



# **CORE STRATEGY SUBMISSIONS AUGUST 2011**

**East Chippenham**

**Chippenham 2020**

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## 1 INTRODUCTION AND OVERVIEW

- 1.1 These Core Strategy Submissions are made on behalf of Chippenham 2020, which owns approximately 170 acres (70 hectares) of land to the east of Chippenham (East Chippenham).
- 1.2 In 2009, East Chippenham represented the 'preferred option' for a strategic site allocation to accommodate the necessary housing and employment related growth of the town. The emerging Core Strategy, June 2011, has seen the removal of the preferred option status and the promotion of two alternative options, both of which are heavily reliant upon the private motor car as the bulk of the land lies in a peripheral location, entirely remote from Chippenham town centre.
- 1.3 Chippenham 2020 fundamentally challenges the loss of the preferred status and the promotion of both alternative sites. This is based on the promotion of such alternative sites being wholly unexplained and not supported by the evidence base which is fundamentally flawed.
- 1.4 In consequence, the objections to the Core Strategy are wide ranging and go to the heart of the Sustainability Appraisal, a crucial part of the emerging evidence base. Chippenham 2020 considers that a fundamental review of the options and the evidence base which has led to the option selection is absolutely essential. In particular:-
- The housing land availability strategy provides for inadequate housing growth;
  - The numerical modelling and forecast for housing growth are unsound;
  - Land allocated for new and existing employment purposes are unreasonably restrained without good purpose;
  - The geographic distribution of new employment land in out of town locations are inappropriate as they will not attract valuable B1 employment investment;
  - The transport and spatial strategies appear to make arbitrary site choices which are not supported by the emerging evidence base and do not withstand scrutiny;
  - The Sustainability Appraisal supporting the evidence base is wholly unsound. It is based on conjecture and guidance, rather than objective evidence produced by experts from relevant disciplines. As such, it is an inappropriate basis upon which to formulate policy;

- The mass of documents, Topic Papers, appraisals, tables and matrices are utterly perplexing and unfathomable. The amount of cross referencing required is ludicrous. There is absolutely no transparency or clarity;
  - The evidence base intended to support the consultation process is fundamentally flawed and cannot be relied upon.
- 1.5 Perhaps the most alarming outcome of this particular consultation is the promotion of strategic sites for housing and employment growth which are remote from Chippenham town centre. In particular, sites to the south of Chippenham, identified as suitable for new development, would accentuate travel patterns which are dependent on the private motor car and give rise to a significant increase in CO<sub>2</sub> omissions. These sites are advanced at the expense of alternative which are sites closer to the town centre, offering better connectivity and accessibility by a choice of modes of transports including pedestrian and cycle routes.
- 1.6 Therefore, the suggested outcomes of policy are alarming in their site selection preferences and disturbing findings have been formulated from the evidence base. Such findings do not withstand scrutiny, let alone comply with Government policy.
- 1.7 These submissions submitted on behalf of Chippenham 2020, include the following:-
- A comprehensive narrative on the Core Strategy consultation document and supporting technical topic papers, on a subject by subject basis;
  - Individual submissions objecting to the content of the Core Strategy consultation paper; and
  - Legal submissions by Pinsent Masons Solicitors, detailing the nature and severity of the misguided process undertaken by Wiltshire Council and the wholly inappropriate findings.
- 1.8 Chippenham 2020 would, of course, welcome the opportunity to meet with Officers and Members of Wiltshire Council to work in a positive manner as a whole. It would be preferable to a lengthy, contentious and costly process and engagement in conflict.

## 2 HOUSING LAND AVAILABILITY

### 2.1 The Strategic Housing Requirement

2.1.1 Strategic Objective 3 of the Core Strategy states at paragraph 3.6, that provision will be made within Wiltshire for around 37,000 new homes up to 2026. The housing requirement has been calculated using a methodology devised by the Council. Both the methodology and its associated research findings are explained in Topic Paper 17: Housing Requirement Technical Paper (TP17).

2.1.2 TP17 develops four housing requirement forecasts based upon varying assumptions relating to economic growth and self-containment. From the forecasts, TP17 develops a range for the housing requirement, which is then refined to a specific figure.

2.1.3 We strongly object to both the methodology and resulting housing requirement forecast and do not consider the supporting evidence to be sufficiently robust to provide a sound basis on which to develop the Core Strategy.

2.1.4 The following reasoning below outlines our serious concerns with the methodology. Following this, we recommend the changes we believe should be made to the Core Strategy to rectify the current deficiencies to render it sound.

#### **Defining the Housing Requirement Range**

2.1.5 The principal objection to the housing requirement range is that the figures produced do not provide a reasonable and realistic basis upon which to plan for growth within the Core Strategy. Of the four forecasts produced to determine the strategic housing requirement, scenario (d) entitled “*Job Alignment Led*” is used. This scenario “*assumes that the projected employment growth in Wiltshire will be delivered, and that the working population will grow to meet this, but that current out-commuters will change jobs to fulfil one of the newly arising job opportunities in Wiltshire. In effect, it results in a zero net commuting scenario*”.

2.1.6 Whilst it is recognised that the resulting figure is only used to produce one end of a range for the housing requirement, this scenario is so unrealistic that it should not be used at all, even for the purposes of defining the range. The desire for self-containment and the reduction of commuter traffic is acknowledged, but it is wholly unrealistic to assume a zero net commuting scenario. The market driven economy does not work on such a simplistic basis.

- 2.1.7 There is no evidence provided within the Core Strategy or supporting evidence base which indicates that self containment will increase. Indeed, paragraph 3.17 of TP17 explains that people are free to travel where they choose for work and acknowledges that this cannot be controlled through the planning system.
- 2.1.8 Furthermore, the zero net commuting scenario is even less realistic when viewed in the context of the surrounding area. There are major employment centres within easy commuting distance all around Wiltshire including, most notably, Bath, Swindon and Bristol. As the economy grows, so too will the major employment centres and thus it will be challenging for Wiltshire to maintain the existing level of out commuting, never mind achieve a reduction.
- 2.1.9 This assessment is backed up by the evidence on commuting patterns from the Office for National Statistics which demonstrates that 'out commuting' from Wiltshire increased between 2001-2008, with the place of work for Wiltshire residents reducing from 75.5% in 2001 to 71.7% in 2008. Given the increase in out-commuting over recent years, which occurred during a period of sustained economic growth, it is not at all clear why the Council should consider that a scenario which assumes zero net out-commuting could be a sound and robust basis for establishing the range for the strategic housing requirement.
- 2.1.10 The upper end of the housing requirement range is defined by scenario (c) which is based upon an employment led projection. This projection assumes employment growth as forecast by Cambridge Econometrics and Oxford Econometrics and that the current propensity to out-commute will continue. Given that evidence in recent years has found there to be a decrease in self-containment, even a continuation of the current propensity to out commute appears to be optimistic. Nevertheless, in the absence of evidence which supports either a lower or higher level of self containment, there are logical grounds for assuming a continuation of the current trend.
- 2.1.11 For the reasons set out above, we strongly object to the housing range as defined by scenarios (c) and (d) in TP17. The only conclusion which can be drawn from the evidence available is that the lower end of the range is invalid and the top range in the employment led assessment is the correct basis upon which to establish the strategic housing requirement.

2.1.12 Paragraph 5.13 of TP17 provides a population led housing requirement in the order of 43,200 to 43,900 dwellings, depending upon whether concealed households are to be added to the requirement. This figure is broadly in line with the latest household projections published by the Department for Communities and Local Government (DCLG) in November 2010. The DCLG projections take account of the most up to date evidence and assumptions on migration, household formation rates and population statistics. They do not, therefore, provide a sound and robust benchmark upon which to develop the strategic housing requirement. For this reason, we support the use of the population led projection of 43,900 dwellings (including meeting the needs of concealed households) in the methodology for defining the strategic housing requirement at the lower end of the range.

2.1.13 In light of the analysis above and information contained within TP17, we consider that the strategic housing requirement should fall between the population and employment based projections. The range which should therefore be subsequently refined is 43,900 – 57,800 dwellings.

### **Refining the Range**

2.1.14 After defining the range for the housing requirement, the methodology outlined in TP17 draws upon a number of considerations in refining it to produce a single housing requirement figure. The considerations which have been explicitly taken into account in the Topic Paper include:

- Affordability;
- Deliverability;
- Environmental Impact; and
- New Homes Bonus Scheme.

2.1.15 In addition to the concerns we have raised above regarding the proposed housing requirement range, we also believe there are a number of shortcomings in the assumptions used to refine the range to reach a specific figure.

### **Affordability**

2.1.16 In relation to affordability, TP17 concludes at paragraph 6.16 that *“given that some neighbouring authorities appear to be reducing their housing requirements in relation to the revoked emerging strategy, the demand across the sub-region*

*will be acute. As a result, even if Wiltshire were to deliver 57,800 dwellings, the effect on affordability would be negligible”.*

2.1.17 Whilst we have some sympathy with the Council in respect of affordability, and acknowledge that they are not responsible for the scale of housing delivery in neighbouring authority areas, it is not acceptable to simply follow suit with other local authorities and propose a lower housing requirement because neighbouring authorities are doing the same. Indeed to do so, would further exacerbate affordability concerns across the region and ensure that the residents of Wiltshire are faced with the same affordability concerns as those in the neighbouring authority areas. For this reason, we do not consider that the issue of affordability should impact upon the strategic housing requirement.

2.1.18 Paragraph 6.15 acknowledges the widely held view that supply and demand in the housing market will influence prices. It is also reasonable to assume that house prices in Wiltshire cannot be considered in isolation and that the relationship with the adjacent authority areas in the sub-region should be taken into consideration. However, we do not agree that it is appropriate for the Council to discard the issue of affordability simply because other authorities are seeking to reduce their housing requirement.

2.1.19 Furthermore, reducing housing supply by restricting new build will fuel house price inflation, severely impact upon the ability of existing households to move within communities and limit the ability of newly emerging households to stay within the community within which they grew up. Therefore, notwithstanding the impact on affordability, reducing the supply of housing will limit flexibility in local housing markets.

### **Deliverability**

2.1.20 In respect of the perceived constraints over delivery, TP17 paragraph 6.21 proposes to constrain the dwelling requirement to a maximum of 43,200. This is based solely upon the perception that the scale of housing growth will be limited in the future to that which was achieved in the past. This is a wholly inappropriate and unsound means of planning for the future growth of the authority area. It does not reflect need.



- 2.1.21 It is widely acknowledged that, even during the economic boom years of 2001-2008, there was insufficient housing delivered to meet the growing needs of the country. Both the previous administration and the current coalition government have made clear commitments to increase the delivery of housing across the country. This sentiment is expressed in “Planning for Growth” (March 2011) which strongly supports new development including housing. To constrain the upper end of the strategic housing requirement to the level achieved during a time when housing delivery did not match housing need, is both counter-intuitive and unsound.
- 2.1.22 Many developers have argued in the past, particularly during periods of strong economic conditions, that the major constraint to housing delivery was the planning system. Indeed, during the housing boom, research by the Home Builders Federation consistently identified the planning system to be the greatest constraint to housing delivery. Assuming this to be correct, then the reason for low delivery rates achieved in the past, is not simply sales rates reflecting a poor appetite for the development industry to deliver new housing but a wholly constrained industry hemmed in by restrictive policy. Past delivery rates are not therefore a true reflection of the market or need and do not provide a logical or sound basis upon which to limit future housing delivery.
- 2.1.23 The Core Strategy is intended to set the planning framework and establish the strategy for growth for a 15 year period. Whilst the recession has reduced housing delivery in recent years, there may be other means of increasing delivery during the plan period of which we are not currently aware. For example, there is much debate at the current time regarding the role of the private rented sector in meeting future housing needs. Should the funding market respond, growth in the private rented sector may make a substantial contribution to an increased level of housing delivery in the future.
- 2.1.24 Notwithstanding the above, as a point of principle, the Core Strategy should seek to put in place plans and proposals for the delivery of the development needed during the Core Strategy period. If, despite the best endeavours of the Council to support the development of the necessary housing, employment and infrastructure, the private sector does not deliver, then this is not a fault of the Local Authority. However, if the Local Authority were to fail to meet the needs of the market due to misguided perception, at a particular point in time, then the

market will be unable to deliver and the planning system will fail. For this reason, we strongly urge the Council not to apply an arbitrary and unjustified limit to the scale of development which is predicated upon a misguided market perception and instead to proactively plan to meet the growth of the community.

## **2.2 Environmental Impact**

2.2.1 Paragraph 6.25 of TP17 makes reference to the Sustainability Appraisal (SA) produced alongside the Core Strategy. The SA produced does not however provide a robust and balanced assessment of the social, economic and environmental impacts of the proposed strategic housing requirement. All that is concluded in relation to the housing requirement is that *“it is likely that in order to best achieve a balance between protecting and enhancing the environment and pursuing housing growth that will lead to significant social and economic benefits, a mid-range housing scenario should be pursued, provided there are strong links to Core Strategy policies that will ensure housing growth is sustainable”*.

2.2.1 It is not clear in the SA how this conclusion has been derived or what, if any, weighting has been applied to the various sustainability considerations. Indeed there appears to be no actual assessment of the social economic and environmental effects of the housing requirement range. This is wholly unsound. The evidence base has been disregarded for no good reason.

2.2.2 In order to properly and robustly test the housing requirement options, the SA should explicitly and quantitatively analyse the implications of housing delivery. This would provide a sufficiently robust assessment to determine the correct housing requirement. In this regard, the SA supporting the Core Strategy is flawed and not a sound basis upon which to establish a robust policy position within the Core Strategy.

2.2.3 Notwithstanding the short-comings of the SA, we do not consider that there are any over-riding environmental constraints which should prevent the delivery of the necessary scale of housing in Wiltshire. The Core Strategy covers a considerable area and, whilst there are some areas of environmental constraint, there is more than sufficient land which is not protected and is of no inherent environmental or ecological value. We do not therefore consider that the environmental impact of development should limit the scale of growth proposed.

## **2.3 New Homes Bonus Scheme**

2.3.1 It would appear from TP17, paragraph 6.26 - 6.29, that the objective in relation to the New Homes Bonus Scheme is to ensure that no net loss of funding will occur. Whilst a 'no net loss' position would help maintain the status quo of service delivery by Wiltshire Council, there is no acknowledgement in TP17 that an increase in housing delivery would result in a major positive benefit through increased funding for local services and facilities.

2.3.2 There is an extremely valuable opportunity available for Wiltshire Council to secure additional revenue funding through the delivery of sustainable development which can be used to deliver local priorities. This may not be available in the long term and we would therefore urge the Council to maximise the current opportunities.

## **2.4 Draft National Planning Policy Framework**

2.4.1 The Draft National Planning Policy Framework (NPPF), July 2011, also needs to be taken into account. Housing objective 109 (Planning for People) seeks to significantly increase the supply of housing. The Local Planning Authority should:-

- Deploy an evidence base to ensure core plan policies fully meet the requirements of market and affordable housing delivery;
- Identify and maintain a rolling supply of 5 years plus 20% (6 years);
- Identify specific developable sites for growth;
- Make allowance for windfall sites.

2.4.2 The Housing Land Availability targets forming part of the Core Strategy does not meet these Government targets. The evidence base is highly suspect and unsound.

2.4.3 The evidence base does not demonstrate:-

- A phasing strategy for release of a rolling 5 year plus 20% supply.

- How the housing supply can be significantly increased in line with draft national policy.

2.4.4 As stated above, it extrapolates from data obtained during a time of extremely limited supply and very low levels of house completions within the marketplace. This is inappropriate and unacceptable.

## **2.5 Conclusions on the Strategic Housing Requirement (2006-2026)**

2.5.1 The strategic housing requirement identified by the Council is for the delivery of between 35,900 to 43,200 dwellings. For the many reasons we have identified above, we do not consider the methodology adopted or the resultant housing requirement range provides a sound and robust basis for the Wiltshire Core Strategy. The significant shortcomings in the assessment process and the unjustified assumptions, regarding key components of the methodology have had a fundamental impact upon the strategic housing requirement proposed.

2.5.2 Prior to the publication of the submission version Core Strategy, we would strongly recommend that the Council revisit the methodology used in determining the strategic housing requirement range and we would welcome the opportunity to work with others in this regard. There is an opportunity to address the current flaws in the methodology and it would assist all those concerned in the delivery of sustainable development within Wiltshire to ensure that the current shortcomings are addressed prior to Examination.

2.5.3 In the interim, we consider that the Council has no other option but to revert to the housing requirement contained within the proposed changed version of the emerging South West Regional Spatial Strategy (RSS). Whilst not adopted, the RSS has been prepared in light of up to date evidence on population projections and the requirement has been tested by an independent panel. Furthermore, recent appeal decisions have supported the use of the housing requirement contained within the emerging RSS as being a reasonable and robust basis upon which to plan.

2.5.4 Accordingly, until a sound and robust local requirement has been derived, the Council should therefore use the RSS housing requirement for Wiltshire of 44,400 dwellings for the period 2006 – 2026 (32,000 dwellings excluding South Wiltshire). This is towards the bottom end of the range that is justified at the local

level, based upon population and economic forecasts. It has been independently tested and provides a sound starting point until the local evidence can be further refined.

- 2.5.5 The entire housing supply rationale needs thorough reconsideration. Very significant weight ought to be applied to the draft NPPF, in particular to Policy 109. Wiltshire Council should demonstrate a significant increase in the supply of housing to comply with this national objective.

### **3 SPATIAL STRATEGY**

- 3.1.1 The Spatial Vision for Wiltshire on page 17 of the Draft Core Strategy states that by 2026, sustainable development will be focused on Chippenham (together with Trowbridge and Salisbury). The aim is to achieve a reduction in the need to travel, provide improved accessibility to local services with a more sustainable approach towards transport and provide housing in sustainable locations. The land East of Chippenham is the best greenfield site to meet these needs and provide the most sustainable option for the future growth of the area.
- 3.1.2 At the outset it is very apparent that the consultation document is sadly lacking. There is no clear map allocating sites in different geographical locations for different uses. The lack of clarity is alarming.
- 3.1.3 The two consultation options put forward for Chippenham will, to a certain extent, address some of the 10 Strategic Objections in the Core Strategy. Critically however, the East of Chippenham site will fully address each of the 10 Strategic Objectives whilst having the extra benefit of providing a greater enhancement to the vitality and viability of Chippenham town centre, thereby promoting a more sustainable form of transport and development.
- 3.1.4 Options 1 and 2 in the Core Strategy are far more isolated from the town centre and railway station than the East of Chippenham site. Whilst both options encompass several sites, the majority of the allocation for new development entails land to the south of Chippenham. Therefore Options 1 and 2 are more car reliant and substantially increase the likelihood that people will drive to Bath or Trowbridge etc to shop and work. This would promote out commuting and undermine the vitality and viability of Chippenham Town centre, resulting in wholly unsustainable form of development from a transport perspective.
- 3.1.5 Hunters Moon, for example, is plagued by poor access, a remote location and suffers from a complete lack of permeability/accessibility with the town centre. Such matters are not fully discussed and the assumption that it would suit housing use is far from justified.
- 3.1.6 Again, whilst the 2 options go some way to addressing a number of the 20 Chippenham Objectives, the East of Chippenham site is best placed to achieve all of the Objectives. This is through;

- It's closer relationship with the town centre and railway station;
- It's better location and ability to integrate with the River Avon and Town Centre;
- It's ability to provide employment opportunities close to the station;
- It's ability to provide good access for businesses to the M4 and railway station;
- The realistic prospect to help to enhance the town centre; and
- The ability to provide a development that can deliver a real alternative to the car in terms of promoting pedestrian and cycle access to the town centre and railway station.
- It will support and maintain the existing education infrastructure through proximity and utilise it efficiently. This is true at both Abbeyfield School and Wiltshire College. This is a far preferable approach than one which places a burden in locations remote from the town with poor access to education facilities.

3.1.7 Therefore, in terms of assessing the two options against the original Preferred Option in the Wiltshire 2026 Core Strategy, the East of Chippenham site clearly has the greater scope to achieve both the Strategic Objectives of the emerging Core Strategy and its stated Objectives for Chippenham.

3.1.8 Given this, and given the Interim Sustainability Appraisal Report acknowledges that the sites put forward to the East and South of Chippenham score very similarly, surely the East of Chippenham site should be the chosen site; it has the potential to better provide for a greater delivery of the Strategic Objectives and objectives for Chippenham, both of which lie at the heart of the Core Strategy.

3.1.9 The Spatial Vision for Wiltshire on page 17 of the Draft Core Strategy states that by 2026, sustainable development will be focused on Chippenham (as will Trowbridge and Salisbury) to achieve a reduction in the need to travel and improve accessibility to local services with a more sustainable approach towards transport. This relies on the provision of housing in sustainable locations. The land to the East of Chippenham is the best greenfield site to meet these needs and provides the most sustainable option for the future growth of the area.

## 4 SUSTAINABILITY APPRAISAL

### 4.1 Assessment Criteria

4.1.1 The Interim Sustainability Appraisal Report (SA), June 2011, is accompanied by lengthy technical appendices. Both documents are considered by the consultation process and are referred to as the 'evidence base'.

4.1.2 Appendix C to the SA '*Significant Effects Assessment Criteria*' is predicated by a very significant qualifier. It states:-

*"These criteria are guidelines only to help improve the objectivity of effects assessment."*

4.1.3 It is therefore abundantly clear that matters within the SA which rely upon the evidence base are in fact relying upon, and being assessed by, guidelines only. This is far more than a matter of semantics. It is fundamental to the whole approach taken by Wiltshire Council.

4.1.4 It would be reasonable to expect an evidence base to comprise a series of expert professional reports across a range of disciplines. Such reports should entail research, collection of data from the field and objective interpretation/assessment of that data.

4.1.5 The Collins English Dictionary defines the key terms thus:-

- Evidence: *"data on which to base proof or establish truth or falsehood"*.
- Guideline: *"a principle put forward to set standards"*.

4.1.6 Using the above English language, it is clear that the SA, within its technical appendices, simply puts forward a set of principles not evidence. Such principles may indeed help to set appropriate policy standards but they are not, by any means, empirical data upon which to base proof. It is, therefore, not an evidence base, it is simply a set of guidelines.

4.1.7 It is therefore apparent that the options set out for spatial strategy for Chippenham are based on a set of preferred guidelines, rather than an objective evidence base. Such an evidence base should have involved, inter alia, a Traffic Impact Appraisal, a Landscape and Visual Appraisal, an Ecological Assessment



and a raft of other expert professional discipline assessments. No such assessments are present.

- 4.1.8 Furthermore, when assessing sites and forming significant impact conclusions, the SA and its technical appendices do not differentiate or assign weightings to different topics of assessment. For example, there is no differentiation between the relative importance of housing, health, community, flood risk or biodiversity. There is an underlying implicit assumption that all relevant disciplines are weighted equally, but this is not stated with any degree of transparency. Even if such equal weightings were applied, it would not necessarily inform the stated objectives of the Wiltshire Core Strategy and form a suitable base for assessment.
- 4.1.9 In this respect, once again, the SA and its technical appendices, forming the evidence base, are wholly unsound.
- 4.1.10 It is also apparent that no consideration or weighting has been given to views arising from localism processes. However, within the housing land availability figures, for example, it is clear that local views have played a significant part in framing the strategy. In consequence, the evidence base bears a very poor relationship to the strategic options and spatial strategy provided for consultation on the emerging Core Strategy. This is wholly unsound.
- 4.1.11 Finally, it also sets out a range of potential impact results ranging from *significant negative effect* to *significant positive effect*. The results are categorised using the symbols --, -,?,0,+ and ++.
- 4.1.12 There is no apparent scoring system, no transparency, and the six ranges defined are far too narrow. All too frequently, competing sites and options are scored equally, achieving exactly the same results, yet without explanation one site is selected as the preferred option. This is far from thorough methodology and is wholly inappropriate.
- 4.1.13 Obviously any appraisal output is only as good as the assumptions and input upon which it is based. It is also as good as the preparation of the data which should be made on an entirely consistent basis across all disciplines. The principle problem is that the scoring or rating system which comprises six categories is extremely crude and far from objective, being based upon policy interpretation rather than evidence from relevant expert disciplines. The failure to

identify strengths and weaknesses of alternative sites is very apparent with numerous identical results which are then prioritised without explanation. This is not a basis upon which to proceed to full preparation of a draft Core Strategy. It is unsound.

4.1.14 In terms of the evidence base provided, the SA document is flawed and does not provide a true assessment of the impact from development of each site or combination of sites.

4.1.15 In terms of the options considered under section 5.7.2, the outcome of this assessment is illogical and too narrow. The tables on page 52 of the SA indicate that that it would be no more sustainable leaving the market to determine the level and location of housing and employment and to provide the required infrastructure. This is nonsense and if true would undermine the need for the Core Strategy and planning system.

4.1.16 Surely the benefit of the plan led system and planning policy approach is to ensure that the chosen site or sites for development are the most sustainable option(s). Securing sustainable development is at the core of planning purpose, as confirmed in PPS1 and by the recently published draft NPPF.

4.1.17 If the market was left to determine the location of housing and employment, it would not necessarily choose the most sustainable site but the site that was easiest/cheapest to develop. It would not necessarily be a site that satisfied as many of the Strategic Objectives or Objectives for Chippenham.

4.1.18 In terms of the 9 option sites considered in the report (1a and 1b being considered as 2 sites), it is obvious that:

- Site 1b must be included due to its location and connectivity with the town centre. The impact upon Bird's Marsh can be properly mitigated and the benefits of early delivery are considerable;
- Site 3 must be discounted as it is too small to provide the required housing and employment land;
- Site 4 must be discounted as it has significant adverse effects in relation to land and soil, would increase dependence upon the car and would not aid the vitality or viability of the town centre;

- Site 5 would not aid the regeneration of the town centre as it is isolated and would result in a significant reliance upon the car due to its isolation from the town centre, traffic congestion on the A350 and location away from the railway station. For these reasons this site is not as sustainable as Site 2 to the East of Chippenham;
- Site 6 must be discounted as it is not large enough;
- Site 7 must be discounted for housing as it is isolated from the town centre and railway station and has some sensitive designations in close proximity;
- Site 8 can provide useful brownfield redevelopment opportunities but this will not provide the required number of houses or employment floorspace.

4.1.19 Given the above, and given that the land to the East of Chippenham is obviously better located close to the town centre and railway station, the conclusion given in paragraph 5.7.66 that the larger urban extensions in the south and east “are very similar in their assessment scores, and further detailed information would be required to be able to differentiate further” is most puzzling.

4.1.20 Even if the SA is correct and it cannot separate the South and East Chippenham sites, surely this conclusion should have led to a re-appraisal of all the strategic options for Chippenham, including the East of Chippenham Site?

4.1.21 Such an approach would then have resulted in the three options being properly assessed to ensure that the chosen/preferred option is the most sustainable. Even if this third option resulted in no greater significant impacts, given that the land East of Chippenham is sequentially preferable and has the better potential to aid the town centre, it should be chosen over Options 1 and 2.

4.1.22 The reasoning for this conclusion is clear; it is closer to the town centre to encourage greater pedestrian and cycle use; it is closer to the railway station, it would better meet the Strategic Objectives in the Core Strategy and the stated Objectives for Chippenham and it would score better in terms of sustainability.

4.1.23 The two chosen options now identified are not therefore the most sustainable options and they fail to ensure that the best site is chosen in terms of achieving the Strategic Objectives and stated Objectives for Chippenham. If they do have a purpose in any strategic employment land allocation, it is only to accommodate

very large warehousing and distribution 'sheds' which only offer a very low density of jobs per Ha.

4.1.24 The document also fails to justify why Option 1 is the preferred option for Chippenham when the conclusion at paragraphs 5.7.85 to 5.7.88 state that Options 1 and 2 both score similarly. It also concedes that the Sustainability Appraisal needs updating when further information is available, which is very telling indeed. If the SA is in fact an interim document, then its conclusions can only be considered to be interim.

4.1.25 In terms of ensuring that the most sustainable development option is chosen for Chippenham, given that the Sustainability Appraisal Report October 2009 assessed 4 options for Chippenham and concluded that the option of a mixed use extension to the north of Chippenham and mixed-use extension to the east was the most sustainable option, surely this option should have been continued through to the 2011 Core Strategy?

4.1.26 It appears that the evidence base produced up until 2009 that supports the land East of Chippenham as the best option and most sustainable option, has now been 'put to one side' on the basis of a few objections. Whilst objections must be taken into account and not undervalued, the simple fact is that the land East of Chippenham provides the most sustainable option for future development as well as being the best site in terms of achieving the Strategic Objectives in the Core Strategy and objectives for Chippenham.

4.1.27 It must be remembered that the Strategic Sites Assessment in 2009 concluded the following, on page 23, in relation to the preferred option including land to the East of Chippenham, and there is no evidence to justify a change to this statement:

*"The preferred option is an opportunity to develop a coherent urban extension to the north and east of Chippenham that would balance housing and employment, and a strategic town centre site that would regenerate the town centre of Chippenham.*

*(i) An urban extension north east and east of Chippenham*

*This urban extension will provide a mix of housing and employment and will therefore provide good accessibility to employment provision and the*

*opportunity for people to live and work in the same location, potentially increasing the self-containment of Chippenham.*

*The urban extension is in close proximity to the town centre providing good access to services and facilities.*

*The north east parcel of the urban extension is adjacent to a residential area and to the Greenways Business Park. Additional potential employment land is located near to the A350, enabling easy access to the M4. Birds Marsh Wood is nearby, which is ecologically sensitive but careful design and masterplanning would minimize impact on this site.*

*The eastern parcel of the urban extension contains land within flood zones 2 and 3 and grade 1 agricultural land. However, the area is large enough to accommodate development on land outside of these areas. There is opportunity to utilize the area within the floodplain for green infrastructure and this would be linked with improvements to the riverside within the Town Centre Strategic Site.*

*An electricity powerline runs through the site but masterplanning can ensure that this is avoided.*

*Access to the urban extension is reliant upon a new eastern distributor road, including a new railway bridge. This would ensure that the urban extension is effectively connected into the existing road network.*

*The proximity of the urban extension to the town centre and the railway station allow for alternative methods of transport other than the car to be used. Bus connectivity around Chippenham in general is poor. However, the urban extension is near to existing bus service routes and gives the opportunity for the routes to be extended to include the new development.*

*The urban extension is near to existing emergency services (for example, Fire and Rescue, GP and Ambulance Services). Further work is required to establish whether a new combined site can be provided as part of any development.”*

Page 25 also states:

*“This option is preferred because it provides one main coherent urban extension to the east and north of Chippenham that would provide a mix of housing and employment, within close proximity of the town centre and the*

*railway station. It could also enable the development of an eastern distributor road.”*

4.1.28 As neither of the two options being put forward in 2011 achieve the benefits stated whilst being in close proximity to the town centre and railway station, the choice of the two options is fundamentally flawed and will not result in the most sustainable option for Chippenham.

4.1.29 It would be unrealistic to suggest that development to the East of Chippenham could take place without impacting on the environment. The moot points are that the impact will be less than other locations, the impacts can be properly mitigated and it will deliver town centre benefits.

## 5 SITE SELECTION

- 5.1.1 The two options chosen for Chippenham have been selected on the basis of the evidence within Draft Topic Paper 14: Site Selection process Consultation June 2011 (TP14). The contents and findings of this document are flawed.
- 5.1.2 Page 1 of the document should reflect that paragraph 3 of PPS12 which state that “*Sustainable development is the core principle underpinning planning*” and this is further confirmed by the recently published draft NPPF. Sustainable development should therefore guide all development and the Core Strategy should be selecting the most sustainable, deliverable and developable sites that can meet the future needs of Wiltshire.
- 5.1.3 The document clarifies at paragraph 5.9 that the sites in Chippenham were reassessed following the community response to Wiltshire 2026. The table on page 12 further clarifies that the sites were reassessed following concerns from the community over the number of houses being provided.
- 5.1.4 The report provides no evidence or justification to back up the discounting of the previous option for development on land to the East of Chippenham. What evidence is there to suggest that the other two options are more sustainable than the original 2009 option? The sustainability appraisals do not reach this conclusion, so where is the evidence?
- 5.1.5 The land East of Chippenham is well located to provide some of the employment floorspace needed, being located closer to the town centre, closer to the railway station, closer to the M4 and within easy access of the A350.
- 5.1.6 The reduced number of houses to be provided does not undermine the sustainability of the site bearing in mind its location within walking and cycling distance of the town centre and railway station – something that current options 1 and 2 cannot provide, meaning as a result they will promote more reliance upon the use of the car and outmigration of jobs and retail trips.
- 5.1.7 Appendix 1 to the document tries to justify the two options. However, this relies upon evidence within the Wiltshire LDF Strategic Transport Assessment and the findings of this report are questionable, too simple and weak (see Section 8).
- 5.1.8 The findings from infrastructure consultation on pages 34 and 35 identify no major impediments to development to the East of Chippenham. An issue is raised

regarding sewerage connections being expensive, but the southern site identified in Options 1 and 2 will have similar issues plus the costs of gaining water connection from the north.

- 5.1.9 The responses to Wiltshire 2026, Chippenham Visioning Event, Chippenham Vision Statement and the second workshop raise no concerns regarding the development of land to the East of Chippenham and its development could address the majority, if not all, of the aspirations identified.
- 5.1.10 The second workshop identified the Showell Farm site as the most suitable for employment given its location adjoining the A350, but this site is not within walking distance of the town centre or railway station and would therefore encourage the use of the car. In addition it is not well linked to the remainder of the town nor the M4.
- 5.1.11 Furthermore, there appears to be a desire for 4,000 dwellings based upon a local perception of what Chippenham can sustain, rather than being based upon housing market needs and projections.
- 5.1.12 The conclusion on page 41 is not backed up by evidence. The conclusion states that *“the previous option proposing development North and East of Chippenham has been discounted”* but this is not backed up with any evidence in the Sustainability Appraisals. The only reasoning given is that other solutions are better, given the emphasis on the short term delivery of employment land and the reduction in the number of homes to be proposed over the plan period.
- 5.1.13 However, the table on page 40 shows Option 2 (land East of Chippenham) and Option 5 (land South of Chippenham) scoring the same in terms of sustainability. Although the scoring behind this table is questioned (on the basis that the land to the East of Chippenham must be more sustainable than land to the south given that it is within walking and cycling distance of the town centre and railway station) even if the table is correct, the south and east options have equal results. As such there was no justification for dropping it as an option.
- 5.1.14 Where is the evidence and justification showing that a smaller development on land to the North and East of Chippenham is not the most sustainable option? Why has this option not be retained as a third choice in the consultation?



5.1.15 Stage 5 on page 42 provides a table comparing the original Wiltshire 2026 preferred option with the two new options but where is the justification behind the scores and evidence findings? Why will new options 1 and 2 have less impact upon biodiversity than the East of Chippenham site? Why will options 1 and 2 result in less flood risk and pollution? Why are options 1 and 2 better in terms of poverty/deprivation, community facilities and education and skills? Quite simply there is no evidence or plausible explanation.

5.1.16 It is noted that options 1 and 2 are far worse than the East of Chippenham site in terms of their impact upon land and soil, water resource, historic impact and landscape yet such considerations are cast aside and effectively dismissed.

5.1.17 Page 49 of the report identifies the main opportunities for the East as follows:

- Provision of a new distributor road and railway crossing that will improve transport connectivity to the railway station and town centre;
- The opportunity to maintain and enhance the wildlife corridor and pedestrian routes;
- Offering improvements to the riverside park area and town centre environment;
- The provision of a country park along the river;
- It will address surface water management issue in the Hardens Farm area;
- Close relationship with the town centre and Langley Park regeneration sites.

5.1.18 Perceived drawbacks to the East Chippenham option are listed on page 51. However, these can be easily addressed through the following mitigation measures and do not comprise major obstacles to delivery or outweigh the opportunities:

- Open views of the site can be addressed through sensitive design and masterplanning;
- The DTZ Report recommends only 6ha of employment land – although the report also states that new employment land is better located in North Chippenham. There is an acknowledged shortage of employment land

supply within the town and early new employment land can be delivered with a Spatial Allocation which identifies land in both the North and the East;

- The proposals include a buffer to the River to prevent flooding and also provide for a new country park.

5.1.19 Pages 55-59 detail the opportunities and challenges for Chippenham South, but whilst there is one perceived benefit in terms of bringing forward employment land more quickly (this is not really a constraint on the land East of Chippenham if phased correctly), it has similar constraints in terms of:-

- impact upon agricultural land;
- visual constraints; and
- the need for road building.

5.1.20 The south also has additional constraints in terms of

- the Conservation Area designation;
- Heritage Assets;
- lack of bus service capacity;
- impact upon the capacity of the A350;
- designation as a Groundwater Protection Zone; and
- sewerage treatment restrictions.

5.1.21 The benefits of this site do not therefore outweigh the constraints. Comparing the two sites can only lead to the conclusion that the land East of Chippenham provides better opportunities and is more sustainable. At the very least the evidence base should rationally examine all of the identified constraint.

5.1.22 The comments in the table therefore undermine the two options being consulted upon and fundamentally undermine the findings of the Sustainability Appraisal . The table on page 42 of Topic Paper 14 assess the land East of Chippenham as having a greater impact upon biodiversity than Options 1 and 2; being more at risk of flooding than options 1 and 2 and scoring worse in terms of poverty/deprivation, community facilities and education and skills than Options 1 and 2. Where is the evidence for this? This is supposition not evidence.

## 6 ECONOMY AND EMPLOYMENT LAND

- 6.1.1 Topic Paper 8 – Economy Core Strategy Consultation – June 2011 (TP8) concerns planning for economic growth and prosperity, particularly in the Vision Towns.
- 6.1.2 TP8 builds upon the October 2009 consultation document *Wiltshire 2026 – Planning for Wiltshire’s future*. This document concluded that providing for economic growth was a principal objective of the plan. The enhancement of the vitality and viability of town centres was a closely linked secondary objective.
- 6.1.3 Economic growth is clearly and correctly associated with economic success.
- 6.1.4 TP8 also recognises that providing employment land across the range of business size requirements was desirable, whilst recognising the particular employment needs of different locations. The overall aim is to provide an adequate supply of employment land coupled with a suitable phased release of such land. This was supplemented by an emphasis on the regeneration of the existing employment sites.
- 6.1.5 Strategic objective 1 concerning the retention of existing employment land has, however, been slightly amended to allow for existing sites to be released for other uses “*where appropriate*”. Clearly a fine balance has to be struck between retaining land for future employment needs and recognising that market demands may have altered over time, rendering take up of the allocated land unlikely.
- 6.1.6 TP8 rightly recognises the plan led approach advocated by national planning policy including PPS4.

### ***Job Growth Forecast***

- 6.1.7 Much statistical evidence has been compiled and conclusions drawn within TP8. It is evident that Wiltshire’s job growth would have been strong and would have provided for growth in regional employment over the last 10 years had it not been for a decline in public sector workers.
- 6.1.8 TP8 attempts to understand the economic value and potential of the existing employment sites. It aims to identify when new employment sites will be required using local knowledge and market sources.

- 6.1.9 Accordingly the Wiltshire Strategic Economic Partnership commissioned DTZ to undertake the Wiltshire Workspace Employment Land Strategy (WWELS). The purpose was to quantify the level and type of employment land required and identify a number of sites and premises across the County to ensure continued strong economic growth over the plan period to 2026.
- 6.1.10 WWELS has provided an assessment of future job demand across key sectors including the identified needs of inward investment. In doing so it has relied upon job projections in the draft RSS. About 95 Ha of new employment land is required with a total allocation of 188 Ha.
- 6.1.11 The overall scale of employment development identified for Chippenham was between 30.5 and 39 hectares.
- 6.1.12 In addition an alternative job forecast was undertaken by a Cambridge Econometrics Group who were requested to draw up a projected job growth profile (LEFM) to assist directing job growth in appropriate locations. It was undertaken in September 2010 across a district-wide basis and projected net job growth of 27,570 between 2006 and 2026. This equates to 36 ha of additional employment land being required, which is the equivalent of 1,378 new jobs per annum net, or 766 jobs per Ha (301 jobs per acre)
- 6.1.13 Of these additional 36 hectares, 15.4 Ha was allocated for North, West and East Wiltshire with the balance of 20.6 Ha to be provided in South Wiltshire.
- 6.1.14 The LEFM comparable employment land figure to the WWELS data suggests that a further 76 Ha allowance is necessary for change in the existing stock plus a total 11.2 Ha to allow for choice. This provides an employment land requirement of 123.2 Ha.
- 6.1.15 In summary, the WWELS provides evidence that 188 Ha of employment land should be allocated across Wiltshire. The Cambridge Econometrics (LEFM) model concludes that 123.2 Ha is necessary. In contrast the draft SWRSS demonstrated 116 Ha was supportable to provide 33,100 jobs.
- 6.1.16 Paragraph 8.2 of TP8 ultimately identifies a growth strategy of 27,570 jobs with a total of 178 Ha employment which includes 50 Ha in South Wiltshire. The strategy also notes (paragraph 8.8) that to enable the delivery of job growth, new

attractive employment sites should form part of mixed use urban extension, incorporating housing that is well integrated with the town.

6.1.17 Whilst all of the above is commendable, the two strategic allocation options identified for Chippenham are wholly at odds with the stated strategy, namely:-

- Remote from the town, rather than well integrated;
- Car reliant;
- Unattractive to certain market requirements.

6.1.18 A fundamental reconsideration of the Spatial Strategy is therefore necessary. This would reveal the appropriateness of land to the east as the best potential for strategic growth. In addition:-

- Land to the north can deliver vital infrastructure;
- Rawlins Farm is ideally suited for mixed use including current employment needs;
- Land to the west is capable of accommodating large scale warehousing which offers strategic investment, but provide a relatively low density of jobs per Ha.

6.1.19 If further employment land is required earlier than land to the East of Chippenham can deliver, then sites to the north and west of the town can also be brought forward. In particular such an approach can offer;

- Expansion of Kington Park;
- Development of employment land to the west of the A350, opposite Bumper's Farm;
- Hunter's Moon, which is already allocated for employment.

6.1.20 All of the above provide for a sustainable and sensible strategy for site allocation and will adhere closely to the stated plan objectives.

### ***Geographic Distribution of Employment Land***

6.1.21 Most importantly for Chippenham it is recognised that there is a very limited supply of new employment land available though outstanding permissions and

local plan allocations. It is noted that a failure to respond to this lack of supply could result in existing and prospective employers moving elsewhere. If this scenario were to occur it would fundamentally undermine the economic strategy for one of the most important towns in the plan area. Ensuring an adequate supply of employment land, which is capable of attracting inward investment whilst offering opportunities to retain existing employers is therefore vital for Chippenham.

- 6.1.22 The plan goes on to allocate between 30.5 and 39 Ha of new employment land without evidence or allocation provided for new inward investment purposes. We therefore seriously question whether this allocation is sufficient and why there has to be an upper constraint which may deter large scale strategic investment and employment generation in the County.
- 6.1.23 The stated employment land strategy seeks to balance geographical benefits with attractive employment development for Wiltshire. In paragraph 8.7 Chippenham is recognised as a highly accessible location attractive to employment developers. It is one of the largest towns in the County and a strategic employment location. It has been successful in retaining international employers in both manufacturing and service sectors, including PCT services. The location has excellent transport links being close to the M4, and the main Bristol to London railway route.
- 6.1.24 The strategy is therefore to develop the employment role of Chippenham to promote growth and stimulate inward investment. To enable the delivery of job growth, TP8 notes that new attractive employment sites should form part of mixed use urban extensions incorporating housing that is well integrated with the town (paragraph 8.8).
- 6.1.25 Chippenham 2020 fully endorses this general vision and strategy. However, the location of the strategic employment allocations at Options 1 and 2 do not correlate with the stated objectives of the Core Strategy, the over-arching aims of the Plan nor the Wiltshire wide objectives (paragraph 4.31). The consideration of strategic employment sites has been unreasonably constrained by the SA, along with the unfounded presumptions and inappropriate weighting contained within it.

6.1.26 In consequence, only two options are presented for new employment land as part of the consultation process:

- Option 1: Mixed-use strategic site allocations North-East Chippenham (2.5 ha employment and 750 dwellings) and South-West Chippenham (28 Ha employment and 1500 dwellings); or
- Option 2: North-East Chippenham (2.5 ha employment and 750 dwellings) and South-West Chippenham 28 Ha employment, only 18 Ha developable due to heritage constraints and 800 dwellings) and East Chippenham (25 ha employment and 700 dwellings).

6.1.27 No sound reasoning or evidence whatsoever is provided for these allocations as preferred strategic employment sites.

6.1.28 No plan arrangements showing the proposed demises and their inherent site constraints is provided.

6.1.29 No reason is given for the substantial employment allocation to South-West Chippenham at the expense of other parts of Chippenham, most notably the East and North.

6.1.30 No discussion is entered into on the risk to deliverability should significant problems be encountered on the A350.

6.1.31 The stated aim of employment land delivering job growth on attractive employment sites as part of mixed use urban extensions that are well integrated with the town, is completely ignored. No evidential base for these employment land allocation options is provided. As such the employment land strategy for Chippenham is fundamentally unsound.

6.1.32 The sole stated reason for employment land provision focused in South Chippenham is early deliverability. If this is indeed a sound reason then surely a rational assessment greenfield land to the North, East and West should take place? It is abundantly clear that it has not. The assessment process is flawed and unsound.

### ***Evidence of inward investment***

6.1.33 Governetz and SOGE (Sustainable Operations on the Government Estate) have highlighted the potential for significant inward investment in Chippenham. Such matters have been brought directly to the attention of Chippenham Vision Group.

6.1.34 The public sector is the biggest office occupier in the UK with more than 10 million sq. ft. on the civil service estate alone. An ongoing process of decentralisation away from London is evident. The employment land strategy for Wiltshire should recognise such matters if the stated objective of inward investment is to have any credence.

6.1.35 SOGE apply targets to all central Government bodies as a coherent UK approach to meet the European Performance of Buildings Directive. The targets include:

- recycling of 75% of waste;
- to reduce waste generated by 25%;
- to reduce water consumption by 25%; and
- to increase energy efficiency by 30%.

6.1.36 In addition a 'property reform strategy' seeks to transform the Civil Service Estate with:

- modern efficient low energy use buildings;
- efficient use of space and ways of working; and
- import principles of sustainability into working practices.

6.1.37 Government consensus decrees that the Government estate will now be located in 'hubs'. This is a building or campus of public sector bodies and private sector suppliers who can cluster by sharing facilities and services.

6.1.38 It is clear that Chippenham could attract a hub in the region of 500,000 sq. ft. The selection criteria comprise:

- within 90 minutes commuting distance from central London;
- prices 25% lower (minimum) than in central London;
- within a 15 minute walk of main railway station;



- achieving high levels of BREEAM Standards;
- deliver large floor plates – say 15,000 to 20,000 sq. ft;
- stimulate the public and private sector working partnership; and
- is developer enabled.

6.1.39 It is self-evident that the location of 28 Ha at Showell Farm will preclude such investment taking place. It is well beyond the 15 minute walk from the main railway station and is therefore wholly inappropriate.

6.1.40 This fact alone clearly demonstrates that arbitrary allocation of the great majority of strategic employment land options to the South-West is unsound and potentially extremely damaging to the economy of Chippenham. As such it would jeopardise the entire economic strategy for the Core Strategy.

6.1.41 It is therefore recommended that Wiltshire Council undertake a thorough, transparent and objective review of the relative merits of all potential employment sites capable of strategic allocation within Chippenham. This should be tackled acknowledging the content of Topic Paper 12, Appendix 2.

### ***Langley Park***

6.1.42 Whilst it is acknowledged that not all allocated employment land is suitable to meet current market requirements and some flexibility in policy exemption would be beneficial, there is absolutely no evidence or justification for the allocation of Langley Park for housing purposes. There has been no consideration of greatly improved access that could be provided by a northern relief road. The location of the land is most sustainable and is far preferable to a daily southern migration by workers living in North Chippenham. The strategy of major concentration of employment land to the South will give rise to unsustainable travel patterns, contrary to Core Strategy objectives without proper examination.

6.1.43 Similarly, the land to the West of Chippenham is given scant regard and minimal analysis. A qualitative assessment of land capable of accommodating large scale distribution/warehousing use, including Herman Miller, would demonstrate this area's suitability. It is capable of providing for employment and could offer good town centre connectivity utilising existing infrastructure.

### ***Conclusions***

- 6.1.44 The employment land analysis shows no qualitative assessment of employment market needs and the widely varying requirements for B1, B2 and B8 uses. A 'one site fits all' approach is taken and this is fundamentally unsound.
- 6.1.45 Whilst land to the West of Chippenham, and perhaps Hunters Moon, could possibly accommodate large B8 demand, they are wholly unsuited for modern B1 requirements such as the Civil Service Hub. Such B1 requirements are real and they should therefore form a part of Chippenham's employment strategy with the allocation of sites far closer to the town centre. A failure to even acknowledge this part of the employment market is unforgivable.
- 6.1.46 Finally, sustainability credentials must start with a realistic location and spatial strategy which clearly points to land in the North and East. An employment strategy simply promoting 'sheds on the by-pass' is not the visionary way forward for the Chippenham economy that is so urgently required.

## 7. INFRASTRUCTURE AND DELIVERY

7.1.1. The Strategic Objectives for Wiltshire include “Strategic objection 9: to ensure that infrastructure is in place to support our communities.”

7.1.2. Paragraph 2.18 clarifies that adequate services and infrastructure, required to meet Wiltshire’s growing population, must be brought forward in a timely fashion and where possible bring additional benefits to the community such as town centre improvements or cycle and footpath links.

7.1.3. The Key outcomes to Strategic Objective 9 on page 22 include the following:

- Infrastructure delivered at the right time to support new development;
- Critical infrastructure such as transport and utilities to be coordinated in all new developments;
- Full advantage of the co-location of infrastructure and services;

7.1.4. Paragraph 4.29 confirms that an Infrastructure Delivery Plan and Schedule will guide new and improved Infrastructure. Topic Paper 12 – Infrastructure supporting the Core Strategy (TP12) details how the Infrastructure Delivery Plan will be prepared and identifies the following infrastructure requirements for Chippenham:

- Address the net out-flow of commuters;
- Improve and integrate public transport, pedestrian and cycling links between the town centre, railway station and the Wiltshire College campuses;
- Improve traffic movement around Chippenham;
- Shared sites for healthcare purposes;
- Assess need for new secondary school;
- Make land available for a new cemetery;
- Play park provision in the town;
- Integrate the River Avon with the town centre reflecting its multiple roles as a green corridor for wildlife, recreational space and sustainable transport route;
- Appropriate flood mitigation;
- Avoid existing electricity powerlines to the East and South of Chippenham;

7.1.5. Table 3.2 of TP12 identifies the following requirements for the development of the East of Chippenham site:

- Road bridge over the railway to improve transport connectivity around the town; and
- Enhance and protect the River Avon wildlife corridor, manage the area's landscape quality and biodiversity, and promote recreational uses along with enhanced pedestrian and cycle access to the town centre.

7.1.6. The requirement for the road bridge is also a requirement for the site to the North East of Chippenham and will provide improved connectivity around the town. However, the site proposed within the options to the South West of Chippenham will not provide this transport benefit and connectivity to the town centre and will therefore result in a fragmentation of the infrastructure and lack of provision of the infrastructure requirements outlined above.

7.1.7. Given this, it is obvious that the option of proceeding with the sites to the North East and the site to the East of Chippenham would provide the greatest benefits in terms of meeting the Strategic Objectives for Wiltshire, the objectives for Chippenham and providing the integrated infrastructure approach required for Chippenham as detailed in the various documents supporting the Core Strategy.

7.1.8. Proceeding with the options to the North East of Chippenham and East of Chippenham will also provide the best opportunity for the delivery of integrated infrastructure. It will have the benefit of providing the infrastructure that will best improve traffic flows and pedestrian and cycle links to the town centre, railway station and Wiltshire College. This is clearly demonstrated in highways evidence produced by PFA Consultants, Appendix 1. The report concludes that average journey times in Chippenham can be reduced by up to 30% during morning and evening peak periods as a direct consequence of building the North - East link road. The benefits for the town centre and the A350 will be considerable. No such benefit will accrue with options 1 or 2, with the majority of site allocations to the south being afforded primacy.

7.1.9. Proceeding with the option to the South of Chippenham will not aid the improvements needed to the town centre; will not support the viability or vitality of the town centre; will not encourage cycling or walking to the town centre, railway station or Wiltshire College; and would result in unnecessary further

improvements to the A350 to support the additional traffic in that part of Chippenham.

- 7.1.10. The provision of the bridge has been mentioned in Topic Paper 14 as being a possible impediment to development of the land to the East of Chippenham, but the size of the site and its close physical relationship to the land to the North East of Chippenham mean that the bridge can be delivered and provided as part of the allocation. This would also generally aid the traffic congestion around the town, something that development to the South of Chippenham would not achieve.
- 7.1.11. It is noted that Network Rail have not raised any objection to the provision of a bridge so there is no impediment to its provision.
- 7.1.12. In summary, it is clear that the land to the East of Chippenham, in association with the land identified in the options to the North of Chippenham, provides the best option in terms of achieving the infrastructure necessary to take Chippenham forward.
- 7.1.13. The two sites (North and East) are closely located and can not only result in a better integration of infrastructure, but also provide all the identified improvements to Chippenham identified above, which the South of Chippenham site cannot. The North and East address the traffic issues around Chippenham; encourage cycling and walking to the town centre; aid the regeneration of the town centre and, being located close to the railway station and Wiltshire Campus College, promote low carbon models of transport.
- 7.1.14. The two current options will result in dispersed infrastructure and will not therefore deliver the necessary improvements for the town as a whole that could be achieved through a combination of development of the land to the North and East of Chippenham.

## 8 TRANSPORT

- 8.1.1 The Spatial Vision for Wiltshire on page 17 of the Draft Core Strategy states that by 2026, sustainable development will be focused on Chippenham (with Trowbridge and Salisbury) with a reduction in the need to travel; improved accessibility to local services with a more sustainable approach towards transport; and housing will have been provided in sustainable locations.
- 8.1.2 The Strategic Objectives to the Core Strategy include two key transport objectives in terms of ensuring the vitality and viability of town centres and promoting sustainable forms of transport.
- 8.1.3 The Chippenham Objectives include the need for highways extension to avoid environmental damage and to encourage modal choice through the promotion of pedestrian and cycle links to the town centre.
- 8.1.4 These Objectives send clear criteria to guide the Transport Objectives for the Core Strategy and the Transport Objectives for Chippenham in particular i.e. provide sustainable development that can rely on improved cycle and pedestrian links to the town centre of Chippenham to enhance the vitality and viability of the town centre.
- 8.1.5 The land East of Chippenham is the best placed to achieve these Transport Objectives.

### ***Draft Topic Paper 11: Transport (TP11)***

- 8.1.6 Paragraph 1.2 of TP11 clarifies that land use planning is key to reducing the need to travel, reducing the length of journeys and making it easier for people to access services by public transport, walking and cycling.
- 8.1.7 Paragraph 1.3 states that *“Consistent application of these planning policies will help to reduce some of the need for car journeys by reducing the physical separation of key land uses and enabling people to make sustainable transport choices.”*
- 8.1.8 Given the above, surely the core objectives outlined under paragraph 1.2 should include the following:
- Provide new development in the most sustainable locations that encourage the use of public transport, walking and cycling.

- 8.1.9 It is noted that the vision of the Local Transport Plan outlined at paragraph 5.5 (supported by it being a government national priority) has an emphasis on both the need to reduce carbon emissions and ensuring the sustainable location of new development within walking and cycling distance of town centres and railway stations. East Chippenham can significantly help to achieve this.
- 8.1.10 Section 6 of the document details the rise in the demand for travelling, expected increase in car usage (paragraph 6.4), and dependence upon the car (paragraph 6.5) and that 70% of journeys are for shopping, leisure and other purposes (paragraph 6.7).
- 8.1.11 Paragraph 6.9 confirms that in larger settlements, such as Chippenham, there is scope to encourage modal shift.
- 8.1.12 Section 7 details the priorities and transport-related objectives included in the Wiltshire Community Plan 2011 that include the following:
- Use of Local Development Framework to arrive at the best pattern of new development and support delivery of other priorities;
  - Significantly reduce domestic, business and transport CO<sub>2</sub> emissions and provide a safer and more integrated transport system that achieves a major shift to sustainable transport, including walking, cycle, bus and rail use in Chippenham.
- 8.1.13 Section 8 of the document goes on to detail seven transport policies to be included in the Core Strategy, these policies include the following:
- T1 – Sustainable Transport stating that the council will use its planning powers to reduce the need to travel; plan developments in accessible locations; and provide alternatives to the use of the car;
  - T2 Transport and Development stating that new development should be located and designed to reduce the need to travel and encourage sustainable transport alternatives;
  - T4 Transport Strategies for Chippenham that will include transport measures to facilitate a major shift to sustainable transport by helping to reduce reliance on the car;

- 8.1.14 The contents of Draft Topic Paper 11: Transport therefore provides strong guidance for the location of future development. At its core is the need to reduce the reliance upon the use of the car by locating development in sustainable locations close to public transport including, railway stations, and locating developments so that they encourage cycling and walking to services.
- 8.1.15 In terms of Chippenham, the document strongly advocates the need to reduce CO<sub>2</sub> emissions and to encourage the use of cycling, walking and public transport.
- 8.1.16 However, having correctly identified and indeed assigned priority to reducing CO<sub>2</sub> emissions through a sustainably settlement strategy, the Core Strategy unfortunately then focuses solely on two wholly unsustainable strategic options for growth. The reasoning for doing so is unclear and arbitrary. It is not backed up by an evidence base nor rational assessment. Even the simplest sequential examination of travel time isochrones and connectivity to Chippenham town centre would reveal the unsound nature of the two option site selections. Appendix 2 makes this point with outstanding simplicity.
- 8.1.17 In terms of the two options for development put forward in the Core Strategy, neither option is the most sustainable for Chippenham or best placed to reduce the reliance upon the car.
- 8.1.18 The East of Chippenham site is however located much closer to the town centre and railway station and, therefore, provides the best opportunity to reduce reliance upon the use of the private motor car by encouraging cycling and walking to the railway station and town centre.
- 8.1.19 This is contrary to the contents/findings of the Transport Topic Paper. The two Options put forward do not provide the best available strategy in terms of reducing the reliance upon the use of the car, as identified as being key within TP11 and numerous other Topic Papers, supporting documents and government guidance.
- 8.1.20 Accordingly, the site to the East of Chippenham should therefore be reinstated as the Preferred Option for Chippenham on the basis that it is best placed to provide sustainable development in accordance with the Strategic Objectives and findings within the Transport Topic Paper.



### ***Strategic Transport Assessment 2009***

- 8.1.21 The Strategic Transport Assessment 2009 was produced to provide a strategic transport assessment of Wiltshire's settlements and potential options and to inform the LDF.
- 8.1.22 The report concludes that the land East of Chippenham scored joint 3<sup>rd</sup> out of the 13 sites considered. The methodology and results of the report are questioned because although the land East of Chippenham is the closest to the town centre and closest to the railway station, and has the most potential to encourage cycling and walking, it curiously scores less than sites much further away from the town centre. Clearly and logically it would not be practical to walk or cycle to the centre from the majority of land identified in Options 1 and 2 lying in the South. They are reliant on the congested A350 or possible unsustainable dualing of the A350. The weighting of assessment criteria is, therefore, inappropriate and a wholly unsound basis upon which to base a spatial and transport policy with the stated aims of reducing CO<sub>2</sub> emissions.
- 8.1.23 Therefore in terms of scoring, the East of Chippenham site should score considerably better than any other site on the outskirts of Chippenham in terms of access to a railway station and accessibility. However it does not. Furthermore no clear explanation of why it does not is offered.
- 8.1.24 Of the three sites that scored higher, one site is the land to the North of Chippenham that forms part of both options, one site is too small to cater for the projected housing need for Chippenham, and the other is at the very edge of Chippenham to the South. Given this, the results of the report are highly questionable. The weighting given to the proximity to the town centre and railway station should be significantly increased to reflect the Strategic Objectives for Wiltshire and Objectives for Chippenham.
- 8.1.25 In conclusion, the evidence base informing the Core Strategy (including the Sustainability Appraisal, Sustainability Appraisal Scoping Report and Topic Paper 11) all identify the need for sustainable development and for development to be located such that it can support the vitality and viability of the town centre of Chippenham, whilst encouraging cycling and walking to the centre and railway station.

8.1.26 The East of Chippenham site is the closest of the sites to the town centre of Chippenham, closest to the railway station and within walking distance of both. The East of Chippenham site should therefore score higher than Options 1 and 2 in terms of sustainability and transport and yet it scores the same. This indicates that the weighting system is flawed and does not support the Core Strategy in terms of Options 1 and 2 being the best options for future growth in Chippenham in terms of sustainability and transport.

## 9 SUMMARY AND CONCLUSIONS

- 9.1 The strategic housing requirement for Wiltshire, set at 37,000 new homes, is considerably underestimated. The forecast methodology used to predict ranges of future housing need is fundamentally flawed. It is unrealistic to base forecasts of housing need on a 'nil net outward migration' scenario for employment purposes when Government evidence confirms precisely the opposite.
- 9.2 It is also unrealistic to utilise recent very low house building completion rates to forecast requirements when that past supply has been considerably (even unreasonably) constrained through the planning process.
- 9.3 The suggestion that a considerable increase in the supply of housing land would only deliver marginal benefit to the delivery of affordable housing is not good reason to constrain market housing land supply to unrealistically low levels.
- 9.4 The Core Strategy must also take into account the new draft NPPF. In particular, Policy 109 calls for a thoroughly researched evidence base and a 5 year plus 20% rolling supply of housing land.
- 9.5 The Core Strategy should therefore focus upon strategic allocations for significant housing growth that are capable of meeting National Government objectives. The emerging Core Strategy, as now consulted upon, does precisely the opposite and it is therefore unsound.
- 9.6 No proper account has been taken of the new homes bonus and the considerable advantages that could accrue from this.
- 9.7 Wiltshire Council, in the absence of any credible evidence base is therefore urged to revert to the RSS supply figures.
- 9.8 The infrastructure delivery plan rightly promotes the concentration of land allocations for new development in order to deliver essential improvements that will make a tangible difference to the health and prosperity of Chippenham. There is no good reason to discount land to the East of Chippenham on the unfounded assumption that it cannot deliver such tangible benefits. It can.
- 9.9 Matters of infrastructure improvement, the cost, phasing and delivery can easily be accommodated by the market, given the considerable uplift in land value from rural/agricultural purposes to development value.
- 9.10 Evidence prepared by PFA Consultants and submitted with this consultation demonstrate that average journey times in Chippenham can be reduced by up to 30% during morning and evening peak periods as a direct consequence of

- building the North - East link road. The benefits for the town centre and the A350 will be considerable.
- 9.11 No such benefit will accrue with Options 1 or 2. In fact the reverse will be true as they largely rely on the congested A350.
- 9.12 The Sustainability Appraisal and its appreciation of environmental impact is, unfortunately, wholly unsound. It is a completely inadequate basis on which to compare strategic site allocations and take critical decisions. The Appraisal requires a complete reassessment of work undertaken since 2009 if it is to be of any credible assistance in the Core Strategy formulation.
- 9.13 In particular, Appendix C of the Sustainability Appraisal, notes that the criteria used to assess significant effects are '*guidelines only to help improve objectivity*'. The guidelines provided do not constitute evidence and therefore the entire spatial strategy and policy is founded on subjective, arbitrary assumptions. This is most unsatisfactory and unsound.
- 9.14 The Spatial Strategy emerging from the evidence base is also unsound. Whilst the spatial principles relating to site identification and selection are laudable, the suggested outcome, deleting the 2009 Preferred Option (with its well researched evidence base) and promoting new Options 1 and 2, completely defies common sense. The land to the East of Chippenham is by far the best greenfield site to meet the identified needs and stated objectives for the Core Strategy and the town of Chippenham as a whole.
- 9.15 For wholly unexplained and unfathomable reasons, the Sustainability Appraisal has been heavily weighted such that land to the South of the town, in a remote and comparatively inaccessible location, is afforded primacy.
- 9.16 Therefore, despite platitudes and policies seeking to achieve genuine sustainability, the two options provided for consideration will effectively promote car borne dependence and increase CO<sub>2</sub> emissions, in stark contrast to stated Regional, National and European policy objectives.
- 9.17 There is also an alarming lack of evidence itself in the Sustainability Appraisal. There are no expert surveys, reports such as traffic assessments, ecological assessments or even visual impact appraisals which should have been prepared in accordance with good professional practice.
- 9.18 The majority of Topic Papers themselves are a mass of almost incomprehensible tables, matrices and discussion which do not aid ready comparison and which do not withstand detailed scrutiny.

- 9.19 Absolutely no weighting has been applied in the Sustainability Appraisal to the fundamental plan objectives. The reader is left with no understanding as to whether allocating land for economic and housing growth is more important than matters of local biodiversity or waste management. It is implausible to believe that all matters have equal weight and status in an assessment process, where the core objectives indicate otherwise.
- 9.20 Furthermore the scoring system allocated to the Sustainability Appraisal, containing six gradings or marks is far too simplistic. It results in many sites achieving the same or very similar end results. There is no transparency on how the scores are awarded and, ultimately, many competing sites and objectives achieve the same result. Curiously, however, two sites emerge as strategic priority without proper or full explanation.
- 9.21 Given the obvious shortcomings and unsound nature of the Sustainability Appraisal evidence base, it is therefore not surprising that the spatial strategy upon which it is based, is also fundamentally unsound.
- 9.22 Land to the East of Chippenham appears to have been dismissed as it is allegedly not required to meet the identified lower housing target and concerns expressed on land to meet the immediate employment need. A strategic plan, valid up to the year 2026, should take a longer term view and thoroughly investigate the opening of a new access corridor to the north and east to provide a more sustainable strategy for economic and housing growth.
- 9.23 The forecast tools used for employment growth are contradictory and complex. There appears to be no attempt to make a qualitative assessment of market requirements, which are effectively polarised between B1 and B8 uses. The needs of high quality B1 office accommodation, such as that set out in the Civil Service Hub Brief, call for town centre proximity and connectivity. However, the majority of sites now proposed under Options 1 and 2 for new employment growth in the south, completely fail to meet the exacting and most recent Government Brief requirements. This is woeful, whether or not the Hub comes to Chippenham. The fundamental point is that the future employment strategy simply cannot afford to completely ignore such inward investment potential.
- 9.24 Additionally, some land, such as that to the West of Chippenham could be suitable for large scale distribution and warehousing uses. Whilst development of this nature generates a relatively low job density, it is valuable institutional investment that should be welcomed. The land to the West of Chippenham and the A350 is capable of forging strong links with the town centre and utilising existing infrastructure. It should therefore be actively considered for warehousing and distribution uses.

- 9.25 Ultimately, it is apparent that a strategy concentrated in the North and East of Chippenham, which will deliver essential infrastructure, represents the best and most sustainable employment land option possible.
- 9.26 The supply of employment land in Chippenham is extremely limited and a failure to deliver the whole range of market needs in a meaningful and qualitative manner will ensure that the economy of Chippenham and Wiltshire, as a whole, will suffer badly.
- 9.27 It is also clear that the two site options currently under consideration, involving large allocations of land to the South of Chippenham will, out of location necessity, increase car borne dependence. Therefore CO<sub>2</sub> emissions will inevitably rise. Options 1 and 2 should not form part of any strategy or plan that claims to have sustainability and rigorous appraisal techniques at its heart. The suggested strategic allocations in the South are disingenuous and therefore ought to be deleted.
- 9.28 Protecting existing employment land, such as Langley Park, is also an essential part of the Plan strategy, to promote the health and vitality of town centres. The allocation of 250 homes at Langley Park is wholly misguided and no account is taken of improving its access and connectivity to the town. The strategy and reasoning behind the housing allocation is of very poor quality indeed. The same is true of Hunter's Moon which should continue to be allocated for employment purposes.
- 9.29 The transport objective is laudable and promotes a spatial strategy based on reducing the need to travel whilst promoting town centre access and connectivity. However, the reality of the transport strategy is manifested in the two option sites promoted. The mismatch between policy and its application is most alarming. A spatial strategy produced wholly without reference to a sequential assessment, which promotes a 'town centre first' approach, is also most alarming. The evidence base should include a rigorous Sequential Assessment with travel time isochrones to the town centre as part of the selection strategy. It is sadly lacking.
- 9.30 Any site selection strategy should also rigorously assess the range of transport modes available, including walking, cycling, public transport and, by necessity, the private motor car. A clear rationale for identifying and weighting the likely modes of travel between one possible preferred location and the town centre should be pre-requisite of any evidence base. Once again, it is missing.
- 9.31 In commenting on appropriate planning process, the Core Strategy and its evidence base, should have been mindful of the guidance within Planning Policy Guidance Note 12: Local Development Frameworks. Paragraph 4.23 of PPS12

clarifies that when assessing a Core Strategy, it must not only satisfy the statutory requirements for its preparation but it should also be sound.

- 9.32 Paragraph 4.24 of PPS12 states that for a Core Strategy to be sound it should be founded on a robust and credible evidence base and represent the most appropriate strategy when considered against reasonable alternatives.
- 9.33 We are strongly of the opinion that the Core Strategy as currently drafted is not sound as the most recent evidence base (prepared since 2009) is not robust or credible. There are a multitude of reasons, all set out in this submission.
- 9.34 Common sense dictates that the 2 Options for development in Chippenham, detailed in Chapter 5 of the Core Strategy, are not the most appropriate strategy for the required employment and housing growth.
- 9.35 This submission demonstrates that the land to the East of Chippenham is far preferable. It would provide more tangible benefits for the town as a whole, it is more sustainably located, it promotes alternative modes of transport in a meaningful way, it can allocate a sufficient number of new homes going beyond 2026 (if required) and it is entirely deliverable as part of a phased employment land led strategy, to include development in the North and East of Chippenham.
- 9.36 Overall, and in conclusion, whilst the emerging Core Strategy recognises the national policy arena and states laudable objectives, its application in this instance is unsound. In particular:-
- The housing land allocation is far too low and uses an unsound methodology;
  - The employment land strategy fails to take into account any qualitative assessment and assumes that the majority of land located to the south of Chippenham will meet all market needs;
  - The spatial strategy and transport strategy utterly fail to adopt a sequential approach or promote the town centre;
  - The most recent workings of the Sustainability Appraisal which are used to underpin the site allocation preferences are seriously flawed. They do not constitute a proper evidence base.
- 9.37 Therefore, it is absolutely essential that;
- The most recent, post 2009, workings of the Sustainability Appraisal and it's consequent site allocations comprising options 1 and 2 are formally abandoned.

- The 2009 Preferred Option to develop land in the North and East of Chippenham is reinstated, recognising its superior location and most sustainable attributes.
- That the housing land allocation reverts back to the previous RSS evidence base which was comprehensive and sound.
- That a credible employment land strategy is put in place recognising the wholly different qualitative needs of commerce and industry.

9.38 To continue to pursue the current options will result in the promotion of a wholly unsustainable and unsound draft Core strategy which will fall well short of requirements set out in PPS12 and which will fail when subjected to legal challenge

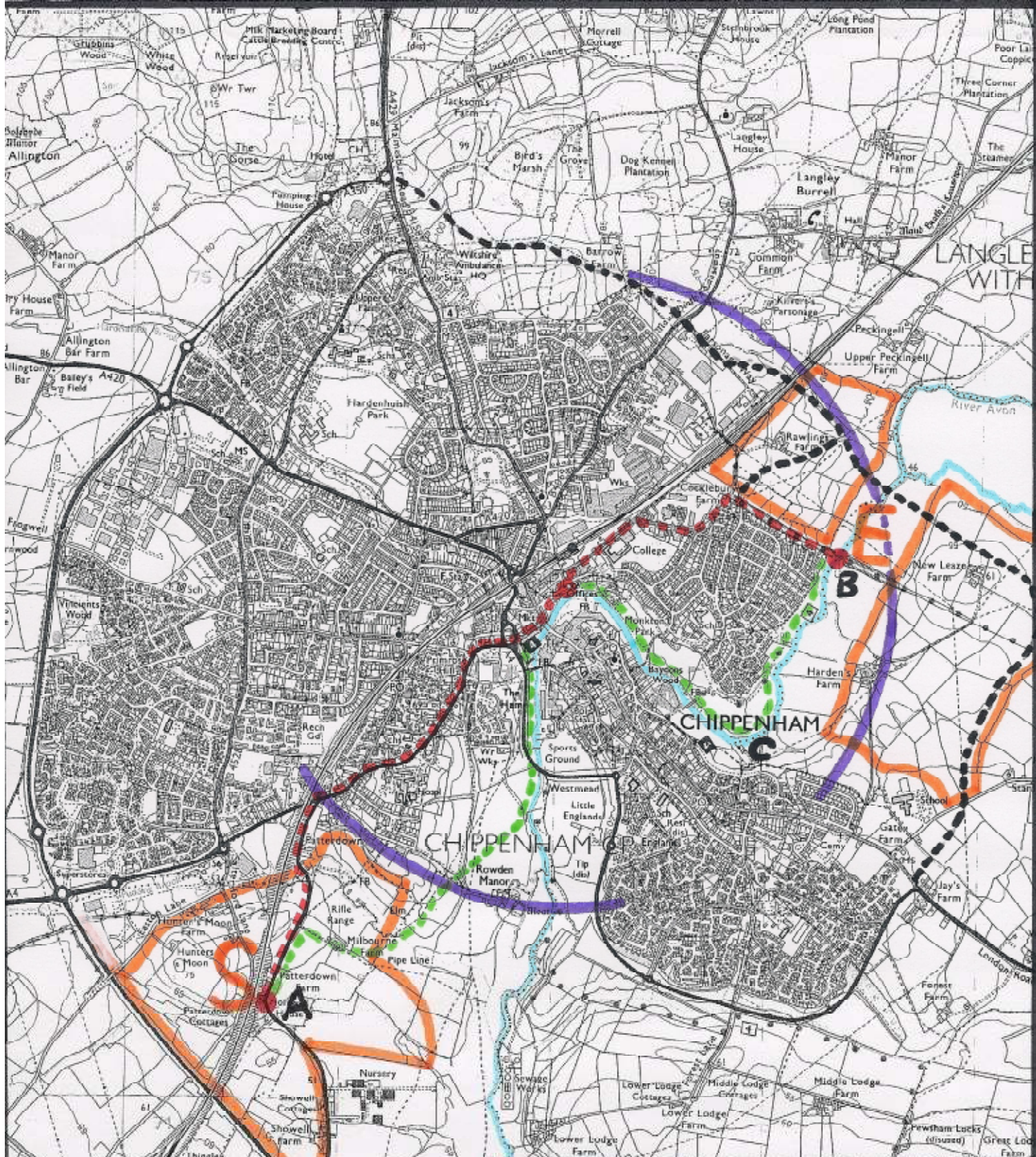
9.39 Chippenham 2020 are utterly committed to working positively with both Officers and Members of the Council to deliver a strategy that is right for the town and ensure a sustainable prosperous future for all.



## **Appendix 1** PFA Consultants, Highway Evidence

See separate document

## **Appendix 2** Travel Time and Walking Distance to Town Centre



**Walking Options - South or East?**

Shortest Route	Minutes	Miles	
<b>South</b>			
Centre to A	29	1.8	5 main road crossings
<b>East</b>			
Centre to B	16	1	1 minor road crossing
<b>River Route</b>	Minutes	Miles	
<b>South</b>			