

# Tisbury and West Tisbury Neighbourhood Development Plan



Appendix 9 -Consultation Statement  
January 2019

2017 - 2036



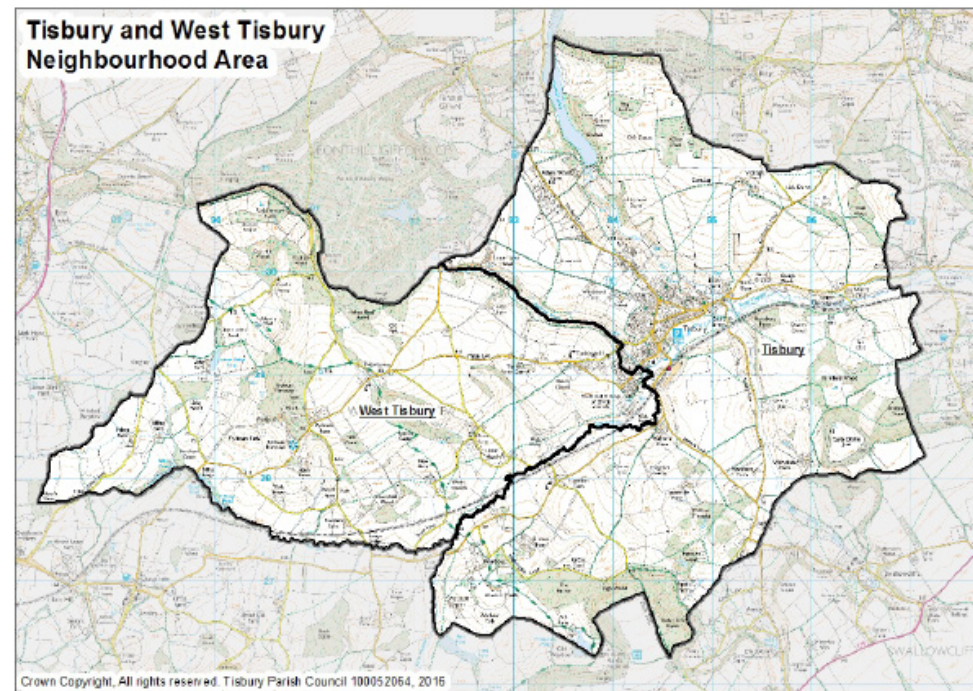
Local Planning Authority: Wiltshire Council

Qualifying Body: Tisbury Parish Council

Relating to the parishes of Tisbury and West Tisbury, Wiltshire

Chair: Janet Amos, Tisbury Parish Council

TisPlan was developed with the commitment and contribution of the Tisbury and West Tisbury Neighbourhood Plan (TisPlan) Steering Group and the local community. With thanks to Locality<sup>1</sup> and the Parish Councils of Tisbury and West Tisbury for their financial support in developing the plan.



Map of Neighbourhood Area (Wiltshire Council)

As part of a move to devolve power more widely in the UK, the Localism Act (2011) invited every local community – as a defined ‘neighbourhood plan area’ - to set out its own views on local planning in a neighbourhood plan, taking into consideration the priorities of residents, local businesses and community groups on what they feel are the important issues for the future of their area. In the case of TisPlan, this area covers the two adjoining parishes of Tisbury and West Tisbury in South West Wiltshire, which was designated by Wiltshire Council in July 2015 (See [Appendix 2 - Tisbury and West Tisbury Neighbourhood Area Designation](#)).

This document sets out the consultation carried out to inform the policies and objectives set out in TisPlan (Submission Version) and the how comments received during the Reg 14 consultation (Pre-Submission draft) have been addressed.

<sup>1</sup> Front Cover Image: TisPlan Community Consultation, July 2014, The Victoria Hall



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# Section 1. Introduction

## 1.1. Scope of the Consultation Report

This Consultation Statement has been prepared to fulfil the legal obligations of the Neighbourhood Planning Regulations 2012. Section 15(2) of Part 5 of the Regulations sets out that a Consultation Statement should:

1. Contain details of the persons and bodies who were consulted about the proposed neighbourhood development plan;
2. Explain how they were consulted;
3. Summarise the main issues and concerns raised by consultees;
4. Describes how these issues and concerns have been considered and, where relevant, addressed in the proposed neighbourhood development plan.

The level of consultation is set out in detail in the reports submitted in support of this Consultation Statement. It is not the intention that this Consultation Statement should replicate what is in these detailed reports (see [Section 1.4](#)).

## 1.2. Aims of TisPlan Consultation

Engaging the community in all aspects of developing a neighbourhood plan is essential so that the plan truly reflects the needs and interests of the local community of local people. With any process to develop community-based plans the range of opinions and different needs are manifold and need to be properly recognised. There needs to be a clear strategy for addressing or acknowledging how these views have been considered in the Submission Version of TisPlan.

The aims of TisPlan's consultation process were to:

- **Be locally-led:** 'front-loading' consultation so that the plan was informed by the views of local people and other stakeholders from the start of the neighbourhood planning process;
- **Give opportunities for steer and direction over the content of the plan:** to ensure that consultation events took place at critical points in the process where decisions needed to be taken;
- **Be representative:** to engage with as wide a range of people as possible, using a variety of events and communication techniques; and
- **Feedback:** to ensure that results of consultation were fed back to local people and available to read (both in hard copy and via TisPlan's website and Facebook events) as soon as possible after the consultation events.

## 1.3. Steering Group Governance

Consultation was undertaken by the TisPlan Neighbourhood Planning Steering Group on behalf of the Parish Councils of Tisbury and West Tisbury, chaired throughout by Janet Amos of Tisbury Parish Council.

The TisPlan steering group has always sought to represent the needs and priorities of the entire community in the plan area, and to support Tisbury's role as a Local Service Centre in the wider Tisbury Community Area.

The steering group has representation from both of the Parish Councils of Tisbury and West Tisbury, as well as local residents. Members of the steering group represented both the parishes of Tisbury (including two parish councillors) and West Tisbury (including two parish councillors). The steering group met at least monthly whilst the plan was being drafted.

The TisPlan steering group also formed working groups, tasked with developing initial policy objectives and reviewing the evidence base for such objectives, including issues arising from consultation activities.

These working groups were in the following areas:

- Housing and the Built Environment
- Transport
- Leisure, Community and Well-being (inc. Education)
- Environment and Energy

The work of the sub-groups was then refined into draft policies which were tested in the later stages of the consultation process. Consultation was undertaken by Tisbury and West Tisbury Neighbourhood Planning Steering Group on behalf of the Parish Councils of Tisbury and West Tisbury. Work involved engaging with the community for more than three years through surveys, public meetings and events.

The Steering Group gathered evidence to inform the objectives and policies in TisPlan between 2014 - 2017, including:

- Meeting local residents at local events
- Engaging with local groups and businesses, both on-line and face-to-face
- Understanding local priorities through a comprehensive questionnaire
- Engaging with statutory bodies
- Reviewing relevant policy and written evidence

The TisPlan steering group worked closely with Wiltshire Council (WC). The Link Officer, Natasha Styles, was invited to attend every steering group meeting and was consulted regularly to advise on issues as they arose and to discuss early drafts of TisPlan.

These were later refined by additional advisory and technical support into draft policies which were tested in the later stages of the consultation process.

## 1.4. How TisPlan Consultation was Carried Out

Work involved engagement with community groups over approximately three years, as well as surveys, public meetings and events. It is estimated that TisPlan's consultation reached over 1000 people directly through engagement at various events and reached every household in some form either by the community questionnaire or through press releases and other information-sharing through local channels.

In order to attract as many local residents as possible, events were publicised in the following ways:

- Press releases in parish magazine (Focus), and local magazines *The Blackmore Vale* and newspaper *Your Valley News*
- Flyers posted in key local venues, including the Parish Council notice board, the Post Office, Tisbury Railway Station and the Library
- Distribution of flyers and face-to-face engagement by TisPlan steering group in the High Street in the days prior to the event, using orange 'TisPlan' balloons to help increase the visual identity of the plan,
- A detailed A3 pull out with a map of the Neighbourhood Area and potential development sites with a summary of the plan's objectives during Reg 14 delivered to every household and distributed across Tisbury village
- Targeted engagement with specific groups and stakeholders.
- Sharing information via the Parish Councils, such as the Tisbury and West Tisbury Annual Parish Meetings.

The landowner of Station Works (St Modwen) has shown great willingness to understand the community priorities for development at the site and has been kept informed throughout the Neighbourhood Plan process.

The evidence base for TisPlan policies is set out in the Evidence Base is listed in [Appendix 1 - TisPlan Evidence Base](#).

A more detailed summary of community contributions made at different stages can be found in the following documents on the TisPlan website [www.tisplan.org.uk](http://www.tisplan.org.uk):

- [Appendix 10 Summary of Consultation feedback \(July 2014\)](#)
- [Appendix 11 Summary of Consultation feedback \(September 2014\)](#)
- [Appendix 12 TisPlan Questionnaire \(December, 2015\)](#)
- [Appendix 13 Analysis of TisPlan questionnaire \(March 2016\)](#)
- [Appendix 14 TisPlan Community Feedback Day Report \(May 2017\)](#)
- [Appendix 15 Analysis of Employment Survey \(Winter 2017\)](#)
- [Appendix 16 Reg 14 Response Form \(July 2017\)](#)

## 1.5. Engaging with Hard-to-Reach Groups

There were no specific groups that were felt to be under-represented throughout the consultation process. Attendance at the engagement events was from a wide cross section of the community that broadly represented the demographic mix of the two parishes.

The only area that was felt to have less involvement than expected was from young people. In order to remedy this, engagement was undertaken specifically through targeted engagement at community wide events, most especially Carnival.

## Section 2. TisPlan Timeline and Key Consultation Events

*Events organised by the TisPlan steering group are indicated in light blue*

TisVis Parish Plan

This plan was commissioned and adopted by Tisbury and West Tisbury Parish Councils. It identified community preferences on a range of topics. The plan was reviewed by Tisbury Parish Council in 2012 and 2014 but lacked statutory weight.

2007

Localism Act

An Act of Parliament that changed the powers of local government in England. The aim of the Act is to devolve decision-making powers from central government to local communities.

2011

TisPlan steering group established

The Steering Group comprises Tisbury and West Tisbury Parish Councils together with local residents to oversee TisPlan evidence gathering, policy writing and community consultation. Wiltshire Council (as the Local Planning Authority) appointed a link officer, who was invited to attend all meetings.

The TisPlan Website [www.tisplan.org.uk](http://www.tisplan.org.uk) was established to share information and updates on the progress of the plan. TisPlan updates were also shared through the Tisbury Parish Council Facebook group – Tisbury Village News.

2013

TisPlan Community Consultation  
St John the Baptist Church Fete

TisPlan Steering Group members met with local residents for the first TisPlan consultation. Orange TisPlan balloons were used to raise awareness of the plan and people had the opportunity to ask questions about the process. Residents were invited to attend the next consultation event in July 2014.

Estimated reach:  
Direct - 100  
Indirect - 500

June 2014

TisPlan Community Consultation  
The Victoria Hall, Tisbury

Local residents were invited to express their opinions on a range of topics affecting the community including: Station Works, Housing, Employment, Energy and the Environment, Travel and Transport, Health & Recreational Services and Education. This was a well attended 'drop-in' event. However, it was noted that few younger (i.e. under 40) residents attended.

Estimated reach:  
Direct - 400  
Indirect - 1000

July 2014

TisPlan Community Consultation  
Tisbury Carnival

Tisbury Carnival is a popular local event and TisPlan had a presence via a manned stall. Simple questionnaires were issued to ask what people liked and disliked about living in the area, and what they wanted to see more or less of.

In particular, younger people were approached for their opinions, as the Victoria Hall consultation had tended to attract the older age groups.

Estimated reach:  
Direct - 100  
Indirect - 1000

Sept 2014

TisPlan neighbourhood area formally designated

An application by Tisbury Parish Council for the two parishes of Tisbury and West Tisbury to jointly develop a neighbourhood plan as the 'neighbourhood area' was approved by Wiltshire Council in July 2015.

July 2015

Wiltshire Council Core Strategy (CS) (2015-2026)

This is a Development Plan Document that sets out the strategic planning framework for the county for the period up to 2026.

A Neighbourhood Plan must demonstrate it is in general conformity with the Core Strategy.

2015

TisPlan Community Consultation Community Questionnaire

After piloting, the TisPlan Community Questionnaire distributed in October 2015. It comprised 22 questions to survey residents on their aspirations for the development of the neighbourhood area. This was delivered personally by volunteers to every household and had an excellent response rate of 48%. The results were shared widely in local media; at presentations to the Annual Parish Meetings and at village events, such as St John's Summer Fete.

An analysis of the questionnaire results was published on the TisPlan website and shared with local residents at the Tisbury Parish Council and West Tisbury annual meetings in May 2016.

Oct 2015

Estimated reach:  
Direct - 2600  
Indirect - 3000

TisPlan Community Consultation Local Businesses and community organisations

Local community groups, landowners and businesses were consulted on their development preferences in the area to assist with policy development.

This period also included engaging with the site owner of the main brownfield site, Station Works, to ensure they were made aware of the strong community preferences for the site, which had arisen from the community questionnaire.

Estimated reach:  
Direct - 30  
Indirect - 200

Oct 2015-Nov 17

TisPlan Community Consultation St John the Baptist Church Fete

TisPlan Steering Group members ran an informal feedback stall at this event to inform local residents of the findings from the questionnaire, the progress in developing the plan and give people the opportunity to raise any questions.

Estimated reach:  
Direct - 60  
Indirect - 500

June 2016

Policy design, review and evidence gathering

As well as reviewing existing local planning documents, such as the Core Strategy and other important national, county and local documents, the TisPlan steering group also commissioned specialist professional support to inform policy development.

These included a Strategic Environmental Assessment and a review of potential sites for development (both carried out by AECOM as part of the Locality Technical Support package). Statutory consultees were consulted as part of this process.

2015-17



TisPlan Community Consultation  
Community Feedback Day

A 'working draft' of TisPlan was released on 5th May 2017, ahead of a TisPlan Feedback Consultation day at the Nadder Centre on 6th May to use as a discussion point to obtain community feedback on refining the plan (e.g. any key omissions or factual errors) before the Reg 14 formal (local) consultation. More than 80 local people gave their helpful comments in two separate sessions which were reviewed carefully by the steering group to improve the Draft Plan before formal (Reg 14) consultation in July 2017.

The working draft was available on the TisPlan website for people to read and familiarise themselves with the plan's objectives and comment as they wished.

Estimated reach:  
Direct - 80

May 2017

TisPlan Community Consultation  
'Reg 14'

The TisPlan Pre-Submission Draft (Reg 14) was available for the local community consultation during the consultation period 10th July - 8th September 2017. The period was extended to eight weeks to give sufficient time for people to comment, given that the consultation was primarily during the Summer holiday period.

Every household received a comprehensive brochure outlining TisPlan's policies and objectives and a map of proposed allocated sites in the neighbourhood area. Display boards were situated at Nadder Centre and a TisPlan open day was held at the Parish Council Reading Room on 22nd July 2017.

Feedback received on the Reg 14 version was used to further refine the TisPlan policies, to be in general conformity with the Local Plan as well as meeting other statutory requirements and local needs. There were 44 respondents, whose comments are summarised in Section 3.3, together with how TisPlan was revised based on these comments.

Estimated reach:  
Direct - 33  
Indirect - ~200

July - Sept 2017



TisPlan Community Feedback Day, May 2017, The Nadder Centre

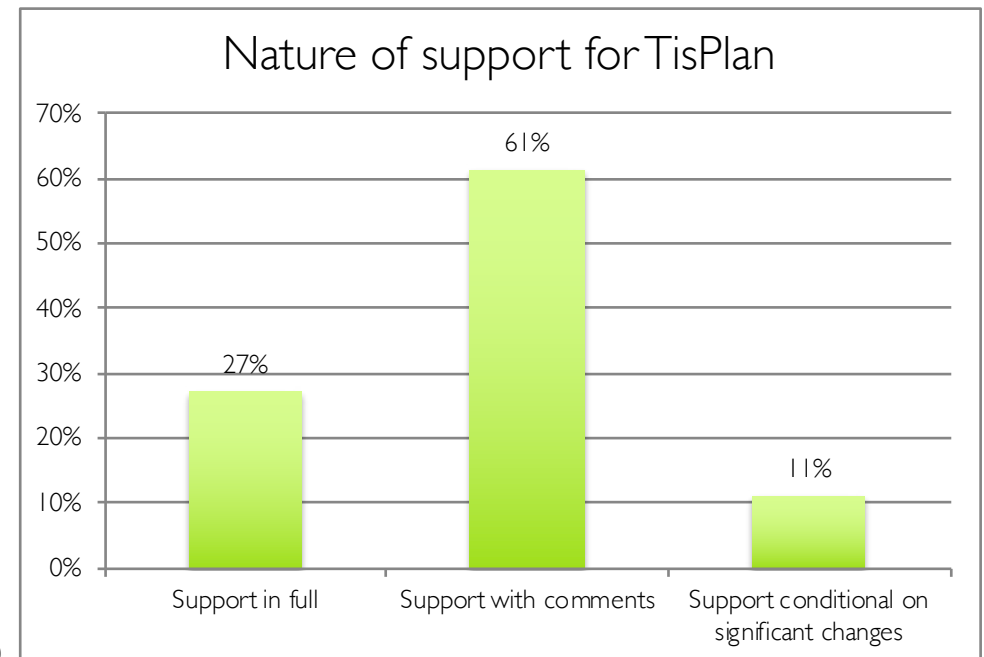
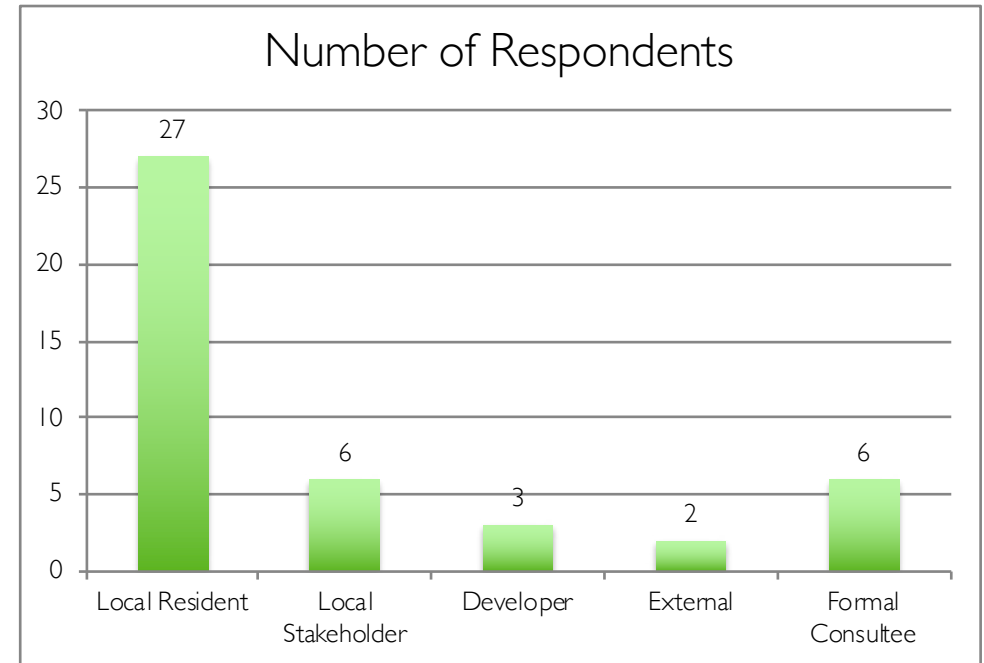
## Section 3. Reg 14 Consultation

### 3.1. Reg 14 Summary Analysis

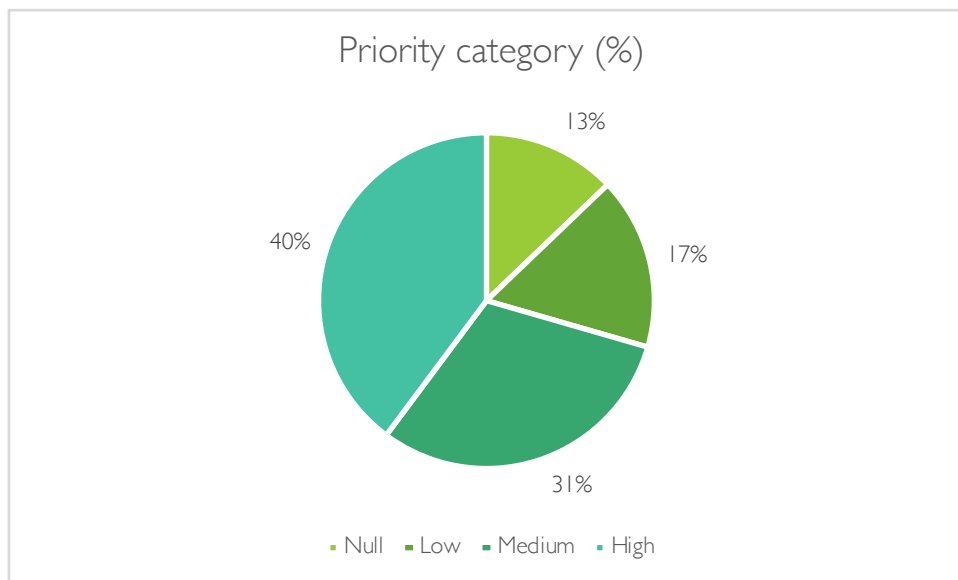
In total 44 consultees responded to the Reg 14 consultation, mainly via an online Reg 14 consultation form. During the analysis of the Reg 14 responses, each response was catalogued and prioritised according to the type of comment received, the stakeholder type and extent of their support for TisPlan. The total number of individual comments was 319.

The names of organisations responding to Reg 14 consultation are listed in [Appendix CS\\_A](#) in this document. For data protection (GDPR) reasons the names of individual respondents are not listed.

Most respondents supported TisPlan, either in full - with no additional comments - or pending further comments.

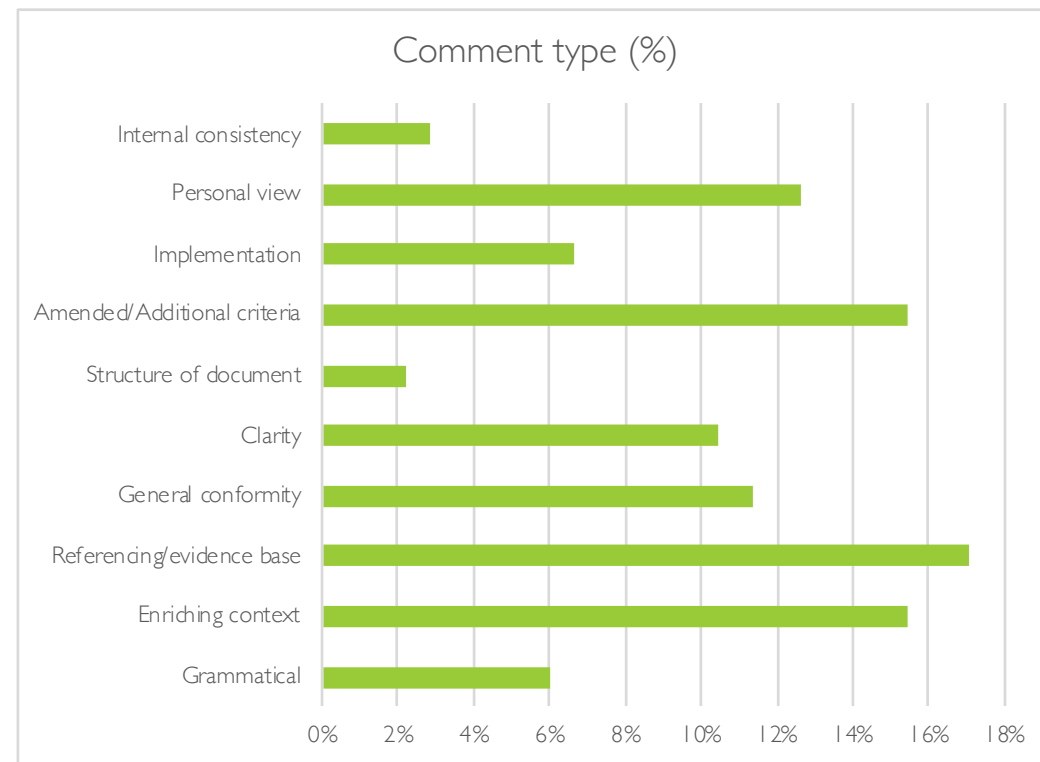


Comments ranged from simple grammatical errors and internal consistency to more substantive comments around general conformity, development management and additional/amended criteria (implementation of proposed policies) and the requirement to improve the evidence base around particular sections. The range of comments is summarised in the chart to the right.



40% of comments were deemed of a high priority and 31% of a medium priority in terms of ensuring general conformity. These were carefully reviewed by the steering group. A detailed summary of the more substantive and high priority comments received during the Reg 14 consultation period are listed in the following section.

Generally supportive comments have not been documented in Section 3.3. (Summary of Contributions Made during Reg 14) below, but some positive feedback is documented in extracts in the following pages.



Revisions to the plan based on these comments took place over the period November 2017 - March 2018. A revised draft TisPlan was submitted for a Health Check which was conducted by IPE in July 2018 with the support of Locality Technical Assistance. The purpose of this report was to confirm whether the plan was internally consistent as well as conforming to the basic conditions. TisPlan received an overall successful health check. Any additional comments to improve the plan have been included in the Submission version of TisPlan (See [Appendix 19 - TisPlan Health Check](#)).

## 3.2. Examples of Positive Feedback (Reg 14)

Whilst the TisPlan steering group recognise there were many important comments from the Reg 14 consultation to improve the plan, there was also some positive feedback from consultees, recognising the hard work of the Steering Group in developing the Pre-Submission (Reg 14) Version of TisPlan.

*“The plan represents a considerable amount of work involving all interests in the local community. It encompasses a great range of issues and pulls them together. The plan sets out the issues it aims to tackle and for each issue there are objectives, policies and tasks.*

*The plan also contains a clear vision for the future. It has clearly been prepared positively with a proactive attitude to achieving the desired outcomes of Tisbury village and its rural surrounding area. It represents a well drafted and considered plan...The draft plan addresses relevant issues identified for the Tisbury community area in paragraph 5.146 of the Wiltshire Core Strategy and meets the requirements of Core Policy 27 (Spatial Strategy: Tisbury Community Area)”.  
(Statutory Consultee R42, comment number 19)*

*“Infrastructure Provision - About time someone dealt with this aspect which has been lacking for previous developments in Tisbury.” (Local Resident R31, comment 125).*

*“We are pleased to see how much the area’s distinctive historic environment is valued by its community and reflected in the regime of policies and Action Points set out .*

*It therefore only remains for us to congratulate your community on the preparation of its Plan and wish it well in its journey to completion.  
(Statutory Consultee R41, comment 278)*

*“Many congratulations indeed on the pre-submission (Reg) 14th version of the Tisplan (the Tisbury and West Tisbury Neighbourhood Development Plan) 2017-2030), which seems to be an excellent and well thought out document in many ways.” (Local Stakeholder R39, comment number 274)*



## 3.3. Summary of Contributions Made during Reg 14 Consultation and Subsequent TisPlan Amendments

*A number of detailed comments were received; comments have been included in the words of those who responded to the fullest possible extent but have been summarised for the sake of brevity in places.*

*Comments of a similar nature have been grouped where appropriate with a clear indication of respondent type, respondent unique id and comment number.*

*The order of the sections is structured according to the revised TisPlan Submission version (and not the Reg 14 version). To comply with GDPR, any information identifying individual persons has been removed and a stakeholder type is indicated.*

### General

Section (Reg 14 title): General

Sub-title: General conformity (Development targets)

Policy number (Reg 14 version):

Reg 16 policy number: Section 1.2

Comments received from: Developer (R32, comment 269)

Summary of comments/concerns

Extending the plan period from the current 2015-2026 WC Core Strategy (CS) period to 2030 is not based on robust evidence used to inform development targets e.g. Functional Economic Market Area Assessment (FEMAA) or the Wiltshire and Swindon Strategic Housing Market Assessment (SHMA). As per the WC Cabinet report dated 20 June 2017 entitled "Consideration of the Wiltshire Housing Site Allocations Plan", housing targets for Tisbury have actually decreased. This leaves a shortfall for the wider Community Area (with a residual target of 149 dwellings as of June 2017). The land south of The Avenue is suitable, available and deliverable to meet any additional targets set by TisPlan over the plan period for

Tisbury and the wider Community Area. An additional housing target is required to extend into the next CS period, e.g. a pro rata annual rate of development at a minimum. This must not contradict the strategic planning projections of WC. (Developer - R32, comment 269).

How comments/concerns addressed by Submission Version of TisPlan

At the time of Reg 14 it should be noted that the plan period was provisionally proposed as 2017-2030. This has since been adjusted to comply with the next WC CS period 2027-2036, an approach endorsed by the WC Link Officer. Indeed, newer NP groups are encouraged to do the same. For the current CS period, most of the housing development targets have been met (mostly by the Wyndhams Estate development on Hindon Lane), out of an initial target of 200 for the Tisbury area. A target of 23 remains as of November 2018. The remaining target for the Community Area is still to be satisfied and is being considered by neighbouring settlements.

The FEMAA and SHMA for the next CS period are yet to be determined. However, WC has predicted a slower rate of growth for the Salisbury Housing Market Area (which includes the Tisbury Community Area) due to a significant availability of land elsewhere in Wiltshire. The principal settlements and towns are to remain growth areas. For additional employment sites into the next CS period, TisPlan has created policies to encourage employment at mixed development sites at Station Works and the former Magistrates Court.

Development of the land south of The Avenue runs contrary to both the community's strong preferences and the policies of TisPlan. Given the availability and suitability of brownfield sites (either immediately or which may become available into the extended TisPlan period) – notably Station Works which could deliver up to 60 dwellings - TisPlan is confident that greenfield development is not required. This approach is supported by WC and the prioritisation of brownfield sites is encouraged by the WC CS (2015-2026).

TisPlan has created enabling policies for sustainable development in the area, recognising some sites may be phased into the future.

Section (Reg 14 title): General

Sub-title: General conformity (Development targets)

Policy number (Reg 14 version):

Reg 16 policy number: Section 1.2

Comments received from: Statutory Consultee (R42, comment 280; R43, comment 301)

Summary of comments/concerns

We have concerns around housing projections if these exceed the current CS allocation of 200 due to phosphate loads and adverse impacts on meeting the targets set in the Nutrient Management Plan (NMP) (Statutory Consultee - R43, comment 301).

Housing numbers and a housing trajectory needs to be provided so this can be included in the WC's phosphate model before TisPlan is adopted (Statutory Consultee - R42, comment 280).

How comments/concerns addressed by Submission Version of TisPlan

A Habitats Screening for Reg 14 by WC suggested that TisPlan would require a further screening at the time of examination of the plan to ensure that development doesn't compromise the targets set in the NMP. Text proposed by WC on recent updates of the modelling of the NMP has been incorporated into Policy HNA.3 (Managing Water in the Environment) and supporting text; additional offsetting measures have been included in Policy BL.6 (Infrastructure) and Policy BL.4 (Station Works).

WC has indicated that housing numbers need only be provided for larger site allocations and a maximum number of 60 dwellings has been set in Policy BL.7. A number of sites were assessed by the AECOM (July 2017) site assessment report. TisPlan broadly supports the conclusions of the report, with the exception that:

- There should be fewer dwellings at Station Works (site assessment proposed 89 dwellings). The total number of dwellings has been reduced to a maximum of 60, as the higher figure does not facilitate community preferences: ie mixed development of business units, housing, station parking, pedestrian access into Tisbury and Network Rail's anticipated expansion of the dualling of the track and land required for reinstatement of the second platform. The higher number of 89 may also have caused concerns regarding the WC phosphate modelling. Therefore, the lower figure of 60 is proposed.
- The number of dwellings proposed at the former Magistrates' Court (site assessment proposed 48 dwellings) should be fewer, in order to facilitate future business expansion as part of a mixed development.
- The greenspace on Churchill Estate (3 proposed dwellings) has not been allocated as 43% of people who responded to Qu. 9 of the TisPlan questionnaire strongly objected to development of this site. It is a very small site and is valued as an informal green space.
- The land on the former sports centre (site assessment proposed 9 dwellings): this is allocated in TisPlan for community development, including accommodating St John's School future expansion plans, where relevant.

It is also anticipated that other brownfield sites may become available during the plan period.

Section (Reg 14 title): General

Sub-title: General conformity

Policy number (Reg 14 version): Section 2. HNA, Policy HNA.1 and BL.4

Reg 16 policy number: Appendix 8 - Basic Condition Statement; Section 1.4

Comments received from: Statutory Consultee (R43, comment 302).

Summary of comments/concerns

Additional text on protecting bats within or adjacent to a SAC as provided by the WC Habitats Officer is required, as suggested by the conclusions of the Habitats Regulation screening (Chilmark Quarries SAC). This supporting text needs to be

included in both policy specific areas and as upfront text (Statutory Consultee – R43, comment 302).

How comments/concerns addressed by Submission Version of TisPlan

The emphasis on the protection of bat species and the SAC is strongly emphasised in the relevant sections of the plan, integrating suggested text by the WC Habitats Officer where appropriate:

- HNA.1 (formerly CT.2) supporting text and policy
- BL.7 (formerly BL.4) supporting text and policy

Section (Reg 14 title): General

Sub-title: General conformity

Policy number (Reg 14 version): N/A

Reg 16 policy number: N/A

Comments received from: Developer (R31, comment 3)

Summary of comments/concerns

Updates by SoS to PPG (Feb 16) suggest a timeframe for proposed changes when reviewing a plan. Care must be taken to avoid a conflict with other policies in a development plan. NDPs should not restrict housing development or other settlements from being expanded (Developer - R31, comment 3).

How comments/concerns addressed by Submission Version of TisPlan

Pre-submission (Reg 14) to Submission version (Reg 16) amendments do not qualify as a 'review' of an NDP. TisPlan is not against housing development and welcomes redevelopment of brownfield sites for housing and employment uses. TisPlan seeks modest growth, in line with the WC CS vision statement for Tisbury (CP27), targets that have subsequently been downgraded. There is no policy which aims to restrict development in other settlements. Indeed, the steering group has

ensured ongoing dialogue and consultation with the neighbouring parishes during the production of TisPlan.

Section (Reg 14 title): General

Sub-title: General conformity

Policy number (Reg 14 version): N/A

Reg 16 policy number: Section 1.5, Policies BL.3, BL.4, EB.1 and EB.2; Appendix 8 - Basic Condition Statement

Comments received from: Developer (R31, comment 3)

Summary of comments/concerns

TisPlan misses economic growth as a driving force for development, in line with the WC CS (Developer - R31, comment 3).

How comments/concerns addressed by Submission Version of TisPlan

TisPlan's policies aim to promote and protect employment opportunities in the area. As the WC CS recognises, economic growth - whilst a driving force - must be balanced with other considerations such as heritage, social well-being, encouraging net gains to biodiversity, protecting landscapes and climate change to name a few core planning principles in the CS (see *Appendix 8 - Basic Conditions Statement* for more detail).

The need to support the retention of Tisbury's thriving and strongly independent High Street is noted in Section 1.1 of the plan whilst section 1.2 emphasises that brownfield sites can deliver both housing as well as supporting local enterprise through mixed development.

Section (Reg 14 title): General  
Sub-title: General conformity  
Policy number (Reg 14 version): N/A  
Reg 16 policy number: Section 3 BL  
Comments received from: Developer (R32, comment 14)

## Summary of comments/concerns

TisPlan appears to aim for 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 (Developer – R32, comment 14).

## How comments/concerns addressed by Submission Version of TisPlan

TisPlan has sought to be proactive to address a broad range of needs in the community and does not seek to achieve an “absolute minimum” for housing. An assessment of available sites, analysis of the community’s preferences and the need to conserve the character and heritage of the area have been driving forces for the plan. TisPlan aims to maximise the potential for development on brownfield sites for both housing and employment, not least to encourage lower-cost housing and to cater for increasing numbers of older people in the plan period.

Section (Reg 14 title): General  
Sub-title: Evidence base/ compliance  
Policy number (Reg 14 version): N/A  
Reg 16 policy number: Appendix 8 - Basic Condition Statement; Section 1.4  
Comments received from: Statutory consultee (R44, comment 16)

## Summary of comments/concerns

TisPlan requires a Basic Conditions Statement to demonstrate how the policies are compliant with the conditions set out in national policy and the CS. It is important to reference SEA upfront in the plan (Statutory Consultee – R44, comment 16).

## How comments/concerns addressed by Submission Version of TisPlan

A Basic Conditions Statement is not required for Pre-submission neighbourhood plans (Reg 14). Section 1.4 of the TisPlan Submission version explicitly signposts readers to Appendix 8 Basic Conditions Statement which details:

1. NPPF planning principles and relevant TisPlan policies
2. How TisPlan promotes sustainable development
3. How TisPlan is compliant with the WC CS
4. Compliance with other EU policies

The SEA carried out by AECOM (July 2017/revised January 2019) is clearly referenced in the HNA section of the plan (policy HNA.1).

Section (Reg 14 title): General  
Sub-title: Amended/ Additional criteria  
Policy number (Reg 14 version): Policies HNA.1, HNA.3, BL.2, EB.2  
Reg 16 policy number: Appendix 8 - Basic Condition Statement; Section 1.4  
Comments received from: Statutory Consultee (R44, comment 21-3)

## Summary of comments/concerns

The plan should refine rather than repeat existing national or WC CS policies. Policies could be enhanced with important views within/in/out the plan area (Statutory Consultee R44, comment 21-3).



How comments/concerns addressed by Submission Version of TisPlan

TisPlan has sought to go beyond extant policies by adding local relevance, for example:

CT.1 (now HNA.1): this policy now includes reference to the River Nadder SAC; additional design and landscape impact are now addressed in

BL.4 (Design and Landscape) notably through sensitive design and protection of the skyline and the protection of views within/without, which are detailed in an accompanying Appendix 4 – Design and Visual Impact. Specific visual impact in the Conservation Area is detailed in HNA.2 (The Conservation Area)

CT.3 (now HNA.3): this policy has been expanded to include wider water management in the environment in addition to flooding. As stated above it includes text suggested by WC on the NMP and on alternative sewage impact.

EM.2 (now EB.2): this policy seeks to extend CP35 to all sites under 0.25ha to protect existing employment sites from conversion to residential.

Section (Reg 14 title): General

Sub-title: Clarity

Policy number (Reg 14 version): Policies HNA.1, HNA.3, BL.2, EB.2

Reg 16 policy number: Appendix 8 - Basic Condition Statement; Section 1.4

Comments received from: Statutory consultees (R44, comment 22, 107)

Summary of comments/concerns

Reasoning/justification for policies should be within supporting text, not policies. Policies should be clear to avoid any confusion (Statutory Consultee – R44, comment 22, 107).

How comments/concerns addressed by Submission Version of TisPlan

Any reasoning has been removed from all policies and introductory text strengthened, where relevant. Every effort has been made to delete or clarify any ambiguous policy wording.

Section (Reg 14 title): General

Sub-title: Structure of document

Policy number (Reg 14 version): Section 2. HNA, Policy HNA.2

Reg 16 policy number: Appendix 8 - Basic Condition Statement; Section 1.4

Comments received from: Statutory consultee (R44, comment 25, 197); Local resident (R29, comment 207)

Summary of comments/concerns

Move the Countryside and Environment before Buildings to give the reader more context (Statutory consultee (R44, comment 25, 197).

There should be a separate section on the AONB and a separate policy on landscape character referring to the AONB Historic Landscape Characterisation (Local resident - R29, comment 207).

How comments/concerns addressed by Submission Version of TisPlan

These suggestions were welcomed and make the countryside section more prominent. The Submission version has changed the Countryside and Environment (Section 5 in the Pre-Submission Version) to the first themed section entitled 'Historic and Natural Assets' (Section 2). This change also incorporates the suggestion to integrate historic and natural assets together, in line with the NPPF definition of environmental sustainability and with clearer reference to the AONB Historic Landscape Characterisation.

Section (Reg 14 title): General

Sub-title: Enriching context, About the TisPlan area, Buildings (BL.1)

Policy number (Reg 14 version): Section 1.1 and Section 1.3

Reg 16 policy number: Appendix 8 - Basic Condition Statement; Section 1.4

Comments received from: Statutory Consultee (R44, comment 25, 197)

## Summary of comments/concerns

There is no mention of the AONB's statutory role and duty of regard 'to conserve and enhance' the AONB or reference to AONB guidance. Add more on the constraints and aspirations of the AONB Management Plan (Statutory consultee - R44, comment 25, 197).

## How comments/concerns addressed by Submission Version of TisPlan

Section 1.1 notes the statutory duty of the AONB, the Management Plan and associated guidance. The overall TisPlan vision in Section 1.3. highlights the importance of landscape, historic character and the area's predominantly rural qualities. TisPlan's own contribution to the character of the AONB has been fundamental to the approach to plan-making.

Section (Reg 14 title): General

Sub-title: TisPlan vision

Policy number (Reg 14 version): TisPlan vision

Reg 16 policy number: TisPlan vision

Comments received from: Statutory consultee (R44, comment 29)

## Summary of comments/concerns

Reference should be made to the conservation and enhancement of local distinctiveness, sense of place and local character as a key aspect of sustainable development (Statutory consultee - R44, comment 29).

## How comments/concerns addressed by Submission Version of TisPlan

The TisPlan vision has incorporated the protection of landscape, environment and heritage assets in the AONB and Policy HNA.2 and Policy BL.4 actively seek to enhance local distinctiveness and sense of place. The AONB Management Plan is referenced as one of TisPlan's most important and relevant underpinning core documents.

Section (Reg 14 title): General

Sub-title: Sustainable Development

Policy number (Reg 14 version): N/A

Reg 16 policy number: Appendix 8 - Basic Condition Statement

Comments received from: Developer (R32, comment 46)

Comments received

Clarify what 'sustainable development' means and how the three strands have been explored holistically. More attention should be paid on the social aspects of sustainability, particularly health (Developer - R32, comment 46).

## How comments/concerns addressed by Submission Version of TisPlan

An analysis of the contribution of individual TisPlan's policies towards sustainable development (as defined in the NPPF, 2012) is detailed in Appendix 8 - Basic Conditions Statement.

Section 6. Leisure, Community and Well-being (LCW) includes policies to promote well-being and protect community assets that contribute to Tisbury's village character and active community groups. Consultation with local healthcare providers indicated that capacity for growth exists within their existing resources.

Implementing the policy of TR.5 Sustainable Transport would also improve health and well-being. Moreover, social well-being ought to be improved by enacting policies to ensure a broad mix of housing for a range of ages and incomes in the community, encouraging diversity in the community.

Section (Reg 14 title): General

Sub-title: General conformity/ Evidence base: Site Assessment

Policy number (Reg 14 version): N/A

Reg 16 policy number: Appendix 6 – TisPlan site assessment

Comments received from: Developer (R32, comment 82); Local resident (R15, comment 73).

## Comments received

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 Developer (R32, comment 82).

Ridley's Field at top of Tisbury/Tuckingmill should have been included in the housing appraisal (Local resident (R15, comment 73).

## How comments/concerns addressed by Submission Version of TisPlan

The approach undertaken to the site appraisal is based on the Government's National Planning Practice Guidance (Assessment of Land Availability) published in 2014 (with ongoing updates), which contains guidance on the assessment of land availability and the production of a Strategic Housing Land Availability Assessment (SHLAA) as part of a local authority's evidence base for a Local Plan.

Although a Neighbourhood Plan is at a smaller scale than a Local Plan, the criteria for assessing the suitability of sites for housing are still appropriate. This includes an assessment of whether a site is suitable, available and achievable. The TisPlan steering group reviewed the report in tandem with other core evidence and community preferences to determine the suitability of these sites to be carried forward into the plan; for an analysis of a broader sustainable development approach see Appendix 8 – Basic Conditions Statement.

Ridley's Field was not put forward for site assessment during the call for sites in winter 2015 and it was not put forward by the steering group due to adverse landscape impact and development at this location would result in the merging of Tisbury and Tuckingmill as distinctive settlements.

## Historic and Natural Assets

Section (Reg 14 title): Countryside and Environment

Sub-title:

Policy number (Reg 14 version): CT Background and rationale and Vision

Reg 16 policy number: HNA. Background and rationale

Comments received from: Statutory consultee (R44, comment 199, 209); Statutory consultee (R35, comment 203); Local resident (R29, 206-7); Local Resident (R26, 205).

## Comments received

Clarify the location of Landscape Biodiversity Area 10 of the Landscape Biodiversity Area 10 of the Landscape Conservation Framework - Warminster and the Vale of Wardour Statutory consultee (R44, comment 199).

Some agricultural land within the plan area (e.g. the Oddford Valley) is of poor agricultural value but needs sympathetic management urgently (Local Resident – R26, 205).

Overall TisPlan Vision – this should read “conservation and enhancement” of the AONB rather than “protection” to be in line with national policy (Statutory Consultee - R44, comment 209).

Include natural beauty and outstanding landscapes in vision statement. The vision should reference historic environment as well as biodiversity (Local resident (R29, 206-7).

## How comments/concerns addressed by Submission Version of TisPlan

A map has been included of the Landscape Biodiversity Area 10, Warminster and the Vale of Wardour. An action point for improving management of the Oddford Valley has been included for HNA.1

The importance of reducing the impact of lighting on bats has also been included in Policy HNA.1.

Conserve and enhance rather than protection have been changed throughout.

The HNA vision includes reference to natural and historic assets as well as landscapes and natural beauty specifically.

Section (Reg 14 title): Countryside and Environment

Sub-title:

Policy number (Reg 14 version): CT.1

Reg 16 policy number:

Comments received from: Statutory Consultee (R44, comment 211,13); Developer (R31, comment 212); local resident (R29, comment 209). (Statutory Consultee - R44, comment 209); (Local resident (R29, 206-7); Statutory consultee (R44, comment 197), Local resident (R29, comment 207).

Comments received

Whilst the aspirations of the policy are noted, great weight with regards to development and the AONB are already adequately dealt with through the requirements of the Framework. The application of these requirements will therefore be taken into consideration through the development management process when determining planning applications. As such, this policy adds nothing further to the requirements of national policy and therefore should be deleted (Developer - R31, comment 212),

Be more specific; say what it means for the TisPlan area. Omit date of management plan to future proof (Statutory Consultee - R44, comment 211,13).

Ensure the conservation of its landscapes (Local Resident - R29 - comment 209).

I suggest that you have a separate section and policy on local landscape character and a separate section and policy on the AONB. The former should provide a statement on the local landscape character and refer to the relevant areas/types

within the AONB Historic Landscape Characterisation [corrected] and the most up to date county/district Landscape Character Assessment by Salisbury District Council (SDC) (Statutory consultee - R44, comment 197, Local resident (R29, comment 207).

How comments/concerns addressed by Submission Version of TisPlan

A separate policy on landscape and visual impacts is now included in the Housing and Buildings section which refers to vistas in the Landscape Character Assessment (SDC) that should be protected from development.

Section (Reg 14 title): Countryside and Environment

Sub-title:

Policy number (Reg 14 version): CT.2

Reg 16 policy number: HNA.1

Comments received from: Statutory Consultee (R43, comment 313).

Comments received

Two European sites could potentially be screened into this HRA; the River Avon SAC and Chilmark Quarries SAC.

The whole of the neighbourhood plan area falls within 6km of core roosts [for bats] at Chilmark Quarries SAC and Fonthill Grottoes SSSI.

This SAC is not identified in the NP's Strategic Environmental Assessment.

Policy BL.4 – Chilmark Quarries SAC

This policy makes comprehensive redevelopment of the Station Works a priority for the plan. The site comprises brownfield land lying within the rural corridor of the River Nadder and could therefore potentially support SAC bat species. Development may lead to the loss or modification of buildings which the bats use for roosting and disrupt flight routes through removal of vegetation or installation



of new lighting. The SAC therefore represents a constraint to development and I therefore recommend this is recognised in the wording of the policy (Statutory Consultee - R43, comment 313).

How comments/concerns addressed by Submission Version of TisPlan  
The suggested text on Chilmark Quarries SAC and the potential for adverse impacts on bat species is noted in supporting text in HNA.1 and BL.7 to ensure this is made upfront as a general context and for potential development at Station Works.

Section (Reg 14 title): Countryside and Environment  
Sub-title:

Policy number (Reg 14 version): CT.3

Reg 16 policy number: HNA.3

Comments received from: Statutory Consultee (R42, comment 291, 295-6); Statutory Consultee (R43, comment 292); Local resident (R27, comment 219); Local resident (R25, comment 217-8); Local resident (R19, 216); Local resident (R17, comment 215); Local resident (R11, comment 202); Local resident (R3, comment 222)

Comments received

The River Avon SAC pp.5-7

There are four key means by which development can affect the special features of this designated site:

1. direct physical effects on the banks and river channel itself;  
The SAC designation only extends into a small part of the neighbourhood plan area at Upper Chicks Grove and therefore the scope for causing harm through item 1 above is limited and most appropriately dealt with at the planning application stages as and when development arises here.
2. surface water runoff and groundwater pollution during the construction phase;  
The risks of pollution arising through item 2 are generally limited to development sites which lie relatively close to the SAC designation and is most appropriately addressed at the planning application stages when details of specific developments

are known.

3. increased phosphate discharges from sewage treatment works or package treatment;

Plants

[and the impact arising from Station Works]

The modelling in a nutrient management plan (NMP) for high phosphate level management in River Avon SAC assumes that 200 dwellings will be delivered at Tisbury up to 2026 and so far, the model only takes account of development which will discharge to Tisbury sewage works. Although the River Avon SAC is recognised in the NP's Strategic Environmental Assessment, the specific implications of the NMP and the potential constraints it imposes on growth in the catchment are not raised. Housing numbers and a housing trajectory needs to be provided and included in the Council's phosphate model before the plan is adopted. (Statutory Consultee – R42, comment 291).

This plan should be re-screened before it is adopted. Provided that the proposed housing numbers do not compromise the River Avon SAC NMP and the above recommendations for additional wording are incorporated, it should be possible for the plan to be screened out of an appropriate assessment assuming no new significant changes are introduced to the policy proposals (Statutory Consultee – R43, comment 292).

Within the pre-amble of CT3 at para 3 it is not clear what flood categories B and A are. A definition of these would be helpful to provide clarity. To be in general conformity with the NPPF at the end of the policy it should be clarified that 'Where development is felt necessary proposals should meet the requirements of the NPPF and NPPG' (Statutory Consultee - R42, comment 295-6).

Any future development should include a review of the capabilities and capacity of the sewage treatment facility opposite the burial ground. I'm not sure whether this should also feature as part of the flood risk considerations: it is very close to the River Nadder and could be in the flood plain area (Local resident (27, comment 219).

There is no doubt as to the extent of public anxiety that has been raised by the proposal to develop the Avenue, and the fierce reaction that could be expected if development were permissible as a result of an omission from the Development

Plan. I urge you to include in the Development Plan an unambiguous statement of the community's commitment to the preservation of these fields as an open space (Local Resident – R25, comment 218).

The fields in question are a vital asset to the village and a hugely valuable amenity for the whole community. The fact that these are neither parks nor play grounds, but agricultural lands has the effect of bringing the countryside right into the heart of the village and is a fundamental component of the village's rural character. Their contribution to defining the character of the village is as great, or greater, than that of any listed building or even of the conservation areas, and their preservation needs to be given the same level of priority (Local Resident – R25, comment 217).

Include conservation of barn owls, otters, herons, etc.; prevent floodwaters at risk of being pushed into other areas of the village post-development (Local Resident, 11 – 202).

TisPlan should explore in depth the EA's recommendation of a Conservation Management Plan (CMP) (Local resident (R3, comment 222).

How comments/concerns addressed by Submission Version of TisPlan

The potential impacts on the River Nadder SAC are included in the supporting text in policy HNA.3. Criteria to consider alternative sewage and foul water is included in the widened scope of policy HNA.3 'Managing Water in the Environment' as well as in policy BL.7 Station Works. A maximum number of 60 dwellings is included in Policy BL.7 on Station Works. The need for an environmental impact assessment and site remediation to the satisfaction of Wiltshire Council's Environmental Health Team and the Environment Agency has been added to development constraints and mitigation in the supporting text of Policy BL.7. Flood risk categories are included in the supporting text for HNA.3.

Strengthened text within the policy on the community's wish to protect the water meadows alongside The Avenue is included. The land adjacent to the Avenue is a fundamental and integral part of the rural character of Tisbury and should therefore

not be developed due adverse visual, biodiversity, flooding and well-being impacts which run counter to the principles of the AONB Management Plan. The area also forms part of the River Nadder Special Area of Conservation and is a strong natural feature of the area enjoyed by residents and visitors alike. The community is committed to the preservation of these fields as an open space, indicated by responses in the TisPlan questionnaire. Recent proposals for development on the south side of the fields by the Avenue were strongly resisted by the community.

Other species not listed which may be impacted by development along The Avenue have been included. An action point to explore the EA recommendation for a CMP is now included.

## Buildings

Section (Reg 14 title): Buildings

Sub-title: General conformity

Policy number (Reg 14 version): BL.1

Reg 16 policy number: BL.1

Comments received from: Statutory Consultee (R44, comment 62); Developer (R32, comment 61)

Comments received

The overall housing needs are not well defined and open to definition (Statutory Consultee – R44, comment 62).

Policy BL.1 is supported in principle; however, it does not say where these types of housing would be acceptable (Developer - R32, comment 61).

How comments/concerns addressed by Submission Version of TisPlan

Policy BL.1 Providing a Broad Mix of Housing has been amended to clarify that affordable housing is one of many different categories of housing that should be provided to meet a broad mix of housing needs. In particular, proposals should indicate how they have addressed priority demand dwellings highlighted in the TisPlan questionnaire of affordable housing, low-cost and older people's accommodation. NB: starter homes are now included within the revised definition of affordable housing under the updated NPPF. See earlier comment on broad agreement of sites assessed in Appendix 6 – TisPlan Site Assessment Report.

Section (Reg 14 title): Buildings

Sub-title:

Policy number (Reg 14 version): BL.2

Reg 16 policy number: BL.2

Comments received from: Statutory Consultee (R42, comment 288); Local resident (R18 comment 67); Developer (R31, comment 68); Developer (R32, comment 69);

Comments received

TisPlan should not seek to extend the definition of affordable housing beyond the current NPPF definition of affordable housing. Any inclusion of starter homes should be included in addition to criteria on affordable housing (Statutory Consultee - R42, comment 58).

The policy is a non-land use policy and should not feature within the plan, rather it should be an appendix alongside other non-land use policies (Developer – R31, comment 68).

The WC Allocations Policy already includes criteria on local connection and TisPlan should not duplicate these criteria (Statutory Consultee - R42, comment 288).

The criteria need reviewing for consistency e.g. what should happen if the preferred criteria cannot be fulfilled (Local resident - R18 comment 67).

How comments/concerns addressed by Submission Version of TisPlan

TisPlan has embraced the WC allocations criteria that emphasise a local connection to the parish, but also added to this by extending 'local connection' criteria to neighbouring towns and parishes before cascading to Wiltshire-wide. In addition, any development gain arising from new affordable housing should be reinvested for new affordable dwellings in the plan area.

Section (Reg 14 title): Buildings

Sub-title: General conformity

Policy number (Reg 14 version): BL.3

Reg 16 policy number: BL.3

Comments received from: Developer (R31, comment 77, 78); Developer R32, comment 79-81). Statutory consultee (R42, comment 84); Statutory Consultee (R44, comment 318);

Comments received

The prioritisation of brownfield sites is not consistent with the NPPF, which only states that brownfield sites should be used effectively. The site assessment did not mention that greenfield sites should be dismissed.

Brownfield development is only one aspect in determining planning applications, other aspects of sustainability - economic, social and environmental - are also equally important.

It appears that the redevelopment of brownfield land has been championed above other sustainable development criteria, rather than as one (weighted) criterion 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.

It is unclear what 'limited development' and proposed allocation of development sites means in practice. As written, the policy is unclear on its application and should be amended to Policy BL3 – Development on Brownfield sites.

Need to more clearly define the AONB guidelines on development siting. Clarify 'commercial use should be sensitively planned' means.

How comments/concerns addressed by Submission Version of TisPlan

Policy name changed as suggested. Development on brownfield, or previously developed, land is specifically encouraged in the NPPF (Paragraph 111 of the NPPF 2012 version).

The site assessment has been considered in tandem with the very strong feedback from the community about the importance of protecting the fields south of The Avenue. The likelihood is that targets will be fulfilled with available and deliverable brownfield sites.

The TisPlan questionnaire invited open comments for both potential brownfield and greenfield sites where respondents were given the opportunity to propose additional sites and what should be built there, in addition to the known sites already being suggested.

TisPlan's recent health check (July 2018, IPE) supported the objective of prioritising available and suitable brownfield sites over the development of greenfield sites and proposed that any major development on greenfield sites should not be permitted.

TisPlan has carefully considered the appropriate balance between all dimensions of sustainability as set out in the NPPF (See Appendix 8 - Basic Conditions Statement) and maintained its position on prioritising brownfield sites.

Paragraph 5.147 of the Core Strategy acknowledges that new development should be limited to modest levels, appropriate to the scale of the settlements. As such,

TisPlan distinguishes this further by providing for "modest" levels of brownfield development in Tisbury and "limited" development in West Tisbury.

"Sensitively planned" is with reference to ensuring any adverse traffic impact is avoided; signposting to the AONB Management Plan is encouraged.

Section (Reg 14 title): Buildings

Sub-title: Settlement boundary

Policy number (Reg 14 version): BL.3

Reg 16 policy number: BL.3

Comments received from: Statutory consultee (R42, comment 293)

Comments received

Comments on the proposed adjustment to settlement boundary and the Draft Wiltshire Housing Site Allocation Plan DPD does not really form part of the Neighbourhood Plan. Tisbury Parish Council should ensure a representation is forwarded to the Spatial Planning team to this effect. Alternatively, the Neighbourhood Plan could set the Housing Policy Boundary where justification and evidence is provided.

How comments/concerns addressed by Submission Version of TisPlan

TPC responded to the housing policy boundary consultation on 21/9/17. TisPlan supports the changes to the settlement boundary proposed by WC which bring in Station Works and the former Sports Centre.



Section (Reg 14 title): Buildings

Sub-title:

Policy number (Reg 14 version): BL.4 and BM.2

Reg 16 policy number: BL.7 and EB.2

Comments received from: Statutory Consultee (R44, comment 170); Statutory consultee (R35, comment 106).

Comments received

Remove warehouse and distribution as a preferred employment use as it is in conflict with the AONB MP (Statutory Consultee - R44, comment 170);

The Council accepts the principle of development on the Station Works, but we would suggest that permitted development is limited to uses that will not generate further regular HGV usage, such as warehousing and machinery storage, because of the adverse impact on surrounding roads accessing the A303 and A30 Statutory consultee (R35, comment 106).

How comments/concerns addressed by Submission Version of TisPlan

Following feedback from the AONB and neighbouring villages with concerns that B8 use classes would have a detrimental impact on the character of the AONB and traffic impact on through routes TisPlan acknowledges these concerns and has re-drafted Policy BL.7 and TR.4.

Section (Reg 14 title): Buildings

Sub-title:

Policy number (Reg 14 version): BL.4

Reg 16 policy number: BL.7

Comments received from: Developer (R32, comment 227); Local Resident (R29, comment 90); Statutory consultee (R44, comment 107); Developer (R8, comment 97); Statutory Consultee - R43, comment 298

Comments received

The plan at pp12/13 does not cover all the subject site. This should be included as and when the plan is re-scaled as per the footnote- the full extent being defined as Site 1 at Appendix 6.

The amenities of the new residents, general sustainability principles and the loss of employment use must be weighed against AONB issues.

Redevelopment of Station Works, presents a risk to the features of the River Avon SAC due to the scale of potential contamination and the site's close proximity to the river, despite it lying some 2 km upstream from the SAC. Site remediation to the satisfaction of the Council's Environmental Health team and the EA can be expected to remove any risks. I recommend that this issue is recognised in the wording of the policy (Statutory Consultee - R43, comment 298).

Reference Station Work's impact on the historic environment, the AONB and wildlife is required.

The policy itself should be a conclusion of the more detailed supporting text but the policy as currently drafted has more detail (but not the discussion/debate reasoning).

How comments/concerns addressed by Submission Version of TisPlan

The allocations map indicated the actual site boundary (within the revised settlement boundary).

The context to Station Works now has a much broader supporting narrative in relation to its setting adjacent to the conservation area and the potential for adverse environmental impacts on landscape and biodiversity, including impact on the River Nadder SAC due to phosphate loads arising from potential development and potential disruption to bat species within the context of the Chilmark Quarries SAC.

Station Works Policy BL.7 has additional measures in the policy to ensure a balanced and sustainable approach to the comprehensive redevelopment of the

site. These conditions aim to meet the needs of a number of potential users as well as ensuring there are no adverse environmental impacts, notably on the phosphate loads arising from new development into the River Nadder (SAC) and any disturbance to bats which may be roosting at the site, as advised by WC's Habitats Officer during Reg 14 consultation. It is a sensitive site, but the overwhelming response from the community is that the site should be redeveloped.

Section (Reg 14 title): Buildings

Sub-title: General conformity and rationale for choice of site for mixed development

Policy number (Reg 14 version): BL.4

Reg 16 policy number: BL.7

Comments received from: Developer (R32, comment 91-5, 231, 229). Local resident (R33, comment 234); Statutory consultee (R41, comment 279); Statutory consultee (R42, comment 285)

Comments received

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".

Paragraph 5.145 of the Wiltshire Core Strategy aims to balance development and minimise out-commuting then the widest offer of employment opportunities should be promoted and protected. Therefore, the allocation of Station Works is not in conformity with Wiltshire Core Strategy and the NPPF because it would result in the loss of one of the last large remaining employment sites in the plan area with existing occupation of employment uses and tenants.

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 to modern business needs. This option 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.

States reservations about the need to use Station Works for housing if remaining housing targets could be met by infill or small additions to the existing settlement.

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 [now BL.7] allocates the site at Station Works for 'comprehensive redevelopment', but the quantum of the various proposed uses is not given.

Further, it has many significant issues that may make it undeliverable and conflict with other TisPlan policies:

- 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. 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. 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.

- 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. Maintaining the site as employment land would cause minimal land disturbance and reduce contamination costs.
- EM.2. There are businesses currently on the site which would indicate there is a need for employment. 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 or any indication of replacement suitable premises
- TR.1: 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.
- BL.6. The site is quite prominent and highly visible from the High Street and higher areas of Tisbury. This would argue against it being developed for any substantial buildings as it would be intrusive in the AONB. While Policy BL.7 makes general provision for the preservation and enhancement of the Conservation Area it may be worth reinforcement by making this a specific provision within BL.4 consistent with that for wildlife and the AONB as set out in criterion ix.

Could it be that the realistic use for that site would be car parking? Why not encourage people from areas around to use the station and travel by train? You say you don't want people from surrounding areas to use the station, but I can't see why. I suggest it is considered whether car parking plus some commercial and work-related spaces, even some retail, would be a far better use of this site. Transport Policy TR1 is broadly in line with this.

It would be prudent to stipulate the number or approximate number of dwellings to be delivered on the allocated site. This is to ensure certainty to the community. We would also advise in the pre-amble to confirm that you expect this site to meet

the housing need for the Neighbourhood Plan period (up to 2030). It should be noted that any proposals for development must meet the demonstrable housing need which will be assessed at the time of the planning application.

How comments/concerns addressed by Submission Version of TisPlan

The draft settlement boundary was revised in 2017, bringing Station Works into the housing policy boundary. In order for TisPlan to prioritise available and suitable brownfield sites (as per policy BL.3), it is essential these sites are utilised to the extent that they can meet demands both in housing and employment land. Following the results of the community questionnaire in 2015, subsequent discussions with Network Rail and a small-scale survey of local employers this engagement showed that Station Works is an ideal location to meet employment, railway expansion priorities and housing need.

The overall questionnaire results indicate there would be support for a mixed-use development at Station Works (Qu. 6), recognising the potential of the site to meet a range of local needs whilst still addressing key environmental constraints as highlighted by Wiltshire Council. A more detailed breakdown of uses has been clarified in the revised policy wording and supporting text. The exact mix of these uses is to be agreed during the planning application process in conjunction with a masterplan outlining the uses of the site and available evidence of housing and employment need, in close collaboration with the community. This should include employment, housing, parking and allocation of sufficient land for the future expansion of the railway. A maximum of 60 dwellings has been included in the policy.

It is now a relatively common sight to see residential development adjacent to the railway, including along the Waterloo to Exeter route. TisPlan expects that any future planning application must ensure that development is appropriately sited based on the outcomes of a contamination study, e.g. design to reduce noise impact, landscaping and amenity spaces or pollution and visual impacts from mixed development or associated use of the railway station, as highlighted in Policy BL.7. Any gardens and amenity space must be located away from areas of contamination.

The WC Core Strategy CP35 outlines that the total net loss in employment land is less important than the redevelopment of employment land to provide net gains in the total employment on the site. It is not anticipated that there will be a loss to overall employment at Station Works. TisPlan expects that by promoting a comprehensive mixed-use development on the site it will generate a net gain overall to employment in the plan area.

The allocation of the site for mixed-use reflects the suitability of the site for various uses as supported by the split preferences in the questionnaire results. A more detailed breakdown of this split in different uses has been clarified in the revised policy wording and supporting text. The exact mix of these uses is to be agreed during the planning application process in conjunction with a masterplan, outlining the uses of the site and available evidence of need and in close collaboration with the community.

Existing tenants on the site are on short-term leases. In principle, Nobles (situated outside of the site boundary bordering the access route into the site) have indicated their support for a comprehensive redevelopment at Station Works, with the aim of enhancing their business accommodation.

It is expected that both BL.7 and TR.1 (Tisbury Railway Station) will promote more sustainable patterns of transport overall e.g. railway, walking, cycling and low/zero emission vehicles. Both residents and employees can readily use the railway for commuting to work and for non-work-related travel. The need for a second platform would not be affected with an employment-only development since any new businesses would be encouraged to use the railway station for commuting and visitors to meet sustainable transport objectives. TisPlan seeks to improve sustainable transport and meet housing and employment demand relative to its size and actual need. Modernising the entire site for employment may increase the number of people commuting into Tisbury, although it is recognised that it could also promote local employment but that, overall it is unlikely that all of the site would absorb local employment need.

With appropriate design and sensitivity to the mix of uses and different needs of users residential and employment uses can co-exist, as indicated at the Wyndhams Estate on Hindon Lane, Tisbury. TisPlan also proposes a requirement for separate

access routes for different users (e.g. residential, users of the railway station or employment).

The masterplan will determine the appropriate siting and design of a mix of uses, depending on the outcomes of the decontamination survey.

TisPlan has proposed a minimum density on the site and at the same time encouraged apartments to increase density. It has encouraged a mix of uses as there is demand for both employment on the site and as a large brownfield site in the area could accommodate a significant percentage of the housing targets over the plan period.

B8 uses are not supported throughout the plan given the potential impact on the character of the AONB and the impact on neighbouring villages. B2 uses are encouraged on the site.

BL.7 (former BL.4) is clear there should be no adverse environmental and landscape impact with an appropriate scale and design adjacent to the Conservation Area. This has also been enhanced with an additional [Appendix 6 - Design and Visual Impact](#).

Section (Reg 14 title): Buildings

Sub-title: General conformity and rationale for choice of site for older persons' accommodation

Policy number (Reg 14 version): BL.4

Reg 16 policy number: BL.7

Comments received from: Developer (R32, comment 96, comment 229); Local resident (R33, comment 234)

Comments received

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. The site's poor proximity to Tisbury's facilities and services and its proximity to the rail station means this site is not appropriate for elderly care. This has been corroborated by leading older peoples' housing providers care who have advised that they would not take up the opportunity to provide such accommodation on this site and it is not viable with such a use. It is not clear whether older persons' dwellings would contribute to the housing targets for the area.

Normally continuous care facilities are located near to town centres in order 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.

How comments/concerns addressed by Submission Version of TisPlan

TisPlan recognises the viability concerns of developers of older persons' accommodation given the relatively modest population in the rural hinterlands that any continuous care complex would serve. However, this could still be considered as an option during masterplanning. Improvements to the access to be negotiated with Network Rail will accommodate those with mobility issues, therefore facilities and services would be within a short walking distance to the High Street.

Section (Reg 14 title): Buildings

Sub-title: Viability of employment redevelopment

Policy number (Reg 14 version): BL.4

Reg 16 policy number: BL.7

Comments received from: Developer (R8, comment 98, 101; 103; 104). External consultee (R30, comment 109); Local resident (R33, comment 234)

Comments received

A number of buildings on the site have been demolished over recent years and those that remain are all nearing the end of their economic lives, some being let out on short term tenancies, others being vacant along with open storage areas despite ongoing marketing.

We welcome the Plan's encouragement for and enabling of a comprehensive redevelopment of the Station Works site on the assumption that the former use is to be extinguished.

We query as to whether there is evidence that a 'business park comprising smaller units... might attract more... employment'? Evidence from the marketplace that we are aware of would not necessarily support this statement. While recognising the Plan's aspirations for provision of employment space, the real-world marketplace will dictate the nature, quantum and viability of such provision, particularly if sought to be provided speculatively.

Scheme viability will depend upon issues such as costs of decontamination, quantum, nature and mix of residential use and the demand for any employment uses.

We are aware of the history of use of the site and our technical/ construction team are initiating further technical and geotechnical work to reassure the Parish, ourselves and any Inspector that redevelopment of the site for residential use is both deliverable and viable. It is noted and welcomed that brownfield sites are the target for the NP, but in practice they do carry a higher site preparation cost when compared with greenfield sites, an issue which affects viability.

Any decontamination would be a prerequisite for any owner of the site, but funding of such work would need to be generated by any newly consented use and hence would in practice only happen after grant of planning permission and perhaps transfer of ownership.

I'm not sure your vision for the site is that clear: B1 office accommodation, broad housing mix, inc. low cost starter homes, elderly / retirement accommodation, community land trust / self-build, plus the station expansion and its car parking. There's quite a lot to go at here – are you sure all this is possible on a site of this



size? Perhaps even more reason for a masterplan to be developed...

How comments/concerns addressed by Submission Version of TisPlan

The current tenants are on short-term contracts (as per feedback from St Modwen), which has been included in BL.7 supporting text. BL.7 supporting text emphasises that the site need to be redeveloped to be suitable for modern business needs.

TisPlan is keen that any employment use is not “extinguished”. The exact nature of the employment site is a question of masterplanning but between 1/4 - 1/3 of the site should be used for employment, with the preferred use classes of B1 and B2. A detailed masterplan at the time of an application, with consultation with local businesses (as per policy EM.2), will inform the design of employment space on the site.

A small-scale employment survey indicated a preference for local business to move to a redeveloped Station Works which could enable existing businesses to expand into suitable larger premises or attract new businesses to the area, which could benefit from the close proximity to Tisbury Railway Station.

Section (Reg 14 title): Buildings

Sub-title: Transport and access issues

Policy number (Reg 14 version): BL.4

Reg 16 policy number: BL.7

Comments received from: External consultee (R30, comment 224; 109); Developer (R32, comment 230); Developer (8, comment 105); External stakeholder (R30, comment 224); Developer (R32, comment 227);

Comments received

A master plan should consider:

i. Safeguard land for the expansion of the single track to dual track, including

provision for a second platform, in accordance with the minimum requirements set out in policy TR.1

ii. Make provision for and include full details of a pedestrian bridge crossing of the railway, to provide access to the site and a second platform, including its landings and pedestrian routes into the new development, and shall detail how this is to be phased as part of the development. The bridge shall be fully completed and opened to pedestrian traffic prior to the occupation of the [x] dwelling.

iii. Detail the mix of uses, movement routes, areas of public and private space, building height and envelope, density

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.

Any new pedestrian bridge across the railway would in all probability only be funded by new development on the subject site, perhaps along with some Network Rail support, and it would only be needed in terms of newly generated demand to cross the line as and when that development is occupied. While it is recognised that space for the second platform and perhaps disabled parking and drop off will need to be safeguarded in any scheme proposal, it would be unreasonable and impractical to require provision of a bridge before commencement of development.

Building this costly bridge before doing anything else will be a big cash flow problem for developers, in that they will need to sell some units to fund the bridge. I wonder whether a policy allowing the phasing of some development to take place before the bridge is built might not make the delivery of the bridge more likely. The policy could require that the bridge is constructed and made fully operational prior to the completion of half the Station works development. (Usually, you’d tie it back to the occupation of the 25th, or 50th dwelling etc.) Also consider a requirement for the

planning application to include a comprehensive masterplan to be submitted for the whole site, showing how the development delivers policy BL.4 and TR.1

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.

How comments/concerns addressed by Submission Version of TisPlan

Suggestions for a masterplan have been incorporated into Policy BL.7 and the need for sufficient land for the railway is outlined in Policy TR.2 and supporting text. However, the S106 agreement will determine the specifics on the timing of the crossing of the railway, working in close contact with Network Rail (which may include options for shared costing or phasing of the development). TisPlan emphasises the site assessment conclusion that a safe vehicle and pedestrian access into Tisbury village must be put in place as a condition of development, including improvements for access to the High Street.

Section (Reg 14 title): Buildings

Sub-title: Viability and meeting community priorities

Policy number (Reg 14 version): BL.4

Reg 16 policy number: BL.7

Comments received from: Developer (R8, comment 103); Developer (R32, comment 230)

Comments received

Provision of everything on the list of the communities' priorities is unlikely to be achievable as a deliverable, viable scheme has to be consented and implemented so as to extinguish that use and to enable improvements to the railway line and access to the station.

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.

How comments/concerns addressed by Submission Version of TisPlan

TisPlan has set out the potential for the site to deliver a range of development solutions. It is up to the developers/owners to determine how best their planning application can meet the criteria proposed by the community.

Section (Reg 14 title): Buildings

Sub-title: Suitability of The Avenue as an alternative housing site

Policy number (Reg 14 version): BL.4

Reg 16 policy number: BL.7

Comments received from: Developer (R32, comment 232-3)

## Comments received

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.

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.

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.

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.

## How comments/concerns addressed by Submission Version of TisPlan

We understand the rationale in favour of the development of this greenfield site. However, it is highly valued by the community as the most iconic landscape in Tisbury. Any proposed development will be very strongly resisted. The proposed site has not been included in the revised settlement boundary review carried out by WC. TisPlan does not support greenfield development as this proposal suggests and there would be likely associated disruption to wildlife and water (flooding or sewage impact) on the River Nadder SAC. Development on The Avenue would be inconsistent with biodiversity, flood policies and landscape policy. These are most definitely 'environmental detractors'.

Other brownfield sites assessed in the site assessment could come forward within the plan period in addition to station works to fulfil housing need over the plan period, which at a maximum would well exceed the anticipated projections (which have been likely reduced into the next CS period, though an actual figure has not yet been calculated).

Section (Reg 14 title): Buildings

Sub-title: Impact on Statutory Environmental Designations

Policy number (Reg 14 version): BL.4

Reg 16 policy number: BL.7

Comments received from: Statutory consultee (R43, comment 290); Statutory consultee (R43, comment 299)

## Comments received

This policy makes comprehensive redevelopment of the Station Works a priority for the plan. The site comprises brownfield land lying within the rural corridor of the River Nadder and could therefore potentially support SAC bat species. Development may lead to the loss or modification of buildings which the bats use for roosting and disrupt flight routes through removal of vegetation or installation of new lighting. The SAC therefore represents a constraint to development and I therefore recommend this is recognised in the wording of the policy.

## Chilmark Quarries SAC

The following wording inserted into policy BL.4 would enable this policy to be scoped out of further HRA for this SAC

“xii) Sufficient survey is undertaken to determine whether the development would affect bat species which are features of the Chilmark Quarries SAC and appropriate measures taken to avoid and mitigate impacts if these species are present.”

No reference has been made to this SAC in the plan and consequently there is a risk that developments progress to an advanced stage without any knowledge of the restrictions that could potentially arise through a later HRA. The implications could be costly, cause significant delay and potentially lead to an application refusal. Therefore, I strongly recommend that wording is inserted into the explanatory text for these policies to bring to developers' attention that bat surveys should be undertaken before design work commences.

## River Avon SAC

Redevelopment of the Station Works presents a risk to the features of the River Avon SAC due to the scale of potential contamination and the sites close proximity to the river, despite it lying some 2 km upstream from the SAC. Site remediation to the satisfaction of the Council's Environmental Health team and the EA can be expected to remove any risks. I recommend that this issue is recognised in the wording of the policy.

How comments/concerns addressed by Submission Version of TisPlan  
Suggested text inserted into BL.7 supporting text and policy on bat species.

Any potential risk to the River Avon SAC is recognised in the supporting text as well as point 13 of the policy.

Section (Reg 14 title): Buildings

Sub-title:

Policy number (Reg 14 version): BL.5

Reg 16 policy number: BL.8

Comments received from: Statutory consultee (R42, comment 281); Local consultee (R14, comment 110-1)

Comments received

The safeguarding of this site for education expansion is supported by Wiltshire Council's Education team given the small size of the school site and that it currently only holds 4 classes. The education team would also support the safeguarding of the field to the rear of the school site for educational purposes.

However, the school's governors recognise the importance of protecting the area adjacent to the school for potential future growth in educational provision, we are concerned about the immediate future as the site is becoming unkempt and attracting groups of young people who are dropping litter, cans etc and causing a potential security risk to the school buildings. We would not want the building to be left to deteriorate still further.

It is also unlikely the school would need to use the whole of the current area designated in the short or medium term.

How comments/concerns addressed by Submission Version of TisPlan

St John's School has proposed that they do not require the whole of the area of the site in the short or medium term but TisPlan has recognised the potential

for longer-term expansion of educational facilities. Wiltshire Council's Educational Team had also endorsed such an approach, as well as positive feedback from the community during Reg 14 consultations. The policy has been broadened to include support for wider community-led, rather than market-driven, development.

Section (Reg 14 title): Buildings

Sub-title:

Policy number (Reg 14 version): BL.7

Reg 16 policy number: HNA.2

Comments received from: Statutory consultee (R42, comment 281); Local resident (R29, comment 111; 115; 117-8); External consultee (R30, comment 114); Statutory consultee (R44, comment 304;6)

Comments received

We are pleased to see how much the area's distinctive historic environment is valued by its community and reflected in the regime of policies and Action Points set out in the table on p29. The policy objective should read "Conserve and enhance the Conservation Areas and their setting".

My main recommendation is that there should be a separate section and policies on Historic Character and Heritage Assets as well as the current section on design. This separate section should follow Historic England guidance and include:

- Analysis of the historic character of the area highlighting its contribution to the development and appearance of the place.
- The environmental issues which the Plan seeks to address
- Opportunities to repair, conserve or bring heritage assets back into use, especially those that are at risk. Pg. 16 4th paragraph Traditional Agricultural buildings – refer to copious Historic England guidance and character statements.
- Policies to manage the settings of heritage assets or important views

The Cranborne Chase AONB completed a Historic Landscape Characterisation. Salisbury District Council would have authored a Landscape Character Assessment



rather than an HLC which is very different. Reference can be made here to the relevant sections of the AONB historic environment action plans and historic landscape characterisation.

- The identification of any listed buildings, scheduled monuments, registered parks and gardens, and battlefields or local heritage assets, and a discussion of the contribution they make to local character [currently the details of designated heritage assets are buried within policy BL6 on page 23 and there is no discussion of contribution to local character]

I would also strongly suggest that policies be included not just on the Conservation Area but also historic parks and gardens, views and viewpoints [which may overlap with landscape] and heritage assets and historic character in general.

Pg. 9 the Objective of BL7 should be "Conserve and enhance the Conservation Areas and their setting"

Pg. 24. Map 7 should read Designated Heritage Assets rather than Heritage Sites

Final paragraph move to top of section. Rather than strengthened planning refer to Conservation Area as a designated heritage asset and keep definition. Remove reference to CAA and statutory powers and replace with when the CAA was adopted by the Local Planning Authority

There is no policy on historic retrofitting (referred to CSE guidelines).

Include a discussion on why Chicks Grove Quarry stone is preferred.

How comments/concerns addressed by Submission Version of TisPlan

Much of Tisbury High Street is within a Conservation Area and TisPlan seeks to preserve and protect its valuable heritage assets, a key objective of the AONB Management Plan 2014-2019, which TisPlan is keen to support. The policy objective has been reworded as suggested and the policy has been carried into a revised Historic and Natural Assets section (formally a mix of Countryside and Environment and Buildings).

TisPlan has emphasised that modern designs need to respect the character of the

existing settlement, landscapes and in particular the Conservation Area in Policy BL.4 Design and Landscape and HNA.2 The Conservation Area. Further context to historic assets has been added, including rationale for Chicks Grove quarry stone. Rather than be too specific, Policy HNA.2 indicates that proposals for installations and replacements on front elevations that would adversely affect the character of the Conservation Area Character Zones will be strongly resisted. Policy HNA.2 has not included the historic parks and gardens as these already enjoy statutory protection.

CAA is a supplementary planning guidance (confirmed by WC). The supporting text has been revised to confirm that the landscape character assessment was carried out by SDC and the historic landscape characterisation created by AONB has been included. Reference has been made to the historic landscape characterisation and the AONB historic environment action plan for Area 9 Vale of Wardour.

Section (Reg 14 title): Buildings

Sub-title:

Policy number (Reg 14 version): BL.8

Reg 16 policy number: BL.5

Comments received from: Developer (R31, comment 121); Local resident (R33, comment 265); External consultee (R30, comment 122)

Comments received

The Council supports the plan's policy to minimise the impact of new development on the night sky, a policy initiative also being sponsored by the Cranborne Chase AONB.

Whilst recognising the community's aspiration to achieve energy efficiency in new developments, this power is not within the remit of the neighbourhood plan. Whilst the policy states that development should 'consider' the viability potential of energy efficiency facilities, it then goes on to state 'to ensure that development exceeds the minimum energy saving requirements set out in building regulations' (emphasis

added).

The written ministerial statement to parliament dated 27th March 2015 makes clear that neighbourhood plans should not apply any additional technical standards relating to the construction of new homes and that the optional technical standards should only be implemented through a Local Plan based on clear and up-to-date assessment of need. Neighbourhood Plans should not be used to apply any new standards relating to energy efficiency. Developers are not required to go further than what is required by Building Regulations. This policy will need to be significantly modified to ensure its compliance with national policy and the basic conditions.

All new development should mandate onsite energy heat/energy generation to the maximum extent that regulations allow. At least homes should be zero carbon.

Please be a lot more definite on the control of light pollution. All external lights should be down pointing and only installed where they are essential, including street lights.

Consider splitting the policy in two with a Merton Rule policy (requiring the incorporation of renewables on-site) and a separate policy covering standalone renewables. I'd encourage a more thorough look at renewables to set out what resources are available and potential sites, and what type of developments could be acceptable where.

The Merton Rule element of the policy also could be worded more strongly, "consider the viability of" could be strengthened considerably, and you give no minimum % for the provision of on-site renewables. I'd always put the requirement first and then if you have to mention viability considerations, do this last. Otherwise it's inviting developers to say, "no it's not viable".

How comments/concerns addressed by Submission Version of TisPlan

Whilst it is true the Ministerial Statement in 2015 stated NPs should not set additional technical standards, more recently examiners' reports have allowed NPs to include more ambitious policies on energy efficiency, particularly for those on exception sites. Indeed, NPs have a legal duty to specify how they meet climate change targets/legislation (CSE, 2017). Since Station Works is a site that can deliver

most of the housing need for the current core strategy period, a minimal impact on energy and water is encouraged.

New buildings designed to significantly exceed the energy standards as set out in Building Regulations should be encouraged where feasible and viable, and providing the proposal would not compromise the character of the AONB. Dark Skies and light pollution has been emphasised in the policy.

Standalone renewable energy is already covered by the core strategy (CP 42).

Section (Reg 14 title): Buildings

Sub-title:

Policy number (Reg 14 version): BL.9

Reg 16 policy number: BL.6

Comments received from: Statutory consultee (R42, comment 282); Developer (R32, comment 329)

Comments received

There are elements of infrastructure provision detailed elsewhere in the plan that could be detailed in this policy to ensure a comprehensive list is provided to the parish council. These include TR4 para 3, provision of additional passing places, improve verges or traffic calming measures where feasible, TR5 the provision of the expansion of the rights of way network, provision of dropped kerbs and provision of pavements and LCW3 the provision of amenity space.

It should be noted that the provision of broadband is not secured through the planning process this is left to the developer and the market.

There is a requirement that all cabling will be underground and there will be no pole-mounted transformers. - is this enforceable?

How comments/concerns addressed by Submission Version of TisPlan  
Infrastructure priorities drawn from elsewhere in the plan are listed in the CIL

policy. The provision of broadband not being a planning issue is noted but TisPlan still wishes to encourage infrastructure in new development that does not adversely impact on landscape and the AONB.

## Transport

Section (Reg 14 title): Transport

Sub-title:

Policy number (Reg 14 version): TR General

Reg 16 policy number: TR General

Comments received from: Statutory consultee (R44, 135- 137); Local PC (R35, comment 132-3)

Comments received

The unchanged road system is key issue for Tisbury. The Wiltshire Core Strategy sets out that selective improvement of the local transport network will be undertaken based on functional importance. In Tisbury and West Tisbury there has not been any significant improvement in recent years and it remains a major issue for the local community.' Para 4 - clarify objective of WC to either protect verges or widen the lanes.

The Council observe that widening roads to facilitate HGVs is counterproductive as it will only encourage more usage.

There is no mention of buses and supporting text needs to explain the provision of community transport schemes. It is unclear why there should 'most definitely no decrease in the provision of off-road parking'. There are additional pinch points to those mentioned in para 10, such as the 100m narrowing at the top of Yule Hill and the lane between Middledean and Vine Cottage & church corner and the bridge by the pub.

Para 7 - "However, the advent of the double yellow lines has resulted in increased pressures on the availability of parking close to the railway station, with an associated adverse knock-on effect into the local village streets" - what effect has this had on what provision for parking?

How comments/concerns addressed by Submission Version of TisPlan  
Wiltshire Council's endorsement of not widening the roads due to adverse higher traffic impact is noted. Additional pinch points have been noted (including those in Swallowcliffe and Ansty). The unchanged road system is a key issue for Tisbury. TisPlan supports the provision of improved passing places but not the widening of the road network.

The mention of reduced bus services in the plan area is noted in Transport section introduction. More local stops for the railway have been included. Community transport schemes are voluntary.

Section (Reg 14 title): Transport

Sub-title:

Policy number (Reg 14 version): TR.2

Reg 16 policy number: TR.1

Comments received from: Developer (R8, comment 149); Local stakeholder (R4, comment 146).

Comments received

We note the aspiration to encourage greater than the minimum required level of parking but would query how this could reasonably be achieved in planning policy terms.

While reference to 2 parking spaces per family unit is understood, this would not be appropriate for smaller units/ flats nor any unit for the aged.

TR2 Parking provision should be provided at the Station Works.

## How comments/concerns addressed by Submission Version of TisPlan

A mix of uses for parking: station (long and short stay), employment and residential must be addressed during the master planning stage. Older people also require cars in a rural area, although it is understood that for continuous care this may not always be appropriate.

Section (Reg 14 title): Transport

Sub-title:

Policy number (Reg 14 version): TR.1

Reg 16 policy number: TR.2

Comments received from: Statutory consultee (R42, comment 283; 139); Local PC (R4, comment 142); Statutory consultee (R42, comment); External consultee (R30, R266); Local resident (R33, comment 262); Local resident (R17, comment 143).

## Comments received

With regard to the prospect of the railway line becoming dual-tracked, the plan does not express whether or not there is a desire to see increased railway passenger services (which might have the downside of increasing road traffic into Tisbury). As things stand, the benefits of track dualling are more likely to be directed towards faster services for major centres than to any improvement of service at Tisbury.

The provision of a pedestrian bridge is likely to be a controversial issue, as meeting requirements for disabled access and leaving room for future overhead electrification tends to result in a large-scale structure. The prominence of a footbridge would be exacerbated by the elevation of the station with respect to the roadway.

The council is uncertain if the elevation difference between track and roadway is sufficient to facilitate a subway crossing of the line, but this would be less intrusive visually. Cost is likely to be an issue (although footbridges with ramps/lifts aren't cheap either!). Subway installation could be done when the line is temporarily closed for redoubling work.

Clause (i) is supported but suggest removal of the final phrase "through the provision of a bridge". The scheme should also provide the alternative route for the PRow that currently crosses the railway line at-grade to the east of the station (e.g. this would apply to footpaths in W.Tisbury (13a 13b 14) Tisbury (15 16 74 & 82) and possibly introduce some cycle tracks leading to the station.

The reference in clause (iv) to "innovative parking solutions" should refer to policy TR3. The prospects for underground parking are slim, due to cost.

With regard to clauses (ii), (iii) and (iv), the Wiltshire Council LTP policy is to require each station to have a Station Travel Plan and for additional car parking to be considered as an element of this. A draft STP for Tisbury exists, but is intended as a "living document" that should be updated whenever needed or when new evidence is obtained.

The guidance in the Plan at TR1 is noted and recognised, although there is limited opportunity on the subject site for provision of additional customer parking.

The extent of long-term parking at the station (for stays-away) is not clear. If significant, there may be an opportunity for encouraging its users to consider taxis as a cost-effective solution.

I'd strongly suggest consulting Railtrack to confirm exactly how much space would be needed for the dualling of the line, second platform and bridge crossing. Then show it clearly on a scaled drawing in your NP, attached to this policy. If they're dualling in the area, they might already know the land-take. Much better to set out in advance and in black and white a clear idea of what minimum space is needed, than to have to scramble around once an application is in on the adjoining land to see whether the space left over by their plan is sufficient.

The new rail franchise is most unlikely to result in improved services without vigorous lobbying in all quarters. See the current report by SERUG – the Salisbury to Exeter Rail Users Group.

The station yard at Gillingham should be taken as a model and include short stay parking, 20 minutes for pick up and drop off. Network Rail/new franchise responsible for providing more parking space.

How comments/concerns addressed by Submission Version of TisPlan

A desire for increased stops to the railway serving Tisbury has been added, whilst recognising this may have a knock-on effect on traffic coming into Tisbury. Network Rail's land requirements for the doubling of the track have been included in TR.1 (inc. provision for a potential subway or elevation for a bridge). Specific reference to a bridge has been removed and a more generic pedestrian crossing is sought in TR.2 and BL.7. Innovative parking refers to TR.3.

A mix of uses for parking: station, employment and residential should be addressed during master planning stage. We would expect that any issues relating to the expansion of footpaths and cycle routes should be addressed during the planning application process.

An action point to work with SERUG to influence improved provision and a doubling of the track is included.

Section (Reg 14 title): Transport

Sub-title:

Policy number (Reg 14 version): TR.3

Reg 16 policy number: TR.3

Comments received from: Statutory consultee (R42, comment 297); Statutory consultee (R44, comment 151); Developer (R8, comment 150).

Comments received

The policy needs supporting text. The plan could consider making residential parking less tightly-coupled spatially to the buildings (for example, as a communal car park). This would allow building to be more in-keeping with the traditional layout from a time before cars were a design issue. As a further benefit, consider making such car parking dual-purpose where relevant; i.e. during the day when commuters are away, it could serve as time-restricted parking for visitors to Tisbury.

Provision on multi-level or below ground is unlikely to be viable.

How comments/concerns addressed by Submission Version of TisPlan

Added criteria to consider dual purpose parking options and communal car parking. Tisbury Parish Council keeps its parking strategy under constant review and this point has been noted.

Section (Reg 14 title): Transport

Sub-title:

Policy number (Reg 14 version): TR.4

Reg 16 policy number: TR.4

Comments received from: Local resident (R28, comment 131); Local PC (R40, comment 277); Local resident (R24, comment 129); local resident (R2, comment 127); Statutory consultee (R44, comment 157); local resident (R2, comment 154). Local resident (R15, comment 297); Local resident (R11, comment 156); Local resident (R4, comment 155); Developer (R34, Comment 338).

Comments received

I feel concerned about putting more houses near the centre of the village. We already had traffic congestion, probably since the new development at Wyndham Place and no doubt it won't be long before there is an accident caused by volume of traffic.



We have reviewed the Tisbury & West Tisbury Neighbourhood Plan 2017 - 2030 (Pre-submission version) and have concerns about the effect it would have on Ansty. We currently suffer from a large amount of through traffic serving Tisbury and we would not want this situation to get any worse. Therefore, if you wish to undertake development or make changes that would increase traffic through Ansty, then this should be offset by reductions in existing traffic journeys.

This would be consistent with the aspirations you set out for conserving and enhancing Conservation Areas and conserving, enhancing and protecting the countryside. We therefore expect you to apply these same principles to the neighbouring areas beyond your Parish boundary when formulating your Neighbourhood Plan and dealing with the impacts of your proposals.

TR4 we can't wish away heavy vehicles and therefore need to provide more passing places. At the moment this is supplied by erosion of the sides of road, field entrances and drives fronting on to the road. Obstructions placed on verges and on drives to deliberately stop drivers making use of these areas should be discouraged. We live in the country but still need to get about. The other option is to ask for new roads and this does not seem a very popular option.

The plan should emphasise road safety issues, particularly for cyclists and the effect of speeding cars and poorly maintained roads. I have followed the various stages of the TisPlan and read and digested the environmental effects. Planning, parking and transportation nowhere can I find any mention of increased traffic flow and more importantly the speed of that increased traffic. Maybe I've missed it, but it is certainly instrumental in Tisbury's residents' well-being. A new 20-mile limit has been implemented on many roads into Tisbury but not all and speeding is a huge concern with the increased traffic in and around Tisbury. With regard to the encouragement of other forms of transport i.e. Bikes or walking Court Street is simply too dangerous to consider this a possibility and there are other roads equally as dangerous. Until the issue of enforced speed control is adopted and some money spent on that then I see a huge flaw in the TisPlan proposal.

The Council suggest the wider use of 20mph speed limits should be proposed by the Plan, especially on A30 access roads to the Village including Tisbury Row, High Street Ansty and Yule Hill narrows, Swallowcliffe.

As a resident of The Avenue, I'd like to register my concern at the speed at which very large agricultural vehicles frequently pass down this narrow road (with poor visibility on approaches to bends). Children and dog-walkers frequently cross the road to access the field opposite and the potential for a serious accident seems unduly high.

Consider greater use of rail freight to reduce adverse traffic impacts. Increased volumes of traffic is a separate, but related, issue to HGVs and agricultural traffic. There is not enough emphasis on upgrading passing places to help large tractors and trailers causing problems on our small country lanes. Small independent traders will probably not lead to more heavy articulated vehicles.

Is a two-year construction period considered as a short-term impact?

How comments/concerns addressed by Submission Version of TisPlan

TisPlan wishes to maintain the character of the plan area and for its neighbouring villages. B8 uses are not supported by the plan. TisPlan is keen to encourage sustainable transport by way of increased walking and cycling and use of the railway to reduce the dependence on cars for enhancing well-being, mitigating pollution and lessening increased traffic impact on neighbouring villages.

Traffic speed and traffic flow are now included in the Transport section background context and traffic calming measures are requested in the policy.

The additional number of cars on the road has also been added as a separate point from HGVs and agricultural traffic. Greater supporting text on the context has been added on issues of larger vehicles on narrow country lanes. Text also mentions that one way to avoid HGV traffic is to limit the types of employment uses in the area. The supporting text has been strengthened to highlight road safety issues.

Action point for TR.4 added to include working with farmers to reduce speed of tractors in built-up areas. There are highways regulations that inhibit any extension of the 20mph speeding restriction.

The policy encourages developers to mitigate unintended temporary traffic impacts.

Section (Reg 14 title): Transport

Sub-title:

Policy number (Reg 14 version): TR.5

Reg 16 policy number: TR.5

Comments received from: Local resident (R33, comment 264); Local resident (R24, comment 160); External stakeholder (R30, comment 267); Statutory consultee (R42, comment 286). Local resident (R18, comment 159).

Comments received

Tisbury High Street desperately needs wider, improved pavements and provision for pedestrians.

With regard to the encouragement of other forms of transport i.e. Bikes or walking Court Street is simply too dangerous to consider this a possibility and there are other roads equally as dangerous. Until the issue of enforced speed control is adopted and some money spent on that then I see a huge flaw in the TisPlan proposal.

It would be helpful to provide a plan (map) identifying where improved foot and cycle routes are required. This would be a good starting point for directing developer contributions towards improving the sustainable transport options. Wiltshire Council has produced plans for the larger towns, but it may be necessary to find funding for developing such a plan for Tisbury.

Quite often cycle storage is provided, but it's not secure, or not weather proof, or unusable in some way.

How comments/concerns addressed by Submission Version of TisPlan

Further supporting text on sustainable transport in the village and wider area has been added and criteria to support safe walking and cycling routes have been added.

Readers are signposted to the online Wiltshire Council Rights of Way Explorer which detail sustainable transport routes. It is anticipated that this can direct developer contributions to enhance the local sustainable transport network. Policy wording has been emphasised to provide secure storage for bicycles.

## Employment and Business

Section (Reg 14 title): Employment and Enterprise

Sub-title:

Policy number (Reg 14 version): EM General supporting text and vision

Reg 16 policy number: EB General supporting text and vision

Comments received from: Local resident (R22, comment 165); Statutory consultee (R44, comment 168); Statutory consultee (R44, comment 166).

Comments received

Vision - 'will attract' - implies a wish to draw in workers, population could increase due to commuting. Sustainable - less travel? Jobs for existing residents? The section is vague about actual jobs, tourism, conserving assets and attract visitors (Statutory consultee - R44, comment 168).

I would suggest an addition with reference to life style and tourism. Tisbury is the centre of high-quality food businesses. We have a good butcher, wine bar, fishmongers and a superb delicatessen. Around the village are half a dozen gastro and traditional pubs. These serve the community and bring in tourists from near and far. So far this has been an organic development. The local authorities should emphasise and market the area as what could be called the Gourmet hub of South Wiltshire. This will bring in employment and wealth to the community (Local resident - R22, comment 165).

How comments/concerns addressed by Submission Version of TisPlan  
Enhancing the local employment offer based on the skill base of the local community to meet local needs and improve sustainable transport patterns to reduce out-commuting are fundamental to achieving TisPlan's employment objectives.

Actual employment data has been added to the supporting text. The potential for increased tourism (particularly with the pull of the number of visitors to the art gallery, Messums) has been highlighted. The potential as the area as a "gourmet hub" have been included in the supporting text of the plan.

Section (Reg 14 title): Employment and Enterprise

Sub-title:

Policy number (Reg 14 version): EB.2

Reg 16 policy number: EM.2

Comments received from: Statutory consultee (R42, comment 289); Statutory consultee (R44, comment 331); Developer (R32, comment 175)

Comments received

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

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 (Developer R32, comment 175)

At para 4 of the policy, the loss of retail units to residential is currently allowed through permitted development rights and therefore this element would be difficult to implement in order to implement the policy some form of empirical evidence would be needed, and this should be discussed in the preamble.

At para 5 of the policy, it would be helpful if the use class order expressed was drilled down to the various components, e.g. C1 (hotels), C2 (residential Institutions), C3 (dwelling houses), as we do not think all classes should be listed here for example C3. This would provide clarity (Statutory consultee (R42, comment 289).

There is a need to address shop frontage issues (Statutory consultee - R44, comment 331).

The supermarket [Co-op] has what appears to be lack of storage space and relies on regular deliveries by large articulated lorries. The deliveries often cause chaos in the high street. It would be a disaster for the community if the supermarket closed but future planning should consider either re-siting of the supermarket which would be larger with space for delivery vehicles, or a 'depot' - perhaps at the bottom of the Wyndhams Estate and delivery to the existing supermarket by battery powered vehicle similar to an airport or station terminus system. Local resident (R26, comment 179).

TisPlan should not allow large supermarket in village/support independent nature of shops (Local resident (R 2, comment 173).

How comments/concerns addressed by Submission Version of TisPlan

The core strategy supports redevelopment of employment sites if it provides net gains in employment.

A small-scale employment survey was held in November 2017 to ascertain demand from some local employers on their business relocation needs and demand for alternative locations. Station Works proved to be a popular option for those who responded providing an indication that if local employers were actively engaged in

a masterplan for Station Works, their needs at the time of an application could be met by safeguarding of some of the land for employment purposes. Existing tenants are on short-term contracts and are aware they may need to relocate when the site is developed.

Sensitive location and traffic management (highways) on the site could ensure adverse noise and other associated impacts are minimised, as has been the case with Wyndhams Estate.

Employment development opportunities are not exclusive to Station Works and other locations such as the former Magistrates Court and outlying brownfield sites can also support a diverse offer of new employment opportunities or redevelopment of existing employment sites.

WC have confirmed that Wyndhams Estate met the employment need for the current core strategy period. The next core strategy is not expected to have a significant amount of additional employment land although the FEEMA has yet to be determined.

Not all use classes are listed (relevant uses are listed in the footnote). The loss of employment sites to permitted development is noted.

The need for protection of shop frontages in the conservation area has been noted in the Conservation Area policy HNA.2.

TisPlan has sought to ensure that local businesses are actively approached before the development of employment sites and has recognised the strongly independent nature of the High Street which may be threatened by future development.

## Leisure, Community and Well-being

Section (Reg 14 title): Leisure, Community and Well-being

Sub-title:

Policy number (Reg 14 version): LCW.1

Reg 16 policy number: LCW.1

Comments received from: Developer - R31, comment 189; Local resident - R29, comment 187

Comments received

A number of proposed LGS have been removed by the examiner when they were deemed to be "extensive tracts of land". Typically, this has been when LGS sites typically exceeding 2.4ha, with site measuring 1ha (Norley NDP) (Developer - R31, comment 189).

Refer to way local green assets link well into surrounding countryside through existing rights of way network. Should the field adjacent to LGS 1 and the Primary School also not be a local green space? (Local resident - R29, comment 187).

How comments/concerns addressed by Submission Version of TisPlan  
LGS evidence has already been structured according to the criteria set out in the NPPF (see Appendix 5 – LGS evidence base). Further detail on the LGS sites has been presented together with a map and a separate image with key data for each proposed LGS. The total proposed area is within the average of LGS proposals passing examination in other NDPs (under 1.7 ha and a total proposed area of 4.06 ha).

Further context on how green assets integrate into the urban and rural character of the area has been included. St. John's Primary School has indicated that it may wish to use expand on its own land in the future, which could include the playing fields. The field adjacent to LGS.1 is the community orchard could be deemed as part of the open countryside under the NPPF criteria and it protected under the 100-year lease to Tisbury Parish Council.

Section (Reg 14 title): Leisure, Community and Well-being

Sub-title:

Policy number (Reg 14 version): LCW.2

Reg 16 policy number: LCW.2

Comments received from: Local stakeholder (R21, comment 190).

Comments received

Tisbury is currently blessed with a number of "community" halls, including the new Nadder Centre. However, only one hall - the Victoria Hall - boasts a permanent stage which even has a proscenium arch. It is important that this facility be retained, maintained and improved as a community asset in order to further encourage the arts - particularly the performing arts. It should be noted that the hall in the Nadder Centre is a multi-function facility which is not always suitable or available for smaller productions (Local stakeholder - R21, comment 190).

How comments/concerns addressed by Submission Version of TisPlan

The cultural features of the Victoria Hall have been noted.

Section (Reg 14 title): Leisure, Community and Well-being

Sub-title:

Policy number (Reg 14 version): LCW.3

Reg 16 policy number: LCW.3

Comments received from: Local stakeholder (R4, comment 192); Developer (R32, comment 193); statutory consultee (R44, comment 194); External (R30, comment 268); (Local resident - R4, 191).

Comments received

Given the limited allocations in TisPlan it is difficult to see to what this policy would actually apply to (Developer - R32, comment 193). Does the policy apply to any development? (Statutory consultee - R44, comment 194).

If any development is proposed in Tuckingmill then footpaths to the amenities should

be part of the development. E.g. Bridlepath from West Tisbury 15 to 13a. This would provide safe access to amenities along Monmouth Hill (Local stakeholder - R4, comment 192).

Add criterion:

i) Landscaping that promotes natural features within development to actively promote well-being and provide wildlife habitat, including gardens, shared open spaces and trees.

Consider 'Round walks routes. Emphasise maintenance of linked areas of green space - for visual contemplation, for active use and the importance of tree cover to maintain the 'greenness' of the built areas (External consultee - R30, comment 268).

"Any new amenity space should be accessible for users with additional mobility needs". This could limit what is on offer from new development in the way of Footpaths (Local resident - R4, 191).

How comments/concerns addressed by Submission Version of TisPlan

The policy seeks to encourage new amenity space in all development, including gardens for smaller scale development and recreational facilities for larger scale developments "commensurate with the size of the scheme". The importance of landscaping to support the area's rural character has been included. Expansion and integration of the footpath network has been added, linking to TR.5. Amenity space for those with mobility issues is conditioned with "where feasible".

The improvements to footpaths in TR.5 has been emphasised.



# Appendices

## Appendix CS\_A. List of Groups Consulted During TisPlan's Formation and Summary of Contributions Made

Name of organisation	Organisation type	Purpose of consultation	Responded to Reg 14	Key contributions to TisPlan
Wiltshire Council	Statutory Consultee	To ensure general conformity to CS and national policy.	Yes	Conformity to Local Plan; Advisory role throughout the plan. Habitats Screening.
Highways England	Statutory Consultee	Responded to Reg 14 consultation.	Yes	No targeted comments provided.
Cranborne Chase AONB (CCAONB)	Statutory Consultee	To ensure that TisPlan considers AONB Management Plan and ambitions for AONB.	Yes	Incorporating landscape impact into design; living buildings car park or underground (policy TR4). Ensuring more prominence and local contribution of meeting the AONB Management Plan (2014-2019).
Natural England	Statutory Consultee	To provide comment on the Strategic Environmental Assessment (SEA) prepared by AECOM and/or Reg 14 document.	Yes	No targeted comments provided.
Wessex Water	Statutory Consultee	To provide comment on the Strategic Environmental Assessment (SEA) prepared by AECOM and/or Reg 14 document.	No	No targeted comments provided.
Environment Agency	Statutory Consultee	To provide comment on the Strategic Environmental Assessment (SEA) prepared by AECOM and Reg 14 document.	No	No comment received.
Historic England	Statutory Consultee	To provide comment on the Strategic Environmental Assessment (SEA) prepared by AECOM and Reg 14 document.	Yes	Provided positive feedback on TisPlan's focus on the historic environment.
Network Rail	Statutory Consultee	To understand land use needs in the future dualling of the track, timeframes and possible impact on Station Works (BL.7) and Tisbury Railway Station (TR.2)	No	Gave specific land use requirements for the station and consultation led to improved links with Network Rail.
Swallowcliffe Parish Council	Neighbouring Parish Council	Comment on Reg 14 Version.	Yes	Provided feedback on local traffic impacts arising from new development in Tisbury.

# TisPlan - Tisbury and West Tisbury Neighbourhood Plan. Consultation Statement

Ansty Parish Council	Neighbouring Parish Council	Comment on Reg 14 Version.	Yes	Provided feedback on local traffic impacts arising from new development in Tisbury.
Tisbury Parish Council	Qualifying Body	To give appropriate steer and sign off throughout the TisPlan process.	Individual members may have responded	Gave appropriate steer and sign off throughout the TisPlan process.
West Tisbury Parish Council	Parish Council jointly developing TisPlan	Directly involved with TPC (separate member?). Comment on Reg 14 Version	Yes	Individual members were involved in the development of TisPlan.
Hindon Parish Council; Chilmark Parish Council; Sutton Manderville	Neighbouring Parish Councils	To comment on Reg 14 Version.	No	No comments received
St Modwen Properties PLC	Station Works landowner/ developer	To ensure they were made aware of the strong community preferences for the site, which had arisen from the community questionnaire.	Yes	Contributing to discussions on potential viability of community preferences. Regular, transparent communication on updating community preferences for the site.
Local landowners (various)	Landowners	To invite landowners to suggest sites to come forward to be assessed as part of the site assessment process.	Individual members may have responded	Local landowners put forward a number of sites in December 2015 as part of the TisPlan call for sites. Sites were independently assessed by AECOM.
St John's School	Local primary school, Tisbury	To explore the need for expansion of the school and potential siting if population may grow with further development in the area.	Yes	School has limited classroom size but has recently added capacity to the school to accommodate a small number of students. Any further expansion may be met on the existing site of the school and the school is not looking to acquire more land on former Tisbury Sports Centre land at the present time.
Tisbury Business Association	Local business chamber	To ensure TisPlan considers the needs of local businesses.	Individual members may have responded	Retaining independent High Street and strong employment policies to support smaller businesses. Business association members were also asked to respond to the employment needs survey in Winter 2017.
Tisbury Natural History Society	Local group	To clarify environmental and biodiversity issues for the local area.	No	Contributed to natural assets in the County Wildlife Sites (CWS, Box 1).
Tisbury Arts Group	Local group	To ensure that TisPlan considers space for local creative arts.	Yes	Protecting the Victoria Hall as a community asset as a village hall with a stage.

Nadder Community Energy	Local community energy group	To include NCE on discussions on potential for renewable energy in the plan area.	No	Invited input into emerging energy policy development.
				Suggested importance of not building wind turbines in AONB.
				Suggesting community energy as a possible vehicle for future energy projects.
Tisbury Footpath Club	Local group	To ensure that TisPlan considers the current management of or expansion of local footpaths and opportunities to improve these with new development.	Yes	Suggested a number of improvements to local footpaths.
Bowling and Football club	Local group	To ensure sufficient space and protection of green space for leisure activities.	No	Protection of lower recreation ground as an LGS.
Parish of The Sacred Heart Tisbury and All Saints Wardour	Religious organisation	Responded to Reg 14 consultation.	Yes	No targeted comments provided.
Old Wardour Estate	Local estate	Responded to Reg 14 consultation.	Yes	Highlighted the need to reference the Old Wardour Park Strategic Masterplan.
Portman Healthcare, Tisbury Dental Practice	Healthcare provider	To understand possible expansion needs and alternative site.	No	No specific land use and development requirements suggested.
Tisbury Doctors	Healthcare provider	To understand possible future expansion needs	No	No specific development requirements suggested.
Tisbury Fire Station	Public service	To understand needs and appetite to relocate to ascertain the deliverability of development at the former Magistrates Court.	No	No plans to relocate in the immediate future.
Centre of Sustainable Energy	External advisory body	To understand the scope for including energy-related policies after the Deregulation Act (2015)	Yes	Provided input into Policy BL.7 (Station Works) - particularly on the need for a masterplan for the site - and BL.5 (Energy)
Gladman	Developer (national)	Responded to Reg 14 consultation.	Yes	Provided general comment on Reg 14 version.
Intel Land	Developer (land agent representing landowner for the land south of The Avenue)	Responded to Reg 14 consultation.	Yes	Suggested land south of The Avenue could meet additional housing need (NB: the site is outside of the settlement boundary).

## Appendix CS\_B. Advance Notice of Reg 14 (left)

### **TisPlan update: 'The Draft Plan' will be realised early July**

The steering group for TisPlan (Tisbury and West Tisbury's Neighbourhood Plan) has now considered the helpful feedback from the TisPlan Community Feedback Day, held at the Nadder Centre on Saturday 6<sup>th</sup> May. Here, 80 local residents commented on the policies in the 'Working Draft' of the plan, which cover five different aspects of life in the neighbourhood area:

- Housing and building
- Travel and transport
- Employment
- The Countryside and Environment
- Leisure, community and well-being

We are hoping officially to release the 'Draft Plan' for local consultation from the beginning of July to Monday, 21<sup>st</sup> August (as part of the formal 'Regulation 14' consultation). Information about how you can comment on the plan will be communicated widely and will be available on the TisPlan website at [www.tisplan.org.uk](http://www.tisplan.org.uk). The key documents that evidence the policies of the plan will also be published on the website. A hard copy will be available at several locations across Tisbury and West Tisbury, including the Nadder Centre, the Post Office and the Parish Council Offices (the old Library).

On 22<sup>nd</sup> July between 9am-1pm there will be an open morning at the Reading Room (former Library), Tisbury High Street. Steering group members will be happy to talk through the 'Draft Plan' and discuss any feedback you may have.

We look forward to your comments to improve the plan further before it is submitted to Wiltshire Council for formal examination later in the year. A referendum on whether to adopt the plan is expected in Spring 2018.

## Appendix CS\_C. Reg 14 Formal Notice



11 July 2017

[letter sent by email circulation]

Dear Sir/Madam

**Tisbury and West Tisbury Neighbourhood Plan (TisPlan)  
Statutory Consultation under Regulation 14 of the Neighbourhood Plan (General)  
Regulations 2012**

TisPlan Steering Group, working on behalf of Tisbury and West Tisbury Parish Councils, has prepared a draft Neighbourhood Plan for the two parishes (the neighbourhood area).

The consultation of the Draft TisPlan (Reg 14) will run from 10 July 2017 to 5.00 pm on Friday 8<sup>th</sup> September 2017.

The purpose of this consultation is to seek representations from Statutory and Local Consultees, whose interests may be affected by the draft proposals made. Comments made by our consultees will be considered in the preparation of our final draft plan, before it is submitted to Wiltshire Council for a further period of Statutory Consultation by the Local Planning Authority (Reg 16) and for independent examination.

We are writing to potentially interested groups and organisations as well as contacting individual residents in Tisbury and West Tisbury. If you consider that you are not the correct contact for this consultation, please pass it to the appropriate person.

A copy of the Draft Plan can be downloaded from the TisPlan website together with details of the process, supporting documents, and a consultation feedback form, go to [www.tisplan.org.uk](http://www.tisplan.org.uk). A hard copy of the plan (£10.00 to cover costs) is available on request from Tisbury Parish Clerk, email: [tisburypsc@gmail.com](mailto:tisburypsc@gmail.com) telephone 01747 260088 or alternatively, reference copies are available in Tisbury Library and Tisbury Parish Council office.

If you would like to make representation(s), please submit them using the consultation form by 5.00 pm on Friday 8<sup>th</sup> September 2017, to:-

TisPlan Steering Group  
c/o Tisbury Parish Council Office  
The Reading Room  
High Street  
Tisbury  
Wiltshire SP3 6LD

or email to [TisPlan@tisbury-biz.co.uk](mailto:TisPlan@tisbury-biz.co.uk)

Yours faithfully

*Janet Amos*

Janet Amos  
Chair, TisPlan Steering Group





TisPlan was produced by a steering group consisting of community volunteers from Tisbury and West Tisbury, all of whom share a passion for this community in which they live and work.

**TisPlan Steering Group:** Janet Amos (Chair) Paul Colebourne, Simon Davison, George Flower, Simon Fowler, Robert Hill, Ione Lacey, Michael Neal, Nigel Noyle, and Claire Witham.

**Policy writing:** TisPlan Steering Group, assisted by Nicola Duke, Amy Burnett and Jo Witherden

**Design:** Amy Burnett and Rosalind Russell

**Supporting Text:** Janet Amos and Amy Burnett

**Photographs:** Jonathan Amos, unless otherwise stated

**Advice:** Natasha Styles, Wiltshire Council Link Officer and Jo Witherden, Independent Consultant.

**Technical Support:** AECOM Consultants.

