

Wiltshire Core Strategy Consultation Document (June 2011)

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You can use the comments boxes on page two of this form to answer the questions in the *Wiltshire Core Strategy Consultation Document*. If you need to make extra copies of page 2, please attach them and any supporting material to this form.

- Please complete this form and return by post or email to the address below, or
- Go to www.wiltshire.gov.uk/wcsconsult2011 and use our online consultation system
- Please submit all comments by **5pm on Monday 8th August 2011**.

If you have any queries, please contact the Spatial Planning Service using the details below.

By post to:

**Spatial Planning,
Economy and Enterprise,
Wiltshire Council,
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Bythesea Road,
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Or, by telephone on **01225 713223**, or email at spatialplanningpolicy@wiltshire.gov.uk.

Your comments:

(Please use a separate box for each comment)

To which part of the *Wiltshire Core Strategy Consultation Document* does your comment relate?

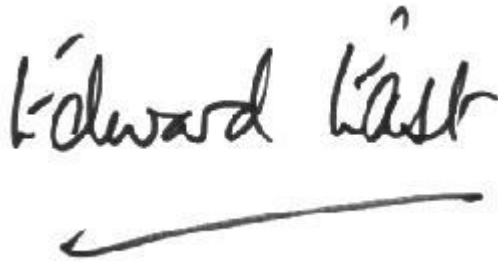
Chapter: Question: Paragraph: Community Area:

Comments:

Please see attached separate sheets for all comments on the whole document.

Answers to the specific questions are in italics.

(Please continue on a separate sheet if necessary)

Signature:		Date:	4/08/2011
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Comments by The Trust for Devizes

General

The quantity of documentation in this consultation is excessive and makes comprehensive comment on the whole of it impossible within the time and resource available. Comments are therefore limited to a few key issues and focussed on the Devizes area.

A more carefully considered and more concise document, limited to proposals that are realistic and achievable, would have been preferable. The approach should be quality rather than quantity. It is an error in the management of the planning system to have allowed such documents to have been produced for public consultation.

The overall impression is a mass of documents filled with undigested utopian ideals and wishful thinking. There are inherent conflicts and contradictions within the documents because they contain so much. The key objectives are an unselective list of all that could be considered as possible, rather than what priorities are realistically achievable. There is no indication of how any of the desired outcomes could actually be achieved and no specific actions are proposed to achieve the desired objectives.

There is much reliance on jargon words to give the impression of sound policies and proposals, but they often do not bear detailed consideration. The terms "sustainability" and "resilient communities" are used frequently in an attempt to confer respectability on some dubious concepts and proposals. The very terms are ill-defined and questionable.

Sustainable development is defined in the Appendix as development that meets the needs of the present without comprising the ability of future generations to meet their own needs. That definition is vague and it would fit almost any situation. Who can tell what the needs of future generations might be? Certainly not the planners, who have conspicuously failed over recent decades to plan for today.

There does not appear to be a definition of resilient communities, which is not acceptable when it is a theme constantly used throughout the document. Presumably it means communities that can cope with whatever is imposed on them. Para 1.10 states:

"Underpinning this strategy is the delivery of resilient communities through boosting the economy in order to achieve a greater level of self containment in settlements and provide the jobs locally that Wiltshire's communities need."

That implies that resilience basically requires community self-containment. That is doubtful. What may be more important as a test of resilience is that a community remains as an attractive place to live from decade to decade. Although the Devizes Area as a whole remains an attractive place to live, it is relatively less attractive than it was 15 years ago, which implies that its resilience has been undermined by past planning policies.

For a rural county, it is surprising that agriculture does not feature in the document.

There is much importance placed on localism, the views of local communities and the production of neighbourhood plans. Wiltshire Council has not shown itself to be adept at considering local views. It needs to change its attitude if the stated objectives are to be achieved and our communities are to be truly resilient.

Chapter 1

This chapter begins relatively well. Para. 1.3 in particular identifies a key problem:

“The strategy recognises that previous growth hasn’t always been delivered in a proportionate manner whereby housing has been delivered in settlements where there are insufficient employment opportunities leading to out-commuting. Perhaps the key message from our communities during the preparation of this document was that whilst there was an understanding of the need for new homes there was little appetite for more homes, without the imbalance in local jobs and the infrastructure required to support growth being addressed. The strategy is therefore to redress this imbalance and support a more sustainable pattern of development within Wiltshire.”

It is a pity that the remaining documentation gives no confidence that the problem can be satisfactorily addressed. The consultation document is full of desirable aims but short on realistic ideas on how they can be attained. It is evident that the policies of the past 15 years have made life worse for people in Wiltshire in many respects. There is now a significant infrastructure deficit.

The great amount of housing built without the infrastructure essentials has reduced the sustainability and the resilience of communities because it has drawn people into the County from elsewhere and arguably compounded the problems.

Tourism and its great economic potential has been neglected, perhaps because there is currently no policy or vision for how it can be developed. Tourism policy has been focussed on a few existing sites in favoured areas instead of seeing it as a county-wide industry with great potential.

Paragraph 1.4 states,

“1.4 There are a number of key principles which underpin the proposed strategy to help build more resilient communities, as follows:”

This paragraph is unrealistic when taken as a whole. Resilience should be defined here if it is such a basic requirement. Is resilience considered to be dependent on sustainability, or has the jargon got in the way of intelligent thought? Commenting on the bullet points:

- Providing for the most sustainable pattern of development that minimises the need to travel and maximises the potential to use sustainable transport.

There is no indication how this could be achieved. There are many reasons why modern life requires travel for social or recreational reasons and for work. Families tend to be far more geographically widespread today and, as people live longer, that trend will increase. Housing estates are no longer clustered around a single employer and people are forced to change jobs many times in their lives, often necessitating commuting over large distances because moving house has become difficult and costly for many reasons. In larger towns and cities there is a variety of employment opportunity within reach by public transport and higher population density makes it more economic and sustainable. It follows that development should be more focussed on the major centres of population that can sustain public transport. The population growth in smaller towns in the past 15 years has led to a big increase in commuting to the larger towns because that is where the better jobs can be found. In more rural areas public transport is uneconomic and unsustainable; it is the small family car that has become the sustainable mode of transport for rural areas.

- Creating the right environment to deliver economic growth, delivering the jobs Wiltshire’s

population needs locally, and taking a flexible and responsive approach to employment land delivery.

The implication here is that the right environment can be delivered. That has not been the case in the past, how is the future to be different? There is no statement as to what the right environment is or how it can be created.

- Phasing development to ensure that jobs and the right infrastructure are delivered at the right time to ensure that out-commuting, in particular to areas outside of Wiltshire, is not increased and development does not have a detrimental impact on infrastructure.

This is an issue of planning; creating the infrastructure prior to building houses. This is contrary to past planning practice and in some areas, such as Devizes, there is a serious infrastructure deficit. Can the policy be changed for the future? Politics and economics may work against that if the current Localism Bill becomes an Act and developers are even less controlled in the future. The reference to out-commuting to areas outside Wiltshire is misconceived; the problem for Devizes is out-commuting to other Wiltshire towns. It is also difficult to see why the desirable objective of ensuring that development does not have a detrimental impact on infrastructure is linked to the statement about out-commuting.

- Working towards lowering Wiltshire's carbon footprint through providing renewable energy, sustainable construction and location of development.

This is probably unrealistic and not a suitable key principle for building resilient communities. Wiltshire is not well placed to make a significant contribution to the provision of renewable energy. It has no large rivers and no upland consistently windy areas that are not protected landscape. Its agricultural land could be used to produce biomass crops but that would not be a good use of fertile land. Sustainable construction and a reduced carbon footprint are not necessarily compatible. The main driver for reducing the carbon footprint is energy cost and the Government is driving up energy costs in various ways and Wiltshire Council is not likely to be able to make a significant difference.

- Protecting and planning for the enhancement of the environment, wherever possible, including development of green infrastructure to support the health and wellbeing of communities.

This is a vital element of good planning that has been seriously neglected in the past, leading to a loss of sustainability and resilience in our communities! Wiltshire Council has suddenly, belatedly woken up to this principle and it will need a total change of the planning mindset. Can that be done?

- Providing high quality, well designed development, and ensuring full local community involvement in planning for significant new proposals.

This is a very desirable objective. Again it is far removed from past practice. There has been no overall planning to ensure that developments take place together with the essential infrastructure in the past 15 years. In the Devizes Area, we have extensive new housing but it has been built on an incremental basis without essential road improvements, without new green or open spaces, without local facilities (e.g. small shops, sub-post offices, community rooms). Utility services have not been planned and this has led to piecemeal, ad hoc reinforcements and endless disruptive roadworks. Each phase of development has been permitted on the basis that it is only a small increment and does not in itself warrant any major infrastructure works. Unless the whole of the infrastructure is planned in advance, the pattern will be repeated in the future. The essential principle should be that housing development cannot go ahead if the infrastructure is lacking. In addition, much of the housing developments have been of a high density that is suited to urban areas but not to more rural communities. It is not good enough simply to propose well designed development without recognising how it is to be achieved. As was the case for a previous key principle that linked out-commuting with detriment to infrastructure, the quality of design and full local community involvement are separate issues that should not be lumped together in this

manner. The principle of full local community involvement and how it could be achieved requires explanation in the document.

- Providing the framework to deliver Neighbourhood Plans.

It remains to be seen if the centralist tendency at Wiltshire Council can be overcome and local opinions can be accepted. It is feared that Neighbourhood Plans could become a vehicle for unfettered and detrimental developments.

Paras. 1.5 to 1.9 appear to be padding that adds nothing of value.

One important possibility that has apparently not been considered and which could deliver the strategic requirements without compromise is the New Town concept. For instance, the area around Ludgershall is close to a major primary road, the A303, has a rail head that connects into a main line between London and Salisbury, has no shortage of land and even has a small airfield at Thruxton.

Chapter 3.

Having listed the key strategic objectives for Wiltshire in this Chapter it is odd that they are not clearly linked to specific delivery actions listed in Chapter 4. Again, it is an idealised list which is of very limited value without a clear plan for achieving them. Apart from Objective 2, they are reasonable.

Objective 2 "to address climate change" is woolly, perhaps deliberately so, is probably not appropriate and is not a realistic key objective for Wiltshire. It is apparently there for political reasons.

Objective 9 "to ensure that infrastructure is in place to support our communities." is long overdue and there is much catching up to be done from past neglect of infrastructure. Section 3.12 lists ten key outcomes as bullet points. It is fair to state that these are important planning requirements to ensure the desired sustainable and resilient communities. The planners have conspicuously failed to deliver these objectives in the past and communities are currently suffering the results of excessive housing developments without this infrastructure. ***If this consultation exercise achieves nothing else whatsoever it should aim to ensure that this shameful history is not repeated in the next fifteen years.***

Chapter 4.

It is difficult to directly relate this Chapter to the strategic objectives set out in Chapter 3. It should describe specific actions which would achieve the objectives rather than continuing with a wish list approach.

The Chapter begins with the statement:

"The spatial strategy makes provision for the growth of around 27,000 jobsand around 37,000 new homes. ... to achieve a better balance between jobs and homes, delivering appropriate and sustainable levels of development to best meet the future needs of Wiltshire's communities."

The first part is questionable. 37,000 new homes will presumably require many more than 27,000 jobs, unless it is assumed that existing households contain many additional adults who require and can afford a new home, many of the homes are for retired people who are not already resident in Wiltshire and that only one person per household requires employment. It also neglects existing imbalances between homes and jobs which has led to the out-commuting from Wiltshire referred

to in Paragraph 1.4 .

The second part refers to the delivery of appropriate and sustainable levels of development. There is no indication of how that will be done, belying the title of the Chapter.

Core Policy 1 includes the statement:

“Market Towns

Outside the Principal Settlements, Market Towns are defined as settlements that have the ability to support sustainable patterns of living in Wiltshire through their current levels of facilities, services and employment opportunities. Market Towns will be the focus of locally significant development that will increase the jobs and homes in each town in order to help sustain and where necessary enhance their services and facilities and promote better levels of self containment and viable sustainable communities.”

Considering Devizes, it is fair to say that the above statement is demonstrably untrue at present and it is hard to see how the proposed planning policies will make the situation any better. The growth in population in recent decades without a corresponding increase in local facilities, due to excessive housing developments without any infrastructure planning, has reduced the sustainability and resilience of the town and adjacent parishes. Large local estates on the outskirts of the town have been developed without thought of local facilities other than minimalist small childrens’ play areas. There have been no road developments to enable traffic to move reasonably freely. Air pollution from traffic is now a significant health problem in the town centre. Medical facilities have been generally reduced rather than enhanced. The Devizes area seriously lacks the kind of publicly accessible green leisure spaces that are essential to health and well-being.

All the new housing developed in the Devizes area in the past fifteen years has actually added to local problems, including the lack of affordable housing, by drawing in large numbers of people from other parts of the country. Is the demand for affordable housing more than, say, ten years ago or less now? Development has not provided the financial resources to solve the majority of our infrastructure problems, contrary to the bizarre opinions of some County Councillors. It is not likely that future developments would be able to finance the essential infrastructure while still providing the financial returns required by the developers.

Question 1

Do you agree with the proposed settlement strategy set out in Core Policy 1? Are there any changes that you would suggest?

*Core policy 1 is concerned with the policies for the defined groups of settlements. Market Towns are defined as settlements able to support sustainable patterns of living through their current levels of facilities, services and employment facilities. That is not the current situation in Devizes because the infrastructure has not been developed in line with the excessive housing developments of the last 15 years. It is now essential that no new housing developments are permitted **before** the essential infrastructure is in place and the air pollution problem is rectified.*

Question 2

Do you agree with the proposed delivery strategy set out in Core Policy 2? Are there any changes that you would suggest?

Core policy 2 is concerned with development in a sustainable manner. There is a need for good quality employment in the Devizes area to reduce the current outward flow of commuters and to boost local average wage levels. Employment development is desirable provided that can be done together with the all the necessary infrastructure. For example, employers will not be attracted to locations where transport is a major problem. It must be recognised that Devizes is central in Wiltshire, probably the most remote of the market towns, with a poor road infrastructure, poor road connections to the major national road network and no rail connection. It should therefore

*not be considered as a likely location for significant employment growth but it may attract some specialist employers. The potential contribution of tourism to the economy should be recognised. Encouraging tourism would increase local employment without putting large demands on new land areas. Devizes is well placed in the centre of Wiltshire to form a hub for tourism for the whole of the County and not just the obvious attractions of Salisbury and Stonehenge. **The closure of valuable tourist information centres in the market towns is a serious policy error.***

There is an inherent contradiction between the plans for expansion in housing and employment and the recognition of the need to provide essential infrastructure. Because that infrastructure has been seriously neglected in the past, it is necessary to strictly restrict growth in the interests of sustainability or the resulting conflicts will be even more difficult to resolve.

Proposals for involving local communities in the planning process for significant developments, referred to in paragraph 1.4, must be better developed and implemented.

Question 3

Do you agree with the proposed approach to securing infrastructure set out in Core Policy 3? Are there any changes that you would suggest?

*Core policy 3 is concerned with the provision of infrastructure. This is satisfactory in principle but it is doubtful that it can be implemented. The problem which has not been recognised here is that there is now a significant deficit in infrastructure development in towns such as Devizes where excessive housing development has taken place in the past 15 years without the essential or desirable infrastructure. New developers will not be willing or able to make a contribution to eliminating that backlog. New development should not go ahead before there is an adequate infrastructure in place, so there is a gap in this policy that needs to be addressed. **There should be no planned housing development whatsoever in the Devizes area until the air pollution problem in the town centre has been successfully tackled.***

Chapter 5. 5.8 Devizes Community Area Strategy.

5.8.3 Suggests that Devizes is a suitable strategic employment centre. It does recognise that past employment growth has tended to be small to medium businesses catering for local networks. In addition, Devizes suffers from poor transport links to the national strategic road network, significant traffic congestion at times and has no rail connection. It is not known for having a good pool of highly educated or highly skilled labour, most local people work in relatively low paid service industries and local state education standards are perhaps adequate rather than first class. It may well continue to attract a wide range of smaller industries, in the IT and specialist furniture manufacturing sectors say, but is unlikely to attract larger industries that rely on a good transport infrastructure. It is therefore not a good location for strategic employment growth to support a wider area.

5.8.4 Refers to the retail sector. Devizes is mostly liked by shoppers for its range of individual smaller and specialist shops. The existence of smaller branches of the likes of Tesco and Marks and Spencer brings in people from outlying villages but is not an attraction to people from further afield. Any attempt to bring in larger branches of national retailers would destroy the special character of the town. Previous proposals to develop on the central car parks to attract such retailers are mistaken and would be very damaging to the character and amenities of the town and should be strongly resisted. Lack of parking space close to the shops and high parking charges are detrimental to the local economy, as has now been recognised by central government. In recent years, shoppers from other Wiltshire towns are known to have been deterred from visiting Devizes because of its traffic congestion. Seriously long delays can occur whenever accidents or road works add to the normal traffic congestion because of the inadequate road infrastructure.

5.8.5 The traffic model has been discredited and it is overdue for updating. The result of failure to recognise the problems created by additional housing developments has led to a serious traffic

and air pollution situation. Changes to junctions, euphemistically called “upgrades” will only serve to move congestion from one point to another and will do nothing to solve the basic problem. They would be a waste of money and there is no proven, scientific basis for suggesting that they would provide some alleviation.

5.8.6 This section is wishful thinking without proposing any particular actions that would bring about the suggested objectives. The upgrading of the town's infrastructure to bring it more into line with the existing level of population would do far more to ensure that the community remains resilient than any planned new housing. The statement, “development will have had regard to capacity constraints within the town's road network and air quality” **if taken seriously**, does mean that there should be no more planned housing until the air quality can be restored to within the legal limits.

Question 12.

Are there any changes that you would suggest to the spatial strategy set out for Devizes Community Area in Core Policy 12?

Are there additional infrastructure requirements needed to support development in Devizes Community Area?

Core policy 12 is concerned with development strategy for the Devizes Community Area. Much of this is covered by the answers to Questions 1, 2 and 3 above. In particular, the planned housing allocation must be reduced to zero until the air quality can be shown to be able to be restored to within the legal limits.

The proposals for traffic demand management amount to no more than altering the layout at junctions and additional traffic lights. Such schemes are likely to be a waste of money and would result in moving traffic queues from one point to another without solving the basic problems. No traffic management schemes should be designed or implemented until a new and competent traffic model is available.

Chapter 6.

This Chapter is long on policies but short on how they can actually be delivered.

6.1 SO1: to deliver a thriving economy which provides a range of job opportunities

This section contains a core policy: Core Policy 21 - Additional employment land.

Proposals for additional employment development (use classes B1, B2 or B8) within or adjacent to the principal settlements and market towns will be considered against the following principles:

1. the proposed employment uses support the vision, role and function of the town, as identified in Core Policy 1 and in any future Neighbourhood Plan or similar planning document where applicable.
2. the new site facilitates the relocation and expansion of an existing employer whose premises are outdated and its extension and improvement cannot be accommodated within the existing site, or on adjacent land.
3. the proposed site will be attractive to key target sectors in the Wiltshire economy and have a reasonable prospect of coming forward for development.
4. the proposed site will be served by a realistic choice of means of transport.
5. the proposed site is well connected to the primary road network without passing through residential areas.

Considering principle 1 it is worth reiterating part of the answer to Question 1:

Market Towns are defined as settlements able to support sustainable patterns of living through their current levels of facilities, services and employment facilities. That is not the current situation in Devizes because the infrastructure has not been developed in line with the excessive housing

developments of the last 15 years.

It is evident that the infrastructure of the Devizes Area may not be suitable to support any significant increase in employment and it should not be designated a strategic employment growth area. See comment on 5.8.5 above.

Considering principle 4, it is difficult to see that it has any worthwhile meaning in the context of the Devizes Area as the road transport infrastructure has severe limitations both within and without the Area. Indeed it may not be of value as a principle at all; if a proposed site has no realistic choice of means of transport it should not be considered in the first place.

Considering principle 5, the Devizes Area should certainly be excluded as an area for strategic employment growth. Devizes is in the geographical centre of Wiltshire and probably the settlement most remote from the primary road network, which is situated on the periphery of the County. The 'A' class roads to and from Devizes have basically not been upgraded in a century, are not suitable for large, modern commercial vehicles and pass through the residential parts of other settlements where there are serious bottlenecks due to narrow roads. The proposed strategic employment sites may be on the outskirts of Devizes but a significant proportion of the commercial traffic to and from those sites would pass through the residential roads of Devizes. The main through route exits from the town, such as London Road, Nursteed Road, Bath Road and Potterne Road are all residential, restricted in width in places and frequently congested.

6.2 SO2: to address climate change

This section is not realistic. It contains unrealistic targets and assumptions and inherent contradictions. There are no proposals for the sources of funding. It is not probable that the Government or Wiltshire Council will have funds available on the scale required. Private funds will be available only where energy users can see an economic return.

Some renewable technologies are funded by subsidies, such as the feed-in tariff for solar energy which is effectively a tax on electricity users. These may not be sustainable as the costs of electricity continue to rise and consumers begin to object. In addition, Government policies change too frequently and it is not possible to be sure that investments are risk free.

Much of the Wiltshire landscape is in a protected category, such as AONB, particularly the higher areas where wind energy could otherwise be considered.

6.4 SO4: to help build resilient communities

This section focuses on retaining existing facilities and infrastructure but fails to recognise that many new housing developments have been permitted in recent decades without making provision for those facilities which are essential to resilient communities. There is now a backlog of infrastructure provision in some areas. Part of the essential infrastructure for a truly resilient community is open space. Open green spaces are essential to the health and well-being of communities. Devizes and the newly developed parts of the surrounding parishes now have less public green spaces than many large towns and cities, which represents a major failure of past planning.

6.5 SO5: to protect and enhance the natural environment

This section focuses on specific areas that have been previously identified. It fails to recognise that incremental urban sprawl, as towns grow through piecemeal developments, can destroy their natural environment and character. Devizes has been allowed to grow outwards for decades with no thought for the preservation of green space. There is now a serious lack of public open space and green space. There is a need for areas to be preserved as future parkland, even if the funds to create parks are lacking at present. It may also be possible to establish a green belt to prevent continued urban sprawl and the merging of communities.

6.6 SO6: to safeguard and promote a high quality built and historic environment

Recent developments have shown a depressing tendency towards the kind of high densities that

are characteristic of major towns and cities and not of rural market towns. Small gardens lead to lack of privacy and children seek play areas in unsuitable locations. Gardens traditionally have contributed to biodiversity by providing natural habitats. The small gardens associated with many modern housing estates tend to lack natural habitats. Lack of parking spaces leads to parking on pavements (which is prevalent in recent estates) and to social conflicts within communities.

6.9 SO9: to ensure that infrastructure is in place to support our communities

This is a very important objective but it is notable that this section is devoid of useful content! It is an area that has been seriously neglected in the past while too much emphasis has been placed on house building, to the detriment of the health and well-being of our communities.

Chapter 6 Objectives- further comments.

In addition to the above comments, a trustee of the trust for Devizes has worked through the ten key objectives as listed in section 3 the document and would add the following comments.

In Objective 1 the statement is made that out-commuting will have been addressed, yet it is planned to build 37,000 new homes whilst providing only 27,000 new jobs. We can expect the new homes to be occupied by 88,000 people of whom at least 50% will require a job. That would suggest that out-commuting will have to increase, since the jobs required will not be available in Wiltshire.

Also in Objective 1 we are told that Wiltshire's tourism industry will have grown in a sustainable way. This is of great interest to Devizes, which is a considerable tourist attraction yet is being damaged by high levels of traffic congestion. In quite what sustainable way our tourism will increase, we are not told.

In Objective 2, increasing self-containment is a key outcome. Such a policy requires a reduction in the number out-commuting from the market towns and an improved retail offering to persuade people to shop locally. We have already addressed the problem of out-commuting posed by additional homes being built. We would also add that there is an additional problem in Devizes which is matching employment opportunities to house prices. Many of the homes which have been built in recent years have been unaffordable to the people filling the job vacancies in the town, which are largely part time and semi-skilled.

Also in Objective 2, we are told that new development will have incorporated sustainable building practises and where possible will have contributed to improving the existing building stock. This would appear to imply that Section 106 money will be available to improve existing buildings. Our experience to date is that developers have funded only the infrastructure required solely as a result of their development. Infrastructure in Devizes is stressed almost to breaking point and, if new developments do take place, all of the Section 106 money is likely to be used to shore up the existing infrastructure and we are doubtful if money from this source even covers the cost of improving the basic infrastructure to cope with the additional population, let alone have sufficient to spend improving existing buildings.

In Objective 3, we are told that homes will be built in the most sustainable locations. Sustainability must include avoidance of out-commuting and a reduction in the use of the motor car. In addition, it is inherent in the word that sustainable developments should not cause a reduction in the quality of life for the existing inhabitants, particularly in the standards of public health. Yet it is proposed to build a considerable number of houses in Devizes, which has no railway and poor public transport links. It is extremely unlikely that the number of jobs created in the town could absorb the number of new inhabitants living in these new homes, so the inevitable result will be more out-commuting. Air quality in the town is already above the legal limit and further new developments without additional highway capacity will cause this to deteriorate

further. The threat to public health posed by traffic pollution is well documented and, in the Trust's view must be avoided.

In Objective 3 we read "Benefits from the development of new homes will have been successfully captured for local communities, including the infrastructure necessary to support the new development." This implies that the Section 106 monies will pay for improvements within the community as a whole, as well as funding the infrastructure required as a result of the developments. This repeats the claim made in Objective 2 that Section 106 monies will be used for infrastructure improvement over and above that required as a result of that development.

In Objective 4, we are told that new healthcare facilities will have been provided where appropriate. In Devizes our General Practitioners are under pressure and the planned growth in the population will necessitate additional doctors. It is our view that this plan should earmark land for a new GP Surgery which would not only relieve the pressure but will also reduce the need to travel by siting it in the Green Lane area. We note that healthcare facilities are not listed in the infrastructure plan for Devizes in Topic Paper 12.

In Objective 5, it is proposed to direct development away from our most valuable natural assets. In Devizes the canal must be regarded as an extremely valuable natural asset. It has suffered from being urbanised by recent developments which have resulted in both banks being dominated by housing. The Trust would wish to avoid any further urbanisation such as that threatened by the proposal to build alongside the canal opposite Kingsmanor Wharf. We also had to fight an application to build industrial units in Roundway Village adjacent to the AONB. We would like to see the plan strengthened to aid the Council resist similar applications in future.

Also contained in Objective 5 is the pledge to improve the Green Infrastructure. In recent years Devizes has consistently lost green space to developers, yet there is overwhelming evidence that the existence of green spaces improves health and reduces obesity. We would wish to see green spaces clearly identified within the strategy. We note that there is no mention of green space in the infrastructure plan for Devizes in Topic Paper 12.

Objective 6 includes safeguarding the existing built environment. The Trust is particularly concerned with the Assize Courts building, which is an outstanding historic building, yet its existing condition blights the town and is an eyesore for tourists. The Trust would wish to see the Council place a high priority on finding a way to ensure that the fabric of the building is renovated and its outward appearance remains substantially unchanged. The statement that the sensitive reuse of historic buildings will have taken place where appropriate requires active participation by the Council either as a pump-primer or a catalyst. Without this such statements are meaningless. We note with profound disappointment that there is no mention of the Assize Courts in the infrastructure plan for Devizes in Topic Paper 12.

Objective 7 talks of locating appropriate retail, leisure and employment opportunities in town centres. Whilst we would agree that retail should be concentrated in the town centre, active leisure activities need to be located where there is space and the location of employment depends on the type of business, with many situated on the industrial and business estates.

Objective 8 is critical for Devizes. Whilst it states "A range of viable, efficient sustainable transport alternatives will have been provided to reduce reliance on the private motor vehicle, including effective choices for those people without access to a car and for the distribution of freight", there is no ground for believing that this will happen. Apart from the proposal to enhance the cycling network there are no plans that we can identify to reduce car use and certainly no plans for freight to be delivered by any means but road. Yet this objective is vital to the life of our town, for the health of its citizens and for the future prosperity of its tourist and retail trade. The Trust wishes to see a clearly defined strategy for achieving this objective, including how it is to be funded.

Objective 8 also states "Measures will have been implemented which reduce traffic delays and disruption, and improve journey time reliability on key routes". The Department for Transport is predicting an increase in traffic of 22% between 2011 and the end of the plan period. The sort of measures envisaged for Devizes will fall far short of coping with this, resulting in yet more congestion and the associated damage to public health. In the Trust's view, this statement has no foundation in fact and should be replaced with an achievable objective.

Objective 9 is to provide the appropriate infrastructure at the right time. This is a key change to past practice and the Trust believes this is critical to further development in Devizes. The value of this statement must be judged by the more detailed information given in Topic Paper 12, however. The list of infrastructure requirements for Devizes contained in Table 3.9 of that paper fall far short of what the town requires before any further expansion is undertaken, for example: -

The idea that Traffic Congestion can be addressed by minor junction improvements is not supported by any evidence.

There are no proposals for dealing with poor air quality, yet the Council has a statutory duty to address this issue, even by its own admission by 2012/13.

The biggest issue on cultural heritage, the future of the Assize Courts building, is not even mentioned

The extent to which Devizes will benefit in terms of Green Infrastructure is to screen the new industrial area on the fringe of the town, when what we need to do is safeguard our existing green spaces and provide places for children to play and people to exercise. The Trust deems it important to set limits on the development of the town boundaries so that planning applications such as the one for Coate Road would not succeed,

The Trust understands that the London Road sewers are close to capacity and that is why foul water from the Quakers Walk development had to be piped under pressure over the canal to New Park Road. Yet there is no mention of any further work being necessary.

We are told by the PCT that our GP surgeries require more capacity. We are planning to increase the population by 2,400, yet no mention is made of any new surgery. Is this not more important than a new ambulance station?

In summary, the detail provided in Topic Paper 12 falls far short of statements made in association with Objective 9 such as "Provision of essential infrastructure, including affordable housing, education, health care, emergency services and waste and recycling, will have been achieved" and "Appropriate place-shaping infrastructure, such as leisure and open space, green infrastructure, libraries, public art and cultural facilities, will have been secured".

There are a number of points of general concern.

It seems apparent that the Council is looking to maximise the Section 106 contributions from developers. There is a great danger that such a policy will lead to poor planning decisions with undue weight being given to the size of the contribution over the quality of the design or, indeed whether planning permission should be granted at all. The Trust so an example of this recently in Councillor Carter's argument that the McCarthy Stone development should be allowed on the Wharf as it was the only way funding would be available for improvements to the Wharf. In any town that would be seen as a dangerous policy, in a town with over 500 listed buildings it would be a disaster! The Trust needs reassurance that the integrity of the planning process will remain intact and not be tainted by the contribution element.

The scenario painted by the document for 2026 is of a much improved society where transport delays are a thing of the past, leisure and retail facilities will be far better than they are today and society will be much more inclusive. The Trust finds such a picture incompatible with reality where a nation, deeply in debt, is struggling to even maintain the current standard of living and where public services are under huge cost constraints. We question the value of this whole document, therefore and would rather see one based on what is likely to be achieved in the next 15 years.

Whilst it is generally recognised that society has got to play a larger role in local government, our experience and observation is that the Council do not work with the voluntary sector as much as it could (or should). The Trust is willing to play its part within the limits of its competence.

Conclusions

It should be recognised that the large growth in housing numbers forced on Wiltshire in the past has not solved any problems but has increased the problems because people have been drawn in from other parts of the country. Further expansion in the population without an adequate infrastructure will only make matters worse.

Considering the Devizes Community Area, there is much to be done to make up for the neglect of infrastructure development in past decades if the communities are to be resilient. Infrastructure must be planned in advance and not bolted on belatedly, if at all. In particular, attention must be given to the creation of new parks, other open public spaces and local facilities in the new estates. There should be no more building in the open spaces that remain close to the town, such as the land adjacent to the police headquarters, and there should be no planned housing developments before the town centre air pollution problem has been rectified. Employment opportunities must also be provided before there is any increase in the population of the Area to reduce the amount of out-commuting. The significant tourism potential of the Area a hub for Wiltshire should be recognised and that would bring employment and income. Such measures as these are now needed to return the community to sustainability.