



Comments on TisPlan Pre-Submission Version

Comments on intro/overview pg 4-18

The third paragraph of the Executive Summary of Tisplan on page 5 references the housing development 'target' imposed on Tisbury in the 2006 Wiltshire Core Strategy. However, Core Policy 27 of the adopted Wiltshire Core Strategy sets out the spatial strategy for Tisbury Community Area. It states that over the plan period (2006 to 2026):

- 1.4 ha of new employment land (in addition to that delivered or permitted at April 2011) will be provided (primarily at Hindon Lane, which is a saved Salisbury District Plan allocation).
- approximately 420 new homes will be provided (200 at Tisbury and approximately 220 in the rest of the community area).

The emphasis on employment follows the overarching focus of the Wiltshire Core Strategy which places an emphasis on economic growth as the driving force behind meeting its objectives of creating stronger, more resilient communities. Paragraph 1.2 of the Wiltshire Core Strategy goes on to say, "*The underpinning idea of the strategy is to strengthen communities, wherever possible, by maintaining and increasing the supply of jobs to ensure that Wiltshire remains strong and prosperous.*"

This 'driving force' of the Wiltshire Core Strategy has been missed out from setting the scene in the TisPlan Executive Summary, and indeed from the Neighbourhood Plan as a whole.

Further, the whole tone and direction of the neighbourhood plan is one that seeks to do only what is the absolute minimum in terms of housing delivery. The plan identifies a range of issues and problems that need to be addressed but it does not respond positively to how development could deliver those needs and improvements to help sustain Tisbury in the future. A more proactive and open minded approach could help the community achieve its aims.

The Neighbourhood Plan Time Period

The Localism Act 2011 provides legislation for communities to draw up neighbourhood development plans, provided a neighbourhood plan is in line with national planning policy, with the strategic vision for the wider area set by the local authority, and meets other legal requirements.

This is reiterated in paragraph 184 of the Government's National Planning Policy Framework which states,



“Neighbourhood plans must be in general conformity with the strategic policies of the Local Plan. 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. Neighbourhood plans should reflect these policies and neighbourhoods should plan positively to support them. Neighbourhood plans and orders should not promote less development than set out in the Local Plan or undermine its strategic policies.”

The local plan in this case is the Wiltshire Core Strategy, which was adopted in January 2015. This plan covers the plan period 2006-2026. Much work went into calculating requirements for development, such as housing and employment, for this plan period. However, the TisPlan has extended the plan period, from 2017 to 2030. Paragraph 4 of the TisPlan Executive Summary states that *“Given that a substantial percentage of our development target has already been achieved, we have extended the TisPlan timeframe beyond 2026, to 2030.”* This is not a justifiable or adequate reason or justification.

It is our understanding that the Joint Strategic Economic Committee has started work on the Wiltshire and Swindon Strategic Housing Market Assessment (SHMA) and Functional Economic Market Area Assessment (FEMAA) for plan making for the next plan period 2016-2036. Until this work is complete and figures, assumptions and development strategy are tested at examination through the Plan making process, no assumptions can be made.

Clearly, however, the end of the plan period is relatively soon and the Wiltshire Local Plan will need to be reviewed quickly along with neighbourhood plans. Any future review will inevitably mean more housing development will be required. As such, it would be feasible for a neighbourhood plan that extends beyond the Core Strategy plan period to allow for some *additional* growth by identifying and including future development sites. At a minimum a pro rata annual rate of development could be put forward, but this could prejudice the proper strategic planning of Wiltshire and quantum that may apply to Tisbury and other settlements.

As currently drafted, the Tisbury and West Tisbury Neighbourhood Plan 2017-2030 cannot be considered to be in general conformity with the adopted Wiltshire Core Strategy as the time frame extends the plan period without any justification or assessment, and makes no allowance for the development needs of the additional four years from 2026-2030.

Sustainable Development

It is encouraging to see, at the bottom of page 5 and top of page 6 of the Executive Summary of the TisPlan, reference to the three dimensions/roles of sustainable development as set out in paragraph 7 of the National Planning Policy Framework. These three roles have not been referenced in previous versions of TisPlan, nor during consultation or consideration of potential development sites.



However, reference to paragraph 8 of the National Planning Policy Framework has been omitted. This paragraph is important as it states that these roles should not be undertaken in isolation because they are dependent on each other and all three elements should be sought jointly and simultaneously through the planning system.

We consider that the National Planning Policy Framework's approach to sustainability should be reflected in the Neighbourhood Plan as an overarching concept and should be incorporated into the consideration/comparison of sites for development.

The first role dealing with the economy has been taken on board as it is recognised in the neighbourhood plan and Executive Summary that it is important to maintain Tisbury's role as a local service centre "*wherever possible retaining and promoting local employment.*"

The third role, environmental sustainability, has also been addressed in the neighbourhood plan, and is referenced in the Executive Summary, with regard to biodiversity, the natural environment and the AONB.

We are concerned, however, that the social element, and particularly health, has not been addressed with equal weight to the economic and environmental roles and that the interdependency of all three elements has not been fully addressed.

There appears to be no transparent comparative sustainable development methodology applied to the various sites that have been considered, either in the neighbourhood plan or the Site Assessment undertaken by AECOM. As such there is no transparent weighting or assessment that can be analysed; it is purely subjective and relatively constrained in its approach.

It appears that the redevelopment of brownfield land has been championed above other sustainable development criteria, rather than as one (weighted) criteria and has not been compared against other equally important criteria. As such the social dimension of sustainable development seems to have been a lesser consideration, particularly when considering the health, living environment, community integration and ease/proximity to services and facilities of new residents. The redevelopment of previously developed land is not necessarily sustainable depending on other issues such as location, separation from main settlement, contamination, environmental issues, access and availability of service and facilities, etc.

The championing of brownfield sites can be seen right from the outset of this process and is illustrated by the TisPlan Questionnaire, where question 6 asks what type of development is preferred on the five known brownfield sites, whereas the question regarding greenfield sites



purely considers housing. No comparative sustainable development analysis was presented on any of these options; hence, the public were not presented with objective information.

There appears to be no transparent comparative sustainable development methodology to move from the objectives and the identified needs set out in the neighbourhood plan, through to assessing each of the sites and then onto how each site then meets the objectives and needs. As such, the TisPlan cannot be considered to be in general conformity with the adopted Wiltshire Core Strategy or national planning policy.

Comments on Buildings section pages 14-29

The first paragraph of page 14 states the requirement for housing, as set out in the Wiltshire Council Housing Land Supply Statement (2016) is 24 additional houses in the plan period. This should be reflected in the third paragraph of the Executive Summary, which references 39 additional dwellings, for consistency.

Policy BL1 is supported in principle; however, it does not say where these types of housing would be acceptable.

Policy BL2 is not a planning policy. How affordable dwellings are allocated is a matter for the registered provider to determine in accordance with their criteria, not for a neighbourhood plan to set out. **As such, this policy is not in conformity with the Wiltshire Core Strategy nor national planning policy and should be deleted.**

Policy BL3 boldly states that, *“the redevelopment of previously used land will always be preferred”*. As set out in our comments on the introduction/overview of the plan pages 4-18, redeveloping brownfield land should only be one criteria when assessing whether potential development is sustainable. All aspects of economic, environmental and social sustainability should be considered jointly and simultaneously, to comply with the Wiltshire Core Strategy and National Planning Policy Framework. If it was proven that individual brownfield sites were sustainable, when considered against economic, environmental and social criteria then a different policy should be written.

Policy BL4 Site Allocation: Station Works

We find the choice of Station Works for partial residential redevelopment an interesting one, given the responses to the TisPlan Questionnaire. Out of the five brownfield sites in Question 6, Station Works recorded the lowest percentage when it came to considering housing as an appropriate use with 19%. The Old Magistrates Court registered 27%; land adjacent to Trellis House registered 32%; Wilts Council Highways Depot registered 49% and the Disused Quarry at Tuckingmill registered 46% in favour of housing. Conversely, Station Works registered the highest score of any site when considering commercial redevelopment (14% as opposed to 7%,



3%9% and 8% respectively) and redevelopment for parking (19% as opposed to 14%, 14%, 2% and 1% respectively). This, combined with the lack of objective sustainability criteria, makes the decision to allocate Station Works unclear and opaque.

Policy BL4 allocates the site at Station Works for 'comprehensive redevelopment', but the quantum of the various proposed uses is not given. It is also unclear as to whether 'elderly care, continuous living complex with on-site provision for care and recreation' is part of the 24 additional units (identified elsewhere in the plan) to be provided, or as it's a separate use class is it in addition to the new market housing? This requires clarity.

Wiltshire Core Strategy Policy 46 addresses the needs of Wiltshire's vulnerable and older people. It states that such accommodation should be provided in sustainable locations, where there is an identified need, within settlements identified in Core Policy 1 (normally in the Principal Settlements and Market Towns) where there is good access to services and facilities. Tisbury is not a principal settlement nor market town, but a local service centre. Policy 46 deals with such circumstances by stating,

"In exceptional circumstances, the provision of specialist accommodation outside but adjacent to the Principal Settlements and Market Towns will be considered, provided that:

- *a genuine, and evidenced, need is justified*
- *environmental and landscape considerations will not be compromised*
- *facilities and services are accessible from the site*
- *its scale and type is appropriate to the nature of the settlement and will respect the character and setting of that settlement."*

It is contended that due to the lack of evidence in the neighbourhood plan to substantiate this part of the policy as well as the isolation and separate location of Station Works and its poor proximity to Tisbury's facilities and services, that this site is not appropriate for elderly care.

Further, Dudsbury Homes Southern has received correspondence from three specialist leading developers of older person housing (Churchill, Renaissance and McCarthy Stone) which states that the Station Works site is not considered suitable given its proximity to the rail station and its isolation from the services and facilities of Tisbury. If a provider for this specialist use could not be found, this would present a further barrier to delivering development, in addition to those set out below.

It is accepted that Station Works could be considered 'an uncompromising built form' and that redevelopment (or part redevelopment) may be preferable, but that does not mean that the land uses should be removed from this site or the overall Tisbury offer of employment land uses. It would be far preferable for this site to remain with its current land uses, with some



enabling employment redevelopment to both improve its employment offer and make it more attractive. Locating residential development, as proposed in the neighbourhood plan, on a site with B2 and B8 uses would be unacceptable in planning and residential amenity terms.

There is no evidence presented to demonstrate that there is no longer a need for the quantum of B2 or B8 uses at Station Works nor how much will remain under the redevelopment proposals and how that will satisfy need or Wiltshire Core Strategy policy. Indeed, there are businesses currently on the site which would indicate there is a need.

Further, when considering the site for housing, Wiltshire council has stated,

“Although the site could become available, and housing could be delivered, it is identified in the Employment Land Review (ELR) as an employment site. The ELR also identifies that there is an opportunity to redevelop all or part of the site to provide a greater amount of purpose built business space for B1 or B2 use. This is one of Tisbury’s last remaining employment sites, as the village functions as a local service centre, and should be protected to ensure the continued sustainability of Tisbury.

The site represents one of the last employment sites in Tisbury and should be retained as such. The landowner should be encouraged to intensify and redevelop the site with modern business space. (Author’s emphasis).

Government policy, set out in the National Planning Policy Framework (paragraph 22) acknowledges that land allocations should be regularly reviewed and should not be protected in the long term where there is no reasonable prospect of a site being used for that purpose, *“having regard to market signals and the relative need for different land uses to support sustainable local communities”*. By definition, this cannot apply to sites that are in use. Such sites should therefore be protected and in turn support sustainable local communities.

Redeveloping the site to make it a more attractive employment site, without losing its array of employment uses, would be a more viable option as decontamination would not be required nor would a new bridge across the railway line. It would also present more opportunities to safeguard space for dualling the railway line and providing a second platform.

The proposed redevelopment of this site to remove some valid and sustainable employment land uses from an appropriate existing site are contrary to the National Planning Policy Framework and the Wiltshire Core Strategy.

Location for Housing

It is acknowledged that Tisbury is within the Cranborne Chase and West Wiltshire Downs AONB, and therefore any housing development would need to be sympathetically designed and located. It is understandable too, in such an area, that a previously developed site which is



visually uncompromising would have an overall benefit if it were redeveloped for mixed use. However, the amenities of the new residents, general sustainability principles and the loss of employment use must be weighed against AONB issues.

The eleventh core principle in paragraph 17 of the National Planning Policy Framework states that planning should, *“actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable”*.

It is acknowledged in the Wiltshire SHLAA assessment of the Station Works site, that access to Tisbury is poor by road. It has no footpath currently and as shown in the neighbourhood plan, on page 56, the road under the railway bridge is liable to flooding. The neighbourhood plan requirement for a bridge over the rail track is extremely ambitious given Network Rails general negative approach to crossings over its land and main lines, particularly near stations. The site itself has limitations which may limit options of being able to physically accommodate a bridge for vehicular and pedestrian access. Further, there will be a requirement for a landing of a bridge or tunnel on the other side of the railway as well as a pedestrian link to the existing footpath, all of which is likely to be in separate ownership and will take time and money to resolve.

Notwithstanding the comments above considering elderly persons accommodation, this poor access issue is further complicated by the neighbourhood plan requirement for development that provides for the ageing population (e.g. an elderly care, continuous living complex). Normally these types of facilities are located near to the town centre to optimise easy access for people to socialise, shop and participate in recreational activities. Accessing the town via a road without footpaths would be unsafe or via a footbridge over the rail track would not be physically easy, particularly if residents had limited mobility due to their age or care needs.

The railway, although currently single track, still has a significant number of mainline trains using it daily. Locating housing so close to such a noise generator would negatively impact the residential amenity of the development, particularly for outdoor garden use. Poor air quality could also be an issue. These issues would be significantly worse if the Parish Council's ambitions for dualling of the railway line and a second platform were realised.

Conversely locating any sort of residential development so close to the rail line on the Station Works site will seriously adversely affect the ability to fulfil the ambition to dual the railway line and have a second platform, as future residential amenity would have to be considered. It would be far better to keep this site purely for employment uses where such amenity issues do not come into play.



In addition to the site's poor location, Station Works is a former gas works and will, therefore, be subject to contamination. This will limit the opportunity for gardens and given the likely cost of decontamination clear up costs, in addition to the bridge costs and safeguarding land for a bridge and/or second platform, it will limit the site's viability for mixed use redevelopment. It would be far better to leave the site as an employment site, albeit partially redeveloped to update the site and make it more attractive, as this would not require the need to decontaminate the land as there would be no people living on the site and minimal land disturbance.

When considering what it would be like to be a resident living on this site, the proposed redevelopment must be questioned. Tisbury residents will be living on an isolated small industrial/business park site within 50-60 metres of a busy, noisy mainline railway with poor pedestrian links, little if any gardens/amenity space and no sense of community. Is this really a vision for village living in the 21st century? This does not, in our opinion, constitute sustainable development as envisaged in the National Planning Policy Framework.

Deliverability

The ability of the site to be delivered for housing will be impacted by the following issues:

- The site currently has tenants on it. If proved that the site is no longer required to fulfil the Wiltshire Core Strategy employment land requirement AND an alternative site is found to replace these uses in addition to the 1.4 hectares of new employment uses, then the tenants will have to be served notice. This may take some time.
- Policy BL4 (ii) Site Allocation: Station Works makes it clear that no development may commence until a new bridge across the railway line has been built and space safeguarded for a second platform. However, no land on the other side of the railway line forms part of this policy area and has not been safeguarded for landing of a bridge. This is a massive unknown and could significantly delay or negate completely the deliverability of this site, if this was used as a ransom. It is also noted that the wording of this part of the policy has changed from 'a new pedestrian crossing of the railway line, bridge or tunnel' to 'bridge'. Further the comments in Table 5.1 of the Site Assessment states that a safe vehicle and pedestrian access into Tisbury village must be put in place as a condition of development. This would make the site even less deliverable.
- Financial viability of the proposed scheme. With so many constraints and conditions being applied to an already difficult site, the financial viability of this proposal must be in question. Even if all the constraints could be overcome and conditions met, values of the small number of private houses would be so low due to location near the railway and neighbouring non-residential uses, that the amount of affordable housing will be limited (if any) and no other community benefit could be achieved. On behalf of Dudsbury Homes we



have run a viability appraisal of the proposed development and cannot get the proposal to stack up financially. We do not believe that the proposed allocation is deliverable.

Conclusion on Station Works

Station Works should be retained as one of the last employment sites in Tisbury, particularly as it has existing B2 uses on it, which form a valid part of the Tisbury employment land offer and could not be relocated easily as these uses are unacceptable close to housing.

If the existing buildings are considered to have a detrimental impact on Tisbury, then the owner should be encouraged to redevelop part of the site for more versatile and diverse employment uses, and be of a size and form suitable for modern commercial uses such as office, technology-focused businesses, etc.

This would also assist the neighbourhood plan to be more in line with the National Planning Policy Framework and the employment policies of the Wiltshire Core Strategy.

Alternative Housing Site

The ambition of the neighbourhood plan to promote the reuse of previously developed land ahead of greenfield is laudable, if proven that all sites are sustainable; however, that ambition equally applies to employment land as well as housing. Removing employment uses (even partially) from a site that is still in use, that should be protected, doubles the issues the neighbourhood plan must deal with, particularly when having to find alternative sites for B2 and B8 uses. Far better to leave the Station Works as employment and find an alternative - more sustainable, better located - site for the housing requirement, including the neighbourhood plan's ambitions for providing for the ageing population and affordable homes, including low cost starter homes.

Land south of The Avenue, east of Nadder Close is approximately 13.6 hectares in area in total. However, it is only land to the north of the site where development is proposed (outside the flood zone). This area can accommodate the required additional units, and may provide a further opportunity to help meet housing need in the wider Tisbury Community Area.

The land has an agricultural Grade 4 classification of poor land quality. Meandering through the site is the River Nadder. The land to the north is currently grazed, land to the south is planted with young willows. It is the northern part of the site where potential for development exists.

The southern part of the site adjoins the railway, the western boundary borders the bowls club and recreation ground and the eastern boundary borders Tisbury Row. The site is partly within Flood Zone 2 or 3 which means that it is liable to flood. It is NOT proposed to build on this part of the site; however, this land could form part of informal recreational area for the whole community to enjoy, potentially linking to the bowls club and recreation ground.



The site was submitted to Wiltshire Council as part of their Strategic Housing Land Availability Assessment (SHLAA) and it considered the northern part of the site, outside of the flood risk area, to be capable of delivery within five years.

This site would form a natural extension to Tisbury, allowing new homes to be physically integrated into the village and residents to be socially included and within easy walking distance of the High Street and other village amenities and facilities.

Affordable housing and homes for older people downsizing could be provided in the western part of the site, nearest the High Street, to allow easy and safe walking access to the village facilities.

Not only would this site form a natural extension to the village, but it would provide a high quality living environment for residents and could provide the mix of housing development set out in the neighbourhood plan to help balance the Tisbury community. Further, the site could address other issues set out in the neighbourhood plan such as providing more parking facilities for the village and rail station, additional open space for the whole community to enjoy and easy access for residents to the train station.

There are no environmental detractors, such as employment uses or mainline railway, to impact any new residents.

Conclusion on Alternative Housing Site, Land south of The Avenue

In comparison to the Station Works proposal, this site only has positive attributes:

- it does not remove any equally important land uses
- it will be physically and socially integrated into the village
- it has easy walkable access to the village facilities and amenities for all residents
- it does not have a heavily compromised living environment
- it does not put unsuitable uses together
- it has no physical constraints on the developable area
- it will not require significant and time consuming bridges/tunnels or decontamination
- it will provide a high quality addition to the built form of the village
- it is deliverable immediately
- it is financially viable
- it can provide wider community benefits such as an additional village car park and public open space, including riverside walk
- it can be designed to protect the water meadows (recently added to Policy CT2) and any known protected species
- it will allow Tisbury residents to feel part of the village and contribute to its future.



As such, land south of The Avenue should be allocated for housing development in the neighbourhood plan instead of Station Works. Station Works, as one of the last employment sites in Tisbury, should be protected as such and allocated for redevelopment of complimentary employment uses that contribute to fulfilling the Wiltshire Core Strategy employment land quantum.

Wiltshire Council Cabinet Paper 20 June 2017

The Cabinet considered the Wiltshire Housing Site Allocations Plan on 20 June 2017.

Paragraph 4.71 of the report acknowledges that Local Service Centres, such as Tisbury, are defined as smaller towns and larger villages which serve a surrounding rural hinterland and possess a level of facilities and services that together with improved local employment, provide the best opportunities outside the Market Towns for greater self containment. Whilst levels of housing development envisaged at Mere and Downton fit with that strategy, the level of development proposed for Tisbury is lower. It acknowledges that Station Works site is under consideration through the neighbourhood planning process and, if approved, would meet Tisbury's indicative housing requirements.

However, paragraph 4.72 goes on to state that the Housing Sites Allocation Plan does not propose any allocations in the Tisbury Community Area, despite requiring 149 new dwellings, because of a variety of constraints and a lack of land availability. This latter point clearly being incorrect with Land south of The Avenue being suitable, available and deliverable.

On the basis that Tisbury has a mainline rail station and is identified as a settlement that provides the best opportunities for greater self containment, outside market towns, it would be logical to reallocate some of the indicative residual housing requirement from the Community Area to Tisbury itself.

Land south of The Avenue could accommodate the residual requirement for Tisbury, and as a comprehensively planned site, could also accommodate some of the residual housing requirement for the wider Tisbury Community Area without compromising the integrity of the village.

Comments on Employment and Enterprise pages 40-43

This section of the neighbourhood plan has been the subject of a number of significant changes. Not least EM2 is now entitled Protecting Employment Activity, rather than Employment Activity in the Village Centre.



Policy EM2 references Wiltshire Core Strategy Policy 35 which safeguards employment sites from non-employment uses. It states,

“Within the Principal Settlements, Market Towns, Local Service Centres and Principal Employment Areas proposals for the redevelopment of land or buildings currently or last used for activities falling within use classes B1, B2 and B8 must demonstrate that they meet, and will be assessed against, the following criteria:

- i. The proposed development will generate the same number, or more permanent jobs than could be expected from the existing, or any potential employment use.*
- ii. Where the proposal concerns loss of employment land of more than 0.25 ha in the Principal Settlements, Market Towns or Local Service Centres it is replaced with employment land of similar size elsewhere at that settlement.*
- iii. It can be shown that the loss of a small proportion of employment floorspace would facilitate the redevelopment and continuation of employment uses on a greater part of the site, providing the same number or more permanent jobs than on the original whole site.*
- iv. The site is not appropriate for the continuation of its present or any employment use due to a significant detriment to the environment or amenity of the area.*
- v. There is valid evidence that the site has no long term and strategic requirement to remain in employment use; the ability of the site to meet modern business needs must be considered, as well as its strategic value and contribution to the local and wider economy both currently and in the long term. It must be shown that the site is no longer viable for its present or any other employment use and that, in addition, it has remained unsold or un-let for a substantial period of time (at least 6 months), following genuine and sustained attempts to sell or let it on reasonable terms for employment use, taking into account prevailing market conditions.*
- vi. The change of use is to facilitate the relocation of an existing business from buildings that are no longer fit for purpose to more suitable premises elsewhere within a reasonable distance to facilitate the retention of employment.”*

Clearly the redevelopment of Station Works, under TisPlan Policy BL4, is contrary to this policy: by definition the site cannot be redeveloped for B1, B2 and B8 uses along with residential



development because B2 and B8 are not suitable neighbours for residential development; no replacement site has been allocated; no evidence or information has been put forward for assessment to prove the same number and type of jobs will be created; the site is occupied and therefore fails criterion v. and no evidence or allocation has been put forward to meet criterion vi.

By definition, general industrial uses (B2) should be located away from residential areas where its associated noise and traffic would be unacceptable. As such, the existing site is an ideal site for such uses, which form part of a comprehensive employment offer for Tisbury, and should be protected. If the ambition, as stated in paragraph 5.145 of the Wiltshire Core Strategy, is to balance development and minimise out-commuting then the widest offer of employment opportunities should be promoted and protected.

As such, TisPlan Policy BL4 is contrary to Wiltshire Core Strategy Policy 35 and, therefore, cannot be considered to be in general conformity with the adopted Wiltshire Core Strategy.

Further, the employment and business/enterprise policies of TisPlan do not address the need for 1.4 hectares of NEW employment land specified in the Wiltshire Core Strategy (at Hindon Lane or elsewhere) as it does not clearly identify sites that could accommodate this quantum. **As such, TisPlan is not in general conformity with the adopted Wiltshire Core Strategy for this reason also.**

Comments on Leisure, Community and Wellbeing pages 44-49

Despite the allocation of Station Works not being in conformity with Wiltshire Core Strategy, and it having many significant issues that may make it undeliverable, if it were to go ahead it would undoubtedly fail yet another policy – LCW3, Amenity Space. Given the contamination on site, the limited site dimensions, the need for a bridge and location next to a mainline train station, it would not be able to contribute towards the provision of accessible external green space and/or leisure spaces or promote shared open space, allotment facilities or recreational facilities for children on site.

Given the limited allocations in TisPlan it is difficult to see to what this policy would actually apply to.