

Response from Tisbury Parish Council to Wiltshire Local Plan Consultation 8th March 2021

Empowering Rural Communities	
Question Number	
1	<p>We strongly agree that in the rural areas, there must be a minimum of 40% affordable homes in all new development schemes of 5 or more dwellings. Paragraph 18, however, suggests that it should be a target of 40%, “wherever possible”.</p> <p>We disagree with the implied loophole that in certain circumstances, economic viability would take precedence over the provision of 40% affordable homes. If a developer’s argument is that a site would not be economically viable without a higher percentage of market rate housing, then planning permission should not be granted.</p> <p>There may be other creative ways of achieving the 40% affordable housing requirement, for example: working with a Community Land Trust to offset market rate housing in a location inside the housing policy boundary by the provision of 100% Affordable Housing in a nearby exception site, if by doing so, it would meet the identified needs of the local community.</p>
2	<p>We have some support in principle for trying to find a mechanism to prevent creeping extension or replacement of small starter homes so that they are no longer the entry-level homes that were intended when they were first built.</p> <p>The evidence is already there for all to see. In Tisbury, it has most definitely been an issue during the last 30 years. Many of the small 2 bedroom houses built as starter homes in the 1980’s have been extended, (despite protestations from the local parish council) so that many now have 3 bedrooms, utility room extensions, conservatories and home offices. The base number of starter homes has been seriously eroded and the community is moving out of balance. However, whilst the housing market is so very expensive, it is not surprising that homeowners are choosing to extend their current properties rather than face the costs of moving.</p> <p>We suggest that the only appropriate mechanism for retaining entry level small dwellings is via Community Led Housing schemes and Affordable Homes, all of which will need to be covenanted and/or subjected to stringent planning conditions, so that they may not be sold into the open market and may not be extended or replaced with larger dwellings.</p>

	<p>For future open market developments, it may be worth considering housing density as the controlling criterion – terraced properties and dwellings with small outside spaces will be relatively unsuitable for extension and the question of permitted development will not arise.</p>
3	<p>Revised Core Policy 44</p> <p>We broadly welcome the provisions of the proposed revisions to Core Policy 44, but with the following additional comments:</p> <p>Condition i) This needs to be strengthened. What sort of evidence would be considered sufficient to be defined as “clear community support evidenced through consultation”? There is potential here for unscrupulous developers to manipulate such evidence. How “local” is the local community? It needs to be made clear that evidence will only be acceptable if it has been collated impartially by the local parish council and/or the neighbourhood planning team and is free from developer involvement.</p> <p>Condition iii) In the most rural of small settlements, this condition could preclude the development of an otherwise entirely appropriate exception site (eg a small brownfield site of derelict barns). The word “preferably” should be inserted viz: <i>.... preferably without reliance on travel by private car</i>” The provision of public transport in Wiltshire’s rural areas is so spartan that it would otherwise be almost impossible ever to permit the development of a small affordable housing exception site.</p> <p>Condition v) The phrasing of this condition is somewhat bizarre and is confusing at first reading. It should be amended to read: <i>The proposal consists of a minimum of 5, but not more than 20 dwellings, and in any event will be no greater than 5% of the size of the settlement.</i></p> <p>In addition, the Policy needs to make a definitive statement with reference to the Council’s proposals to preclude permitted development in properties on rural exception sites and community led housing.</p> <p>We strongly support the commitment to Community Led Housing and the involvement of Community Land Trusts.</p> <p>For Community Led Housing, the Council must be flexible, within the law, in its housing allocations policy, to ensure that it is the Local Community that benefits. We should like to see amendments to the Housing Allocations Policy to ensure that these aspirations are met</p>

	<p>appropriately. We are increasingly aware of local residents who are being excluded from the Homes4Wiltshire register.</p>
4	<p>New Core Policy</p> <p>Housing requirements for Neighbourhood Area Designations in the Rural Area</p> <p>We are broadly in favour of the rationale which defines the allocation of housing requirements for the Local Service Centres and Large Villages. The allocation for Tisbury LSC seems sufficient and reasonable.</p> <p>However – we are very concerned that Paragraph 56 offers a major loophole to developers looking to build on Greenfield Sites outside the Housing Policy Boundary. The criteria need to be strengthened. What does “<i>an understanding of local housing needs</i>” actually mean?</p> <p>Paragraph 56 suggests that there may be exceptions to planning controls on greenfield land adjoining settlements usually as a Community Led project which might include an element of affordable housing. This is not good enough.</p> <p>The Council needs to make the situation absolutely clear: Development will NOT be permitted on Greenfield sites outside the housing policy boundaries, unless the proposals are to meet affordable housing needs, evidenced by support from the local community via their parish council or the neighbourhood plan.</p>
Paragraph	Responses to other sections of the document
53	Ongoing monitoring of allocated sites: The Council needs to take more responsibility for working with landowners and developers in order to ensure that sites allocated by communities are developed appropriately to meet the needs of that community. This is an essential task for the principal authority and it is not beholden on the voluntary sector to progress these sites.
55 & 60	The template housing needs survey provided by Wiltshire Council is not fit for purpose. It needs to be re-written, in plain English, by professional designers of questionnaires. The current questionnaire is confusing and contradictory and does not generate reliable quality information.
87	<p>What PRECISELY is the meaning of this paragraph?</p> <p><i>A 100m buffer has now been added to each settlement boundary to ensure that their relationship with constraints in the immediate surrounds are also captured in case it is appropriate to consider greenfield sites adjacent to settlements for development when planning for growth. This does not, however, mean that development in these areas outside of the defined limits of development are automatically considered acceptable.</i></p> <p>This paragraph is so badly written that it actually means nothing, other than it offers the green light developers will be looking for, to ride a coach and horses through the Local Plan.</p>

	The paragraph needs to be re-written in plain English to explain what precisely it does mean, even if it results in the use of more full stops and clearer punctuation.
Strategic Retail Review	
	Tisbury Parish Council broadly welcomes the aims and objectives of this retail review, although we note that it was carried out in 2017 and is already out of date. Since 2017, Tisbury High St has already lost some commercial space to conversion to dwellings, with very little evidence of resistance from Wiltshire Council, despite protestations from the Parish Council. Strengthened policies via the Local Plan are necessary to support the retail and commercial offer in the local High Streets.
Addressing Climate Change and Biodiversity Net Gain	
Question number	
A1	It may well be that Land-use policies of themselves will not be sufficient to make a significant difference to carbon emission trends before 2030, but that is not a reason not to do anything. The Council has to recognise its responsibility to set an example with its own policies and procedures; and to ensure that Land-use policies are so phrased in order to at least make a contribution towards Climate objectives.
A2	At the very least, ensure that all policies and procedures are all in alignment and that every employee in every department understands the contribution they can make. The Council needs to ensure that it underpins a positive climate-friendly culture throughout the whole organisation, otherwise there will be a perception of “do as we say but not as we do” which would not be healthy.
A3	It is for the directors of every department to ensure that Climate-friendly policies and procedures are defined and implemented throughout the organisation. Every member of the Council should be able to contribute to a culture of reduce, re-use and recycle.
B1	No – the proposed Policy Theme 1 is full of “get-out clauses”, essentially enabling developers to do exactly as they please. The measures do not go nearly far enough. The words “ <i>should</i> ” and “ <i>could</i> ” must be replaced by “ <i>must</i> ” and “ <i>will</i> ”. Remove all references to “ <i>where technically feasible</i> ”. If a developer argues that a particular development will not be technically feasible, then planning permission should not be granted and should be refused. Developers need to understand that they cannot continue to hold communities to ransom.
B2	Again – Policy Theme 2 is weakened by the use of the word “ <i>should</i> ”. Replace “ <i>should</i> ” with “ <i>must</i> ” and then the policy might have a better chance of success.

B3	Again – Policy Theme 3 is weakened by the use of the word “ <i>should</i> ” and “ <i>could</i> .” Replace “ <i>should and could</i> ” with “ <i>must and will</i> ” and then the policy might have a better chance of success. Developers will always argue the case for the cheaper option. Unless higher standards are demanded of them, they will continue to ignore UKGBC objectives and targets.
B4	The Council has an opportunity to set high standards. If it doesn’t water down its policies with pathetic words like “ <i>should</i> ” then net zero targets ought to be achievable. Possibly a phasing-in policy during the first few years of the Local Plan might be helpful if agreed through S106-style agreements.
B5	Developers may well argue that net zero targets will affect scheme viability. Tough on the developers. They have to recognise that they must take responsibility for their actions and they can’t carry on destroying the planet.
B6	There is no excuse for not implementing the highest possible standards of building control.
B7	Retrofitting and modernising of the existing housing stock is already supported by Government grants. The Council could help to promote greater uptake by ensuring wide publicity eg promotional and information leaflets sent with every Council Tax demand letter. Educate house-holders with worked examples of typical costs and benefits of retrofitting.
B8	The policy needs to be strengthened by greater insistence that measures will be implemented. Delete “ <i>should</i> ” and replace with “ <i>must</i> ”.
B9	There is no harm in encouraging all appropriate “green” technologies but the Council must beware of “false” green initiatives, such as supporting the implementation of biomass wood-pellet burners which use imported wood pellets transported from half-way across the world.
B10	At the very least, the Council should set minimum targets.
B11	At a purely pragmatic level, there will have to be a recognition that retrofitting may not always be appropriate for some truly historic properties. Wiltshire has many listed buildings and other iconic non-listed properties. Rather than insisting on the retrofitting of sixteenth-century cottages, it is surely more important to concentrate on the implementation of high standards for all new development. If applications come forward for extensions and alterations to historic properties, then a conversation about carbon-friendly initiatives can be held at that time.
B12	Yes – the aspirations are good but the policy does not go far enough. Wiltshire Council has to recognise that it has to support improved provision of both quality Broadband infrastructure and the public transport network, if it really wants to achieve a reduction in the use of the private car.
B13	1. Insist on electric charging points in all new developments

	<ol style="list-style-type: none"> 2. Implement a policy of a minimum of 2 independently accessible parking places per new dwelling, in recognition that nearly every household does have more than one car and it is necessary to get those cars off the roads – then it will be feasible to – 3. Install traffic calming measures in all new developments to make driving uncomfortable; widen the pavements and make space for safer cycling. 4. Make more and better provision for cycle storage in Council owned public spaces; car parks etc. Liaise with the rail authorities to encourage better provision for bicycle storage. Liaise with the bus companies to ensure joined-up timetables for the buses and trains.
B14	Make land available for Distribution network and service operators to install electric charging points. Streamline the administrative process.
B15	<p>This question is not written in English.</p> <p>However, if developers try to argue that scheme viability is threatened by requirements to build to zero-carbon standards, then refuse to grant planning permission. They will soon find ways of achieving the required standards.</p>
General Feedback on the Local Plan consultation process	
Timing	Along with other similar bodies we have requested an extension to this consultation process. Many of the interested parties are unpaid volunteers giving of their own time. Allowing only 5 weeks between the initial briefing and submission deadline is simply inadequate and fails to recognise and value the role of the parish councils. Many parish councils for instance may only meet once per month. We therefore respectfully suggest that this consultation has at best been poorly planned and at worst is biased against the volunteer community.
Access and Discrimination	We are struggling to discover where facility has been provided for those without internet access to respond to this consultation. We note that there is an option to request the provision of hard copies of the consultation documents – but that facility is buried in the documentation, which is only available online. This is discriminatory.
Lack of Maps	We have found it difficult to pinpoint the defined areas mentioned, without the inclusion of easily referenced maps in the documents and without online links to the relevant maps. In our particular case, we have a housing target allocated to Tisbury, as the local service centre. We have no clear indication of the geographic boundaries of this area and we have been forced to assume that the Local Service Centre is defined by the housing policy boundary – which, we believe, is itself not officially adopted, as the map on the Wiltshire Council website still says that the revised map is a draft.
Location definitions and	The Housing requirement calculation for Tisbury uses the Local service Centre as the relevant entity. In the threshold for Affordable housing

indicative housing requirement calculations	<p>calculation the entity is clearly stated as the Parish. We know the boundaries of the Parish . We do not have confirmation of the physical boundaries of the Local Service Centre, although as stated above, we assume the LSC equates to the area of housing policy boundaries. It should be noted that the boundaries of Tisbury Parish are not the same as the housing policy boundaries, which include parts of West Tisbury Parish and exclude parts of Tisbury Parish.</p> <p>We are very grateful to Louise Tilsed for her quite brilliant explanation in writing to us of the housing requirement algorithm. Louise is clearly very expert in this field. The rest of us are not and a much simpler explanation should have been provided in the Local Plan documentation. Even Louise does not explain the derivation of the baseline for Large Service Centres of 100 homes ie 5 per year over the period of the plan. How was that figure determined?</p> <p>Our understanding of Louise's explanation for Tisbury Service Centre is that our allocated requirement over the period of the plan is 135 dwellings. With 70 already produced or committed since 2016, the outstanding balance is 65 . We do find this acceptable, but once again we would like confirmation of the geographic area it refers to as "Tisbury Service Centre" as it is different from the Parish boundaries.</p>
Affordable Housing Requirement and Threshold	<p>We support the 40% level of affordable housing provision in this rural community. We support the creation of rural entities where the threshold for affordable housing provision is a development 5 dwellings. We expect Tisbury to be one of these entities.</p>
Neighbourhood Planning and the 5 Year Housing Supply	<p>The consultation documents refer continually to neighbourhood plans and their importance. However, Neighbourhood Planning will cease in Wiltshire if the Council is unable to properly manage the 5 year housing land supply.</p> <p>These construction of these plans require enormous commitment and giving of time by volunteers and they will not continue to do so, if plans can be over-ruled after just 2 years. It would be appropriate to see some recognition of the Council's responsibility in this regard in the local plan.</p> <p>This is a matter of paramount importance and Wiltshire Council needs to recognise its role in liaising proactively with land-owners, to bring allocated land forward for development.</p>