date to state that it is not their intention that the site be developed in its totality, therefore the use of the density multiplier approach with regard to the proposed development capacity for this site is incorrect. It is the intention that only part of the site be developed, for up to 40 dwellings, and that the southern part of the site be retained for community benefit including public open space/allotment purposes and to enhance public footpath and cycleway connections.</p> <p>It is submitted that;</p> <ol style="list-style-type: none"> 1. The process used to identify sites for allocation in the evidence document is flawed 2. That the process employed to identify sites for allocation in the evidence document has not been subject to independent sustainability appraisal 3. That the site evaluation criteria have been inputted incorrectly with regard to my clients site resulting in an artificially suppressed score for the site (1120), despite my client engaging in both the Wiltshire SHLAA process in September 2015 and the Draft Purton Parish Plan Consultation in November 2013. 3. That the merits of the site scoring system used in the evidence base have not been weighed alongside other material considerations in the planning balance for the purposes of site allocation. 4. That the planning application currently before Wiltshire Council on part of the site identified for allocation by Policy 13 remains subject to outstanding objections by statutory consultees and fails to address all the requirements of the draft Policy 13. 	<p>The respondents comments on the Parish Plan that Hannick Homes is promoting only 3.3 hectares at Jewels Ash out of a total site of 4.31 hectares (76% of the site) which has the potential for 100 dwellings.</p> <p>Disagree.</p> <p>Disagree, the sites have been equally assessed and there has been no attempt to “artificially suppress” the score for any site in the analysis.</p> <p>Such as?</p> <p>The site in Policy 13 has no direct relationship to site 1120 at Jewels Ash.</p>	<p>None needed.</p> <p>None needed.</p> <p>None needed.</p> <p>None needed.</p> <p>None needed.</p>

	COMMENT	RESPONSE	NP MODIFICATION
	These matters are discussed further below.		
	<p><u>1.& 2. Site Scoring Process and Sustainability appraisal</u></p> <p>These matters are considered together owing to their inter-divisibility.</p> <p>The evidence base document 'Purton - Planning for the Future' (June 2017), describes at pp.25-26 a site scoring process for the purposes of identifying sites for allocation in the DPNP, however it is submitted that using an empirical tool for the process of site identification and allocation is a rather blunt approach that cannot objectively weigh all material considerations relating to site allocation in the planning balance.</p> <p>Moreover, should this approach continue to be pursued for DPNP site allocation purposes then it should itself be subject to sustainability appraisal to ensure that its outcomes result in sustainable development and are therefore compliant with Paragraph 185 of the National Planning Policy Framework⁸. All sites that reach any future amended threshold score for potential consideration for allocation should themselves then be subject to a comparative sustainability appraisal process as part of the evidence base to underpin a DPNP Site Allocation Policy.</p> <p>The methodology behind the scoring mechanism for each row in the scoring table is not explicitly clear in the evidence document. For example, the distance to shops column is not clearly defined, does this mean the distance to the closest A1 shop from the site or the distance to some chosen point in the village centre? This matter is not clear and requires further clarification - without such information the site scoring process lacks transparency.</p> <p>It is submitted that the 'Criteria Importance' column of the methodology should be subject to initial sustainability appraisal as currently being within 400 metres of a veterinary surgery scores 3 points, whereas the potential of a site to flood also scores 3 points, clearly it is far more important that a dwelling may be</p>	<p>It is an approach that many others used though this has been tailored for the needs of Purton.</p> <p>Paragraph 185 of the NPPF states that neighbourhood plan has demonstrated its general conformity with the strategic policies of the Local Plan. The Plan is in conformity with the Core Strategy (the local plan).</p> <p>Where distances are used it is obvious that it relates from the respective site to a facility (i.e. shop). The respondent is being a little obtuse on this matter.</p> <p>The respondent is incorrect as the criteria for the Vet and Flooding are not the same for both; the Vet is set at 1 whereas a criterion for Flooding</p>	<p>None needed.</p> <p>None needed.</p> <p>None needed.</p> <p>None needed.</p>

	COMMENT	RESPONSE	NP MODIFICATION
	<p>susceptible to flooding than that a dwelling is constructed within 400m of a vets practice - yet both matters merit the same score in the site assessment table.</p> <p>This matter requires the Criteria Importance scoring methodology to be independently reviewed and critiqued and sites to be re-assessed according to any reviewed scoring mechanism.</p> <p>Moreover, statements elsewhere in the evidence document point to the increasingly ageing population of the village, yet factors that might help to reduce social isolation such as the score for being in close proximity to venues that would provide for social interaction eg: the Silver Threads Hall, library, church and chapel are low compared to the scores that can be achieved for being in close proximity to other community services and facilities such as the village hall, the doctors or the dentists. It is far more likely that one would make a weekly visit to church or a community interest group at a hall, than a weekly visit to the doctors or dentists. There is no explanation in the evidence text on the reasoning for the variation in scoring for proximity to the various community services and facilities - it is this matter that would be addressed by sustainability appraisal of the site selection methodology used. Currently the evidence base lacks transparency and clarity.</p> <p>The methodology for the 'Initial Rating' column is also unclear and is not evidenced in the text of the document, this means that despite the best efforts of the qualifying body the site selection process employed by the DPNP is not entirely transparent.</p> <p>Similarly, the 'potential to add value' row in the table seems to take no account of other community infrastructure that a site could provide such as public open space, affordable housing, flood storage betterment, accommodation suitable for older persons etc. It is not clear what evidence source has been used to complete</p>	<p>is given a higher importance of 3.</p> <p>Not on the basis of the above comment.</p> <p>Whilst it is the case Purton has an aging population as identified in the Plan, the criteria used needs to reflect the whole community and not just one part of it. To factor in age-related scoring as well would make the analysis overly complex and difficult to interpret. The Site analysis was included as part of the previous consultation at the beginning of the year. As to weekly visits to church, in this day and age it is very unlikely for the vast majority of residents.</p> <p>The initial rating is defined in Purton ~ Planning for the Future.</p> <p>This refers to "enhancement" as called for by the Taylor Review.</p>	<p>None needed.</p> <p>None needed.</p> <p>None needed.</p> <p>Provide clarification in Purton ~ Planning for the Future.</p>

	COMMENT	RESPONSE	NP MODIFICATION
	<p>this row of the scoring table to ensure a consistent approach across all sites in the study. Further commentary is required and the evidence used to complete this row clarified and published for public consultation.</p> <p>The methodology for Site Scoring does not include any reference to the deliverability or availability of sites to deliver in the plan period up to 2026, nor any evidence on the viability of sites to deliver policy compliant affordable housing - indeed my client was not engaged with for the purpose of site scoring, which seems to have been undertaken solely as an empirical desk top analysis of sites.</p>	<p>The site analysis is to compare the physical characteristics of the sites in Purton and specifically those outside the settlement boundary. Deliverability is taken from the SHLAA. As to viability, that will depend on specific plans for the site and is outside the scope of this Plan.</p>	<p>None needed.</p>
	<p><u>3. & 4. Incorrect Scoring of Site Rating for 1120 - Land Rear of Jewels Ash</u></p> <p>My client, Hannick Homes, has previously submitted evidence to both the 2015 Wiltshire SHLAA process and the Draft Purton Parish Plan Consultation (Nov 2013), however it is clear that this evidence has not been used objectively to complete the site scoring assessment for the site at pp. 62 and notes provided at pp.63 of the evidence document.</p> <p>Notwithstanding the comments made above about an empirical approach being a very blunt instrument for site selection, a revised scoring methodology for the site is attached at Appendix 4 that demonstrates that the site should actually score 4.6 compared to the score of 3.5 that it is given in the evidence base document.</p> <p>It is accepted that walking distances in the site rating are by pavements and these are broadly accepted, however during spring, summer and autumn it should be noted that many of the village services and facilities would be accessible by existing public footpaths from the site resulting in greatly reduced walking distances to those included in the site rating. Moreover, development of the site</p>	<p>The comments where relevant submitted by Hannick Homes to the Draft Purton Parish Plan in 2013 have been incorporated in the site analysis.</p> <p>Disagree, since similar approaches have been adopted by other neighbourhood plans.</p> <p>Agreed, during the more clement weather footpaths can be used but it is an assumption that development would result in enhancements to these footpaths.</p>	<p>None needed.</p> <p>None needed.</p> <p>None needed.</p>

	COMMENT	RESPONSE	NP MODIFICATION
	<p>may result in enhancements to public footpath connectivity meaning they may be suitable for use during longer period of the year.</p> <p>The site lies within EA Flood Zone 1 yet it scores a 1 as initial rating for potential to flood - ie: the site rating considers it in the same way as a site within EA Flood Zone 2 or 3. The correct Initial Rating for potential to flooding should be 3 reflecting the fact that the site does not flood and increasing the overall site rating of the site.</p> <p>A Flood Risk Assessment of the site that has previously been undertaken confirms that the site lies within EA Flood Zone 1. The Technical Guidance to the NPPF advises that residential development is appropriate in this zone. Should the site be developed a sustainable drainage strategy, involving the implementation of a Sustainable Drainage System (SDS) would be proposed for managing the disposal of surface water runoff from the proposed development.</p> <p>Any development would be able to balance surface water runoff from the proposed development to greenfield runoff rates for all events up to the 1 in 100 year event, including an appropriate allowance for climate change in accordance with the NPPF.</p> <p>The nearest body of water to the site is an unnamed watercourse that flows from west to east along the southern boundary of the site. The reference on pp.63 of the evidence document to the stream overflowing during periods of very high rainfall would be addressed during development of the site as drainage matters would be considered holistically through the planning application process and the implementation of the sustainable drainage system described above. The client has also previously indicated through past consultations that development of the site could result in flood storage betterment by providing storage for water that causes flooding issues elsewhere in the locality. For the avoidance of doubt, please note that due to the topography of the site any overflow during such periods would be confined to the southern part of the site within land designated as public open space</p>	<p>Noted. This is correctly noted in the Site Analysis on page 63 but not correctly translated in the Site Ratings on page 62.</p> <p>Noted.</p> <p>Noted.</p> <p>The site gentle rolls down towards the north boundary of the site so it is unlikely any overflow would be retained in the southern part of the site. Apart from the stream along the eastern border, the site is not known to flood.</p>	<p>Correct the error in the Site Analysis page 62 for flooding.</p> <p>None needed.</p> <p>None needed.</p> <p>None needed.</p>

	COMMENT	RESPONSE	NP MODIFICATION
	<p>and well below the part of the site in which future housing would be located. There would be no risk of flooding to any future housing.</p> <p>The Initial Rating for potential to 'impact view' is a 1, however evidence submitted above with regard to Policy 4, and supplemented by further evidence at Appendix 3, clearly demonstrates that development of the site will not impact on views that are important to Purton Parish residents, and therefore sought to be protected by the DPNP. The Initial Rating score should be amended to 3, reflecting the fact that development of the site would not impact on views. This would serve to increase the overall Site Rating of the site.</p> <p>Hannick Homes have previously submitted evidence to both the Wilts SHLAA process (July 2015) and the Draft Purton Plan (Nov 2013) that demonstrates that an appropriate access into the site from Witts Lane can be achieved by way of a simple priority junction. The site can be accessed between numbers 1 and 3 Jewels Ash on land that is wholly in the ownership and control of Hannick Homes. The access has previously been designed and for the avoidance of doubt is detailed on the plan attached at Appendix 5.</p> <p>The proposed access detailed in Appendix 5 provides not only vehicular access designed to Manual for Streets standards with adequate visibility splays along Witts Lane, but also pedestrian pavements into the site and vehicular access points for no.'s 1, 3 & 4 Witts Lane via vehicular crossovers.</p> <p>It should be noted that the site is situated within 300m of a bus stop, with the Service 53 between Cricklade and Swindon passing through Purton providing those working or being educated in Swindon with the opportunity to use public transport for their journey to work or school.</p> <p>Guidance on residential street design, set out in Manual for Streets, states that</p>	<p>Photoview 4 from Hannick Homes Landscape and Visual Analysis shows the development of the site would have an impact on the sensitive views of the escarpment.</p> <p>Hannick Homes has not submitted evidence previously to the Plan, only comments on the draft Purton Parish Plan but this did not address access to the site. The issue is with a potential of 100 homes on 3.3 hectares identified that would result in large traffic volumes on Witts Lane at peak times accessing the very busy Station Road.</p> <p>306 metres but the bus does not necessarily go to destinations people want. 70% of Purton residents travel to work by car, census 2011.</p> <p>No, this is too a crude measure for</p>	<p>None needed.</p> <p>Clarify the access from the site via Witts Lane onto Station Road in the site analysis in Purton ~ Planning for the Future.</p> <p>None needed.</p> <p>None needed.</p>

	COMMENT	RESPONSE	NP MODIFICATION
	<p>walkable neighbourhoods are typically characterised by having a range of facilities within 10 minutes (up to about 800m) walking distance of residential areas which residents may access comfortably on foot.</p> <p>In this instance the DPNP evidence base demonstrates that the following facilities are all within an 800m walking distance; a dentists surgery; a chapel; the Village Hall and Parish Council; a veterinary surgery; the library; the village centre and a pub, 'The Angel'. This serves to demonstrate the sustainable location of the site and the fact that residents would reasonably be able to walk or cycle to services and facilities within the village.</p> <p>The Initial Rating score for access should therefore be changed from 1 to 3, reflecting the fact that the site can be adequately served by a deliverable access and that in terms of accessibility to services and facilities by modes of transport other than the private car, the site is located in an accessible location for walking, cycling and access to public transport. This all serves to increase the overall Site Rating of the site.</p> <p>There are currently no known biodiversity constraints at the site so it is unclear why the site has been marked down concerning biodiversity to a 2. Impacts on biodiversity would in any case be further investigated through the planning application process which would require the submission of an ecological assessment for the site with the relevant reptile, bat and other protected species surveys required to be undertaken.</p> <p>Given that it is not my clients intention to develop the whole site there would be opportunity and potential for the mitigation of any lost habitat by the strengthening of any remaining habitat and for new habitat to be created to increase biodiversity at the site. It is considered therefore that the biodiversity score for the site should be increased to a 3. This serves to increase the overall Site Rating of the site.</p>	<p>comparing sites relative to one another. For the site analysis the Table 3.6 from the respected Institution of Highways and Transportation (CHIT) Guideline for Providing for Journeys on Foot is used. These guidelines are backed by much research.</p> <p>No, as the CHIT guidelines have been used but if the criteria were changed to that suggested this would then apply across all sites and it is unlikely the overall ranking of sites would therefore change.</p> <p>No, the site is known to be visited by deer as stated in the site analysis in Purton ~ Planning for the Future. <i>(This is attested to by neighbours of the site)</i></p> <p>Until a planning application was brought forward this could not be known with any certainty but the intention is noted, but the site is still visited by deer.</p>	<p>None needed.</p> <p>None needed.</p> <p>None needed.</p>

	COMMENT	RESPONSE	NP MODIFICATION				
	<p>The scoring for the potential added value the site could provide for the village is also incorrectly scored with an Initial Rating of 1 - that is that the site would not provide any added value for the village. Added value should not relate solely to reduction of traffic congestion or on street parking as the site could bring forward a range of added value for the wider village that potentially could include a mix of the following;</p> <ul style="list-style-type: none"> • The provision of 40% affordable housing • The provision of housing to meet the needs of older people • The provision of smaller homes to meet the needs of first time buyers • The provision of new public open space including an equipped children's play area • The provision of flood storage betterment to resolve existing flooding problems adjacent to the mainline railway • The enhancement of existing public footpaths that cross the site • Enhanced routes for sustainable modes of transport, such as walking and cycling to encourage healthy living and safer routes to school for children. • Improvements to existing habitats for enhanced biodiversity <p>It is considered therefore that the site offers substantial potential added value for the village and the Site Rating should reflect this with an Initial Rating of 3 and increasing the overall Site Rating of the site.</p> <p>All the above individual amendments result in an overall Site Rating score for the Hannick Homes site of 4.6 as evidenced at Appendix 4. According to the methodology used Site 1120 should therefore be considered for allocation over and above Sites 440 and 470 that are allocated under Policy 13 yet only score 4.5 under the evidence base Site Rating.</p> <p>APPENDIX 4 – Revised Site Rating for Site 1120</p> <table border="1"> <tr> <td></td><td>Initial rating</td><td>Criteria</td><td>Multiplicatio</td></tr> </table>		Initial rating	Criteria	Multiplicatio	<p>View noted but so could other sites outside the settlement boundary also provide similar benefits but apart from the 40% of affordable housing defined by the Core Strategy, everything else is speculative though intent is noted.</p> <p>Other respondents have challenged the measure of "added value" as it is seen as qualitative measure rather than a quantitative measure and ask it should be removed. However, this addresses the call in the Taylor Review for "enhancements" by developments.</p> <p>Apart from the minor error in the Site Rating table for flooding, there is no reason to change any of the other ratings for the site. However it should be noted that if the respondent's comments were applied they would also have to be applied across all the sites being reviewed and so it would likely have little effect on the overall ranking of the sites relative to each other.</p>	<p>None needed.</p> <p>Delete the criterion "Potential added value" and replace be a new criterion "Community Enhancements" based on the principles outlined in the Taylor Review (2008).</p> <p>Amend error in the Site Rating table on Flooding and change from a 1 to a 3.</p>
	Initial rating	Criteria	Multiplicatio				

COMMENT				RESPONSE	NP MODIFICATION
		importance	n		
Outside settlement	1	3	3		
Distance to shops	1	3	3		
Distance to Infant and Junior School	2	2	4		
Distance to secondary school	2	2	4		
Distance to bus stop	3	1	3		
Distance to surgery	1	3	3		
Distance to dentist	2	3	6		
Distance to church	1	1	1		
Distance to chapel	2	1	2		
Distance to village hall	2	2	4		
Distance to Silver Threads	2	1	2		
Distance to vet	2	1	2		
Distance to library	2	1	2		
Distance to village centre	2	2	4		
Distance to the Angel	2	1	2		
Distance to Royal George	1	1	1		
Proximity to allotments	2	1	2		
Potential flooding	3	3	9		
Potential to impact view	3	3	9		
Heritage impact	3	3	9		
Good access	3	3	9		
SSSI; CWS	3	3	9		
Mammal biodiversity	3	3	9		
Potential added value	3	3	9		
	SCORE		4.6		

	COMMENT	RESPONSE	NP MODIFICATION
	<p>Furthermore, national planning practice guidance requires neighbourhood plans that allocate sites to take into consideration the infrastructure requirements of the plan - see Paragraph: 045 Reference ID: 41-045-20140306⁹. This matter is not addressed in the Site Assessment evidence base document however Hannick Homes can confirm that their site can be accessed adequately, that foul water drainage can be provided by linking into the existing public foul water sewer in Witts Lane and that surface water drainage can be adequately provided for with an on-site sustainable drainage system.</p>	Noted.	None needed.
	<p><u>5.Existing planning application 16/10513/FUL</u></p> <p>A planning application is currently lodged with Wiltshire Council for part of the site allocated by Draft Policy 13, however the application fails to address all the criteria points listed by PNP Draft Policy 13 and indeed fails to provide the potential added value that the Site Rating considers it will provide in terms of reduced traffic congestion or parking on roads as it makes no provision for the sought after link road to the south of the village through to the schools.</p> <p>The revised application for 38 dwellings remains the subject of outstanding objections from Purton Parish Council, the Neighbourhood Plan Steering group and the Wiltshire Police.</p> <p>The application is due to go before Wiltshire Planning Committee on the 6th September 2017. At the time of writing this representation the Planning Officers recommendation to Committee is not yet known.</p> <p>It is clear therefore that the methodology used for site selection for allocation of a site outside the settlement boundary of Purton at DPNP Draft Policy 13 is fundamentally flawed and lacks the rigour required for site allocation purposes. It is submitted that this matter be addressed in terms of the evidence base used for the Submission Regulation 16 consultation and the DPNP amended</p>	<p>Correct, both the Parish Council and the Neighbourhood Plan Steering Group have objected to this application for development at Restrop Road (site 470) as it is an urban design in a rural setting with larger houses that do not practically meet the needs of the village (see response to 2.64 Turley/Hills Homes).</p> <p>However this does not signify that the physical site selection criteria are flawed but just that the developer wants to put forward something that they see as more beneficial to them rather than to meet the local needs of the village in a rural community. Regrettably</p>	None needed.

	COMMENT	RESPONSE	NP MODIFICATION
	<p>accordingly based on the evidence that emerges. It is also requested that all the matters raised above be attended to, and the evidence presented in the accompanying Appendices digested and applied to site selection, in order that my clients can engage in the Neighbourhood Plan preparation process and their site be considered fairly against all other potential larger greenfield sites for allocation in Draft Policy 13 of the PNP.</p> <p><u>Accompanying Appendices</u></p> <p>Appendix 1 - Site Plan Appendix 2 - Hannick Homes comments on Draft Purton Parish Plan - Nov 2013 Appendix 3 - Report on Landscape Impact and Proposed Protected Views Appendix 4 - Revised Site Rating for Site 1120 Appendix 5 - PFA - Site Access Plan</p>	<p>Purton, as have many other communities, has experienced this type of attitude from some developers.</p>	

Pegasus/ Hannick Homes – *Appendix 2* - Letter to Purton Parish Council dated November 2013 regarding the Parish Plan

	COMMENT	RESPONSE	NP MODIFICATION
	<p>Land at Witts Lane - Response to Draft <u>Purton Parish Plan</u> Consultation</p> <p>Introduction</p> <p>1.1 Hannick Homes has reviewed the draft Purton Parish Plan and has prepared these representations in response to the current consultation.</p> <p>1.2 Firstly, by way of introduction, Hannick Homes is a family owned company based locally in Swindon. Since its establishment in 1979 we have completed a large number of residential and commercial developments in Wiltshire, including the towns of Swindon, Cirencester, Devizes, Calne and Cricklade, and the villages of Shrivenham, Ashton Keynes and Minety. Hannick Homes has also previously completed a number of small scale developments in Purton, including the Jewels Ash development, redevelopment of the former Northview Hospital, and the</p>	<p>The Hannick Homes letter of November 2013 commented on the Parish Plan published January 2014 and not the emerging neighbourhood plan (the Plan) which was first published October 2016. The points raised as appropriate were incorporated in the Plan for “informal” consultation</p>	<p>As these comments relate to the Parish Plan and not the latest Plan June 2017, no response has been made as (1) the Plan has evolved since its first publication in October 2013 and (2)</p>

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	<p>Shaftesbury Close and Station Mews developments located off Station Road.</p> <p>Site Overview</p> <p>1.3 Hannick Homes is promoting a site, 3.3 hectares in size, located to the south of Jewels Ash. The land is owned by Hannick Homes, having been purchased in the 1990s for the purpose of accommodating a small-scale residential development. The site is not currently actively farmed nor formally used for any other purpose. It is our intention to promote this land through the emerging Neighbourhood Plan. We envisage part of the site coming forward for residential development, comprising both market rate and affordable housing, of a scale commensurate with local need. We would also be willing to consider other uses for the land, brought forward in conjunction with residential development.</p> <p>1.4 Hannick Homes has undertaken a comprehensive range of technical assessments of the site and can confirm that there are no significant constraints to its future development. It is also worth noting that the site is sustainably located, within easy walking distance to a range of local services and facilities.</p> <p>Comments on the Draft Parish Plan</p> <p>1.5 Hannick Homes would firstly like to take this opportunity to congratulate the Parish Plan Steering Group on its work in preparing the draft Parish Plan. The document provides a comprehensive summary of the views, aspirations and concerns of the local community and will undoubtedly form a key part of the evidence base for the emerging Neighbourhood Plan. The Action Lists for each topic area within the Plan also provide a useful indication of the Parish Council's and wider community's priorities for the village going forward.</p> <p>1.6 Hannick Homes welcomes the recognition within the draft Parish Plan that Purton is identified as a Large Village within the emerging Wiltshire Core Strategy and will therefore need to accommodate additional housing growth between now</p>	<p>of in Jan/Feb 2017.</p> <p>The Parish Plan has provided a comprehensive summary of the views, aspirations and concerns of the local community the wider community's priorities, these have formed a key part of the evidence base for the emerging Neighbourhood Plan but only those points which related to land use and which also are considered achievable have been taken forward into the emerging Plan.</p>	<p>the relevant points have been raised in their email of the 14 August 2017.</p>

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	<p>and 2026. The Parish Plan also recognises that there is an existing need for affordable housing within the village and we welcome the acceptance that provision will need to be made for this. We do however question the scale of the affordable housing requirement listed within the draft Plan. The Plan lists a need for 24 affordable dwellings, as reported in the 2012 Parish Housing Needs Survey; it should be noted though that the Survey report (page 14) also makes clear that the Parish Housing Needs Survey is only part of the research required to build up an accurate picture of affordable housing need. The report advises that Wiltshire Council's Housing Needs Register, the Council's Strategic Housing Market assessment and the advice of staff who manage the Housing Register should all be taken into account also. We suggest the draft Parish Plan is amended to take into account these additional information sources, and the level of affordable housing need revised upwards accordingly.</p> <p>1.7 As the Parish Council is undoubtedly aware, the primary means by which affordable housing is likely to be delivered will be through cross subsidisation by market rate (private) housing within mixed tenure housing developments. We do not accept the suggestion within the draft Parish Plan that all of the village's housing requirement (both affordable and market rate) over the coming plan period can be accommodated within the village's settlement framework boundary. It is our view that a more detailed assessment is required before it can be concluded that the sites listed within the draft Parish Plan are available, deliverable (i.e. not overly constrained) and can accommodate the level of housing indicated. We also urge the Parish Council to take financial viability into account when assessing potential site allocations in order to try to maximise affordable housing delivery. As the Parish Council is undoubtedly aware, small infill sites tend to be less viable to develop and therefore deliver a low number, if any, affordable housing.</p> <p>1.8 It is our view that it is highly likely that there will be a need to</p>		

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	<p>accommodate some of the future development requirement on sustainably located sites adjacent to the settlement boundary. We recognise that it is not appropriate to identify such sites within the Parish Plan but would expect to see allocations for residential sites within the emerging Neighbourhood Plan.</p> <p>1.9 The draft Parish Plan makes reference to a need to ensure that there is adequate provision of accommodation for elderly people in Purton going forward. Hannick Homes would welcome the opportunity to engage with the Parish Council on this matter to determine if our land would be an appropriate location to accommodate some of this requirement.</p> <p>1.10 The draft Parish Plan makes reference to a need for a public park and possibly also additional allotment land within Purton, and suggests land behind Jewel's Ash (which we assume to be the land under Hannick Homes' ownership) as a possible suitable location. We would welcome a dialogue with the Parish Council in respect of this on the understanding that a public park could be brought forward on part of the site in conjunction with some housing development.</p> <p>1.11 When referring to land behind Jewel's Ash, the draft Parish Plan makes reference to the provision of a lake on the site, stating that it would 'help solve some of the surface and ground water problems' (pg 65). Although the wording is somewhat ambiguous, we assume this refers to localised flooding off-site. If this is the case, Hannick Homes would be prepared to incorporate surface water storage features on our site as part of any future development to attenuate surface water flows during heavy rainfall events, thus providing betterment to the current position.</p> <p>1.12 For the avoidance of doubt, the site being promoted by Hannick Homes does not suffer from surface water flooding or ground water issues. A detailed Flood Risk Assessment of the site has been undertaken by external hydrological engineers, and this assessment confirms that this is the case. Furthermore,</p>		

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	<p>Wiltshire Council's Land Drainage Officer and the Environment Agency were consulted as part of the Flood Risk Assessment, with both confirming that there are no records of historic flooding on the site. We suggest the text of the draft Parish Plan be amended to remove this ambiguity. Hannick Homes is prepared to liaise directly with the Parish Plan Steering Group to provide further clarification on this issue if required.</p> <p>Conclusion</p> <p>1.13 Hannick Homes respectfully requests that the comments outlined above are taken on board when finalising the Purton Parish Plan. We reiterate that our land at Witts Lane is available, unconstrained, sustainably located, and has the potential to deliver 40% affordable housing. If developed, the site also has the ability to deliver other community benefits identified as desirable within the draft Parish Plan (e.g. area of public open space, accommodation for the elderly, highway improvements to the Station Road/Witts Lane junction).</p> <p>1.14 The National Planning Policy Framework advocates the adoption of an inclusive and collaborative approach during the preparation of development plans, and we therefore look forward to working with Purton Parish Council during the Neighbourhood Plan preparatory process.</p> <p>Land at Witts Lane Purton Draft Parish Plan Consultation (November 2013)</p>		

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Pegasus/ Hannick Homes - Landscape and Visual Analysis

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	<p>DRAFT PURTON NEIGHBOURHOOD PLAN CONSULTATION REPRESENTATION SUBMISSION, (AUGUST 2017)</p> <p>LANDSCAPE AND VISUAL ANALYSIS ON BEHALF OF THE HANNICK HOMES LTD</p> <p>CONTENTS:</p> <div><div></div><div>Page No:</div><div><div>1. INTRODUCTION1</div><div>2. THE STUDY AREA AND ITS SURROUNDING CONTEXT3</div><div>3. DRAFT PURTON POLICY 4: TO PROTECT KEY LOCAL LANDSCAPES4</div><div>Overview4</div><div>Protection of Purton Common4</div><div>Topographic Considerations4</div><div>Visual Analysis6</div><div>4. SUMMARY AND CONCLUSIONS11</div></div></div> <p>APPENDICES:</p> <p>APPENDIX 1: SITE AND VIEWPOINT LOCATION PLAN</p> <p>APPENDIX 2: PHOTOVIEWS 1 TO 10</p> <p>APPENDIX 3: TOPOGRAPHY PLAN</p> <p>1. INTRODUCTION</p> <p>1.1 This landscape and visual analysis has been prepared on behalf of Hannick Homes</p> <p>Ltd for the consultation relating to the Draft Purton Neighbourhood Plan (June</p>	<p>Noted.</p>	<p>None needed.</p>

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	<p>2017) (hereafter referred to as DPNP) prepared by Purton Parish Council.</p> <p>1.2 The purpose of this analysis is to inform the consultation process regarding the landscape and visual sensitivities associated with 'Purton Policy 4: To protect key local landscapes' as set out in the DPNP. The draft policy states:</p> <p style="padding-left: 40px;">“The area shown in green on Map 5 is allocated as open space to remain undeveloped to preserve locally important views both to and from the escarpments to the north of the village, around Francombe Hill (known locally as High Hills), along the western side of the village up to and including the vista leading up to and around the ancient monument known as Ringsbury Camp. These views are shown on Map 5 which indicates sensitive views related to the existing built areas. Although not named specifically in the Purton Parish Plan consultation, the area named as Purton Common also provides a significant view, lying between Vasterne Hill, Hoggs Lane and Witts Lane is also shown on Map 5 and shall be protected from development.”</p> <p>1.3 The Map 5 - Key Local Landscapes from the Draft Purton Neighbourhood Plan is set out below.</p>		

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<div data-bbox="197 213 1164 855"> </div> <p>1.4 The introductory text to Purton Policy 4 notes that <i>“Much of the village of Purton sits on escarpments overlooking open countryside in a wide sweep.... Purton Parish Plan identified the need to protect these magnificent views and reduce the impact of development on the visually-sensitive skyline at the top of the village.”</i></p> <p>1.5 This landscape and visual analysis considers the extent and appropriateness of the land identified as “Escarpment” on Map 5 - Key Local Landscapes in the DPNP, with particular reference to land within Hannick Homes Ltd’s ownership which lies within the Study Area marked on the Site and Viewpoint Location Plan at Appendix 1.</p> <p>1.6 Relevant desk study information was obtained and reviewed, and a site visit to Purton and the surrounding area was carried out in August 2017 in order to</p>		

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	<p>inform this analysis. A series of representative Photoviews taken during this site visit, to illustrate the visual analysis within this report, are set out at Appendix 2.</p> <p>1.7 This report has been prepared by a Chartered Member of the Landscape Institute, with reference to best practice guidance, including Guidelines for Landscape and Visual Impact Assessment Third Edition (Landscape Institute and Institute of Environmental Management and Assessment, 2013) (GLVIA3). The analysis carried out considers a range of factors, including:</p> <ul style="list-style-type: none"> • topography; • landcover; • treecover; • extent and pattern of semi-natural habitats. • land use; • settlement pattern and human influence; • field boundaries and enclosure pattern; • landscape quality/condition; • General visibility - landform influences; tree and woodland cover; inter-visibility; skylines; • Landscape designations; and • Perceptual criteria. 		
	<p>2. THE STUDY AREA AND ITS SURROUNDING CONTEXT</p> <p>2.1 This Landscape and Visual Analysis has reviewed the landscape contained within the proposed 'Escarpment' designation outlined in the DPNP to consider whether the land owned by Hannick Homes Ltd (to the rear of Jewel's Ash / Witt's Lane) and any other surrounding land merits inclusion within the designated area, given its stated aims. As will be set out in this report, our analysis concludes that the parcel of land owned by Hannick Homes Ltd and the adjoining lower lying land which similarly benefits from strong visual and physical containment, should not be</p>	Noted but note response to 3.4 below.	None needed.

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	<p>part of the designated area. Within this report, and as identified on the Site and Viewpoint Location Plan at Appendix 1, this combined area of lower lying land which does not merit inclusion within the 'Escarpment' designation is referred to as the 'Study Area'.</p> <p>2.2 The Study Area lies between existing one and two storey residential development along Vasterne Close, Jubilee Estate, Witts Lane and Waites Mead Close. This existing residential development defines the eastern, northern and north-western boundaries of the Study Area. The southern and south western boundaries are defined by belts and blocks of vegetation, including tall trees of mixed native and coniferous species.</p> <p>2.3 The Study Area is crossed by maintained footpaths (Public Rights of Way) which frequently pass between low post and wire fencing which separates them from the adjoining vegetation. In places this vegetation includes brambles, docks, nettles, grasses and other common native plant and shrub species.</p> <p>2.4 The Study Area is not subject to any landscape designations at a regional or local level.</p> <p>2.5 To the south of the low lying Study Area, the landform steadily rises to reach a high point along a spur of higher land roughly aligned east to west. This area of higher land extends to the west and north-west of the Study Area to form an arc around the lower lying land to the north of Purton (refer to the Topography</p>	<p>From the north-west point of Site 1120 where it adjoins Vasterne Close, the site falls away by an estimated 25 feet to the most south-east point of the site. Whilst there are mature trees along the southern boundary, they are in a small fold/valley between the escarpment and the site, thus trees cannot be seen or form a visual barrier so the site can be clearly seen from the High Street (see Photoview 4).</p> <p>Agreed the land under control of Hannick Homes had been allowed to deteriorate.</p> <p>Agreed.</p> <p>Noted.</p>	<p>None needed.</p> <p>None needed.</p> <p>None needed.</p> <p>None needed.</p>

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	<p>Plan at Appendix 3). Whilst much of the settlement of Purton lies along the arc of higher land, the settlement also extends northwards along lower land around Widham.</p> <p>2.6 Purton has a Conservation Area which is broadly located around the eastern end of the High Street and across the fields and other buildings to the south-east of the village. The Study Area does not lie within or immediately adjacent to the Conservation Area.</p>	Agreed.	None needed.
	<p>3. DRAFT PURTON POLICY 4: TO PROTECT KEY LOCAL LANDSCAPES</p> <p><u>Overview</u></p> <p>3.1 The following sections of this report set out an analysis and critique of issues relating to 'Purton Policy 4: To protect key local landscapes' contained within the DPNP. The critique covers three topics:</p> <ul style="list-style-type: none"> the protection of Purton Common from development; the definition of the Purton 'Escarpment' and topographic analysis of the surrounding landform; and an analysis of the Key views to and from the Purton escarpment. <p>3.2 We demonstrate in relation to each topic, that the Study Area, identified on the Site and Viewpoint Location Plan at Appendix 1 of this report, either does not or should not fall within the proposed 'Escarpment' designation identified in the DPNP, which aims to protect locally important views to and from Purton.</p>	<p>This is misleading, Purton Common is an addition to the other views not the sole intent of Policy 4 as is clearly indicated in Map 5. Also, whilst analysis and photoviews have been provided looking out from the Purton escarpment, NONE have been provided looking in.</p> <p>From Map 5 the Study Area falls clearly within area of interest.</p>	<p>None needed.</p> <p>None needed.</p>

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	<p><u>Protection of Purton Common</u></p> <p>3.3 Purton Policy 4 of the DPNP describes an area “<i>lying between Vasterne Hill, Hoggs Lane and Witts Lane</i>” which “shall be protected from development”. For avoidance of doubt, whilst this broad description could also be mis-interpreted as including the land identified as ‘Study Area’ on the Site and Viewpoint Location Plan at Appendix 1 of this report, the text of Purton Policy 4 makes clear that the land to be protected from development is named as Purton Common ie land to the north of Vasterne Hill. Furthermore, ‘Map 5 - Key Local Landscapes’ within the DPNP, clearly shows Purton Common as lying between Row House Farm, Malthouse Farm and housing close to Common Farm. Therefore, both the text of Purton Policy 4 and the accompanying Map 5 make clear that the area to be protected from development lies between the north of Vasterne Hill, The Common, Witts Lane and Hoggs Lane and we recommend that the text of the policy is amended to clarify this.</p>	<p>There is no confusion, the roads Witts Lane, Hoggs Lane and Vasterne Hill only enclose the area of Purton Common. The only likely confusion may be is that the respondent is confusing Vasterne Close and Vasterne Hill.</p> <p>This specific area does not include Site 1120 Jewels Ash as that lies between Jubilee Estate, Witts Lane, Waite Meads Close and leads up into the escarpment.</p>	<p>None needed.</p>
	<p><u>Topographic Considerations</u></p> <p>3.4 As noted above, the Purton Policy 4 within the DPNP, seeks to protect the ‘<i>locally important views both to and from the escarpments to the north of the village</i>’. ‘Map 5 - Key Local Landscapes’ shows a large area of land to the north and west of Purton in green which is identified in the key as ‘Escarpment’, although the area identified varies both in steepness of slope and elevation from around 140m Above Ordnance Datum (AOD) to below 90m AOD. The north-eastern, north-western and western extents of the land identified as ‘Escarpment’, appear to be identified by footpaths, existing areas of built form within Purton or by the railway line. However, the rationale for some of the areas identified as the ‘Escarpment’ is unclear, in that the extent appears to cut across contours, footpaths and field boundaries. These anomalies, along with the lack of published evidence for how the proposed designation was created, give the impression that the ‘Escarpment’ identified on Map 5 of the DPNP has been identified arbitrarily or without a robust</p>	<p>It is considered that the 90m contour line (the 90m Ordnance Datum) best defines the lower level of the escarpment where it blends with the alluvial plain around north Purton. To best define this area (other than a vague line on a map), the boundaries of existing fields, roads and railway, though excluding areas already developed, that best fit this contour have been used to define the area.</p>	<p>Modify Map 5 to show the topography of the escarpment using contour lines. The evidence used to define the designated area to be added as Annex 12 to Purton ~ Planning for the Future together with the respective photoviews.</p>

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	<p>and transparent approach.</p> <p>3.5 Map 5 also identifies a further area land, shown in a darker green colour, which wraps around parts of the land form to the north and west of Purton, but is not labelled in the key, and therefore, it is not clear what this area is intended to signify. The eastern extent of this darker green area finishes abruptly and appears to be aligned with a footpath which descends from elevated land adjacent to Purton High Street towards the residential area along Vasterne Close / Jubilee Estate to the north of Purton. This footpath, and therefore the dark green area on Map 5, broadly descends at right angles to the contours of the land as it passes through an open field, such that there is no obvious rationale which identifies the difference between the land to the immediate east and west of the footpath. Again, these anomalies give the impression of an arbitrary approach to the creation of the designations shown on Map 5, with a lack of robust and published evidence for their creation.</p> <p>3.6 In order to analyse the landform and to identify the areas of escarpment around the settlement of Purton, we have produced a Topography Plan which is set out at Appendix 2. This graphically illustrates the land form in and around Purton. An area of higher land (shown in brown on the Topography Plan) extends in a broadly north to south alignment through Paven Hill to the north-west of the settlement, via the largely residential area of Dogridge, and continues to the south of the settlement, where it expands in width to encompass Ringsbury Camp and a number of hamlets. A spur of higher land also extends east along Purton High Street.</p> <p>3.7 The land form to the north of Purton descends down relatively steep slopes (identified by the relative closeness of the contours and by the beige and pale yellow colouration [sic] on the Topography Plan), before flattening out to a gently undulating vale landscape, broadly identified by the blue colouration.</p>	<p>The dark green band shown on Map 5 around the north and west side of the village is indicative to show the form of the escarpment. It is not precise. The interpretation by the respondent is obtuse to claim that the land immediately to the east and west of where the dark green band terminates on Map 5 is absolute in terms of delineation.</p> <p>Noted.</p> <p>Noted.</p>	<p>None needed.</p> <p>None needed.</p> <p>None needed.</p>

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	<p>3.8 The area of land which includes that owned by Hannick Homes Ltd is identified on the Topography Plan as Study Area. The widening contours and the blue colouration illustrate that the Study Area does not form part of the elevated escarpment on which parts of Purton lie. It carries the same broad topographic characteristics as the lower lying residential area around Widham to the north of the settlement of Purton.</p> <p>3.9 Given the above factors, we consider that the land identified on Map 5 of the DPNP as 'Escarpment' has been arbitrarily drawn and lacks published rigorous analysis for its creation. Furthermore, the land identified as Study Area in this report does not form part of the escarpment around Purton and should be excluded from any such designation on topographic grounds.</p>	<p>Site 1120 lies at the lower end of the escarpment and is important as it provides the setting for the escarpment.</p> <p>Noted but see comment above. The designated area although not part of the escarpment provides the very important setting to it.</p>	<p>None needed.</p> <p>None needed.</p>
	<p>Visual Analysis</p> <p>3.10 'Map 5 - Key Local Landscapes' of the DPNP identifies a series of 'Sensitive Views' to and from Purton. The Study Area (as defined in this report) neither lies within any 'Sensitive View' nor would appear as a backdrop to any of the identified views to or from Purton. Based on our field studies, we would agree with this analysis.</p> <p>3.11 The Study Area benefits from visual and physical containment provided by: its low lying topography; surrounding built form along Waites Mead Close, Witts Lane, Jubilee Estate and Vasterne Close; and by the substantial band of trees and other vegetation along much of its western and southern edges. As a result, there are limited publicly accessible locations from where the Study Area may be seen. Where there are publicly accessible views towards the Study Area, it is frequently seen in the context of the surrounding built form.</p> <p>3.12 Its lower lying topography means that the Study Area does not affect the skyline of views either to or from Purton. The explanatory text for Purton Policy 4</p>	<p>On the contrary, the Site 1120 lies clearly, and self-evidently in the "sensitive view".</p> <p>On the contrary, as indicated on Map 5 and from the High Street, the Site 1120 is visually intrusive and is widely accessible from several different RoWs.</p> <p>Policy 4 is referring to On the contrary, the Site 1120 lies clearly,</p>	<p>None needed.</p> <p>None needed.</p> <p>None needed.</p>

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	<p>in the DPNP notes the need to protect the ‘<i>visually-sensitive skyline at the top of the village</i>’, and as such there is a lack of a transparent and robust rationale for including the Study Area within the ‘Escarpment’ land identified in Purton Policy 4. Based on our visual analysis summarised below, we consider that the low lying Study Area should be excluded from the ‘Escarpment’ designation as it does not contribute to its stated aims.</p> <p>3.13 A series of representative Photoviews are set out at Appendix 2 to illustrate the range of views from within Purton, both towards the Study Area and the open countryside which lies beyond the elevated settlement. The locations from where these Photoviews were taken is shown on the Site and Viewpoint Location Plan at Appendix 1.</p> <p>3.14 Photoviews 1 and 2 are taken from within the Study Area itself and demonstrate the limited quality of the views available and the physical containment of the Study Area provided by built form topography and vegetation.</p> <p>3.15 Photoview 1 is taken from the Public Right of Way (PRoW) PURT50, looking in a north-westerly direction. The two storey properties at Vasterne Close generally restrict inter-visibility with the lower lying land, including Purton Common, beyond the settlement. A small part of the substantial belt of trees and shrubs which is located along the western side of the Study Area can be seen to the left of the Photoview. PRoW PURT50 is one of several footpaths which cross the Study Area. As can be seen in the Photoview, a fair extent of the lengths of these paths are defined by post and wire fencing along either side, with the remaining areas often containing brambles, docks, thistles, grasses and other native plants.</p> <p>3.16 Photoview 2 is also taken from within the Study Area, from PRoW PURT52 (looking in a southeastern direction) which traverses its northern section. From this location, the foreground of the view comprises the low lying Study Area itself,</p>	<p>and self-evidently in the “sensitive view” “Skyline is mentioned twice, once in connection with Site 66 and once in general terms. The selective quoting by Hannick Homes is unhelpful.</p> <p>This is just a minor view selected to justify some notion of containment. Any walk will reveal the shallowness of that “containment” analysis.</p> <p>Agreed both Photoviews 1 and 2 are taken within site 1120 and show an unkempt site with trees/foliage on both the west and east sides of the site providing a level of shielding to Vasterne Close and Waite Meads Close on either side.</p> <p>The site is unkempt but this is a site under the control of Hannick Homes who have not maintained or allowed it to be farmed</p> <p>Both Photoviews have been very selective to the actual view they present but if they had been taken looking south or south west towards the “skyline” of Francombe Hill then</p>	<p>None needed.</p> <p>None needed.</p> <p>None needed.</p> <p>None needed.</p>

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	<p>while properties along Waites Mead Close form the middle ground across much of the view. A band of vegetation provides a physical break between the Study Area and the steeply rising grassed field to its rear. Mature trees and the rear of properties located along Purton's High Street form the elevated skyline.</p> <p>3.17 Photoviews 3, 4 and 5 illustrate the typically limited glimpses towards the Study Area from publicly accessible areas within the settlement of Purton.</p> <p>3.18 Photoview 3 shows the glimpse towards the Study Area available along PRoW PURT54, leading from Witts Lane. Cables relating to overhead lines and a substation can be seen along the footpath, with more distant, elevated views largely prevented by the vegetation buffer along the southern edge of the Study Area. From other locations along Witts Lane, views towards the Study Area or the rising land form adjacent to the High Street, are generally prevented by existing properties or by garden vegetation.</p> <p>3.19 Photoviews 4 and 5 are from locations along Purton High Street, within the Purton Conservation Area.</p> <p>3.20 The glimpsed view shown in Photoview 4 is framed by stone walls and buildings, and looks across a foreground gap containing a dilapidated farm building. A small part of the Study Area can be seen in the middle distance, immediately adjacent to housing at Jubilee Estate and Witts Lane. Should the Study Area subsequently come forward for residential development, careful consideration would be given to the locations of additional tree planting, open space and built form within the proposed development. However, the existing view towards the Study Area already contains built development, such that any further housing development across the Study Area would replace the existing brief view of built form in the middle distance. The more distant view to the wider countryside beyond Purton would not be compromised.</p>	<p>the relationship and impact of the site with any development it would have on the escarpment would have been clearly shown.</p> <p>The glimpses are not well-served by this description which seeks to diminish the value. The glimpses are well-known and documented in the Parish Plan and are of well-known local interest</p> <p>Photoview 4 though is not well framed to show the landscape behind the farmyard, it shows that the complete site is visible from that location and would impact the sensitive view. Whilst the site is relatively low-lying it is the beginning of the bottom of the escarpment, see respondent's topography plan.</p> <p>Had the Photoview been taken from the farm gate at the back of the</p>	<p>None needed.</p> <p>None needed.</p> <p>None needed.</p>

	COMMENT	RESPONSE	NP MODIFICATION
	<p>3.21 Photoview 5 is taken from the slightly elevated footpath adjacent to a car park on the south side of the High Street. The view looks along PRoW PURT54 and is framed by existing buildings along the High Street. The low lying Study Area is largely screened by the woodland buffer which lies along its southern edge, although the upper parts of properties at Vasterne Close / Jubilee Estate can be seen. Should the Study Area subsequently come forward for residential development, careful consideration would be given to the locations of additional tree planting, open space and built form within the proposed development.</p> <p>However, the existing view towards the Study Area already contains built development, such that any further housing development across the Study Area would replace the existing brief view of built form in the middle distance. The more distant view to the wider countryside beyond Purton would not be compromised.</p>	<p>farmyard or at the end of the adjoining PURT54 footpath then the impact of site 1120 could have been more clearly seen and evaluated.</p> <p>The buffer along the southern edge of the site is not woodland but hedgerow which is cut annually. If, as proposed, 3.3 hectares are to be developed, it would be more prominent than the existing houses behind and so have a greater visual impact on the escarpment.</p>	None needed.
	<p>3.22 Photoview 6 is taken from the most elevated part of PRoW PURT108, close to its entrance from Hoggs Lane. The elevated open fields, which lie adjacent to the rear of properties along Purton's High Street, form the foreground to the wide ranging view across the lower lying landscape beyond the settlement. The lower lying Study Area is largely screened by the existing woodland buffer along its western side. The upper parts of buildings on lower lying land within the Purton settlement boundary appear in the middle ground of the view, with more distant settlements visible behind. Should the Study Area come forward for development, it is anticipated that the majority of the new buildings would be hidden in this view by intervening vegetation. Any glimpses of roof tops would form a small part of the wider view and would be seen in the immediate context of other buildings within Purton. This would maintain the quality of the existing view.</p>	<p>The woodland buffer shown in the Photoview is at the back (northern edge) of the site and comprises trees situated behind the three houses in Jewels Ash but these would have to be felled to provide access to site 1120.</p>	None needed.
	<p>3.23 Photoview 7 is taken from across a field gate close to the most elevated section of Hoggs Lane. Other views from this single track road are generally prevented by the tall vegetation along much of its length. Small parts of the Study</p>	<p>The lay of the land at the top of Hoggs Lane next to the converted Chapel prevents site 1120 from</p>	None needed.

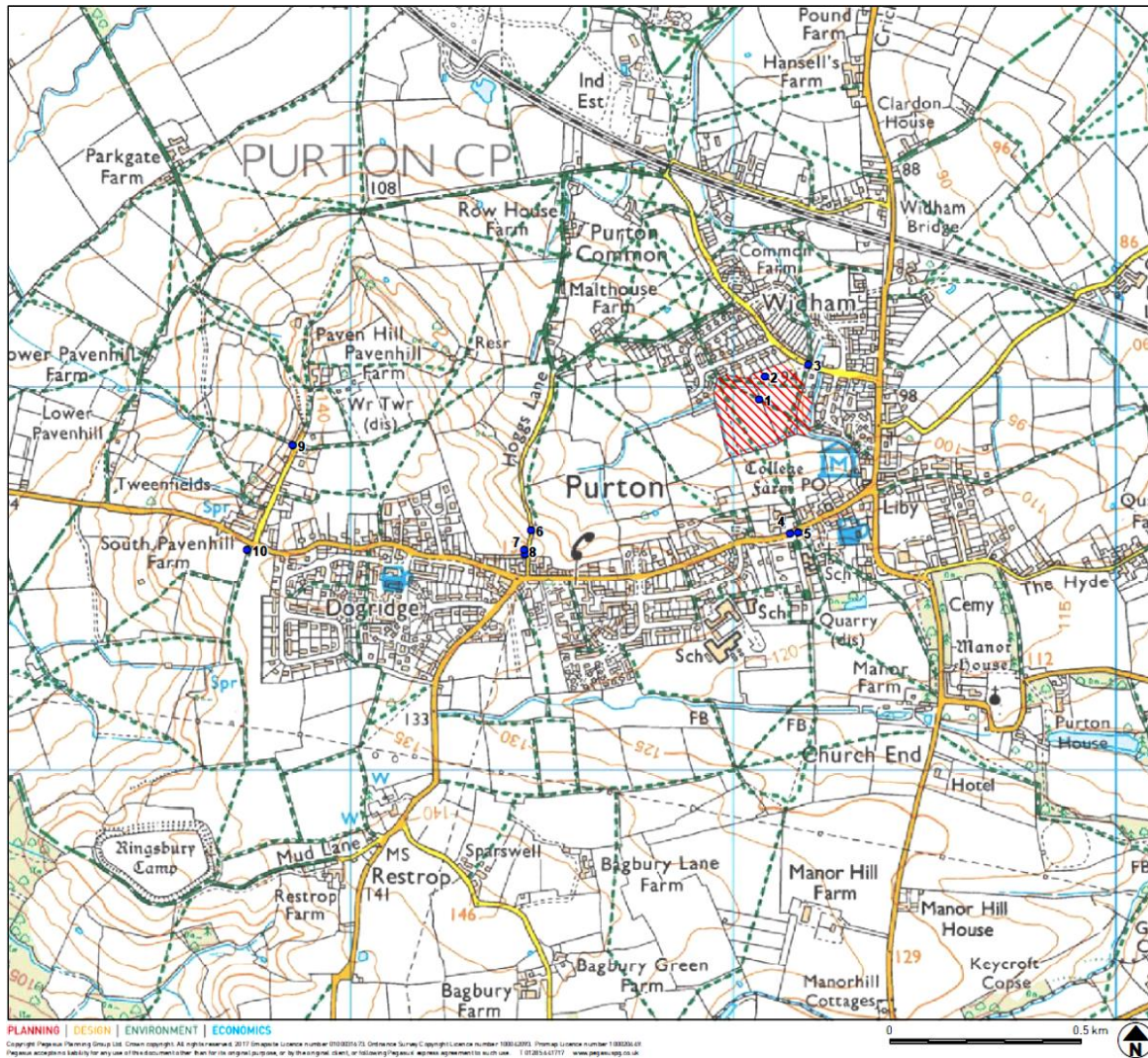
	COMMENT	RESPONSE	NP MODIFICATION
	<p>Area can be glimpsed in the middle ground of this view, between the tall vegetation buffer along its southern and western edges and the housing on other lower lying land in Purton. A series of poles and overhead lines cut across the landscape and the necessarily lower vegetation underneath the overhead line allows a brief glimpse into the Study Area and of the housing beyond. Should the Study Area come forward for development, it is anticipated that the majority of the new buildings would be hidden in this view by intervening vegetation. Any glimpses of roof tops would form a small part of the wider view and would be seen in the immediate context of other buildings within Purton. It is anticipated that the quality of the existing view would be maintained.</p> <p>3.24 Photoviews 8, 9 and 10 look at the quality of views from other publicly accessible, elevated locations in and around Purton. All three views are from PRow and generally provide views into the wider countryside which contains little or no built form. These views contrast with the views illustrated by Photoviews 1 to 7 in which the properties adjacent to the Study Area provide a context of existing built form, such that any new development on the Study Area would be compatible with the existing view.</p> <p>3.25 In addition to the Photoviews 1 to 10, consideration was given to other views available from the surrounding network of PRow and other public vantage points in the vicinity of Purton.</p> <p>3.26 From lower lying elevations, it was found that the network of hedgerows, trees and other vegetation provide a fairly extensive screen towards the Study Area.</p>	<p>being seen easily. However had the Photoview been taken from footpath PUR61 or from Francombe Hill then the impact of and development on site 1120 would be seen.</p> <p>The hedge commented on is cut at least annually affording better near and middle views. The screening is entirely dependent on land management by different landowners over whom Hannick Homes has no control.</p> <p>In other words, the Site 1120 lies in the middle of the only significant green space within the built form of the village ~ a unique and accessible open space.</p> <p>It is disappointing that more photo views were not taken along Upper Pavenhill or around Purton Hill to Francombe Hill, the later would have shown the impact of any development at site 1120 has on the escarpment.</p>	<p>None needed.</p> <p>None needed.</p> <p>None needed.</p>

	COMMENT	RESPONSE	NP MODIFICATION
	<p>3.27 The existing woodland buffers along the southern and western boundaries of the Study Area also provide a high degree of screening from some elevated locations. Where there were glimpses into parts of the Study Area, for example from upper sections of PRow PURT54, the middle range of the views typically contained views of existing properties within the vicinity of the Study Area. Should the Study Area come forward residential development, careful consideration would be given to the most appropriate locations for public open spaces and the location of proposed properties, set within a comprehensive landscape framework, such that the development would sit comfortably within its existing context and would not compromise existing views towards the Study Area.</p> <p>3.28 In summary, the visual analysis of views available towards the Study Area and from within the area of the proposed 'Escarpment' designation in the DPNP, illustrates that the Study Area does not form an important part of views to and from the elevated areas of land around Purton. The lower lying nature of the Study Area's topography and the extent of its visual and physical containment by existing residential development within the settlement of Purton and by the substantial woodland buffer along much of its southern and western edges, means that there is no obvious and robust rationale for the Study Area to be included within the 'Escarpment' designation as set out within the DPNP. Indeed, Map 5 within the DPNP does not identify a 'Sensitive View' which includes the Study Area. We therefore contend that it should be removed from the proposed designation.</p>	<p>Also missing from the analysis are any Photoviews looking in toward the escarpment from the footpaths and roads both north and west of the village to show the distinctive skyline of the village. This is a major oversight in a Landscape Survey.</p> <p>Past experiences suggest these aspirations are for boosting the Site 1120 but have little likelihood of coming into being in any planning application.</p> <p>This assertion is based on mis-reading Policy 4 and Map 5. The arrows on Map 5 are indicative only of the sensitive views around the escarpment. Add an extra arrow on Map 5 pointing north east over site 1120 to remove any confusion.</p>	<p>None needed.</p> <p>None needed.</p> <p>Add an extra arrow on Map 5 pointing north east over site 1120.</p>


	COMMENT	RESPONSE	NP MODIFICATION
	<p>4. SUMMARY AND CONCLUSIONS</p> <p>4.1 This landscape and visual analysis has been prepared on behalf of Hannick Homes Ltd for the consultation relating to the Draft Purton Neighbourhood Plan (June 2017) prepared by Purton Parish Council.</p> <p>4.2 The purpose of this analysis is to inform the consultation process regarding the landscape and visual sensitivities associated with 'Purton Policy 4: To protect key local landscapes' as set out in the DPNP.</p> <p>4.3 This report has been prepared by a Chartered Member of the Landscape Institute, with reference to best practice guidance (GLVIA3).</p> <p>4.4 Within this report, and as identified on the Site and Viewpoint Location Plan at Appendix 1, an area of lower lying land which does not merit inclusion within the 'Escarpment' designation defined in the DPNP is referred to as the 'Study Area'. The Study Area lies between existing one and two storey residential development along Vasterne Close, Jubilee Estate, Witts Lane and Waites Mead Close. This existing residential development defines the eastern, northern and north-western boundaries of the Study Area. The southern and south western boundaries are defined by belts and blocks of vegetation, including tall trees of mixed native and coniferous species.</p> <p>4.5 The Study Area is crossed by maintained footpaths (Public Rights of Way).</p> <p>4.6 The Study Area is not subject to any landscape designations at a regional or local level.</p>	<p>From the north-west point of Site 1120 where it adjoins Vasterne Close, the site falls away by an estimated 25 feet to the most south-east point of the site. Whilst there are mature trees along the southern boundary, they are in a small fold/valley between the escarpment and the site, thus trees cannot be seen or form a visual barrier so the site can be clearly seen from the High Street (see Photoview 4).</p>	<p>None needed.</p>


	COMMENT	RESPONSE	NP MODIFICATION
	<p>4.7 To the south of the low lying Study Area, the landform steadily rises to reach a high point along a spur of higher land roughly aligned east to west. This area of higher land extends to the west and north-west of the Study Area to form an arc around the lower lying land to the north of Purton.</p> <p>4.8 The reports set out an analysis and critique of issues relating to 'Purton Policy 4: To protect key local landscapes' contained within the DPNP. The critique covers three topics:</p> <ul style="list-style-type: none"> the protection of Purton Common from development; the definition of the Purton 'Escarpment' and topographic analysis of the surrounding landform; and an analysis of the Key views to and from the Purton escarpment. <ul style="list-style-type: none"> With regard to the protection of Purton Common, Purton Policy 4 of the DPNP describes an area "lying between Vasterne Hill, Hoggs Lane and Witts Lane" which "shall be protected from development". 	<p>Noted.</p> <p>Whilst analysis and photoviews have been provided looking out from the Purton escarpment, NONE have been provided looking in.</p>	<p>None needed.</p> <p>None needed.</p>
	<p>For avoidance of doubt, whilst this broad description could also be mis-interpreted as including the land identified as Study Area, the text of Purton Policy 4 and the accompanying Map 5 makes it clear that the land to be protected from development is named as Purton Common which lies between the north of Vasterne Hill, The Common, Witts Lane and Hoggs Lane. We recommend that the text of the policy is amended to clarify this point.</p> <p>4.10 With regard to topographic considerations, we consider that the land identified on Map 5 of the DPNP as 'Escarpment' has been arbitrarily drawn and lacks published rigorous analysis for its creation. Furthermore, the land identified</p>	<p>There is no confusion, the roads Witts Lane, Hoggs Lane and Vasterne Hill only enclose the area of Purton Common. The only likely confusion may be is that the respondent is confusing Vasterne Close and Vasterne Hill.</p> <p>It is considered that the 90m contour line (the 90m Ordnance Datum) best defined the lower level</p>	

	COMMENT	RESPONSE	NP MODIFICATION
	<p>as Study Area in this report does not form part of the escarpment around Purton and should be excluded from any such designation on topographic grounds.</p> <p>4.11 With regard to protection of sensitive views, the visual analysis of views available towards the Study Area and from within the area of the proposed 'Escarpment' designation in the DPNP, illustrates that the Study Area does not form an important part of views to and from the elevated areas of land around Purton. The lower lying nature of the Study Area's topography and the extent of its visual and physical containment by existing residential development within the settlement of Purton and by the substantial woodland buffer/vegetation along much of its southern and western edges, means that there is no obvious and robust rationale for the Study Area to be included within the 'Escarpment' designation as set out within the DPNP. Indeed, Map 5 within the DPNP does not identify a 'Sensitive View' which includes the Study Area. We therefore contend that it should be removed from the proposed designation.</p> <p>4.12 Given the analysis contained within this report, we consider that the Study Area does not contribute to the stated aims of 'Purton Policy 4 - To Protect local landscapes', namely the preservation of locally important views both to and from the escarpments to the north of Purton. The Study Area should therefore be excluded from this proposed designation.</p>	<p>of the escarpment where it blends with the alluvial plain around north Purton. To best define this area (other than a vague line on a map), the boundaries of existing fields, roads and railway, though excluding areas already developed, that best fit this contour have been used to define the area.</p> <p>Disagree, the Photoview 4 provided in Appendix 3 of the Landscape Report, though is not a good example, shows that the complete site is visible from that location and would impact on the sensitive view. Whilst the site is relatively low lying it is the beginning of the bottom of the escarpment, see respondent's topography plan.</p> <p>The so called substantial woodland buffer (a few trees) is at the back of the three houses that front onto Witts Lane but which would have to be removed to gain access to the site. The hedgerow on the south of the site is cut at least annually and not high enough to provide a visual barrier.</p>	

COMMENT	RESPONSE	NP MODIFICATION
<div>APPENDIX 1 - SITE AND VIEWPOINT LOCATION PLAN</div> <div></div> <div><p>PLANNING DESIGN ENVIRONMENT ECONOMICS</p><p><small>Copyright Pegasus Planning Design Ltd. All rights reserved. No part of this publication may be reproduced, stored in a retrieval system, or transmitted, in any form or by any means, electronic, mechanical, photocopying, recording, or by any information storage or retrieval system, without prior written permission from Pegasus Planning Design Ltd. 01285 645777 www.pegasusapp.co.uk</small></p></div>		
<div><div><div>KEY</div><div><div><div></div><div>Study Area</div></div><div><div></div><div>Viewpoint Location</div></div></div></div><div><div>Revision:</div><div>First Issue- 09/08/2017 AD</div></div><div><div>Site & Viewpoint Location Plan</div><div>Land at Witts Lane, Purton</div></div><div><div>Client: Hannick Homes [Swindon]</div><div>DRWG No: P17-1896_02</div><div>Sheet No: -</div><div>REV: -</div><div>Drawn by: AD</div><div>Approved by: HD</div><div>Date: 09/08/2017</div><div>Scale: 1:10,000 @ A3</div><div><div>Pegasus</div><div>Environment</div></div></div></div>		

KEY

 Study Area

 Viewpoint Location

Revisions:

First Issue: 09/08/2017 AD

Site & Viewpoint Location Plan

Land at Witts Lane, Purton

Client: Hannick Homes (Swindon)

DRWG No: **P17-1896_02** Sheet No: - REV: -


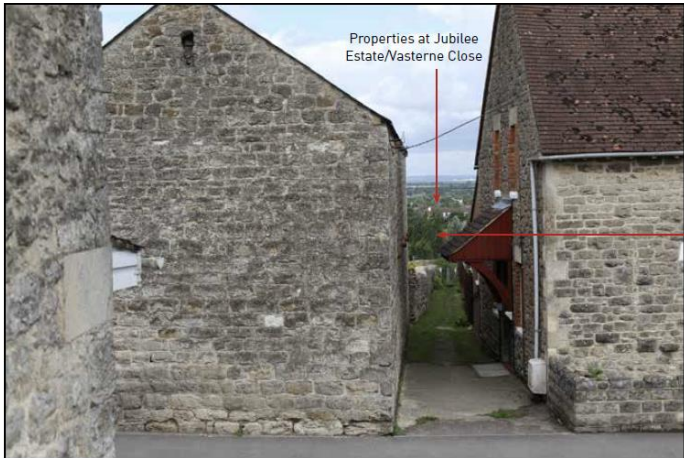
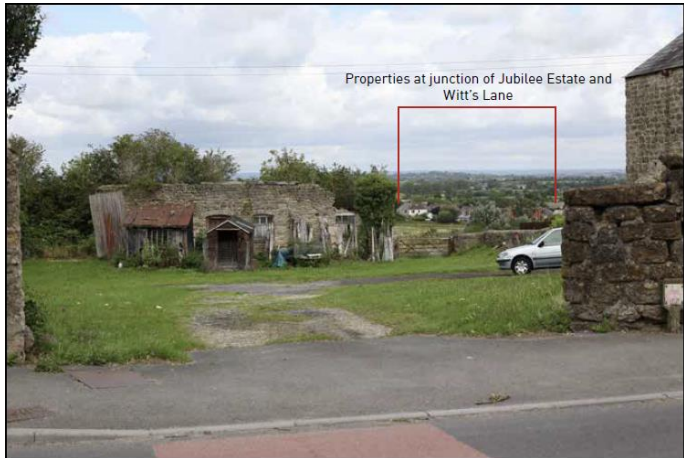

Drawn by: AD Approved by: HD



Date: 09/08/2017

Scale: 1:10,000 @ A3

Pegasus
Environment

	COMMENT	RESPONSE	NP MODIFICATION
	<p>APPENDIX 2 - PHOTOVIEWS 1 TO 10</p> <div data-bbox="197 280 1760 735"> <p>Woodland belt providing visual and physical enclosure</p> <p>Properties along Vasterne Close</p> <p>Public Right of Way PURT50</p> </div> <p>Photoview 1. View from centre of lower lying land, looking north-west</p> <div data-bbox="197 794 1760 1246"> <p>Public Right of Way PURT52</p> <p>Properties along Waites Mead Close</p> <p>Purton Museum</p> <p>Elevated land adjacent to properties along High Street</p> </div> <p>Photoview 2. View from footpath close to northern edge of lower lying land, looking south-east</p>		

	COMMENT	RESPONSE	NP MODIFICATION
	<div data-bbox="197 252 1025 711">  <p data-bbox="600 263 728 311">Woodland buffer between lower lying and elevated land</p> <p data-bbox="907 542 996 574">Public Right of Way PURT54</p> </div> <p data-bbox="197 718 936 746">Photoview 3. Glimpsed view from Witts Lane, along public footpath</p> <div data-bbox="197 805 1025 1265">  <p data-bbox="537 837 683 869">Properties at Jubilee Estate/Vasterne Close</p> <p data-bbox="918 1029 1008 1045">Woodland buffer</p> </div> <p data-bbox="197 1272 900 1329">Photoview 5. Glimpsed view from elevated footway on southern side of High Street, looking along Public Right of Way PURT54</p>	<div data-bbox="1084 252 1765 711">  <p data-bbox="1422 319 1691 351">Properties at junction of Jubilee Estate and Witt's Lane</p> </div> <p data-bbox="1084 718 1756 775">Photoview 4. Glimpsed view from High Street, Purton, looking north</p> <div data-bbox="1075 805 1765 1302">  <p data-bbox="1108 1316 1736 1444">Parish Council Photo taken from same location as Photoview 4 but zoomed in looking over farm gate which clearly shows site 1120. Green foliage horizontally across field is Public Right of Way PURT52.</p> </div>	

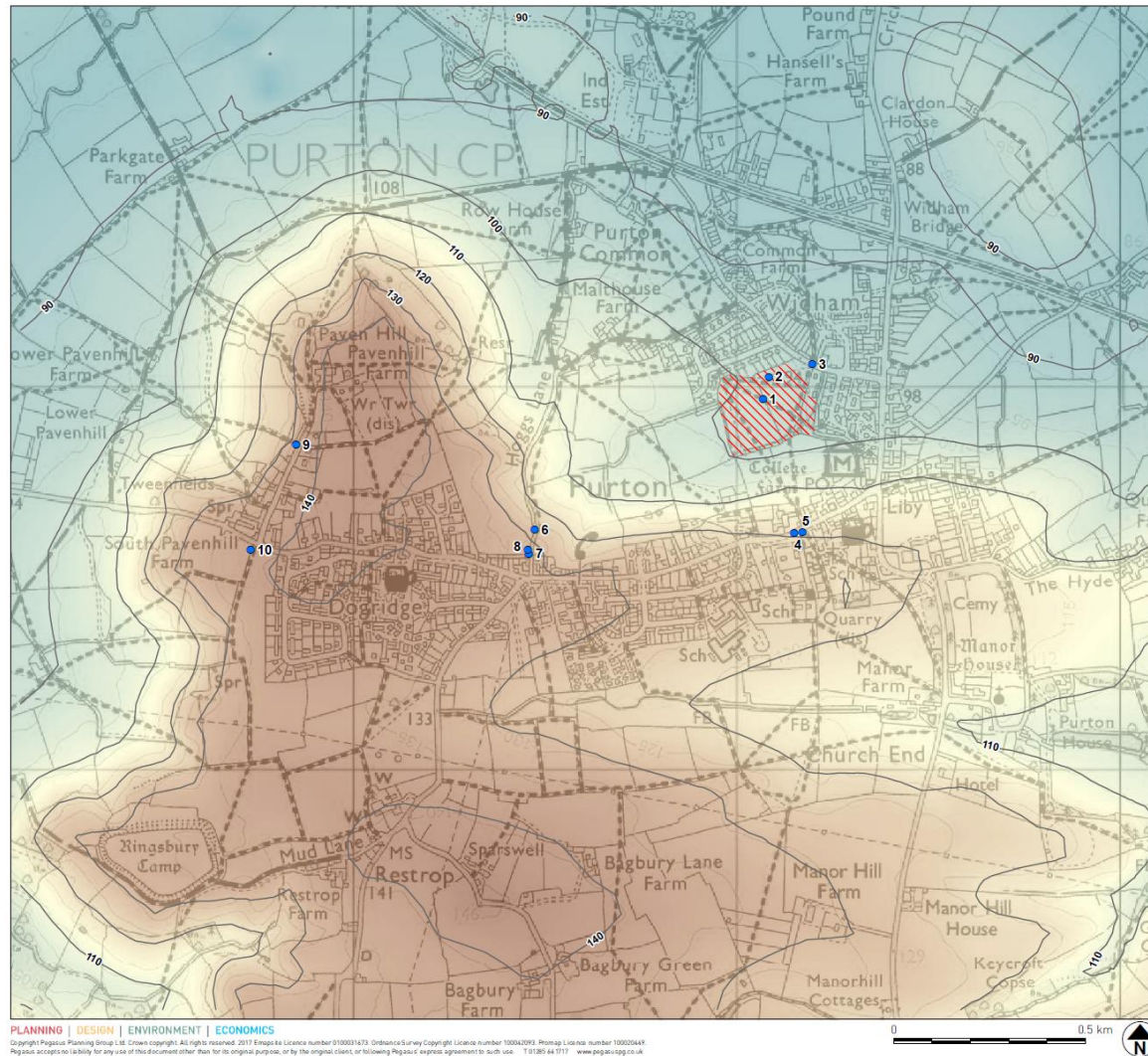
	COMMENT	RESPONSE	NP MODIFICATION
	<div data-bbox="197 252 1778 715">  <p>Existing development on lower lying land at Purton</p> <p>Woodland buffer largely screening lower lying land</p> <p>Elevated land adjacent to properties along High Street</p> </div> <p data-bbox="197 719 1012 746">Photoview 6. View from Public Right of Way PURT108, close to Hoggs Lane</p> <div data-bbox="197 774 1778 1236">  <p>Existing development on lower lying land at Purton</p> <p>Woodland buffer along western edge of lower lying land</p> </div> <p data-bbox="197 1241 1131 1268">Photoview 7. View over field gate on Hoggs Lane, looking north-east from escarpment</p>		

	COMMENT	RESPONSE	NP MODIFICATION
	<p data-bbox="817 279 1164 295">View of open countryside with only distant development</p>  <p data-bbox="199 721 1178 746">Photoview 8. View from Public Right of Way PURT61, looking north-west from escarpment</p> <p data-bbox="611 785 1137 801">View of open countryside with only isolated development visible in the middle ground</p>  <p data-bbox="199 1240 1518 1265">Photoview 9. View from Public Right of Way PURT40, off Upper Pavenhill, looking north-west from escarpment</p>		

	COMMENT	RESPONSE	NP MODIFICATION
	<div data-bbox="197 252 1778 715" data-label="Image"> </div> <p data-bbox="197 719 1120 746">Photoview 10. View from Public Right of Way PURT95, looking west from escarpment</p>		

COMMENT

APPENDIX 3 - TOPOGRAPHY PLAN



RESPONSE

NP MODIFICATION

	COMMENT	RESPONSE	NP MODIFICATION
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Gladmans

	COMMENT	RESPONSE	NP MODIFICATION
	<p>Legal Requirements</p> <p>Before a neighbourhood plan can proceed to referendum it must be tested against a set of basic conditions set out in paragraph 8(2) of Schedule 4b of the Town and Country Planning Act 1990 (as amended). The basic conditions that the PNP must meet are as follows:</p> <p><i>(a) Having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the order.</i></p> <p><i>(d) The making of the order contributes to the achievement of sustainable development.</i></p> <p><i>(e) The making of the order is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area).</i></p> <p><i>(f) The making of the order does not breach, and is otherwise compatible with, EU obligations.</i></p>	<p>Extract from paragraph 8(2) of Schedule 4b of the Town and Country Planning Act 1990 noted for reference.</p>	<p>None needed.</p>
	<p>National Planning Policy Framework and Planning Practice Guidance</p> <p>The National Planning Policy Framework (the Framework) sets out the Government's planning policies for England and how these are expected to be applied. In doing so it sets out the requirements for the preparation of neighbourhood plans to be in conformity with the strategic priorities for the wider area and the role in which they play in delivering sustainable development to meet development needs.</p> <p>At the heart of the Framework is a presumption in favour of sustainable development, which should be seen as a golden thread through both plan-making</p>	<p>Comments from the NPPF 2012 noted for reference.</p>	<p>None needed.</p>

	COMMENT	RESPONSE	NP MODIFICATION
	<p>and decision-taking. For plan-making this means that plan makers should positively seek opportunities to meet the development needs of their area and Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change. This requirement is applicable to neighbourhood plans.</p> <p>The recent Planning Practice Guidance (PPG) updates make clear that neighbourhood plans should conform to national policy requirements and take account the latest and most up-to-date evidence of housing needs in order to assist the Council in delivering sustainable development, a neighbourhood plan basic condition.</p> <p>The application of the presumption in favour of sustainable development will have implications for how communities engage with neighbourhood planning. Paragraph 16 of the Framework makes clear that Qualifying Bodies preparing neighbourhood plans should develop plans that support strategic development needs set out in Local Plans, including policies for housing development and plan positively to support local development.</p> <p>Paragraph 17 further makes clear that neighbourhood plans should set out a clear and positive vision for the future of the area and policies contained in those plans should provide a practical framework within which decisions on planning applications can be made with a high degree of predictability and efficiency. Neighbourhood plans should seek to proactively drive and support sustainable economic development to deliver the homes, jobs and thriving local places that the country needs, whilst responding positively to the wider opportunities for growth.</p> <p>Paragraph 184 of the Framework makes clear that local planning authorities will need to clearly set out their strategic policies to ensure that an up-to-date Local Plan is in place as quickly as possible. The Neighbourhood Plan should ensure that it is aligned with the strategic needs and priorities of the wider area and plan positively to support the delivery of sustainable growth opportunities.</p>		

	COMMENT	RESPONSE	NP MODIFICATION
	<p>Planning Practice Guidance</p> <p>It is clear from the requirements of the Framework that neighbourhood plans should be prepared in conformity with the strategic requirements for the wider area as confirmed in an adopted development plan. The requirements of the Framework have now been supplemented by the publication of Planning Practice Guidance (PPG).</p> <p>On 11th February 2016, the Secretary of State (SoS) published a series of updates to the neighbourhood planning chapter of the PPG. In summary, these update a number of component parts of the evidence base that are required to support an emerging neighbourhood plan.</p> <p>On 19th May 2016, the Secretary of State published a further set of updates to the neighbourhood planning PPG. These updates provide further clarity on what measures a qualifying body should take to review the contents of a neighbourhood plan where the evidence base for the plan policy becomes less robust. As such it is considered that where a qualifying body intends to undertake a review of the neighbourhood plan, it should include a policy relating to this intention which includes a detailed explanation outlining the qualifying bodies anticipated timescales in this regard.</p> <p>Further, the PPG makes clear that neighbourhood plans should not contain policies restricting housing development in settlements or preventing other settlements from being expanded. It is with that in mind that Gladman has reservations regarding the PNP's ability to meet basic condition (a) and this will be discussed in greater detail throughout this response.</p>	<p>Generally noted</p> <p>Generally noted</p> <p>Generally noted</p> <p>Generally noted</p>	<p>None needed.</p> <p>None needed.</p> <p>None needed.</p> <p>None needed.</p>
	<p>Relationship to Local Plan</p> <p>The current adopted plan that covers the Purton Neighbourhood Plan area and the</p>	<p>Generally noted</p>	<p>None needed.</p>

	COMMENT	RESPONSE	NP MODIFICATION
	<p>development plan which the PNP will be tested against is the Wiltshire Core Strategy, adopted in January 2015. This plan sets the over-arching spatial strategy for Wiltshire and covers the period 2011 to 2026.</p> <p>Within this plan, Purton is designated as a large village with a limited range of employment, services and facilities. Development in these settlements will be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities. Whilst recognising this, Gladman submit that the Parish Council could take the opportunity in producing the PNP to aspire for growth. If this opportunity is not taken it is likely that Purton will find itself caught in a 'sustainability trap.' This was considered in the Taylor Review¹ and defined as:</p> <p><i>'Smaller and rural communities [are considered] as unsustainable in principle. Local authorities are now increasingly defining settlement hierarchies as a basis for determining the permissible scale and nature of sustainable development. However, few if any have devised any means by which a settlement at a lower level can migrate up the sustainability ladder. This all results in a 'sustainability trap'. In essence, otherwise beneficial development can only be approved if the settlement is considered sustainable in the first place.'</i></p>	<p>Generally noted but the village has an existing road network that could not support such as aspiration</p>	<p>None needed.</p>
	<p>Purton Neighbourhood Plan</p> <p>This section highlights the key issues that Gladman would like to raise with regards to the content of the PNP as currently proposed. It is considered that some policies do not reflect the requirements of national policy and guidance, Gladman have therefore sought to recommend a series of alternative options that should be explored prior to the Plan being submitted for Independent Examination</p>	<p>Noted.</p>	<p>None needed.</p>
	<p>Policy 4: To protect key local landscapes</p>		

	COMMENT	RESPONSE	NP MODIFICATION
	<p>This policy is seeking to protect a large area of land to ensure it remains undeveloped and preserves locally important views. It is considered that this does not conform with the Framework and this policy will need to be revisited to ensure compliance with national policy. Paragraph 113 of the Framework states that:</p> <p><i>‘Local planning authorities should set criteria based policies against which proposals for any development on or affecting protected wildlife or geodiversity sites or landscape areas will be judged. Distinctions should be made between the hierarchy of international, national and locally designated sites, so that protection is commensurate with their status and gives appropriate weight to their importance and the contribution that they make to wider ecological networks.’</i></p> <p>Whilst this policy refers to local authorities in terms of plan making this equally applies to qualifying bodies in preparing neighbourhood plans. It is considered inappropriate to impose a blanket restriction on land designated for protection locally and sufficient flexibility should be added to this policy to meet the requirements of the Framework.</p> <p>Policy 5: Settlement Identity</p> <p>This policy is seeking to implement what is essentially a strategic gap between the</p>	<p>Purton is built on a hill top which is a major geological feature of the village providing spectacular views out across the alluvial plains around the village.</p> <p>Wiltshire Council’s comment: “With regards to the overarching goal and aims/objectives relating to the environment that are set out in the table on page 20 of the plan, it is encouraging to see that there is an intention to protect existing nature conservation sites and to seek opportunities for ecological gain. Is it possible to include an aim within the aforementioned table that clearly follows on from the overarching goal and which stipulates the intention to identify and implement ecological enhancements wherever possible, such as part of proposed developments, in order to work towards a net gain for biodiversity rather than just protecting existing ecological features/sites.”</p> <p>The policy does not prevent</p>	<p>Wording change required to include Wiltshire Council’s proposal.</p> <p>None needed.</p>

	COMMENT	RESPONSE	NP MODIFICATION
	<p>Swindon urban area and the settlements within the neighbourhood plan area. There is no such strategic gap within the Wiltshire Core Strategy and it is considered that this is trying to introduce a strategic policy, is beyond the remit of neighbourhood plans.</p> <p>Gladman submit that new development can often be located in countryside gaps without leading to the physical or visual merging of settlements, eroding the sense of separation between them or resulting in the loss of openness and character. In such circumstances, we would question the purpose of the proposed gap designations, particularly if this would prevent the development of otherwise sustainable and deliverable housing sites to meet the Council's housing needs. Further, the PPG makes clear that neighbourhood plans should not contain policies restricting housing development in settlements or preventing other settlements from being expanded</p>	<p>development but aims to retain open countryside to prevent coalescence with Swindon and the potential loss of the identity, character, culture and history of Purton and the other smaller settlements to the west of Swindon.</p>	
	<p>Policy 12: Development Principles</p> <p>This policy is seeking for development in identified locations within the settlement boundary. It is stated that housing should be brought forward on these locations before land outside the existing settlement boundary. This does not conform with the Framework which seeks to significantly boost the supply of housing. In stating that development inside the settlement boundary should come forward before land outside the existing settlement boundary this could unnecessarily restrict otherwise sustainable development.</p> <p>Further, the supporting text for the policy states that these are site allocations however Gladman submit that as development would already be permitted within the settlement boundaries it is considered unnecessary to include allocations within the settlement boundary, subject to a development proposal according with the other policies within the plan.</p>	<p>Agreed the policy requires housing within the settlement boundary to be brought forward before land outside the settlement boundary may be counter-productive and prevent development taking outside the settlement boundary if not all the sites are developed.</p> <p>The sites are identified in the SHLAA 2012 and draft SHLAA 2015 as being available but does not allocate these sites which is what Policy 12 does.</p>	<p>Revise wording in Policy 12 to remove this restriction.</p> <p>None Needed.</p>

	COMMENT	RESPONSE	NP MODIFICATION
	<p>Policy 13: Development outside settlement boundary</p> <p>This policy allocates an area of search for housing. The Parish Council have undertaken a site assessment to complement this policy however Gladman suggests that the Parish Council revisit this assessment. It is currently overly complicated assessing sites against some criteria that it is considered would not affect the delivery of sustainable development. Further work will be necessary to demonstrate why the location being progressed is the most suitable when considered against reasonable alternatives. It is currently not clear why some sites that scored similarly in the site assessment have been rejected and the reasons for why the proposed area of search has been taken forward.</p>	<p>The view is noted. The analysis in Annex 8 in Purton ~ Planning for the Future ranks the sites relative to each other against criteria identified by residents as important. The proposed area of search (term to be replaced) came out top of that ranking.</p>	<p>Ranking of the sites relative to each other and not against a set limit to be clarified in Annex 7 of Purton ~ Planning for the Future</p>
	<p>Conclusions</p> <p>Gladman recognises the role of neighbourhood plans as a tool for local people to shape the development of their local community. However, it is clear from national guidance that these must be consistent with national planning policy and the strategic requirements for the wider authority area. Through this consultation response, Gladman has sought to clarify the relation of the PNP as currently proposed with the requirements of national planning policy and the wider strategic policies for the wider area.</p> <p>Gladman is concerned that the plan in its current form does not comply with basic condition (a). The plan does not conform with national policy and guidance. Gladman hopes you have found these representations helpful and constructive. If you have any questions do not hesitate to contact me or one of the Gladman team.</p>	<p>This is appreciated</p> <p>The Plan does not conflict with national or local policies but the changes recommended are to be incorporated.</p>	<p>Changes identified above to be implemented.</p>

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Emery Planning on behalf of Wainhomes (South West)

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	<p>Contents:</p> <table><tr><td>1. Introduction</td><td>1 <i>(page numbers from original)</i></td></tr><tr><td>2. The Basic Conditions</td><td>1</td></tr><tr><td>3. National Planning Policy and Guidance</td><td>2</td></tr><tr><td>4. The Development Plan</td><td>10</td></tr><tr><td>5. Response to draft plan</td><td>13</td></tr><tr><td>6. Conclusion</td><td>23</td></tr><tr><td>7. Appendices</td><td>23</td></tr></table> <p>1. Introduction</p> <p>1.1 Emery Planning is instructed to submit representations to the Purton Neighbourhood Plan (hereafter referred to as the ‘PNP’) on behalf of the Wainhomes (South West) Holdings Limited (hereafter referred to as ‘Wainhomes’). Wainhomes have an interest on the land at Widham Farm, Purton, which is located on the northern edge of the village and is bounded by the railway line to the north, the existing urban area to the west and south and Station Road to the east. The site is referenced 442 in the ‘Purton-Planning for the Future report’. A site location plan is provided at appendix EP1.</p> <p>1.2 It is clear that the Neighbourhood Plan Team has made significant strides in its production of the Neighbourhood Plan. However, we consider that a number of changes are needed to ensure that the plan meets the basic conditions. In particular, we are concerned that the plan does not provide sufficient housing and employment land to meet the Local Plan requirement, and that the prioritisation</p>	1. Introduction	1 <i>(page numbers from original)</i>	2. The Basic Conditions	1	3. National Planning Policy and Guidance	2	4. The Development Plan	10	5. Response to draft plan	13	6. Conclusion	23	7. Appendices	23	<p>Noted</p> <p>Recognition of the work that has been accomplished is appreciated though disagree with some of the issues raised, these are detailed as</p>	<p>None needed</p> <p>None needed</p>
1. Introduction	1 <i>(page numbers from original)</i>																
2. The Basic Conditions	1																
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	<p>of previously developed land is inconsistent with national planning policy. We are promoting the land at Widham Farm for a sustainable extension to the north of Purton, which could make a valuable contribution to the supply of housing and employment land.</p> <p>1.3 Our detailed representations are set out below, under the following key headings:</p> <ul style="list-style-type: none"> 2. The Basic Conditions 3. National Planning Policy and Guidance 4. The Development Plan 5. Response to the draft policies 6. Summary and conclusions 	appropriate below.	
	<p>2. The Basic Conditions</p> <p>2.1 The basic conditions are set out in paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990 as applied to neighbourhood plans by Section 38A of the Planning and Compulsory Purchase Act 2004. The basic conditions are:</p> <ul style="list-style-type: none"> a. having regard to national policies and advice contained in guidance issued by the Secretary of State it is appropriate to make the order (or neighbourhood plan). b. having special regard to the desirability of preserving any listed building or its setting or any features of special architectural or historic interest that it possesses, it is appropriate to make the order. This applies only to Orders. c. having special regard to the desirability of preserving or enhancing the character or appearance of any conservation area, it is appropriate to make 	Extract from TCPA 1990 noted for reference.	None needed.

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	<p>the order. This applies only to Orders.</p> <p>d. the making of the order (or neighbourhood plan) contributes to the achievement of sustainable development.</p> <p>e. the making of the order (or neighbourhood plan) is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area).</p> <p>f. the making of the order (or neighbourhood plan) does not breach, and is otherwise compatible with, EU obligations.</p> <p>g. prescribed conditions are met in relation to the Order (or plan) and prescribed matters have been complied with in connection with the proposal for the order (or neighbourhood plan).</p>		
	<p>3. National Planning Policy and Guidance</p> <p>National Planning Policy Framework (NPPF)</p> <p>3.1 The NPPF was adopted in March 2012. It sets out the Government's planning policies for England and how these are expected to be applied. The purpose of the planning system is to contribute to the achievement of sustainable development. The policies in paragraphs 18 to 219 of the NPPF, taken as a whole, constitute the Government's view of what sustainable development in England means in practice for the planning system.</p> <p>3.2 Paragraph 14 of the NPPF sets out the presumption in favour of sustainable development, which is the golden thread running through both plan-making and decision-taking. For plan-making this means that:</p> <ul style="list-style-type: none"> local planning authorities should positively seek opportunities to meet the development needs of their area; 	<p>Extract from NPPF 2012 noted for reference.</p>	<p>None needed.</p>

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	<ul style="list-style-type: none"> Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless: any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or specific policies in this Framework indicate development should be restricted. <p>3.3 Paragraph 16 states that the application of the presumption will have implications for how communities engage in neighbourhood planning. Critically, it will mean that neighbourhoods should:</p> <ul style="list-style-type: none"> develop plans that support the strategic development needs set out in Local Plans, including policies for housing and economic development; plan positively to support local development, shaping and directing development in their area that is outside the strategic elements of the Local Plan; and identify opportunities to use Neighbourhood Development Orders to enable developments that are consistent with their neighbourhood plan to proceed. <p>3.4 Paragraph 17 identifies that within the overarching roles that the planning system ought to play, a set of core land-use planning principles should underpin both plan-making and decision-taking. All of the principles set out (not repeated here for brevity are relevant to the neighbourhood plan must be considered.</p> <p>3.5 Paragraph 47 requires that to boost significantly the supply of housing, local planning authorities should:</p> <ul style="list-style-type: none"> use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the 		

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	<p>housing market area, as far as is consistent with the policies set out in this Framework, including identifying key sites which are critical to the delivery of the housing strategy over the plan period;</p> <ul style="list-style-type: none"> • identify and update annually a supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirements with an additional buffer of 5% (moved forward from later in the plan period) to ensure choice and competition in the market for land. Where there has been a record of persistent under delivery of housing, local planning authorities should increase the buffer to 20% (moved forward from later in the plan period) to provide a realistic prospect of achieving the planned supply and to ensure choice and competition in the market for land; • identify a supply of specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15; • for market and affordable housing, illustrate the expected rate of housing delivery through a housing trajectory for the plan period and set out a housing implementation strategy for the full range of housing describing how they will maintain delivery of a five-year supply of housing land to meet their housing target; and • set out their own approach to housing density to reflect local circumstances. <p>3.6 Paragraph 49 states that housing applications should be considered in the context of the presumption in favour of sustainable development. Relevant policies for the supply of housing should not be considered up-to-date if the local planning authority cannot demonstrate a five year supply of deliverable housing sites.</p> <p>3.7 Paragraph 156 requires local planning authorities to set out the strategic priorities for the area in the Local Plan. This should include strategic policies to</p>		

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	<p>deliver:</p> <ul style="list-style-type: none"> • the homes and jobs needed in the area; • the provision of retail, leisure and other commercial development; • the provision of infrastructure for transport, telecommunications, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat); • the provision of health, security, community and cultural infrastructure and other local facilities; and • climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment, including landscape. <p>3.8 Paragraph 159 states that local planning authorities should have a clear understanding of housing needs in their area. They should:</p> <ul style="list-style-type: none"> • prepare a Strategic Housing Market Assessment to assess their full housing needs, working with neighbouring authorities where housing market areas cross administrative boundaries. The Strategic Housing Market Assessment should identify the scale and mix of housing and the range of tenures that the local population is likely to need over the plan period which: • meets household and population projections, taking account of migration and demographic change; • addresses the need for all types of housing, including affordable housing and the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes); and • caters for housing demand and the scale of housing supply necessary to meet this demand; 		

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	<ul style="list-style-type: none"> prepare a Strategic Housing Land Availability Assessment to establish realistic assumptions about the availability, suitability and the likely economic viability of land to meet the identified need for housing over the plan period. <p>3.9 Paragraph 184 states that Neighbourhood plans must be in general conformity with the strategic policies of the Local Plan. <u>To facilitate this, local planning authorities should set out clearly their strategic policies for the area and ensure that an up-to-date Local Plan is in place as quickly as possible.</u> [our emphasis]</p> <p>3.10 Paragraph 198 sets out that where a Neighbourhood Development Order has been made, a planning application is not required for development that is within the terms of the order. Where a planning application conflicts with a neighbourhood plan that has been brought into force, planning permission should not normally be granted.</p>		
	<p>National Planning Practice Guidance (PPG)</p> <p>3.11 The PPG was launched in March 2014. It replaced a number of practice guidance documents that were deleted when the PPG was published.</p> <p>3.12 The Government’s guidance sets out the correct sequence of events in neighbourhood plan preparation set out at Paragraph: 080 Reference ID: 41-080-20140306 A summary of the key stages in neighbourhood planning which provides (so far as relevant) and subsequent PPG paragraphs:</p> <p><i>“Step 1: Designating neighbourhood area and if appropriate neighbourhood forum</i></p> <p><i>Step 2: Preparing a draft neighbourhood plan or Order</i></p>	<p>Extracts from the National Planning Practice Guidance 2014 noted for reference.</p> <p>Reference incorrect, it is 080 <i>Reference ID: 41-080-20170728.</i></p>	None needed.

	COMMENT	RESPONSE	NP MODIFICATION
	<p><i>Qualifying body develops proposals (advised or assisted by the local planning authority)</i></p> <ul style="list-style-type: none"> <i>gather baseline information and evidence</i> <i>engage and consult those living and working in the neighbourhood area and those with an interest in or affected by the proposals (e.g. service providers)</i> <i>talk to land owners and the development industry</i> <i>identify and assess options</i> <i>•determine whether European Directives might apply</i> <i>•start to prepare proposals documents e.g. basic conditions statement</i> <p><i>Step 3: Pre-submission publicity & consultation</i></p> <p><i>The qualifying body:</i></p> <ul style="list-style-type: none"> <i>•publicises the draft plan or Order and invites representations</i> <i>•consults the consultation bodies as appropriate</i> <i>•sends a copy of the draft plan or Order to the local planning authority</i> <i>•where European Obligations apply, complies with relevant publicity and consultation requirements</i> <i>•considers consultation responses and amends plan / Order if appropriate</i> <i>•prepares consultation statement and other proposal documents”</i> <p><i>Step 4: Submission of a neighbourhood plan or Order proposal to the local planning authority</i></p> <ul style="list-style-type: none"> <i>Qualifying body submits the plan or Order proposal to the local planning authority</i> <i>Local planning authority checks that submitted proposal complies with all relevant legislation</i> <i>If the local planning authority finds that the plan or order meets the legal requirements it:</i> 		

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	<ul style="list-style-type: none"> – publicises the proposal for minimum 6 weeks and invites representations – notifies consultation bodies referred to in the consultation statement – appoints an independent examiner (with the agreement of the qualifying body)..." <p>3.13 Paragraph: 001 Reference ID: 41-001-20140306 What is neighbourhood planning? provides (so far as relevant):</p> <p><i>"...Neighbourhood planning provides a powerful set of tools for local people to ensure that they get the right types of development for their community where the ambition of the neighbourhood is aligned with the strategic needs and priorities of the wider local area."</i></p> <p>3.14 Paragraph: 003 Reference ID: 41-003-20140306 What are the benefits to a community of developing a neighbourhood plan or Order? provides:</p> <p><i>"...Neighbourhood planning provides the opportunity for communities to set out a positive vision for how they want their community to develop over the next ten, fifteen, twenty years in ways that meet identified local need and make sense for local people. They can put in place planning policies that will help deliver that vision or grant planning permission for the development they want to see...."</i></p> <p>3.15 Paragraph: 004 Reference ID: 41-004-20140306 What should a Neighbourhood Plan address? provides:</p> <p><i>"...A neighbourhood plan should support the strategic development needs set out in the Local Plan and plan positively to support local development (as outlined in paragraph 16 of the National Planning Policy Framework."</i></p> <p>3.16 Paragraph: 007 Reference ID: 41-007-20140306 What weight can be</p>		

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	<p>attached to an emerging neighbourhood plan when determining planning applications? provides:</p> <p><i>“...The consultation statement submitted with the draft neighbourhood plan should reveal the quality and effectiveness of the consultation that has informed the plan proposals....”</i></p> <p>3.17 Paragraph: 009 Reference ID: 41-009-20140306 Can a Neighbourhood Plan come forward before an up-to-date Local Plan is in place? provides:</p> <p><i>“...Where a neighbourhood plan is brought forward before an up-to-date Local Plan is in place the qualifying body and the local planning authority should discuss and aim to agree the relationship between policies in:</i></p> <ul style="list-style-type: none"> <i>• the emerging neighbourhood plan</i> <i>• the emerging Local Plan</i> <i>• the adopted development plan</i> <i>• with appropriate regard to national policy and guidance.</i> <p><i>The local planning authority should take a proactive and positive approach, working collaboratively with a qualifying body particularly sharing evidence and seeking to resolve any issues to ensure the draft neighbourhood plan has the greatest chance of success at independent examination. The local planning authority should work with the qualifying body to produce complementary neighbourhood and Local Plans....”</i></p> <p>3.18 Paragraph: 040 Reference ID: 41-040-20140306 What evidence is needed to support a neighbourhood plan or Order? provides:</p> <p><i>“While there are prescribed documents that must be submitted with a neighbourhood plan or Order there is no ‘tick box’ list of evidence required for neighbourhood planning. Proportionate, robust evidence should support the choices made and the approach taken. The evidence should be drawn</i></p>		

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	<p><i>upon to explain succinctly the intention and rationale of the policies in the draft neighbourhood plan or the proposals in an Order.</i></p> <p><i>A local planning authority should share relevant evidence, including that gathered to support its own plan-making, with a qualifying body. Further details of the type of evidence supporting a Local Plan can be found here Local Plan.”</i></p> <p>3.19 Paragraph: 041 Reference ID: 41-041-20140306 How should the policies in a neighbourhood plan be drafted? provides:</p> <p><i>“A policy in a neighbourhood plan should be clear and unambiguous. It should be drafted with sufficient clarity that a decision maker can apply it consistently and with confidence when determining planning applications. It should be concise, precise and supported by appropriate evidence. It should be distinct to reflect and respond to the unique characteristics and planning context of the specific neighbourhood area for which it has been prepared.”</i></p> <p>3.20 Paragraph: 042 Reference ID: 41-042-20140306 Can a neighbourhood plan allocate sites for development? provides:</p> <p><i>“A neighbourhood plan can allocate sites for development. A qualifying body should carry out an appraisal of options and an assessment of individual sites against clearly identified criteria. Guidance on assessing sites and on viability can be found here and here.” [These link to PPG, Housing and economic land availability assessment and Viability]</i></p> <p>3.21 Paragraph: 043 Reference ID: 41-043-20140306 What if a local planning authority is also intending to allocate sites in the same neighbourhood area? provides:</p>		

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	<p><i>“If a local planning authority is also intending to allocate sites in the same neighbourhood area the local planning authority should avoid duplicating planning processes that will apply to the neighbourhood area. It should work constructively with a qualifying body to enable a neighbourhood plan to make timely progress. A local planning authority should share evidence with those preparing the neighbourhood plan, in order for example, that every effort can be made to meet identified local need through the neighbourhood planning process.”</i></p> <p>3.22 Paragraph: 047 Reference ID: 41-047-20140306 What is the role of the wider community in neighbourhood planning? provides:</p> <p><i>“A qualifying body should be inclusive and open in the preparation of its neighbourhood plan or Order and ensure that the wider community:</i></p> <ul style="list-style-type: none"> <i>• is kept fully informed of what is being proposed</i> <i>• is able to make their views known throughout the process</i> <i>• has opportunities to be actively involved in shaping the emerging neighbourhood plan or Order</i> <i>• is made aware of how their views have informed the draft neighbourhood plan or Order.”</i> <p>3.23 Paragraph: 048 Reference ID: 41-048-20140306 Should other public bodies, landowners and the development industry be involved in preparing a draft neighbourhood plan or Order? provides:</p> <p><i>“A qualifying body must consult any of the consultation bodies whose interest it considers may be affected by the draft neighbourhood plan or Order proposal. The consultation bodies are set out in Schedule 1 to the Neighbourhood Planning (General) Regulations 2012 (as amended). Other public bodies, landowners and the development industry should be involved in preparing a draft neighbourhood plan or Order. By doing this qualifying</i></p> 		

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	<p><i>bodies will be better placed to produce plans that provide for sustainable development which benefits the local community whilst avoiding placing unrealistic pressures on the cost and deliverability of that development.”</i></p> <p>3.24 Paragraph: 051 Reference ID: 41-051-20140306 Is additional publicity or consultation required where European directives might apply? provides:</p> <p><i>“European directives, incorporated into UK law, may apply to a draft neighbourhood plan or Order. Where they do apply a qualifying body must make sure that it also complies with any specific publicity and consultation requirements set out in the relevant legislation. The local planning authority should provide advice on this.</i></p> <p><i>The legislation that may be of particular relevance to neighbourhood planning is:</i></p> <ul style="list-style-type: none"> • <i>the Environmental Assessment of Plans and Programmes Regulations 2004 (as amended)</i> • <i>the Conservation of Habitats and Species Regulations 2010 (as amended)</i> • <i>the Town and Country Planning (Environmental Impact Assessment) Regulations 2011 (as amended)</i> <p><i>It may be appropriate, and in some cases a requirement, that the statutory environmental bodies English Heritage, the Environment Agency and Natural England be consulted.”</i></p> <p>3.25 Paragraph: 053 Reference ID: 41-053-20140306 Does the local planning authority consider whether a neighbourhood plan or Order meets the basic conditions when a neighbourhood plan or Order is submitted to it? provides:</p> <p><i>“...The local planning authority should provide constructive comments on an emerging plan or Order before it is submitted.”</i></p>		

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	<p>3.26 Paragraph: 066 Reference ID: 41-066-20140306 When should a qualifying body consider the basic conditions that a neighbourhood plan or Order needs to meet? provides:</p> <p><i>“Throughout the process of developing a neighbourhood plan or Order a qualifying body should consider how it will demonstrate that its neighbourhood plan or Order will meet the basic conditions that must be met if the plan or order is to be successful at independent examination. The basic conditions statement is likely to be the main way that a qualifying body can seek to demonstrate to the independent examiner that its draft neighbourhood plan or Order meets the basic conditions. A qualifying body is advised to discuss and share early drafts of its basic conditions statement with the local planning authority.”</i></p> <p>3.27 Paragraph: 067 Reference ID: 41-067-20140306 What should a local planning authority do to assist a qualifying body in considering the basic conditions? provides:</p> <p><i>“A local planning authority should provide constructive comments on the emerging neighbourhood plan or Order proposal prior to submission and discuss the contents of any supporting documents, including the basic conditions statement. If a local planning authority considers that a draft neighbourhood plan or Order may fall short of meeting one or more of the basic conditions they should discuss their concerns with the qualifying body in order that these can be considered before the draft neighbourhood plan or Order is formally submitted to the local planning authority.”</i></p>		
	<p>4. The Development Plan</p> <p>4.1 Neighbourhood Plans must be in general conformity with the strategic policies of the wider local area, which in this instance are set out within the</p>	The precise extracts from the Wiltshire Core Strategy noted for	None needed.

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	<p>Wiltshire Core Strategy.</p> <p>4.2 The Core Strategy was adopted in January 2015. It sets out strategic policies covering the whole district, including policies relating to the amount and distribution of housing development and accessibility criteria.</p> <p>4.3 The following policies are referenced in the Neighbourhood Plan:</p> <p>4.4 Policy CP1: Settlement Boundary - identifies the settlements where sustainable development will take place. It identifies Purton as a large village. Such settlements have a limited range of employment, services and facilities. Development in these villages will be limited to that needed to help meet housing needs of the settlement and to improve employment opportunities, services and facilities.</p> <p>4.5 Policy CP2: Delivery Strategy - states that development outside of settlement limits will only be permitted where identified through the Site Allocations Development Plan Document or a neighbourhood plan.</p> <p>4.6 Policy CP19: Royal Wootton Bassett and Cricklade Community Area - identifies a requirement for 1,455 homes to be built in the Community Area by 2026. Of these, 1,070 are identified for the town of Royal Wootton Bassett while the remaining 385 new homes should be provided in the rural parts of the community area.</p> <p>4.7 Policy CP34: Employment Land - states that outside the Principal Settlements, Market Towns and Local Service Centres, development will be supported that is required to adapt agricultural enterprises to modern agricultural</p>	<p>reference.</p> <p>It goes on to state that of the 385 house remaining for the community area only 113 remain to be identified. Latest Wiltshire Housing Land Supply Statement Update, March 2017 indicates that zero homes need to be identified in the Royal Wootton Bassett and Cricklade rural area.</p>	<p>None needed.</p>

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	<p>practices and diversification or for rural based businesses within or adjacent to Large and Small Villages. Proposals will need to be of a scale consistent with the surroundings and not impact on residential amenity. They should also be supported by evidence that they are needed, and have adequate infrastructure.</p> <p>4.8 Policy CP43: Affordable Housing - this policy identifies a need to deliver 13,000 affordable dwellings during the plan period (1,181 per annum). It splits Wiltshire into two affordable housing areas. Where affordable housing is in most need it requires the provision of at least 40% affordable housing on sites of five or more dwellings. Off-site provision will only be allowed in exceptional circumstances where it can be proven that on-site delivery is not possible.</p> <p>4.9 Policy CP45: Meeting Wiltshire's housing needs - seeks to ensure that housing types, tenures and sizes reflects the demonstrable need for the community. The Wiltshire SHMA identifies the housing needs of Wiltshire and variation to this will need to be justified through sound evidence from other credible sources.</p> <p>4.10 Policy CP48: Supporting Rural Life - sets out circumstances where new housing development would be allowed outside of the development limits to meet the employment needs of rural areas. These include accommodation for rural workers to live in the vicinity of their place of work in the interests of agriculture or forestry.</p> <p>4.11 Policy CP50: Biodiversity and geodiversity - requires development to protect nature conservation features or mitigate against their loss where this is not achievable. Development should seek opportunities to enhance biodiversity. Damage or disturbance to locally protected sites will generally be unacceptable, other than in exceptional circumstances.</p> <p>4.12 Policy CP51: Landscape - requires new development to protect, conserve</p>		

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	<p>and enhance landscape character. It states that development should be informed by a relevant Landscape Character Assessment. It also sets out a number of aspects of landscape character that development proposals must demonstrate have been conserved;</p> <p>4.13 Policy CP52: Green Infrastructure - requires development to make provision for the retention and enhancement of Wiltshire's Green Infrastructure Network. This includes making provision for accessible open space within new development;</p> <p>4.14 Policy CP57: Design - requires a high standard of design in all new developments. It requires applications for new development to demonstrate how the proposal would make a positive contribution to the character of Wiltshire.</p> <p>4.15 Policy CP58: Ensuring the Conservation of the Historic Environment - states that development should protect, conserve and where possible enhance the historic environment, including designated and non-designated assets which contribute to local character.</p> <p>4.16 Policy CP61: Transport and new development - new development should be located and designed to reduce the need to travel particularly by private car, and to encourage the use of sustainable transport alternatives. Contributions will be sought towards sustainable transport improvements, and travel plans will be required to encourage the use of sustainable transport alternatives and more sustainable freight movements.</p> <p>4.17 Policy CP64: Demand Management - measures will be promoted where appropriate to reduce reliance on the car and to encourage the use of sustainable transport alternatives. These will include parking management, including for new residential development; traffic management and influencing travel choices.</p> <p>4.18 Policy CP65: Movement of goods - sets out how the council will seek to achieve a sustainable freight distribution system which makes the most efficient</p>		

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	use of road, rail and water networks, including encouraging HGV) traffic to use those roads where a minimum of community and environmental impacts will occur.		
	<p>5. Response to draft plan</p> <p>5.1 It is clear that the Neighbourhood Plan Team has made significant strides in its production of the Neighbourhood Plan.</p> <p>5.2 Notwithstanding this we consider that a number of changes to specific policies are needed to ensure that the plan meets the basic conditions. We also consider that additional site allocations are needed in order to meet the requirements of the Wiltshire Core Strategy. We address each section in turn below.</p> <p>5.3 We note that the Neighbourhood Plan period is set to coincide with the plan period of the Wiltshire Core Strategy i.e. until 2026. We are however conscious this leaves only 9 years from now for the new plan to remain in force. Consideration should be given to a longer plan period.</p>	Revision of the Wiltshire Core Strategy for 2026 will undoubtedly require changes to be made to neighbourhood plans.	None needed.
	<p>Employment</p> <p>5.4 Purton Policy 1 seeks to enhance the prospects for local employment. It is proposed that land at Mope Lane (identified as part of Purton Brickworks) and Penn Farm Industrial Estate, are to provide opportunities for local employment.</p> <p>5.5 We welcome the objective of increasing employment in the area. We note that the only opportunities being provided for in the Policy are for those falling within Use Class B1. We consider that this is not in conformity with the Core Strategy Policy CP34 which refers to "rural based businesses" which could fall within any of the 'employment' use classes, B1/B2/B8.</p>	Mopes Lane (Purton Brick Works) is a saved allocation identified Core Policy 19 and Penn Farm is a small existing industrial site. Inclusion in the Plan is to retain the land and buildings in employment use at for employment and to protect these valuable employment locations from alternative development.	None needed.

	COMMENT	RESPONSE	NP MODIFICATION
	<p>5.6 We consider that the locations identified are also not ideal for the types of enterprises that are referenced in the draft Policy. Existing occupiers at Mope Lane include a waste transfer/recycling station and a specialist industrial coatings supplier. At Penn Farm there is a vehicle repair garage. B1 uses which include offices, research and development of products and processes, light industry are appropriate within a residential area and uses such as those listed within the policy in particular are likely to seek locations with a lower incidence of disturbance from neighbouring activities. A more appropriate site for these B1 uses can also be considered as part of the proposed development at Widham Farm and our client would be willing to work with the Parish Council to progress such an opportunity.</p> <p>5.7 The draft Policy also requires that access to the Penn Farm site should be taken from Mopes Lane. We would question the viability and therefore deliverability of the site with the requirement for a new access lane given that the developable area available is stated to amount to 0.13 Ha.</p> <p>5.8 We therefore consider that Purton Policy 1 fails to meet the basic conditions for Neighbourhood Plans, specifically with respect to conditions d and e.</p>	<p>Do not believe the remaining land on these sites would support use class B2/B8 and resulting traffic impact would be greater.</p> <p>Employment within Widham Farm site would increase traffic on residential roads.</p> <p>The new access makes the Penn Farm site more accessible and therefore functional and should accelerate deliverability rather than hinder.</p> <p>The Plan Policy 1 does contribute to sustainable development and does not conflict with the strategic policies in the Core Strategy.</p>	<p>None needed.</p> <p>None needed.</p> <p>None needed.</p>
	<p>Transport</p> <p>5.9 Paragraph 3.8, bullet point 3 refers to a pedestrian footpath being sought across the Swindon to Gloucester railway line. As you will be aware, our client's land has a significant frontage onto the railway line, as well as having boundaries to both the existing urban area at Witts Lane and Station Road. As a result, our client will be willing to look at the feasibility of helping to facilitate a pedestrian crossing providing links through the urban area or from Station Road across to the opposite site of the railway line to access the industrial sites at The Brickworks and</p>	<p>Previously the agent for the Widham Farm investigated unsuccessfully options with Network Rail for a pedestrian footpath over the railway. The Plan includes objective for a study to determine a location for a pedestrian footpath across the</p>	<p>None needed.</p>

	COMMENT	RESPONSE	NP MODIFICATION
	<p>Penn Farm.</p> <p>5.10 Purton Policy 3 requires new development to provide links to existing pedestrian routes where appropriate. Development at Widham Farm would include provision for footpaths which connect with the existing network, and also facilitate new links between existing routes.</p>	<p>railway.</p> <p>It is not clear what “facilitate” means in this regard. It is a relatively simple matter for a footpath to be aligned with the existing bridge subject to funding.</p> <p>The existing footpaths across Widham Farm are Public Rights of Way so if Widham were to be developed connecting footpaths would have to be connected.</p>	<p>None needed</p>
	<p>Environment</p> <p>5.11 Purton Policy 4 allocates an area identified on Map 5, as open space to be retained to protect locally important views to and from the escarpments to the north of the village. We note that the site at Widham Farm does not lie within the allocated area and support this status which is in line with the Inspector’s conclusions set out in her decision on Appeal reference APP/Y3940/A/11/2165449.</p> <p>5.12 However, we do note that the proposed designation of the key local landscape and the level of protection set out in Purton Policy 4 is not supported by a robust evidence base. The justification text for the policy references the Parish</p>	<p>Not relevant as Widham Farm is not within the area shown.</p> <p>The allocated area on Map 5 is a contiguous whole but the Plan would certainly benefit from the inclusion of an undeveloped Widham Farm as a contribution to that. Widham Farm could be designated as open space and not be developed.</p> <p>The protection of this key landscape is seen as important to villages and was included in the consultation of</p>	<p>None needed.</p> <p>None needed.</p>

	COMMENT	RESPONSE	NP MODIFICATION
	<p>Plan as the source for identifying the locally important views. It does not appear that any specific Landscape Assessment has taken place. Whilst the supporting text states that “Purton Parish Plan identified the need to protect these magnificent views and reduce the impact of development on the visually-sensitive skyline at the top of the village” this is not an informed assessment, nor necessarily representative of the total population.</p> <p>5.13 Without the evidence base required, the policy approach to creating a new landscape designation does not have regard to the Framework, in particular, paragraph 113 which requires distinction between the hierarchy of designated landscape areas, so that protection is commensurate with their status.</p> <p>5.14 We therefore consider that Purton Policy 4 fails to meet the basic conditions for Neighbourhood Plans, specifically with respect to condition a.</p> <p>5.15 Purton Policy 5 aims to retain land between the eastern boundary of Purton and the western edge of Swindon as open countryside to retain the rural quality and value of Purton, Purton Stoke, The Fox and Hayes Knoll. We note that the site at Widham Farm does not lie within the area described in the policy and development would not therefore result in any detrimental impact on the rural character or identity of the settlements.</p> <p>5.16 Purton Policy 6 refers to land adjoining the Swindon to Gloucester railway line as being prone to flooding. Proposals for development on this land are required by the draft policy to demonstrate how mitigation will prevent flooding of this land. The policy references a flood area shown on Map 6 and states that part of Widham Farm is included in this area prone to flooding. The proposals for development at Widham Farm exclude the area identified by the red arrow on Map 6 and determination of the earlier application concluded that flood risk was not a constraint to the proposed development.</p>	<p>the Parish Plan and this Plan.</p> <p>It does not conflict with Core Policy 51 Landscapes with not to “<i>Visually sensitive skylines, soils, geological and topographical features</i>”.</p> <p>It is not appropriate to assess Plan policies through a specific lens of Widham Farm.</p> <p>The area of Widham Farm is known frequently for surface water flooding. Though the last application for this site did not encroach into this area on the west and south of the site, the application in 2008 did. Whether or not flood risk is a constraint to a specific Widham Farm proposal</p>	<p>None needed.</p> <p>None needed.</p>

	COMMENT	RESPONSE	NP MODIFICATION
		would be subject to a planning determination. Widham Farm has been refused at Appeal three times.	
	<p>Facilities</p> <p>5.17 Paragraphs 3.12 to 3.13 set out the goals, as well as aims and objectives for facilities in the village. Again, we note the 4 aims which include protecting and where possible, enhancing facilities for elderly people who wish to remain in the village. We therefore take note of Purton Policy 8 with regard to facilities for the elderly and land being identified for the provision of supported living accommodation for elderly people. Again, Widham Farm provides the council with an opportunity for an early delivery of dwellings to meet this specific need.</p>	Conjecture as none of the previous three proposals for the site included accommodation for the elderly.	None needed.
	<p>Housing</p> <p>5.18 We note that the need for new homes is set out in the accompanying document 'Purton - Planning for the Future' and is based on a simple projection of past trends in population change The Plan proposes that 'about' 94 new homes will be needed between 2017 and 2026. We note that in 'Purton- Planning for the Future, there is an acknowledgement (paragraph 17) that this should be a minimum figure. We consider that to reflect the Core Strategy the Neighbourhood Plan should also express the requirement as a minimum figure.</p> <p>5.19 However there are other components of housing need that should be assessed such as homes needed to retain the younger population, homes which will contribute to providing a closer spatial relationship between homes and jobs and the need for affordable housing (through an updated affordable homes assessment) or the impact of Swindon not being able to meet its need. In adopting a housing requirement derived solely from a trend based, net change in population the Plan fails to comply with the approach for establishing the housing</p>	<p>Noted and agreed.</p> <p>Note: <i>"Establishing future need for housing is not an exact science. No single approach will provide a definitive answer. Plan makers should avoid expending significant resources on primary research (information that is collected</i></p>	<p>Amend reference in 3.15 pages 30 and 31 of the Plan from 'about' to 'minimum' number.</p> <p>None needed.</p>

	COMMENT	RESPONSE	NP MODIFICATION
	<p>requirement set out in the current PPG as it fails to move beyond the 'starting point' for assessing the housing requirement.</p>	<p><i>through surveys, focus groups or interviews etc and analysed to produce a new set of findings) as this will in many cases be a disproportionate way of establishing an evidence base. They should instead look to rely predominantly on secondary data (e.g. Census, national surveys) to inform their assessment which are identified within the guidance."</i> PPG Paragraph: 014 Reference ID: 2a-014-20140306</p> <p>Core Policy 1 states: "<i>Development at Large and Small Villages will be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities</i>", i.e. not the needs of the larger urban area of Swindon but of local needs.</p>	
	<p>5.20 The White Paper "Fixing our broken housing market", published in February 2017 indicated that the Government intends to adopt a standardised approach to assessing housing requirements. It stated that "a more standardised approach would provide a more transparent and more consistent basis for plan production, one which is more realistic about the current and future housing pressures in each place This would include <u>the importance of taking account of the needs of</u></p>	<p>Agreed a more standardised approach to assessing housing as requirements as indicated in "Fixing our broken housing market 2017" (the Housing White Paper) would provide more transparency</p>	<p>None needed.</p>

	COMMENT	RESPONSE	NP MODIFICATION
	<p><u>different groups, for example older people</u> “(our emphasis).</p> <p>5.21 Whilst the detail of the proposals for the standard assessment for housing need remain to be confirmed, the approach is expected to reflect the recommendations of the Local Plans Expert Group as follows 1:</p> <p>“The assessment of need includes any adjustment to address affordable housing need, and an allowance for housing that is necessary in addition to an estimate based on demographic projections, to respond to market signals in order to cater for demand and improve affordability. The FOAHN is not constrained to the total level of household growth estimated in the latest official projections at national or HMAS level. The total number of homes needed in an area can be greater than the number that might be assumed based solely on estimates of population change.”</p>	<p>The extract taken from the initial paragraph of Appendix 6 of the March 2016 Local Plans Expert Group is noted but the white paper has as yet to be incorporated into planning.</p>	<p>None needed.</p>
	<p>5.22 The assessment should also take account of local vacancy rates and/or second home ownership. Market signals include data on house price affordability and rental affordability. The Neighbourhood Plan references that a need for affordable housing, houses for first time buyers, smaller properties for those who wish to downsize and also properties suitable for older persons, including bungalows. It states that this need is identified in the Parish Plan (2014) and the Housing Needs survey from January 2012.</p> <p>5.23 The Parish Plan states (page 45) that 34% of residents identified such a need for affordable housing and low cost housing for first time buyers. The Housing Needs survey identified that just over 12% of the parish’s housing stock was ‘affordable housing’ much lower than Wiltshire’s average of 19.2%. In order to address the need for affordable housing, there is a strong case for providing for some more market housing in the village, which would enable delivery of more affordable housing alongside it. The Wiltshire Core Strategy Policy 43 identifies 2 zones across the plan area for the provision of affordable housing. Purton falls within the zone where 40% of new housing development over 5 units would need</p>	<p>Noted but the trigger for affordable housing is now 10 units not 5.</p> <p>It is recognised the level of affordable housing in Purton is lower than across Wiltshire, hence the reason for a site outside the settlement for affordable housing and low cost housing for first time</p>	<p>None needed.</p> <p>None needed.</p>

	COMMENT	RESPONSE	NP MODIFICATION
	<p>to be 'affordable housing'. Even if all of the provision identified in the draft Plan was to be within the site size threshold this would yield some 38 affordable units. Based on a total number of households currently (Parish Plan) of 1,701 and 12% being affordable housing this would represent an increase in the level of affordable housing to some 13.3% (of a total of 1,795 households), still much lower than the Wiltshire average. This suggests that there is a case for an increase in the housing requirement to assist in bringing forward more affordable housing.</p> <p>5.24 As the council will be aware, it is critical that the Neighbourhood Plan is in general conformity with the strategic policies in the Wiltshire Core Strategy. However, it is also the case that Neighbourhood Plans are seen by the Government as a means of providing a significant boost to housing land supply across the country.</p> <p>5.25 The stated aim/objective of ensuring that brownfield sites well related to the villages are prioritised over green field development is inconsistent with the Framework, which seeks to 'encourage' rather than 'prioritise' the development of previously developed land. The issue has arisen in numerous Local Plan examinations, but is probably best summarised in the Secretary of State appeal decision for Burgess Farm, Salford, which was issued shortly following the publication of the Framework (appeal ref: APP/U4230/A/11/2157433). Paragraph 14 of the decision letter clarifies the Secretary of State's position:</p> <p><i>"He gives less weight to the sequential approach to release of sites. National planning policy in the Framework encourages the use of previously developed land, but does not promote a sequential approach to land use. It stresses the importance of achieving sustainable development to meet</i></p>	<p>buyers. Ideally affordable housing is best located in larger centres with more support, infrastructure and importantly public transport. As villages do not have the same level of infrastructure and public transport, intrinsically it results in higher car usage. Purton is 70% car travel to work compared to 57% for England as a whole (2011 census).</p> <p>The Plan conforms to the policies in the Core Strategy.</p> <p>The white paper "Fixing our broken housing market" places greater weight than the NPPF by saying "amend the National Planning Policy Framework to indicate that great weight should be attached to the value of using suitable brownfield land within settlements for homes".</p>	<p>None needed.</p> <p>None needed.</p>

	COMMENT	RESPONSE	NP MODIFICATION
	<p><i>identified needs.”</i></p> <p>5.26 Clearly sites need to be viable and of a sufficient scale to address the identified needs for market and affordable housing.</p> <p>5.27 There are a number of aims and objectives set out in the plan with respect to Housing, with the goals being to provide existing and future residents with the opportunity to live in a decent home that meets their need and to retain the rural and historic character of the villages. We have considered each of the aims and objectives.</p> <p>5.28 We would question the merit in setting a maximum size for all developments to be smaller than 40 dwellings. Clearly if there are opportunities for sustainable developments for a greater number of dwellings, which can provide significant benefits for the local community, then these should be considered, particularly where they would be a logical extension to the village. We consider that this is the case with respect to the site at Widham Farm, which would address many of the issues raised with respect to the provision of housing.</p>	<p>Noted.</p> <p>In the consultation for Purton rural housing needs and the Parish Plan, residents identified they would support developments provided they were in proportion to the village (i.e. 40 houses or less per site).</p> <p>However having a larger site may provide more affordable houses but it places great strain on the overall infrastructure of a village as seen with the Ridgeway Farm development where even though the site has yet to be fully developed, the education provision is already under-performing because insufficient land was given over to a potential school, it lacks facilities and it is already promoting</p>	<p>None needed.</p> <p>None needed.</p>

	COMMENT	RESPONSE	NP MODIFICATION
		excessive car use.	
	<p>5.29 The site at Widham Farm has been the subject of planning applications and an appeal decision. It is clear that the only issue with the appeal was the issue of a five-year land supply. There were no environmental or technical issues with regard to the site which were used to refuse planning permission. With respect to flooding, the Inspector concluded at paragraph 124 of her decision:</p> <p>“These outcomes and maintenance of the proposed drainage system could be ensured by imposing conditions tying the permission to the Flood Risk Assessment and setting out requirements for drainage, floor levels, landscaping and the surface water management pond.³¹ The development would not reduce the risk of flooding so as to provide a benefit which would tip the balance in favour of a grant of permission. However, it would not add to the local flood risk so that the appeal could be dismissed on this ground”</p> <p>5.30 With respect to highways and traffic, she found (paragraph 126):</p> <p>“Nevertheless, I agree with the appellant and the Council that the roads in Purton are not used to capacity and could accommodate cumulative traffic from the proposed and nearby housing. The development would be unlikely to cause unacceptable traffic problems or loss of highway safety.”</p> <p>5.31 With respect to environment, heritage and design the findings were:</p> <p>“The proposed development would be laid out to retain sufficient space around Widham Grove and Widham Farmhouse so as to preserve the setting of both listed buildings. Subject to provision of the ecological pond and suitable vegetation, the proposed housing would cause no unacceptable harm to any protected species. Whether the development would have an acceptable design and impact on nearby properties would be properly considered at reserved matters stage.”</p>	<p>The Neighbourhood Plan is about building communities and satisfying local need, rather than just building houses.</p> <p>It should be noted that Widham Farm has failed on three separate occasions (2009, 2012 and 2013) because the site is outside the Settlement Boundary and <u>not because of an issue with five-year land supply as suggested in 5.29.</u></p> <p>(a) Appeal: APP/Y3940/A/11/2165449 August 2012</p> <p>Conclusion: 81. <i>This proposal would conflict with the extant Local Plan as it would represent development outside of an identified settlement framework boundary. I have found the development plan to be in accordance with the Framework and that the Council in this case has demonstrated a 5-year housing supply for this location. I do not consider that the weight afforded to the benefits of the scheme particularly in terms of affordable</i></p>	<p>None needed.</p> <p>None needed.</p>

	COMMENT	RESPONSE	NP MODIFICATION
		<p><i>housing, nor my overall conclusions on prematurity and the other matters, serve to outweigh this conflict.</i></p> <p><i>82. For the reasons given above and having regard to</i></p> <p><i>(b) Judicial Review March 2013 before The Honourable Mr Justice Stuart-Smith.</i></p> <p><i>Conclusion on the 5-Year Housing Supply.</i></p> <p><i>55. In such circumstances I consider that there is sufficient evidence to support that, for this location, a 5-year housing supply has been shown.</i></p> <p><i>58. My reading of the previous appeal decision on this site suggests that the boundaries were considered in both the preparation and Examination of the Local Plan in 2006, and while they do not appear to have been assessed against the significant increase in supply sought by the dRSS, they have been against the large increase currently promoted in the eWCS. This process has not led to a redrawing of the</i></p>	

	COMMENT	RESPONSE	NP MODIFICATION
		<p><i>boundaries, consequently I do not consider that Policy H4, which they inform, is out of date or fails to conform with the Framework.</i></p> <p><i>(c) Appeal: APP/Y3940/A/11/2165449 Sept 2013.</i></p> <p><i>Conclusion: 129. Notwithstanding my findings on precedent, I consider that the conflict between the proposed development and LP Policy H4 is a compelling consideration. This policy is consistent with the Framework and not out of date in relation to the appeal site. The proposed housing would result in a pattern of development that fails to protect the intrinsic character of the countryside or support the vitality of the rural community; it would not accord with the Framework. The development plan is not absent, silent or out of date – and the adverse impacts of the scheme would outweigh the benefits. For the reasons given above and with regard to all other matters raised, I conclude that the appeal should be dismissed.</i></p>	

	COMMENT	RESPONSE	NP MODIFICATION
	<p>5.32 Therefore we welcome acknowledgement through the Neighbourhood Plan that there is a need for sites to come forward within and adjoining the village. Widham Farm should now be considered as a site for housing.</p>	<p>The Plan considered Widham Farm and assessed it on many sustainability criteria but there are other sites which performed significantly better in the assessment than Widham Farm in meeting the needs of the village.</p>	<p>None needed.</p>
	<p>Purton Policy 12: Development Principles</p> <p>5.33 The Policy identifies sites to deliver ‘approximately’ 75 homes in Purton. To fully reflect the Core Strategy, the policy should be expressed as a net figure, and also as a minimum.</p> <p>5.34 The proposed approach to delivering housing within the settlement boundaries is also inconsistent with the Framework’s requirement to maintain a 5 year supply of housing land. There is no mechanism identified to monitor the delivery of housing, no trajectory assumed for delivery, and therefore no provision for addressing any shortfall in delivery that occurs. The policy seeks to prevent the release of greenfield sites before sites within the settlement boundary are brought forward. However such an approach is counter-intuitive, as if sites identified within the supply by Policy 12 have failed to commence then additional sites will need to come forward to address the shortfall but would be prevented from doing so by this draft policy.</p> <p>5.35 Purton Policy 12 also identifies a number of sites within the settlement</p>	<p>The Plan identifies the need for a total of 94 houses provided from those sites within the settlement boundary and the single site outside the settlement boundary.</p> <p>Monitoring would be through Wiltshire’s Annual Monitoring Report</p> <p>Agreed policy requires housing within the settlement boundary to be brought forward before land outside the settlement boundary may be counter-productive and prevent development taking outside the settlement boundary if not all the sites are developed.</p> <p>The Plan recognises the issue of</p>	<p>Revise wording in Policy 12 to remove this restriction.</p> <p>None needed.</p>

	COMMENT	RESPONSE	NP MODIFICATION
	<p>boundary for development for housing (shown on Map 11). The deliverability of these sites is important, but it is also crucial that developments deliver what the village needs with regard to size and types of homes, affordable homes for the elderly and lifetime homes. We question the delivery of a number of these sites, many of which have been available for some time and have not been progressed which raises doubts as to their viability. A number will also impact on the heritage assets of the village. They are also not of a scale which can deliver the aims and objectives of the plan, for example, in terms of achieving an appropriate housing mix.</p> <p>5.36 We therefore object to the policy as drafted as it fails to meet the basic conditions for Neighbourhood Plans, specifically conditions a, d and e.</p>	<p>developers providing the type and mix of housing require using infill alone hence one of the reasons for identifying a site outside the settlement boundary.</p> <p>The impact on heritage assets are identified in Policy 12 with details of assets likely affected in “Purton ~ Planning for the Future”.</p> <p>The Plan does not conflict with National or local strategies.</p>	<p>None needed.</p> <p>None needed.</p>
	<p>Purton Policy 13 Development outside the Settlement Boundary</p> <p>5.37 Purton Policy 13 (Development outside Settlement Boundary) applies to land identified on Map 12 as an area of search for the provision of up to 40 smaller homes, including affordable housing, houses for first time buyers, smaller properties for those who wish to downsize and also properties suited to older persons, including bungalows. The policy sets out a number of constraints with regard to this site including the impact on historic assets (Ringsbury Camp Scheduled Monument and the Grade II* Restrop House). We note that there is a current application on part of this site and that the Parish Council and Neighbourhood Planning Group have objected to it. One of the stated concerns is that the applicant has not engaged with the Neighbourhood Plan Group and that the application does not conform to the emerging neighbourhood plan.</p> <p>5.38 The site has been identified as the most appropriate to accommodate further housing development for the village as the result of a site assessment</p>	<p>The application was the wrong development for that location and did not align with the objectives of the Plan.</p> <p>It claimed these were small dwellings but all 41 dwellings proposed stipulated that one of the bedrooms was a study when clearly it was not. Thus it potentially understated occupancy levels, the number of garages (as required in LPT3) and the level of traffic movements to the main road</p>	<p>None needed.</p>


	COMMENT	RESPONSE	NP MODIFICATION
	<p>exercise using scores against various ranked criteria.</p> <p>5.39 In our view the correct approach to development outside the settlement boundary is to apply the presumption in favour of sustainable development set out within the Framework; i.e. planning permission should be granted unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole.</p>	<p>estimated in their travel plan.</p> <p>The gardens were small, some less than the footprint of the house. Gardens are essential to provide safe places for children to play especially when the proposed development adjoins a busy main road.</p> <p>It cut off the land behind the site from future development and prevented the potential to provide a road to the rear of the school in future should it be required.</p> <p>Lastly the application stated “<i>it reflects the need and aspirations of the local community</i>” but did not provide evidence to support this assertion. It also cited the support of the Neighbourhood Plan though it took no notice of the criteria in the Plan. The first draft of the Plan was only published a couple of weeks prior to the Application.</p>	
	<p>5.40 In our view, numerical ranking exercises, which are not based upon specific schemes or mitigation, are not an adequate replacement for the traditional planning balance exercise. If there is a shortfall in housing land supply, applications need to be considered on their own merits, having regard to their</p>	<p>This is an attempt to confuse two issues. If there is not a 5 year land supply then other sustainable developments outside the</p>	<p>None needed.</p>

	COMMENT	RESPONSE	NP MODIFICATION
	<p>compliance with the development plan and any other material considerations. The site assessments may be a material consideration, but the policy should not exclude other sustainable developments being brought forward to address an acknowledged need.</p> <p>5.41 We note in particular the assessment of Widham Farm on pages 48 and 49 of the report titled (Purton - Planning for the Future). The site is assessed against 21 criteria and given a rating against each. As set out earlier, the site has previously been assessed against many of these criteria and in each case they were not found to be a constraint on development. The scoring of the site on page 48 is not correct and underplays the positive contribution that development of this site would make to Purton. We discuss the over-reliance on distances to individual facilities further below. However, the scoring for potential added value, impact on heritage, landscape (view) impact, and flooding should all be increased to the maximum score as all of the negative aspects identified in the commentary to support the lower scoring will be avoided, mitigated or improved as a result of the proposed development layout.</p> <p>5.42 Of the 21 criteria listed, 15 relate to the distance of a site from a named facility which we consider places a disproportionate emphasis on locational aspects of sustainability, contrary to the approach adopted more widely when considering development which can support rural settlements and communities. The</p>	<p>settlement boundary can be put forward.</p> <p>Where there is a demonstrable 5 year land supply (as Wiltshire Council has) then there needs to be a means to consider the best locations to meet local needs. Refer back to 5.20 above and the White Paper "Fixing our broken housing market", which indicated a need for standardised approach to assessing housing requirements.</p> <p>Interesting. Wainhomes' letter of February 2017 in response to the Informal Consultation at the beginning of this year raised all these matters (with the exception of the vets), especially in regard to the Assessment of Distances and to the distances shown in the "GPJF Table 3.6 - Suggested Acceptable Walking Distance".</p> <p>All the points raised at that were addressed in the update of Purton ~ Planning for the Future ready for the Regulation 14 Consultation. The distances from named sites to the respective facilities were added to</p>	

	COMMENT	RESPONSE	NP MODIFICATION																
	<p>application of the three strands to sustainability (economic, social and environmental) seeks to ensure that a broad assessment is made. One of the Core planning principles set out in the NPPF is to focus significant development in locations which are or can be made sustainable (our emphasis). Paragraph 55 recognises that development in one village may even support services in a separate village.</p> <p>5.43 More specifically, some of these criteria are of limited relevance to many residents (access to a vet) and some in effect duplicate the same measure (e.g. distance to Village Hall and Library, distance to alternative public houses) which, despite the weighting which we acknowledge is used to balance some of the other criteria, again over states the importance of distance to a facility in determining sustainability (or resilience) of the sites being considered.</p> <p>5.44 In addition we also question the use of the distances to assess accessibility. The Institution of Highways and Transportation document “Guidelines for Providing for Journeys on Foot” contains suggested acceptable walking distances for pedestrians for some common facilities. This document is intended to advise on planning for and providing for pedestrians, maintaining pedestrian infrastructure and promoting walking and as a result the distances stated in the document may be used for planning and evaluation purposes. Table 3.6 from Guidelines for Providing for Journeys on Foot (GPJF) is reproduced below:</p> <p>GPJF Table 3.6 - Suggested Acceptable Walking Distance</p> <table border="1" data-bbox="199 1118 1279 1361"> <tr> <th></th><th>Town Centres (m)</th><th>Commuting/School / Sight- seeing (m)</th><th>Elsewhere (m)</th></tr> <tr> <td>Desirable</td><td>200</td><td>500</td><td>400</td></tr> <tr> <td>Acceptable</td><td>400</td><td>1000</td><td>800</td></tr> <tr> <td>Preferred maximum</td><td>800</td><td>2000</td><td>1200</td></tr> </table>		Town Centres (m)	Commuting/School / Sight- seeing (m)	Elsewhere (m)	Desirable	200	500	400	Acceptable	400	1000	800	Preferred maximum	800	2000	1200	<p>the analysis of all of the sites and the respective distance were brought into line with the CHIT GPJF see page 28 of Purton ~ Planning for the Future.</p> <p>As noted in the response to Turley below, of the criteria, Within Settlement Boundary and Potential Added value to be removed, Impact on View to be changed to Impact on sensitive skyline or view.</p> <p>As to access to a vet, Purton is a rural village and a large number of the residents keep pets, particularly dogs as there is good countryside for walking (and good healthy exercise)</p>	<p>None needed as the points as raised have already been implemented following Wainhomes comments on the Informal Consultation.</p>
	Town Centres (m)	Commuting/School / Sight- seeing (m)	Elsewhere (m)																
Desirable	200	500	400																
Acceptable	400	1000	800																
Preferred maximum	800	2000	1200																

	COMMENT	RESPONSE	NP MODIFICATION
	<p>5.45 Section 4 of Manual for Streets also describes the characteristics of a walkable neighbourhood as follows:</p> <p>5.46 “Walkable neighbourhoods are typically characterised by having a range of facilities within 10 minutes’ (up to about 800 m) walking distance of residential areas which residents may access comfortably on foot. However, this is not an upper limit and PPS13 states that walking offers the greatest potential to replace short car trips, particularly those under 2 km. MfS encourages a reduction in the need to travel by car through the creation of mixed-use neighbourhoods with interconnected street patterns, where daily needs are within walking distance of most residents.”</p> <p>5.47 Therefore the assessment should reflect the above criteria to assess accessibility.</p> <p>5.48 The inspector for the appeal against refusal of the application at Widham Farm stated that “the site is within walking or cycling distance of amenities in the settlement, including a primary and a secondary school, a library, convenience store and new post office”. Indeed, at the 2012 inquiry the Council conceded that “there is no land available for development within Purton which is more sustainable than the appeal site”. Therefore the site is accessible and sustainable.</p> <p>5.49 We suggest that the appraisal scoring criteria be recast and sites reassessed to reflect these guidelines.</p> <p>5.50 We therefore object to the policy as drafted as it fails to meet the basic conditions for Neighbourhood Plans, specifically conditions a, d and e.</p>	<p>The Plan does not conflict with National or local strategies.</p>	<p>None needed.</p>
	<p>6. Conclusion</p> <p>6.1 We note that work has been undertaken to get the Neighbourhood Plan to</p>	<p>The objection is noted but Widham</p>	

	COMMENT	RESPONSE	NP MODIFICATION
	<p>the current stage. We also note that there are a number of specific aims and objectives that our clients land could deliver going forward, these being:-</p> <ul style="list-style-type: none"> • meeting homes with local need, including affordable homes and the elderly; • the provision of employment land for B1 use; and, • the potential for a pedestrian link between Purton and the northern side of the railway line. <p>6.2 Therefore, we object to the failure to allocate the site at Widham Farm for development in the Draft Neighbourhood Plan.</p>	<p>Farm as a sustainable site is assessed to underperform compared to other sites outside the settlement boundary around Purton.</p>	

	COMMENT	RESPONSE	NP MODIFICATION
	<p>7. Appendices</p> <p>APPENDIX EP1</p> <p>Land at Widham Farm, Purton, Wiltshire</p> 		

	COMMENT	RESPONSE	NP MODIFICATION
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Turley on behalf of Hills Homes (site 436 Land at Pavenhill)

	<p>1. Introduction</p> <p>Background</p> <p>1.1 This response to the draft Purton Neighbourhood Plan is submitted by Turley on behalf of Hills Homes Developments Ltd.</p> <p>1.2 Our client controls land located at Pavenhill, which was the subject to a recent planning application Ref. 16/03625/FUL, which was refused permission by Wiltshire Council on 16 November 2016. The application sought permission for the erection of 25 dwellings, with associated landscaping, access arrangements and the provision of public open space.</p> <p>1.3 Wiltshire Council's decision is currently the subject of a planning appeal (PINS Ref. APP/Y3940/W/17/3166533). An Appeal Hearing is scheduled to take place on 22 August 2017 and is programmed to last one day.</p> <p>1.4 The Parish Council and Neighbourhood Plan Steering Group are aware of the proposals to develop our client's site at Pavenhill. Representatives from Turley and Hills Homes have met with Members of the Parish Council on several occasions to discuss the scheme. Furthermore, a presentation was delivered to Councillors and members of the public at a Purton Parish Council Full Council meeting, held on 08 December 2014.</p> <p>1.5 The site was formally promoted, for potential allocation in the Neighbourhood Plan, on 18 December 2014. Our submission is appended to these representations at Appendix 1.</p> <p>The Scope and Summary of these Representations</p>	<p>Whilst this consultation is about the Purton Neighbourhood Plan (the Plan), this introduction is confusing in that there is much focus on their Planning Application for the Land at Pavenhill.</p> <p>In general while it looks as if the Respondent has mounted a fierce rebuttal of the Plan the Respondent has in fact simply used aspects of the Plan to justify the merits of their Planning Application even though previously argued that the Plan is flawed.</p> <p>Of concern is that the Respondent also sent their response to the Plan to the Planning Appeal for the Land at Pavenhill held the following week on Tuesday 22 August 2017. It suggests that the Respondent objective may have been for the Planning Inspector at that Appeal to</p>	<p>As indicated below</p>
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	COMMENT	RESPONSE	NP MODIFICATION
	<p>1.6 This Consultation Response focusses on key draft policies relevant to the Site and the local context.</p> <p>1.7 We begin by setting out our analysis of each of the key relevant draft policies, their supporting text and the evidence which supports them. We then proceed to analyse the Plan as a whole against the basic conditions. We also provide a brief review of the merits of the proposed development of our client's site at Pavenhill, Purton.</p> <p>1.8 In summary, the representations make the case that the composition of the present draft of the Neighbourhood Plan reveals that there have been fundamental errors in the preparation of the Plan, especially in those policies relevant to the supply of housing. For a range of reasons, the draft Plan is ambiguous and contradictory. It also demonstrates little understanding of the market-led economics of the development process and is, in many respects, unlikely to be deliverable.</p> <p>1.9 Concerningly, the basic premise of the draft Purton Neighbourhood Plan (and its associated evidence base document 'Purton Planning for the Future') is that the many of the key principles of the National Planning Policy Framework (NPPF) and the adopted (post-NPPF) Wiltshire Core Strategy are wrong.</p> <p>Indeed, in reviewing the draft Plan and its evidence base, it becomes apparent that its authors have sought to employ the Plan as a mechanism to express an underlying ideological position; that the current planning system is fundamentally flawed and should be redefined within the microcosm of Purton.</p> <p>1.10 That the draft Plan's authors take a dim view of the planning system is not a concern in its own right. The issue is that a Neighbourhood Plan is not an academic paper. A Neighbourhood Development Plan is a 'real world' document, which once 'made' will constitute part of the statutory Development Plan. It is therefore</p>	<p>make a pre-emptive decision and so thwart the Plan in its progress through the neighbourhood plan process.</p> <p>This consultation was to garner mature, objective responses from key stakeholders particularly the statutory sector and housing developers who had not had the opportunity before to comment on the Plan so as to make it more robust and to ensure it met the National and Local planning policies whilst meeting the needs of the local community.</p> <p>This is pure conjecture by the Respondent; nowhere is this indicated. Indeed, the Plan re-iterates its compliance with the guidance set-out in the NPPF and the Wiltshire Core Strategy.</p> <p>This statement makes generalisations and provides opinions rather than states specific evidence. The Plan does not re-</p>	<p>None needed</p> <p>None needed</p>

	COMMENT	RESPONSE	NP MODIFICATION
	<p>concerning that the draft Plan and its evidence base is conceived of as a vehicle to reinvent and redefine key concepts relating to sustainable development, population forecasting and housing requirements. Such concepts (amongst others) are already established and defined through statute, the NPPF, appeal decisions, Local Plan examinations, judicial rulings and guidance.</p> <p>1.11 Because the draft Plan starts from the position described, it proceeds to deviate from the relevant legislative and planning policy context. The draft Plan ignores the key principles of the NPPF, it misinterprets the strategic policies of the Wiltshire Core Strategy and largely discounts the Guidance provided in the PPG. Likewise, because of its varied shortcomings, the Plan fails to comply with the provisions of the Neighbourhood Planning Act (2017) nor does it meet the ‘basic conditions’, as per paragraph 8(2) of Schedule 4B to the TCPA 1990.</p> <p>1.12 Taking account of the above, we conclude that the draft Neighbourhood Plan is not presently fit to progress further without substantial modification.</p>	<p>define sustainable development, population forecasting or housing requirements.</p> <p>Whilst it indicates a rather overly opinionated view of the Plan, it does not provide any evidence to support this; these points will be dealt with as they occur in section 2.</p>	None needed
	<p>2. Response to Draft Policies</p> <p>2.1 Hills Homes Developments Ltd does not consider that the draft Neighbourhood Plan meets the “basic conditions” (see paragraph 8(2) of Schedule 4B to the TCPA 1990).</p> <p>2.2 In this Section, we set out a series of observations on the policy text, the supporting text and the evidence base document ‘Purton Planning for the Future’ (2015), which supports the Neighbourhood Plan.</p> <p>2.3 We start by examining the draft Plan’s general approach to sustainable development, as this fundamentally influences the general approach to, and formulation of, the Plan’s draft policies.</p>	Statement noted.	None needed

	COMMENT	RESPONSE	NP MODIFICATION
	<p>Sustainable Development</p> <p>Sustainable Development within the Planning System</p> <p>2.4 A draft Neighbourhood Plan only meets the basic conditions if, inter alia, “the making of the Plan contributes to the achievement of sustainable development” (see paragraph 8(2)(d) of Schedule 4B TCPA 1990). Likewise, the Neighbourhood Plans are also required to have regard to “national policies and advice contained in guidance issued by the Secretary of State” (See 065 Reference ID: 41-065-20140306 of the Planning Practice Guidance (PPG)).</p> <p>2.5 069 Reference ID: 41-069-20140306 of the PPG elaborates further in stating that “A neighbourhood plan or Order must not constrain the delivery of important national policy objectives. The National Planning Policy Framework is the main document setting out the government’s planning policies for England and how these are expected to be applied”.</p> <p>2.6 The central theme of the NPPF is the promotion of sustainable development. Indeed, the ‘presumption in favour of sustainable development’ is described as its ‘golden thread’. The NPPF clearly defines sustainable development at paragraph’s 6 and 7;</p> <p>“The purpose of the planning system is to contribute to the achievement of sustainable development. The policies in paragraphs 18 to 219, taken as a whole, constitute the Government’s view of what sustainable development in England means in practice for the planning system.”</p> <p>“There are three dimensions to sustainable development: economic, social and environmental. These dimensions give rise to the need for the planning system to perform a number of roles:</p> <ul style="list-style-type: none"> • <i>an economic role - contributing to building a strong, responsive and</i> 	<p>Noted.</p> <p>For reference; Schedule 4B of the TCPA 1990 is about the process of making Neighbourhood Development Plans and paragraph 8(2) to the conditions a draft order is required to meet for the Independent examination:</p> <p>“A draft order meets the basic conditions if—</p> <p>(a) having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the order,</p> <p>(b) having special regard to the desirability of preserving any listed building or its setting or any features of special architectural or historic interest that it possesses, it is appropriate to make the order,</p> <p>(c) having special regard to the desirability of preserving or enhancing the character or appearance of any conservation area, it is appropriate to make the</p>	<p>None needed.</p>

	COMMENT	RESPONSE	NP MODIFICATION
	<p><i>competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure;</i></p> <ul style="list-style-type: none"> <i>• a social role - supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community's needs and support its health, social and cultural well-being; and</i> <i>• an environmental role - contributing to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy"</i> <p>2.7 Paragraph 16 of the National Planning Policy Framework (the Framework) is concerned with neighbourhood planning: "The application of the presumption [in favour of sustainable development] will have implications for how communities engage in neighbourhood planning. Critically, it will mean that neighbourhoods should:</p> <ul style="list-style-type: none"> <i>• develop plans that support the strategic development needs set out in Local Plans, including policies for housing and economic development; [and] plan positively to support local development, shaping and directing development in their area that is outside the strategic elements of the Local Plan;"</i> 	<p>order,</p> <p>(d) the making of the order contributes to the achievement of sustainable development,</p> <p>(e) the making of the order is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area),</p> <p>(f) the making of the order does not breach, and is otherwise compatible with, EU obligations, and</p> <p>(g) prescribed conditions are met in relation to the order and prescribed matters have been complied with in connection with the proposal for the order."</p>	
	<p>2.8 The promotion of sustainable development is therefore at the very centre of the planning system. As such, it is gravely concerning that the 'Purton Planning for the Future (2015)'¹ denounces the concept of Sustainable Development and seeks to replace it;</p>	<p>The Respondent's concern over the use of the concept of the term "resilience" rather than "sustainability" in the supporting</p>	<p>Revisit the use of the terminology "resilience" and align the supporting text in</p>

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	<p><i>"It is widely recognised that there are no examples of sustainable development (applied to housing) anywhere in the country. The reason for this was that "sustainable development", when it was first developed as a concept in 1972, did not apply to infrastructure, or was ever intended to be. Politicians of all shapes and sizes hijacked this phrase and have been citing it, almost mantra-like, ever since."</i></p> <p>2.9 The document goes on to state that;</p> <p><i>"Several have called for sustainable development to be re-defined.</i></p> <p><i>Ten scientists have proposed a new architecture for sustainable development and published this in one of the foremost scientific journals, Nature; Policy: Sustainable development goals for people and planet. The director of the Stockholm Resilience Centre, Johan Rockström, recently explained in a video why we must redefine sustainable development.</i></p> <p><i>There is a wide consensus that the notion of resilience is more appropriate when considering infrastructure development. Resilience is the concept whereby individuals or communities are able to withstand and respond to shifting circumstances and shocks while continuing to function and prosper, though within constraints.</i></p> <p><i>Put simply, resilience is the ability to survive, recover from, and thrive in changing conditions (which could be flooding, prolonged drought, energy and food price hikes, natural disaster and so on) over foreseeable timescales. The key is to build resilient infrastructure in the village.</i></p> <p><i>House building which generates parking on roads, enlarging schools that cause traffic congestion, housing developments with no planned connections to major roads and thus cause rat-runs through villages, and creating strategic county waste management sites necessitating massive road hauling to a far "corner" of the</i></p>	<p>documentation is noted.</p> <p>Purton ~ Planning for the Future does not denounce the concept of sustainability only postulates in Annex 6 as to whether this is the right term when applied to housing when as opposed to the current thinking of UK Government is clearly around resilience and has issued guidance on this https://www.gov.uk/guidance/resilience-in-society-infrastructure-communities-and-businesses)</p> <p>In real terms it should be noted that for a development to be sustainable it also needs to be resilient but as this term is not included in the NPPF (other than in connection with climate change and flooding) definition of sustainability and related documents are then in order, to avoid similar confusion as cited here. We note that "resilience" is already embedded within UK government https://www.gov.uk/guidance/resilience-in-society-infrastructure-communities-and-businesses) and it</p>	<p>the Plan and Annex 7 of Purton ~ Planning for the Future to be brought into specific conformity with the NPPF and related policies until such time these policies are updated to current UK thinking as indicated</p>

	COMMENT	RESPONSE	NP MODIFICATION
	<p><i>county are all examples of poor spatial planning and lack resilience.”</i></p> <p>2.10 The above argument is irrelevant and misleading for the purposes of a Neighbourhood Development Plan. ‘Resilience’ as defined in Purton Planning for the Future, has no grounding in the statutes, policies and guidance, with which the Neighbourhood Plan must have regard to and comply with. It is an invented term. In contrast, the promotion of ‘sustainable development’ is at the heart of the planning system generally and the NPPF specifically. Indeed, the tripartite definition of sustainable development is to be applied in the context of both plan making and decision taking.</p> <p>2.11 Problematically, the analysis within ‘Purton Planning for the Future’ is not contained to this supporting document; it is applied to and is infused within the draft Neighbourhood Development Plan document itself. The subsequent result is that its policies are misguided and contradictory, and fail to meet the basic conditions in number of respects, as explored within the subsequent sections of this consultation response.</p> <p>2.12 Accordingly, and with regard to sustainable development, our advice to the Neighbourhood Plan Steering Group is to take account the “basic conditions”, as set out at paragraph 8(2) of Schedule 4B to the TCPA (1990), as well as the relevant sections of the PPG and the NPPF. We advise further that the Neighbourhood Development Plan is not vehicle for advancing invented terms / concepts that have no grounding in the planning system</p>	<p>only a matter of time for this to inform national and local policies directly.</p> <p>The Respondent should also note that in the Government Briefing Paper No 06418 12 July 2017 it says: (Section 2.19 Sustainable Development and the Environment) <i>...”It is also proposed to clarify that local planning policies should support measures for the future resilience of communities and infrastructure to climate change”</i></p> <p>Noted as above.</p>	
	<p>Housing</p> <p>Population Forecasts and Housing Needs Projections</p> <p>2.13 As with the concept of ‘sustainable development’, the draft Neighbourhood Plan seeks to go well beyond its remit, by attempting to project Purton’s future population growth and calculate a separate housing requirement for the Parish.</p>	<p>Identifying the potential growth of a community area is essential to determine the number of houses</p>	<p>None needed</p>

	COMMENT	RESPONSE	NP MODIFICATION
	<p>This is seen in Annex 3 of the 'Purton Planning for the Future'. The analysis starts from the subjective premise that the NPPF (at paragraph 159) is wrong, with regards to acknowledging and planning for patterns of migration within demographic change;</p> <p><i>"The National Planning Policy Framework argues that sufficient housing should be provided to meet the needs and demand of the population, including that associated with migration and demographic change. Yet what we really see is that the policy, far from ensuring sufficient housing for local people, is actually enhancing an unbalanced inward migration, distorting community demographics."</i></p>	<p>required and it is not beyond the remit of the Plan to do so.</p> <p>The analysis in Appendix 3 of Purton ~ Planning for the Future does not argue the NPPF is wrong and it is incorrect to make this assumption. The statement quoted is taken out of context but needs to be clarified.</p>	<p>Revisit the statement top of page 14 in Purton ~ Planning for the Future to clarify that this is about the type of housing mix in infill sites which tends to distort the type of inward migration.</p>
	<p>2.14 The implication of the above statement is that Purton should provide only for the housing needs of the village itself, without making provision for wider housing needs.</p>	<p>There has been much discussion that the majority of new development should be in major urban areas where the main infrastructure, employment, retail and leisure facilities are located. It reduces car travel and enables better use of public transport so reducing the impact on climate change.</p> <p>This is reflected in "The spatial vision for Wiltshire" in the Core Strategy where it states: <i>"By 2026 Wiltshire will have stronger, more resilient communities based on a sustainable pattern of development, focused principally on Trowbridge,</i></p>	<p>None needed</p>

	COMMENT	RESPONSE	NP MODIFICATION
		<p><i>Chippenham and Salisbury. Market towns and service centres will have become more self-contained and supported by the necessary infrastructure, with a consequent reduction in the need to travel. In all settlements there will be an improvement in accessibility to local services, a greater feeling of security and the enhancement of a sense of community and place. This pattern of development, with a more sustainable approach towards transport and the generation and use of power and heat, will have contributed towards tackling climate change.”</i></p> <p>Core Policy 1 identifies the settlements where sustainable development will take place. Principal Settlements of Chippenham, Trowbridge and Salisbury are the primary focus for development, Markets Towns have the ability for significant development, Local Service Centres provide for a modest level of development and at Large and Small Villages development “<i>will be limited</i></p>	

	COMMENT	RESPONSE	NP MODIFICATION
		<p><i>to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities”.</i></p> <p>Further in paragraph 4.15 it goes on to state that <i>“At the settlements identified as villages, a limited level of development will be supported in order to help retain the vitality of these communities. At Large Villages’ settlement boundaries are retained and development will predominantly take the form of small housing and employment sites within the settlement boundaries.”</i></p> <p>This is about local need and Neighbourhood Plans are all about “local need”, this Plan seeks to do just that.</p> <p>This is expressed in paragraph 4 of Purton ~ Planning for the Future.</p> <p>The suggestion that the Plan ignores inward migration is incorrect. In calculating the population growth of Purton to the end of the plan period, it identifies that Purton’s death rate is higher than its birth rate and it identifies that the growth</p>	

	COMMENT	RESPONSE	NP MODIFICATION
		of Purton comes totally from inward migration.	
	<p>The relevant Housing Market Area (HMA), as currently defined in the Adopted Wiltshire Core Strategy, is the North and West Housing Market Area (NWHMA), which includes the north and west of Wiltshire. However, it is also the case that Purton is part of Swindon's functional economic and housing market area (HMA).</p> <p>2.15 The 'local only' stance of the Neighbourhood Plan, and its evidence base, appears markedly at odds with the position of both Swindon Borough Council and Wiltshire Council. These LPA's have indeed jointly prepared a cross-boundary analysis of housing need, the; Wiltshire and Swindon Strategic Housing Market Assessment (SHMA) (2017) as well as a Functional Economic Market Area Assessment (FEMAA) (2017).</p> <p>2.16 Although these jointly prepared Swindon Borough Council and Wiltshire Council documents have yet to be formally published, Swindon Borough Council has made public their key findings. Of particular relevance is the fact that the housing market areas considered do not align with the housing market areas identified in the Wiltshire Core Strategy. Instead, they cross the LPA boundary, so as to more faithfully reflect functional housing and economic markets;</p> <p><i>"As reported to previous JSEC meetings, four HMAs are identified centred on Chippenham, Salisbury, Swindon and Trowbridge. Taken as a whole the four HMAs align to the Swindon and Wiltshire unitary authority areas. The individual HMAs do not align with the individual local authority boundaries or correspond to the HMAs planned for in the adopted Wiltshire Core Strategy and Swindon Local Plan."</i>²</p> <p>2.17 The report adds that;</p> <p><i>"Effective plan-making would involve future joint working between Swindon Borough and Wiltshire Councils on the following strategic priorities which could</i></p>	<p>The February 2017 Joint Strategic Economic Committee meeting reported that the four HMAs it has identified are centred on Chippenham, Salisbury, Swindon and Trowbridge which do not correspond to the HMAs defined in the adopted Wiltshire Core Strategy and Swindon Local Plan.</p> <p>The SHMA provides independent projections for new homes and jobs looking ahead to 2036 and is an important part of the evidence base for the review of housing and employment needs of the area for the next plan period. The data have not been tested or thoroughly examined. The study does not alter the current Wiltshire Core Strategy that covers the period to 2026 and is the plan period to which the Purton Neighbourhood Plan relates. The housing requirements contained in the Core Strategy have been thoroughly tested and successfully passed through</p>	<p>None needed at this time until the SHMAA has been tested and examined</p>

	COMMENT	RESPONSE	NP MODIFICATION
	<p><i>have cross boundary implications:</i></p> <ul style="list-style-type: none"> <i>The quantum and spatial distribution of new homes and jobs within the Swindon HMA....”³</i> <p>2.18 It is clear then that migration and economic relationships are an integral part of a market-based housing system. For the Neighbourhood Plan to reject this is to ignore the requirements of the NPPF, which at paragraph 47 indicates housing need is to be considered across HMAs. In other words, it is not logical.</p>	<p>examination processes and took into account a range of considerations, such as environmental constraints. They are the appropriate policies against which the Plan should be assessed.</p> <p>The projections produced by the SHMA and FEMAA have yet to be tested and are a first step in the local plan review process. The Plan does not ignore the objectives of paragraph 47 in the NPPF but it is the responsibility of the LDP to meet these. The Plan sets out to support the objectives and policies in the LDP (Wiltshire Core Strategy) as it currently stands</p>	
	<p>2.19 Because of the position adopted, ‘Purton Planning for the Future’ takes the view that the Purton Neighbourhood Plan should not plan for or meaningfully acknowledge population growth associated with migration. For example, this document and draft Neighbourhood Plan exclude from its analysis (of projected population growth) any growth arising from Mouldon View or Ridgeway Farm, noting that these developments are to meet Swindon’s not Wiltshire’s housing need. In this regard, there is a clear confusion about what constitutes housing need (i.e. demand for homes), as driven by a range of factors</p> <p>2.20 To explain this, I refer to the Mouldon View or Ridgeway Farm sites highlighted. In this respect, it is true that Wiltshire Council excludes these sites from its calculations of housing land supply. But this is simply a feature of the way</p>	<p>The sweeping statement that Purton ~ Planning for the Future does not acknowledge migration is incorrect. The growth of the village comes from inward migration; Annex 3 of Purton ~ Planning for the Future.</p> <p>The Respondent acknowledges that Wiltshire Council has not taken either Mouldon View or Ridgeway</p>	None needed

	COMMENT	RESPONSE	NP MODIFICATION
	<p>housing supply is calculated and an outcome of the administrative boundaries of Wiltshire and Swindon (as respective LPAs), as well as a supply side choice about where housing should be located.</p> <p>2.21 However, from the demand side, Purton is functionally part of a cross-boundary housing market area, which is driven by Swindon. This is seen in how Purton's residents access Swindon for major services and employment opportunities. This position is now openly acknowledged by Wiltshire Council and Swindon Borough Council, through their progression of a joint SHMAs and FEMAA. From this perspective, sustainable sites adjacent to the settlement boundary of Purton could contribute to meeting housing need, as a supply side choice about where to locate housing growth.</p>	<p>Farm into account for its calculation of land housing supply but then disdainfully dismisses this as an outcome of administrative boundaries.</p> <p>That the houses at Mouldon View and Ridgeway Farm which adjoin Swindon are to meet Swindon's population growth has been tested at two planning appeals.</p>	
	<p>2.22 A separate concern is that the modelling of population and household growth is simplistic and unlikely to be unreliable. The analysis, as set out in Purton Planning for the Future, derives from an interpretation of ONS data. Yet, as Purton Planning for the Future tacitly acknowledges at various junctures (between pages 12 and 16 of the report), is it not particularly practicable to disaggregate population trends to such a localised level, because ONS data is modelled for different spatial scales and becomes relatively more sparse at Lower Super Output Area and Middle Layer Super Output Level. Furthermore, there is no additional modelling or interpretation to account for other influences on household projections. For example, there is no attempt to consider the impacts of economic growth in the region/ sub-region. Similarly, there is no consideration of how the delivery of affordable housing requires a proportionate uplift in overall housing provision, for reasons of viability (as is recognised in the SHMA).</p> <p>2.23 It is acknowledged that Neighbourhood Plans need not be supported by as extensive an evidence base as Local Plans. Yet, even when allowing for its proportionate nature, the evidence put forward in support of the draft Purton</p>	<p><i>("unlikely to be unreliable" = reliable though unlikely it is what is meant)</i></p> <p>An unsupported view not supported by evidence. It would be true to say that the further forward in time, the less reliable a forecast will be though that is the nature of any forecast.</p> <p>No consideration has been given in the forecast to identify any proportional uplift for the delivery of affordable housing as it will not</p>	<p>None needed</p> <p>None needed</p>

	COMMENT	RESPONSE	NP MODIFICATION
	Neighbourhood cannot be regarded as robust.	have any impact on forecasting population growth	
	<p>2.24 However, the main problem with the Purton Neighbourhood Plan is that, in progressing its own population projections and analysis of a localised housing requirement, it is not deriving its figures from the housing requirement set out in the strategic policies of the Wiltshire Core Strategy. We would refer the Neighbourhood Plan Steering Group back to paragraph 16 of the NPPF. This requires groups responsible for preparing such Plans to; <i>“develop plans that support the strategic development needs set out in Local Plans, including policies for housing and economic development”</i>.</p> <p>2.25 The current housing requirement for Wiltshire (2006-2026) is expressed in Core Policy 2 of the Core Strategy, as being a minimum of 42,000 dwellings to be delivered across the LPA and 24,740 units to be provided in the North and West Housing Market Area (NWHMA) specifically. This is based on the analysis set out in the Wiltshire Strategic Housing Market Assessment (SHMA) 2012. Core Strategy Core Policy 19 apportions 1,455 dwellings to the Royal Wootton Bassett and Cricklade Community Area, within which Purton is located, with the majority of this growth being apportioned to Royal Wootton Bassett Town and the remaining 358 to be located within the wider community area.</p> <p>2.26 As such, the starting point for a Neighbourhood Plan must be the identification of objectively assessed housing needs by the Local Planning Authority and it is not for a Neighbourhood Plan to determine the level of housing requirement. Indeed, as noted, Wiltshire Council and Swindon Borough Council are preparing a joint SHMA, and it is this document that will further update the relevant OAN figure. It is at this current time unknown what the spatial distribution of this updated requirement will be. However, given Purton’s role as a ‘Large Village’ it is likely that an increased proportion of housing growth (above that predicted in the document Purton Planning for the Future) will be required</p>	<p>Noted but the quote goes on to say : <i>“plan positively to support local development, shaping and directing development in their area that is outside the strategic elements of the Local Plan; and”</i></p> <p>Agreed, Core Policy 19 states that 358 houses are to be located in the wider community area outside Royal Wootton Bassett. It goes on to state there were 248 completions 2006-14 and 24 specific permitted site leaving just <u>113 to be identified</u></p> <p>The Plan used the Wiltshire Housing Land Supply 2015 figures recorded this number had reduced to 63 houses still to be identified in the Royal Wootton Bassett and Cricklade rural area. This covers the eleven parishes of Braydon, Broad Town, Clyffe Pypard, Cricklade, Latton, Lydiard Millicent, Lydiard Tregoze, Lyneham and Bradenstoke, Marston Meysey, Purton,</p>	None needed

	COMMENT	RESPONSE	NP MODIFICATION
	<p>before 2026. Indeed, it is notable that Wiltshire Council is currently consulting on its pre-submission draft Site Allocations Plan and is committed to an early review of its Core Strategy.</p> <p>2.27 In attempting to independently model future population and household growth (and by explicitly applying this analysis within the draft Plan), the Neighbourhood Plan (which once made will become part of the Development Plan) is effectively seeking to extend beyond its remit. This occurs because the Plan seeks to circumvent the spatial and delivery strategy as set out in the Wiltshire Core Strategy at Core Policies 1 and 2, as well as the Core Strategy's strategic policies regarding the requirement for, and supply of, housing. Likewise, the Neighbourhood Plan cannot ignore the direction of travel as denoted by the joint Wiltshire - Swindon SHMA and FEMAA.</p>	<p>Tockenham.</p> <p>The latest Wiltshire Housing Land Supply Statement Update, March 2017 indicates that 0 homes still need to be identified in the Royal Wootton Bassett and Cricklade rural area compared to the 63 identified in the draft Plan. This number is expressed in the core strategy as 'approximately' therefore the additional 94 homes to 2026 proposed in the draft Plan remains appropriate for the village.</p> <p>With regard to the last sentence, as previously stated how the SHMA and FEMAA will affect the direction of travel for Purton cannot be meaningfully assessed until the SHMAA has been tested and examined.</p>	<p>None needed at this time until the SHMAA has been tested and examined</p>
	<p>2.28 We draw your attention to the Planning Practice Guidance (PPG) 009 Reference ID: 41-009-20160211;</p> <p><i>"Although a draft neighbourhood plan or Order is not tested against the policies in an emerging Local Plan the reasoning and evidence informing the Local Plan process is likely to be relevant to the consideration of the basic conditions against</i></p>	<p>Paragraphs 009 and 040 Reference ID: 41-099002160211 from the Neighbourhood Planning Guidance are noted for reference.</p>	<p>None needed</p>

	COMMENT	RESPONSE	NP MODIFICATION
	<p><i>which a neighbourhood plan is tested. For example, up-to-date housing needs evidence is relevant to the question of whether a housing supply policy in a neighbourhood plan or Order contributes to the achievement of sustainable development.”</i></p> <p>2.29 Furthermore, there has to be robust evidence to support particular policies, the PPG at Paragraph 040 ref 41-040-20160211 states:</p> <p><i>“While there are prescribed documents that must be submitted with a neighbourhood plan or Order there is no ‘tick box’ list of evidence required for neighbourhood planning. Proportionate, robust evidence should support the choices made and the approach taken. The evidence should be drawn upon to explain succinctly the intention and rationale of the policies in the draft neighbourhood plan or the proposals in an Order. A local planning authority should share relevant evidence, including that gathered to support its own plan making, with a qualifying body.</i></p> <p><i>..... 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. In particular, where a qualifying body is attempting to identify and meet housing need, a local planning authority should share relevant evidence on housing need gathered to support its own plan-making”</i></p>		
	<p>2.30 Significantly, the flawed analysis described above is not restricted to the ‘Purton Planning for the Future’ supporting document. Rather, it is infused within the policies the draft Plan seeks to advance. Indeed, the supporting text to the draft housing policies explicitly refers back to the Purton Planning for the Future document, stating (for example) that;</p> <p><i>“Purton ~ Planning for the Future” reviewed the potential sites within this existing</i></p>	<p>The quote is drawn from the Plan (as an example) but the last sentence quoted has been truncated and taken out of context. The full sentence is: <i>“Whilst these infill sites have the potential to meet a substantial part of Purton’s future</i></p>	<p>None needed.</p>

	COMMENT	RESPONSE	NP MODIFICATION
	<p><i>settlement boundary and determined that there is potentially sufficient infill sites, as preferred for development by the WCS for large villages, to meet the potential local housing needs for the village until the end of this plan period 2026. Whilst these infill sites have the potential to meet a substantial part of Purton's future housing need for 94 houses⁴",</i></p> <p>2.31 As a result (and as is more fully illustrated below) the draft Neighbourhood Plan does not conform to the strategic policies of the Wiltshire Core Strategy, nor does it meet the basic conditions. We invite the Neighbourhood Plan Steering Group to revisit the relevant sections of the PPG at, paragraphs; 009 Reference ID: 41-009-20160211; Paragraph: 040 Reference ID: 41-040-20160211; Paragraph: 044 Reference ID: 41-044-20160519 and Paragraph: 069 Reference ID: 41-069-20140306. Each of these paragraphs refers to the central importance of up-to-date housing needs evidence and the strict requirement not to constrain Local Plan and national policy objectives.</p>	<p><i>housing need for 94 houses, they generally do not yield the size and type of housing such as affordable housing, properties for first time buyers, smaller properties for those wishing to downsize and properties suitable for older people including bungalows that are needed in Purton."</i> It is simply an observation of the real world of Purton housing and does not represent a conflict with Wiltshire Core Strategy.</p> <p>The statement in the Plan is numerically correct. The identified sites within the settlement boundary can potentially provide more housing than the 63 that have still to be identified for the whole of the remaining area of the Royal Wootton Bassett and Cricklade Community Area.</p> <p>The Plan, and the supporting document Purton ~ Planning for the Future use the housing numbers from the Wiltshire Core Strategy as updated by Wiltshire's Housing Land Supply Statement 2015.</p>	<p>Review the latest Housing Land Supply Statement published March 2017.</p>

	COMMENT	RESPONSE	NP MODIFICATION
	<p>Housing Policies</p> <p>Purton Policy 12: Development Principles</p> <p><i>In-Settlement Sites</i></p> <p>2.32 Draft Purton Policy 12 identifies six sites within the Purton Settlement Boundary that are indicated as having the potential to deliver approximately 75 dwellings. These are;</p> <ul style="list-style-type: none"> • Site 66 - Derelict Cottage Farm (College Farm) - 11 dwellings. • Site 91 - Land at Northcote - 15 dwellings. • Site 3316 - three sites in Dogridge - 7 dwellings (but across separate sites). • Site 3318 - Hooks Hill - 14 dwellings (but would result in the loss of 25). • Land at North View - 12 dwellings (but not promoted in the SHLAA). • Former Youth Centre (with the adjoining garages and green space) - 7 dwellings (but not promoted in the SHLAA). <p>2.33 The draft policy then goes on to state that these sites should be developed before land outside of the existing settlement boundary. There are a number of concerns regarding this strategy.</p> <p>2.34 Firstly, the quantum of dwellings to be delivered on the sites identified is very ambiguous. Draft Purton Policy 12 suggests that approximately 75 dwellings will be delivered. However, a review of the assessment of these sites (as set out in Annex 8 of Purton Planning for the Future) suggests that only 66 can be delivered. Furthermore, it is noted that the site at Hooks Hill already includes 25 existing dwellings, which would need to be demolished to accommodate a replacement scheme of 14 dwellings. Purton Planning for the Future acknowledges this stating; <i>“Any development at Hooks Hill would replace the existing building and thus is unlikely to provide any net increase in the total number of dwellings”</i>⁵. Indeed, it is</p>	<p>The draft Purton Policy 12 identifies a total of 75 dwellings only across the six sites listed, it does not itemise the numbers of houses per site.</p> <p>The number of house listed per site quoted here are derived from Purton ~ Planning for the Future where number of houses per site are based on Wiltshire Council’s SHLAA Methodology (September 2011) for calculating housing density (to provide consistency with the SHLAA calculations).</p> <p>However for site 3316, ten units have been indicated rather than seven and for site 3318, 20 units rather than 14. This accounts for the total of 75. The numbers do not take into account any windfall sites that might occur.</p> <p>The Wording for sites 3316 and 3318 in “Purton ~ Planning for the</p>	<p>Clarify the numbers of houses for sites 3316 and 3318 in “Purton ~ Planning for the Future” and change these to those recommended by the site representatives</p> <p>None needed</p>

	COMMENT	RESPONSE	NP MODIFICATION
	<p>likely that the development of that site will result in a net loss of dwellings.</p> <p>2.35 Secondly, the draft policy presumes that all of the in-settlement sites identified will come forward for development and be delivered. However, it is unreasonable to assume that every site identified as having potential will actually come forward for development. Indeed, even if planning applications are submitted in relation to these sites, and permission is granted, it is reasonable to assume that a percentage of these net permissions will 'lapse'. Wiltshire Council, when it assesses of its land supply position, assumes a lapse rate of 13.4 percent for all small sites. This is based on observed long-term trends apparent through the monitoring of completions data⁶. Furthermore, it is notable that neither land at North View or the Former Youth Centre was promoted in the 2015 SHLAA Call for Sites consultation. In the absence of proper evidence (required by the PPG at Paragraph 040 reference 41-040-20160211), these sites they cannot be considered realistically deliverable.</p> <p>2.36 The issue described above is exacerbated by the linking of draft Purton Policy 12 to draft Purton Policy 13, 'Development outside of the settlement boundary'. This linkage is through the criteria (set out in Policy 12) that all in-settlement sites should come forward for development before land outside of the settlement boundary. This is problematic, because there is no guarantee that all of the in-settlement sites will actually be developed and, as such, it is possible (indeed, likely) that draft Purton Policy 13 will never be activated. It is therefore not at all clear how a decision maker could be expected to confidently apply the policy in relation to the determination of planning applications and thus the policy cannot be said to meet the requirements of the PPG at paragraph 041 Reference ID: 41-041-20140306.</p> <p>2.37 Furthermore, a broader effect of the restrictive caveat as currently applied to draft Purton Policy 12, is to undermine the internal coherence of the draft Neighbourhood Plan's approach housing development. This is to say that the draft</p>	<p>Future" needs to be clarified to avoid the confusion shown.</p> <p>In relation to Hooks Hill, there is a possibility it may not provide a net gain but with the 40 units identified for outside the settlement boundary, the total will meet the housing numbers</p> <p>Agreed the statement in Policy 12 that requires housing within the settlement boundary to be brought forward before land outside the settlement boundary may be counter-productive and prevent development taking outside the settlement boundary if not all the sites are developed. The basic objective is to ensure development outside the boundary should not be undertaken first at the expense of development inside the boundary as preferred by residents.</p>	<p>None needed</p> <p>Revise wording in Policy 12 to remove this restriction.</p>

	COMMENT	RESPONSE	NP MODIFICATION
	Plan already acknowledges that not all housing needs identified can be met on small sites within the existing settlement boundary. Similarly, the Plan also acknowledges that the development of larger sites, outside of the settlement boundary, is necessary to deliver affordable housing and other forms of accommodation, which the Plan identifies as being required in order to meet local needs. Yet, through this draft policy, the Plan also seeks to prevent these new homes being built.		
	<p>2.38 Because of the issues identified above, draft Purton Policy 12 also conflicts with Core Policy 2 of the Wiltshire Core Strategy. This strategic policy allows for development outside of settlement boundaries in a number of circumstances. For example, Core Policy 44 allows for rural exception schemes to deliver affordable housing, but recognising that a component of market housing is required to make such schemes financially viable. Similarly, Core Policy 46 allows for the development of specialist accommodation for vulnerable and older people, again outside of settlement boundaries.</p> <p>2.39 Thirdly, in identifying sites within the settlement boundary, draft Purton Policy 12 has effectively only identified sites that would already be regarded as having the potential for windfall development, in accordance with the presumption in favour of sustainable development (as set out in the NPPF) and in accordance within Core Policy 2 of the Wiltshire Core Strategy. Indeed, Wiltshire Council's housing trajectories already assume that a quantum of small scale developments (within settlement boundaries) will come forward each year. In this respect, Purton Policy 12 does not have a clear purpose.</p> <p>2.40 Draft Purton Policy 12 therefore largely duplicates an existing strategic policy in the Core Strategy (Core Policy 2), which already applies the presumption in favour of sustainable development within defined settlement boundaries. However, the draft policy places additional burdens on developers who may bring forward the identified insettlement sites (e.g. by requiring specialist</p>	<p>Policy 12 deals only with sites within Purton's settlement boundary and is not in conflict with either Core Policy 1 or Core Policy 2.</p> <p>Policy 13 deals with a larger site outside the settlement boundary to provide more houses to give a better housing mix to meet Purton's needs.</p> <p>Note that Core policy 44 Rural Exceptions is solely for affordable housing of 10 dwellings or less and Core Policy 46 is for vulnerable and older people to provide nursing accommodation, residential homes and extra care facilities. The latter is not covered in the Plan.</p>	<p>None needed</p> <p>None needed</p>

	COMMENT	RESPONSE	NP MODIFICATION
	accommodation types). In this respect, it actually makes it less likely that these in-settlement sites will be brought forward for development, than if the existing Core Policy 2 was applied in isolation. As we explain in greater depth below, this cannot be regarded as a robust approach.		
	<p><i>Responding to Local Needs</i></p> <p>2.41 Draft Purton Policy 12 sets out that the small in-settlement sites identified shall be <i>“affordable housing, houses for first-time buyers, smaller properties for those who wish to down-size or properties that are suited to older people (including bungalows) in accordance with Wiltshire Core Strategy Core Policies 43 and 45.”</i> adding that <i>“Land at the former youth centre is particularly suited to providing low cost homes”</i>.</p> <p>2.42 There are a number of concerns regarding how this would work in practice;</p> <p>2.43 Firstly, it is worrying that the draft policy expects small sites to <i>“respond to the housing needs of Purton”</i> whilst the supporting text to the same policy recognises that this is not a realistic proposition;</p> <p><i>“...small infill sites generally do not yield the size and type of housing such as affordable housing, properties for first time buyers, smaller properties for those wishing to downsize and properties suitable for older people including bungalows that are needed in Purton.”⁷</i></p> <p>2.44 Indeed, the draft policy ignores that fact that small scale developments (of 10 or fewer dwellings) are generally not required to provide affordable housing (and would not be at Purton). This is in accordance with the PPG, as updated in June 2016, with the revised guidance giving legal effect to the Written Ministerial Statement of 28 November 2014. As such, the draft policy is incorrect to anticipate that affordable units will be provided at the sites at Dogridge or the Former Youth</p>	<p>The sentence has been truncated and so is misrepresenting its context. Policy 12 says <i>“Proposed development should: - respond to the housing needs of Purton in terms of delivering affordable housing, houses for etc...”</i></p> <p>The quoted text is an observation on the real world and starts the justification for Policy 13 for a site outside the settlement boundary.</p> <p>Of the six sites in Policy 12, four are greater than ten dwellings and so would expect to contribute to affordable housing (unless the developer decided to build no more than ten houses per site)</p>	<p>None needed.</p> <p>Move the paragraph before Map 11 to after (review wording to clarify)</p> <p>Possible clarification regarding small sites required.</p>

	COMMENT	RESPONSE	NP MODIFICATION
	<p>Centre.</p> <p>2.45 Furthermore, it is paradoxical that the draft policy seeks to deliver <i>“properties that are suited to older people”</i> but also supports the redevelopment of a site at Hooks Hill which already contains 25 <i>“studio size retirement apartments / sheltered housing”</i>⁸. These will potentially be lost and replaced by a wider mix of 14 dwellings.</p> <p>2.46 The points described above serve to illustrate the shortcomings of preparing a Neighbourhood Plan, which seeks to prioritise development within the settlement boundary, rather than facilitating development which might most effectively meet the identified needs of different communities / demographic groups. In this respect, the draft Plan fails to promote the social dimension of sustainable development, as set out within the NPPF. Because of this it is doubtful that the making of the Plan would contribute to the achievement of sustainable development or comply with the strategic policies of the Wiltshire Core Strategy, as is required to meet the Basic Conditions.</p>	<p>Of the two sites: Dogridge is earmarked by Green Square for affordable homes (application submitted) and the Former Youth Centre is owned by the Parish Council.</p> <p>Hooks Hill built in 1970 for “older people” no longer meets the criteria/regulations for sheltered housing.</p>	<p>Clarify statement page 73 in Purton ~ Planning for the Future. Also remove reference to Hooks Hill last bullet point in 3.14 of the Plan.</p>
	<p><i>Viability</i></p> <p>2.47 In addition to the contradictions described, draft Purton Policy 12 (and indeed the Neighbourhood Plan in general) infers a worrying lack of understanding with respect to the viability and thus deliverability. Indeed, to the extent that viability is considered at all, it is done so in terms which flatly contradict national policies. In this respect, Purton Planning for the Future (2017) states that;</p> <p><i>“The difficulty that arises is how to encourage a house builder to build a small number of smaller houses on a finite piece of land which may not maximise the potential return. An argument yet to be tested is that given a choice that a certain parcel of land could be built upon, yet with only smaller houses, a builder may consider that 80% of something may be better than 100% of nothing.</i></p>	<p>Paragraph 2.22 above complained “there is no consideration of how the delivery of affordable housing requires a proportionate uplift in overall housing provision, for reasons of viability” but then complains when one is put forward. Possibly this paragraph needs refining to ensure its objective is not misunderstood.</p>	<p>None needed.</p>

	COMMENT	RESPONSE	NP MODIFICATION
	<p><i>An alternative would be to negotiate a certain number of smaller houses and one or two larger ones. This would be greater than the local need and may require perhaps five houses per year (four smaller ones and one larger one).⁹</i></p> <p>2.48 We advise (as per the PPG, at Paragraph: 005 Reference ID: 10-005-20140306) that Neighbourhood Plan's <i>"should be based on a clear and deliverable vision of the area. Viability assessment should be considered as a tool that can assist with the development of plans and plan policies."</i></p> <p>2.49 Similarly, we refer to the NPPF at paragraph 173;</p> <p><i>"Pursuing sustainable development requires careful attention to viability and costs in plan-making and decision-taking. Plans should be deliverable. Therefore, the sites and the scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened. To ensure viability, the costs of any requirements likely to be applied to development, such as requirements for affordable housing, standards, infrastructure contributions or other requirements should, when taking account of the normal cost of development and mitigation, provide competitive returns to a willing land owner and willing developer to enable the development to be deliverable."</i></p> <p>2.50 It is evident from the above section of Purton Planning for the Future that there is no clear understanding of viability. This has resulted in draft Purton Policy 12 seeking unrealistic and burdensome expectations, which will impede delivery. Such an approach conflicts with the aforementioned paragraphs of the NPPF and the PPG, and therefore cannot be considered to comply with the 'basic conditions'. To reiterate, Neighbourhood Development Plans must promote sustainable development, which includes viability, and must have appropriate regard to national policies and advice contained in the National Planning Policy Framework</p>	<p>Basically however it is recognition of the real world where developers seeking to maximise their returns on small infill sites tends to result in large houses being built that generally do not meet the local housing need for many.</p> <p>However developers can if they wish provide a better mix to meet the local needs such as the infill site at Smiths Court which goes a long way towards this compared to the large expensive houses at Battlewell which are out of proportion with local needs. Both sites are built by the developer that the Respondent represents.</p> <p>How different developers perceive viability of a site will vary dependent on their financial and operational models together with prevailing market forces. It is not a fixed constant across developers.</p>	

	COMMENT	RESPONSE	NP MODIFICATION
	(NPPF).		
	<p><i>Relationship with Wiltshire Core Strategy Policies 43 and 45</i></p> <p>2.51 A more general concern relates to the relationship between Purton Policy 12 and the Wiltshire Core Strategy at Policies 43 and 45. This is to say that the type and mixture of dwellings sought by draft Purton Policy 12 does not correlate with the requirements set in the Core Strategy's strategic policies.</p> <p>2.52 With respect to the relationship with Core Policy 43, the main shortcoming is that this policy (in seeking affordable housing contributions of sites of five dwellings or more) does not take account of the revised PPG guidance relating to affordable housing. This is to say (and as noted previously) that affordable provision shall not be required in relation to developments of 10 dwellings or fewer.</p> <p>2.53 In addition, it is not clear from the wording of draft Purton Policy 12 whether affordable housing is to be delivered in addition to, or in place of, the other forms of specialist accommodation (such as properties suited to older persons) which the draft policy seeks. This is significant, because it has the potential to impact on the financial viability of any proposed development. This is important because it has the potential to impede the delivery of sites, by rendering them unviable.</p> <p>2.54 Further, because matters of viability have not been afforded proper consideration (in the formulation of Draft Purton Policy 12) there is potential for conflict with Core Strategy Core Policy 43. This is because this Core Strategy policy makes it clear that issues relating to viability will be considered, in relation to the provision of affordable homes. Therefore, the ambiguity of draft Purton Policy 12 means that (when determining applications for development) planning officers will not know whether to give primacy to affordable housing (as per Core Policy 43) or</p>	<p>The condition in Policy 12 states development should respond to affordable housing etc (but) in accordance with Core Policies 43 and 45.</p> <p>This condition is not in addition to the number of affordable homes cited in Core Policy 43 (as amended by PPG guidance).</p>	<p>None needed.</p> <p>None needed.</p>

	COMMENT	RESPONSE	NP MODIFICATION
	other forms of accommodation sought in the draft Neighbourhood Plan Policy. As such, draft Purton Policy 12 cannot be said to be in general conformity with Core Policy 43 of the Wiltshire Core Strategy.		
	<p>2.55 With respect to the relationship with Core Policy 45 (another strategic policy), the issue here is that this policy is quite specific in requiring the housing mix of proposals to be in accordance with the mix identified in the Wiltshire SHMA, any subsequent update or successor, or another credible evidence source. The draft Neighbourhood Plan document in itself does not provide such credible evidence, because it simply cross-references to supporting documents; notably the Purton Planning for the Future (2017) report and the Purton Parish Plan (2014). The question is then whether these documents actually provide any credible evidence either and this is explored below.</p> <p>2.56 The Purton Planning for the Future report provides some commentary at Annex 4 in relation to ‘Types of Houses’. The report (at page 17) anecdotally states that;</p> <p><i>“Whilst open market housing is just that (that is, anyone can buy, whoever they are, and wherever they are from) it does tend to have disenfranchised those from within the village. This is because the houses have been far too large and therefore of a price range outside that which is affordable by first-time local buyers, and too large for those (usually older residents) already in the village seeking to downsize, and liquidate some of their housing asset.”</i></p> <p>2.57 The document then provides a breakdown of properties by Council tax band noting that only 20 percent of dwellings are in lower tax bands A and B. Likewise there is some analysis of the types of houses (by bedroom number) built since the year 2000, which suggests that 3 bedroom dwellings are the most</p>	<p>The housing mix used in the Plan is not in conflict with Core Policy 45</p> <p>The quote is a recognition that house size in infill generally tends to be large houses which tend to discriminate against local first time buyers and older residents who want to downsize but stay in the village. For example, Purton has a lower population of younger people in their 20 to mid-thirties who have to move out of the village to find homes.</p> <p>The analysis of the tax bands shows that Purton has a very different housing mix to the rest of Wiltshire and to the country as a whole which provides credible</p>	<p>None needed.</p> <p>To support the tax band data in Purton ~ Planning for the Future, add chart showing the mix of</p>

	COMMENT	RESPONSE	NP MODIFICATION
	commonly built format. However, neither the reference to council tax banding nor completions actually provides any evidence as to what the local need is currently or is projected to be throughout the Plan period. Therefore the Purton Planning for the Future document does not actually provide any useful analysis in respect of a locally relevant housing mix and cannot be considered as credible evidence for the purposed of Core Strategy Policy 45.	evidence that it is more difficult to get affordable and lower cost homes in Purton. Consider adding the bedroom mix from the 2011 census to support.	bedrooms numbers from the 2011 census
	<p>2.58 The Purton Parish Plan is also cited in the draft Neighbourhood Plan (and Purton Planning for the Future, at page 17) as providing such evidence. However, all the Parish Plan does (in respect of its commentary of housing) is provide a snapshot of the (then) existing housing and demographic mix of Purton, and illustrate the results of a local survey. The results of this survey indicated that respondents (i.e. local residents) favoured a varied mix of dwelling types, with the most popular preference being for the conversion of existing buildings. Other categories included 'smaller groups of less than 10'. What this indicates it that the survey was not actually seeking to assess local housing needs. Rather, the survey sought to ascertain generally what sort of developments respondents would like to see. Accordingly the Parish Plan cannot be regarded as 'credible source of evidence', for the purposes of satisfying Core Policy 45, for the simple reason that it does not actually present any objective analysis regarding local housing need.</p> <p>2.59 We note that a Local Housing Needs Survey was undertaken in 2012, as facilitated by Wiltshire Council. This document identifies a requirement for more affordable homes and a mixture of dwelling types including 1 bedroom flats and 2 and 3 bedroom dwellings. However, it is highly relevant that the survey was targeted at individuals and households whose housing needs were unlikely to have been satisfactorily met. Indeed, it is highly notable that 85.2 percent of respondents to the survey did not own property or declared zero or negative equity in their homes. Likewise the majority of respondents reported low household incomes.</p>	<p>Noted</p> <p>The consultation for the Purton Housing Needs Survey included the whole population of the parish and was not just targeted at a specific section of the community as suggested by the Respondent. Response from the survey was 30.6% from 1732 houses surveyed.</p> <p>The survey was in two parts, part 1</p>	<p>Clarify statement in Annex 4 for the Purton ~ Planning for the Future that the evidence for housing mix is derived from Purton Parish Housing Needs Survey support by the Parish Plan.</p> <p>None needed</p>

	COMMENT	RESPONSE	NP MODIFICATION
	<p>2.60 The identified bias in the survey respondent type is relevant, because the majority of households in Purton are in fact owner occupied, but this group is wholly under-represented in the survey results. Because of this it is incorrect to infer that the Local Housing Needs Survey is reflective of the wider housing needs of Purton. Furthermore, it has to be remembered that a Local Housing Needs Survey (by definition) does not account for migration, which is a natural feature of a functional housing market area, nor does it provide a detailed projection of future trends. In other words, although the survey is correct to identify a need for affordable housing in Purton, it provides no accurate information regarding the need for larger dwellings. In this context, Core Policy 45 recognises that Local Housing Needs Surveys can provide credible evidence specifically in relation to affordable housing need, the Policy does not recognise such surveys as provided credible evidence regarding the general housing need or the general mix dwelling types / sizes required.</p> <p>2.61 The subsequent implication is that the references to housing mix in Purton Policy 12 are not supported by credible evidence and therefore cannot conform to the requirements of Core Policy 45 of the Wiltshire Core Strategy.</p>	<p>looked at existing households in the Parish whereas part 2 examines households who have identified a need for affordable housing.</p> <p>Of the respondents to the survey 88.3% were owner-occupiers.</p> <p>Of the 34 who indicated their need for affordable housing 85.2% (of 34) either did not want their own homes or had negative equity in their homes.</p> <p>Part 1 identifies the type of homes residents want to see and part 2 identifies the type of affordable homes needed.</p>	
	<p>Purton Policy 13</p> <p>2.62 In view of the concerns regarding Purton Policy 12, it is clear that the draft Neighbourhood Plan has no realistic prospect of meeting the housing needs within the settlement boundary (not least because it makes it harder to deliver development on the in-settlement sites identified). There is some acknowledgement of this at Section 3.5 of the draft Neighbourhood Plan (at page 30). Accordingly, the draft Neighbourhood Plan identifies a site adjoining Restrop Road, which includes all of SHLAA site ref. 470 and part of site ref. 440. This site is illustrated at Map 12 in the draft Neighbourhood Plan (as extracted below).</p>	<p>The Plan in Policy 12 completely recognises that Purton housing needs cannot be met from within the settlement boundary alone and that a site outside the settlement boundary is needed to meet the need.</p>	<p>Review wording of supporting text for Policy 12 to determine if it needs to be clarified</p>

COMMENT	RESPONSE	NP MODIFICATION
<p>Map 12 - Area of Search</p> <p>Date Created: 27-9-2015 Map Centre (Easting/Northing): 408493 / 187460 Scale: 1:8273 © Crown copyright and database right. All rights reserved (100038603) 2015</p> <p>2.63 The draft policy states that;</p> <p>“Land indicated on Map 12 is identified as an area of search for the provision of up to 40 smaller homes including affordable housing, houses for first-time buyers, smaller properties for those who wish to downsize and also properties suited to older persons including bungalows.</p> <ul style="list-style-type: none"> Proposed development should: respect the character and setting of heritage assets in the vicinity of the site including the Grade II* Restrop House and the Scheduled Monument at Ringsbury Camp 		

	COMMENT	RESPONSE	NP MODIFICATION
	<ul style="list-style-type: none"> <i>provide strategic landscaping to the western and southern edges of the site which retains and reinforces existing hedges and trees</i> <i>create a green area adjacent to the Restrop Road so that development is set back from the road</i> <i>not prohibit a potential future road connection to the remainder of the site or road connection to the rear of the Schools and</i> <i>protect and preserve biodiversity on the site.</i> <i>mitigate the impact of traffic with measures to reduce the speed of traffic on Restrop Road where it enters the villages to calm traffic and improve road safety.”</i> <p>2.64 We have a number of concerns with this draft policy. Firstly, the title of the policy is misleading, as it infers that it is applicable to all proposed developments outside of the settlement boundary, when in fact it concerns the possible development of a specific site. Similarly, the draft policy is ambiguous as to its intention. This is to say that it is not at all clear if the policy proposes to allocate a site for development or if it simply identifies a future area of search. As such, it is not apparent how this policy could be used to determine planning applications with any certainty. In turn, there exists a subsequent conflict with Core Policy 2 (Delivery Strategy) of the Core Strategy.</p> <p>2.65 Secondly, the draft policy has already been surpassed by events. This is to say that a full planning application (Ref. 16/10513/FUL) has already been submitted (in November 2016) on part of the site. This application concerns the western part of the land described in draft Purton Policy 13 (and shown in Map 12). The application illustrates the flawed nature of the strategy (as pursued in draft Purton Policy 12, but which links to draft Purton Policy 13) of resisting development outside of the settlement boundary, until all sites within the settlement boundary are developed. Such a sweepingly restrictive policy</p>	<p>Concerning that it appears the title can be seen as misleading and as such Policy 13 can be applied to all sites outside the settlement boundary.</p> <p>The text in Policy 13 is clear in that it applies only to a single site at Restrop Road as identified on Map 12 and to no other site outside the settlement boundary.</p> <p>This is an attempt to link an unrelated document written 9 Dec 2016 (and before the first consultation on the full Plan in 2017) to justify the Respondent’s comments on Policy 13 without understanding the background of</p>	<p>Change the title of Policy 13 to “Development outside settlement boundary at Restrop Road”</p>

	COMMENT	RESPONSE	NP MODIFICATION
	<p>unnecessarily constrains housing delivery, contradicts the PPG (at Paragraph: 001 Reference ID: 50-001-20160519) and demonstrably will not work in practice.</p> <p>2.66 Furthermore, the live planning application on the site illustrates the extent to which draft Purton Policy 13 (and indeed Purton Policy 12) has little regard to matters of viability and the commercial nature of development economics. This is to say that the aspiration of the draft policy i.e. “the provision of up to 40 smaller homes including affordable housing, houses for first-time buyers, smaller properties for those who wish to downsize and also properties suited to older persons including bungalows” is not something that which will realistically be delivered. The consultation response provided by the Neighbourhood Plan Steering Group (in relation to this planning application¹⁰) illustrates the contradiction between the aspirations of draft Purton Policy 12 and market-led development in the real world. Extracts from the consultation comments are noted below;</p> <p>2.67 <i>“Examination of the Master Plan and the Housing Styles reveal that all but one, two-bedroom house includes a study on the first floor next to the bedrooms. It is disingenuous to claim a room as a study when clearly it is, just based on the location, intended as a bedroom. The applicant appears to be claiming these bedrooms as “studies” so they can obtain a higher density of overall dwellings. The “3rd bedroom” will mean potentially more people and therefore cars which will increase the traffic, and will need more garage/parking space;”</i></p> <p><i>This application for 41 houses on a 1.42 ha site, representing a high density development of 29 dwellings per hectare more in keeping with an urban environment than that of a rural village and well above the standard that Wiltshire Council uses...</i></p> <p>2.68 <i>The application adds no functional value to the village (other than more houses) cutting off further access as required in the Neighbourhood Plan. The</i></p>	<p>the document.</p> <p>All 41 dwellings proposed in the application stipulated that one of the bedrooms was a study when clearly it was not. They claimed these were small houses but as such potential understated occupancy levels, the number of garages as required in LPT3 and the level of traffic movements to the main road estimated in their travel plan.</p> <p>The gardens were small, some less than the footprint of the house. Whilst the development at Battlewell (Hills Homes) has tiny gardens it is not next to the very busy Restrop Road. Gardens provide safe places for children to play.</p> <p>It cut off the land behind the site from future development and prevented the potential to provide a road to the rear of the school in future should it be required.</p> <p>Lastly the application stated “it reflects the need and aspirations of the local community” but did not</p>	

	COMMENT	RESPONSE	NP MODIFICATION
	<p><i>Design and Access Statement claims the proposal “reflects the need and aspirations of the local community” and cites the draft Neighbourhood Plan on the site location though ignores the village’s aspiration not just for affordable housing, properties for first time buyers, smaller properties for those wishing to downsize but also properties suitable for older people and which include bungalows (which the developers have been told on at least a couple of occasions would be advantageous to any planning application). These local needs are clearly identified in both the Parish Plan and Policy 12 in Purton’s Draft Neighbourhood Plan. Therefore the application cannot claim it meets the aspirations of the local community at all; and finally...¹¹</i></p> <p>2.69 Whilst we acknowledge the frustration of the Neighbourhood Plan Steering Group, the comments also serve to illustrate a lack of understanding of development economics. For example, the objection to the density of development disregards that fact that increased densities can facilitate the provision of more market dwellings, which in-turn enhances the viability of affordable housing provision. In contrast, draft Purton Policy 13 seeks a relatively low density of development, which likely impedes the possibility of delivering the affordable, smaller and specialist dwellings which the policy also seeks.</p> <p>2.70 Likewise, Purton Policy 13 also suffers from the shortcomings applicable to Purton Policy 12, with respect to the relationship with Core Policies 43 and 45 of the Wiltshire Core Strategy. This is to say that there is a conflict regarding the prioritisation of either affordable housing versus other types of specialist dwelling, as well as the housing mix sought, within the overall context of achieving a financially viable development. In this respect, the policy is not drafted with sufficient clarity to be applied by a decision-maker.</p>	<p>provide evidence to support this assertion. It also cited the support of the Neighbourhood Plan though it took no notice of the criteria in the Plan. The first draft of the Plan was only published a couple of weeks prior to the Application.</p> <p>The letter is a legitimate objection to the proposals in the application, and as such cannot be used to justify a “<i>contradiction between the aspirations of draft Purton Policy 12 and market-led development in the real world.</i>” other than perhaps to miss-represent their proposal to gain planning consent.</p> <p>2.70 is just a reiteration of the points cited previously above. It suggests that by repeating something over and over again will give it more weight!</p> <p>It shows why a Plan is so important to give clear guidance as to what is the need is in Purton. The contradiction comes about by a developer, despite many discussions</p>	

	COMMENT	RESPONSE	NP MODIFICATION
		with the parish council, simply ignoring the needs of the village.	
	<p>2.71 We would urge the Steering Group to revisit this policy (and the draft Neighbourhood Plan's approach to housing more generally) and to think more clearly about the market-led nature of development. For example, we would ask why, in a relatively high land-value location such as Purton, would any developer seek to purchase a plot of land (at great expense) and deliver a site of consisting solely or mostly low-yield dwellings?</p> <p>Likewise, why would a developer progress a site (in strict accordance with draft Purton Policy 13), when the marginal profit is so diminished relative to the risks associated with financing a housing development?</p> <p>2.72 Conversely, we invite the Steering Group to reflect on why any landowner would accept correspondingly low offers for their land (as required to facilitate the delivery of low-yield dwellings), when housebuilders (or similar interests) can offer better values for a predominantly market housing development? In this context, might it make more sense for a landowner to delay the development of their interests until a more favourable policy context arises?</p> <p>2.73 The overarching point is that a meaningful quantum of affordable housing, accommodation for older people, starter homes, etc., will only be delivered where this is facilitated by significant volumes of larger market dwellings, in order to render a scheme viable. If the Neighbourhood Plan is serious about delivering dwellings suitable for a wider cross-section of the community, then it needs to allocate more sites for housing development to enable this.</p> <p>2.74 Overall, and as presently worded, draft Purton Policy 13 cannot be said to be in general conformity with the basic conditions. The policy does not contribute to sustainable development, because it is burdensome and creates viability issues,</p>	<p>The comment is noted but whilst Neighbourhood Planning has to respect and not undermine national and local planning policies, the NPPF gives communities direct power in Neighbourhood Planning to develop a shared vision for their neighbourhood and deliver the sustainable development they need.</p> <p>The argument that development has to be economically viable is well understood and is needed for housing to be built but it is not the purposes of a Neighbourhood Plan to consider only the economic needs of large developers and their profit margins over the needs of the local community/market. Sustainable development is about a balance between economic environmental and social concerns.</p> <p>For example five houses were built at Battlewell overshadowing adjoining rural cottages with prices ranging from £520K to £570K, out of the reach of many in the local</p>	None needed.

	COMMENT	RESPONSE	NP MODIFICATION
	<p>which means it is incapable of delivering its stated objectives of delivering a range of types of accommodation to meet local needs. The policy is ambiguously worded, does not actually allocate land and conflicts with strategic policies of the Wiltshire Core Strategy.</p> <p>We add further that the approach to site selection (which informed both draft Purton Policies 12 and 13) is deeply flawed and not directed at promoting sustainable development. This is explored below.</p>	<p>community whereas the 13 houses built at Smiths Court are more in keeping with the needs of the village and the local community. Both sites were built by the same developer demonstrating that more appropriate housing can be provided than the Respondent is possibly suggesting in 2.71 to 2.74.</p>	
	<p>Site Selection</p> <p>Methodology</p> <p>2.75 We have significant concerns regarding the approach the draft Neighbourhood Plan has taken towards the consideration and evaluation of sites which could potentially be allocated for development.</p> <p>2.76 The underlying concern is that the draft Neighbourhood Plan does not seek to further sustainable development, as defined in the NPPF. Rather, it seeks to advance the invented concept of 'resilience' and applies this term as the basis for its consideration of a site's suitability for development.</p> <p>2.77 It is notable that the methodology employed finds that none of the sites considered actually meet the criteria of resilience as set out at Table 7 of Purton Planning for the Future (2017). We question then on what basis the Neighbourhood Plan seeks to facilitate the development of any site in Purton, given that the 'resilience' criteria applied infers that this should not be the case.</p>	<p>The rankings are to compare the relative merits of all the sites identified in the SHLAA 2012 and draft SHLAA 2015 against one another other and not against a set level.</p> <p>For completeness, the analysis included both sites within the settlement boundary and those outside. However the ranking is used to identify an optimal site outside the settlement boundary to meet the specific housing needs of the village.</p> <p>It is recognised that titles used in the table have caused confusion and the text needs to be clarified.</p>	<p>Remove the wording in Table 7 and the following two paragraphs of Purton ~ Planning for the Future to remove references to Resilience and to clarify that the ranking is to compare sites with one another to identify an optimal for development outside the Settlement Boundary.</p>

	COMMENT	RESPONSE	NP MODIFICATION																																							
	<p>2.78 In addition, with respect the criteria employed to evaluate sites, we would make a number of specific comments. For ease of reference these are set out in tabulated form below;</p> <table><tr><th>Criteria</th><th>Weighting</th><th>Comment</th></tr><tr><td>Within Settlement Boundary</td><td>3</td><td>Recommend deletion: Why does a site’s location within the settlement boundary supposedly make it more sustainable or resilient, particularly when the majority of the other criteria employed are distance or impact based? A settlement boundary is simply a line on a map.</td></tr><tr><td>Distance to shops</td><td>3</td><td>Agree.</td></tr><tr><td>Distance to St Mary Infants and Junior School</td><td>2</td><td>Agree.</td></tr><tr><td>Distance to Bradon Forest Secondary school</td><td>2</td><td>Agree.</td></tr><tr><td>Distance to bus stop</td><td>1</td><td>Agree.</td></tr><tr><td>Distance to surgery</td><td>3</td><td>This is weighted too highly, given use of such facilities is (for most people) relatively infrequent. The weighting should be decreased to 2.</td></tr><tr><td>Distance to dentist</td><td>3</td><td>This is weighted too highly, given use of such facilities is (for most people) infrequent. The weighting should be decreased to 2.</td></tr><tr><td>Distance to chapel</td><td>1</td><td>Agree.</td></tr><tr><td>Distance to church</td><td>1</td><td>Agree.</td></tr><tr><td>Distance to Village Hall & Parish Council</td><td>2</td><td>This is weighted too highly, given the limited frequency with which the majority of residents will visit the Village Hall or Parish Council offices. The weighting should be decreased to 1.</td></tr><tr><td>Distance to the Silver Threads</td><td>1</td><td>Agree.</td></tr><tr><td>Distance to vet</td><td>1</td><td>Agree.</td></tr></table>	Criteria	Weighting	Comment	Within Settlement Boundary	3	Recommend deletion: Why does a site’s location within the settlement boundary supposedly make it more sustainable or resilient, particularly when the majority of the other criteria employed are distance or impact based? A settlement boundary is simply a line on a map.	Distance to shops	3	Agree.	Distance to St Mary Infants and Junior School	2	Agree.	Distance to Bradon Forest Secondary school	2	Agree.	Distance to bus stop	1	Agree.	Distance to surgery	3	This is weighted too highly, given use of such facilities is (for most people) relatively infrequent. The weighting should be decreased to 2.	Distance to dentist	3	This is weighted too highly, given use of such facilities is (for most people) infrequent. The weighting should be decreased to 2.	Distance to chapel	1	Agree.	Distance to church	1	Agree.	Distance to Village Hall & Parish Council	2	This is weighted too highly, given the limited frequency with which the majority of residents will visit the Village Hall or Parish Council offices. The weighting should be decreased to 1.	Distance to the Silver Threads	1	Agree.	Distance to vet	1	Agree.	<p>Comments noted and:</p> <p>It is agreed that whether a site is within or outside the settlement boundary does not in itself make the site more or less resilient or sustainable and so consider it can be deleted.</p> <p>However the settlement boundary is based on years of planning and functional association with the village. As a proxy, a “settlement boundary” contains a store of sustainable development thinking.</p> <p>The weighting of criteria is not based on distance but more on frequency and the importance of the criteria to residents. Health and is view by residents as very important and should remain unchanged though as frequency of visits to dentists (and generally not life threatening) can be reduced to 2.</p> <p>Village Halls are considered an important feature of village life and provide a focus for much of village life. As such the weighting is to remain unchanged.</p>	<p>Delete the weighting (Criteria) for “Within the Settlement Boundary” in the analysis of sites in Appendix 8 in Purton ~ Planning for the Future.</p> <p>Other than these two, the rest of weightings to stay as is apart from Dentists which is to be reduced down to 2 from 3.</p> <p>Change the wording for “Potential to impact view” to “Potential to impact sensitive and distinctive skylines and views.”</p> <p>Change the wording for Heritage to “Potential to adversely affect the character or setting of heritage assets”.</p>
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COMMENT			RESPONSE	NP MODIFICATION
Distance to library	1	Agree.	<p>Comment noted about views, heritage sites and designated conservation sites.</p> <p>In a rural environment, the local fauna and flora are considered important to residents. However it is arrogant to assume that this can only be assessed by on-site surveys conducted only by professionals. Local residents, many who have lived in the village all their life, will have amassed considerable knowledge of the sites/ fields that surrounds the village.</p> <p>Should also note that residents have a wider view on what is important rather than just protected species.</p> <p>Agreed that potential added value is a subjective assessment though it largely comes from residents' views of the respective sites.</p> <p>Notably the Taylor Review (2008) argued that planning must not ... assess communities as they are now, rather what they could be and we should be asking: <i>...will this</i></p>	<p>Delete the criterion "Potential added value" and replace be a new criterion "Community Enhancements" based on the principles outlined in the Taylor Review (2008).</p>
Distance to The Village Centre (Red House, etc.)	2	Agree.		
Distance to The Angel	1	Agree.		
Distance to The Royal George	1	Agree.		
Proximity to allotments	1	Agree.		
Potential flooding	3	Agree.		
Potential to impact view	3	Specific reference should be made to an impact being detrimental. Affecting a view (i.e. from a dwelling) does not mean that it is harmful and loss of a view is not a material consideration.		
Potential to affect character or settings of any listed building or heritage assets	3	This should be revised such that it refers to the potential adversely affect the character or settings of such heritage assets.		
Good access	3	Agree.		
Within, or in close proximity to, a designated conservation site (e.g. SSSI, CWS ...)	3	This should be amended, as proximity to a designated conservation site does not mean that the biodiversity value of that site would be adversely affected by nearby development.		
Known, or likely, to have badgers, great-crested newts, bats or deer	3	Recommend deletion of this criteria as this can only be effectively assessed with on-site surveys, as part of a planning application.		
Potential added value (reduce traffic congestion, parking on roads ...)	3	Recommend deletion of this criterion, as it is highly subjective when compared to most other criteria which are distance-based or can be evaluated in a relatively objective manner.		

	COMMENT	RESPONSE	NP MODIFICATION
	<p><i>Comments on Site Evaluation Criteria</i></p> <p>2.79 To elaborate further on the table above, we would first clarify that considerations of a site's sustainability should be blind to its location within or outside of a settlement boundary. A settlement boundary is not a measure of sustainability, but rather a line on a map. To treat it as a constraint is to disregard the requirement to promote sustainable development, as necessary under Section 39 of the Planning and Compulsory Purchase Act (2004).</p> <p>2.80 With respect to access to services, consideration should be given to the frequency with which people will likely access them. Most residents will access local shops on a relatively frequent basis. However, the majority will engage the services of a doctor or dentist relatively infrequently. The same could also be said regarding the criteria relating to proximity to the Parish Council offices and Village Hall, as most residents will visit these occasionally, if at all.</p> <p>2.81 In considering the ecology related criteria, we agree that if a site falls within such a designation then this likely constitutes a constraint. However, we note that proximity to a local nature designation does not actually mean that development would be detrimental to it. Likewise, it is inconsistent to evaluate a site's suitability for allocation on the basis of a site being 'known, or likely, to have badgers, great-crested newts, bats or deer'. The presence of such species does not automatically preclude development and development proposals often actually facilitate biodiversity enhancements as part of a comprehensive scheme, though the provision of green infrastructure (noting also, and for example, that agricultural fields are typically lacking in bio-diversity). Likewise the occasional presence of such species does not infer that a site is used for breeding or integral to foraging behaviour. The underlying point is that ecological constraints can only be assessed through on-site surveys (conducted by professionals), which typically take place before a planning application is being submitted.</p>	<p><i>development enhance or decrease the sustainability of this community – balancing social, economic and environmental concerns?</i></p> <p>Interestingly, the Taylor Review also noted that there is "...the requirement for the planning system to shake off a narrow approach to what we mean by sustainable (which often undermines longer-term sustainability) so that planning can help deliver a genuinely more sustainable, living, working countryside."</p> <p><i>Purton ~ Planning for the Future</i> recognises this imperative and does just that and considers a range of potential housing and business locations and assesses them for their true potential and constraints against many social, economic and environmental criteria. In particular, it asks ...will this development enhance or decrease the sustainability of this community – balancing social, economic and environmental concerns by looking at the</p>	

	COMMENT	RESPONSE	NP MODIFICATION
	<p>2.82 As such, this cannot be considered to constitute a robust or appropriate criterion for assessment. Indeed, it potentially restricts opportunity for bio-diversity enhancement, which might be achieved through the development of particular sites. In this respect, we refer back to the three dimensions of sustainable development specified in the NPPF, noting that the environment role requires planning to contribute to “protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity”. Accordingly it should be deleted.</p> <p>2.83 Finally, we would remark that the invented notion of ‘added value’ is entirely subjective and nebulous. It does not relate to any measurable feature, nor is it at all transparent. From the table above it appears to be something to do with reducing traffic congestion or parking on roads. But surely added value includes the provision of affordable housing, new public open space, etc.? The category is very poorly defined, ambiguous and it is not clear how it promotes sustainable development. It should be deleted.</p>	<p>Community Enhancement that a potential location could bring in terms of social inclusion (by proximity to services and facilities) economic growth (by ease of links to work) and environmental enhancement (not creating additional parking on roads for instance, not creating additional congestion, not fragmenting known biodiversity and habitats and so on).</p>	
	<p>Evaluation of Land North of Pavenhill, Purton</p> <p>2.84 Our client has a particular interest in this site. As such, we provide a critical evaluation of the Neighbourhood Plan’s assessment of its suitability for development.</p> <p>2.85 Firstly, we draw the Steering Group’s attention to the evaluation within the Wiltshire Strategic Housing Land Availability Assessment (SHLAA) 2012. This document identifies the site as being potentially suitable for residential development. If the site was unsustainable it would not have been viewed favourably.</p> <p>2.86 We also make the comment that the Neighbourhood Plan Steering Group is aware of the fact that Planning Application Ref. 16/03625/FUL was supported by a</p>	<p>Whilst the individual sites are assessed in Purton ~ Planning for the Future, it is not the purpose of this document or the Plan to address the specifics merits or otherwise of a particular planning application. However as it has been raised:</p> <p>The inclusion of a site in Wiltshire SHLAA only identifies that a site is available for development and that</p>	<p>The reasons put forward to change the scoring of this site are erroneous so there is no reason to change the original scoring for this site</p> <p>None needed <i>(the final score will</i></p>

	COMMENT	RESPONSE	NP MODIFICATION
	<p>number of detailed on-site ecological surveys, conducted by independent professional ecologists, which confirm that the site is not constrained by the presence of protected species. In view of this information (which has been considered and accepted by Wiltshire Council's Biodiversity Officers) it is disingenuous for Purton Planning for the Future to score the site poorly on the basis that it is "known, or likely, to have badgers, great-crested newts, bats or deer".</p> <p>2.87 Further, the Neighbourhood Plan Steering Group is also aware of the fact that safe vehicular and pedestrian accesses can be achieved through the development of the site. This was confirmed by Wiltshire Council in their evaluation of the aforementioned planning application.</p> <p>2.88 In addition, we provide overleaf a revised assessment of the site's suitability for development. This is based on an adapted version of the methodology employed in Purton Planning for the Future.</p> <p>2.89 The output score from this revised assessment is 4.24, which pushes the site into the category 'marginal', which means that it is suitable for allocation in accordance with the rationale of the draft Plan, as elaborated in Purton Planning for the Future (bearing in mind that none of the sites assessed in that document are categorised as falling within the higher 'resilient' category).</p>	<p>it is deliverable but not as to whether a site is sustainable.</p> <p>Ecology report found evidence of badgers using the site for foraging, pipistrelle bat confirmed and a good population of slow worms. WC requires (if approved) 'protection of semi-natural habitats and priority/protected species including slow worm, breeding birds, badger and brown hairstreak'.</p> <p>Residents have noted the presence of Deer, Badgers, Kestrel, Buzzard and Kites and bats (which can be seen there every evening in their season).</p> <p>Development of the site itself does not necessitate necessarily safe access. If so a traffic calming speed table which will increase traffic noise would not be required is proposed. The developer has not provided evidence that the proposed advisory on road footpath for pedestrians on a narrow road with heavy traffic at peak hours is safe and the interconnecting footpath 110 is not suitable for</p>	<p><i>change due to the change in weightings suggested previously but it will affect all sites and so has little impact on the overall relative ranking).</i></p>

	COMMENT	RESPONSE	NP MODIFICATION												
		<p>disabled access.</p> <p>The distance from eastern end of the site via footpath 110 to Pavenhill shops is 492 metres, as measured from OS GIS, which is greater than 400m defined by CIHT guidelines for “Providing Journeys on Foot” to Shops. For residents at the western edge add a further 200 metres approx. An issue, however, is how many residents would feel safe using the on-road footpath along a very narrow road. The scoring to remain unchanged.</p> <p>The bus stop in Restrop View is no longer in use as APML Travel has gone into liquidation February 2017. There does not appear there will be a replacement service from here. The nearest bus stop is at Restrop Road. The scoring to remain unchanged.</p>													
	<table><tr><th>Criteria</th><th>Draft NP Initial Score</th><th>Revised Score</th><th>Revised Weighting</th><th>Overall Revised</th><th>Comment</th></tr><tr><td>Within Settlement Boundary</td><td>-</td><td>-</td><td>-</td><td>-</td><td>Deleted</td></tr></table>			Criteria	Draft NP Initial Score	Revised Score	Revised Weighting	Overall Revised	Comment	Within Settlement Boundary	-	-	-	-	Deleted
Criteria	Draft NP Initial Score	Revised Score	Revised Weighting	Overall Revised	Comment										
Within Settlement Boundary	-	-	-	-	Deleted										

COMMENT						RESPONSE	NP MODIFICATION
Distance to shops	2	3	3	9		The development of Pavenhill would provide a pedestrian connection to the public footpath at the eastern extent of the site. This footpath would be improved as part of the development. This is the route which would be used by future residents to access local shops. The distance is therefore less than 400m.	
Distance to St Mary Infants and Junior School	2	2	2	4		Agree.	
Distance to Bradon Forest Secondary school	2	2	2	4		Agree.	
Distance to bus Stop	2	3	2	6		We note the nearest bus stop to Pavenhill is Restrop View (approximately 150 meters from the site), so we increase the proximity-based score to 3.	
Distance to surgery	2	2	2	4		As noted, the weight applied to this category has been reduced to 2.	
Distance to dentist	1	1	2	2		As noted, the weight applied to this category has been reduced to 2.	
Distance to chapel	1	1	1	1		Agree.	
Distance to church	1	1	1	1		Agree.	
Distance to Village Hall & Parish Council	1	1	1	1		As noted, the weight applied to this category has been reduced to 1	
Distance to the Silver Threads	1	1	1	1		Agree.	
Distance to vet	1	1	1	1		Agree.	
Distance to library	1	1	1	1		Agree.	
Distance to The Village Centre (Red House, etc.)	1	1	2	2		Agree.	
Distance to The Angel	1	1	1	1		Agree.	
Distance to The Royal George	3	3	1	3		Agree.	
Proximity to allotments	3	3	1	3		Agree.	
Potential flooding	3	3	3	9		Agree.	
Potential to impact view	3	3	3	9		Agree - subject to suggested rewording of the criteria.	

	COMMENT					RESPONSE	NP MODIFICATION
	Potential to affect character or setting of any listed building or heritage assets	3	3	3	9	Agree - subject to suggested rewording of the criteria.	
	Good access	1	3	3	9	Safe vehicular and pedestrian accesses are entirely achievable, as has been confirmed by Wiltshire County Council in their assessment of planning application Ref. 16/03625/FUL. Accordingly the score has been revised upward to 3.	
	Within, or in close proximity to, a designated conservation site (e.g. SSSI, CWS ...)	3	3	3	9	Agree - subject to suggested rewording of the criteria.	
	Known, or likely, to have badgers, great-crested newts, bats or deer	-	-	-		Deleted.	
	Potential added value (reduce traffic congestion, parking on roads ...)	-	-	-		Deleted.	
	Total Score and Average				89	Revised Average Score 4.24	
	Sustainable Development on land at Pavenhill, Purton						
	<p>2.90 As set out below, it is considered that the proposals on land at Pavenhill represent sustainable development when tested against the three dimensions of sustainable development, as identified by the Framework at Paragraph 7 and summarised below:</p> <p>Economic</p> <ul style="list-style-type: none"> House building is recognised as an important driver of economic growth. The proposals will provide for the creation of direct and indirect jobs 					<p>Comment is noted however this will apply to any of the other sites irrespective of where they are located around the village.</p> <p>The Plan does not argue against development or the three dimensions sets out in the NPPF but only that Pavenhill Planning Application is the wrong site with</p>	None needed

	COMMENT	RESPONSE	NP MODIFICATION
	<p>associated with construction.</p> <ul style="list-style-type: none"> In the longer term, the level of disposable income in the local area will also be increased with some commensurate growth in the demand for goods and services. As a consequence of the proposed development, the LPA will qualify for a substantial New Homes Bonus payment, facilitating the provision of services. <p>Social</p> <ul style="list-style-type: none"> The development of the site will bring benefits in terms of additional housing to meet overall housing requirement. The site will also deliver a significant amount of affordable housing (40%) to meet the needs of present and future generations. New facilities and infrastructure will be provided in the local area through the CIL payment and S106 contributions which will have social benefits for the local rural community. The development of additional housing in Purton will help to sustain the vitality of the settlement and the viability of existing services and facilities. <p>Environmental</p> <ul style="list-style-type: none"> The site is within walking and cycling distance of key local facilities, and is accessible (via public transport) to other settlements which have a more extensive range of facilities and services. The development of the site would represent an appropriate addition to Purton. The site is very well contained by vegetation and existing development, 	<p>the wrong type and mix of housing and thus does meet the local needs for Purton.</p> <p>The site is outside the settlement boundary of Purton, included the proposed revision in Wiltshire's Housing Site Allocation Plan which is currently out for consultation, and the development is contrary to Core Policy 1 of the Wiltshire Core Strategy (paragraph 4.15). Relaxation of the boundaries will only be supported where it has been formally reviewed through a subsequent DPD or a community-led neighbourhood plan.</p> <p>Though the site itself does not have any heritage impact, the traffic calming proposed will impact adversely the setting of the Grade II South Pavenhill Farmhouse.</p> <p>The site exits onto a narrow and heavily-used road with no footpath and the safety of an on-road footpath is highly questionable and not supported by evidence.</p> <p>The type of housing proposed does</p>	

	COMMENT	RESPONSE	NP MODIFICATION
	<p>and has a close relationship with the existing settlement edge.</p> <ul style="list-style-type: none"> The development of land at Pavenhill could include the creation of new areas of landscape and open space including new habitats that will provide for significant biodiversity benefits. <p>2.91 Accordingly, the proposal will result in a sustainable development that achieves the three sustainability dimensions set out in the NPPF. There are no adverse impacts of the development that would significantly and demonstrably outweigh the substantial benefits of the proposal.</p>	<p>not meet with the Plan's objective for affordable housing, properties for first time buyers, smaller properties for those wishing to downsize and properties suitable for older people including bungalows as identified in the Parish Plan 2014 and Purton Housing Needs Survey January 2012</p> <p>Whilst local facilities are reasonably accessible, decline in bus services means residents have to rely on the car to access the larger retail and service centres.</p> <p>While it could include creation of new areas and open spaces for new habitats, the existing plans do not.</p> <p>Ranking of the sites outside the settlement boundary shows there are better and more sustainable sites than the Land North of Pavenhill.</p>	
	<p>3. Conclusions</p> <p>Conformity with Basic Conditions</p> <p>3.1 Having set out the above specific policy objections, we therefore assess the Plan against the "basic conditions" (see paragraph 8(2) of Schedule 4B to the TCPA</p>		

	COMMENT	RESPONSE	NP MODIFICATION
	<p>1990).</p> <p>8(2)(d) The making of the neighbourhood plan contributes to the achievement of sustainable development</p> <p>3.2 A draft Neighbourhood Plan only meets the basic conditions if, inter alia, “the making of the Plan contributes to the achievement of sustainable development”, see paragraph 8(2) (d) of Schedule 4B TCPA 1990.</p> <p>3.3 As explained, the presumption in favour of sustainable development is the “golden thread” that runs through the whole of national planning policy. This is manifested particularly in paragraph 14 of the NPPF and paragraph 16 of the Framework make its absolutely clear that; <i>“The application of the presumption [in favour of sustainable development] will have implications for how communities engage in neighbourhood planning. Critically, it will mean that neighbourhoods should develop plans that support the strategic development needs set out in Local Plans, including policies for housing and economic development.”</i></p> <p>3.4 In contrast, the draft Neighbourhood Plan, via its supporting evidence base report, Purton Planning for the Future (2017) denounces the concept of sustainable development. This is a somewhat discouraging starting point for the draft Plan. Indeed, in view of the absolute centrality of this concept to the planning system, this is an untenable and misguided approach.</p> <p>3.5 That the key supporting document to the draft Plan explicitly disregards the key notion of sustainable development and associated statutory requirement to promote it, has a profound and undermining influence of the rest of the Plan. This occurs because it provides a ‘green-light’ to depart for other key aspects of national policy and guidance, and encourages draft policies that contradict the strategic policies of the adopted Wiltshire Core Strategy.</p> <p>3.6 Instead of promoting sustainable development, the Neighbourhood Plan</p>	<p>3.1 and 3.2 noted and response is as in 2.4 to 2.7 above.</p> <p>Noted as in 2.8 to 2.12 above, acknowledge the use of the term Resilience in Purton ~ Planning for the Future can lead to confusion and needs review.</p> <p>A derogatory assumption that the use of the term Resilience provides a green-light for the Plan to depart for aspects of national policy and guidance which is just not true.</p> <p>As previously indicated, resilience is</p>	<p>As for 2.8 to 2.12 listed above.</p> <p>None needed.</p>

	COMMENT	RESPONSE	NP MODIFICATION
	<p>seeks to advance an invented concept, 'resilience'. This leads it to ignore (for example) the role of viability as a key element within the dimensions of sustainable development as advanced through the NPPF. This results in for formulation of draft policies which are contradictory, burdensome and which will act to hinder development, undermining (for example) the draft Plan's aspirations to deliver affordable housing and other forms of specialist accommodation. In this respect the Plan cannot be said to contribute effectively to the promotion of the social element of sustainable development.</p> <p>3.7 Another concern is that the criteria used to evaluate potential sites for development disregards the requirement to contribute to the environmental dimension of sustainable development. For example, a criterion in the site assessment methodology attaches a lower score to sites outside of the settlement boundary, but this is not a proxy of either sustainability or indeed 'resilience' (being the alternative concept that the draft Neighbourhood Plan seeks to further). Similarly, the methodology attaches a lower score to sites which are "known, or likely, to have badgers, great-crested newts, bats or deer" (based on supposed local knowledge) and at the same time indicates that such constraints can only be evaluated with additional surveys prepared in accordance with "appropriate protocols". Furthermore, the draft Plan and evidence base ignores the potential to secure bio-diversity enhancements from developments.</p> <p>3.8 A related but separate point is that it is not clear if the draft Neighbourhood Plan is actually proposing to make any housing allocations. Purton Policy 12 identifies a number of sites within the Settlement Boundary, which could already be developed in accordance with Core Policies 1 and 2 of the Wiltshire Core Strategy. So these cannot be regarded as allocations. Indeed, in seeking to apply additional localised requirements (regarding housing mix and affordable housing, which contradict local and national policies), the draft Policy makes it less likely that sustainable development within the Purton Settlement Boundary will take</p>	<p>part of UK Government thinking</p> <p>Noted as in 2.78 above which agrees that the Criteria with regard to the settlement boundary should be removed from the analysis in Annex 7 of Purton Planning for the Future.</p> <p>It is right to attach lower scores when assessing sites where there is known wildlife which has importance to the village. It should be noted that planning application 16/03625/FUL did not propose any biodiversity enhancements.</p> <p>View noted but Policy 12 does not undermine sustainable development as suggested.</p>	<p>Action as identified for 2.78 above.</p> <p>None needed</p>

	COMMENT	RESPONSE	NP MODIFICATION
	<p>place, when compared to the current policy context (i.e. with applications for development within the settlement boundary be determined under Core Policy 2 of the Core Strategy). This cannot be regarded as furthering the achievement of sustainable development.</p> <p>3.9 Similarly, the title of Purton Policy 13 appears to describe a general development management policy. However, the text to it identifies a specific 'area of search' outside of the settlement boundary, but it is not clear whether it actually allocates the land for development. There is a marked ambiguity in the wording of the draft policies, which contradicts the guidance set out in the PPG (at paragraph 041 Reference ID: 41-041-20140306) and which further means it is difficult to properly understand the draft Plan's implications regarding sustainability.</p> <p>3.10 Most concerningly, the draft Neighbourhood Plan does not seek to meet the objectively assessed housing need arising in the area over the Core Strategy Plan period (i.e. to 2026). Rather, the draft Neighbourhood Plan's housing policies are based on a separate (and flawed) projection of population growth and housing requirements for Purton (to 2026). To attempt to prepare a Neighbourhood Plan upon the foundation of alternative population projections, places the draft Plan's housing policies in conflict with Core Policy 2 of the Wiltshire Core Strategy, and the OAN figure upon which the Development Plan is based. Likewise, this approach is contrary to the policy approach set out in the NPPF (paragraphs 16, 17(3), 47, 49, 184) and PPG paragraphs 040 Reference ID 41-040-20160211 and 009 Reference ID: 41-009-20160211. Such conflicts means that draft Purton Policies 12 and 13 cannot be regarded as contributing to the achievement of sustainable development</p>	<p>The site identified in Policy 13 has the potential for 80 houses whereas only 40 are designated, hence the designation of the site but redefine the site to remove any ambiguity.</p> <p>The Core Strategy disaggregated housing numbers down to the Principal Settlements, Markets Towns and Local Service Centres. It does not identify the number at Large or Small villages hence the need to identify separately the number of houses for Purton (i.e. population growth). Thus Plan does not conflict with Core Policy 2 nor the housing numbers defined in Wiltshire's Housing Land Supply Statement.</p>	<p>In Policy 13 change <i>"area of search"</i> to <i>"an area to accommodate a site for up to 40 house ...etc"</i></p> <p>None needed</p>
	<p>8(2)(a) Having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the neighbourhood plan</p> <p>3.11 A draft Neighbourhood Plan only meets the basic conditions if, inter alia,</p>		

	COMMENT	RESPONSE	NP MODIFICATION
	<p>“having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the order”: paragraph 8(2)(a) of Schedule 4B TCPA 1990.</p> <p>3.12 In order to have regard to a policy, as a matter of law, that policy has to be interpreted properly by the decision maker. A decision maker who misinterprets policy does not have regard to it and errs in law: see EC Gransden v Secretary of State (1987) 54 P. & C.R. 86, as renewed in Tesco Stores Ltd v Dundee City Council [2012] PTSR 983.</p> <p>3.13 The PPG, at paragraph 009 Reference ID: 41-009-20160211, confirms that Neighbourhood Development Plans have to have regard to the latest and up-to-date evidence relating to housing need. The Steering Group will be aware of the current consultation on the draft Wiltshire Site Allocations Plan and the planned review of the Core Strategy. In this context, we would urge Wiltshire Council to deliver on its obligations (at PPG 009 Reference ID: 41-009-20160211) and share, with the Neighbourhood Plan Steering Group, the evidence set out within the Joint Wiltshire-Swindon SHMA. Taking account of this evidence, the draft Neighbourhood Plan shall need to be revised substantially, in order to ensure it provides appropriate flexibility to accommodate the additional growth which is likely to be required as a result.</p> <p>3.14 Proposed Purton Policies 12 and 13 also place additional obligations on developers (some of which conflict with the PPG at Paragraph: 031 Reference ID: 23b-031-20161116), yet the additional obligations envisaged in these policies are not supported by any robust assessment of viability. Indeed, the draft Neighbourhood Plan gives little consideration to the relationship between viability and deliverability in general. Aside from rendering these policies ineffective, the paucity of analysis and understanding of development economics means that the draft document is contrary to the PPG, at Paragraph: 005 Reference ID: 10-005-</p>	<p>The draft Wiltshire Site Allocation Plans June 2017 allocates new sites for development (Chippenham) and to review Settlement Boundaries.</p> <p>Topic Paper 3 Housing Land Supply (page 8) states that the residual indicative requirement 2017 for Royal Wootton Bassett and Cricklade CA remainder is zero (0). This excludes any development West of Swindon. Thus the Plan is in accordance with the Core Strategy and the draft Wiltshire Site Allocations Plan June 2017.</p> <p>In regard the Joint Wiltshire Swindon SHMA has yet to be published (expected autumn) and thus the effect on Purton at this stage is unknown, see 2.15 to 2.18 above.</p> <p>There is no conflict between Policies 12 and 13 and Paragraph 031 Reference ID 23 b-031-</p>	<p>None needed</p> <p>None needed</p>

	COMMENT	RESPONSE	NP MODIFICATION
	<p>20140306, and ignores the fact that achieving sustainable development (as defined in the Framework) includes making development viable, as per the NPPF at paragraph 173.</p> <p>3.15 A further concern is that the wording and composition of draft Purton Policies 12 and 13 is ambiguous and contradictory. This is to say that a Planning Officer, when attempting to consider these policies in respect of the determination of a planning application, would not be in a position to apply them with confidence. This places the Local Planning Authority at risk of Section 78 Planning Appeals and potential High Court challenges.</p>	<p>20161116, i.e. contributions should not be sought from developments of 10 units or less, see response to 2.52 above</p> <p>This has been dealt with above</p>	<p>Actions as above</p>
	<p>8(2)(e) The making of the neighbourhood plan is in general conformity with the strategic policies contained in the development plan for the area</p> <p>3.16 In a number of respects the draft Neighbourhood Plan is in conflict the strategic policies of the adopted Wiltshire Core Strategy. This is relevant because the PPG at paragraph: 044 Reference ID: 41-044-20160519 states that;</p> <p><i>“The resulting draft neighbourhood plan must meet the basic conditions if it is to proceed. National planning policy states that it should support the strategic development needs set out in the Local Plan, plan positively to support local development and should not promote less development than set out in the Local Plan or undermine its strategic policies (see paragraph 16 and paragraph 184 of the National Planning Policy Framework).”</i></p> <p>3.17 In other words, both national planning policy and the Secretary of State’s guidance advise that Neighbourhood Plans have to be consistent with and not in conflict with the provision of housing to meet objectively assessed evidence of need. The Wiltshire Core Strategy sets out the housing requirement for the County to be delivered by 2026, as derived from the analysis contained within Wiltshire</p>	<p>The Plan does positively support local development by identifying an additional site to meet Purton’s housing.</p> <p>The Core Strategy disaggregated housing numbers down to the Principal Settlements, Markets Towns and Local Service Centres. It does not identify the number at</p>	

	COMMENT	RESPONSE	NP MODIFICATION
	<p>SHMA (2012). This is subsequently disaggregated in accordance with the Core Strategy spatial strategy.</p> <p>3.18 As such, it is inappropriate for the Neighbourhood Plan to be based on independent projections (as prepared by a member of the Steering Group), which separately forecast population growth and housing requirements for Purton (to 2026 - i.e. concurrent with the Core Strategy period), but which are simplistic and which lack the nuanced understanding of a professionally produced evaluation. It is important to remember that the Neighbourhood Plan (once made) will form part of the Development Plan. A Development Plan cannot be based on multiple conflicting projections of population growth and housing requirements, it has to be based on an objectively assessed need (OAN), which is derived from a robust assessment, as carried out through the preparation of a SHMA.</p> <p>3.19 For the Neighbourhood Plan to attempt to advance a separate housing requirement (to 2026) is in effect to attempt to ring-fence Purton and circumvent the spatial and delivery strategy as set out in the Wiltshire Core Strategy at Core Policies 1 and 2. Furthermore, in view of the preparation of the Joint Wiltshire - Swindon SHMA and the scheduled Local Plan Review (and in the context of the PPG at paragraphs 040 ref id 41-040-20160211 and 009 Reference ID: 41-009-20160211) we draw the Steering Group's attention the Court of Appeal ruling in the recent case R(DLA Delivery) v Lewes DC ([2017] EWCA Civ 58);</p> <p><i>"If a neighbourhood development plan has been made and the local planning authority later produces a development plan document containing new "strategic policies", that development plan document will, under section 38(5) of the 2004 Act, prevail over any inconsistent policies in the neighbourhood development plan. And if a policy in a neighbourhood development plan is not, or ceases to be, up-to-date, this will be a material consideration in a development control decision, and may justify departing from that policy."</i></p>	<p>Large or Small villages hence the need to identify separately the number of houses for Purton (i.e. population growth). Thus Plan does not conflict with Core Policy 2 and housing numbers defined in Wiltshire's Housing Land Supply Statement.</p> <p>Noted</p>	

	COMMENT	RESPONSE	NP MODIFICATION
	<p>3.20 We have also noted that both draft Purton Policies 12 and 13 conflict with other strategic policies in the adopted Core Strategy. The ambiguity of the each of these draft policies creates the potential for conflict with Core Policy 43 and therefore risks impeding the delivery of affordable dwellings. Similarly, the conflict with Core Policy 45 means that the mix of housing envisaged in the draft Neighbourhood Plan is incompatible with the mix sought through the Core Strategy, which is based on the SHMA (2012). Indeed, for the reasons explained previously, the Neighbourhood Plan and associated documents do not provide robust evidence to supersede the SHMA derived housing mix. The effect will be to frustrate the Neighbourhood Plan's aspirations and also deprive those responsible for determining planning applications of the clarity and confidence to make robust decisions.</p>	<p>Noted as in 2.51 to 2.55 above, policies 12 and 13 do not conflict with Core policies 43 and 45.</p>	<p>Actions as defined above for 2.51 to 2.55</p>
	<p>Concluding Remarks</p> <p>3.21 As currently configured the draft Neighbourhood Plan does not meet the basic conditions, as set out in paragraph 8(2) of Schedule 4B to the TCPA 1990. The draft Plan does not contribute to the achievement of sustainable development. Indeed, it sets out to denounce and subvert this key concept which is integral to the planning system. The draft Plan fails to have regard for national policies and guidance, and is in conflict with a number of strategic policies within the adopted Wiltshire Core Strategy.</p> <p>3.22 The draft Plan is fundamentally flawed and should the Neighbourhood Plan Group seek to submit the Plan, the Local Planning Authority would not be able to accept it and it must be rejected. Accordingly, we recommend strongly that the Plan does not proceed further, until such time as it has been comprehensively revised and redrafted. In this respect, we would urge the Neighbourhood Plan Steering Group to concentrate on preparing a Plan within the scope and parameters of the existing planning system.</p>	<p>Respondent's views noted and the individual points raised have been dealt with above.</p>	<p>No further action is needed as they have been addressed above</p>

	COMMENT	RESPONSE	NP MODIFICATION
	<p>Appendix 1: Previous Representations to the Neighbourhood Plan</p> <p>16.12.2014 By email Parish Clerk, Purton Parish Council Office, Village Hall, Purton, SN5 4AJ</p> <p>Dear Chairman,</p> <p>NEIGHBOURHOOD PLAN CONSULTATION - LAND AT UPPER PAVENHILL, PURTON</p> <p>Introduction</p> <p>The following document has been prepared by Turley on behalf of Hills Homes Developments Ltd, who control land at Upper Pavenhill. The document promotes the allocation of this land for small-scale residential development, within the emerging North East Wiltshire Villages (NEW-V) Neighbourhood Plan. Whilst we understand that the Parish Council and Neighbourhood Plan Team will wish to comply with the legal obligation to undertake a formal 'call for sites' (as noted by Planning Practice Guidance (PPG) 048), we wish to take this opportunity to highlight the potential for development on land at Upper Pavenhill.</p> <p>We include, at Appendix 1, an accompanying Location Plan which clearly identifies the site.</p> <p>The remainder of this letter outlines the context of the site, the need for development in Purton as well as the suitability of the site to accommodate a sensitive and high quality residential development.</p> <p>Site Location and Context</p> <p>The site, which is located 3km west of Swindon, comprises approximately 1.5 hectares of land, currently in (low value) agricultural use and which is cut for silage several times a year. The site is bounded by existing residential areas on its</p>	<p>Confirmed the letter was received by the Parish Council and discussed with the developer. As the site in the SHLAA 2012, it was automatically included in the analysis and ranking of all the sites, both inside and outside the settlement boundary of Purton.</p>	<p>None needed</p>

	COMMENT	RESPONSE	NP MODIFICATION
	<p>western, southern and eastern boundary. To the north the site abuts an area of allotments. The site is bordered by a mix of vegetation, hedgerows and fencing, and is currently accessed from the south via Pavenhill.</p> <p>Site Suitability</p> <p>The principle of development in Purton, and the appropriateness and need for development in this settlement, is established in emerging planning policy. This is noted in the Wiltshire Core Strategy PreSubmission Document which identifies Purton as a Large Village. Core Policy 1 supports development at Large Villages where this helps to meet the housing need of settlements and helps to sustain employment opportunities, services and facilities.</p> <p>In this regard, we suggest that there is an urgent need for Purton to accommodate sustainable and appropriately designed residential developments, in order to support the long-term viability of the village, including its primary school, library, village store, post office facility, pubs and other amenities. In this regard, we welcome the decision to prepare a neighbourhood plan as a positive and proactive step, towards planning for good quality development.</p> <p>With respect to the specific suitability of the site at Upper Pavenhill, we submit that development at this location would benefit from excellent access to local facilities and amenities within Purton. Further, the site is situated approximately 150m west of the Restrop View and Royal George Bus Stops ensuring excellent connectivity by public transport to Swindon and the extensive services and facilities available there.</p> <p>The site is well contained by existing residential dwellings which border the site on three sides. As such, residential development would effectively constitute in-fill development, and will provide a natural and logical continuation of the housing in this part of the village.</p>		

	COMMENT	RESPONSE	NP MODIFICATION
	<p>The suitability of the site is further reinforced by the Wiltshire Council SHLAA (2012). The SHLAA assessed the site (Ref. 436) favourably and did not identify the site as being subject to significant constraints. This assessment supports the view that the site is an appropriate location for sustainable residential development. This further establishes the principle of residential development.</p> <p>In addition, we have commissioned a series of supporting assessments and studies which demonstrate the site's suitability for residential development. These reports include highways and access studies, flood risk and drainage studies and an ecological appraisal. These documents indicate that the site at Upper Pavenhill is not subject to any significant constraints. Further, they indicate that a carefully designed scheme would enhance the local area, without creating significant material impacts on neighbouring properties.</p> <p>Design</p> <p>Residential development at the site should aspire to the highest standards of design. We have conducted supporting assessments which indicate that a residential development, finished in appropriate materials, that reflect the built form and vernacular of the village, would enhance the character of the local area.</p> <p>Whilst development at the Upper Pavenhill site would aspire to high design standards, it is the case that the site is flat and well contained by existing development. As such, the visual impact of development would be contained to a small number of existing dwellings which back onto the site.</p> <p>With regard to access, this would be achieved from the south via an improved entrance off Pavenhill. Such improvements would provide a wide vehicle splay and enhanced visibility. Further, development at the Pavenhill site could support improvements to the Pavenhill Road, such as ghost pavements or other mitigation measures, which would improve the amenity of local residents.</p>		

	COMMENT	RESPONSE	NP MODIFICATION
	<p>It is also important to note that Hills Homes Developments Ltd is an award winning local house builder, which specialises in the design and construction of bespoke housing developments, in rural settings. They have recent experience of working within Purton and the Hills Group has been a large employer in the area for many years. They are therefore keen to engage with the local community to create a high quality development which is fitting for a village with which they have a long association.</p> <p>We therefore consider that the site can accommodate a high quality residential development, which is set within extensive, but appropriate landscaping, and which is designed in collaboration with the local community.</p> <p>Conclusion</p> <p>We submit that the parcel of land located at Upper Pavenhill constitutes a suitable location for residential development. Our surveys and investigations indicate that the site could accommodate a development, which has been carefully designed to enhance the local setting and respond to the special character of the village.</p> <p>We would ask the Parish Council and Neighbourhood Plan Steering Group consider this letter as an invitation to engage with ourselves and our client, Hill Homes Developments Ltd, to help shape the future development of this site.</p> <p>We would welcome the opportunity to further discuss the site with members of the Council and Neighbourhood Plan Steering Group, and would gladly support a wider public consultation, so that the aspirations of the community can be supported through future development at the site.</p> <p>Yours faithfully, Peter Lawson Director</p>		

	COMMENT	RESPONSE	NP MODIFICATION
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Turley on behalf of Taylor Wimpey (site 448 Station Road)

	COMMENT	RESPONSE	NP MODIFICATION
	<p>REPRESENTATION TO PURTON NEIGHBOURHOOD PLAN</p> <p>We write, on behalf of our client, Taylor Wimpey, in response to the current consultation on the draft Purton Neighbourhood Plan. Our client has an interest in land to the East of Purton as shown on the enclosed plan. We have completed a feedback form with comments on specific policies but provide general comments on the Plan and its evidence base within this letter.</p> <p>GENERAL COMMENTS</p> <p>Having reviewed the Draft Neighbourhood Plan we consider that there are fundamental flaws, especially in those policies relevant to the supply of housing, which render the Plan not fit to proceed in its current form.</p> <p>For a range of reasons, we feel that the draft Plan and its specific policies are ambiguous and contradictory. Of particular concern is the basic premise that the many of the key principles of the National Planning Policy Framework (NPPF) and the adopted (post-NPPF) Wiltshire Core Strategy are wrong. Indeed, in reviewing the draft Plan and its evidence base, it becomes apparent that its authors have sought to cast this Neighbourhood Plan in such a way as it criticises the current planning system and plans for Purton in complete isolation. It is further concerning that the draft Plan and its evidence base is conceived of as a vehicle to reinvent and redefine key concepts relating to sustainable development, population forecasting and housing requirements. Such concepts (amongst others) are already established and defined through statute, the NPPF, appeal decisions, Local Plan examinations, judicial rulings and guidance.</p>	<p>Noted</p> <p>This is pure conjecture by the Respondent; nowhere is it indicated in the Plan or the Supporting Document Purton ~ Planning that the NPPF and Wiltshire Core Strategy are wrong, indeed, the Plan re-iterates its compliance with the guidance set-out in the NPPF and the Wiltshire Core Strategy.</p>	<p>None needed</p> <p>None needed</p>

	COMMENT	RESPONSE	NP MODIFICATION
	<p>Because the draft Plan starts from the position described, it proceeds to deviate from the relevant legislative and planning policy context. The draft Plan ignores the key principles of the NPPF, it misinterprets the strategic policies of the Wiltshire Core Strategy and largely discounts the Guidance provided in the PPG. Likewise, because of its varied shortcomings, the Plan fails to comply with the provisions of the Neighbourhood Planning Act (2017) nor does it meet the 'basic conditions', as per paragraph 8(2) of Schedule 4B to the TCPA 1990.</p>		
	<p>HOUSING</p> <p>The Neighbourhood Plan in its current form seeks to provide only for the housing needs of the village itself, without making any provision for wider housing needs. This stance is markedly at odds with the position of both Swindon Borough Council and Wiltshire Council, who have jointly prepared a cross-boundary analysis of housing need. Although these are yet to be published in their entirety, Swindon Borough Council has made public their findings in a report to the Joint Strategic Economic Committee in February 2017.</p>	<p>As a Large Village, development would predominately take the form of small housing sites within the settlement boundaries. The Core Strategy does not require Purton to provide a larger strategic role.</p> <p>As to the Joint Wiltshire-Swindon SHMA and FEMAA how they will affect the wider housing need and direction of travel for Purton cannot be meaningfully assessed until they are published later this autumn.</p> <p>It is likely the SHMA will affect the housing numbers and distribution for the principal urban area of Swindon and it likely will lead to further development at the western</p>	None needed

	COMMENT	RESPONSE	NP MODIFICATION
		edge of Swindon which has the necessary infrastructure, employment and facilities to support this growth. However it is premature to make the assumption as to how this might affect Purton before the JSEC report is in the public domain.	
	Having reviewed this it is clear that migration and economic relationships are an integral part of a market based housing system. For the Neighbourhood Plan to reject this is to ignore the requirements of the NPPF. Furthermore, in progressing its own population projections and analysis of a localised housing requirement, the Neighbourhood Plan is not deriving its figures from the housing requirement set out in the strategic policies of the Wiltshire Core Strategy, at odds with paragraph 16 of the NPPF.	The Core Strategy disaggregated housing numbers down to the Principal Settlements, Markets Towns and Local Service Centres. It does not identify the number at Large or Small Villages hence the need to identify separately the number of houses for Purton (i.e. population growth). Thus Plan does not conflict with Core Policy 2 nor the housing numbers defined in Wiltshire's Housing Land Supply Statement.	None needed
	The current housing requirement for Wiltshire (2006-2026) is expressed in Core Policy 2 of the Core Strategy, as being a minimum of 42,000 dwellings to be delivered across the LPA and 24,740 units to be provided in the North and West Housing Market Area (NWHMA) specifically. This is based on the analysis set out in the Wiltshire Strategic Housing Market Assessment (SHMA) 2012. Core Strategy Core Policy 19 apportions 1,455 dwellings to the Royal Wootton Bassett and Cricklade Community Area, within which Purton is located, with the majority of this growth being apportioned to Royal Wootton Bassett Town and the remaining 358 to	Copy of 2.25 to 2.27 of Turley's (Hill Homes) response. As previous, comment noted; Agreed, Core Policy 19 states that 358 houses are to be located in the wider community area outside Royal Wootton Bassett. It goes on	None needed.

	COMMENT	RESPONSE	NP MODIFICATION
	<p>be located within the wider community area.</p> <p>As such, the starting point for a Neighbourhood Plan must be the identification of objectively assessed housing needs by the Local Planning Authority and it is not for a Neighbourhood Plan to determine the level of housing requirement. Indeed, as noted, Wiltshire Council and Swindon Borough Council are preparing a joint SHMA, and it is this document that will further update the relevant OAN figure. It is at this current time unknown what the spatial distribution of this updated requirement will be. However, given Purton's role as a 'Large Village' it is likely that an increased proportion of housing growth (above that predicted in the document Purton Planning for the Future) will be required. Indeed, it is notable that Wiltshire Council is currently consulting on its pre-submission draft Site Allocations Plan and is committed to an early review of its Core Strategy.</p> <p>In attempting to independently model future population and household growth (and by explicitly applying this analysis within the draft Plan), the Neighbourhood Plan (which once made will become part of the Development Plan) is effectively seeking to extend beyond its remit. This occurs because the Plan seeks to circumvent the spatial and delivery strategy as set out in the Wiltshire Core Strategy at Core Policies 1 and 2, as well as the Core Strategy's strategic policies regarding the requirement for, and supply of, housing. Likewise, the Neighbourhood Plan cannot ignore the direction of travel as denoted by the joint Wiltshire - Swindon SHMA and FEMAA.</p>	<p>to state there were 248 completions 2006-14 and 24 specific permitted site leaving just 113 to be identified</p> <p>The Wiltshire Housing Land Supply 2015 records this number has reduced to 63 houses still to be identified (see par. 5 of Purton ~ Planning for the Future).</p> <p>It covers the number of houses still to identified across eleven parishes of Braydon, Broad Town, Clyffe Pypard, Cricklade, Latton, Lydiard Millicent, Lydiard Tregoze, Lyneham and Bradenstoke, Marston Meysey, Purton, Tockenham which together Royal Wootton Bassett make up the community area of Royal Wotton Bassett and Cricklade.</p> <p>Purton has identified the need for an additional 94 houses to 2026 which alone would meet the outstanding number of houses still to be identified.</p> <p>Of course the number in Core Policy 19 as modified by Wiltshire Housing Land Supply is a minimum number but does not preclude a greater</p>	

	COMMENT	RESPONSE	NP MODIFICATION
		<p>number of houses as in Purton's case.</p> <p>As to the Joint Wiltshire-Swindon SHMA and FEMAA, it is not possible to meaningfully assess these until they are published later this autumn.</p> <p>With regard to the last sentence, as previously stated how the SHMA and FEMAA will affect the direction of travel for Purton cannot be meaningfully assessed until they are published later this autumn.</p> <p>It is likely the SHMA will affect the housing numbers and distribution for the principal urban area of Swindon and it likely will lead to further development at the western edge of Swindon which has the necessary infrastructure, employment and facilities to support this growth. However it is premature to make the assumption as to how this might affect Purton before the JSEC report is in the public domain.</p>	

	COMMENT	RESPONSE	NP MODIFICATION
	<p>With a potential higher need identified, consideration should be given to sites outside of the settlement boundaries which could contribute both to the delivery of market housing and to the delivery of other forms of housing such as affordable and older persons. Our clients site on the Eastern Edge of Purton would be one such site which should be considered, having good links to the services and facilities within the village and being outside of the areas identified as being sensitive in landscape terms.</p>	<p>As a Large Village, the Core Strategy identifies that development should predominately take the form of small housing sites within the settlement boundaries but allows neighbourhood plans to designate sites outside the settlement boundary to meet local needs. The Plan does this by identifying a site to deliver other forms and mix of housing to meet local needs.</p>	<p>None needed.</p>
	<p>SITE SELECTION CRITERIA</p> <p><i>Methodology</i></p> <p>We have concerns regarding the approach the draft Neighbourhood Plan has taken towards the consideration and evaluation of sites which could potentially be allocated for development, with the main concern being the draft Neighbourhood Plan's failure to further sustainable development, as defined in the NPPF. Rather, it seeks to advance the invented concept of 'resilience' and applies this term as the basis for its consideration of a site's suitability for development.</p> <p>It is notable that the methodology employed finds that none of the sites considered actually meet the criteria of resilience as set out at Table 7 of Purton Planning for the Future (2017). Our clients site (ref 448 Land at Station Road) is considered 'marginal' within the assessment but if then omitted as it is in open countryside and not considered to be in walking distance to the village's shops and surgeries.</p>	<p>Essential as 2.75 to 7 of Turleys (Hills Homes) response:</p> <p>The rankings are to compare the relative merits of all the sites identified in the SHLAA 2012 and draft SHLAA 2015 against one another other and not against a set level.</p> <p>For completeness, the analysis included both sites within the settlement boundary and those outside. However the ranking is used to identify an optimal site outside the settlement boundary to meet the specific housing needs of the village.</p>	<p>Remove the wording in Table 7 and the following two paragraphs of Purton ~ Planning for the Future to remove references to Resilience and to clarify that the ranking is to compare sites against one another to identify an optimal for development outside the Settlement</p>

	COMMENT	RESPONSE	NP MODIFICATION																																	
		It is recognised that titles used in the table have caused ambiguity and the text needs to be clarified.	Boundary.																																	
	<p>In respect to the criteria employed to evaluate sites, we would make a number of specific comments. For ease of reference these are set out in tabulated form below;</p> <table><tr><th>Criteria</th><th>Weighting</th><th>Comment</th></tr><tr><td>Within Settlement Boundary</td><td>3</td><td>Recommend deletion: Why does a site’s location within the settlement boundary supposedly make it more sustainable or resilient, particularly when the majority of the other criteria employed are distance or impact based? A settlement boundary is simply a line on a map.</td></tr><tr><td>Distance to shops</td><td>3</td><td>Agree.</td></tr><tr><td>Distance to St Mary Infants and Junior School</td><td>2</td><td>Agree.</td></tr><tr><td>Distance to Bradon Forest Secondary school</td><td>2</td><td>Agree.</td></tr><tr><td>Distance to bus stop</td><td>1</td><td>Agree.</td></tr><tr><td>Distance to surgery</td><td>3</td><td>This is weighted too highly, given use of such facilities is (for most people) relatively infrequent. The weighting should be decreased to 2.</td></tr><tr><td>Distance to dentist</td><td>3</td><td>This is weighted too highly, given use of such facilities is (for most people) infrequent. The weighting should be decreased to 2.</td></tr><tr><td>Distance to chapel</td><td>1</td><td>Agree.</td></tr><tr><td>Distance to church</td><td>1</td><td>Agree.</td></tr><tr><td>Distance to Village Hall & Parish Council</td><td>2</td><td>This is weighted too highly, given the limited frequency with which the majority of residents will visit the Village Hall or Parish Council offices. The weighting should be decreased to 1.</td></tr></table>	Criteria	Weighting	Comment	Within Settlement Boundary	3	Recommend deletion: Why does a site’s location within the settlement boundary supposedly make it more sustainable or resilient, particularly when the majority of the other criteria employed are distance or impact based? A settlement boundary is simply a line on a map.	Distance to shops	3	Agree.	Distance to St Mary Infants and Junior School	2	Agree.	Distance to Bradon Forest Secondary school	2	Agree.	Distance to bus stop	1	Agree.	Distance to surgery	3	This is weighted too highly, given use of such facilities is (for most people) relatively infrequent. The weighting should be decreased to 2.	Distance to dentist	3	This is weighted too highly, given use of such facilities is (for most people) infrequent. The weighting should be decreased to 2.	Distance to chapel	1	Agree.	Distance to church	1	Agree.	Distance to Village Hall & Parish Council	2	This is weighted too highly, given the limited frequency with which the majority of residents will visit the Village Hall or Parish Council offices. The weighting should be decreased to 1.	<p>Direct crib of 2.18 of Turley’s (Hills Homes) response. As previous, comments noted and:</p> <p>It is agreed that whether a site is within or outside the settlement boundary does not in itself make the site more or less resilient or sustainable and so consider it can be deleted.</p> <p>However the settlement boundary is based on years of planning and functional association with the village. As a proxy, a “settlement boundary” contains a store of sustainable development thinking.</p> <p>The weighting of criteria is not based on distance but more on frequency and the importance of the criteria to residents. Health and is view by residents as very important and should remain unchanged though as frequency of visits to dentists (and generally not life threatening) can be reduced to 2.</p>	<p>Delete the weighting (Criteria) for “Within the Settlement Boundary” in the analysis of sites in Appendix 8 in Purton ~ Planning for the Future.</p> <p>Other than these two, the rest of weightings to stay as is apart from Dentists which is to be reduced down to 2 from 3.</p> <p>Change the wording for “Potential to impact view” to “Potential to impact sensitive and distinctive skylines and views.”</p>
Criteria	Weighting	Comment																																		
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COMMENT			RESPONSE	NP MODIFICATION
Distance to the Silver Threads	1	Agree.	<p>Village Halls are considered an important feature of village life and provide a focus for much of village life. As such the weighting to remain unchanged.</p> <p>Comment noted about views, heritage sites and designated conservation sites.</p> <p>In a rural environment, the local fauna and flora are considered important to residents. However it is arrogant to assume that this can only be assessed by on-site surveys conducted only by professionals. Local residents, many who have lived in the village all their life, will have amassed considerable knowledge of the sites/ fields that surrounds the village.</p> <p>Should also note that residents have a wider view on what is important rather than just protected species.</p> <p>Notably the Taylor Review (2008) argued that planning must not ... assess communities as they are now, rather what they could be and</p>	<p>Change the wording for Heritage to "Potential to adversely affect the character or setting of heritage assets".</p> <p>Delete the criterion "Potential added value" and replace be a new criterion "Community Enhancements" based on the principles outlined in the Taylor Review (2008).</p>
Distance to vet	1	Agree.		
Distance to library	1	Agree.		
Distance to The Village Centre (Red House, etc.)	2	Agree.		
Distance to The Angel	1	Agree.		
Distance to The Royal George	1	Agree.		
Proximity to allotments	1	Agree.		
Potential flooding	3	Agree.		
Potential to impact view	3	Specific reference should be made to an impact being detrimental. Affecting a view (i.e. from a dwelling) does not mean that it is harmful and loss of a view is not a material consideration.		
Potential to affect character or settings of any listed building or heritage assets	3	This should be revised such that it refers to the potential adversely affect the character or settings of such heritage assets.		
Good access	3	Agree.		
Within, or in close proximity to, a designated conservation site (e.g. SSSI, CWS ...)	3	This should be amended, as proximity to a designated conservation site does not mean that the biodiversity value of that site would be adversely affected by nearby development.		
Known, or likely, to have badgers, great-crested newts, bats or deer	3	Recommend deletion of this criteria as this can only be effectively assessed with on-site surveys, as part of a planning application.		
Potential added value (reduce traffic congestion, parking on	3	Recommend deletion of this criterion, as it is highly subjective when compared to most other criteria which are distance-based or can be evaluated in a relatively		

	COMMENT	RESPONSE	NP MODIFICATION
	<p>roads ...) objective manner.</p> <hr/> <p>Comments on Site Evaluation Criteria</p> <p>To elaborate further on the table above, we would first clarify that considerations of a site's sustainability should be blind to its location within or outside of a settlement boundary. A settlement boundary is not a measure of sustainability, but rather a line on a map. To treat it as a constraint is to disregard the requirement to promote sustainable development, as necessary under Section 39 of the Planning and Compulsory Purchase Act (2004).</p> <p>With respect to access to services, consideration should be given to the frequency with which people will likely access them. Most residents will access local shops on a relatively frequent basis. However, the majority will engage the services of a doctor or dentist relatively infrequently. The same could also be said regarding the criteria relating to proximity to the Parish Council offices and Village Hall, as most residents will visit these occasionally, if at all.</p> <p>In considering the ecology related criteria, we agree that if a site falls within such a designation then this likely constitutes a constraint. However, we note that proximity to a local nature designation does not actually mean that development would be detrimental to it. Likewise, it is inconsistent to evaluate a site's suitability for allocation on the basis of a site being 'known, or likely, to have badgers, great-crested newts, bats or deer'. The presence of such species does not automatically preclude development and development proposals often facilitate biodiversity enhancements as part of a comprehensive scheme, though the provision of green infrastructure (noting also, and for example, that agricultural fields are typically lacking in bio-diversity). As such, this cannot be considered to constitute a robust or appropriate criterion for assessment and accordingly it should be deleted.</p>	<p>we should be asking: <i>...will this development enhance or decrease the sustainability of this community – balancing social, economic and environmental concerns?</i></p> <p>Interestingly, the Taylor Review also noted that there is “<i>...the requirement for the planning system to shake off a narrow approach to what we mean by sustainable (which often undermines longer-term sustainability) so that planning can help deliver a genuinely more sustainable, living, working countryside.</i>”</p> <p><i>Purton ~ Planning for the Future</i> recognises this imperative and does just that and considers a range of potential housing and business locations and assesses them for their true potential and constraints against many social, economic and environmental criteria. In particular, it asks <i>...will this development enhance or decrease the sustainability of this community – balancing social, economic and environmental concerns</i> by looking</p>	

	COMMENT	RESPONSE	NP MODIFICATION
	<p>Finally, 'added value' is entirely subjective and we would question its inclusion within a site selection exercise. It does not relate to any measurable feature, nor is it at all transparent. As such it should be deleted.</p>	<p>at the Community Enhancement that a potential location could bring in terms of social inclusion (by proximity to services and facilities) economic growth (by ease of links to work) and environmental enhancement (not creating additional parking on roads for instance, not creating additional congestion, not fragmenting known biodiversity and habitats and so on).</p>	
	<p>CONCLUDING REMARKS</p> <p>As currently configured the draft Neighbourhood Plan does not meet the basic conditions, as set out in paragraph 8(2) of Schedule 4B to the TCPA 1990. The draft Plan does not contribute to the achievement of sustainable development. Indeed, it sets out to denounce and subvert this key concept which is integral to the planning system. The draft Plan fails to have regard for national policies and guidance, and is in conflict with a number of strategic policies within the adopted Wiltshire Core Strategy.</p> <p>If you have any queries in relation to our comments, or would like to discuss them, or our clients' site, further please do not hesitate to contact me.</p> <p>Yours sincerely [REDACTED] Director</p>	<p>Copy of 3.21 of Turley's (Hill Homes) response. As previous, comment noted;</p> <p>Respondent's views noted and the individual points raised have been dealt above.</p>	<p>No further action is needed as they have been addressed above</p>

	COMMENT	RESPONSE	NP MODIFICATION
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Turley on behalf of Taylor Wimpey (site 448 Station Road) Feedback Form

	COMMENT	RESPONSE	NP MODIFICATION
	<p>Policy 5 – Settlement Identity</p> <p>Whilst we understand the desire to retain the separate identity of Purton from the urban area of Swindon, the Neighbourhood Plan should not preclude any development from coming forward on the Eastern edge of Purton if, having considered all of the options, it is considered to be the most suitable location for future development.</p>	<p>Sites on the eastern edge of Purton are not precluded if they are within the settlement boundary but Core Policy 1 excludes development outside the settlement boundary unless supported by a neighbourhood plan.</p>	<p>None needed.</p>
	<p>Policy 12 – Development Principles</p> <p>We have a number of concerns regarding this policy which we set out below.</p> <p>Firstly the number of dwellings which can be delivered on the identified sites is considered to be ambiguous, with a review of the site assessments (included at Annex 8 of the Plan) suggests the delivery of 66 dwellings as oppose to the 75 noted within the policy. Furthermore this does not take into account the need to demolish existing dwellings at Hooks Hill.</p> <p>Secondly, the policy presumes that all of the in-settlement sites will come forward for development, this is an unreasonable presumption which is not borne out in housing delivery evidence and which does not include any allowance for non-</p>	<p>This misinterprets the number of houses for sites 3316 which is ten and site 3318 which is 20.</p> <p>In relation to Hooks Hill, there is a possibility it may not provide a net gain but with the 40 units identified the settlement boundary it will meet the housing numbers.</p> <p>Essentially as 2.35 of Turleys (Hills Homes) response:</p>	<p>The Wording for sites 3316 and 3318 in “Purton ~ Planning for the Future” needs to be clarified to avoid the confusion shown</p>

	COMMENT	RESPONSE	NP MODIFICATION
	<p>implemented, ordinarily set at around 10% and within Wiltshire Council's figures at 13.4%. Furthermore the fact that two of the sites (North View and the Former Youth Centre) have not been promoted for development again brings into question their deliverability. There is no evidence to suggest that they will come forward, as required by the PPG at Paragraph 040 reference 41-040-20160211.</p> <p>Thirdly, linking policy 12 to policy 13 (with the inference that all in settlement sites will come forward before any outside of the settlement boundary) is problematic as there is no guarantee that all in settlement sites will come forward and as such Policy 13 may never be activate. This could result in a situation where the quantum of housing delivered is significantly below that envisaged (setting aside issues in relation to the quantum which is discussed below) but Policy 13 will never be activated. This would leave the decision maker in a difficult position of not knowing how to apply the policy. We would therefore suggest that Policy 12 does not meet the requirement of the PPG at paragraph 041 Reference ID: 41-041-20140306.</p> <p>Finally we feel that the policy, as drafted, is in conflict with other elements of the Plan. For example the Plan acknowledges that not all housing needs identified can be met on small sites within the existing settlement boundary and that the development of larger sites is necessary to deliver affordable housing and older people housing (which are all identified as needed) but the policy then restricts development which would deliver those. This is at odds with Core Strategy Policy 45.</p> <p>In conclusion we feel that Policy 12 is not in compliance with is in conflict with the policies of the Wiltshire Core Strategy, the PPG and the National Planning Policy Framework and cannot, therefore, be considered to be robust or to meet the requirement for Neighbourhood Plans. We feel that this Policy needs reconsidering in its totality.</p>	<p>The statement in Policy 12 that requires housing within the settlement boundary to be brought forward before land outside the settlement boundary may be counter-productive and prevent development taking outside the settlement boundary if not all the sites are developed. The basic objective was to ensure a uniform development and development outside the boundary should be undertaken first at the expense of development inside the boundary preferred by residents.</p> <p>Respondent's views noted and apart from the issue identified above, it is not in conflict with the Wiltshire Core Strategy of PPG and NPPF.</p>	<p>Revise wording in Policy 12 to remove this restriction.</p> <p>None further needed.</p>

	COMMENT	RESPONSE	NP MODIFICATION
	<p>Policy 13 – Development outside settlement boundary</p> <p>Given our concerns regarding Policy 12, we feel that it is clear that the Neighbourhood Plan has no realistic prospect of meeting the housing needs within the settlement boundary, not least due to the unlikely delivery of the types of dwellings needed.</p> <p>As currently written there is no clear indication as to whether the policy is supposed to be used in consideration all development proposals outside off the settlement (as the title implies) or just the specific site referenced in the policy, but noted as a potential area of search. Accordingly, it is not clear how this policy could be used to determine planning applications and in turn is in conflict with Core Policy 2 of the Core Strategy.</p> <p>Furthermore, the prescriptive nature of the policy in so far as it relates to SHLAA sites ref. 470 and 440 (part) omits any consideration to viability in relation to the deliverability of sites and the benefits that a higher density of development could potentially bring in terms of housing types (affordable, older persons housing etc).</p> <p>As presently worded we feel that Policy 13 does not contribute to sustainable development, it burdensome and creates viability issues, meaning it is incapable of delivering its stated objectives of delivering a range of types of accommodation to meet local needs. It is in conflict with the policies of the Wiltshire Core Strategy and is not considered to be in general conformity with the basic conditions.</p>	<p>The Plan in Policy 12 completely recognises that Purton housing needs cannot be met from within the settlement boundary alone and that a site outside the settlement boundary is needed to meet the need</p> <p>The text in Policy 13 is clear in that it applies only to a single site at Restrop Road as identified on Map 12 and to no other site outside the settlement boundary.</p> <p>Policy 13 does not prohibit higher housing density though prefer housing density to be suitable for a rural environment.</p> <p>Policy 13 does not create any viability issues and is capable of delivering the mix of houses Purton needs.</p>	<p>None needed.</p> <p>None needed.</p> <p>None needed.</p> <p>None needed.</p>