

# AGENDA

---

Meeting: **Cabinet**  
Place: **The Kennet Room - County Hall, Trowbridge BA14 8JN**  
Date: **Tuesday 14 March 2017**  
Time: **9.30 am**

---

Please direct any enquiries on this Agenda to Yamina Rhouati, of Democratic Services, County Hall, Trowbridge, direct line 01225 718024 or email [Yamina.Rhouati@wiltshire.gov.uk](mailto:Yamina.Rhouati@wiltshire.gov.uk)

Press enquiries to Communications on direct lines (01225)713114/713115.

All public reports referred to on this agenda are available on the Council's website at [www.wiltshire.gov.uk](http://www.wiltshire.gov.uk)

---

## Membership:

Cllr Baroness Scott of Bybrook OBE	Leader of the Council
Cllr John Thomson	Deputy Leader and Cabinet Member for Communities, Campuses, Area Boards and Broadband
Cllr Fleur de Rhé-Philippe	Cabinet Member for Economic Development, Skills, Strategic Transport and Strategic Property
Cllr Laura Mayes	Cabinet Member for Children's Services
Cllr Jonathon Seed	Cabinet Member for Housing, Leisure, Libraries and Flooding
Cllr Toby Sturgis	Cabinet Member for Strategic Planning, Development Management, Strategic Housing, Operational Property and Waste
Cllr Dick Tonge	Cabinet Member for Finance
Cllr Jerry Wickham	Cabinet Member for Health (including Public Health) and Adult Social Care
Cllr Stuart Wheeler	Cabinet Member for Hubs, Heritage and Arts, Governance and Support Services
Cllr Philip Whitehead	Cabinet Member for Highways and Transport

---

## **Recording and Broadcasting Information**

Wiltshire Council may record this meeting for live and/or subsequent broadcast on the Council's website at <http://www.wiltshire.public-i.tv>. At the start of the meeting, the Chairman will confirm if all or part of the meeting is being recorded. The images and sound recordings may also be used for training purposes within the Council.

By entering the meeting room you are consenting to being recorded and to the use of those images and recordings for broadcasting and/or training purposes.

The meeting may also be recorded by the press or members of the public.

Any person or organisation choosing to film, record or broadcast any meeting of the Council, its Cabinet or committees is responsible for any claims or other liability resulting from them so doing and by choosing to film, record or broadcast proceedings they accept that they are required to indemnify the Council, its members and officers in relation to any such claims or liabilities.

Details of the Council's Guidance on the Recording and Webcasting of Meetings is available on request.

## **Parking**

To find car parks by area follow [this link](#). The three Wiltshire Council Hubs where most meetings will be held are as follows:

**County Hall, Trowbridge**  
**Bourne Hill, Salisbury**  
**Monkton Park, Chippenham**

County Hall and Monkton Park have some limited visitor parking. Please note for meetings at County Hall you will need to log your car's registration details upon your arrival in reception using the tablet provided. If you may be attending a meeting for more than 2 hours, please provide your registration details to the Democratic Services Officer, who will arrange for your stay to be extended.

## **Public Participation**

Please see the agenda list on following pages for details of deadlines for submission of questions and statements for this meeting.

The full constitution can be found at [this link](#). Cabinet Procedure rules are found at Part 6.

For assistance on these and other matters please contact the officer named above for details

## Part I

### Items to be considered while the meeting is open to the public

Key Decisions Matters defined as 'Key' Decisions and included in the Council's Forward Work Plan are shown as 

1 **Apologies**

2 **Minutes of the previous meeting** (*Pages 7 - 14*)

To confirm and sign the minutes of the Cabinet meeting held on 7 February 2017, previously circulated.

3 **Declarations of Interest**

To receive any declarations of disclosable interests or dispensations granted by the Standards Committee.

4 **Leader's announcements**

5 **Public participation and Questions from Councillors**

The Council welcomes contributions from members of the public. This meeting is open to the public, who may ask a question or make a statement. Questions may also be asked by members of the Council. Written notice of questions or statements should be given to Yamina Rhouati of Democratic Services by 12.00 noon on Thursday 9 March 2017. Anyone wishing to ask a question or make a statement should contact the officer named above.

6 **Performance Management and Risk Outturn Report: Q3 2016/17** (*Pages 15 - 36*)





Report by Dr Carlton Brand and Carolyn Godfrey, Corporate Directors

7 **Wiltshire Council 2016 staff survey outcomes** (*Pages 37 - 56*)

Report by Dr Carlton Brand, Corporate Director

8 **Report on Treasury Management Strategy 2016/2017 – Third Quarter ended 31 December 2016** (*Pages 57 - 68*)

Report by Carolyn Godfrey, Corporate Director

- 9 **Adoption Chippenham Site Allocations Plan** (*Pages 69 - 226*)  
 Report by Dr Carlton Brand, Corporate Director
- 10 **A303 Amesbury to Berwick Down Road Scheme** (*Pages 227 - 262*)  
 Report by Dr Carlton Brand, Corporate Director
- 11 **Wiltshire Council's Housing Board Annual Report** (*Pages 263 - 284*)  
Report by Carolyn Godfrey, Corporate Director
- 12 **Sub Regional Independent Fostering Framework** (*Pages 285 - 292*)  
 Report by Carolyn Godfrey, Corporate Director
- 13 **Care Home Tender - Contract Awards** (*Pages 293 - 302*)  
 Report by Carolyn Godfrey, Corporate Director
- 14 **Governance arrangements for the prioritisation of Community Infrastructure Levy (CIL) spending** (*Pages 303 - 310*)  
Report by Dr Carlton Brand, Corporate Director

15 **Urgent Items**

Any other items of business, which the Leader agrees to consider as a matter of urgency.

**Part II**

**Items during consideration of which it is recommended that the public should be excluded because of the likelihood that exempt information would be disclosed**

16 **Exclusion of the Press and Public**

This is to give further notice in accordance with paragraph 5 (4) and 5 (5) of the Local Authorities (Executive Arrangements) (Meetings and Access to Information) (England) Regulations 2012 of the intention to take the following item in private.

To consider passing the following resolution:

To agree that in accordance with Section 100A(4) of the Local Government Act 1972 to exclude the public from the meeting for the business specified in Items Number 17, 18, 19 and 20 because it is likely that if members of the public were present there would be disclosure to them of exempt information as defined in paragraph 3 of Part I of Schedule 12A to the Act and the public interest in withholding the information outweighs the public interest in disclosing the information to the public.

Reason for taking item in private:

Paragraph 3 - information relating to the financial or business affairs of any particular person (including the authority holding that information).

17 **Care Home Tender - Contract Awards (Part ii)** *(Pages 311 - 318)*



Report by Carolyn Godfrey, Corporate Director

18 **Governance arrangements for the prioritisation of Community Infrastructure Levy (CIL) spending** *(Pages 319 - 322)*

Report by Dr Carlton Brand, Corporate Director

19 **Porton Business Plan** *(Pages 323 - 374)*

Report by Dr Carlton Brand, Corporate Director

20 **Procurement of housing repairs and maintenance service** *(Pages 375 - 408)*



Report by Dr Carlton Brand, Corporate Director

Our vision is to create stronger and more resilient communities. Our priorities are: To protect those who are most vulnerable; to boost the local economy - creating and safeguarding jobs; and to support and empower communities to do more themselves.

This page is intentionally left blank

## **CABINET**

---

### **DRAFT MINUTES OF THE CABINET MEETING HELD ON 7 FEBRUARY 2017 AT THE KENNET ROOM - COUNTY HALL, TROWBRIDGE BA14 8JN.**

#### **Present:**

Cllr Baroness Scott of Bybrook OBE, Cllr John Thomson, Cllr Fleur de Rhé-Philippe, Cllr Laura Mayes, Cllr Jonathon Seed, Cllr Toby Sturgis, Cllr Dick Tonge, Cllr Jerry Wickham, Cllr Stuart Wheeler and Cllr Philip Whitehead

#### **Also Present:**

Cllr Anna Cuthbert, Cllr Jon Hubbard, Cllr Richard Gamble, Cllr Allison Bucknell, Cllr Richard Clewer, Cllr Bridget Wayman, Cllr Glenis Ansell, Cllr Simon Killane and Cllr Horace Prickett and Cllr Macdonald

---

#### **11 Apologies**

There were apologies received as all members of the Cabinet were in attendance.

#### **12 Minutes of the previous meeting**

The minutes of the meeting held on 17 January 2017 were presented.

#### **Resolved**

**To approve as a correct record and sign the minutes of the meeting held on 17 January 2017.**

#### **13 Minutes - Capital Assets Committee**

The minutes of the meeting held on 17 January 2017 were presented.

#### **Resolved**

**To note the minutes of the meeting held on 17 January 2017.**

#### **14 Declarations of Interest**

There were no declarations of interest.

#### **15 Leader's announcements**

The Leader confirmed that this meeting would be webcast live.

The Leader announced that with the consent of the meeting, she would be leaving the meeting early, at which point, the Deputy Leader would assume the Chair. The Leader also explained that the item on the Wiltshire Council's Financial Plan 2017/18 would be taken at the start of the agenda immediately after Public Participation.

16 **Public participation and Questions from Councillors**

Councillor Jon Hubbard offered his thanks, and those of two of his local constituents, to Councillor Jerry Wickham for his and his officers' efforts in becoming only the second area in the County to have signed, jointly with the Wiltshire Clinical Commissioning Group (CCG), the Motor Neurone Disease charter.

Councillor Wickham thanked Councillor Hubbard for raising the issue with him, and that he was very pleased to have the CCG involved as it would make the signing of the charter more impactful.

There were no questions from members of the public and the Leader explained that anyone present, elected members or public could raise issues relating to items on the agenda.

17 **Wiltshire Council's Financial Plan 2017/18**

The Leader presented the report which outlined the draft proposals to Council at its budget meeting on 21 February 2017 for the adoption of Wiltshire Council's Financial Plan 2017/18. In addition, the Leader presented amendments to these proposals, circulated at the meeting and available as a supplement.

It was noted that the amendments had been considered by the relevant officers and judged to be viable and deliverable, would do not impact adversely on the substantive proposals as they would not change the net budget requirement, the level of Council Tax or reserves proposed.

The Leader invited Councillor Dick Tonge to present the budget report and other Cabinet Members to highlight any proposals within their respective portfolios.

The Leader invited Councillor Simon Killane and Councillor Glenis Ansell to comment on the scrutiny process. The report of the Financial Planning Task Group chaired by Cllr Ansell held on 27 January and the report of the Overview and Scrutiny Management Committee chaired by Cllr Killane held on 1 February as published were referred to. The Leader thanked scrutiny for its input into the budget process. The Overview and Scrutiny Management Committee would at its meeting on 14 February consider any opposition amendments to the budget. The Leader suggested that this would be an opportunity for Scrutiny to consider the Administration's amendments presented and this was agreed by Cllr Killane.



The s151 Officer confirmed that there had not been final confirmation from the Government as to the financial settlement, and that any movement would be dealt with from reserves.

## **Resolved**

### **To recommend that Council:**

**a. Endorses the update of the Financial Plan for 2017/18.**

**b. Approve the investment and savings proposals summarised at Sections 7 and 9 respectively of this report and at Appendix 1, to provide a net revenue budget for 2017/18 of £311.351 million.**

**c. To vote separately:**

**i. Set the Council's total net expenditure budget for 2017/18 at £311.351 million.**

**ii. Revise the Social Care Levy proposed to Council in October 2016 and propose a further 1% increase to 3%, with the Council Tax increase remaining in line with Council's October decision, at 1.99%**

**iii. Approve the Capital programme proposed at Appendix 1E of this report.**

**iv. Set the changes in fees and charges set out in detail at Section 8 of and at Appendix 1G of this report.**

**v. Set a 1% reduction for social dwelling rents.**

**vi. Set the Housing Revenue Account (HRA) Budget for 2017/18 as set out at Appendix 1F of this report.**

**vii. That all other service charges related to the HRA be increased by CPI plus 1%, including garage rents.**

**d. That the following amendments be incorporated into the recommendation:**

**i) Visit Wiltshire – to limit the reduction in the grant funding to £50,000.**

**ii) Wiltshire Parent Carers Council (WPCC), increase investment by £50,000.**

**iii) Extend the opening hours at Salisbury (Churchfields), Chippenham (Stanton St Quintin) and Trowbridge (Canal Road) Household Recycling Centres (HRCs) by one day per week from April to October by investing an additional £175,000.**

iv) **Additional £100,000 investment in the development of staff.**

**To be funded from:**

v) **Marketing and communications to find £175,000.**

vi) **To fund £200,000 of Preventative Property Maintenance from Whole Life Capital funding.**

e. **That the above mentioned amendments to the budget be referred to the Overview and Scrutiny Management Committee at its meeting on 14 February 2017 for consideration and comment.**

*Reason for Decision:*

*To enable Council to:*

*Set its revenue, capital, housing revenue accounts, fees and charges, levels of reserves and resultant Council Tax and Social Care Levy for 2017/18, as well as to issue Council Tax and rent bills.*

*Provide the Council with a strong business and financial plan for sustainable delivery for 2017-18.*

## 18 **Revenue Budget Monitoring**

Councillor Dick Tonge presented the report which advised members of the revenue budget monitoring position as at the end of period 9 (end of December 2016) for the financial year 2016/2017 with suggested actions as appropriate. In presenting the report, Councillor Tonge outlined the variances and the actions taken to address overspends.

The Leader thanked Councillor Tonge for the report and commended Cabinet Members and officers for working hard to address these issues.

### **Resolved**

**To note the outcome of the period 9 (end of December) budget monitoring.**

*Reason for Decision:*

*To inform effective decision making and ensure a sound financial control environment.*

## 19 **Capital Budget Monitoring**

Councillor Dick Tonge presented the report which informed Cabinet on the position of the 2016/2017 Capital Programme, as at Period 9 (end of December 2016), including highlighting budget changes. A budget monitoring report to members is taken to

Cabinet Capital Assets Committee quarterly in September, December, February and June. The report presented focused on major variations in the budget.

#### **Resolved**

- 1. To note the budget movements undertaken to the capital programme shown in appendices A and B; including reprogramming of £14.142 million between 2016/2017 and 2017/2018.**
- 2. To also note the position of the capital programme in Appendix A of the report presented.**

*Reason for Decision:*

*To inform Cabinet of the position of the 2016/2017 capital programme as at Period 9 (and of December 2016), including highlighting any budget changes.*

#### **20 Treasury Management Strategy 2017-18**

Councillor Dick Tonge presented the report which requested Cabinet to consider and recommend that the Council approve the Prudential and Treasury Indicators, together with the Treasury Management Strategy for 2017/2018. In presenting the report, Councillor Tonge explained that the Icelandic bank debt had fallen to the point where it was now being dealt with as part of the normal debtors processes.

In response to a question from Councillor Glenis Ansell, the s151 Officer confirmed that the local authorities did not have a separate credit rating.

#### **Resolved**

**To recommend that the Council:**

- a) adopt the Prudential and Treasury Indicators (Appendix A) of the report presented.**
- b) adopt the Annual Investment Strategy (Appendix B) of the report presented.**
- c) delegate to the Associate Director, Finance the authority to vary the amount of borrowing and other long term liabilities within both the Treasury Indicators for the Authorised Limit and the Operational Boundary;**
- d) authorise the Associate Director, Finance to agree the restructuring of existing long-term loans where savings are achievable or to enhance the long term portfolio;**
- e) agree that short term cash surpluses and deficits continue to be managed through temporary loans and deposits; and**

- f) agree that any surplus cash balances not required to cover borrowing are placed in authorised money-market funds, particularly where this is more cost effective than short term deposits and delegate to the Associate Director, Finance the authority to select such funds.

*Reason for Decisions*

*To enable the Council to agree a Treasury Management Strategy for 2017/2018 and set Prudential Indicators that comply with statutory guidance and reflect best practice.*

**Councillor John Thomson, Deputy Leader in the Chair**

21 **Wiltshire Playing Pitch Strategy**

**Key** Councillor Jonathon Seed presented the report which considers the background and context to the development of the Council's first Playing Pitch Strategy, which comprised four documents; the Wiltshire Playing Pitch Strategy; the Action Plan; the Community Area Profiles; the full needs assessment. Cabinet was requested to formally adopt the Wiltshire Playing Pitch Strategy and associated documents that would be used in decision making and to inform the development of planning policy.

In presenting the report, Councillor Seed stated that: the document and maps would be updated as further information was received; that the link between sport and health was key; and that he would be happy to consider any specific issues raised by Members as part of this process.

**Resolved**

- a) **To formally adopt the Wiltshire Playing Pitch Strategy, Action Plan, Community Area Profiles and Needs Assessment to inform decision making and policy development.**
- b) **That the Strategy Development Steering Group is to evolve into the body overseeing the Playing Pitch Strategy on behalf of the Council and reporting to the relevant Cabinet officers on an annual basis, with an annual report to be provided to Environment Select Committee. This group to be renamed the Wiltshire Playing Pitch Strategy Implementation Group.**

*Reasons for Decisions:*

*A Playing Pitch Strategy for Wiltshire is an important document that underpins the core strategy and provides robust evidence for organisations such as Sport England who are statutory consultees in the planning process. Whilst not a statutory requirement in itself, the Playing Pitch Strategy is vital in providing an*

*informed evidence base for the protection and future development of formal outdoor space.*

*The Playing Pitch Strategy will help to influence a variety of local authority functions, policy development and decision making in respect of the community playing pitch stock, including planning policy and planning applications, educational provision, funding, facility and asset management, development of pitch based sports, public health and the management and maintenance of provision.*

*The presence of a Playing Pitch Strategy is seen as best practice by the Department for Culture Media and Sport and Sport England.*

22 **School Admission 2018/19**

Councillor Laura Mayes presented the report which presented the four elements of the Admissions Policy which, following consultation, were required to be determined by Cabinet. Councillor Mayes, in presenting her report, commended the staff for their hard work and commented on the increase in the number of parents accessing the service online.

**Resolved**

**To approve:**

- a) **the proposed scheme for the co-ordination of admission to secondary schools for 2018/19.**
- b) **the proposed scheme for the co-ordination of admissions to primary schools for 2018/19.**
- c) **the proposed admission arrangements for Voluntary Controlled & Community Secondary Schools for 2018/19.**
- d) **the proposed admission arrangements for Voluntary Controlled & Community Primary Schools for 2018/19.**

*Reason for Decision:*

*The Local Authority has a statutory duty to have a determined admission policy for 2018/19 in place on or before 28 February 2017.*

23 **Urgent Items**

There were no urgent items.

24 **Exclusion of the Press and Public**

**Resolved:**

**To agree that in accordance with Section 100A(4) of the Local Government Act 1972 to exclude the public from the meeting for the following item of business because it is likely that if members of the public were present there would disclosure to them of exempt information as defined in paragraph 3 of Part I of Schedule 12A to the Act and the public interest in withholding the information outweighed the public interest in disclosing the information to the public.**

Reason for taking the item in private:

Paragraph 3 – information relating to the financial information or business affairs of any particular person (including the authority holding that information)

No representations had been received as to why this item should not be held in private.

25 **Procurement of housing related support contract**

**Key** Councillor Jonathon Seed presented a report which sought to obtain delegated approval to proceed with the procurement exercise to recommission housing related support services to meet the identified needs of a range of customer groups within the approved budget.

**Resolved**

- 1. To approve the commencement of re-commissioning of housing related support services ensuring that there is a balance of housing related support services provided across all customer groups which will reflect the up to date needs; and**
- 2. To delegates authority to the Associate Director for Housing, following consultation with the Cabinet Member for Housing, Leisure, Libraries and Flooding and the Cabinet for Finance, to award contracts within the approved budget**

(Duration of meeting: 9.30 - 10.46 am)

These decisions were published, earlier, on 10 February 2017 and will come into force on 20 February 2017

The Officer who has produced these minutes is Yamina Rhouati of Democratic Services, direct line 01225 718024, e-mail [Yamina.Rhouati@wiltshire.gov.uk](mailto:Yamina.Rhouati@wiltshire.gov.uk)

Press enquiries to Communications, direct lines (01225) 713114/713115

**Wiltshire Council**

**Cabinet**

**14 March 2017**

---

**Subject: Performance Management and Risk Outturn Report: Q3 2016/17**

**Cabinet member: Councillor Dick Tonge – Cabinet Member for Finance**

**Key Decision: No**

---

### **Executive Summary**

This report provides an update on third quarter outturns against the measures and activities compiled and reported through the council's website via the [Citizens' Dashboard](#) and other key measures, as well as latest outturns on the council's strategic risk register.

### **Proposals**

Cabinet to note updates and outturns

1. Against the measures and activities ascribed against the council's key outcomes.
2. To the strategic risk register.

### **Reason for Proposal**

The performance framework compiles and monitors outturns in relation to the outcomes laid out in Wiltshire Council's Business Plan. The framework is distilled from individual services' delivery plans. In doing so, it captures the main focus of activities of the council against each outcome.

The strategic risk register captures and monitors significant risks facing the council: in relation to significant in-service risks facing individual areas, in managing its business across the authority generally and in assuring our preparedness should a national risk event occur.

**Carlton Brand & Carolyn Godfrey**  
**Corporate Directors**

**14 March 2017**

---

**Subject: Performance Management and Risk Outturn Report: Q3 2016/17**

**Cabinet member: Councillor Dick Tonge – Cabinet Member for Finance**

**Key Decision: No**

---

### **Purpose of Report**

1. This report provides a quarter three update on outturns against the measures and activities compiled and reported through the council's website via the [Citizens' Dashboard](#) and other key measures, as well as latest outturns on the council's strategic risk register.

### **Relevance to the Council's Business Plan**

2. This report updates Cabinet on outturns and significant activities against each of the outcomes contained in the Business Plan.

### **Overview of outturns**

3. Measures presented on the [Citizens' Dashboard](#) were revised, using information drawn from individual services. These measures form the basis of the performance framework used to monitor progress through 2016/17, against the objectives set out in the Business Plan.
4. At the start of the current financial year the performance framework was reviewed for relevance against both the Business Plan and the work of council services.
5. In addition to headline measures in the Citizens' Dashboard the performance framework includes measures drawn from service areas that add to the overall understanding of progress against the business plan outcomes.
6. A summary of key published measures – as well as some more general supporting information about each theme – is provided below.

### **Outcome 1: thriving and growing local economy**

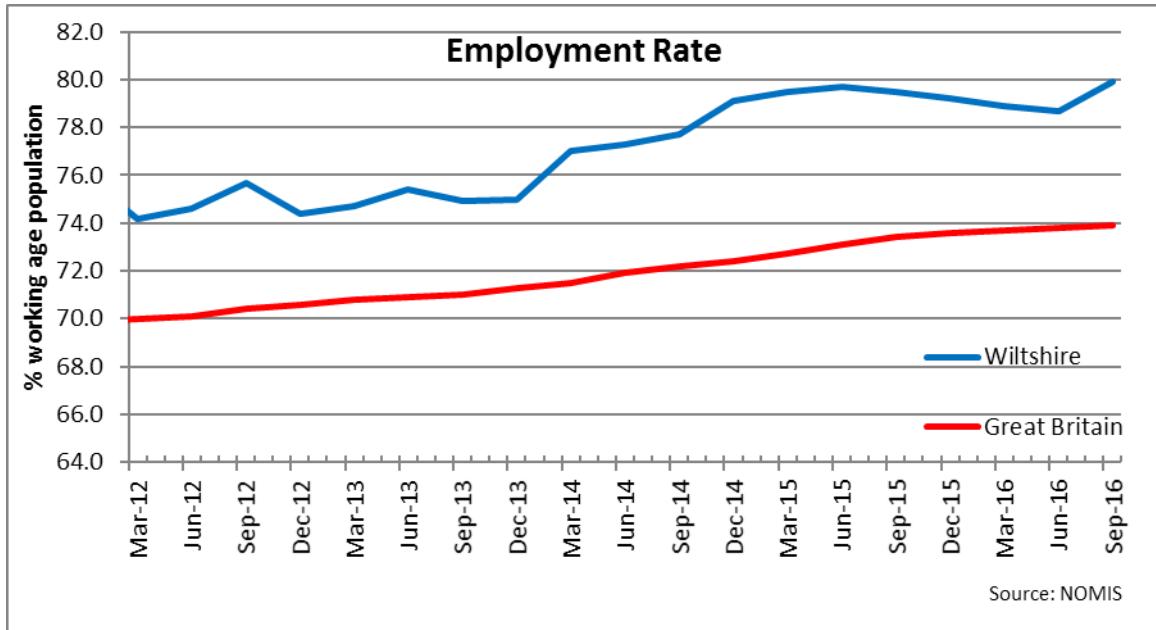
7. Wiltshire has been adjudged the most economically vibrant area in England in terms of resilience and sustainability by Grant Thornton. The measure is one of six baskets of indicators measured by the [Vibrant Economy Index](#). Overall, Wiltshire was ranked 20th out of all 320 local authority areas in England for how well it enables business, communities and individuals to thrive. Wiltshire performs well across all six baskets



with its lowest comparative score (in Inclusion and Equality) still putting the county in the top 36% of local authority areas.

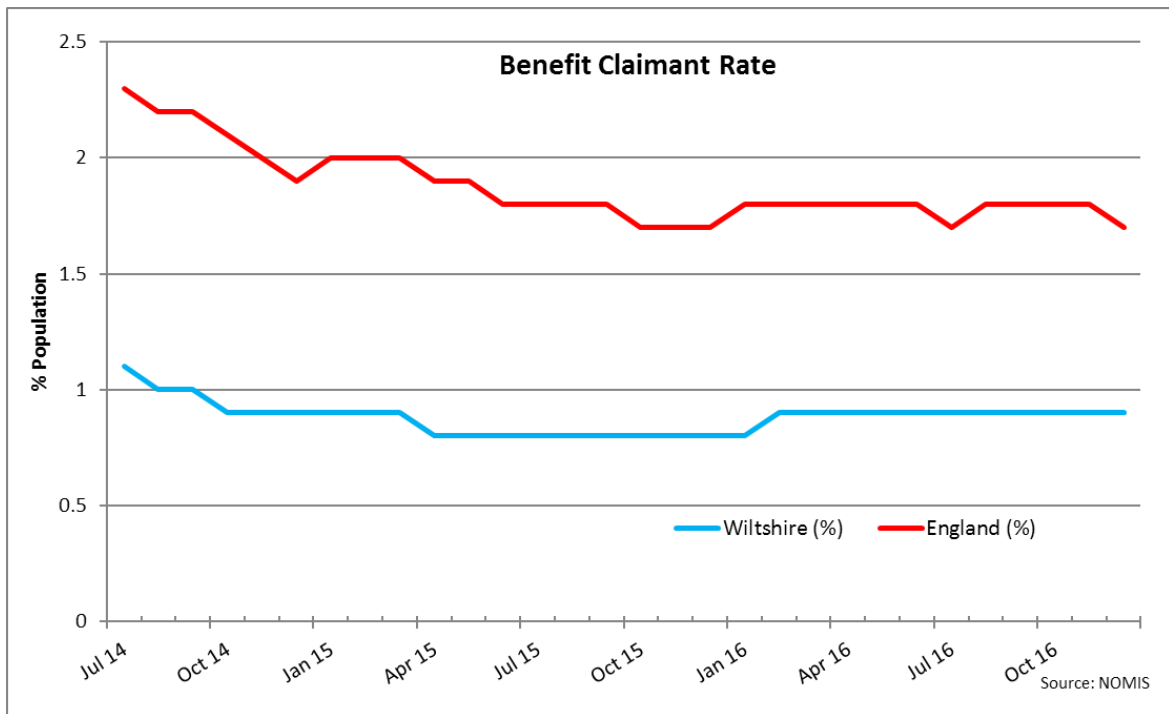
Basket of measures	Types of measures	Wiltshire rank (of 320)
<b>Prosperity</b>	Values added in an area, Types of employment, Proportion of business with a large turnover, Proportion of foreign owned business	103
<b>Dynamism and opportunity</b>	Business created and patents granted, Skills and knowledge in workforce, Academic qualifications	56
<b>Inclusion and Equality</b>	Employment levels, Poverty and deprivation, Benefit claimant rates, Housing affordability	114
<b>Health, wellbeing and happiness</b>	Health statistics, Participation in sports, Satisfaction and happiness measures	74
<b>Resilience and sustainability</b>	Air quality and pollution rates, Recycling rates, Energy consumption, Use of previously developed land, Housing statistics	1
<b>Community, trust and belonging</b>	Community assets identified, Crime rates, Voter turnout, Diversity	69

8. Latest figures, which run up to the end of quarter two, show Wiltshire's employment rate is largely stable having risen 1% point in the last quarter to September 2016. The working age population has also increased but at a slower rate. Wiltshire's Employment rate remains above that of the country as a whole.



Employment rate is not simply the reverse of unemployment. Instead employment rate shows the extent to which the potentially available workforce is being used. There are a number of groups, such as those in further and higher education or those who are caring for dependents, who don't count as employed in this measure in addition to those who do not need to work and choose not to do so.

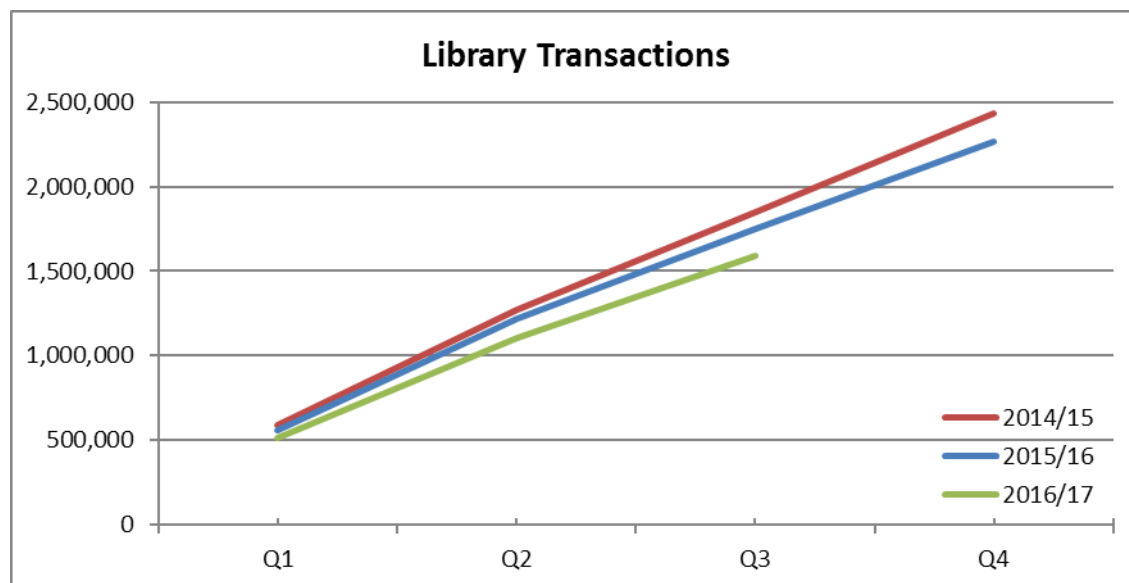
9. During quarter three the new European Structural and Investment Fund (ESIF) funded project in support of Small and Medium Enterprises began. This project will report at the end of the financial year. Quarter four will also see a number of business engagement events including [Women in Business](#), the [Growth Hub](#) and the Army Jobs Fair at Tidworth
10. Almost 100 additional affordable homes were completed in Wiltshire during quarter three. This brings the total for the last nine months to just under 300 which is similar to the same period last year.
11. The introduction of Universal Credit has resulted in a change in the way that benefit claimant statistics are measured nationally. The Claimant Count now includes Universal Credit claimants who are not in work, replacing the previous measure based on Jobseeker's Allowance claimants only. This is the second quarter in which the claimant count has been reported.
12. At the end of quarter three the claimant count in Wiltshire remained at 0.9%. At this level the Wiltshire figure remains well below the national average.



Outcome 2: people working together to solve problems and participate in decisions

13. In the nine months to December 2016 over £571,000 of grants were distributed by Wiltshire's Area Boards. This money supported over 620 separate projects varying in focus and scale. All of the projects supported through Wiltshire's Area Boards are listed [on the council's website](#).
14. Area Boards use the [Our Community Matters \(OCM\)](#) platform to engage and communicate with local residents. This consists of 18 individual community blogsites featuring events, news, jobs and comments and each week a local mailing is generated from the content posted and sent to the community area network - subscribers who have signed up to receive the news service. Each blogsite is supported by a specific Twitter account. Subscribers to the OCM platform remain fairly static but a popup subscription window will be added in the near future which should increase subscriptions.
15. Wiltshire Council's Twitter account ([@WiltsCouncil](#)) continues to grow by about 1,000 followers per quarter. The total at the end of quarter three was nearly 15,000.
16. A key to building stronger communities is enabling constructive and productive volunteering. Wiltshire Council provides a number of volunteering opportunities and encourages others to make use of volunteers. In quarter three nearly 500 volunteer hours were used in maintaining Wiltshire's rights of way – this is lower than in the previous quarter but the work is seasonal. Additionally, just over 2,000 hours were given by volunteers to help maintain countryside sites by clearing, tree planting and care, litter picking, maintenance of furniture and fences. As expected this is also lower than the previous quarter due to the seasonal nature of the work.

17. During quarter three Wiltshire Parish Steward scheme was officially launched. Part of Wiltshire Council's highways contract 20 Parish Stewards have been recruited and trained to carry out repairs on roads, pathways, drainage and verges in response to the demands of the communities they serve.
18. Libraries usage rates have fallen in recent years but overall remain high with nearly 1.3 million visits during the first nine months of this financial year. Library transactions (loans, renewals and computer sessions) are down 7% between quarter three this year and quarter three last year. However, the total number of visitors increased by nearly 5,000 in the same period suggesting that there is a range of other activities attracting visitors to Wiltshire's libraries.

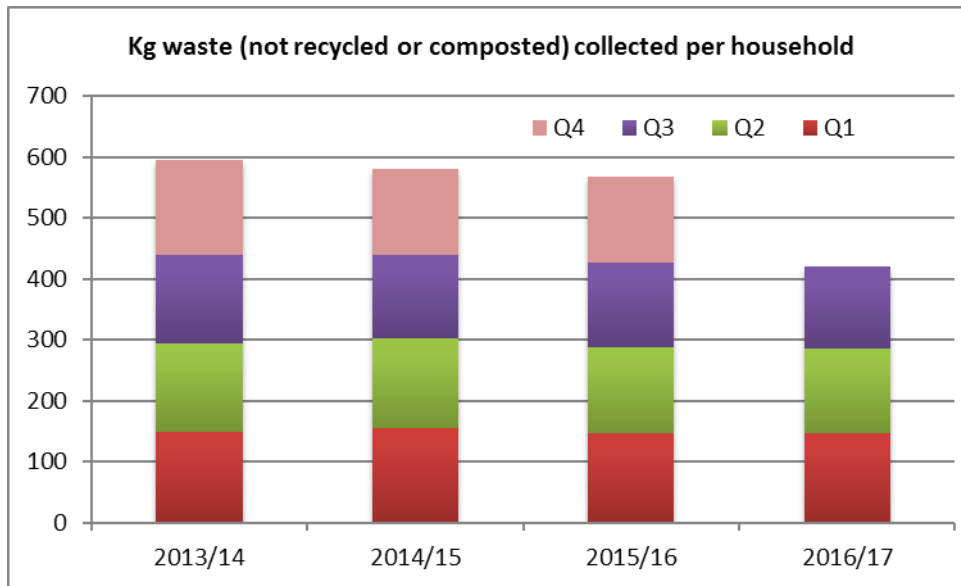


19. Neighbourhood planning enables communities to have much greater control over how their area is developed. The total number of Wiltshire parish areas now covered by a Neighbourhood Plan designation (the right to develop a Neighbourhood Plan for a set area) is 63. This is a quarter of parishes in Wiltshire.
20. The Wiltshire Assembly of Youth's (WAY) involvement in the national Make Your Mark campaign saw nearly 9,000 votes cast locally in the UK youth parliament elections. Members of the WAY also spent a day at the House of Commons during quarter three at which issues raised in the campaign were discussed.

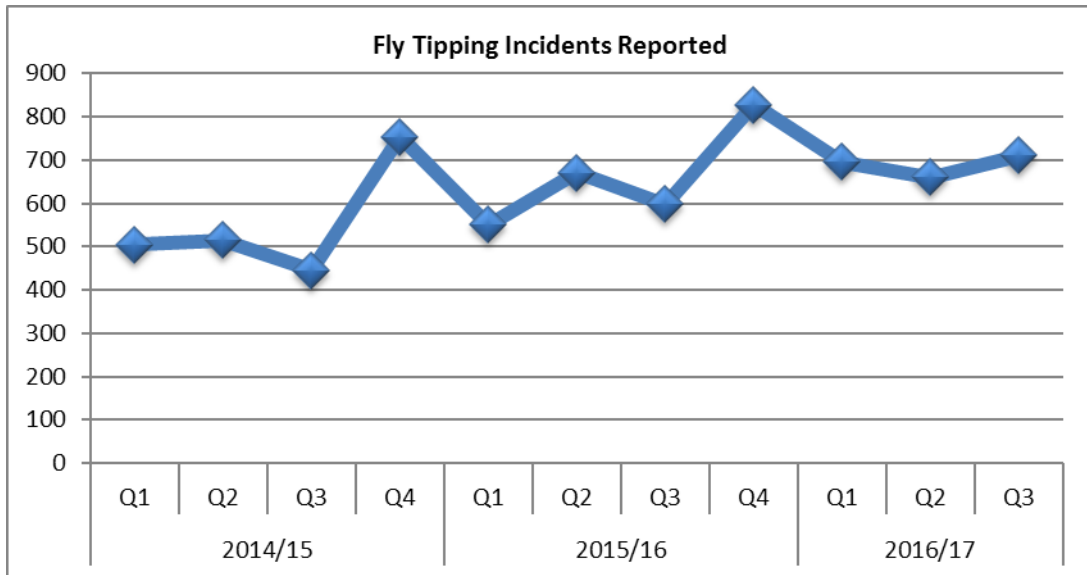
Outcome 3: living in a high quality environment

21. Applying Planning policy and determining planning applications is a significant task for Wiltshire Council. The council's decisions were upheld in 68% of planning appeal decisions made by the planning inspector during quarter three. This is an improvement on the previous quarter of 9% points. Just 13 appeals were upheld which is the same number as in the previous quarter.

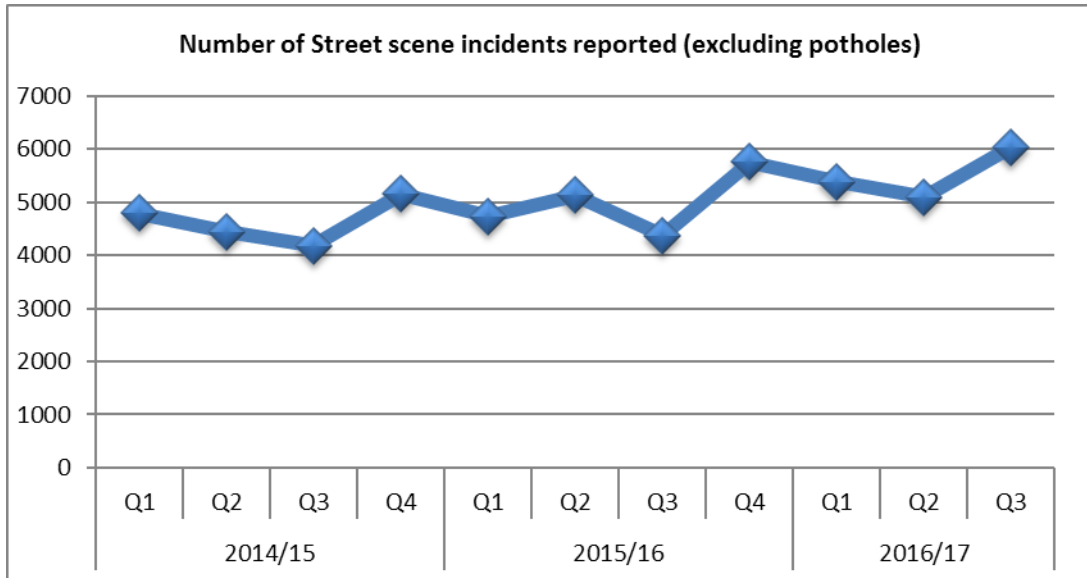
22. In 2015 a programme of council house building across Wiltshire was approved by the council. The plan will deliver new affordable council homes including homes specifically for older people and adapted homes for people with additional needs. Work has already begun on three sites which will deliver over 50 homes
23. There has been a further decrease in the amount of residual waste (waste collected and not recycled) per household in Wiltshire over the last quarter. The level for quarter three 2016/17 is a 1.1 % reduction on the same period in the previous year and a similar reduction was seen in the previous quarter. There has been an overall reduction in the waste collected on behalf of Wiltshire Council of 2% in the last 12 months.



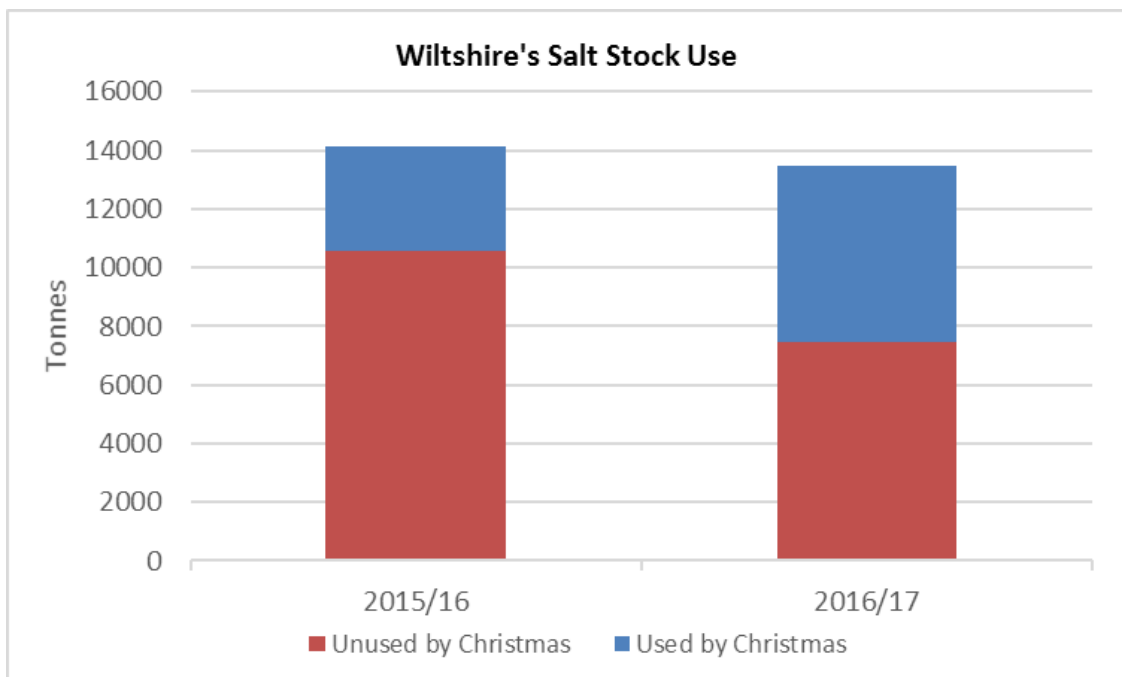
24. At just over 79% the proportion of waste diverted from landfill (i.e. local authority collected household and commercial waste, and waste from household recycling centres) remains above the target of 75% and has seen a small 0.3% point improvement on the same period last year.
25. In September 2016, the council introduced a permit scheme for Wiltshire residents wishing to use their van or large trailer to access the household recycling centres (HRCs). Quarter 3 shows an 11.35% decrease in the amount of certain key materials typically disposed of at the HRCs (residual waste, garden waste, wood waste, and soil/rubble) over the same quarter in 2015/16. This has contributed to savings in waste handling charges.
26. The number of fly-tipping incidents reported during quarter three was just over 700 which represents an increase on both the previous quarter and the same period in the previous year. The increase in reports is contributed to by the increased ease of reporting from the public via the online My Wiltshire App, enabling early investigation.



27. In January 2017 the Enforcement Team within Waste and Environment successfully prosecuted a serial fly-tipper in the south of the county. The offender pleaded guilty to eight counts of fly-tipping and he was sentenced to three months imprisonment. In addition, the team issued eight fly-tipping fixed penalty notices (£400 each) during January 2017.
28. The rate of dry recycling and composting has fallen in quarter three. The 1.6% point fall to just over 45% reflects the expected seasonal trend due to lower volumes of garden waste collected for composting in this quarter. It is also the case that there is a continuing reduction in the tonnage of newsprint recycled due to changing consumer habits. Wiltshire Council aims to meet the national waste strategy target of 50% recycling and composting rate by 2020.
29. Quarter three saw a record number of street scene and highways issues (excluding potholes) reported. At just over 6,000 the number is 19% above last quarter and 38% above the same period last year and includes more than 5,800 unique issues. Greater reporting is to be welcomed and does not necessarily mean that Wiltshire roads are in a worse state just that the council is being made aware of the issues. The majority of issues are reported through the [MyWiltshire](#) service either online or via the mobile app.

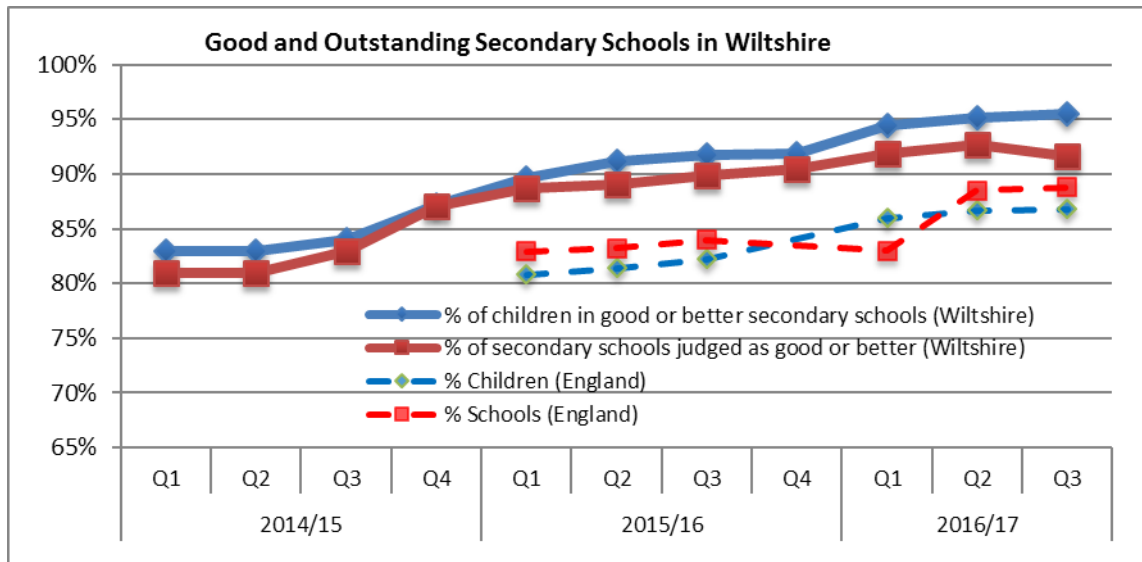


30. At the start of the winter season Wiltshire Council had prepared for the possibility of adverse weather affecting the road network. All 24 gritting vehicles had been serviced and the council had 13,500 tonnes of salt in stock and stored strategically across the county. Just over 6,000 tonnes of that was used before Christmas which was an increase on the previous year.



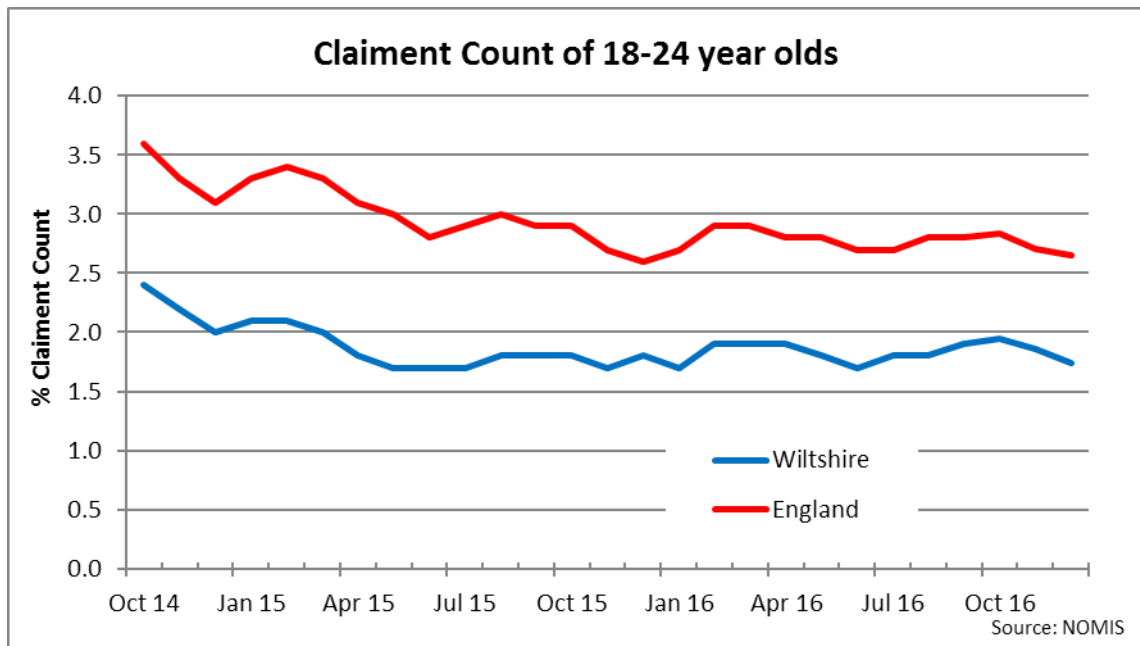
**Outcome 4: inclusive communities where everyone can achieve their potential**

31. The proportion of pupils in Wiltshire who attended secondary schools rated as good or outstanding by OfStEd has increased again this quarter to 95.5%.



32. New tests were undertaken by primary school pupils during 2016 and the results released last quarter. These new reading, writing and maths tests don't prescribe levels to children's performance but show whether they have reached the expected standard. More than half of Wiltshire's primary school children reached the expected standard in all three subjects. This puts Wiltshire on a par with the national average but above the regional average.
33. The second phase of Wiltshire Council's Troubled Families Programme is underway. Phase one ended in March 2015. The programme requires cooperation across public agencies to 'turn around' the lives of the most troubled families. In phase two families were eligible if they met a number of the following criteria: involved in crime or anti-social behaviour, had children not attending school, were at risk of financial exclusion, affected by domestic violence or with a range of health problems. At the end of quarter three more than 200 families had been 'turned around' since the start of phase two 12 months earlier. Wiltshire is currently working with nearly 500 families and expect to engage another 500 later this year. In the five years of the programme Wiltshire is expected to engage with nearly 2,000 troubled families
34. As with the corresponding adult measure the proportion of young people in receipt of Job Seekers Allowance has changed to a Claimant Count for 18 to 24 year olds. Wiltshire performs better than the national average with a stable figure below 2% (1% point below the national average). There was a small decrease in the numbers between quarter two and quarter three which represented fewer than 50 individuals.

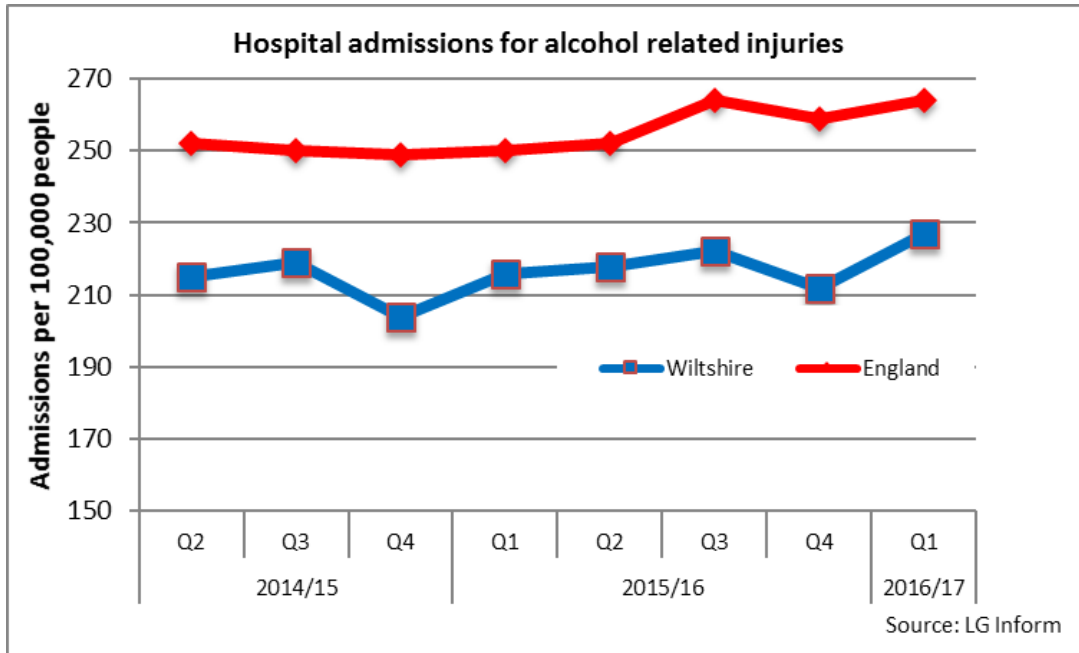




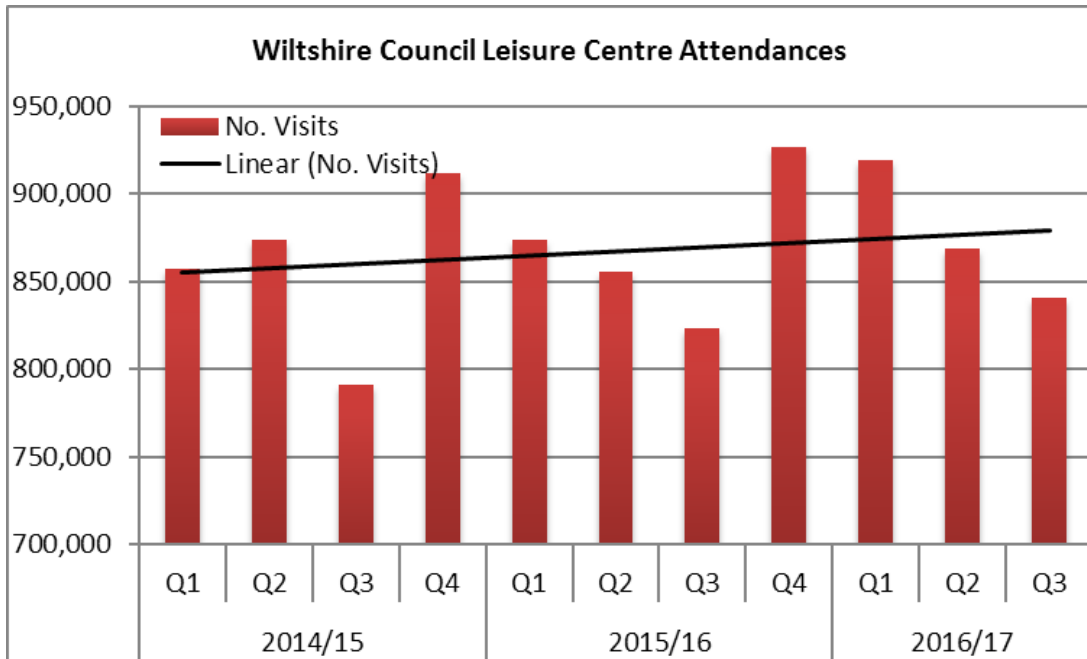
35. Provisional figures from the Skills Funding Agency show that Wiltshire has had a 20% increase in the in the number of apprenticeships. Over 6,400 people signed up for apprenticeship schemes in the year to September 2016 which was above the target of 5,600. These figures make Wiltshire the local authority area with the second fastest growth in apprenticeship numbers the country.
36. At the end of quarter three just over 250 16 and 17 year olds in Wiltshire were known not to be in education, employment or training (NEET). This is just 2.5% of all Wiltshire 16 and 17 year olds which is below both the regional figure of 2.8% and the England figure of 2.7%

Outcome 5: healthy, active and high quality lives

37. During quarter three just over 3,000 people in Wiltshire were invited for, and took the opportunity of, an NHS Health Check. The take up rate was 52% which is an improvement on the position in the same period last year. NHS health checks are offered to everyone over the age of 40 and help prevent the devastating effects of heart disease, diabetes, kidney disease and strokes.
38. During quarter three Wiltshire Council supported Alcohol Awareness Week which is run by Alcohol Concern. The council operates an Alcohol Strategy with its partners that aims to raise awareness, reduce alcohol related harm, support treatment and keep Wiltshire communities safe.
39. In 2015 Wiltshire Substance Misuse Service, had more than 650 alcohol related clients and helped two thirds of them to complete treatment successfully. The graph below shows how hospital admissions for alcohol related injuries are lower in Wiltshire than in England.



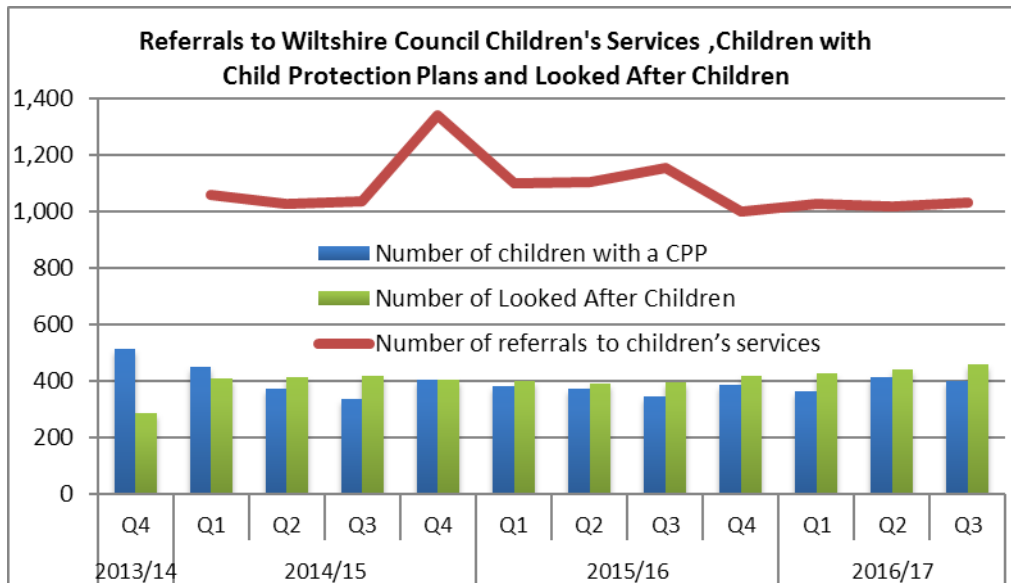
40. Wiltshire Council's Adult Care Services provide a range of social care services to older people and people with a learning disability or physical impairment. Services are delivered to people who need a rapid response to a crisis, need help to maintain their independence where they have complex needs and to promote preventative services which help people remain well and independent. In the first nine months of the current financial year over 13,200 individuals received support of some kind from Wiltshire Council's Adult Care Services. This is on a par with the previous year.
41. Help to live at Home is designed to help people who are frail, sick or disabled live at home for as long as it is safe and it helps people to continue to look after themselves in their own home. Help to live at Home supports self-funders as well as those eligible for council-funded support. The care providers supporting Help to live at Home are motivated to deliver on people's individual support plans and outcomes, not just providing the care. The number of people with a help to live at home care package remained fairly static in quarter three at over 700.
42. In the course of supporting vulnerable adults Wiltshire Council's Adult Care Services supported nearly 1,300 carers during the last six months.
43. It is widely recognised that staying active is an essential part of being healthy and Wiltshire Council's leisure services have an essential role to play in improving local health and wellbeing. Visits to leisure centres are seasonal and a lower number is usually expected in the third quarter of the year. Despite this there were 2.2% more visits in quarter three this year than in the same period last year. In total, there were nearly 77,000 more attendances in the nine months to December in 2016 than in the same period in 2015.



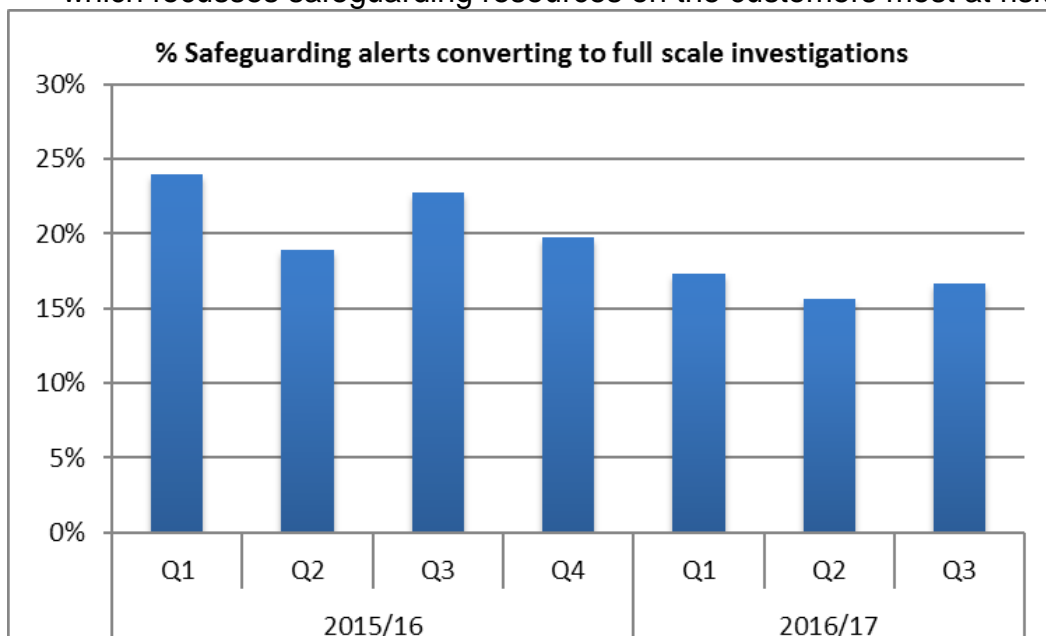
44. During quarter three there was a celebration for the 16 Wiltshire Schools that had completed the Wiltshire Healthy Schools programme. The programme recognises schools that have provide education and prevention to improve health of their children. 47 Wiltshire Schools currently have a bronze, silver of gold award and 105 are working towards an award. More are expected to join during 2017.

Outcome 6: protected from harm and feel safe

45. There were fewer referrals to Children's social care in quarter three of 2016/17 than in the same period in the previous year. At just over 1,000 the number was 10.8% down on quarter three 2015/16.
46. The number of children with a Child Protection Plan has seen an increase. At just over 400 there has been a 15.9% increase on the same period in the last year.
47. The overall number of looked after children, however, has seen an increase of 16.0% on the same period last year and of 4.1% on the previous quarter.

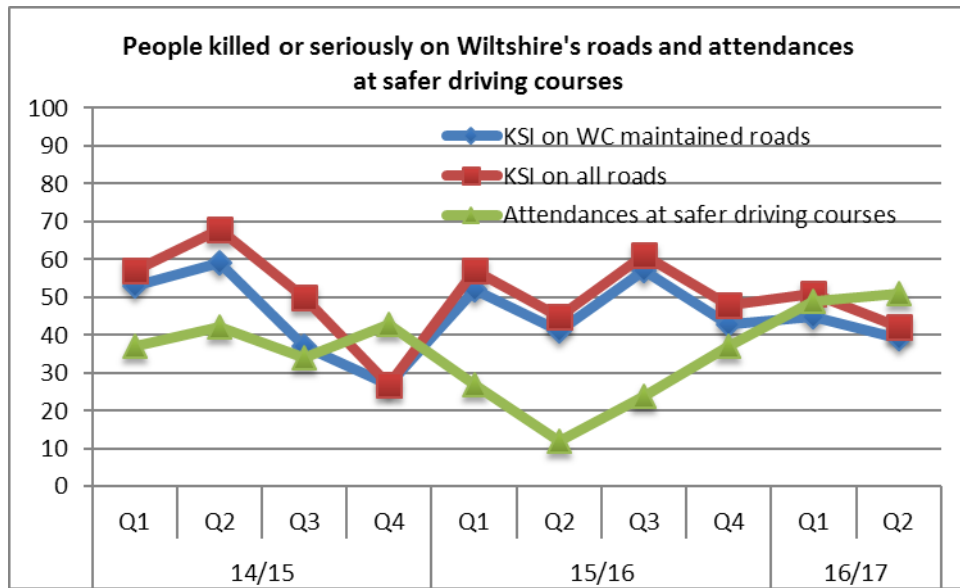


48. The rate of adult safeguarding alerts that develop into full scale investigations continues its decline and at the end of this this quarter it was just under 17%. Council staff are able to screen out alerts that do not meet the criteria for a safeguarding investigation in line with the changes brought in by the Care Act which requires all safeguarding enquiries to be outcome focused and a proportionate response to the likelihood of harm. Alerts that do not meet these criteria are signposted to the most appropriate teams or partner agencies who then work to reduce any future risks. Only the appropriate alerts follow the safeguarding process which focusses safeguarding resources on the customers most at risk.

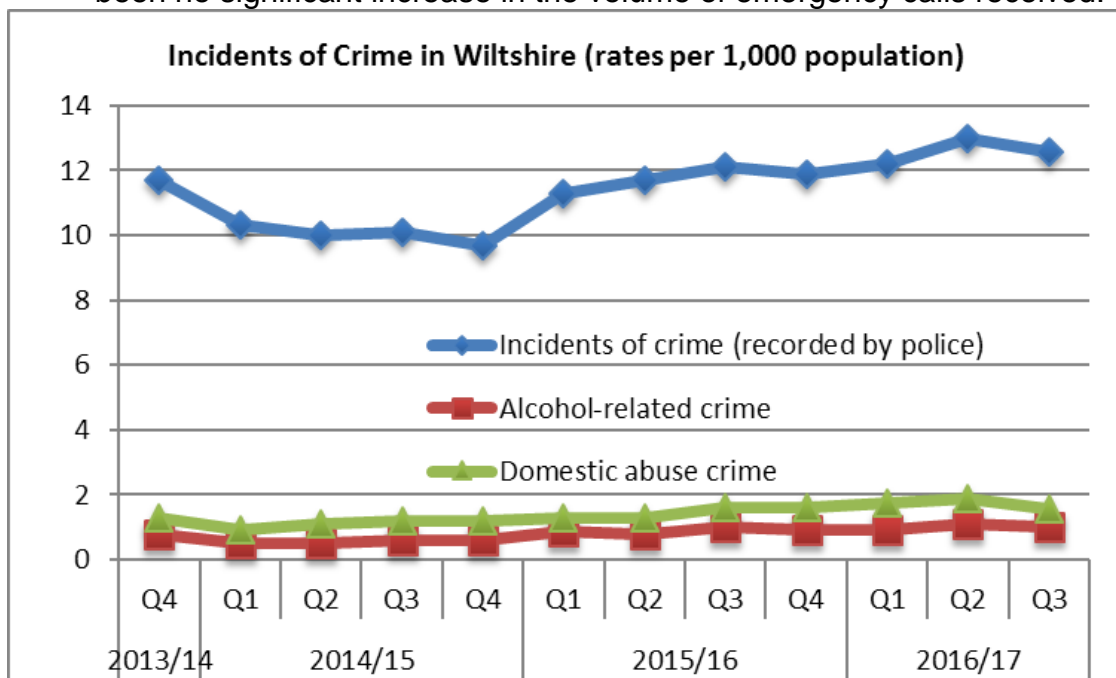


49. The latest figures for road safety relate to quarter two of this year (July – September 2016) and show that there is a positive reduction in both key measures on the position for the same period in the previous year. The number of fatal or serious collision on Wiltshire maintained roads reduced

by 4.9%. The number of people killed or seriously injured on the roads in Wiltshire fell by 6.7%



50. Recorded crime rates have increased slightly in Wiltshire over the last year but show a slight reduction in each of the three measures used in the last quarter. It is expected that this represents natural fluctuations. The police report that, at least in part, this increase is due to improvements in recording practices. They have also said that there has been no significant increase in the volume of emergency calls received.



Our Principles – the way we work

51. Wiltshire Council is currently rated as the best council to work for in the UK by Glassdoor. Glassdoor is the fastest growing jobs and recruiting site and holds a growing database of more than 8 million company reviews. Unlike other jobs sites, all of this information is entirely shared by those who

know best — the employees. Glassdoor allows anyone to see what it's really like to work somewhere according to employees.

52. The council was the first local authority to partner with Glassdoor and this has enabled us to articulate our employer brand through our Glassdoor profile and engage with current and ex- employees who provide feedback about what it's like to work for the council. As the first local authority to take this step in platforming the feedback of our workforce this was a risk, but this risk has paid off and is now an effective part of our employer brand, and has created transparency and open dialogue current and ex-employees as well as those who may be considering a role with the council, which in turn promotes effective staff engagement.
53. Our Glassdoor profile includes a range of positive feedback, with a current average rating of 4.3 stars out of 5. This rating is based on a number of different factors evaluated through employee reviews, with flexible working scoring most highly. The ratings change regularly based on new feedback but with the current rating of 4.3 this not only places us as the best council it also compares favourably when it comes to comparisons with other public sector organisations, including local hospitals, universities and colleges, and also national public sector bodies including Public Health England with a rating of 2.9 and the Ministry of Defence with a rating of 3.4. In addition we have performed better than some big private sector organisations in the region, including Dyson, with a rating of 3.2 and Honda, Swindon, who have a score of 3.5.

### **Strategic Risk Register**

54. Delivering the Council's Business Plan remains a significant challenge given an increasing demand for key services, such as care for vulnerable children and adults, waste management and highways maintenance, as well as rising inflation costs, and smaller central government grants. The Strategic Risk Register reflects these challenges.
55. The Strategic Risk Register draws together information reordered on risk registers at service delivery level. Each Directorate area holds at least one Service Risk Register.
56. Information that has significance across the council as a whole is displayed in three categories on the Strategic Risk Register.
  - *Critical service risks*: significant single service risks, which, should they be realised will have a significant impact on the organisation as a whole.
  - *Composite strategic risks*: risks which are significant within a number of service areas although individually would not significantly impact on the organisation as a whole. These risks are compiled into a single strategic composite risk (owned by the most appropriate service) and included within the strategic risk register. The ongoing monitoring of these risks therefore is drawn from the updates to the individual service level risks.
  - *National risks*: These risks mirror the most significant risks on the Cabinet Office's [national risk register](#) and is Wiltshire's response

should these be realised. These are typically captured within the [Wiltshire Community Risk Register](#) managed by the [Local Resilience Forum](#).

57. The simplified version of the current strategic risk register is provided in appendix 1.
58. Each risk is fully defined by the responsible service (who assess the cause, event and effect that make up the identified risk) and scored for impact and likelihood to give an overall score. A risk is scored twice; firstly, as inherent (the current level of risk) and then as residual (the risk as it would be once all mitigating actions are in place). The actions described are RAG'd based on progress towards completion. This RAG guides the reader of the register to understand the true current risk.
59. A whole range of service risks are kept under observation each quarter. There were three newly defined risks in quarter three that were considered when corporate composite risks were scored.
60. There are no new risks on the strategic register and none have been removed since the last quarter.
61. Of the 13 risks listed on the strategic risk register just four have an inherent score that puts them in the 'high' bracket.
62. A pandemic flu outbreak or widespread flooding remain a risk to both local life and to service provision. However, the Council has effective business continuity plans and resilient staff structures in place to respond to any incidents. The way these risks are scored on the register reflects the scale of the impact should either an outbreak of extreme flooding occur and the lack of control the organisation has on avoiding these national high level risks.
63. The composite Budget Management risk remains at the same high inherent level as in the previous quarter. There are, however, tighter controls in place including controlling recruitment, cutting the number of authorised signatories for spending decisions and limiting the number of credit cards available which reduces the likelihood of the risk becoming an issue. There remains continued pressure on budgets across Wiltshire Council. This is a common risk across local authorities as the demands on essential services continue to increase and the funding from central government decreases.
64. Other national level risks have medium inherent and residual scores and suggest good progress against planned actions.
65. The controls in place to manage Cyber Security mean that the risk is rated as low.
66. Alongside Wiltshire's Integrated Emergency Plan, which allows the council and its partners to protect people more effectively should a major incident occur other ongoing controls for national level risks include:
  - A 'Deliberate Threats' Plan being produced in conjunction with the Wiltshire Police Counter Terrorism Adviser
  - Continuous monitoring of air quality.
  - Winter preparedness plan in place
  - Close liaison with power supply companies.

67. The risk around safeguarding of children and young people remains a high inherent risk. There is progress against planned mitigation actions including the start of an innovation bid to keep young people out of the care system and senior management resource available to support the care Market Development Plan. However, the Council is not able to predict the volume of looked after children which include unaccompanied asylum seekers, and therefore further control is not possible and the risk remains high.
68. Safeguarding of vulnerable adults remains a high priority for the Council. This focus means that actions continue to be sought and undertaken, to mitigate the likelihood of safeguarding incidents. However, the unpredictability of the sources of such events means that safeguarding will always be a risk to the organisation.

### **Overview & Scrutiny Engagement**

69. Financial Planning Task Group normally receives each quarterly performance report. However, due to the budget setting cycle the task group met prior to this report being produced and has therefore not scrutinised it

### **Safeguarding Implications**

70. A number of indicators are regularly analysed which directly relate to the safeguarding of children and adults. Action is taken where improvements in performance are required.

### **Public Health Implications**

71. Not applicable as no decision is required.

### **Procurement Implications**

72. Not applicable as no decision is required.

### **Environmental and Climate Change Considerations**

73. Not applicable as no decision is required.

### **Equalities Impact of the Proposal**

74. Not applicable as no decision is required.

### **Risk Assessment**

75. Not applicable as no decision is required.



## **Financial Implications**

76. Not applicable as no decision is required.

## **Legal Implications**

77. Not applicable as no decision is required.

## **Options Considered**

78. Not applicable as no decision is required.

## **Conclusions**

79. This report brings together updates on outturns published through the Citizen's Dashboard, as well supplementary commentary to provide further context around the council's activities in these areas and the risks faced by the council.

**Robin Townsend**

**Associate Director, Corporate Support, Procurement & Programme Office**

---

*Report Author:*

Toby Eliot, Corporate Support Manager | [tooby.eliot@wiltshire.gov.uk](mailto:tooby.eliot@wiltshire.gov.uk)

February 2017

## **Appendices**

- Appendix 1: Strategic Risk Register (Q3 December 2016)
-

This page is intentionally left blank

## Wiltshire Council Strategic Risk Register 2016/17 Quarter Three

Risk short name	Primary Risk Category	Secondary Risk Category	Q3 Inherent Impact	Q3 Inherent Likelihood	Q3 Inherent Risk Rating	Q3 DoT	Q3 Actions RAG	Q3 Residual Impact	Q3 Residual Likelihood	Q3 Res Risk Rating	Q3 Comments
<b>Critical Service Risks</b>											
Safeguarding Children	Service Disruption	Reputation	4	3	12	▶	Red	4	2	8	There is progress against the mitigating action: work has begun on new programme to keep young people out of care, here is now senior management capacity to progress the Market Development Plan for care places. However, increase in the number of looked after children, including unaccompanied asylum seeker children, is not within the control of the council.
Safeguarding Adults	Reputation	Service Disruption	4	2	8	▶	Green	4	1	4	All actions are on track and the risk remains monitored and managed.
<b>Composite Corporate Risks</b>											
Staff capacity: Recruitment and Retention	Staffing/ People		3	2	6	▶	Green	3	2	6	A Corporate Workforce Action Plan is in place and delivering the Council's People Strategy.
Budget management	Financial	Reputation	4	3	12	▶	Amber	4	2	8	Continued pressure on budget but robust managerial actions have been put in place lead senior staff to mitigate cost pressures in the current financial year. Examples of actions taken include new processes on staff recruitment, cutting numbers of authorise signatories and decreasing numbers of credit card holders.
Contract monitoring and management	Service delivery	Financial	3	3	9	▶	Green	3	3	9	New contract management approach and framework have been developed and are in the process of being adopted.
Corporate Health, Safety & Wellbeing	Health & Safety		3	2	6	▶	Green	2	2	4	All mitigating actions are progressing. These include the development of policies for dealing with challenging behaviour.
Information Governance	Reputation	Finance	3	2	6	▼	Amber	2	2	4	Action plan progressing well with a significant number of actions completed this quarter. Policies on Intranet and underpinning guidance being written and published.

## Wiltshire Council Strategic Risk Register 2016/17 Quarter Three

Risk short name	Primary Risk Category	Secondary Risk Category	Q3 Inherent Impact	Q3 Inherent Likelihood	Q3 Inherent Risk Rating	Q3 DoT	Q3 Actions RAG	Q3 Residual Impact	Q3 Residual Likelihood	Q3 Res Risk Rating	Q3 Comments
<b>National Level Risks</b>											
Pandemic influenza	Health & Safety		4	3	12	▶	Green	4	3	12	All local planning is up-to-date. Work is on-going with a number of partners (including Police, Power suppliers, Local Resilience Forum) to ensure that mitigating actions remain effective.
Flooding	Health & Safety		4	3	12	▶	Green	4	3	12	
Widespread electricity failure	Health & Safety		4	2	8	▶	Green	4	2	8	
Catastrophic terrorist attacks	Health & Safety		4	2	8	▶	Green	4	2	8	
Poor air quality events	Health & Safety		4	2	8	▶	Green	4	2	8	
Cyber Security	Legal	Reputation	4	1	4	▶	Green	4	1	4	Work is ongoing in order maintain defences and understand new threats. The risk is managed

**Wiltshire Council**

**Cabinet**

**14 March 2017**

---

**Subject:** Wiltshire Council 2016 staff survey outcomes

**Cabinet Member:** Cllr Stuart Wheeler - Hubs, Heritage & Arts, Governance (including information management), Support Services (HR, Legal, ICT, Business Services, Democratic Services)

**Key Decision:** No

---

## **Executive Summary**

The 2016 staff survey was conducted between Monday 21 November and Friday 23 December 2016. This survey is a bi-annual assessment of staff views of working for Wiltshire Council.

The results of the 2016 survey continue the positive trend seen in the previous survey results in 2014. The staff engagement index score has further increased and there has been a continued rise in the number of fully engaged employees, compared to 2014.

Four clear corporate priorities for 2017-18 have been identified, with the aim further increasing staff engagement:

- Learning and development opportunities;
- Resources;
- Visibility of senior management;
- Improvements to communication.

Completion of effective appraisals will also remain as a corporate priority from the 2014 survey, allowing us to continue building on the improved results already achieved.

## **Proposal**

Cabinet to note the content of the corporate staff survey report and priorities arising.

## **Reason for Proposal**

Cabinet have requested to be kept updated regarding staff survey outcomes and trends, particularly regarding staff engagement, recognising that the ability to deliver business plan outcomes relies on having an engaged workforce.

**Dr Carlton Brand, Corporate Director**

## Wiltshire Council

### Cabinet

14 March 2017

---

**Subject:** Wiltshire Council 2016 staff survey outcomes

**Cabinet Member:** Cllr Stuart Wheeler - Hubs, Heritage & Arts, Governance (including information management), Support Services (HR, Legal, ICT, Business Services, Democratic Services)

**Key Decision:** No

---

#### Purpose of Report

1. To provide Cabinet with an overview of the 2016 staff survey results, highlighting key messages and priorities arising.

#### Relevance to the Council's Business Plan

2. The staff survey is a key way in which we measure staff engagement. An engaged workforce is important to the council's ability to deliver our people strategy and business plan outcomes. Responding to the staff survey helps to ensure the council delivers principles 7 and 8 in the Business Plan – to grow outstanding leaders and managers and allow staff to be innovative with a 'can-do' approach.

#### Background

3. The 2016 staff survey window originally ran from Monday 21 November to Friday 9 December 2016; it was subsequently reopened with final online responses being accepted up to 5pm on Friday 16 December and paper copies accepted up to Friday 23 December 2016.
4. 65.7% of staff (2,898 respondents) responded to the survey, up from 60% in 2014. This represents a very good response rate for an organisation of this size and is also in line with the Local Government benchmark.
5. Survey responses have been analysed and an overall corporate report was communicated to staff, managers and members on 9 February 2017. Individual reports for services were issued to services in early March 2017.

#### Main Considerations for the Council

6. Overall, the 2016 survey results continue the positive trend seen between the 2012 and 2014 surveys.
7. The Council's employee index score has increased for a second consecutive survey to 58%.

8. There has been a continuation of the rise in the number of fully engaged employees (31.7% of respondents, up from 29.5% in 2014).
9. The number of fully disengaged employees has also fallen for a second time (1.2% of respondents, down from 2.1% in 2014).
10. Four clear corporate priorities for 2017-18 have been identified, with the aim of further increasing staff engagement:
  - Learning and development opportunities;
  - Resources;
  - Visibility of senior management;
  - Improvements to communication.
11. Completion of effective appraisals will also remain as a corporate priority from the 2014 survey, allowing us to continue building on the improved results already achieved
12. Strongly embedded behaviours framework - 96% of staff stating they understand the behaviours that are expected of them and only around 1% (18 staff) giving a negative response.
13. 73% of staff felt the council had a community-focused culture. This result continues to reflect the Council's vision to create stronger and more resilient communities.
14. Staff Survey results were assessed against the 2017-21 people strategy themes of empowerment, innovation and collaboration. 72% of respondents felt empowered in their roles, with 71% also indicating that their role, team or service demonstrates positive collaboration.
15. Exceeding local government benchmarks in the areas of Change, Culture, Wellbeing and Safety, and Reward and Recognition based on ORC local government benchmark.
16. The full corporate results can be found at Appendix A - 2016 staff survey results report for staff and members.

### **Overview and Scrutiny Engagement**

17. None Required.

### **Safeguarding Implications**

18. None.

### **Public Health Implications**

19. None.

### **Procurement Implications**

20. None.

**Equalities Impact of the Proposal** (detailing conclusions identified from Equality Analysis, sections 4 and 5)

21. None.

**Environmental and Climate Change Considerations**

22. None.

**Risks that may arise if the proposed decision and related work is not taken**

23. No decision required.

**Risks that may arise if the proposed decision is taken and actions that will be taken to manage these risks**

24. No decision required.

**Financial Implications**

25. None.

**Legal Implications**

26. None.

**Options Considered**

27. Not applicable.

**Conclusions**

28. That Cabinet note this report.

**Barry Pirie (Associate Director, People and Business)**

---

Report Author: Stuart Honeyball, Applications Support Manager,  
[stuart.honeyball@wiltshire.gov.uk](mailto:stuart.honeyball@wiltshire.gov.uk),

Date of report 22 February 2017

**Appendices**

Appendix A - 2016 staff survey results report for staff and members.

**Background Papers**

The following documents have been relied on in the preparation of this report:  
None.



# Wiltshire Council Staff Survey 2016



## Corporate Results Report to staff and members

# Survey highlights

The survey was carried out in November and December 2016, with staff given the option to respond by either electronic or paper surveys. **Some of the highlights** are shown below:



**65.7%**

Overall council response rate

★ (up 5.7% from 2014)



**2898**  
responses

Engagement Index scores:

Wiltshire Council overall

**58%**

★ (up 2% from 2014)

Council top performers\* 

\*Services receiving 10 or more responses

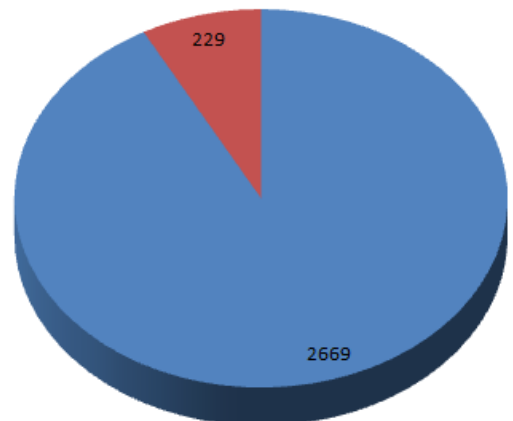
Adult Care Specialist Commissioning

**85%**

Employment and Skills

**85%**

How staff responded:



■ Electronic

■ Paper

Fully engaged



**31.7%**

917 staff  
(up 2.2% from 2014)★

Wiltshire Council

Fully disengaged



**1.2%**

36 staff  
(reduced 0.9% from 2014)★

## Introduction - a message from the Corporate Directors

Thank you to all of you who took the time to respond to the 2016 staff survey, especially those who provided comments in their responses. The feedback you gave us through this survey is an important tool in reflecting on how the last two years has affected or influenced your experiences. It helps us highlight where we continue to perform well, as well as develop action plans to address areas of concern.

### 2016 Survey headline results:

- ✓ Employee **Engagement Index increased** to 58% (from 56% in 2014)
- ✓ **Fully engaged staff increased** to 31.7% (from 29.5% in 2014)
- ✓ **Fully disengaged staff reduced** to 1.2% (from 2.1% in 2014)
- ✓ Staff survey **response rate increased** to 65.7% (from 60% in 2014)
- ✓ Appraisal **completion rates increased** to 59% (from 55% in 2014)

Given the demands placed upon the council during the last two years, including ongoing austerity and budget reductions, these results are a real demonstration of our resilience, adaptability and creativity.

It is vital, however, that we do not just focus on the positives; we must also take this opportunity to continue improving ourselves and our services. We want to really listen to what it is like to work at Wiltshire Council right now.

Your responses and comments, along with your feedback from the staff engagement forums in December 2016, have helped us identify four corporate priorities for development:

- **Learning and development opportunities** – We will review our learning and development offer and help you to develop “your career as your asset”.
- **Resources** - We recognise that you are less satisfied than in 2014 with the resources available to effectively undertake your roles. Resources can mean many things to different people - your management teams will be talking to you about this to find out more.
- **Visibility of senior management** – Through the #EPIC staff engagement group, we will actively seek your views about what this really means to you, and find out how you think we should better engage with you.
- **Communication** – We will focus on providing clear information within an honest, open and transparent culture, and identify new opportunities for you to share knowledge and expertise with each other.

We will also continue to promote appraisals and objective setting (introduced as a result of your feedback from the 2014 survey) across all teams. These discussions are key to helping you understand the role you have in delivering our business plan.

Working together towards these priorities will support the Council in developing a culture where staff are empowered, innovation is encouraged and collaboration becomes second nature - we look forward to achieving this with you.

**Carlton and Carolyn – Corporate Directors**

# Staff survey 2016 results

This report summarises the 2016 staff survey results against the contexts of the six themes of the previous People Strategy and a “first pass” assessment against the three pillars of the proposed new 2017–21 People Strategy. It is divided into two parts:

- ✓ This first section summarises the results from the survey and details the key messages from the responses.
- ✓ The second section provides a full breakdown of results for each staff survey question. This can be used to highlight positive feedback and support discussions within teams about areas requiring improvement or corrective action.

## Survey key messages:

This table shows the percentage change in positive responses for each of the 10 groups of questions in the survey.

- Five of these areas saw increases in positive responses (ranging between 1 and 3 percentage points).
- Of the five remaining areas, one remained static and three saw reductions in positive responses of a similar order. The fourth area (learning and development) saw a significant reduction of 14 percentage points (57% to 43%):

Section	2016 Average % Positive Responses	2014 Average % Positive Responses	2012 Average % Positive Responses	Change in % Positive Responses (2014 to 2016)
Change	67	65	61	+2%
Your role	64	63	63	+1%
Culture, Wellbeing & Safety	80	77	73	+3%
Reward & Recognition	59	62	58	-3%
Communication*	56	58	53	-2%
Management & Leadership	53	53	50	0%
Learning & Development	43	57	52	-14%
Employee Engagement	58	56	51	+2%
Team Work	76	75	72	+1%
Customers	69	70	68	-1%

\* denotes sections which only include questions common to both 2016 and 2014 surveys

## People Strategy themes and pillars:

Some of the survey questions are designed to indicate the level of positivity in relation to our previous People Strategy themes. When analysing the results, we group these questions together under the relevant theme and use the individual scores to calculate an overall score for each theme.

These thematic scores are used to support the development of corporate priorities and service-led action planning. For the 2016 survey, there are two parts to this thematic scoring:

- ✓ To ensure a consistent baseline for comparison with previous surveys, the first table shows the positive response scores relating to the six former People Strategy (2011-15) themes.
- ✓ In order to establish a datum for how staff views are aligning with the proposed new People Strategy (2017-21) pillars of Empowerment, Innovation and Collaboration, the second graphic shows the results for both positive and negative responses for each pillar.

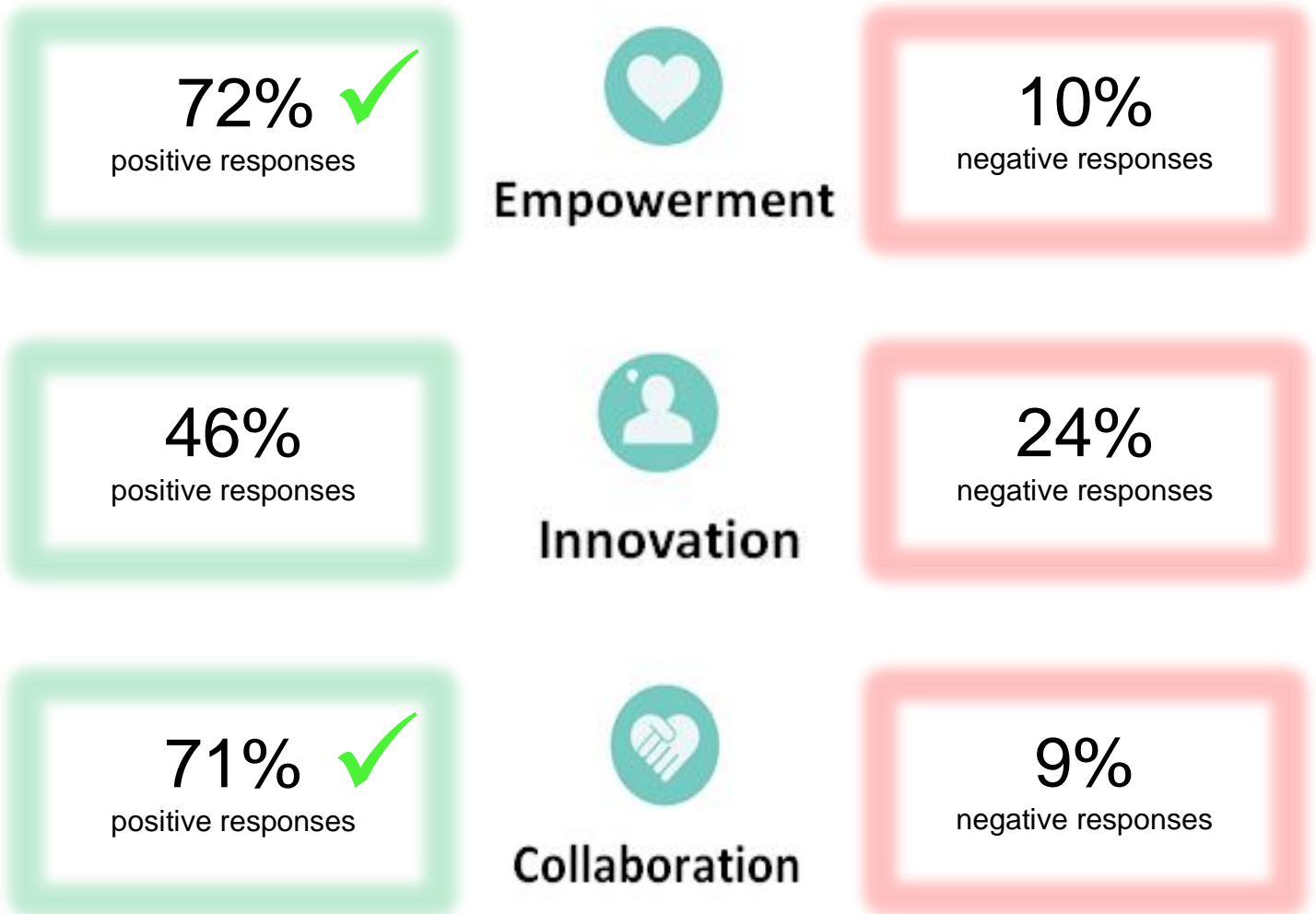
**Previous People Strategy (2011-15) six themes.**

Whilst there are minor variations in the percentages between the 2014 and 2016 surveys, the overall position at theme level is that positivity has remained at similar levels over the last two years:

Theme	2016 Average % Positive Responses	2014 Average % Positive Responses	2012 Average % Positive Responses	Change in % Positive Responses (2014 to 2016)
Community focused culture	73	74	72	-1%
Innovative Ideas	53	55	50	-2%
Proud, passionate people	53	52	45	+1%
Simple, effective systems	67	68	64	-1%
Smart workforce planning	61	61	59	0%
Strong leadership and vision	51	51	47	0%

**New People Strategy (2017-21) three pillars.**

The degree to which staff identify with the proposed new People Strategy pillars and positively recognise them within their workplaces can be assessed using their responses to specific groups of questions in the survey. The graphic below gives summary results for positive and negative responses for each of the pillars, shown as a percentage of the total number of survey respondents:



**Important Notes:**

- ✓ Detailed breakdowns of responses to the individual questions which inform both the previous People Strategy themes and the new People Strategy pillars can be found later in this report.

## Employee engagement:

As in previous years, the 2016 staff survey contained a number of questions specifically designed to indicate levels of staff “Engagement”. This table shows the percentage of scores assessed as being “positive”; the average of these is then used to give a score known as the Employee Engagement Index:

		2016 Average % Positive Responses	2014 Average % Positive Responses	2012 Average % Positive Responses
Say	43. I am proud to work for Wiltshire Council	62	62	55
	44. I would recommend Wiltshire Council as a great place to work	54	53	45
Stay	45. I feel committed to the organisation's goals	72	70	66
	46. I feel a strong sense of belonging to this organisation	50	49	43
Strive	47. Working for Wiltshire Council makes me want to do the best job I can	63	61	57
	48. Wiltshire Council motivates me to contribute more than is normally required in my work	44	43	38
<b>Employee Engagement Index</b>		<b>58</b>	56	51

The overall employee engagement index for Wiltshire Council is 58%; this is an improvement from the previous score of 56% in 2014. In addition to the increase in the overall engagement index, all six questions relating to staff engagement saw increases in the number of positive responses compared to 2014.

There was also a positive increase in the number of staff responding positively to all six of these questions (“fully engaged”). 917 staff (31.7% of respondents) indicated that they either agreed or strongly agreed; this has improved from the 2014 results of 822 staff (29.5% of respondents).

Results showed a corresponding decrease in the number of staff responding negatively to all six of these questions (“fully disengaged”). 36 staff (1.2% of respondents) indicated that they either disagreed or strongly disagreed; this is an improvement from the 2014 results of 59 staff (2.1% of respondents).

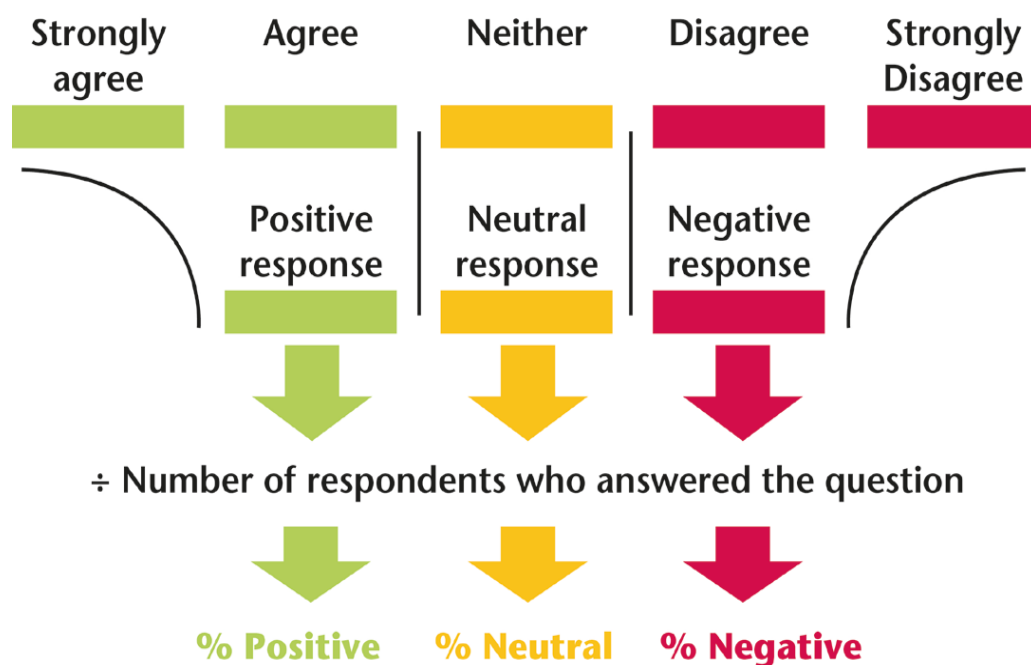
Both of these results maintain the improving trends in staff engagement seen between the 2012 and 2014 survey.

### Important Notes:

- ✓ These figures do not include casual or agency workers.
- ✓ Staff engagement figures and Index are based on responses to questions in the survey designed to indicate the level of “Engagement”; these are questions 43 to 48.
- ✓ The Engagement Index figure is based on only “positive” responses to questions 43 to 48; the average of these responses is calculated to give an employee engagement index.
- ✓ Fully engaged staff are defined as those who responded to all six of these questions with either “agree” or “strongly agree”.
- ✓ Fully disengaged staff are defined as those who responded to all six of these questions with either “disagree” or “strongly disagree”.

## Results by question

The tables below provide a breakdown of responses to individual questions in the staff survey. These show how staff responded to each of the questions, represented as percentages which fall into one of three categories: Positive, Neutral or Negative. The way that responses are categorised is shown below:



### Important Notes:

- ✓ Results are presented as whole numbers to make the results easier to read.
- ✓ A low % response rate could mean that survey results don't fully represent the views of staff in that service area.
- ✓ Original values have been rounded down (.00 to .49) or rounded up (.50 to .99) at the final stage of calculating the results.
- ✓ This rounding means that some results may total slightly more or less than 100%
- ✓ Questions from the Workplace Health section of the survey were included to enable the Health and Wellbeing Team to benchmark progress against priorities from the 2015 Workplace Health Survey; as such, those responses have been excluded from these results.

This table shows staff survey response rates achieved by directorate (as a percentage of their headcount), ranked highest to lowest:

Service Area	Response rate
Economy and Planning	85%
Corporate Function, Procurement & Programme Office	79%
People and Business	77%
Adult Care Commissioning & Housing	76%
Communities & Communications	74%
Commissioning, Performance and Schools Effectiveness	68%
Adult Social Care Operations	68%
Finance	67%
Legal and Governance	64%
Operational Children's Services	63%
Public Health	58%
Highways and Transport	50%
Waste and Environment	40%
Wiltshire Council	65.7%

These tables provide detailed breakdowns of responses to the individual questions which inform both the previous People Strategy themes and the new People Strategy pillars:

#### Results for 2011-15 People Strategy themes - individual questions:

Community-focused culture		% Positive 2016	% Positive 2014	% Positive 2012	Change in % Positive Responses (2014 to 2016)
20	The council has made it clear about how I am expected to behave	96	95	92	+1%
53	Where I work we get feedback on how satisfied our customers are with our work	54	55	56	-1%
54	We act on the feedback we receive from customers	65	66	66	-1%
55	My team regularly looks for ways of improving services to our customers	76	78	74	-2%
<b>Theme Average</b>		<b>73</b>	<b>74</b>	<b>72</b>	<b>-1%</b>

Innovative ideas		% Positive 2016	% Positive 2014	% Positive 2012	Change in % Positive Responses (2014 to 2016)
2	Wiltshire Council manages change effectively	43	43	38	0%
3	I am able to make decisions without fear of being blamed if things go wrong	60	56	50	+4%
41	There are sufficient opportunities for me to receive training and development to improve my skills in my current job	45	61	55	-16%
47	Working for Wiltshire Council makes me want to do the best job I can	63	61	57	+2%
<b>Theme Average</b>		<b>53</b>	<b>55</b>	<b>50</b>	<b>-2%</b>



<b>Proud, passionate people</b>		<b>% Positive 2016</b>	<b>% Positive 2014</b>	<b>% Positive 2012</b>	<b>Change in % Positive Responses (2014 to 2016)</b>
43	I am proud to work for Wiltshire Council	62	62	55	0%
44	I would recommend Wiltshire Council as a great place to work	54	53	45	+1%
46	I feel a strong sense of belonging to this organisation	50	49	43	+1%
48	Wiltshire Council motivates me to contribute more than is normally required in my work	44	43	38	+1%
<b>Theme Average</b>		<b>53</b>	<b>52</b>	<b>45</b>	<b>+1%</b>

<b>Simple, effective systems</b>		<b>% Positive 2016</b>	<b>% Positive 2014</b>	<b>% Positive 2012</b>	<b>Change in % Positive Responses (2014 to 2016)</b>
5	My line manager is open to my ideas and suggestions for change	78	77	73	+1%
10	I receive regular and constructive feedback from my line manager which helps me to focus on improving my performance	64	64	57	0%
17	Where I work I have the resources I need to do my job effectively	58	65	61	-7%
49	There is good co-operation between teams I work with	69	67	65	+2%
<b>Theme Average</b>		<b>67</b>	<b>68</b>	<b>64</b>	<b>-1%</b>

<b>Smart workforce planning</b>		<b>% Positive 2016</b>	<b>% Positive 2014</b>	<b>% Positive 2012</b>	<b>Change in % Positive Responses (2014 to 2016)</b>
4	I am aware of the council's vision and aims	80	77	73	+3%
8	I have had an appraisal in the last 12 months	59	55	61	+4%
35	I am confident that on important matters my thoughts are communicated upwards by my line manager	65	61	55	+4%
42	The learning and development I have received is helping to develop my career	41	52	48	-11%
<b>Theme Average</b>		<b>61</b>	<b>61</b>	<b>59</b>	<b>0%</b>

<b>Strong leadership and vision</b>		<b>% Positive 2016</b>	<b>% Positive 2014</b>	<b>% Positive 2012</b>	<b>Change in % Positive Responses (2014 to 2016)</b>
25	My line manager recognises and acknowledges when I have done my job well	76	75	71	+1%
36	My line manager motivates and inspires me to be more effective in my job	62	61	53	+1%
38	Our leaders (associate directors and corporate directors) are sufficiently visible	30	36	37	-6%
40	Poor performance is dealt with effectively where I work	34	32	28	+2%
<b>Theme Average</b>		<b>51</b>	<b>51</b>	<b>47</b>	<b>0%</b>

**Results for 2017-21 People Strategy pillars – individual questions:**

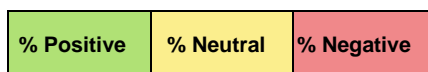
<b>Empowerment</b>		<b>% Positive</b>	<b>% Negative</b>
3	I am able to make decisions without fear of being blamed if things go wrong	60	16
5	My line manager is open to my ideas and suggestions for change	78	7
14	I understand how my work contributes to the success of the organisation	86	4
36	My line manager motivates and inspires me to be more effective in my job	62	12
<b>Pillar Average</b>		<b>72</b>	<b>10</b>

<b>Innovation</b>		<b>% Positive</b>	<b>% Negative</b>
2	Wiltshire Council manages change effectively	43	24
41	There are sufficient opportunities for me to receive training and development to improve my skills in my current job	45	31
48	Wiltshire Council motivates me to contribute more than is normally required in my work	44	15
17	Where I work I have the resources I need to do my job effectively	58	25
42	The learning and development I have received is helping to develop my career	41	23
<b>Pillar Average</b>		<b>46</b>	<b>24</b>

<b>Collaboration</b>		<b>% Positive</b>	<b>% Negative</b>
50	I am clear how the objectives of my role link to my team's / service's objectives	83	5
53	Where I work we get feedback on how satisfied our customers are with our work	54	19
54	We act on the feedback we receive from customers	65	7
56	I believe my job makes a difference to the community	81	4
<b>Pillar Average</b>		<b>71</b>	<b>9</b>

## Change

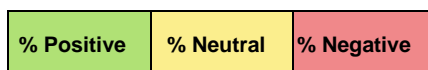
**Section Average:  
67% Positive**



			% Positive 2016	% Positive 2014	% Positive 2012
02	Wiltshire Council manages change effectively		43	43	38
03	I am able to make decisions without fear of being blamed if things go wrong		60	56	50
04	I am aware of the council's vision and aims		80	77	73
05	My line manager is open to my ideas and suggestions for change		78	77	73
06	I understand why changes are made		74	72	70

## Your Role

**Section Average:  
64% Positive**



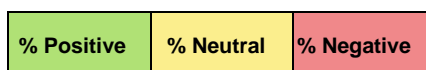
			% Positive 2016	% Positive 2014	% Positive 2012
07	My line manager has made it clear about what I am expected to achieve in my role/job		82	81	76
08	I have had an appraisal in the last 12 months *		59	55	61
09	The appraisal process is a useful tool in aiding personal development and/or improving performance		52	54	61
10	I receive regular and constructive feedback from my line manager which helps me to focus on improving my performance		64	64	57
11	My work load is about right for the time that I have		53	50	50
12	My job makes good use of my skills and abilities		72	72	68
13	I am able to strike the right balance between my work and home life		70	68	67
14	I understand how my work contributes to the success of the organisation		86	85	84
15	I have enough time to do my job effectively		51	49	48
16	I can meet the requirements of my job without regularly working excessive hours		55	54	53

\* Question options were "Yes", "No" and "I have not finished my probationary period".

% Positive = "Yes" responses; % Negative = "No" responses; % Neutral = "I have not finished my probationary period".

## Culture, wellbeing and safety

**Section Average:  
80% Positive**

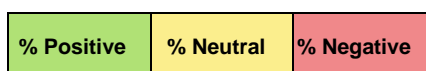


			% Positive 2016	% Positive 2014	% Positive 2012
17	Where I work I have the resources I need to do my job effectively		58	65	61
18	I am satisfied with my working conditions (e.g. noise, light, decoration, cleanliness, temperature and space)		63	61	58
19	I am treated with fairness and respect at Wiltshire Council		76	73	69
20	The council has made it clear about how I am expected to behave		96	95	92
21	Health and Safety is taken seriously in this organisation		83	78	77
22	In the last year, I have personally experienced bullying or harassment whilst at work. *		91	91	78
23	In the last year, I have personally experienced discrimination whilst at work. *		95	95	n/a
24	I would feel able to report bullying/harassment or discrimination without worrying that I would be treated in a negative way		74	70	n/a

\* Question options were "Yes" or "No". Results reversed for these questions, i.e. % Positive figure = those who ticked "No"; % Negative figure = those who ticked "Yes".

## Reward and recognition

**Section Average:  
59% Positive**

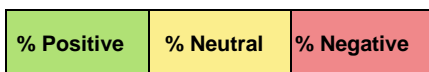


			% Positive 2016	% Positive 2014	% Positive 2012
25	My line manager recognises and acknowledges when I have done my job well		76	75	71
26	I feel valued and recognised for the work I do		66	62	56
27	I think that corporate awards are a good way to value and recognise staff for the work that they do		30	35	n/a
28	I am aware of the Wiltshire Rewards staff benefits scheme *		90	90	n/a
28a	I believe that the Wiltshire Rewards scheme enhances the council's benefits package		39	38	n/a
29	Considering my duties and responsibilities, I am satisfied with the total benefits package that I receive		53	50	47

\* Question options were "Yes" or "No": % Positive figure = those who ticked "Yes"; % Negative figure = those who ticked "No".

**Communication**

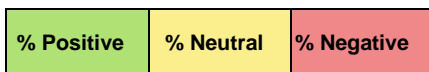
**Section Average:  
56% Positive**


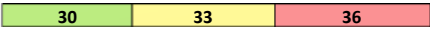
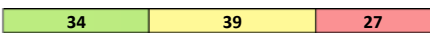


			% Positive 2016	% Positive 2014	% Positive 2012
30	I am satisfied that the information I receive from management within my service on what is going on in Wiltshire Council enables me to do my job effectively		60	63	58
31	Senior Management (Head of service and above) are open and honest in their communication with staff		47	49	38
32	The information contained in the Electric Wire (weekly email newsletter) is useful and informative		61	63	64
33	I use "The Wire" (staff intranet) regularly to obtain information		58	n/a	n/a
34	Did you attend one of the recent staff forums *		56	n/a	n/a
34a	I found the staff forum useful and informative		53	n/a	n/a

**Management and leadership**

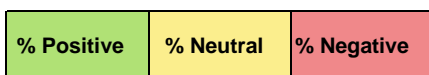
**Section Average:  
53% Positive**



			% Positive 2016	% Positive 2014	% Positive 2012
35	I am confident that on important matters my thoughts are communicated upwards by my line manager		65	61	55
36	My line manager motivates and inspires me to be more effective in my job		62	61	53
37	My line manager trusts me to take responsibility for my work		90	89	87
38	Our leaders (associate directors and corporate directors) are sufficiently visible		30	36	37
39	I have confidence in our leaders (associate directors and corporate directors)		38	39	37
40	Poor performance is dealt with effectively where I work		34	32	28

### Learning and development

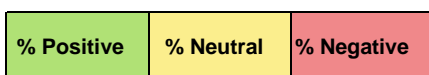
**Section Average:  
43% Positive**



			% Positive 2016	% Positive 2014	% Positive 2012
41	There are sufficient opportunities for me to receive training and development to improve my skills in my current job		45	61	55
42	The learning and development I have received is helping to develop my career		41	52	48

### Employee engagement

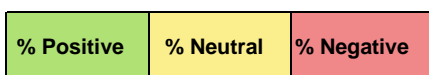
**Section Average:  
58% Positive**



			% Positive 2016	% Positive 2014	% Positive 2012
43	I am proud to work for Wiltshire Council		62	62	55
44	I would recommend Wiltshire Council as a great place to work		54	53	45
45	I feel committed to the organisation's goals		72	70	66
46	I feel a strong sense of belonging to this organisation		50	49	43
47	Working for Wiltshire Council makes me want to do the best job I can		63	61	57
48	Wiltshire Council motivates me to contribute more than is normally required in my work		44	43	38

### Team work

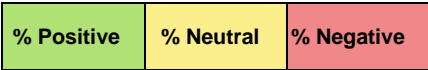
**Section Average:  
76% Positive**



			% Positive 2016	% Positive 2014	% Positive 2012
49	There is good co-operation between teams I work with		69	67	65
50	I am clear how the objectives of my role link to my team's/service's objectives		83	82	78
51	The people in my team co-operate to get the work done		87	86	84
52	Where I work we have effective team meetings		64	63	60

**Customers**

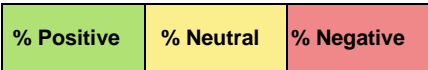
**Section Average:  
69% Positive**



			% Positive 2016	% Positive 2014	% Positive 2012
53	Where I work we get feedback on how satisfied our customers are with our work		54	55	56
54	We act on the feedback we receive from customers		65	66	66
55	My team regularly looks for ways of improving services to our customers		76	78	74
56	I believe my job makes a difference to the community		81	81	79
57	In my opinion the council is committed to customer satisfaction		68	69	67

**Action**

**Section Average:  
55% Positive**



			% Positive 2016	% Positive 2014	% Positive 2012
58	Did you complete a staff survey in 2014? *		73	69	68
59	I believe that action will be taken on problems identified in this survey		37	37	39

\* Question options were "Yes" or "No": % Positive figure = those who ticked "Yes"; % Negative figure = those who ticked "No".

This page is intentionally left blank



**Wiltshire Council**

**Cabinet**

**14 March 2017**

---

**Subject: Report on Treasury Management Strategy 2016/2017  
Third Quarter ended 31 December 2016**

**Cabinet member: Councillor Dick Tonge - Finance**

**Key Decision: No**

---

## **Executive Summary**

The Council has adopted a Treasury Management Strategy and an Annual Investment Strategy (AIS) for 2016/2017 at its meeting on 23 February 2016.

In addition to an Annual Report, the policy requires quarterly reports to review the Treasury Management Strategy (TMS). This is the third quarterly report of 2016/2017 and covers the period from 1 April 2016 to 31 December 2016.

## **Proposal**

The Cabinet is asked to note that the contents of this report are in line with the Treasury Management Strategy.

## **Reasons for Proposal**

To give members an opportunity to consider the performance of the Council in the period to the end of the quarter against the parameters set out in the approved Treasury Management Strategy for 2016/2017.

**Carolyn Godfrey – Corporate Director**

**Subject: Report on Treasury Management Strategy 2016/2017  
Third Quarter ended 31 December 2016**

**Cabinet member: Councillor Richard Tonge - Finance**

**Key Decision: No**

---

## **1. Background & Purpose of Report**

- 1.1 The Council adopted a Treasury Management Strategy for 2016/2017 at its meeting on 23 February 2016, incorporating Prudential Indicators (PrIs), Treasury Management Indicators (TrIs) and an Annual Investment Strategy, in accordance with the Prudential Code for Capital Finance in Local Authorities (the Prudential Code).
- 1.2 The Strategy states that, in addition to an Annual Treasury Report reviewing the year as a whole, quarterly reports would be submitted to Cabinet reviewing the Treasury Management Strategy. This report covers the third quarter of 2016/2017, ended 31 December 2016.

## **2. Main Considerations for the Cabinet**

- 2.1 This report reviews management actions in relation to:
  - a) the PrIs, TrIs originally set for the year and the position at the 31 December 2016;
  - b) other treasury management actions during the period; and
  - c) the approved Annual Investment Strategy.

### **Review of Prudential and Treasury Indicators and Treasury Management Strategy for 2016/2017**

- 2.2 A full detailed listing of the indicators required by the CIPFA Prudential Code, Treasury Management Code and Treasury Management Guidance Notes is given in Appendix 1.

## **Other Debt Management Issues**

### 2.3 Debt Rescheduling

Opportunities to reschedule PWLB debt are significantly constrained by the high level of premiums payable for early repayment. The position is continually monitored and any opportunities to reschedule cost effectively will be considered, should they arise. However, unless the PWLB change policy regarding early repayment, debt rescheduling is currently very unlikely.

### 2.4 Cash Surpluses and Deficits

Any short term cash surpluses or deficits have been managed through temporary deposits or loans, respectively. Temporary deposits outstanding at 31 December 2016 amounted to £77.572 million, as detailed in Appendix 3.

### 2.5 Icelandic Banks

No change.

### 2.6 Longer Term Cash Balances

2.6.1 Interest rate movements in the period have not provided many opportunities for an increased return by longer term investment of the more permanent cash surpluses, such as reserves and balances. However, the availability of any appropriate longer term investment opportunities is continually monitored, such as “special tranche rates” that are offered by ‘Government backed’ banks. The rates available from these types of investments may now be reduced as Lloyds are and RBS will eventually no longer be partially Government owned, as the Government’s programme of the sale of shares in the banks progresses. This has already led to, in the case of Lloyds, and will lead to, in the case of RBS, a change in the credit rating level and, consequently, the recommended duration for deposits, thus affecting the interest rate available to the Council. Lloyds Bank continues to offer “special tranche rates” and has only, currently, been affected in terms of duration.

2.6.2 Rates have remained low and, following the referendum and the subsequent fall in the Bank Rate, interest rates available have decreased, although the “special tranche rate” investments offered, particularly, by Lloyds Bank have remained relatively competitive. Details of investments outstanding are shown in Appendix 3.

## **Review of Investment Strategy**

2.7 The Treasury Management Strategy Statement (TMSS) for 2016/2017, which includes the Annual Investment Strategy, was approved by the Council on 23 February 2016. It sets out the Council’s investment priorities as being:

- a) Security of capital;
- b) Liquidity; and
- c) Yield.

- 2.8 The Council will also aim to achieve the optimum return (yield) on investments commensurate with proper levels of security and liquidity. In the current economic climate it is considered appropriate to keep investments short term to cover cash flow needs but also to seek out value available in higher rates in periods up to 12 months with highly credit rated financial institutions, using Capita Treasury Solution's suggested creditworthiness approach, including sovereign credit rating and Credit Default Swaps (CDS) overlay information provided by Capita.
- 2.9 Following the EU Referendum decision to leave the EU, the Council's Investment Strategy has been reviewed and there are no issues for the Council as a consequence of the financial effects of the decision at this stage. The impact of any further potential developments/effects on the Strategy following the decision to leave the EU will be continually reviewed.
- 2.10 All investments have been conducted within the agreed Annual Investment Strategy and made only to authorised lenders within the Council's high credit quality policy.
- 2.11 Credit ratings are incorporated within the approved Investment Strategy as detailed within the Treasury Management Strategy 2016/2017 and the current ratings have been shown against the deposits outstanding in Appendix 3.

### **3. Overview and Scrutiny Engagement**

- 3.1 The Financial Planning Task Group sits under the OS Management Committee and leads on scrutiny of the budget throughout the year and during the budget setting process. The task group has received a briefing on the purpose of the Treasury Management Strategy overall, but does not scrutinise each quarterly report.

### **4. Safeguarding Implications**

- 4.1 None have been identified as arising directly from this report.

### **5. Public Health Implications**

- 5.1 None have been identified as arising directly from this report.

### **6. Corporate Procurement Implications**

- 6.1 None have been identified as arising directly from this report.

### **7. Equalities Impact of the Proposal**

- 7.1 None have been identified as arising directly from this report.

### **8. Environmental and Climate Change Considerations**

- 8.1 None have been identified as arising directly from this report.

### **9. Risks Assessment and Financial Implications**

- 9.1 All investment has been at fixed rates during the period. The Council's current average interest rate on long term debt is 3.77%, which compares favourably with similar rates of other UK local authorities.
- 9.2 The primary management risks to which the Council is exposed are adverse movements in interest rates and the credit risk of counterparties.
- 9.3 Investment counterparty<sup>1</sup> risk is controlled by assessing and monitoring the credit risk of borrowers as authorised by the Annual Investment Strategy.

## **10. Legal Implications**

10.1 None have been identified as arising directly from this Report.

## **11. Options Considered**

- 11.1 The availability of any longer term investment opportunities, such as those offered by "special tranche rates", is continually monitored.
- 11.2 Also any options available to provide savings from rescheduling long term borrowing are continually assessed in liaison with our treasury advisers.

## **12. Conclusion**

12.1 Cabinet is asked to note the report.

Michael Hudson  
Associate Director, Finance.

---

Report Author:

Stuart Donnelly, Head of Finance (Corporate) Tel: 01225 718582, email: [stuart.donnelly@wiltshire.gov.uk](mailto:stuart.donnelly@wiltshire.gov.uk)

## **Background Papers**

The following unpublished documents have been relied on in the preparation of this Report: NONE

## **Appendices**

- Appendix 1 Prudential and Treasury Indicators for 2016/2017, 2017/2018 & 2018/2019
- Appendix 2 Summary of Long Term Borrowing 1 April 2016 – 31 December 2016
- Appendix 3 Summary of Temporary Loans and Deposits 1 April 2016 – 31 December 2016

---

<sup>1</sup> A Counterparty is a term most commonly used in the financial services industry to describe a legal entity, unincorporated entity or collection of entities (e.g. lender/borrower) to which an exposure to financial risk might exist.

**Prudential and Treasury Indicators for 2016/2017, 2017/2018 & 2018/2019**

**Prudential Indicators**

**Prl 1 – Capital Expenditure**

1. The table below shows the revised figures for capital expenditure based on the current approved capital budget.

	<b>2015/2016 Actual Outturn</b>	<b>2016/2017 Original Estimate</b>	<b>2016/2017 Revised Estimate</b>	<b>2016/2017 Actual to 31/12/16</b>
	<b>£million</b>	<b>£million</b>	<b>£million</b>	<b>£million</b>
General Fund	101.6	111.8	92.1	44.0
HRA	13.3	42.5	23.1	12.2

2. The (revised) estimate and actual to date for 2016/2017 has been amended to reflect the most up to date capital budget and expenditure position.
3. The Capital Programme is monitored closely throughout the year and progress on the programme is reported to the Cabinet Capital Asset Committee (CCAC). The Month 9 2016/2017 report (as at 31 December 2016) was taken to CCAC in February 2017.

4. **Prl 2 – Ratio of Financing Costs to Net Revenue Stream**

	<b>2015/2016 Actual Outturn</b>	<b>2016/2017 Original Estimate</b>	<b>2016/2017 Revised Estimate</b>
General Fund	7.0%	8.1%	7.3%
Housing Revenue Account	14.9%	15.2%	15.0%

5. The General Fund revised estimate for 2016/2017 is lower than the original estimate mainly due to lower than expected financing costs (including lower interest payments and principal charges (MRP)) offset slightly by lower interest receivable as a result of lower cash balances, together with a reduction in interest rates.
6. **Prl 3 – Estimate of Incremental Impact of Capital Investment Decisions on the Council Tax**

This indicator is only relevant at budget setting time and for 2016/2017 was calculated as being £-17.81.

**Prudential and Treasury Indicators for 2016/2017, 2017/2018 & 2018/2019**

7. Pr1 4 – Gross Borrowing compared to Capital Financing Requirement (CFR)

	<b>2015/2016 Actual Outturn £million</b>	<b>2016/2017 Original Estimate £million</b>	<b>2016/2017 Revised Estimate £million</b>
CFR – General Fund	394.7	439.1	413.7
CFR – HRA	122.6	122.6	123.3
Gross Borrowing – General Fund	231.1	314.1	262.9
Gross Borrowing – HRA	118.8	118.8	118.8
<b>CFR not funded by gross borrowing – General Fund</b>	<b>163.6</b>	<b>125.0</b>	<b>150.8</b>
<b>CFR not funded by gross borrowing – HRA</b>	<b>3.8</b>	<b>3.8</b>	<b>4.5</b>

8. Pr1 4 measures the so called “Golden Rule” which ensures that over the medium term net borrowing is only for capital purposes.
9. CFR not funded by gross borrowing represents capital expenditure met by internal borrowing, i.e. funded from the Council’s own funds, such as reserves and balances and working capital (an accounting term for the difference, at a point in time, between what the Council owes and what is owed to it).
10. Internal borrowing is cheaper than external borrowing, however, the ability to borrow internally will depend upon the sufficiency of reserves, balances and working capital. The sufficiency needs to be monitored and projections carried out to indicate where any adverse movements are expected, that could jeopardise the Council’s cash flow position, making it necessary to replace internal borrowing with external borrowing.
11. A continual review of the capital programme over the reporting period has led to a change in the 2016/2017 revised estimate when compared with the original estimate (which was prepared at budget setting time in February 2016 prior to the beginning of the financial year).
12. The revised estimate for General Fund CFR and gross borrowing is based on the revised 2016/2017 Capital Programme, which currently stands at £115.234 million.
13. Pr1 5 – Compliance with the CIPFA Code of Practice for Treasury Management in the Public Services

All actions have been compliant with the CIPFA Code of Practice.

**Prudential and Treasury Indicators for 2016/2017, 2017/2018 & 2018/2019**

**Treasury Management Indicators within the Prudential Code**

14. The Operational Boundary and Authorised Limit, as approved by Council in February 2016 as part of the Treasury Management Strategy, are detailed below. These are control limits and do not compare with actual borrowing figures. Capital funding requirements are not automatically taken as loans and may be funded from cash balances.

15. Trl 1 – Authorised Limit for External Debt

<b>Authorised Limit</b>	<b>2016/2017 £million</b>	<b>2017/2018 £million</b>	<b>2018/2019 £million</b>
Borrowing – General Fund	471.7	483.0	466.6
Borrowing – HRA	123.2	123.2	123.2
Other Long Term Liabilities	0.2	0.2	0.2
<b>TOTAL</b>	<b>595.1</b>	<b>606.4</b>	<b>590.0</b>

The External Debt limit includes a margin above the Operational Boundary to allow for any unusual or unpredicted cash movements. The limit has not been exceeded in the reporting period.

16. Trl 2 – Operational Boundary for External Debt

<b>Operational Boundary</b>	<b>2016/2017 £million</b>	<b>2017/2018 £million</b>	<b>2018/2019 £million</b>
Borrowing – General Fund	460.2	471.2	455.2
Borrowing – HRA	123.2	123.2	123.2
Other Long Term Liabilities	0.2	0.2	0.2
<b>TOTAL</b>	<b>583.6</b>	<b>594.6</b>	<b>578.6</b>

The Operational Boundary is set at a limit that facilitates the funding of the Council's entire financing requirement through loans, if this was the most cost effective approach. The limit was set to anticipate expected expenditure and has not been exceeded during the reporting period (maximum borrowing during the period was £347.9 million).

17. Trl 3 – External Debt

	<b>31/03/16 Actual £million</b>	<b>30/12/16 Actual £million</b>	<b>31/03/17 Expected £million</b>
Borrowing – General Fund	231.1	229.1	262.9
Borrowing – HRA	118.8	118.8	118.8
<b>Total Borrowing</b>	<b>349.9</b>	<b>347.9</b>	<b>381.7</b>
Other Long Term Liabilities	0.2	0.2	0.2
<b>TOTAL</b>	<b>350.1</b>	<b>348.1</b>	<b>381.9</b>



**Prudential and Treasury Indicators for 2016/2017, 2017/2018 & 2018/2019**

18. Trl 3 shows the gross External Debt outstanding, both long-term loans and temporary borrowing. No debt has been repaid this quarter. The figure for actual borrowing at 31 March 2016 is stated at the amount that reflects actual outstanding external borrowing at the end of 2015/2016 (i.e. excluding accounting adjustments, such as accrued interest and effective interest rate adjustments).

**Treasury Management Indicators within the Treasury Management Code**

19. Trl 4a – Upper Limit on Fixed Interest Rate Exposures

**The Council's upper limit for fixed interest rate exposure for the period 2016/2017 to 2018/2019 is 100% of net outstanding principal sums.**

20. Trl 4b – Upper Limit on Variable Interest Rate Exposures

**The Council's upper limit for variable interest rate exposure is 52% for 2016/2017, 54% for 2017/2018 and 56% for 2018/2019 of net outstanding principal sums.**

21. Options for borrowing during the period were considered, however, (mainly) due to the premium that would be incurred on the early repayment of debt, no new borrowing was taken.

22. Trl 5 – Upper & Lower Limits on the Maturity Structure of Borrowing

<b>Limits on the Maturity Structure of Borrowing</b>	<b>Upper Limit</b>	<b>Lower Limit</b>	<b>Position at 31/12/16</b>
Maturing Period:			
- under 12 months	25%	0%	12%
- 12 months and within 24 months	25%	0%	4%
- 2 years and within 5 years	45%	0%	10%
- 5 years and within 10 years	75%	0%	14%
- 10 years and above	100%	0%	60%

23. No long term borrowing has been taken during the period. If interest rates are favourable and an opportunity exists to take further borrowing this year we will, according to need, look to match borrowing with this maturity structure.

24. Trl 6 – Principal Sums invested for periods of longer than 364 days

This Prl is now covered by the Annual Investment Strategy for 2016/2017, which set a limit of £30 million, as approved by Council in February as part of the Treasury Management Strategy. During the first nine months of 2016/2017 no cost effective investments have been identified. The Authority however holds a number of money market funds and a 35 day notice deposit account, which offer competitive interest rates and, in the case of money market funds, instant access for flexibility of cash management.

**Prudential and Treasury Indicators for 2016/2017, 2017/2018 & 2018/2019**

25. Trl 7 - Local Prudential Indicator – Loan Repayment Structure

In addition to the main maturity indicators it was agreed in the approved Treasury Management Strategy that no more than 15% of long term loans should fall due for repayment within any one financial year. The actual maximum in any one year is currently 12.65%. This relates to £44 million of potential loan repayments in 2017/2018, however £34 million of this relates to LOBOs. Through call options, the lender of a LOBO has the right to change the interest rate at various dates within the loan period. If this were to happen, the Council would repay the loans and consider whether it needs to refinance them. In the current interest rate climate (where interest rates are expected to remain low for some time) the LOBOs are extremely unlikely to be called, but must be included in the repayment structure at the earliest possible call date. A summary maturity profile is shown in Appendix 2.

**SUMMARY OF LONG TERM BORROWING 1 APRIL 2016 – 31 DECEMBER 2016**

**Loans Raised During the Period**

Date Raised	Lender	Amount (£m)	Type	Interest rate (%)	Maturity date	No. of years
		0.000				
<b>Total</b>		0.000				

Average period to maturity (years) 0.00

Average interest rate (%) 0.00

**Maturity Profile at 31 December 2016**

Year	Amount (£m)					% age		Average rate (%)	
	PWLB Loans	Market Loans		Total		Next Call Date	Contracted Maturity	Next Call Date	Contracted Maturity
		LOBOs at Next Call Date	LOBOs at Contracted Maturity	Next Call Date	Contracted Maturity				
(A)	(B)	(C)	(A)+(B)	(A)+(C)					
0 to 5 years	56.810	40.000	-	96.810	56.810	27.8	16.3	3.403	2.684
6 to 15 years	100.623	-	-	100.623	100.623	28.9	28.9	3.431	3.431
16 to 25 years	64.000	-	-	64.000	64.000	18.4	18.4	3.945	3.945
26 to 50 years	65.500	15.000	51.000	80.500	116.500	23.1	33.5	4.465	4.460
Over 50 years	-	6.000	10.000	6.000	10.000	1.7	2.9	4.210	4.206
<b>Totals</b>	286.933	61.000	61.000	347.933	347.933	100.0	100.0	3.770	3.770

Average period to maturity (years) 20.13 22.36

CIPFAs Guidance Notes on Treasury Management in the Public Services recommends that the Treasury Management Strategy Reports include LOBO (Lender Option Borrower Option) loans at the earliest date on which the lender can require payment, deemed to be the next 'call date'. At that date the lender may choose to increase the interest rate and the borrower (the Council) may accept the new rate or repay the loan (under the current approved Treasury Management Strategy, the Council would repay the loan). The decision [whether or not the lender chooses to exercise their right to alter the interest rate] will depend on market conditions (interest rates). Current market conditions, where interest rates are predicted to remain low for some time, indicate that it is highly unlikely that lenders will call the loans in the immediate future.

The alternative method of determining the maturity profile of LOBO loans, based on contracted maturity dates, is used in the statement of accounts.

The table above includes the maturity profiles using both the earliest date on which the lender can require payment and the contracted maturity dates.

**SUMMARY OF TEMPORARY LOANS AND DEPOSITS  
1 APRIL 2016 – 31 DECEMBER 2016**

**Deposits Outstanding at 31 December 2016**

<b>Borrower</b>	<b>Amount £m</b>	<b>Terms</b>	<b>Interest Rate</b>	<b>Capita Credit Rating at 31/12/2016</b>
National Bank of Abu Dhabi	8.000	Fixed to 04/03/2017	0.48	Orange - 12 Months
Surry Heath Borough Council	6.000	Fixed to 16/01/2017	0.25	Yellow - 5 years
Lloyds Bank	5.000	Fixed to 17/01/2017	0.50	Red - 6 Months
Qatar National Bank	8.000	Fixed to 14/02/2017	0.40	Orange - 12 Months
HSBC	5.800	No fixed maturity date	0.10	Orange - 12 Months
Black Rock Money Market Fund	14.899	No fixed maturity date	0.31	AAA
Prime Rate Money Market Fund	14.804	No fixed maturity date	0.32	AAA
Goldman Sachs Money Market Fund	0.067	No fixed maturity date	0.24	AAA
Standard Life Investments Liquidity Funds	15.001	No fixed maturity date	0.34	AAA
JP Morgan Money Market Fund	0.001	No fixed maturity date	0.30	AAA
<b>Total</b>	<b>77.572</b>			

Investments held have increased by £19.258 million between the end of September 2016 (as reported in the previous Quarterly Treasury Report) and at the end of December 2016. This reflects changes in cash flows/timing differences (e.g. movements in the value of receipts and payments), resulting in an increase in cash available for investment. The cash position is reviewed regularly to ensure that the Council maintains an appropriate level of cash to support the Council's cash flow commitments. Timing differences are expected to reverse as the financial year progresses. The change in the investment position is shown in the table below.

	<b>Year Ended 31/03/2016 £m</b>	<b>Quarter Ended 30/06/2016 £m</b>	<b>Change £m</b>	<b>Quarter Ended 30/09/2016 £m</b>	<b>Change £m</b>	<b>Quarter Ended 31/12/2016 £m</b>	<b>Change £m</b>
<b>Total Deposits Outstanding</b>	<b>27.371</b>	<b>56.250</b>	<b>28.879</b>	<b>58.314</b>	<b>2.064</b>	<b>77.572</b>	<b>19.258</b>

**Temporary Loans Outstanding at 31 December 2016**

<b>Lender</b>	<b>Amount £m</b>	<b>Terms</b>	<b>Interest Rate</b>
There were no temporary loans outstanding at 31 December 2016			
<b>Total</b>	<b>0.000</b>		

Wiltshire Council

Cabinet

14 March 2017

---

**Subject:** Adoption of Chippenham Site Allocations Plan

**Cabinet Member:** Councillor Toby Sturgis - Strategic Planning, Development Management, Strategic Housing, Operational Property and Waste

**Key Decision:** Yes

---

## Executive Summary

The Council has received the Inspector's Report into the examination of the Chippenham Site Allocations Plan (CSAP). It concludes that, subject to the changes set out in the report, the submitted CSAP is sound. The Inspector's Report is final and the examination is now closed. This leaves this authority with the choice of adopting the CSAP, as amended in response to the Inspectors recommendations, or not.

If adopted by the Council an adoption notice will be published providing a six week period for legal challenge during which any person or organisations may make an application to the High Court on the grounds that preparation of the Plan did not comply with the correct procedures.

Upon adoption the CSAP will become part of the statutory development plan for Wiltshire alongside the Wiltshire Core Strategy. The authority is legally bound to take planning decisions in accordance with its policies unless there are material considerations which merit setting them aside in any given case. It sets out strategic policies for managing development at Chippenham in accordance with the Wiltshire Core Strategy,

## Proposals

### That Cabinet:

- (i) Notes the content of the Inspector's report into the examination of the Chippenham Site Allocations Plan (**Appendix 1**) and his conclusions regarding legal compliance and soundness and accepts the modifications in the Appendix of the Inspector's report, which the Inspector considers are necessary to make the plan sound in accordance with legislation.
- (ii) Recommends to Council that the Chippenham Site Allocations Plan, as amended as set out in (i) above and attached at **Appendix 2**, including the Additional Modifications set out in **Appendix 3**, be adopted as part of the development plan for Wiltshire.

- (iii) Delegates authority to the Associate Director for Economic Development and Planning in consultation with the Associate Director for Legal and Governance and the Cabinet Member for Strategic Planning, Development Management, Strategic Housing, Operational Property and Waste for the Policies Map to be amended in line with the modifications identified in (ii) and for further minor textual changes to be made to the Chippenham Site Allocations Plan prior to publication in the interests of accuracy and consistency.
- (iv) Following approval of Council, agrees that the Associate Director for Economic, Development and Planning in consultation with the Associate Director for Legal and Governance and the Cabinet Member for Strategic Planning, Development Management, Strategic Housing, Operational Property and Waste, undertakes the final stages associated with the formal adoption and publication of the Chippenham Site Allocations Plan.

### **Reason for Proposals**

The Chippenham Site Allocations Plan will form part of the Council's Policy Framework. In accordance with the Local Government Acts 1972 and 2000, and the Council's constitution it must first be approved by Cabinet before it is adopted by Council. As the document has been found sound by the Inspector its adoption by the Council would help ensure up to date planning policy is in place at Chippenham and provide effective policies to ensure the sustainable development of Chippenham.

**Dr Carlton Brand**  
**Corporate Director**

**14 March 2017**

---

**Subject: Adoption of Chippenham Site Allocations Pan**

**Cabinet Member: Councillor Toby Sturgis – Strategic Planning,  
Development Management, Strategic Housing,  
Operational Property and Waste**

**Key Decision: Yes**

---

### **Purpose of Report**

1. To:
  - (i) Inform Cabinet of the Inspector's Report into the examination of the Chippenham Site Allocations Plan and his conclusions regarding legal compliance and soundness.
  - (ii) Seek approval that the Chippenham Site Allocations Plan, as amended by the Main Modifications in the Inspector's Report and other Additional Modifications that have arisen during the examination or been made in the interest of accuracy and consistency, be recommended to Council for adoption.
  - (iii) Seek approval for the Associate Director for Economic Development and Planning, in consultation with the Associate Director for Legal and Governance and the Cabinet Member for Strategic Planning, Development Management, Strategic Housing, Operational Property and Waste, to undertake the final stages associated with the formal adoption by the Council of the Chippenham Site Allocations Plan.

### **Relevance to the Council's Business Plan**

2. Progression of the development plan for Chippenham is fundamental to realising the overarching aims of the Business Plan 2013-2017 of delivering stronger and more resilient communities. In identifying land to deliver new jobs, homes and community facilities in a way that seeks to minimise impact on the local environment and maximise benefits of development including accessibility to open space and new road infrastructure, it will help deliver a number of outcomes including:
  - Thriving and growing local economy
  - Everyone lives in a high quality environment
  - Healthy, active and high quality lives

## Background

3. On 14 July 2015, following consideration by Cabinet on 9 July, Council approved the submission of the draft Chippenham Site Allocations Plan (the Plan) together with proposed changes to the Secretary of State for examination. The proposed changes had arisen as a result of consultation on the Pre-Submission draft Plan in February 2015.
4. The Plan was subsequently submitted on 30 July 2015. The appointed Inspector, Patrick Whitehead, wrote to the Council on 18 September setting out his Initial Appraisal of the Plan to which the Council responded. On 5 October, the Inspector confirmed that on the basis of the Council's response he was content for the examination to proceed to the hearing sessions. The hearings opened on 10 November and were programmed to run until 19 November 2015.
5. On day two, the Inspector suspended proceedings when the Inspector raised concerns about the evidence supporting the Plan. The Inspector set out his concerns in letters to the Council of 16 and 30 November 2015. In response the Council wrote to the Inspector on 4 December 2015 and provided a Schedule of Work designed to address his concerns.
6. Cabinet on 19 April 2016 noted the progress being made with the Examination of the Plan and Schedule of Work. The outcome of this Schedule of Work was reported to Council on 10 May 2016 where approval was given for the Proposed Modifications to the Plan arising from it. Consultation on the Proposed Modifications to the Plan and the revised evidence base that were the outcome of the Schedule of Work took place over the period 23 May - 5 July 2016. At the same time, consultation was also undertaken on other proposed modifications that had been previously put to the Inspector as part of the examination process, where they still remained valid following the implementation of the Schedule of Work, and included the proposed changes approved by Council referred to in paragraph 3.
7. All comments received as part of this consultation were forwarded to the Inspector for his consideration. Following receipt of this information hearings were reopened between 27 September and 4 October 2016. As a consequence of these hearing sessions further changes were proposed to the draft Plan which were consulted on over the period 31 October to 12 December 2016. The response to this consultation was also sent to the Inspector for his consideration.
8. The Inspector issued his Report to the Council on 21 February 2017. This is attached at **Appendix 1**.
9. Communications between the Council and Inspector and all evidence submitted to the Examination are provided on the Council's website at: [http://www.wiltshire.gov.uk/planninganddevelopment/planningpolicy/chippenhamsiteallocationsplan/chippenham\\_examination.htm](http://www.wiltshire.gov.uk/planninganddevelopment/planningpolicy/chippenhamsiteallocationsplan/chippenham_examination.htm)



## Main Considerations for the Council

10. The Chippenham Site Allocations Plan is a development plan document (DPD), therefore, once adopted, it will form part of the development plan for Wiltshire, alongside the adopted Wiltshire Core Strategy and saved policies in the former District plans. The process for the preparation of DPDs is prescribed by statute and regulation, including the examination stage by an independent Inspector appointed by the Secretary of State. The scope of the Inspector's Report is set out at paragraph 1 of his report:

*“This report contains my assessment of the Chippenham Site Allocations Plan (CSAP) in terms of Section 20(5) of the Planning & Compulsory Purchase Act 2004 (as amended). It considers first whether the Plan's preparation has complied with the duty to co-operate. It then considers whether the Plan is sound and whether it is compliant with the legal requirements. The National Planning Policy Framework (paragraph 182) makes it clear that in order to be sound, a Local Plan should be positively prepared, justified, effective and consistent with national policy.”*

11. **Appendix 1** of this report includes the Inspector's Report in full. In accordance with section 20 (7C) of the 2004 Act the Council asked the Inspector to recommend any main modifications (MM) necessary to rectify any matters in the submitted plan that made the Plan unsound. The recommended main modifications are set out in full as an Appendix to the Inspector's Report. In summary the key modifications, as highlighted by the Inspector in his 'Non-Technical Summary', are:

- The development strategy has been amended to update the housing requirement and include a revised methodology replacing references to first, second and third preferred areas - MMs 5 - 6;
- Policy CH1 and supporting text has been amended to include smaller extension sites and increase the total housing yield for the strategic area - MMs 7 - 17;
- Policy CH2 and supporting text has been amended to clarify the proposals and address concerns with deliverability - MMs 18 - 26; and
- Policy CH3 and supporting text has been deleted in its entirety - MMs 27 - 29.

12. The majority of the Main Modifications relate to those changes put forward by the Council which have been the subject of public consultation during the course of the examination as identified above. All public consultation responses have been taken into account by the Inspector in writing his report, as recognised at paragraph 3 of his report:

*“In arriving at my conclusion in this report I have had regard to the representations resulting from all of these consultations.”*

13. In addition to the Main Modifications that were consulted on either in May or October 2016 (see paragraphs 6 and 7, above), the Inspector has also made a small number of other modifications to Policy CH2 (Rawlings Green) and its supporting text, as referred to in paragraph 98 of his report.
14. The further amendments he has proposed relate to the timely delivery of transport infrastructure and mitigation of landscape impact in relation to the Rawlings Green site. These amendments are included in MM5, MM18 and MM26. In arriving at these conclusions he stated at paragraph 6:  
  
*“I have taken account of the consultation responses in coming to my conclusions in this report and in this light I have made some amendments to the detailed wording of the main modifications and added consequential modifications where these are necessary for consistency or clarity. None of my amendments significantly alters the content of the modifications as published for consultation or undermines the participatory processes and sustainability appraisal that has been undertaken.”*
15. The Inspector’s own modifications do not alter the overall substance of the plan and its policies or undermine the conclusions of the Sustainability Appraisal and Habitats Regulations Assessment, both of which have been updated during the examination and take into account the Council’s proposed main modifications to the Plan (see paragraph 24 below).
16. Attached at **Appendix 3** is a list of Additional Modifications. Additional Modifications can be identified at the discretion of the Council under the Planning and Compulsory Purchase Act 2004 (as amended), s23, (3(b)<sup>1</sup>. These have been included for completeness and relate to typographical errors or minor factual updates which have been made in the interests of accuracy and clarity. The list of Additional Modifications includes some changes consulted on as Main Modifications during the May and October 2016 consultations. These are referred to in paragraph 6 of the Inspector’s Report. (The list of Additional Modifications may be amended further in the interest of accuracy and clarity should further typographical errors be identified before the Plan is published at the time of adoption).
17. The Chippenham Site Allocations Plan as proposed to be adopted is attached at **Appendix 2**. This incorporates the Inspector’s Main Modifications set out in Appendix 1 and the Additional Modifications, set out in Appendix 3. There will be consequential changes to the Wiltshire Policies Map as explained in the Inspector’s Report at paragraphs 7-10.

## Overview and Scrutiny Engagement

18. There has been no overview and scrutiny engagement at this stage.

---

<sup>1</sup> “3) The authority may adopt the document - (b) with the main modifications and additional modifications if the additional modifications (taken together) do not materially affect the policies that would be set out in the document if it was adopted with the main modifications but no other modifications.”

## **Safeguarding Implications**

19. There are no safeguarding implications arising from the proposal

## **Public Health Implications**

20. Planning for sustainable development to meet the employment, housing and infrastructure needs of communities helps foster their wellbeing. Well planned development, including appropriate infrastructure, supports health and well being of local communities, for example through the provision of green infrastructure and infrastructure to encourage walking and cycling as means of travel.

## **Procurement Implications**

21. There are no further procurement implications as a direct result of this proposal.

## **Equalities Impact of the Proposal**

22. The Chippenham Site Allocations Plan aims to positively manage growth and development at Chippenham. The public consultation processes and community involvement has ensured that everyone has had the opportunity to inform the preparation of the Plan.
23. The Plan has been subject to Equalities Assessment which was submitted to the Secretary of State as evidence to support the Plan.

## **Environmental and Climate Change Considerations**

24. Spatial Planning has implications for the natural, economic and social environment. A Sustainability Appraisal incorporating Strategic Environmental Assessment has been undertaken during the preparation of the Plan. The Sustainability Appraisal (SA) has been undertaken iteratively at all stages of preparation and has informed the evolution of the Plan. A Habitat Regulations Assessment has also been undertaken. Both have helped shape the Plan, ensuring that negative environmental impacts are avoided and sustainable development can be delivered. The Inspector concluded at paragraph 146 that the “SA, as amended, has been carried out and is adequate”. The SA is further discussed at paragraphs 29 - 33 of the Inspectors Report. The Inspector also concluded at paragraph 146 that the ‘Habitats Regulations Appropriate Assessment Screening Report, July 2015’ sets out why Appropriate Assessment of proposals of the Plan is not necessary.
25. The final Sustainability Appraisal Report and Habitats Regulations Assessment will be prepared for Council and will published at the time of adoption. The current SA and HRA are available at:  
<http://www.wiltshire.gov.uk/planninganddevelopment/planningpolicy/chippenhamsiteallocationsplan.htm>

## **Risks that may arise if the proposed decision and related work is not taken**

26. Once adopted, the Council can give full weight to the Chippenham Site Allocations Plan in planning decisions in order to deliver sustainable development at Chippenham and provide greater certainty to local communities and the development industry on where and how development should take place.
27. There is a considerable amount of developer interest around Chippenham. This means that the Council is considering applications (and involved in appeals) on the edge of the town on a case by case basis impacting on the Council's ability to plan effectively for growth at the town. Adoption of the Plan will reduce this period of uncertainty, and will also help the Council maintain and demonstrate a five year supply of housing land, in accordance with the requirements of the Government's National Planning Policy Framework, through the identification of sites for development.
28. Rejection of the Inspector's Report at this stage would leave the Council reliant on the wider policies in the Wiltshire Core Strategy and the NPPF when considering major planning applications at Chippenham at a time when the Government has stated its intention (paragraph 14, National Planning Policy Framework) to ensure that there is a presumption in favour of sustainable development in the absence of up to date local planning policies.
29. The Inspector discusses the option of withdrawing the Plan at paragraph 19 of his report concluding:

*"There is no public interest which would be served by the Plan's withdrawal. Indeed it can be argued that the opposite is true: that there is everything to be gained by having a plan in place to address the uncertainty which exists through the absence of an adopted Plan."*

## **Risks that may arise if the proposed decision is taken and actions that will be taken to manage these risks**

30. See legal implications below. At the point of adoption of the Chippenham Site Allocations Plan by Council, there will follow a period of six weeks for legal challenge.
31. In addition Main Modification 37 introduces a section on Risk Management to the Plan and table of risks which will be monitored and managed as the Plan is implemented.

## **Financial Implications**

32. The financial implications of adopting, publishing and meeting future commitments in relation to the Chippenham Site Allocations will need to be met from within existing budget allocations for Economic, Development and Planning budget.

33. Adoption of the Plan will help bring forward new sites for housing, thereby enabling the Council to benefit from the Government's New Homes Bonus and by a contribution to the Council's Council Tax base. In addition, they will be subject to Community Infrastructure Levy that will help deliver specific infrastructure schemes in Chippenham and adjoining parishes.

### **Legal Implications**

34. Once adopted the Chippenham Site Allocations Plan will form part of the statutory development plan for the area and be used as such for the purpose of determining planning applications. Its preparation has involved ensuring compliance with procedural requirements including: duty to cooperate, Sustainability Appraisal and Habitats Regulations Assessment being undertaken at key stages during the preparation of the Plan, and consultation statements summarising how the Council has engaged with communities and other stakeholders during the process. The Inspector considered legal compliance of the Plan at paragraph 146 of his report and concluded:

*“My examination of the compliance of the Plan with the legal requirements is summarised in the table below. I conclude that the Plan meets them all.”*

35. The options open to the Council at this stage in the process are set out in the Planning and Compulsory Purchase Act 2004 (as amended) and the Town and Country Planning (Local Development) England Regulations 2004. If the Council rejects one or more of the Inspector's recommended modifications it cannot then proceed to adopt the Plan.
36. There are legal implications associated with the adoption of the document. These are limited to the potential for judicial challenge in accordance with legislation. Any such challenge would be limited in terms of scope and could only challenge whether a procedural step in the process of preparing the document has been missed or not complied with fully. Wiltshire Council Legal Services have been fully involved throughout the process.
37. Should the Plan be formally adopted by Council, an 'Adoption Statement' will be published in the local press advertising the availability of the Inspector's Report and the adopted Plan. If at this stage anyone wishes to lodge a judicial challenge to the document, they must do so within six weeks of the date it is adopted by the Council.

### **Options Considered**

38. The options open to the Council are limited by the legislation (see legal implications above). The Council can either:
- (i) Adopt the Plan with the modifications recommended by the Inspector; or
  - (ii) Resolve not to adopt the Plan.

In the case of (ii) the Council would need to withdraw the Plan and begin preparation of a new plan that would take a number of years to put in place. This would have repercussions for housing land supply in Chippenham specifically and Wiltshire generally, paving the way for speculative rather than plan led development.

39. As stated above the option of withdrawing the Plan was considered by the Inspector which he rejected as not in the public interest (see paragraph 29, above).

## **Conclusions**

40. The Chippenham Site Allocations Plan has been in preparation over a number of years and involved considerable public consultation with the local community and other stakeholders. It has now reached the final stage in the process and on adoption will have full weight in determining planning applications and provide certainty over how sustainable development can be delivered in Chippenham.

41. The Inspector's Report on the examination into the Plan states at paragraph 148:

*"I conclude that with the recommended main modifications set out in the Appendix the Chippenham Site Allocations Plan satisfies the requirements of Section 20(5) of the 2004 Act and meets the criteria for soundness in the National Planning Policy Framework."*

42. The Council can now formally adopt the Plan in line with the Inspector's recommendations. Adoption of the Plan will provide an up-to-date development plan for Chippenham. This will enable the effective management of development and ensure that homes and jobs are provided at the town in the most sustainable way that maximises benefits for the local community.

## **Alistair Cunningham**

Associate Director for Economic Development and Planning

---

Report Authors:

### **Georgina Clampitt-Dix**

Head of Spatial Planning

### **Carolyn Gibson**

Spatial Planning Manager

06 March 2017

## **Appendices**

**Appendix 1:** Report on the Examination of the Chippenham Site Allocations Plan including list of Main Modifications

**Appendix 2:** Chippenham Site Allocations Plan (as amended)

**Appendix 3:** List of Additional Modifications

## **Background Papers**

None

This page is intentionally left blank





---

# Report to Wiltshire Council

by **Patrick T Whitehead DipTP(Nott) MRTPI**

an Inspector appointed by the Secretary of State for Communities and Local Government

Date 21 February 2017

---

Planning and Compulsory Purchase Act 2004

(as amended)

Section 20

## **Report on the Examination of the CHIPPENHAM SITE ALLOCATIONS PLAN Local Plan**

The Plan was submitted for examination on 31 July 2015

The examination hearings were held between 10 and 11 November 2015  
and between 27 September and 5 October 2016

File Ref: PINS/Y3940/429/10

## Abbreviations used in this report

AA	Appropriate Assessment
AM	Additional Modification
ALC	Agricultural Land Classification
BMVL	Best and Most Versatile Land
CLR	Cocklebury Link Road
CSAP	Chippenham Site Allocations Plan
CWS	County Wildlife Site
DtC	Duty to Co-operate
ELR	Eastern Link Road
HLSS	Housing Land Supply Statement
HRA	Habitats Regulations Assessment
LDS	Local Development Scheme
LP	Local Plan
MM	Main Modification
NPPF	National Planning Policy Framework
NE	Natural England
NWRR	North Wiltshire Rivers Route
PPG	Planning Practice Guidance
PRN	Primary Route Network
SA	Sustainability Appraisal
SCI	Statement of Community Involvement
SRN	Strategic Road Network
SSR	Site Selection Report
SSVA	Strategic Site Viability Assessment
SWLEP	Swindon and Wiltshire Local Enterprise Partnership
SWOT	Strength, Weakness, Opportunity, Threat
TA	Transport Assessment
WC	Wiltshire Council
WCS	Wiltshire Core Strategy
WMS	Written Ministerial Statement
WMF	Wiltshire Monitoring Framework

## **Non-Technical Summary**

This report concludes that the Chippenham Site Allocations Plan provides an appropriate basis for the planning of the town's strategic site allocations, provided that a number of main modifications [MMs] are made to it. Wiltshire Council has specifically requested me to recommend any MMs necessary to enable the Plan to be adopted.

All the MMs concern matters that were discussed at the examination hearings. Following the hearings, the Council prepared schedules of the proposed modifications and carried out sustainability appraisal of them. The MMs were subject to public consultation over a six-week period. In some cases I have amended their detailed wording and added consequential modifications where necessary. I have recommended their inclusion in the Plan after considering all the representations made in response to consultation on them.

The Main Modifications can be summarised as follows:

- The development strategy has been amended to update the housing requirement and include a revised methodology replacing references to first, second and third preferred areas - MMs 5 - 6;
- Policy CH1 and supporting text has been amended to include smaller extension sites and increase the total housing yield for the strategic area – MMs 7 - 17;
- Policy CH2 and supporting text has been amended to clarify the proposals and address concerns with deliverability - MMs 18 - 26; and
- Policy CH3 and supporting text has been deleted in its entirety – MMs 27 - 29.

## Introduction

1. This report contains my assessment of the Chippenham Site Allocations Plan (CSAP) in terms of Section 20(5) of the Planning & Compulsory Purchase Act 2004 (as amended). It considers first whether the Plan's preparation has complied with the duty to co-operate. It then considers whether the Plan is sound and whether it is compliant with the legal requirements. The National Planning Policy Framework (paragraph 182) makes it clear that in order to be sound, a Local Plan should be positively prepared, justified, effective and consistent with national policy.
2. The starting point for the examination is the assumption that the local planning authority has submitted what it considers to be a sound plan. The Chippenham Site Allocations Plan [CSAP/01] submitted in July 2015 is the basis for my examination. It is the same document as was published for consultation in February 2015. The Council proposed changes to the Pre-Submission Draft Plan [CSAP/02] which have subsequently been incorporated in the further proposed changes referred to below. As a consequence of fundamental flaws being identified in the evidence base, the Examination was suspended on 11 November 2015. A revised CSAP [CSAP/14], incorporating further proposed changes [CSAP/11], was submitted to the examination in May 2016.
3. In addition to the consultation on the pre-submission draft CSAP which ran from 23 February to 8 April 2015, representations on the proposed modifications following the period of suspension were sought from 23 May to 5 July 2016. The Council has also consulted on the Proposed Further Modifications arising through the resumed Examination, including the hearing sessions held in September/October 2016, together with the changes proposed to the submission document in July 2015 [CSAP/15]. This consultation ran from 31 October to 12 December 2016. In arriving at my conclusion in this report I have had regard to the representations resulting from all of these consultations.
4. References in square brackets [ ] are to documents forming the supporting information to the submitted draft plan.

## Main Modifications

5. In accordance with section 20(7C) of the 2004 Act the Council requested that I should recommend any main modifications [MMs] necessary to rectify matters that make the Plan unsound and thus incapable of being adopted. My report explains why the recommended MMs, all of which relate to matters that were discussed at the examination hearings, are necessary. The MMs are referenced in bold in the report in the form **MM1**, **MM2**, **MM3** etc, and are set out in full in the Appendix.
6. Following the examination hearings, the Council prepared a schedule of proposed MMs and carried out sustainability appraisal of them. The MM schedule was subject to public consultation for six weeks. I have taken account of the consultation responses in coming to my conclusions in this report and in this light I have made some amendments to the detailed wording of the main modifications and added consequential modifications where these are necessary for consistency or clarity. None of my amendments significantly

alters the content of the modifications as published for consultation or undermines the participatory processes and sustainability appraisal that has been undertaken. Some modifications included in the Council's schedule do not amount to main modifications required to address the soundness of the Plan under Section 20(7C) of the 2004 Act (numbered as MMs 1, 2, 4, 5, 10, 11 and 24 in the schedule) and these are not the subject of recommendations in this report. However they may be considered as Additional Modifications under Section 23(3)(b) of the Act, which provides for the local planning authority to adopt the Plan with additional modifications if (taken together) they do not have a material effect on the policies.

## **Policies Map**

7. The Council must maintain an adopted policies map which illustrates geographically the application of the policies in the adopted development plan. When submitting a local plan for examination, the Council is required to provide a submission policies map showing the changes to the adopted policies map that would result from the proposals in the submitted local plan. In this case, the submission policies map comprises the set of plans identified as the Wiltshire Policies Map as set out in the Wiltshire Core Strategy (WCS).
8. The policies map is not defined in statute as a development plan document and so I do not have the power to recommend main modifications to it. However, a number of the published MMs to the Plan's policies require further corresponding changes to be made to the policies map.
9. These further changes to the policies map will be published in due course.
10. When the Plan is adopted, in order to comply with the legislation and give effect to the Plan's policies, the Council will need to update the adopted policies map to include all the changes proposed in the CSAP and the further changes published alongside the MMs.

## **Assessment of Duty to Co-operate**

11. Section 20(5)(c) of the 2004 Act requires that I consider whether the Council complied with any duty imposed on it by section 33A in respect of the Plan's preparation.
12. The Council has provided a statement on the Duty to Co-operate [CSAP/04] which provides evidence that the Duty has been properly discharged. The statement identifies those prescribed bodies relevant to the CSAP. The statement also indicates that many of the issues where cross boundary cooperation is necessary have "*..already been established throughout the preparation of the Wiltshire Core Strategy..*" [CSAP/04, para 4.4], as detailed in the Inspector's Report [CWCO/07; paras 7 - 10]. These include the scale of growth at Chippenham and its role within the settlement hierarchy. Additionally, it notes that the CSAP area is completely within Wiltshire and does not adjoin any other local authority area. Following suspension of the Examination and completion of the revised CSAP, the Council has continued undertaking constructive engagement with the adjacent authorities and prescribed bodies.

13. There is a strategic relationship with Bath, to the west, and Swindon to the east. Accordingly, these two were the relevant local authorities and there are SoCGs for each [CSOCG/03 & 04], indicating that there are no unresolved issues with Wiltshire Council. So far as the prescribed bodies are concerned, SoCGs [CSOCG/06, 07 & 14] indicate there are no unresolved issues. In respect of Highways England [CSOCG/01] and Historic England [CSOCG/02] small changes to the text of MMs 5, 12 and 31 have been agreed and there are no further unresolved issues. A further SoCG [CSOCG/05] indicates there are no remaining areas of dispute between WC and Swindon and Wiltshire Local Enterprise Partnership.
14. Taking the above into account, overall I am satisfied that where necessary the Council has engaged constructively, actively and on an on-going basis in the preparation of the Plan and the duty to co-operate has therefore been met.

## Assessment of Soundness

### Background

15. The WCS, as submitted for examination in July 2012, included Core Policy 10, which identified 3 strategic site allocations for Chippenham (North Chippenham, Rawlings Green & South West Chippenham) to assist in fulfilling its role as a strategic employment location. The Inspector's report of that examination, dated December 2014, [CWCO/07] found that "*in the absence of a sufficiently robust SA, I have insufficient evidence upon which to base a recommendation as to which sites should be developed through until 2026*" (para 2.32). Accordingly, the sites were removed from CP10 in order that the detailed delivery of development within the town and affected areas could be considered robustly through a specific Site Allocations Plan. The submitted CSAP is intended to fulfil that purpose.
16. As indicated in para 2, my initial appraisal and early hearing sessions identified fundamental flaws in the evidence base, in particular the Site Selection Report (SSR) and the Sustainability Appraisal (SA), together with delivery issues concerning the chosen strategy. Consequently the Examination was suspended on 11 November 2015. To be clear, I had not at that time found the submitted Plan unsound: indeed, I had not reached any conclusions regarding soundness. A revised CSAP [CSAP/14], incorporating further proposed changes [CSAP/11], was prepared and the examination resumed in May 2016. The revised Plan is supported by a revised evidence base.
17. There are two significant differences between the submitted Plan and the revised version. The first is the deletion of the 91ha of land forming the East Chippenham strategic site, intended to deliver 850 dwellings and 5 ha of employment land, together with completion of the Eastern Link Road (ELR) from the eastern boundary of the Rawlings Green site to the A4 to the east of Stanley Lane. The second difference is the inclusion of three smaller sites, totalling 11 ha, to provide for up to an additional 400 dwellings, within the South West Chippenham strategic site.

### Consideration of withdrawal

18. There have been suggestions that the resubmitted CSAP has changed so significantly that it should be withdrawn. These are based on the advice in the

Government's PPG, para 024, ref ID: 12-024-20140306, which states that "*..where changes recommended by the Inspector would be so extensive as to require a virtual re-writing of the plan, the Inspector is likely to suggest that the local planning authority withdraws the plan*". It has been suggested that the changes proposed are not only extensive but also significantly different in qualitative terms, whilst the chosen strategy has been replaced by a different strategy. These criticisms have not been accepted for the following reasons:

- the CSAP's single identified purpose – to identify large mixed-use sites at Chippenham – remains intact [CSAP/14, para 2.1];
- it continues to fulfil that purpose in accordance with the overarching policies of the WCS, specifically Core Policy 10;
- the Chippenham Vision and the objectives derived from the WCS remain the same [CSAP/14, paras 3.3 – 3.12];
- the single essential difference between the submitted document [CSAP/02] and the revised version [CSAP/14] lies in the spatial distribution of the strategic sites.

19. There is no public interest which would be served by the Plan's withdrawal. Indeed it can be argued that the opposite is true: that there is everything to be gained by having a plan in place to address the uncertainty which exists through the absence of an adopted Plan. For all of these reasons I have not requested that the Council withdraws the Plan and there is no substantive evidence before the Examination to persuade me otherwise.

## **Main Issues**

20. Taking account of all the representations, the written evidence and the discussions that took place at the examination hearings I have identified 8 main issues upon which the soundness of the Plan depends. Under these headings my report deals with the main matters of soundness rather than responding to every point raised by representors.

### **Issue 1 – Is the revised Plan supported by an adequate, up-to-date, relevant and proportionate evidence base?**

21. The revisions to the evidence base are intended to address the identified shortcoming which led to suspension of the Examination so the first issue to be considered is whether the exercise has been successful. These revisions include:

- an enhanced methodology for the SSR [CSAP/12 & CSAP/13];
- a revised SA [CSUS/11-16];
- a revised Strategic Site Viability Assessment (SSVA) [CEPS/17c];
- supplementary Transport & Accessibility evidence [CEPS/04a & 05a];

- a Transport Strategy Refresh [CTAN/14];
- a Riverside Country Park Report [CEPS/19a]

### *The Site Selection Report Enhanced Methodology*

22. There were two fundamental concerns regarding the adequacy of the SSR which accompanied the Submission Plan. The first was the use of a ranking exercise relating to the criteria set down in WCS Core Policy 10 which sought to provide guidance for the site allocations in the CSAP. The criteria were not ranked in the WCS and the basis for the ranking exercise undertaken in the SSR was not clear and neither was there a clear indication of how the ranking influenced the final choices.
23. The second concern was the 2 stage approach to identifying, firstly, broad strategic areas and secondly specific locations within those areas to allocate for development. This resulted in some locations not being evaluated in the same detail as others before being rejected. The basis for the first stage exercise was a narrative approach which did not give confidence that those areas rejected in the first round had been subject to a robust evaluation.
24. The response from the Council was to develop an enhanced methodology which removed the two stage approach to site identification, replacing it with a parallel assessment of strategic areas and strategic sites, culminating in the comparison of alternative development strategies. The ranking of criteria was removed and replaced with an employment-led approach, following the strategy for Chippenham set down in the WCS (para 5.46) and the priority for new employment provision identified in WCS, para 5.48.
25. The revised SSR also undertook a policy review of the Strategic Area Assessments against the six WCS Core Policy 10 criteria using a SWOT (Strength, Weakness, Opportunity, Threat) appraisal. The appraisal replaces the narrative approach with a more consistent and equitable basis for considering each alternative strategic area and alternative strategic site option.
26. The review of the SSR has ensured that all reasonable alternative strategic site options have been included in addition to those already examined. This includes site options in Strategic Areas A and D, together with additional options in Strategic Areas E, B and C.
27. Doubts were expressed at the hearings that the revised SSR had fully addressed the concerns raised over the original submission. These centred largely on the omission of some site options and the premature rejection of others. I have given consideration to individual omission sites at paras 132 - 145, below. However, the purpose of the CSAP is to identify "...large mixed use sites for businesses, new homes and infrastructure.." [CSAP/14, para 1.2]. In general, the consideration of smaller sites would not assist in achieving this purpose. The strategy for the Chippenham area, set down in the WCS, para 5.46, requires that the employment sites "...will form part of mixed use urban extensions...that are well integrated with the town". With this in mind, site options removed from the urban periphery, or without a "...reasonable prospect of planned infrastructure being delivered in a timely



*fashion" [NPPF, para 177] will inevitably be viewed less favourably to those site options contiguous with the urban boundary.*

28. Overall, I am satisfied that the revised approach provides a focussed, thorough and robust appraisal which has successfully addressed the concerns raised prior to suspension of the Examination. The overall conclusion of the SSR, taken together with the SA, is the rejection of the Submitted Strategy in favour of a Mixed Strategy [CSAP/12, para 8.88]. Para 8.89 indicates that the chosen strategy carries the least risk in terms of site specific and generic risks compared to three alternative strategies under consideration [CSAP/13, Appendix 7].

#### *The Sustainability Appraisal*

29. The SA must "*..consider all reasonable alternatives and assess them in the same level of detail as the option the plan-maker proposes to take forward in the Local Plan*". [PPG, para 018 ID: 11-018-20140306]. The SA was subject to detailed examination at the first hearings and was found to be inadequate. The main reason for this was that, like the SSR, it followed a two stage process with only three broad areas taken forward for detailed assessment of locations for development within them. However, in many cases, the differences in performance between the five areas under consideration against the 12 identified SA objectives were unsubstantial to the extent that there was little discernible difference. As a consequence sites which may well have scored highly in the second stage were not taken forward for appraisal.
30. The SA has been updated and supplemented with further work. It assesses a larger set of strategic sites options together with alternative and preferred development strategies. In general terms it has addressed the criticisms of the original report in terms of fairness or even-handedness, and proportionality. In arriving at this conclusion I have noted the judgement in the case of Ashdown Forest Economic Development LLP v SoSCLG [2014] referred to in the Legal Topic Paper [CSUS/18] which indicates that the Local Planning Authority (LPA) has "*..a substantial area of discretion as to the extent of the inquiries which need to be carried out to identify the reasonable alternatives..*".
31. Two specific criticisms concerning the revised SA were raised at the resumed hearings. The first related to the level of detail which it would be reasonable to expect the SA to consider, the specific point being that detailed information on the subdivision of Grade 3 BMVL into 3a and 3b should be used where available. Evidence was provided showing that for some sites this information would be readily available, but not for all sites as the agricultural land classification (ALC) maps do not subdivide Grade 3. However, para 018 of the PPG stresses that the alternatives should be assessed in the same level of detail as the preferred option, whilst the judgement in the case of Ashdown refers to the necessary balance between putting a plan in place with reasonable speed and the objective of gathering relevant evidence. The exercise involved in gathering data to provide the same level of BMVL detail to allow for an equitable comparison of all alternatives would unnecessarily delay the plan process in this instance.

32. The second specific criticism concerned the treatment of one site option – A1. This was assessed as likely to have a major adverse effect against SA objective 1 concerning the protection and enhancement of biodiversity indicating that it may be inappropriate for mixed-use development. As the only site option to receive a red box against this objective, it was thought to be unfairly excluded from further consideration. The accompanying text indicates that the SA concern is the cumulative effects of development of this site together with the adjacent permitted development at North Chippenham, and that mitigation is not considered possible. As a consequence the site was not taken forward into the preferred strategy. This is not evidence that the revised SA is fatally flawed or that the site in question has been unfairly treated. However, the site is considered further as an omission site (paras 135 - 136).
33. The revised SA has been criticised for not properly considering reasonable alternatives. In addition to the site at Barrow Farm (A1), these include Strategic Site Options D1 based around Forest Farm, E6 south of Showell Nursery site and Gate Farm in isolation (other than as part of a wider East Chippenham site). These do not raise fundamental issues with the approach to the SA: rather the sites' promoters consider them to be reasonable alternatives to the preferred option. My conclusion is that the revised SA has provided an adequate response to the criticisms.

#### *Strategic Site Viability Assessment*

34. Whilst the SSR and SA were the most significant areas of concern regarding the evidence base, the SSVA [CEPS/17 & 17a,b and c] was also the subject of criticism. The SSVA analysis used benchmark land values based on research carried out in 2011 for the Department for Communities and Local Government. The conclusion [CEPS/17 para 7.1.3] was that "*..with the exception of South West Chippenham the (strategic) sites do not currently support a policy compliant level of affordable housing*". Looking at the detail, even at the lower range of gross site values (£0.250m per hectare), North and East Chippenham, and Rawlings Green were unable to support more than 30% affordable housing. At the higher gross site value (£0.350m per hectare) none of the three sites would support more than 20%. Taken at face value, on the basis of the SSVA conclusions, it was clear that only South West Chippenham could be said to be compliant with WCS Core Policy CP43: Providing Affordable Homes.
35. A revised SSVA [CEPS/17a] was submitted just prior to the first hearing sessions which stated that note had been taken of the initial appraisal and the Council's response [EX/2]. It showed that all of the strategic allocations would be viable with a 40% proportion of affordable housing. The revised document was submitted *ex post facto* and contrasts with the experience with the Area A S106 negotiations which have resulted in no more than 20% affordable housing being achievable.
36. The matter is of concern since the WCS requires that approximately 13,000 affordable homes are delivered within the Plan period. Chippenham Town is within the 40% zone identified by WCS Core Policy 43 as intended to provide a significant proportion of those affordable dwellings. If the allocated strategic sites cannot be developed viably, then the "*..clear and robust policy*

*framework..*" referred to in the WCS (para 6.42) cannot be delivered in respect of a key location for the delivery of affordable housing.

37. The PPG (para 005) advises that viability assessment can be a tool to assist with the development of plans by ensuring that the plan vision and policies are realistic. The assessment should provide a high level assurance that the plan policies are viable whilst it also suggests the testing of policies should be iterative and that the evidence should be proportionate.
38. In April 2016 the SSVA was updated and extended [CEPS/17b] providing an assessment of 6 strategic sites in total (B1, C1, C4, D7, E2 and E5) using industry standard residual valuation approaches. It provides the high level assessment of general viability of proposals in plan making. The report was further updated in June 2016 [CEPS/17c] as a result of errors in the estimates for strategic transport links. The results have been subject to sensitivity analysis showing that the strategic sites considered for inclusion in the revised CSAP remain viable if sales values decrease by 5%, benchmarked against at the lower end of the CLG range.
39. There have been concerns that the costs of a railway bridge giving access to the Rawlings Green site were significantly under-estimated. These are contained within the costs for strategic transport links which were indicated to be £5.19m in Table 4.7.1 [CEPS/17 & 17a] but have been recalculated in more detailed estimates to be £3.13m in Table 1.1.1 [CEPS/17c]. These revised calculations were the subject of discussion at the hearings.
40. The Government's PPG, particularly para 005 (ID 10-005-20140306), indicates an iterative approach to development plan policies. The advice states that evidence should be proportionate to ensure plans are "*..underpinned by a broad understanding of viability*". The updated assessment uses an industry standard residual approach to test the impact of the Council's policies on site viability. However the report recognises the limitations of the assessment and advises that residual valuations can only ever serve as a guide. Nevertheless, I am satisfied that the updated SSVA provides a satisfactory basis for assessing the viability of the potential strategic sites.

#### *Transport and Accessibility evidence*

41. Following the suspension of the Examination supplementary transport and accessibility evidence was presented in two reports: Part 1a – Assessing Strategic Site Options [CEPS/04a] and Part 2a – Assessing Alternative Strategies [CEPS/05a]. The purpose of these was to align the transport evidence with the revised SA and SSR methodologies, with Part 1a assessing the transport and accessibility attributes of 14 Strategic Site Options and Part 2a assessing the 4 alternative Development Strategies.
42. Part 1a uses the same key themes and '*heat map*' method as in the original Part 1 assessment [CEPS/04]. There have been detailed criticisms of the method in terms of the 6 locations chosen to assess accessibility, for example the use of the Community Hospital as a proxy for health services and the omission of leisure as a location. However, the assessment is part of the wider assessment contained in the SA and SSR. It is also a comparison exercise which seeks to show the transport and accessibility attributes of each site in terms of the 3 key themes.

43. Turning to Part 2a which is concerned with the alternative development strategies, the summary of findings [CEPS/05a paras 4.1 – 4.6 and Table 4-1] indicates that Development Strategies 1 (Eastern), 2 (Southern) and 3 (Submitted) are likely to be "...unacceptable in the absence of a completed link road.." (para 4.3). However, it also indicates that Strategy 4 (Mixed) does not provide an opportunity to complete either an Eastern or Southern Link Road and that "...mitigating the traffic impacts of development would be more challenging" so that, overall, "...a strategy that includes an Eastern Link Road remains preferable in terms of highway network performance" (Para 4.5 – 4.6). Again, there were criticisms of the approach, including those concerned with the impact of development at Rowden Park on the historic village of Lacock (para 65, below). However, in this context the SSR (CSAP/12 para 8.21) indicates that the Southern Link Road Strategy could potentially result in some poor traffic impacts on the local network.
44. The transport evidence has been further strengthened with the submission of the Chippenham Transport Strategy Refresh 2016 [CTRAN/14]. The document provides 8 objectives for which strategy schemes are identified. There have been questions regarding the output from the S-Paramics Transport Model that was used to forecast the impacts of the transport strategy, particularly concerning the level of detail – or lack of – regarding actual flows. The counter-argument, that the model output contained the usual level of detail for policy making where there is no exact land use data, is persuasive since the use of data with a spurious level of detail is clearly of no benefit.
45. In general terms, there has been criticism of the transport and accessibility evidence particularly in terms of the level of detail, traffic impacts and the workability of the transport strategy. However, the exercise undertaken was a comparison of alternatives appropriate in its scope and level of detail. Through the use of an iterative process, it sought to identify a preferred development strategy in a manner proportionate to the requirements of a site allocations plan.

#### *Riverside Country Park Report*

46. Policy CH4 in the Submission Plan delegated much of the detailed matters regarding future management of Country Parks to a masterplan process, and to a management plan to be approved by the Council. Although para 5.33 indicated that the "*long term management of the country parks will be secured by planning obligation relating to individual sites*" no detailed information was provided. This was a matter requiring some clarification. A report of the future management of the riverside country parks has been now prepared jointly by Wiltshire Council and Natural England [CEPS/19a] which considers the future management options available for the provision of country parks, including matters relating to governance and ownership. Its production involved relevant organisations with a potential interest in the ownership and future management of the Country Parks and included detailed consideration of governance options and opportunities for income generation. Overall, the report fulfils the need for a framework for delivery of the Country Parks and a context for the development of masterplans.

### *Conclusion and Recommendation*

47. Considerable additional work has been undertaken by the Council to meet the shortcomings identified in the evidence base which underpinned the Submission Plan. My conclusion is that this has resulted in an adequate, relevant and proportionate evidence base which supports and provides a basis for justification of the proposals and policies contained in the revised Plan. As a consequence of the revised evidence base it has been necessary to substantially revise the methodology section of the Plan to describe the process through which the strategic areas for development have been chosen. Accordingly, in order to be found sound as a basis for justifying the policies and proposals in the Plan it is necessary for the text in paras 4.10 to 4.24 to be amended as provided for in **(MM5)**, and for a new diagram 1 to be inserted to show the new Plan Preparation Steps. As a consequence of the revised process through which allocations were chosen, it is necessary to replace figure 4.1 showing the proposed allocations for inclusion in the Plan **(MM6)**.

### **Issue 2 – Has the revised Plan correctly identified the housing and employment land requirement?**

#### *The Housing Requirement*

48. The WCS, CP10, identified a requirement for at least 4,510 homes to be built at Chippenham by 2026, with a residual land requirement for 2,625 new homes to be found through the CSAP. The Submission CSAP updated that figure as a result of completions, planning permissions and commitments to 1,935 homes. As a consequence of the suspension of the Examination Table 4.1 requires a further update to take account of later HLSS information to show a residual requirement of at least 1,780 homes.
49. I have noted the revised table is based on figures for land supply at April 2015. The LPA has since produced a Housing Land Supply Statement for April 2016, published in November, which indicates a lower residual requirement for Chippenham at 1,661 dwellings and amended trajectories for the North Chippenham and Hunters Moon sites. However, the difference is small and results in a marginal allowance for flexibility within the Plan period.
50. There have been suggestions that the allocation of two strategic sites totalling 2,050 homes represents an 'overprovision'. However, this is not a substantial addition to the residual requirement, and it can be readily justified as an allowance for flexibility.
51. On the contrary argument, that insufficient land has been provided, the Courts have established that the NPPF does not require a site allocations plan to also question whether further housing provision will need to be made: that is the role of the WCS through review. Accordingly I have accepted that the figure of 'at least 1,780' homes is the appropriate requirement for this Plan. Nevertheless, to be considered properly justified, the strategic site allocations must be derived from a current appraisal of the residual requirement. However, the data for housing land supply underpinning the residual housing requirement in the submitted plan had been published in July 2014. Additionally there was no reference to brownfield opportunities, most

importantly proposals at Langley Park (para 52, below). Accordingly, it is necessary to provide amended text at paras 4.3 (**MM3**) to ensure clarity and at para 4.4 (**MM4**) ensuring that this section of the Plan has been positively prepared.

#### *Brownfield sites*

52. It has been suggested that an overprovision of greenfield sites is not necessary when brownfield sites could provide for some capacity. Para 4.3 of the CSAP, as modified by MM3, indicates that figures for housing supply take account of brownfield sites included in Policy Core Policy 9 of the WCS and the Chippenham Central Area Master Plan: specifically including Langley Park. The Langley Park site has been granted outline planning permission - 16/03515/OUT, to include the provision of 'up to 400 residential units'. Within this context, a full permission has been granted to provide 22 residential units -16/04273/FUL. At the time of writing, both of these are subject to the signing of S106 agreements. However, the Council has reported that proposals for the redevelopment go back some 15 years and, whilst an allowance has been included in CSAP for 250 units to be achieved here, delivery cannot be guaranteed. Whilst the Council reports that windfall permissions and completions are likely to show an increase across Wiltshire as a whole [CHSG/08, Appendix 5], historically the delivery of brownfield development has contributed very small amounts in Chippenham.
53. The advice in the NPPF, para 48, is that LPAs may make an allowance for windfall sites provided there is compelling evidence that they consistently become available and continue to provide a reliable source of supply. The SSR provides details of brownfield sites which had been referred to as offering potential for housing, but concludes that this source of supply has been shown to be unpredictable and so no deduction has been made to the residual housing requirement (para 24). There is, therefore, no compelling evidence in the case of the Chippenham local area, and the Council is right to take a conservative view of the likely contribution to be achieved in the Plan period.

#### *Employment Land*

54. WCS Core Policy 10 also identified a requirement for approximately 26.5 hectares of employment land to be found through the CSAP. The employment land is to be allocated alongside the housing land as part of large mixed use sites. The latest update on the employment land requirement, shown at Table 4.2, suggests a figure of 21.5 hectares remains to be found through the CSAP. The strategy for Chippenham is based on delivering significant job growth in order to improve the town's self-containment so the identification of strategic mixed-use sites is a key consideration of the Plan.

#### *Conclusion and Recommendation*

55. On this issue, it is clear that following the period of suspension it would be necessary to update the housing and employment land requirements. It would also be necessary to consider the implications of any changes for the development strategy to ensure that the Plan is positively prepared. In addition to the amendments to paras 4.3-4.4 (**MMs 3 and 4**) the Council has undertaken to update the information contained in the Plan particularly at tables 4.1 and 4.2 on adoption through the use of additional modifications.

### Issue 3 – Policy CH1 South West Chippenham allocation

56. The South West Chippenham allocation (Policy CH1), as originally proposed in the Submission Plan, was for 1,000 dwellings and 18ha of employment land. Following the preparation of the enhanced methodology the allocation for the Rowden Park site has been retained as before, although the indicative plan (Figure 5.1) no longer shows a separate employment site to the west of the B4520 as befits a mixed-use allocation. However, 3 smaller extension sites totalling approximately 11ha of land for a total of up to 400 dwellings have been added to Policy CH1, bringing the total development potential for the site to around 1,400 dwellings.
57. The assessment results for Area E, which includes the South West Chippenham allocation, indicate that development here would support the socio-economic objectives relating to housing and would provide for long-term sustainable growth. The only constraint deemed problematic to mitigate is the extent of BMVL land in the area; other environmental matters are deemed achievable to mitigate. There is sufficient developable land within Flood Zone 1, and the area has good access to the A350, to the town centre and to employment areas. The SRR (para 2.18) indicates that, in relation to the primary objective of the Plan – to provide new employment provision in Chippenham - Area E offers the possibility of immediate access to the A350 in a location attractive to investment.
58. There are a number of issues to be addressed relating to the revised allocation which can largely be categorised as:
- The additional allocation is unjustified;
  - concern with additional traffic, particularly on the B4528 and, potentially, on Lacock and Lackham;
  - insufficient weight given to cultural heritage and
  - the potential to increase flood risk.

#### *Justification for the additional allocation*

59. The additional allocation comes through the identification of three smaller sites contiguous with the boundary of the main Rowden Park site, including Showell Nurseries – a brownfield site identified for redevelopment. The three sites were included within Option E5, an option assessed as not encroaching too far into the surrounding countryside and making the best use of available land (SSR, para 5.67). Consideration of the justification for additional land has to be related to the deletion of Policy CH3 East Chippenham allocation resulting in a reduction of 850 dwellings from the total allocations. Although the revised residual requirement shown in Table 4.1 shows a reduction from previous calculations, without additional land for housing there would be a shortfall on the total requirement.
60. The Council's Position Statement for Resumed Matter 6 [RM/6] sets out a number of strengths associated with the extended allocation. These include,

for example, the re-use of previously developed land (the Showell Nursery site), the inclusion of land enveloped by development which will become part of the urban area of Chippenham, and that there are no significant complications to the delivery in terms of infrastructure. The addition of further housing as part of the South West Chippenham allocation will ensure a supply of deliverable land in a sustainable location. In terms of viability, South West Chippenham (Option E5) remains viable with 40% affordable housing adopting a Benchmark at either the upper or lower CLG range and is robust when subject to sensitivity testing [CEPS/17c].

61. The extended Policy CH1 allocation has resulted in the need for amendments to the wording of the Policy, and the supporting text in order for the Plan to be considered as positively prepared and effective. The Council has continued negotiation with the promoters of the main Rowden Park site, reaching agreement [CSOCG/08] to some changes of wording to Policy CH1 to clarify the nature of the proposals **(MM7)** and to the text of para 5.1 **(MM9)**. Other matters include the importance of dealing with environmental issues arising from the location of the Patterdown Rifle Range within the allocated site, and ensuring that development proposals take account of the importance of the mature network of hedgerows and trees. There is agreement between the parties regarding the necessary amendments to the text at para 5.3 **(MM11)**. With these modifications the Plan is sound with regard to the additional extension sites.

#### *Traffic concerns*

62. There has been concern that development at South West Chippenham would have an adverse impact on the road network through increased traffic, particularly at peak times. It is, of course, inescapable that substantial amounts of development, as committed by WCS, Core Policy 10, will have a traffic impact on Chippenham wherever that development is located. So far as the South West Chippenham allocation is concerned, there are 3 aspects to the impact which can be considered separately.
63. Firstly, the Supplementary Transport and Accessibility Evidence, Part 1a [CEPS/04a], Fig 6-1 shows that, in terms of accessibility, site option E5 demonstrates strong potential in all three attributes assessed (sustainable access, highway access and wider transport opportunities). It does, however, highlight a weakness being the distance from secondary schools. The Council recognises the problem and has agreed a bus strategy at planning application stage where school travel arrangements will be agreed [Position Statement RM/6, para 2.12]. This follows the SSR assessment, para 5.60, indicating that due to the strategic location and scale of the site, there is a strong opportunity to develop and improve the current public transport network.
64. Secondly, transport model evidence [CEPS/05], forecasts that, increasing the number of dwellings from 800 to 1,200, would lead to an almost 20% increase in morning peak hour average journey times, with average journey times in 2026 almost double current average journey times. The highway network performance is forecast to deteriorate most around the town centre and the area immediately to the west (Table 3-1). The impact on journey times is clearly unacceptable and the Plan cannot be considered positively prepared and effective unless there is a clear indication of measures to



prevent it happening. There have been revisions to the Chippenham Transport Strategy [*"the Transport Strategy Refresh 2016"*: CTRAN/14] as a consequence and a number of measures including capacity improvements, public transport improvements and improvements to cycling and pedestrian links are proposed. The need for these is identified in a revised para 3.6 (MM2). To address the specific problem of developing beyond 800 dwellings at South West Chippenham it is necessary to amend the text of Policy CH1 at bullet 7, to include a requirement for a set of comprehensive transport improvement measures if the Link Road from the A350 to Cocklebury Road is not open for use (MM7). These modifications will ensure that the Plan has been positively prepared and therefore sound in this respect.

65. The third issue concerns potential impact, in terms of traffic implications for the village of Lacock. It is an historic village and locally it is said to be experiencing increased traffic arising from 'rat running' to avoid congested roads. Traffic has increased universally in recent years and no evidence has been provided to suggest that Lacock has suffered more than other villages, or that any increase has arisen from drivers diverting through the village. However, the village is located outside the plan area for the CSAP and the Transport Briefing Note 4 [CTAN/07] provides a diagram of the model network coverage extending as far as the A350 to the south (figure 1). The Position Statement [RM/6] shows an increase to 2026 over current flows of around 6% on the A350 (para 4.7). However, if there is an increasing impact on the village, this will be a matter for network management. It is not a matter for the CSAP to address and no modification is necessary for soundness.

#### *Cultural heritage*

66. Evidence Paper 7: Heritage Assets [CEPS/11] considers the land south east of Chippenham as Site 3 and provides a thorough assessment of the potential impact of development on known and unknown archaeology, Conservation Areas and Listed Buildings, Registered Parks and Gardens and historic houses and farmsteads. Importantly, it summarises the sensitivities and identifies a high risk of impacts to the historic environment and unknown archaeology and lists required mitigation measures.
67. Some of the mitigation measures relate to matters which would properly be considered at application stage, but the important findings for this Plan are that there should be no development in the immediate vicinity of Rowden Farm, a substantial green buffer along the River Avon corridor and a significant reduction in the extent of the site's southern boundary. In general terms these concerns have been addressed through the proposals included in Policy CH1. These include protection afforded to the Rowden Park Conservation Area, the setting of the Listed Buildings, and the medieval moated site and fishponds Scheduled Monument by the designation of a substantial area of riverside country park and detailed requirements to be developed through the masterplan.
68. The proposed additional site at Showell Nurseries extends the southern boundary of the proposed development but it does provide an opportunity to redevelop a brownfield site and replace extensive derelict greenhouses. The nurseries are partly visible from the entrance drive leading from the A350 to

Lackham College but the southern boundary hedgeline of the nursery site has the potential to be strengthened to mitigate the visual impact of development.

69. Overall the evidence indicates that sufficient regard has been given to the heritage assets. Furthermore it does not support a case for removing the smaller sites on the grounds of impact on heritage assets. An amendment to Policy CH1 was included in the pre-submission changes [CSAP/02] to clarify how new development should best preserve the importance of the conservation area. However, for the Plan to be effective, a further clarification is required to ensure that account is taken of the importance of the landscape setting to the Rowden Park Conservation Area. This is provided by a change to para 5.5 (**MM12**) ensuring soundness.

#### *Flood risk*

70. Evidence Paper 6 [CEPS/10] gave consideration to flood risk in respect of Area E (paras 4.32-4.34). Whilst it concludes that some of Area E has the highest propensity to groundwater flooding, much of this is close to the River Avon where development is not proposed. It also indicates that the drainage effect on downstream settlements could be significant so there would be a need for developments to mimic the greenfield runoff state or improve on it. In addition to modifications to the section on master plans [CSAP/14 para 4.23] provided by **MM5**, for the Plan to be effective it must ensure that the significance of designated groundwater Source Protection Zones is recognised, that network improvements are put in place and that the delivery of sustainable drainage measures is ensured. As a consequence of agreement with the Environment Agency [CSOAG/07] a modification to para 5.10 specific to the Policy CH1 allocation (**MM17**) ensures soundness in respect of flood risk in relation to the Rowden Park allocation.

#### *Conclusion and Recommendation*

71. From the above, there are a number of matters regarding Policy CH1 and its supporting text which require main modifications for soundness reasons. These are: amended text at para 4.18 amending the allocation (**MM5**); amendments to the Policy text to take account of various changes, notably the 3 additional smaller extension sites (**MM7**); replacement of figure 5.1 (**MM8**); and amended supporting text at paras 5.1-5.10, describing the development, clarifying the requirements, and clarifying the situation regarding flood risk (**MMs 9 – 17**). With all of these modifications in place the Policy meets the requirements for effectiveness and positive preparation.

#### **Issue 4 – Policy CH2 Rawlings Green allocation**

72. There are a significant number of concerns with the allocation of Rawlings Green as a mixed-use strategic site in the Submitted Plan. In addition to concerns with the amount of development proposed by the Plan as a whole, the scale of development proposed by Policy CH2 has been an issue in contention, particularly concerning those living near to the site, for example at Monkton Park, or in locations perceived to be subject to impact from the development, for example at Langley Burrell. The following specific concerns form the basis for my consideration of the allocation:

- visual impact, including impact on the surrounding landscape and the separation between Chippenham and Langley Burrell and Tytherton Lucas;
  - traffic implications of the proposals, particularly the potential congestion resulting from the Cocklebury Link Road and the use of Darcy Close for access;
  - agricultural land quality;
  - the potential for increased flooding north of the town centre;
  - deliverability of the proposals reliant on the provision of a rail bridge.
73. The revised Plan retains the allocation in substantially the same form, including the requirement for 650 dwellings, 5 ha of employment land and a 2 Form Entry primary school. The supporting text is also retained with some amendments designed to provide clarity and increased justification. The anticipated delivery of housing remains unchanged (Table 6.1). A recent outline planning application (15/12351/OUT) was submitted for up to 700 dwellings. Whilst the Council has resolved to grant permission subject to a S106 agreement being completed within 6 months, the total number of dwellings has not been challenged. However, for reasons set out below the higher total has resulted in an illustrative plan which raises serious concerns with regard to the ability of the development scheme to meet the Policy requirements in CH2 and para 5.12 which were based on the total of 650. The Planning application was subsequently reconsidered at a meeting in December when it was resolved to defer determination pending the receipt of this report, amongst other information.
74. For the most part, the concerns raised to the submitted Plan have not been satisfied and some concerns regarding the Strategic Site remain. I shall deal with these in turn but first, it is important to consider the location of Rawlings Green in the context of the strategy identified by the WCS for the Chippenham area [CWCS/01, paras 5.46-47] which seeks to provide a sustainable distribution of employment sites in the form mixed use urban extensions, including housing, "*..that are well integrated with the town*". There can be no doubt that Rawlings Green fulfils these requirements, particularly in terms of its proximity to the town centre, railway station and other sources of employment. It is against this that outstanding concerns must be considered.

#### *Visual impact*

75. The visual prominence of the site is not in dispute and it is agreed by those promoting development that there will be a requirement for the provision of a landscape framework to mitigate the site's visual impact on the wider landscape [CSOCG/09, para 4.31]. The SSR (para 5.23), refers to the area's high visual prominence and concludes that development here is "*..likely to make the urban edge of Chippenham more prominent in the wider landscape*". However, it also suggests that, in the wider landscape, the area south of Peckingell Farm is marginally less sensitive in landscape terms. In contrast, the landscape assessment carried out for the WCS [CLAN/01] suggested that "*all of the land at Rawlings Farm is considered to have high visual significance*".

*within the wider river corridor*" (p13), although the report indicated that the extreme western corner of the site, west of Cocklebury Lane, below the rolling ridgeline in a north west direction is an exception to this finding. Amongst the *'qualities to be safeguarded'*, fig 13 of the Landscape Assessment [CEPS/07] indicates the separation to Tytherton Lucas as important. There are also heritage assets in the form of 3 Grade II Listed Buildings within or close to the Strategic Site.

76. From my own observations I share the concerns of those who see development at Rawlings Green as a potential threat to the visual qualities of the wider landscape. Most significant of these concerns are: the visual separation of the urban edge of Chippenham from Peckingell Farm and Tytherton Lucas to the north-east and the visual impact of development on the more open landscape of the river valley and more distant views to the east. It is within these areas that mitigation of the landscape and visual effects of development would be difficult – as acknowledged by the SSR (Appendix 6).
77. Policy CH2, bullet point 5, recognises these concerns with a requirement for strategic landscaping and open space. This is supported by text at para 5.12, together with detailed requirements for the strategic landscape scheme. It is, however necessary, in order for the Plan to be effective, to provide a link from the Policy statement to these detailed requirements by an addition to Policy CH2 **(MM18)**.
78. Equally important to the effectiveness of the Plan, the indicative plan (fig 5.2) shows areas for Country Park under Policy CH4 to the north-east and east of the strategic site to meet the requirement set down in bullet point 6 of the Policy. The area to the north-east would provide a substantial visual buffer between the developed area and Peckingell Farm. However, the illustrative plan which accompanied the application for outline permission (15/12351/OUT) shows significant erosion of the buffer with proposals for employment and residential developments. This would be contrary to the spirit and purpose of the Policy requirements, and the need for the development to *"...have appropriate regard to the setting of Langley Burrell and Tytherton Lucas conservation areas..."*. Also of significance in this context is the indication on fig 5.2 of a narrow strip along the western bank of the River Avon which, taken at face value, would not provide an adequate space to mitigate the visual impact of development on the wider, more open landscape to the east of the River and towards Tytherton Lucas.
79. In order to answer these criticisms, and address the consequent soundness issues, it is necessary to amend the text of the 6<sup>th</sup> bullet point in Policy CH2 to reinforce the need to protect the open character of these areas and link the Policy to Fig 5.2. It is also necessary to expand the text of Policy point 5 to link the requirement to the more detailed requirements set down in para 5.12 and to make specific reference to the impact of development on the exposed valley slopes **(MM21)**. Lastly, it is necessary to amend Fig 5.2 to provide a clear definition of the north-eastern boundary to the proposed area for built development – to include the land within the proposed Cocklebury Link Road, and to redefine the eastern boundary of development so that land up to the 50m contour is within the area defined for Country Park **(MM19)**.

### *Traffic implications*

80. Concerns regarding the traffic implications of the development can be considered in terms of the potential impact of traffic using the Cocklebury Link Road, together with the implications of not completing the link from the B4069 to the A350 in a western direction, and issues related to provision of the rail bridge. This latter point will be considered in respect of the impact on delivery of the full development.
81. The SWOT assessment identifies a 'threat' for Area B, Rawlings Green, in terms of congestion or delay until a link road to the A350 is completed and therefore a dependency on development taking place in Area A – although in the Strategic Area Dependency Table of the SSR this is noted as 'partial', defined in para 2.10 as implying that "***much of the Strategic Area is likely to be dependent on development taking place in another Strategic Area***" (my emphasis). Whilst the level of assessment is high, the need to co-ordinate provision of road infrastructure is identified. The report also comments that "*Without this connection, nearly all traffic to or from Strategic Area B would need to route via Cocklebury Road and the town centre in order to connect with the PRN*". Additionally, the SSR notes (para 2.11) that the degree to which the development is able to afford the necessary infrastructure and provide for all other costs including a proportion of affordable housing "*..has not been determined*". Against this, the latest SSVA [CEPS/17c] updated to June 2016, shows development at Rawlings Green (B1 – 650 units) to be viable with 40% affordable homes.
82. Evidence regarding the impact of traffic using the Cocklebury Link Road was summarised in the October 2015 Transport Briefing Note 2 [CTRAN/05]. In the short term, and in the absence of a Cocklebury Link Road (CLR) but with a development threshold of 200 dwellings, it concludes that there would be a 30% increase in traffic flows and an "*..up to a 55% increase in delay time experienced on the approach to New Road/Station Hill junction compared to the existing situation*". With the CLR open in association with a connection to the A350 or measures of equivalent benefit to that connection, and a development level of 650 dwellings, traffic flows and delays are forecast to be at levels similar to those experienced now (para 4.4). With a full ELR, linking the A350 to the A4, Table 1 in Transport Briefing Note 2 – Rawlings Green Traffic Impact (CTRAN/05) gives the change in vehicle flow as -9% and in queued delay time at Station Hill as -15% compared to 2015 levels.
83. From the evidence, it would appear that completion of a linking road through the North Chippenham, Area A development, to the A350 is an important factor in limiting the impact of development at Rawlings Green on the New Road/Station Hill area. However, according to the S106 agreement, up to 450 dwellings can be occupied at North Chippenham without this link being completed – although there is a proviso that no more than four years shall have passed since occupation of the first dwelling before it is in place. Either way, this suggests that it would be unlikely to be in place before 2022/2023. The housing trajectory indicates that the 200 dwelling limitation on Rawlings Green could be exceeded – triggering the need for the CLR – more than a year earlier. In these circumstances it may be necessary for the Council to fulfil its declared intent to seek to use its ability, or either via the Local Enterprise Partnership (e.g. Growing Places Fund) to resolve any financial

imbalances [*CTTRAN/12, para 11.7*] in order to safeguard the New Road/Station Hill area from undesirable congestion in the short term. It is necessary in order for the Plan to be effective, to recognise the importance of the sequential development of Areas A & B by a revision to the supporting text at para 4.19 (**MM5**). Additionally, amendments to para 5.18 are necessary in order to recognise the sensitivity of traffic levels through Monkton Park and the importance of new infrastructure, including the CLR, to achieving an acceptable long term traffic impact (**MM26**).

84. A document produced by ADL Traffic Engineering Ltd [*RM7/3*] expressed concern that there appeared to be a lower than expected traffic generation from the proposed development and that there would be "*...a severe residual impact on the highway network*". However, this referred to a TA carried out on behalf of the developers specifically related to the planning application (ref: 15/12351/OUT). The ADL document acknowledges that the TA assessed for 900 dwellings compared to the 650 ceiling incorporated in Policy CH2. It follows that little weight can be attached to the evidence in this Examination.
85. Overall, the implications of the Transport and Accessibility evidence is that, long term, there would be little change from the current situation for residents of the Monkton Park area, although short term there would be an increase in delay times at New Road/Station Hill. However, the Chippenham Transport Strategy Refresh 2016 (in draft form) indicates that, through implementing the full strategy, the forecast outcome for 2026 would be the volume of vehicles travelling into or through the town centre reducing by 15% in the morning and 10% in the evening peaks. The impact of the scheme could be expected to reduce the delay forecasts and, to some extent at least, address the short term impacts of the Rawlings Green development.
86. The extension of a road eastwards beyond the Rawlings Green development is not strictly a matter of consequence so far as the traffic implications of the development is concerned. However, it is important to recognise that the CSAP is concerned to provide for development only up to 2026. Beyond the Plan period it may or may not be necessary to provide for continuing development pressures on Chippenham. Whilst such provision is not for consideration in the CSAP it would be prudent and good planning practice to ensure that an ELR could be continued in an easterly direction towards the A4 east of Chippenham if required at a later date. The Council is aware of the need for flexibility and para 5.18 (**MM25**) was amended to indicate a requirement to allow for a road connection to the south-east at a future date if required.

#### *Agricultural land quality*

87. The SA, Addendum 1 [*CSUS/14*] advises that the Option B1 site (Rawlings Green) is comprised predominantly of Grade 2 (very good) BMVL agricultural land and suggests that, as such, mitigation of effects of development would be problematic (p40). It awards a 'Moderate adverse effect (--)' on the generic assessment scale, as is the case with all the site options considered. Looking at the SA of the proposed modifications [*CSUS/16*], Section 4 indicates that the site's status as greenfield and predominantly Grade 2 results in an assessment of major adverse effect (---) with no satisfactory

mitigation possible. This assessment is carried forward into the SA Note on Proposed Further Main Modifications (October 2016).

88. Clearly BMVL land is a matter of concern but this has to be balanced against the need to identify greenfield sites on the edge of town [*WCS, para 5.46*] and that, wherever peripheral development is located, BMVL land will be involved. It also has to be balanced against the allocation's location in relation to existing facilities and services. In this respect the findings of the SA [*CSUS/11*] are that Option B1 (amongst others) is of relatively higher sustainability performance leading to a recommendation to give it consideration for inclusion in a preferred development strategy.

#### *Flood risk*

89. The degree of flood risk arising from allocations has been a source of concern throughout the Examination. Most of the Policy CH2 allocation, and all of the built development proposed is located within Flood Zone 1. This is in accord with the NPPF sequential approach. The CSAP acknowledges that the allocation slopes down to the River Avon and requires that flood risk areas (zones 2 and 3) must remain undeveloped (para 5.11). However, the concerns remain and are based on the fact that Rawlings Green is located above the town centre where there is a record of recent flood events. Increased run-off from the developed areas is believed by some to increase the risk level, and photographs of recent flood events were supplied to the Examination as evidence. According to Evidence Paper 6 [*CEPS/10*], the most recent flooding has affected the bottom of High Street (para 3.1).
90. Evidence Paper 6 advises (para 3.9) that the need to prevent water flows from arriving too quickly at the radial gate in Chippenham centre is particularly relevant in the case of Rawlings Green (Area B). Its analysis (para 4.6) suggests the creation of large impervious areas would lead to additional peak flows joining the river with a consequent high flood risk at the radial gate.
91. However the Council indicates that the Plan has been guided by the Strategic Flood Risk Assessment, and that the specific requirements of Policy CH2 will ensure that future rates of runoff from the development will be less than the existing greenfield rates [*RM/7. Para 6.1*]. This was shown to be achievable by a detailed hydraulic modelling assessment carried out in 2012, referred to in *RM/7*. As a result of the above, to be effective, the specific requirement in Policy CH2, requires support through more detailed text at para 5.11, in order to provide an adequate safeguard against development increasing flood risk further downstream (**MM20**). Figure 5.2 must also be amended to ensure the developable area excludes all land liable to flooding (**MM19**)

#### *Deliverability*

92. Doubts about the deliverability of the CSAP strategic sites were raised in the early appraisal of the Submitted Plan and more specifically for the Area B, Rawlings Green proposals in the letter setting out the reasons for suspending the Examination [*EX/10*]. This focussed on the requirement for the Rawlings Green development to fund a bridge over the railway line to provide a second point of access to Area B. As already noted (paras 80 -86, above) this is

necessary because the site's location will place strain on existing traffic corridors, parts of which are already congested.

93. Initially there were doubts about the ability of Rawlings Green to fund the infrastructure requirements, including the railway bridge, whilst remaining WCS compliant in relation to the provision of 40% affordable housing. Following the suspension of the Examination more detailed costing of the infrastructure [CTTRAN/12, Appendix B] was fed into a revised SSVA [CEPS/17c]. The exercise has shown the development to be viable with 40% affordable housing and sensitivity testing shows the assessment to be robust.
94. The remaining concern with deliverability of the rail bridge, that of disputed land ownership, was a matter raised as part of the resumed Examination. The small area of land in question lies between the built section of Parsonage Way which ends in a short spur adjacent to the top of the railway embankment and the ownership of Network Rail. The dispute is between Wiltshire Council and adjacent landowner, Messrs Wavin Plastics, each claiming a controlling interest in the land. The matter of land ownership is not a planning matter to be resolved within the Examination process, it is for the parties concerned to seek a resolution, ultimately through the courts. However, there are implications so far as deliverability of the rail bridge is concerned, and therefore completion of the development of the Rawlings Green site.
95. Counsel's Opinion submitted to the Examination, based on documentary evidence [CTTRAN/15], and legal advice obtained by KBC Developments Ltd [RM/7a], supports the Council's view that – on the balance of probabilities - the land between the kerb-line of Parsonage Way and the boundary of Network Rail's ownership was adopted as highway maintainable at public expense. Even if this were not the case, Counsel's Opinion is that Wiltshire Council could exercise compulsory purchase powers to acquire the land in order to construct or extend an existing highway.
96. From the evidence, and using a common-sense approach to the matter, it appears that the physical layout of Parsonage Way took account of a potential rail crossing and that the narrow strip of land in dispute has no other obvious use. It also appears unlikely that, if the matter of ownership were so important, it has not been disputed in the 20 or so years since this section of Parsonage Way was adopted. In particular, it does not appear to have been the subject of dispute earlier in the process of developing the CSAP and its submission for Examination. For these reasons there do not appear to be insurmountable problems which would prevent the construction of the rail bridge.
97. The future possible electrification of the rail line was raised at the hearings as a potential problem for the construction of a bridge. However, the Council's evidence was that the depth of the cutting at the point of crossing would be more than adequate for the inclusion of electrification apparatus, and no contrary evidence was presented.

#### *Conclusion and Recommendation*

98. There are a number of matters that have required modifications to Policy CH2 and its supporting text in order for the Policy to be properly justified and



made effective. Additionally, I am concerned that development must be coordinated with the timely provision of infrastructure, as stated in the NPPF, paras 162, 173 and 177. As a consequence I have determined that there are significant issues which must be addressed by amendments to the Main Modifications proposed by the Council in order for the Plan to be considered positively prepared and effective. These affect MM5 (para 4.21) MM18 and MM26, and address my concerns with the access to the Rawlings Green site. I am also concerned that the requirement to limit new built development to land above the 50m contour, and provide for extensive tree planting to the eastern boundary of development have not been properly incorporated into Policy CH2 and so I have included amendments to the text of MM18.

99. As a consequence, in order for the Plan to be positively prepared and effective, Policy CH2 requires a main modification **(MM18)**; figure 5.2 requires replacement **(MM19)**, and the supporting text requires revisions to paras 5.11 – 5.18 **(MMs 20 – 25)**. With all of these modifications in place the Policy meets the requirements for effectiveness and positive preparation.

### **Issue 5 – Policy CH3 East Chippenham allocation**

100. The Strategic Site at East Chippenham under Policy CH3 in the Submitted CSAP was the most contentious of the proposed allocations. There were a number of reasons for this. These include: it would not contribute to the objective of improving self-containment; it is upstream of Chippenham and would require considerable works to avoid increased risk of flooding; the concept of the ELR is flawed; landscape evidence shows it to be an open area which would have a wider landscape impact and there are question marks regarding deliverability within the Plan period. Some of these issues were explored in the initial appraisal of the submitted CSAP [EX/1] and further in the letter of 16 November 2015 [EX/10] confirming the period of suspension of the Examination.
101. The conclusion of the revised SSR, Step 6, was that the site (Strategic Site Option C1) should be taken forward for further evaluation as a potential component part of a development strategy. Together with Site Options B1 and E2, it would form the 'Submitted Plan Strategy'. The final choice of a preferred strategy was between the Mixed and Submitted Plan Strategies with the SSR preferring the Mixed Strategy [CSAP/12, para 8.37]. Amongst the concerns identified (para 8.61) with the Submitted Plan Strategy were that the site is recognised as having particular adverse environmental effects that are also problematic to mitigate. In particular, impact on the attractiveness of the Marden Valley north of the North Wiltshire Rivers Route (NWRR) and possibly on the character of the Tytherton Lucas Conservation Area (CA) were matters of concern. Additionally the assessment indicates that even if the housing and employment elements were removed from the more sensitive areas the strategy would still involve the intrusion into those areas of the new road and the traffic it would bring.
102. The SSR also draws attention (para 8.69) to the Site Option falling slightly short in its capacity to deliver policy compliant affordable housing, and

suggests that its viability could be viewed as marginal. This was seen as a significant finding.

103. In summary, the inclusion of the East Chippenham allocation in the submitted CSAP was a consequence of the deeply flawed two-stage site selection process, and the ranking of WCS Core Policy 10 objectives. The revised SSR and SA demonstrate quite clearly that the CSAP, as submitted, was unsound so far as this allocation is concerned. The allocation does not perform as well as those chosen for inclusion in the CSAP, and it is unnecessary to develop east of the River Avon during the Plan period. Indeed, developing east of the river is a 'game-changer' so far as Chippenham is concerned. This is because it has the potential to unlock a substantial area of land for development which would significantly alter the character of the town and surrounding countryside. The merits or otherwise of making this choice are not for debate at this time but for a future Plan.
104. The promoters of the East Chippenham allocation have submitted representations objecting to its removal in the revised Plan. They consider failure to allocate the site would significantly hamper economic growth of the town, frustrate housing delivery, produce unacceptable traffic impact and cause harm to the natural, historic and built environment. Re-instatement of the allocation is sought.
105. The original allocation under Policy CH3 proposed 850 dwellings together with 5ha of employment land and a further 15ha safeguarded for development beyond 2026. However, on 9 March 2016 CSJ Planning, on behalf of the promoters, wrote drawing attention to a new collaboration relating to the delivery of development of an East Chippenham allocation and the related ELR and river crossing. This indicated that the ELR could be delivered early and ahead of the housing.
106. My initial appraisal [EX/1] suggested doubts about the viability and deliverability of the allocation having regard to the need for a new river bridge and associated works to ensure the structure does not impede water flows plus significant flood prevention works in addition to providing a section of the ELR. These doubts are mirrored by a note on viability in the CSJ Planning letter (p4), second bullet [CHSG/13b] which advises that, to the east of the river, "*...a critical mass of 1,200/1,500 homes is required as a standalone scheme*", although it suggests a lower number may be possible if there was certainty of a second phase. Either way, there can be no doubting the intention that there would have to be a significant commitment to substantial development east of the River Avon in the longer term. This adds weight to my concern that a commitment of this nature has the potential to significantly alter the character of Chippenham.
107. My concerns are also addressed in the revised SSR (Appendix 4, p43) which includes Strategic Site Option C2, described as a large area that corresponds to the land holdings and the extent of land being promoted with an anticipated scale of development in the order of 1,800 dwellings. In addition to the original Strategic Site Allocation in the submitted CSAP, Option C2 includes a substantial tract of land located to the north of the NWRR and extending as far as the River Marden, to include North Leaze Farm. It would potentially bring development to within half a kilometre of the Tytherton

Lucas CA. The Option was rejected during the SWOT analysis in the SSR because of major adverse environmental impacts where mitigation would not be possible and moderate impacts which would be difficult to mitigate. As a consequence the Option was not carried forward into the assessment of preferred strategies.

### *Conclusion and Recommendation*

108. The Submitted Plan Strategy would be unlikely to deliver the ELR east of the River Avon without additional development to address viability issues. This much is, as indicated above, accepted by the promoters although they stress the benefits of this approach which are seen as reducing the scale of development at the Rowden Park site and avoiding harm to the Rowden CA. However, the consequences of increasing the extent of the East Chippenham allocation to ensure viability would have a significant environmental impact, particularly on the open landscape to the north and east, for which the SA concludes that mitigation would be difficult or impossible.
109. A consequence of the Council's amendments, particularly increasing the amount of housing in the Rowden Park Strategic Site through Policy CH3, is that the inclusion of the East Chippenham Strategic Site is unnecessary. It follows that in this respect the Submitted Plan had not been positively prepared and is unsound. The Council has proposed to delete Policy CH3 in its entirety (**MM27**), together with figure 5.3 identifying the allocation (**MM28**) and the supporting text at paras 5.19 – 5.31 (**MM29**). With these modifications the Plan is positively prepared and justified and therefore sound.

### **Issue 6 – Policy CH4 Chippenham Riverside Country Parks**

110. Policy CH4 delegates much of the detailed matters to a masterplan process, and to a management plan approved by the Council. Para 5.33 indicates that the "*long term management of the country parks will be secured by planning obligation relating to individual sites*". No detailed information is provided, although at para 5.33 it is stated that further work is being undertaken to develop the ownership, governance and detailed management of the Country Parks. In order to be positively prepared this is a matter requiring some clarification, particularly in relation to NPPF, para 173, which seeks to ensure the viability of developments.
111. During the period of suspension of the Examination a report, Chippenham Riverside Country Park – Future Management [*CEPS/19a*] was prepared by Natural England and the Council which looked at 3 key questions:
- How should the country parks be managed?
  - What can the developers be expected to do?
  - How would they be funded?

The report looks at the full breadth of future management options and gives consideration to options for governance and ownership of the country parks and provides specific recommendations for the South West Chippenham and

Rawlings Green sections. This has addressed concerns that there was insufficient clarity in the proposed long term management of the country parks.

### *Conclusion and Recommendation*

112. Amendments to para 5.33 provide detail regarding the use of management plans and the requirement for master plans for each strategic site are necessary for effectiveness. They are provided through supporting text for the Policy **(MM30)**. There is also a reference to the report, through an additional modification, to ensure there is a link between the Policy and the Report. This is an appropriate course of action and no further modification is necessary for soundness reasons.

## **Issue 7 – Other Matters**

### *The A350*

113. The WCS (para 5.56) clearly identified the A350 as a potential barrier to development. The accompanying diagram shows the broad 'strategic areas' contained within the area to the east of the A350. Reflecting this guidance, the CSAP (para 2.3) indicated that the A350 is considered to be a clear and logical boundary to the town "*which should not be breached unless other options are exhausted*". The revised Plan amended the text to indicate that the boundary should not be breached "*..by mixed use strategic site development during the plan period*". The amended text has not satisfied those representors who objected previously.
114. From the evidence and from my visits to the area it is clear to me that the A350 is, indeed, a significant and clear cut boundary to the urban extent of Chippenham as identified by the WCS. It is sufficient for the Plan to state that it "*..should not be breached*". The Council has argued that land to the west of the A350 is already protected by being outside the Limits of Development for Chippenham, although adopted policies in the WCS would allow certain developments, such as rural exception sites (WCS Core Policy 44). Accordingly, it suggests implying blanket protection from development would not be in accord with the higher tier policy document. However, the WCS (para 4.15) clearly states that development outside the settlement boundary will be strictly controlled without qualification so there is no need to limit the statement at para 2.3 by reference either to the plan period, or to any specific form of development such as mixed use strategic sites. There is therefore no reason to retain the text. The Council has accepted the argument and has proposed that the extended text should be deleted **(MM1)**. This is necessary to ensure the Plan is justified in this respect.

### *Air Quality*

115. The consequence of development proposals for air quality has been raised as a matter of concern and the Council responded with an addendum to Evidence Paper 2 [CEPS/02a]. In respect of Chippenham it provides details of monitoring, indicating that locations for an exercise across the town in 2012 were chosen where "*...in officers' experience...*" pollutant levels were likely to

be raised. All the locations appear to relate to the PRN. The Chippenham Transport Strategy Refresh [CTAN/14] states that "...there are currently no locations in Chippenham where concentrations of NO<sub>2</sub> exceed the annual mean objective". However, it is a matter of note that there has been no monitoring device in the vicinity of the New Road/Station Hill junction, although this location matches the description in CEPS/02a, para 6.2, of "...terraced, canyon type streets, sometimes with an incline and that are heavily trafficked". Bearing in mind the proposal to route traffic from the Rawlings Green strategic site through this junction the omission is a matter of concern raised during the hearings [RM4/3].

116. During the Examination I experienced use of this junction at a number of different times of day and the particular matter which concerns me is that the development proposed at Rawlings Green by Policy CH2 is acknowledged by the Council to lead to "...a 55% increase in delay time experienced on the approach to the New Road/Station Hill junction, compared to the existing situation" [CSAP/14 para 5.18e]. The Plan expects this to be a short term impact as the Cocklebury Link Road will need to be open beyond the 200 dwelling threshold. There is no doubt that a 55% increase in delay time at the junction would raise the level of air pollutants so the provision of the CLR in association with a connection to the A350 or measures of equivalent benefit to that connection, is crucial to air quality in the longer term. Nevertheless, there is no practical measure incorporated in the Plan to ensure delivery of the link road, for example in the event that the development fails to deliver for one reason or another.
117. During the examination the Council gave an assurance [CTAN/12, para 11.7] that, to ensure delivery of infrastructure, it would seek to use its ability to resolve any financial imbalances and would consider the use of compulsory purchase powers to accelerate the provision of infrastructure. In order to be found sound in terms of effectiveness the Plan has to make it clear that the Council will use its powers to support delivery and I have provided additional text to this effect within Policy CH2 (**MM18**), and paras 5.18b and 5.18e (**MM26**) for this reason.

#### *Reserve Sites*

118. The CSAP does not include reserve sites that could be brought forward in the event of non-delivery of a strategic site allocation. As a consequence Wiltshire Council's approach to reserve sites was raised during discussion on omission sites. The Council's response is set out in a note submitted following the hearing sessions [EX/403]. Essentially, the WCS does not identify reserve sites but it does, for Salisbury, identify 2 broad areas of search that could be brought forward if further land is required in the future as part of the Council's ongoing monitoring process (WCS para 5.112, bullet 6). However, that is in the context of "*broad areas of search for future development around Salisbury*" and the WCS indicates that strategic allocations will be brought forward through a masterplanning process, rather than a strategic allocations plan. It is not, therefore, an equivalent situation to Chippenham, where the strategic site allocations in the CSAP include overprovision to meet the residual housing requirement.

119. In addition to the overprovision, the inclusion of small extension sites as part of the south west Chippenham allocation provides additional flexibility for delivery. This, together with the Wiltshire Monitoring Framework (WMF) and the additional indicators to be employed to trigger a review of the Plan as provided by new paragraphs 6.14a and 6.14b offers adequate safeguards. For these reasons the CSAP is positively prepared without the inclusion of further reserve sites subject to the inclusion of the proposed new paragraphs **(MM36)**.

#### *Sports facilities*

120. The amount of new housing proposed for Chippenham involves a need to balance this with recreational facilities. There is concern that the use of S106 agreements with developers to deliver infrastructure may not be deliverable and that, rather than provision being on a site-by-site basis, developers might consider pooling contributions to provide off-site facilities. The Council has responded on this issue by provided a Position Statement [RM/10] and a Note on the Playing Pitch Strategy [EX/402].
121. Negotiations such as these are generally matters to be dealt with through the masterplanning activity that will refine and develop the detailed distribution of land uses within the strategic site allocations. This activity is identified in para 4.23a, b and c **(MM5)** and para 4.23b specifically identifies the need to apply standards for provision to meet the needs of leisure and recreation. Additionally WCS, Core Policy 52, requires development to make provision in line with adopted Open Space Standards, currently set down in saved policies of the North Wiltshire Local Plan 2011.
122. At the time of writing this report WC is consulting on a draft Wiltshire Playing Pitch Strategy and Wiltshire Open Space Study as a result of which Sport England has withdrawn its objections to the CSAP. So far as the CSAP is concerned the Open Space Study 2015 [CHSG/14] concludes that Chippenham does not have a shortage of outdoor sports provision, whilst a shortage of amenity green space is addressed through proposals contained in Policy CH4 Country Parks. As a consequence the Plan is sound and no modifications are necessary in respect of recreational facilities.

#### *The Strategic Transport Network*

123. There is no part of the Strategic Road Network (SRN) which runs through the CSAP plan area, but the site allocations will have a cumulative impact on the M4 and, specifically, Junction 17. However, mitigation of the impact on J17 is a matter that must be addressed in order for the Plan to be positively prepared. During the period of the Examination's suspension the Council and Highways England continued negotiations, seeking agreement on how to mitigate the impact in relation to J17.
124. The Submitted CSAP did not specifically recognise the need for capacity improvements to J17 as a consequence of the planned growth. However, J17 is part of the A350 corridor and the WCS, CP66 includes a commitment to maintain, manage and selectively improve the corridor. The Council and Highways England agree that the timely delivery of the agreed junction improvement scheme is critical to protecting the primary role and function of the SRN. Additionally there is agreement that it is critical to the sustainability

of the CSAP [CSOCCG/01]. Clearly there is a need for the CSAP to recognise the impact that the proposals will have on the SRN, and specifically on J17, and identify the necessary improvements, without which the Plan cannot be found to be positively prepared and effective.

125. The Council has proposed to introduce a new section to the Plan, comprising new paras 5.34, 5.35 and 5.36, to recognise the commitment to the A350 included in the WCS and introduce a new improvement scheme to support the strategic growth in the CSAP. It has also accepted a minor modification to para 5.34 proposed by Highways England. The necessary modification is provided by **(MM31)**.
126. A separate issue has been raised concerning Objective 2, at para 3.6, where reference is made to strategic highway improvements that may be required to accommodate the impact of growth. As a consequence the Council has reconsidered the wording and has agreed a revised third sentence to the paragraph [CSOCCG/15], necessary for the Plan to be effective. This will ensure modes of transport such as cycling and public transport receive equal consideration with the motorised form, and will ensure that, in this respect, the Plan is positively prepared **(MM2)**.

#### *Monitoring and Implementation*

127. Chapter 6: Monitoring and Implementation was not in contention as there is already a monitoring and implementation framework – WMF [CWCO/09] – that positions Chippenham in the wider context. This has already been reviewed as part of the examination into the soundness of the WCS. Measures included within the CSAP are additional to those already operating through the WMF.
128. The process of monitoring and implementation is an important factor, ensuring the Plan is effective in delivery of the proposals and accompanying infrastructure. The Council has proposed amendments to the Chapter, replacing table 6.1, housing delivery, with an updated version **(MM32)**; amending paras 6.4 – 6.6 to provide updated text relating to the adoption of a Community Infrastructure Levy **(MM33)**; deleting paras 6.10 – 6.11 and Table 6.2 (the housing delivery trajectory) **(MM34)**. All of these are necessary amendments to achieve an effective Plan. A further consequential amendment to para 6.9 reflects the revised SSVA **(MM35)**.
129. Two new paragraphs – 6.14a and 6.14b - have been proposed. The first of these reflects the relationship between the WMF and the WCS proposals for the Chippenham Community Area under WCS Core Policy 10. The second paragraph provides an additional indicator to the WMF to provide clarity for when a review of the CSAP should be triggered and to ensure timely provision of infrastructure. These are important considerations and the modifications **(MM36)** ensure the Plan is effective in this respect.
130. Perhaps the most significant proposed revision is the introduction of a risk register to help manage and coordinate the delivery of homes and jobs and ensure that the Plan is effective in this respect. It is the Council's intention that its major applications team will take responsibility for implementation and will use the register as a public means to manage risks, and identify responsibilities and mitigation measures [RM/10]. An outline of the risk

register is proposed to be incorporated in the CSAP as Table 6.3 although the register is intended to be a living document. This is a useful innovation where there is a need to manage significant development proposals and so for the Plan to be effective the modification should be incorporated in the CSAP supported by new text at para 6.15a **(MM37)**.

131. Lastly, so far as chapter 6 is concerned, a Glossary of terms is a necessary addition to assist those seeking to use and understand the Plan, and has been added by a Main Modification **(MM38)**.

## **Issue 8 – Omission sites**

132. The CSAP has a very specific remit, identified in para 2.1: "*to identify large mixed use sites..to provide homes and jobs for the town's growing population*" to meet the strategy requirements contained in WCS Core Policy 10. A key consideration is that Policy 10 identifies the need for development to be "*..on land adjoining the built up area*" (para 5.55). These two considerations (large mixed use sites and adjoining the built up area) formed the basis for the chosen allocations.
133. Taking account of the updated residual requirement for housing, the proposed allocations and the revised forecast housing trajectory **(MM32)**, the chosen strategy provides for a total of 2050 dwellings, 270 more than the residual requirement, at April 2015, with (according to the trajectory) 1,925 deliverable by 2026, the end of the Plan period. Taking account of the advice in the NNPF that LPAs should be seeking to significantly boost the supply of housing and the need for flexibility should delivery on any allocated sites be delayed, the CSAP can be seen to provide an adequate supply of land for the Plan period. For this reason there is no overriding justification for allocating additional sites.
134. A total of five omission sites were put forward during the Examination for consideration. These are: land at Barrow Farm to the north and adjacent to Bird's Marsh Wood (Robert Hitchins Ltd); Gate Farm to the east (David Wilson Homes); Forest Farm to the east of Pewsham (Gleeson Developments Ltd); and land to the south of Showell Nursery (Hallam Land Management), together with a fifth, smaller site at Saltersford Lane, put forward for inclusion by Strategic Land Partnerships. All of these, with the exception of the site at Saltersford Lane, were considered by the SSR and SA either as potential Strategic Allocations or included within potential Strategic Locations.

### *Land at Barrow Farm*

135. The proposal for development of up to 500 dwellings at Barrow Farm raises significant concerns in relation to landscape, ecology, and heritage. In particular, the SA outcome shows a significant adverse effect on the Birds Marsh Wood County Wildlife Site (CWS) requiring a buffer zone which would be likely to leave insufficient space to deliver the proposal. This conclusion was based on a cumulative impact, taken together with the proposal for 750 dwellings which already has approval on land to the south-west of Barrow Farm (12/00560/OUT). During my visit I saw the area shown as green space to provide a buffer zone and have formed the opinion that it would not



provide sufficient mitigation to prevent harm to the CWS. I also experienced the degree of separation between Chippenham and the Langley Burrell CA and concur with the finding of the SA regarding the potential impact of development on land contributing to the setting of the CA.

136. A further issue raised at the hearings following discussion in respect of the land at Gate Farm (paras 137 - 138, below), is the assertion that account was not taken of evidence regarding the extent of BMVL within Strategic Site Option A1. My findings in respect of Forest Farm (paras 139 – 141) are equally applicable to this site. The data available to the SA exercise showed only Grade 3 land, without any distinction between 3a and 3b. This is the case for all alternative sites and since both the SA and the SSR exercises are comparative ones, there is no discrimination or unfairness involved in the selection process. Indeed, if more detailed information were to be used in respect of one alternative, it could be argued that the assessment showed bias in its favour.

#### *Land at Gate Farm*

137. The land at Gate Farm extends to some 7ha, for which a development of up to 140 dwellings is proposed. It is argued that the location is a sustainable one which, in the event that the East Chippenham allocation is deleted, would provide choice and competition to the market, provide for early delivery of housing and facilitate delivery of the southern junction and first phase of the ELR.
138. However, looking at the wider picture, development along the A4 eastwards has taken the form of a linear extension terminating at Abbeyfield School and Stanley Lane, whilst Pewsham appears as a development isolated from the main town by the River Avon. There are two issues with an allocation at Gate Farm. Firstly, it is not of sufficient size to form a large mixed use strategic site allocation on its own and to be considered would have to form part of a larger allocation as is the case with the smaller extension sites proposed for the Rowden Park allocation. Secondly, on its own, and without the East Chippenham allocation Gate Farm is not a sustainable location and would simply extend the linear development of the A4 further into the open countryside to the east. For these reasons it is not an appropriate allocation.

#### *Land at Forest Farm*

139. The promoters of Forest Farm control a significant area of land, extending to some 42ha, to the south east of the town and on the A4 beyond Pewsham. In total it could accommodate up to 700 dwellings and an area of employment land. It could arguably be described as a 'large mixed-use site' meeting the requirement for a Strategic Site allocation. Amongst the potential benefits of the development proposals would be reinstatement of a section of the Wilts and Berks Canal, a heritage asset, which lies within the southern part of the site.
140. It is suggested that the revised site selection process has treated the proposed allocation, identified as Option D1 in the SA, unfairly particularly in respect of the assessment of BMVL. It is suggested that the site is 80% Grade 3b or lower, whereas the SA treats all Grade 3 land as resulting in adverse effects against SA objective 2. The assessment indicates that

development of the site would result in the permanent loss of BMVL but table A7 [CSUS/14] indicates that "the precautionary approach to Grade 3 land presumes all Grade 3 land to be BMV land". The Council has advised that comparable information on BMVL is not available for all potential sites so that the precautionary approach was adopted. The SA involves comparative assessment of the reasonable alternatives so it is right that comparative evidence should be used.

141. However, even if the assessment regarding BMVL is discounted, the site has other disadvantages which lead to its exclusion as a strategic site allocation. In particular the location is remote from the main town and as a result it cannot be described as sustainable when other, more accessible locations are available. The remoteness of the location is emphasised by the presence of a ridge at the western boundary of the Pewsham development and an eastward facing slope to the Forest Farm site so that it appears as part of the more open landscape rising towards Derry Hill and Bowood House. It is argued that it would provide employment land, suggested by the promoters to be "well located", and could deliver 40% affordable housing and a school site amongst other benefits. However, although the development would support increased use of the existing public transport along the A4, it would not assist in improving access to the PRN which is identified as weak. For all of these reasons there are better locations for large scale development as shown by the SSR and so it is not an appropriate location for a strategic site allocation.

#### *Land to the south of Showell Nursery*

142. The land to the south of Showell Nursery is not promoted as a self-contained Strategic Site Option but as an extension to the Rowden Park allocation. It forms part of Option E3 for which the SA gives an overall assessment of no major adverse effects from its development. There is a moderate adverse effect against one of the environmental objectives but it would provide good quality affordable homes, and mix of uses with strong access to employment and to the PRN. Nevertheless, there are significant landscape impacts to take into account. The SWOT analysis rejects the site on the grounds that it extends the development furthest south and is the least preferred option in relation to landscape impact. This is particularly true of this omission site which is part of E3 and appears as part of the open countryside with the ground rising gently towards the southern boundary beyond which there is a lightly wooded ridgeline. Overall, the location's weak access to the town centre and the potential impact of development on the countryside setting suggest that other site options should take precedence in the selection process.

#### *Land at Saltersford Lane*

143. The site at Saltersford Lane extends to a little under 2.5ha and is capable of accommodating up to 80 dwellings, located between Saltersford Lane and the railway line, and east of the Hunters Moon proposed development. The site has previously been granted planning permission but this was not implemented and has now lapsed. The promoters of the site, Strategic Land Partnerships, consider it should be included in the plan as a smaller extension site, possibly to the Hunters Moon site – similar to those included under Policy CH1 – or, alternatively, that the settlement boundary should be extended to

include the site. A Position Statement identifying unresolved issues has been agreed with the Council [SO CG/16].

144. Hunters Moon is not a Strategic Site Allocation in the CSAP, but an existing commitment. Although planning permission was granted, subject to the signing of a S106 agreement, almost 3 years ago development of the site has not yet commenced. The Council's latest Housing Land Supply Statement, November 2016 [CHSG/08a], indicates that the Hunters Moon site will not produce dwelling units until 2020/21. In this circumstance the Council is right to consider the risk that the Saltersford Lane site could be promoted in isolation resulting in poorly co-ordinated new development without local infrastructure being in place. As a consequence it would not be good planning in the short term to include the site as a small extension to Hunters Moon.
145. In respect of the alternative possibility, the Council has applied a consistent approach to the identification of settlement boundaries across the County. This includes the treatment of existing commitments, which are not yet developed, as not currently part of the built-up area. Applying the same principle the suggested alternative approach, involving an extension to the settlement boundary, would also not be appropriate. Accordingly no modification to the Plan is proposed or necessary for soundness reasons.

## Assessment of Legal Compliance

146. My examination of the compliance of the Plan with the legal requirements is summarised in the table below. I conclude that the Plan meets them all.

LEGAL REQUIREMENTS	
Local Development Scheme (LDS)	The CSAP has been prepared in accordance with the Council's LDS January 2015 although adoption will be delayed through suspension of the Examination.
Statement of Community Involvement (SCI) and relevant regulations	The SCI (update) was adopted in July 2015. Consultation on the Local Plan and the MMs has complied with its requirements.
Sustainability Appraisal (SA)	SA, as amended, has been carried out and is adequate.
Habitats Regulations Assessment (HRA)	The Habitats Regulations AA Screening Report July 2015 sets out why AA is not necessary and the conclusions were confirmed as remaining sound in April 2016. Natural England supports this.
National Policy	The CSAP complies with national policy except where indicated and MMs are recommended.
2004 Act (as amended) and 2012 Regulations.	The CSAP complies with the Act and the Regulations.

## Overall Conclusion and Recommendation

147. The Plan has a number of deficiencies in respect of soundness for the reasons set out above, which mean that I recommend non-adoption of it as submitted, in accordance with Section 20(7A) of the 2004 Act. These deficiencies have been explored in the main issues set out above.

148. The Council has requested that I recommend MMs to make the Plan sound and capable of adoption. I conclude that with the recommended main modifications set out in the Appendix the Chippenham Site Allocations Plan satisfies the requirements of Section 20(5) of the 2004 Act and meets the criteria for soundness in the National Planning Policy Framework.

*Patrick T Whitehead*

Inspector

This report is accompanied by an Appendix containing the Main Modifications.

## Appendix – Main Modifications

The modifications below are expressed either in the conventional form of ~~strikethrough~~ for deletions and underlining for additions of text, or by specifying the modification in words in *italics*.

The page numbers and paragraph numbering below refer to the submission local plan, and do not take account of the deletion or addition of text.

Ref	Page	Policy/ Paragraph	Main Modification
MM1	10	2.15	Amend paragraph 2.15 as follows:  "The A350 is one such barrier to development, but is also considered to be a clear and logical boundary to the town, which should not be breached <del>by mixed use strategic site development during the plan period</del> unless other options are exhausted."
MM2	17	3.6	Amend paragraph 3.6 as follows:  "It is important that housing delivery is managed throughout the plan period to ensure that it takes place in step with the provision of new infrastructure. <u>As well as facilities forming a part of development, this may, for instance, include strategic highway transport improvements that may will be required to accommodate the impact of growth, including measures for cycling, walking and public transport access to the town centre and employment areas.</u> The Core Strategy already identifies a number of improvements needed in Chippenham which need to be provided alongside development <u>including enhanced health and emergency services. This is also recognised in the Infrastructure Delivery Plan (September 2013) which identifies extended GP services as prioritised essential infrastructure.</u> The NHS and GPs in Chippenham are working towards a detailed proposal for delivering these <u>enhancements.</u> Sustainable construction and low-carbon energy will be integral to the development of all strategic sites."
MM3	21	4.3	Amend paragraph 4.3 as follows

			<p>"The data included in the Wiltshire Core Strategy identified that land for a further 2,625 new homes would be required at Chippenham to meet the at least 4,510 homes to be built by 2026. However, figures for housing supply are constantly changing. <del>for example, since these were first published a further large site at Hunters Moon has been granted permission subject to the signing of a Section 106 Agreement. Figures also take account of brownfield sites identified in Core Policy 9 of the Wiltshire Core Strategy and the Chippenham Central Area Master Plan such as redevelopment proposals at Langley Park.</del> The latest housing land supply statement assessment therefore indicates that the residual requirement at Chippenham is now at least <del>1,935</del> <u>1,780</u> homes."</p>
MM4	21	4.4	<p>Add additional text to paragraph 4.4 as follows:</p> <p><del>"The Housing and Employment commitments form part of the present development strategy for Chippenham and should be delivered within the plan period in order to ensure at least the rate of growth proposed in the Core Strategy. as it is assumed the housing arising from the commitments will be built within the plan period and will ensure the overall scale of growth proposed in the core strategy is achieved. "</del></p>
MM5	23-25	4.10 – 4.24	<p>Amend paragraphs 4.10 to 4.24 as follows. Insert the diagram 1 shown in appendix 1 after paragraph 4.14.</p> <p>"Methodology</p> <p>4.10 The Wiltshire Core Strategy sets a minimum amount of additional housing and employment for Chippenham between 2006 and 2026. It also establishes a set of six criteria to guide Chippenham's expansion (the Core Policy 10 criteria). These form the central basis for selecting 'strategic sites'. A strategic site assessment framework was developed to define how the Core Policy 10 criteria are interpreted and was informed by comments from the community and other stakeholders.</p> <p>4.11 The WCS identifies, diagrammatically, a set of indicative strategic areas located east of the A350 as potential areas of future expansion for strategic mixed use sites. The 'strategic areas' are defined by barriers such as main roads, rivers and the main railway line. Land west of the A350 is not considered a reasonable</p>

		<p>alternative for the allocation of strategic sites. The Council's reasoning is set out in Briefing Paper 2, which explains the definition of strategic areas <sup>(34)</sup>.</p> <p>4.12 The strategic areas and options for strategic sites have been assessed using sustainability appraisal. Sustainability appraisal performs a similar task to the strategic site assessment framework and reports on likely environmental, social and economic effects of the options in order to inform decision making. This work has been carried out independently to the council <sup>(35)</sup>. (Chippenham Site Allocations Plan: <del>Draft Sustainability Appraisal Report volumes 1 and 2, Atkins, February 2015 April 2016)</del>)</p> <p>4.13 Each of the strategic areas has been assessed to see how they perform against the criteria contained in the core strategy as well as the sustainability appraisal. <del>This culminated in a preferred area being selected. The next stage was to generate a set of site options within the preferred area. Each site option had to be capable of delivery and of containing the individual infrastructure requirements necessary to support their development (like schools and open spaces), plus accommodating other place shaping or environmental constraints (such as important historic assets or landscape features). The performance of detailed site options was then also assessed against the criteria, evidence through the strategic site assessment framework, as well as sustainability appraisal and a preferred site option selected. A result of that process was to suggest different patterns for the town's growth involving different strategic areas. These are termed 'development concepts'.</del></p> <p>4.14 <del>As the overall scale of development could not be achieved within the first preferred area, the two stage process was repeated. The next preferred area was selected in light of the proposals emerging from the previous preferred area, taking into account the scope for any links or combined effects between them. The process was then continued culminating in the selection of a third site option. The detailed process is explained in the report on the Site Selection Process. (36) Based on information in the Council's Strategic Housing Land Availability Assessment more than twenty potential strategic site options were examined. An assessment of these</del></p>
--	--	---

		<p><u>sites removed those that could not realistically be considered developable, suitable and achievable, reduced the number to 14 site options that were the looked at in greater detail using both sustainability appraisal and an assessment of their strengths, weakness, opportunities and threats in terms of how they performed against the guiding criteria contained in WCS Core Policy 10. Based on these assessments and how well each strategic site option fitted with a development concept, four alternative strategies were compared, again using sustainability appraisal and SWOT assessment, and a preferred strategy selected. The process is set out diagrammatically below:</u></p> <p><u>4.15 As a result of this process the preferred options are as summarised below. A preferred strategy has been selected and modified to take account of the risks and constraints identified through the assessment process. These proposals have also been subject to sustainability appraisal. As a result of this process the preferred strategy is summarised below.</u></p> <p>The Proposals</p> <p><u>4.16 The assessment of strategic areas is set out in detail in the Chippenham Site Allocations Plan: Site Selection Report (February 2015) which weighs up the most appropriate broad directions for Chippenham to expand. The result of the assessment has shown that immediately north and south of the town represent the first preferred strategic areas for growth (Areas A and E in Figure 2.2). The assessment of strategic areas, site options and alternative strategies is set out in detail in the Chippenham Site Allocations Plan: Site Selection Report (May 2016). The preferred strategy represents a combination of development concepts that capitalise on the locational advantage of the A350 corridor.</u></p> <p>4.17 The Council <del>is already disposed to grant</del> <u>has already granted</u> consent for a significant development north of Chippenham, located in Area A (see above) for a mix of uses including up to 750 new homes (Land at North Chippenham 12/00560/OUT). This development would have access to the A350 and it would provide a road built to a distributor road standard offering the opportunity for it to have a wider role in the network. This road can also provide a clear visual and man-</p>
--	--	--



		<p>made boundary to the town. The evidence suggests that further development north would have detrimental landscape and ecological effects, in particular with respect to cumulative impacts on the value of Birds Marsh Wood County Wildlife site, and fails to meet Criterion 5 (Landscape) of Core Policy 10 without offering significant benefit over and above the development already permitted.</p> <p><del>The first preferred area</del> <u>South West Chippenham</u></p> <p>4.18 <del>Within Area E, SW Chippenham is an immediate phase of development geared to provide deliverable land for employment and housing. The proposals are to meet the great majority of land required urgently for employment development on an 18ha site at Showell Farm. This will provide serviced land for a variety of uses. Landscape impacts are acceptable and land for employment development is well located and can be brought forward relatively quickly. A strategic site is identified for approximately 1,000 new dwellings and 18ha land for employment at South West Chippenham. This is in the mid range of site capacity options examined. The housing trajectory indicates that about 850 dwellings could be built</del> <u>The SW Chippenham allocation comprises the Rowden Park site which is identified for approximately 1,000 new dwellings and 18ha land for employment and additional smaller extension sites identified for approximately 400 new dwellings. The housing trajectory indicates that about 1400 dwellings could be built in the remainder of the Plan period, looking to 2026 (see Table 6.1).</u></p> <p><del>The second preferred area</del> <u>Rawlings Green</u></p> <p>4.19 <del>The second preferred area is Area B north east of the town at Rawlings Green. While this area performs well against Core Policy 10 criteria 3 (road network) and 4 (accessibility), it is a prominent area where development may have a wide landscape impact. Detrimental effects would need to be mitigated by an appropriate design and layout. Within Area B a site option for a low density of development and extensive strategic landscaping is identified for development at Rawlings Green. Proposals require a low density of development and extensive strategic landscaping is identified for development at Rawlings Green. This would be capable of</del></p>
--	--	---

			<p>accommodating up to 650 new dwellings and 5ha of land for employment generating uses. Up to 200 new homes could be accommodated before a new link road is needed to connect the site over a new railway bridge to the distributor road provided as part of the North Chippenham development in Area A. <del>The preferred option is to</del> <u>This new road link will continue this new road link</u> through the site to Monkton Park, which would provide a new access route to the A350 for the north of the town avoiding the town centre. It will serve the development itself and relieve current congestion that might otherwise worsen unacceptably on routes into and out of the town centre. <u>It is an objective of this Plan that the route through North Chippenham connecting the B4069 with the A350 must be in place before any development commences beyond the first phase of 200 dwellings on the Rawlings Green allocation.</u></p> <p>4.20 <del>These proposals (preferred Area E and second preferred Area B) mirror the locations selected previously as a part of preparing the Wiltshire Core Strategy. Together these sites provide land for approximately 1,650 new homes. The housing trajectory indicates that 1,500 of these homes can be built within the plan period which is less than the number needed to meet the housing requirements (see Table 6.1). A third preferred area is therefore required to ensure 1,936 homes can be delivered by 2026. The two sites can accommodate a total of approximately 2,050 homes although it is possible that not all this number will be built within the plan period to 2026. At a late point in the current plan period land allocated land may contribute to meeting housing requirements for the next plan period and reduce the potential for a fall off in housing supply while a new plan is emerging for the period beyond 2026. The scale of development recognises the additional complexity of ensuring deliverable land. The amount of land allocated results in a scale of development that therefore exceeds the requirements set out in the Wiltshire Core Strategy. A choice of new locations for new homes provides a flexible choice of deliverable sites in terms of a range of potential house builders and the choice of homes. It also recognises that it is possible that not all large strategic sites will be completed in the Plan period and the risks associated with the greater level of complexity involved in the delivery of large strategic sites.</del></p>
--	--	--	--

		<p>The third preferred area</p> <p>4.21 Area C (as indicated on figure 2.2), east Chippenham, represents the third preferred area. This area, especially north of the cycleway, represents an area that is open and, like Rawlings Green, will have a wider landscape impact. In particular, considerable work will be needed to avoid increased flood risks to the Town and elsewhere. Indeed development should reduce such risks. This area has no obvious features that form a logical natural boundary. The chosen site option creates a new potential boundary by taking a new distributor road to form a landscaped corridor that would provide visual containment following a similar approach used for the existing Pewsham area in the south of the Town and as proposed at North Chippenham. The site identified at East Chippenham can accommodate approximately 850 new dwellings and approximately 20ha of land for employment use, partly recognising this will contribute to meeting employment land needs beyond 2026. As a part of its development it will provide a distributor standard road crossing to the River Avon and complete an Eastern Link Road for the town connecting the A4 to the A350, mitigating much of the congestion that would otherwise occur(37). <u>Development at Rawlings Green involves building new roads in step with the development, including completion of a link between Cocklebury Road and the A350, together with the provision of a new bridge over the railway, in order to ensure there are no unacceptable traffic impacts and so that the wider benefits to the network are achieved as soon as possible. The proposals also include large new areas along the River Avon for country parks. These will provide easier and direct public access to the countryside for all residents and visitors. They will also include areas set aside to be managed to protect and improve their nature conservation value. As a substantial corridor of land it also provides opportunities for new and improved cycle and pedestrian links around the town, as well as to and from the town centre. These proposals go a substantial way to fulfilling a longstanding aspiration to capitalise on the River Avon as an asset to the town.</u></p> <p>4.21a <u>Both proposals safeguard the potential for future road alignments to the east and south of the town and require that their design and layout must not prohibit road connections in the future. This is based on evidence prepared for the Plan</u> <sup>(1)</sup></p>
--	--	--

		<p><u>that indicates an Eastern Link Road and/or a Southern Link Road may be longer term solutions to improving the town's network resilience. The policies ensure that development during the Plan period does not undermine the future development of the town and will enable further investment in roads to support the growth of the town if required in future plan periods.</u></p> <p><u>(1) Position Statement Improving Network Resilience in Chippenham and Transport and Accessibility Evidence Paper Part 2a : Assessing Alternative Development Strategies</u></p> <p><del>4.22 The three sites to be allocated can accommodate a total of approximately 2,500 homes of which around 2,350 may be built within the plan period to 2026. The remainder will contribute to meeting housing requirements for the next plan period and reduce the potential for a fall off in housing supply while a new plan is emerging for the period beyond 2026. The amount of land allocated results in a scale of development that therefore exceeds the requirements set out in the Wiltshire Core Strategy. It is justified by the need to provide a flexible choice of deliverable sites in terms of a range of potential house builders and locations around the town. It also acknowledges that not all large strategic sites will be completed in the Plan period. A main justification is that by so doing the Plan provides a framework which will deliver road infrastructure necessary to support the Town's long term growth potential, safeguarding the role of the Town Centre and the functioning of the A350 in the County's economy by addressing the potential for congestion that is an inevitable by product of housing and employment development.</del></p> <p><del>4.23 Each of the proposals involve the building of new roads in step with the additional development proposed in order to ensure there are no unacceptable traffic impacts and so that the wider benefits to the network are achieved as soon as possible. The proposals also include large new areas along the River Avon for country parks. These will provide easier and direct public access to the countryside for all residents and visitors. They will also include areas set aside to be managed to protect and improve their nature conservation value. As a substantial corridor of</del></p>
--	--	---

		<p>land it also provides opportunities for new and improved cycle and pedestrian links around the town, as well as to and from the town centre. These proposals go a substantial way to fulfilling a longstanding aspiration to capitalise on the River Avon as an asset to the town.</p> <p><u>Master plans</u></p> <p><u>4.23a The following proposals establish the principles of development at South West Chippenham and Rawlings Green and East Chippenham based on evidence prepared that is appropriate to plan making. Each policy also requires any application to be informed by a master plan which will reflect additional evidence prepared at a level of detail to support a planning application as well as the principles and requirements established in policies CH1 and CH2 and CH3. Such evidence will include, but is not limited to a Landscape and Visual Impact Assessment, Heritage Assessment, Biodiversity Report, surface water management plan, Flood Risk Assessment and Highways Statement. Such new evidence can be used as a material consideration when considering a specific planning application. A master plan will refine and provide a more detailed distribution of land uses for each site than that shown in the indicative plans (figures 5.1-3). Further detailed landscape assessment may suggest boundaries that have a better visual impact. A minor variation in site boundaries from those on the policies map may therefore be justified on new evidence presented at the time of the application on landscape grounds.</u></p> <p><u>4.23b Adopted standards for provision to meet leisure and recreation needs will be applied to each of the proposals. An audit of existing open space assets concludes that Chippenham does not have a shortage of outdoor sports provision. A shortage of amenity green space, parks and areas for informal recreation is addressed by provision for substantial open space by proposals contained in policy CH4.</u></p> <p><u>4.23c A master plan will also include an explanation and show the nature and location of surface water management measures.</u></p> <p>4.24 The proposals in the Chippenham Site Allocations Plan must be read in</p>
--	--	---

			conjunction with the Wiltshire Core Strategy. Proposals for new development will be considered against all relevant policies, including those relating to place shaping and high quality design. As with all planning applications the general policies, for example affordable housing (Core Policy 45), sustainable construction (Core Policy 41), high quality design (Core Policy 57) in the adopted Wiltshire Core Strategy apply to the consideration of these sites. The developers of strategic sites will prepare Sustainable Energy Strategies setting out how proposals meet carbon reduction targets, and identifying how maximum targets can be achieved, particularly where lower cost solutions are viable (such as Combined Heat and Power)."
MM6	26	Figure 4.1	Replace figure 4.1 as indicated in appendix 1.
MM7	29	CH1	<p>Amend policy CH1 as follows:</p> <p>Policy CH 1 South West Chippenham</p> <p><u>Rowden Park Site</u></p> <p>Approximately 171ha land at South West Chippenham, as identified on the policies map, is proposed for mixed use development to include the following:</p> <ul style="list-style-type: none"> <li>• 1,000 dwellings</li> <li>• 18ha of land for employment (B1, B2, and B8 uses of the Use Classes Order) <u>adjacent to the A350</u></li> <li>• Land for a 2 Form Entry primary school</li> <li>• A local centre</li> <li>• <u>Approximately 100ha</u> <del>104ha</del> as a riverside country park</li> <li>• strategic landscaping and open space to retain and reinforce existing hedgerows and establish new areas of substantial planting</li> <li>• no more than 800 homes to be completed before the Cocklebury Link Road (from the A350 to Cocklebury Lane) is open for use <u>or a set of comprehensive transport improvement measures of equivalent benefit</u></li> </ul>

		<p>Development will be subject to the following requirements:</p> <ol style="list-style-type: none"> <li>1. surface water management that achieves equivalent or less than current Greenfield rates of run-off</li> <li>2. <del>financial contributions toward provision of new schools</del> <u>provision of sufficient school capacity to meet the need created by the development</u></li> <li>3. <u>A marketing strategy to be agreed with Wiltshire Council and carried out to ensure the early release of serviced land for employment is available for development before the completion occupation of the 50th dwelling</u></li> <li>4. <del>a pedestrian and cycle route across the River Avon connecting to the town centre</del> <u>enhanced routes for cycling and walking to and from the town centre</u></li> <li>5. a design and layout that preserves <u>or enhances</u> the importance and settings to designated heritage assets</li> <li>6. Design and layout of development must not prohibit a potential future road connection to land to the east <u>from the A350 to the river.</u></li> <li>7. measures to enhance the character of the Rowden conservation area</li> <li>8. <u>a design and layout that allows for the appropriate integration of the smaller extension sites included on the policies map.</u></li> </ol> <p>Development will take place in accordance with a main masterplan for <u>Rowden Park, the main site</u>, as <u>shown on the policies map</u>, approved by the Council prior to commencement. <u>The master plan will be informed by detailed evidence which will include a Landscape Visual Impact Assessment, Heritage Assessment, Biodiversity Report, Surface Water Management plan, Flood Risk Assessment and Highways Statement.</u></p> <p><u>Smaller Extension Sites</u></p> <p><u>Approximately 11ha of land at South West Chippenham, as identified on the policies map, is proposed for <del>mixed use</del> residential development to include the following:</u></p>
--	--	---

			<ul style="list-style-type: none"> <li>• <u>Up to 400 dwellings</u></li> <li>• <u>Strategic landscaping and open space, to retain and reinforce existing hedgerows and establish new areas of substantial planting including the retention of important hedgerows, where appropriate, to provide a 'soft' urban edge to development.</u></li> </ul> <p><u>Development will be subject to the following requirements:</u></p> <ol style="list-style-type: none"> <li>1. <u>a design and layout that integrates with the Rowden Park site in terms of meeting local community needs and traffic management</u></li> <li>2. <u>that adequate infrastructure is available to serve the needs of the development</u></li> <li>3. <u>financial contributions towards provision of new schools and other infrastructure necessary to enable development to proceed</u></li> <li>4. <u>surface water management that achieves equivalent or less than current Greenfield rates of run-off</u></li> <li>5. <u>a design and layout that preserves the importance and settings to designated heritage assets"</u></li> </ol>
MM8	30	Figure 5.1	Replace figure 5.1 as shown in appendix 1.
MM9	31	5.1	<p>Amend paragraph 5.1 as follows and new paragraphs 5.1a and 5.1b:</p> <p><u>"5.1 The development of this area requires a comprehensive treatment to the western side of the River Avon south of Chippenham. To support a supply of deliverable land, treatment of the site will be divided between the Rowden Park site and smaller extension sites.</u></p> <p><u>5.1a The Rowden Park site will provide a mixed use development and comprises the site allocation as shown on the Policies Map excluding the smaller extension sites. This will provide a mixed use development. Much smaller sites are likely to provide additional housing once the Rowden Park site progresses and as the urban area is extended outwards from the town.</u></p>



			<p><u>5.1b Development will therefore be led by a single master plan for a predominant part of the site, the Rowden Park site, as shown on the policies map. Proposals for this site are well advanced and this site will set in place employment land, land for a new school and other infrastructure. Master planning will show comprehensive transport linkages within the allocation and to key destinations elsewhere. It is envisaged that further opportunities for development will arise as development envelopes the other parcels of land, but as the detailed design and timing of these sites has yet to be determined, they need not form part of the Rowden Park site masterplan."</u></p>
MM10	31	5.2	<p>Amend paragraph 5.2 as follows:</p> <p>'A key element of these proposals is the early release of serviced land for employment development for a range of uses. With easy access to the A350 and M4 <del>premises within an attractive environment</del> the area will accommodate existing local businesses looking to expand and attract inward investment from further afield. The Council with its partners will play a proactive role in partnership with developers in order to ensure development can take place, by marketing the site, brokering discussions with interested businesses and exploring other initiatives in collaboration with the Local Enterprise Partnership. Development of the site will deliver serviced land, with road access, utilities and communications infrastructure, as part of a first phase of development. <u>A marketing strategy to be agreed with the Council will include details of the marketing campaign and site particulars. The marketing campaign should include (i) On site marketing boards displayed throughout the period in which the property is being marketed (ii) Registration on the Council's Commercial Property Database (iii) Web based marketing. Site particulars should include (i) Location Plan and description of the site (ii) Marketed Use of the Site including all options available to future owners (iii) Relevant Dimensions (iv) Relevant planning conditions or covenants (v) Known Costs."</u></p>
MM11	31	5.3	<p>Amend paragraph 5.3 as follows:</p> <p>The <u>Rowden Park</u> site divides into three distinctive areas that will each help to retain the mature network of hedgerows and trees which with areas of greenspace will</p>

			provide linkages through development to the wider countryside and retain the distinctive enclosed mature setting to the landscape. <u>Master plan work must address environmental issues around Patterdown Rifle Range operating within the allocation.</u> Detailed design should <u>also</u> recognise the generally higher level of the road to the town."
MM12	31	5.5	<p>Amend paragraph 5.5 as follows:</p> <p>The proposals include provision of a large area of informal open space that includes the <del>historic features assets and</del> landscape setting to the Rowden Conservation Area. <del>Development should be set back from the edge of Rowden Conservation Area. Layout and design must preserve the importance of agricultural land as a setting contributing to the significance of Rowden manor and farm.</del> The surrounding agricultural land contributes to the significance of Rowden Manor and farm, and the character and appearance of the Rowden Conservation Area. To ensure the <u>significance of those affected heritage assets are safeguarded a further more detailed Historic Environment Setting Assessment will be required to inform the future Masterplan and the layout, design and appropriate distance of development from the boundary of the Conservation Area.</u> Enhancing the attractiveness and improving access to this area will realise this area's potential as an asset to the town for informal recreation and leisure. This includes interpretation of the Civil War battlefield and the buildings and setting to Rowden Manor. <del>These elements will be considered in detail as a part of a historic assessment of the site which will inform the master plan.</del></p>
MM13	31	5.6	<p>Amend paragraph 5.6 as follows:</p> <p>"Land will be reserved within the <del>scheme</del> <u>Rowden Park site</u> for a two form entry primary school. The estimated needs generated by the development <u>of the main site itself</u> do not by themselves require two forms of entry but reserving land allows for future expansion <u>to accommodate the needs from development elsewhere</u> or <del>likely</del> beyond the plan period."</p>
MM14	31	5.7	<p>Amend paragraph 5.7 as follows:</p> <p>"A <u>If a river footbridge is considered as part of the master plan process</u> it should be</p>

			located as sensitively as possible to avoid impact on riparian habitats and provide improved pedestrian and cycle links to the town centre avoiding busy roads <u>and bat flight lines</u> . A riverside country park will be managed to promote good pedestrian and cycle access to and from the town centre. <u>Opportunities should also be explored to improve connections from the site to the Methuen Business Park</u> "
MM15	31	5.8	Additional sentence at the beginning of the paragraph 5.8: <u>"Development plan policies <sup>(1)</sup> set out requirements for the additional open space and formal sports provision that will be necessary as a part of all new residential development."</u>
MM16	31	5.9	Amend first sentence of paragraph 5.9 as follows:  <u>"The Pudding Brook area should be protected from development. The precise flood zone boundaries to the Pudding Brook will need to be defined and protected from development."</u>
MM17	32	5.10	Amend paragraph 5.10 as follows:  <u>"Flood risk areas (zones 2 and 3) must remain undeveloped. This includes areas around smaller water courses within the site for which flood risk will also need to be assessed alongside the main river. Pudding Brook is one such area. <del>Any development impinging on designated groundwater Source Protection Zones must follow principles and practice necessary to safeguard them.</del> Rates of surface water run off to the River must also remain at current levels or less in order to reduce the risk of flooding elsewhere. Consideration of flood risk and necessary improvements to the drainage network must precede detailed development proposals. <del>Any improvements to the water supply and foul drainage network should also be put in place at the earliest opportunity.</del> This must involve determining accurate boundaries to flood risk areas and a set of effective sustainable urban drainage measures. <u>These must take account of ground conditions and ensure sufficient land is set aside at the master plan stage. Any improvements to the water supply and foul drainage network should be put in place at the earliest opportunity. Any development impinging on designated groundwater Source Protection Zones must follow principles and practice necessary to safeguard them.</u>"</u>
MM18	32	CH2	Amend Policy CH2 as follows:

			<p>Rawlings Green</p> <p>Approximately 50ha of land at Rawlings Green, as identified on the policies map, is proposed for a mixed use development to include the following:</p> <ul style="list-style-type: none"> <li>• <u>No more than 650 dwellings, including a first phase of no more than 200 dwellings</u></li> <li>• 5ha of land for employment generating uses (B1, B2, C2, D1 and D2 of the Use Classes Order)</li> <li>• Land for a 2 Form Entry primary School</li> <li>• <u>Distributor standard road A Link Road from the B4069 Parsonage Way to Darcy Close, including connection over the main railway line, and a road from this distributor standard road to Darcy Close (Cocklebury Link Road) to be completed and open for use as part of the first phase of development</u></li> <li>• Strategic landscaping and open space to retain and reinforce existing hedgerows and establish new areas of substantial planting, <u>including strong groups of new tree planting along the lower eastern edge of development, in accordance with the principles set out at paragraph 5.12</u></li> <li>• <u>An approximately 10 ha Country Park along the northern and eastern edge of new development linking to the existing recreation areas along the river to Monkton Park as indicated in Figure 5.2. No new buildings should be located in the Country Park unless they are ancillary to the use of the Country Park, or to the east of the 50m contour.</u></li> </ul> <p>Development will be subject to the following requirements:</p> <ol style="list-style-type: none"> <li>1. Surface water management that achieves equivalent or less than current Greenfield rates of run-off</li> <li>2. <u>the connection to Darcy Close and a road crossing of the railway to be open for use before the completion of the, Completing a link between Cocklebury Road and the B4069 to be open for use, prior to the occupation of 200th dwellings, secured through measures attached to grant of planning permission</u></li> </ol>
--	--	--	---

			<ol style="list-style-type: none"> <li>3. <u>Development beyond the first phase of 200 dwellings shall not commence before the link road to the A350 is open for use or a set of comprehensive transport improvement measures of equivalent benefit is in place</u></li> <li>4. <del>Financial contributions towards provision of new schools</del> <u>Provision of sufficient school capacity to meet the needs created by the development</u></li> <li>5. a low density design and layout that preserves the setting and importance of listed buildings on the site <u>and, in accordance with principles set out in paragraph 5.12, screens and filters existing and proposed locations for mixed use development and avoids harmful visual impacts by development on exposed valley slopes</u></li> <li>6. <u>Design and layout of development must not prohibit a potential future road connection to land across the river to the south-east</u></li> </ol> <p>All other aspects of development will take place in accordance with a master plan for the site approved by the Council prior to commencement. <u>The master plan will be informed by detailed evidence which will include a Landscape Visual Impact Assessment, Heritage Assessment, Biodiversity Report, Surface Water Management plan, Flood Risk Assessment and Highways Statement."</u></p>
MM19	33	Figure 5.2	<p>Amend Figure 5.2 as set out in Appendix 1.</p> <p>Amendment identifies the Cocklebury Link Road, includes land in the Country Park area adjacent to the river up to the 50 m contour and amends the mixed use area to include land within the proposed Cocklebury Link Road.</p>
MM20	34	5.11	<p>Amend paragraph 5.11 as follows</p> <p><u>"Connection to the drainage network will also require enhancements off site. Any improvements to the water supply and foul drainage network need to be put in place at the earliest opportunity.</u> Consideration of flood risk and necessary improvements to the drainage network must precede detailed development proposals. This must</p>

			involve determining accurate boundaries to flood risk areas and a set of effective sustainable urban drainage measures. <u>These must take account of ground conditions and ensure sufficient land is set aside at the master plan stage.</u> "
MM21	34	5.12	Amend paragraph 5.12 as follows:  "The site is prominent to a wide area. It forms a backdrop for westerly views from the River Avon floodplain, public rights of way, Tytherton Lucas and the Limestone Ridge. Development must avoid adversely affecting the rural and remote character immediately around the site and increasing the visual prominence and urban influence of Chippenham over a much wider area. <u>In particular, development must have appropriate regard to the setting of Langley Burrell and Tytherton Lucas conservation areas beyond the site, as well Rawlings Farm, a listed building within. A strategic landscape scheme should:</u> "
MM22	35	5.16	Amend paragraph 5.16 as follows  Land will be reserved within the scheme for a two form entry primary school. The estimated needs generated by the development itself do not by themselves required two forms of entry <del>but reserving land for future expansion likely beyond the plan period</del> <u>this school will also be necessary to meet needs generated by development at North Chippenham.</u>
MM23	35	5.16	Additional sentence to paragraph 5.16 as follows  <u>"Development plan policies <sup>(1)</sup> set out requirements for the additional open space and formal sports provision that will be necessary as a part of all new residential development."</u>
MM24	35	5.17	Amend paragraph 5.17 as follows:  "The site is reasonably well located in relation to the town centre and development should include measures to enable as many trips as possible to the town centre to take place on foot, cycling or by public transport. <u>This should include enhancing the attractiveness of the North Wiltshire Rivers Way.</u> Open space will provide a connection to the river as a corridor for pedestrian and cycle access to the town centre. Nevertheless the site's location will inevitably place strains upon existing

			<p>traffic corridors into and out of the existing built up area, parts of which are already congested. The completion of new traffic routes including a bridge over the railway will do much to address such problems and ultimately should improve existing conditions. This new road infrastructure structure therefore needs to be provided as soon as possible. <u>Road proposals should demonstrate how the design of the route minimises visual impact and effects on local amenity"</u></p>
MM25	35	5.18	<p>Additional sentence to paragraph 5.18 as follows:</p> <p><u>"Land will be reserved in the vicinity of the eastern <del>western</del> site boundary to facilitate the construction by a third party of a road over the river so as not to prohibit a future road connection to land to the south-east should one be required in future plan periods. <del>bridge to enable the Eastern Link Road to be completed.</del> Provision will be made within a legal obligation to ensure that the connection is deliverable by a third party without land ransom if required in the future."</u></p>
MM26	35	5.18	<p>Add additional sub-heading and paragraphs after paragraph 5.18</p> <p><u>"Cocklebury Link Road</u>  <u>5.18a Rawlings Green is of a scale that it is necessary for it to have at least two different points of access.</u></p> <p><u>5.18b It would not be acceptable for Rawlings Green to have one point of access to serve 650 dwellings. Neither, given its scale and location, would it be acceptable for it to be served by a second access which does not connect through to the first. <del>just two accesses.</del> Development of the site requires construction of a completed link road from Cocklebury Road via Darcy Close and a new bridge over the railway to Parsonage Way and the B4069 as an essential part of the first phase of development. The link road from the B4069 to the A350 must also be open to traffic or a set of comprehensive transport improvement measures of equivalent benefit must be in place prior to any development commencing beyond the first phase of development of the Rawlings Green site.</u></p> <p><u>5.18c The overall result is a new route around Chippenham; a Cocklebury Link Road. This is necessary for development to be acceptable and is directly related to the</u></p>

		<p><u>development, appropriate in scale and kind. It will be an express part of any development scheme permitted and built by the site's developers.</u></p> <p><u>5.18d Road improvements through Monkton Park have been carefully considered recognising the sensitivity of traffic levels to residents and the potential to worsen existing issues such as congestion and on-street parking.</u></p> <p><u>5.18e Inevitably there are shorter term impacts before the link road is complete. In the absence of the Cocklebury Link Road, development at the 200 dwelling threshold for Rawlings Green is forecast to lead to a 30% increase in traffic flows on Cocklebury Road and up to a 55% increase in delay time experienced on the approach to the New Road / Station Hill junction, compared to the existing situation. This is expected to be a short term impact, as the Cocklebury Link Road would need to be open beyond the 200 dwelling threshold. Appropriate mechanisms will be attached to any planning permission to secure the delivery of the Cocklebury Link Road within a certain time based on the occupancy of dwellings and a time period. Conditions attached to the permission (for example which requires a phasing plan) or a Section 106 Agreement (which can be linked to a bond) are options available to the Local Planning Authority to secure timely delivery of the road. In implementing the Plan the Council will monitor the delivery of the necessary infrastructure to ensure that development comes forward in a timely and coordinated fashion. It will, with its partners, play a pro-active role in collaboration with developers to ensure the completion of the new link road to the A350 and the railway bridge. In this regard, it will use its powers, including its ability to resolve financial imbalances, for example by providing early funding to accelerate the provision of infrastructure or in circumstances where delivery is significantly delayed and there are no other options, by using its compulsory purchase powers.</u></p> <p><u>5.18f. Once complete and the benefits of the Cocklebury Link Road, in particular for residents of Monkton Park, are:</u></p> <ul style="list-style-type: none"> <li>• <u>In pure infrastructure terms, the Cocklebury Link Road doubles road capacity for traffic entering and leaving the existing Monkton Park area – there would be two single-carriageway routes rather than the present one</u></li> </ul>
--	--	--



			<p>single-carriageway route;</p> <ul style="list-style-type: none"> <li>• <u>With the Cocklebury Link Road open and 650 dwellings at Rawlings Green, traffic flows and delays on Cocklebury Road / Station Hill are forecast to be at levels that are similar to those experienced now; and</u></li> <li>• <u>Traffic modelling evidence justifies a threshold for completion of the CLR, at the latest, by the occupation of 200 new dwellings served via Darcy Close. This is a requirement of the proposal. Sufficient commercial incentive exists to ensure that developer will comply. The delivery framework explains responsibilities and additional steps necessary to co-ordinate timely completion.</u></li> </ul> <p>5.18g. The policies map shows geographically an alignment for the road."</p>
MM27	36	CH3	<p>Delete Policy CH3</p> <p>East Chippenham</p> <p><del>Approximately 91ha of land at East Chippenham, as identified on the policies map, is proposed for a mixed use development to include the following:</del></p> <ul style="list-style-type: none"> <li>• <del>850 dwellings</del></li> <li>• <del>approximately 5ha of land for employment (B1 and B2 of the Use Classes Order) with a further 15ha safeguarded for employment development beyond 2026</del></li> <li>• <del>land for a 2 Form Entry primary school</del></li> <li>• <del>a local centre</del></li> <li>• <del>2.5ha safeguarded for the expansion of Abbeyfield School</del></li> <li>• <del>That part of the Eastern Link Road distributor standard road from between the north-western boundary side of the site to and the A4, including connection a bridge over the River Avon connecting with the Rawlings Green site distributor road. (an Eastern Link Road)</del></li> <li>• <del>strategic landscaping and open space to retain and reinforce existing hedgerows, establish new areas of substantial planting and landscaping, and to provide a visual boundary to the town along the route of the Eastern Link Road</del></li> <li>• <del>a an approximately 35ha Country Park along the western side of new</del></li> </ul>

			<p>development</p> <ul style="list-style-type: none"> <li>no more than 400 homes to be completed occupied before the Cocklebury Link Road is open for use.</li> </ul> <p>Development will be subject to the following requirements:</p> <ol style="list-style-type: none"> <li>surface water management that can achieve less than current Greenfield rates of run-off and decreases flood risks</li> <li>a road crossing of the River Avon open for use before the <u>completion occupation</u> of the 400th dwelling</li> <li>the Eastern Link Road open for use <u>in its entirety between the A350 Malmesbury Road and the A4 by completion the occupation</u> of the 750th dwelling</li> <li>serviced land for employment is available for development before the completion of the 50th dwelling</li> <li><u>financial contributions toward provision of new schools provision of sufficient school capacity to meet the need created by the development</u></li> <li>a design and layout that preserves the setting and importance of listed buildings on the site</li> </ol> <p>All other aspects of development will take place in accordance with a masterplan for the site approved by the Council prior to commencement. <u>The master plan will be informed by detailed evidence which will include a Landscape Visual Impact Assessment, Heritage Assessment, Biodiversity Report, Surface Water Management plan, Flood Risk Assessment and Highways Statement."</u></p>
MM28	37	Figure 5.3	Delete figure 5.3
MM29	38 - 39	5.19 – 5.31	<p>Delete paragraphs 5.19 to 5.31 inclusive.</p> <p>5.19 A site is identified beyond the valley of the River Avon east of Chippenham. Flood risk areas (zones 2 and 3) that separate it from the town must remain undeveloped. This area plays an important role providing water storage that helps to protect the town from flooding. In recent times the town's protection has failed and development is a means to reduce risks for existing residents and business as well</p>

		<p>as protect the new uses that will occupy this site. Rates of surface water run-off to the River must be less than current levels in order to reduce the risk of flooding elsewhere. Connection to the drainage network will also require enhancements off site. <u>Any improvements to the water supply and foul drainage network need to be put in place at the earliest opportunity.</u> Consideration of flood risk and necessary improvements to the drainage network must precede detailed development proposals. This must involve determining accurate boundaries to flood risk areas, and a set of effective sustainable urban drainage measures. <u>A sustainable urban drainage system will need to be designed and built to take into account 'clayey-loamey' ground conditions and sufficient land outside flood risk areas will need to be set aside at the master plan stage.</u></p> <p><u>5.19a Land will be reserved in the vicinity of the eastern site boundary to facilitate the construction by a third party of a road over river bridge to enable the Eastern Link Road to be completed. Provision will be made within a legal obligation to ensure that the connection is deliverable by a third party without land ransom.</u></p> <p>5.20 Two areas of land are proposed for employment generating uses. A smaller area will provide for needs within the Plan period to 2026 and a second larger area is safeguarded for development focussing on needs up to and beyond 2026. The timing of its development and attractiveness to the market will depend upon a road connection to the A350 and M4 via completion of that part of an Eastern Link Road.</p> <p>5.21 The Council with its partners will play a proactive role in partnership with developers in order to ensure employment development can take place, by marketing the site, brokering discussions with interested business and exploring other initiatives in collaboration with the Local Enterprise Partnership. Development of the site will deliver serviced land, with road access, utilities and communications infrastructure. A southern area accessed via the A4 will be a first phase of development.</p> <p>5.22 The site is in a landscape which is strongly associated with the River Avon. Its development also needs to provide a new rural edge to east Chippenham when</p>
--	--	---

viewed from surrounding footpaths in the landscape and from higher ground. Large scale woodland is not characteristic of this landscape but would be required to adequately screen large scale employment development and provide a strong visual boundary to the site. Development should avoid high ground, retain the rural approach along Stanley Lane and reinforce a wooded and riparian character along the Avon valley.

5.23 A strategic landscape scheme should:-

- Reinforce planting along the existing edges of Chippenham and adjacent to the North Wiltshire Rivers Route to reduce the glimpses of the urban edge from the wider countryside and especially in views from public rights of way close to Tytherton Lucas to help reinforce its rural and remote character;
- Extend and manage linear woodlands along the edge of the River Avon to help with screening, filtering and backgrounding of views towards existing (Chippenham) and proposed development;
- Create bold landscape structure by reinforcing existing field boundaries with new hedgerow and tree planting and where possible creation copses and linear woodlands. Development to be inserted within the bold landscape structure;
- Seek opportunities to reinforce the riparian character along the River Avon and River Marden including waterside meadows, areas of tree planting and areas for SuDS;
- Maintain the network of Public Rights of Way, set within green corridors through the landscape to preserve the existing good links from Chippenham to the river and countryside to the east and to help integrate proposed development within the landscape;
- Conserve and enhance the setting to the listed building at Harden's Farm; and
- Conserve and enhance the setting (including mature trees) of New Leaze Farm located on higher ground.
- Development is envisaged within a strong landscape framework. Land

			<p>north of the North Wiltshire River Route is particularly sensitive in landscape terms and the capacity for developing in this area should be considered using a lower density of 30 dwellings per net hectare.</p> <p>5.24— Development is envisaged within a strong landscape framework. Land north of the North Wiltshire River Route is particularly sensitive in landscape terms and the capacity for developing in this area should be considered using a lower density of 30 dwellings per net hectare.</p> <p>5.25— Development should include a hedgerow, woodland or tree-lined corridor from the stream adjacent to Abbeyfield School to the stream to the east near Hither Farm in order to restore ecological connectivity. It should also enhance the North Wiltshire Rivers Route for biodiversity gains through appropriate planting and management</p> <p>5.26— The Riverside Park offers an opportunity to restore riparian and floodplain habitats, including the field boundary hedgerows, which appear to have been lost in most of the fields between Harden's Farm and the River Avon. All floodplain habitats should be restored and enhanced through appropriate management. Parts may have reduced public access in some more sensitive areas in order to safeguard protected species.</p> <p>5.27— The River Avon (Bristol) County Wildlife Site must also be protected from development (and associated impacts such as pollution).</p> <p>5.28— <u>Development plan policies set out requirements for the additional open space and formal sports provision that will be necessary as a part of all new residential development</u> Land will be reserved within the scheme for a two form entry primary school. The estimated needs generated by the development itself do not by themselves require two forms of entry but reserving land allows for future expansion beyond the plan period. There is some capacity to accommodate additional students at Abbeyfield School, the nearest secondary school. This school may also need to expand in the future, in all likelihood beyond the plan period. To prevent losing this opportunity some land should therefore remain reserved to prevent the campus</p>
--	--	--	---

			<p>becoming restricted by new development.</p> <p>5.29 The site is reasonably well located in relation to the town centre and development should include measures to enable as many trips as possible to the town centre to take place on foot, cycling or by public transport. The riverside park would be central to creating attractive routes for walkers and cyclists. The pedestrian and cycle network should also be improved, <u>through the enhancement of the existing and provision of new routes, to retain the attractiveness of the Chippenham – Calne cycleway and in particular specifically to increase the accessibility of Abbeyfield School, Stanley Park and the riverside to the existing urban area.</u></p> <p>5.30 Development is expected to commence from a southern access to the A4. <u>Evidence on the impacts of development of this site and elsewhere shows that new road infrastructure needs to be provided as soon as possible in order to prevent unacceptable impacts on the network.</u> This will inevitably put an additional burden on this corridor into the town. Completion of a <u>the Cocklebury Link Road link and an the eEastern lLink rRoad</u> around the town to the A350 north of the town will do much to tackle pressures from additional traffic. Transport assessments suggest that up to 400 new dwellings should <u>can</u> be provided before the Cocklebury <u>Link Road</u> Link should be in place. A new bridge over the River Avon can then connect to <u>the Rawlings Green part of this infrastructure and the rates and quantum of</u> development can then increase. An Eastern Link <u>rRoad</u> to the A4 will be built in step with development and need to be in place by the completion of the 750th dwelling.</p> <p>5.31 Evidence on the impacts of development of this site and elsewhere shows that new road infrastructure needs to be provided as soon as possible in order to prevent unacceptable impacts on the network. Consequently, to ensure timely delivery, a road bridge across the River Avon should in place by the occupation of the 400th dwelling and an eastern link road connecting to the A4 by the occupation of the 750th dwelling</p>
MM30	40	5.33	Amend paragraph 5.33 as follows:

		<p>"In order to ensure these objectives are achieved in a complementary and comprehensive manner the management and use of new country parks will be directed by a management plan that will be approved by Wiltshire Council with the involvement of local stakeholders and land owners alongside specialist interests such as the Wiltshire Wildlife Trust. <del>The precise boundaries for the country parks will be determined as part of the management plan process. Master Plans for each strategic site proposal (CH1-23) will define the precise boundaries to country parks and will show pedestrian and cycle routes across them necessary to connect the new development to the town centre and to other key destinations elsewhere and necessary for it to proceed.</del></p> <p><del>Indicative areas</del> <u>The proposed country park areas are shown on the policies map and in Figures 5.1 and 5.2. and 5.3 above</u> It is envisaged that the long term management of the country parks will be secured through planning obligations relating to individual sites. <u>Further work is being undertaken to develop the ownership, governance and detailed management of the Country Parks."</u></p>
MM31	40	<p>Insert new paragraphs 5.34 and 5.35 with footnotes.</p> <p><u>Strategic Transport Network (A350 at J17 of M4)</u></p> <p><u>5.34 The strategic transport network is illustrated in Figure 4.1a of the Wiltshire Core Strategy (Footnote) and includes the M4 in Wiltshire as part of the Strategic Road Network (SRN) and the A350 as part of the Primary Route Network (PRN). Core Policy 66 of the Wiltshire Core Strategy establishes a commitment to maintain, manage and selectively improve the A350 corridor to support development growth at Chippenham, Melksham, Trowbridge, Westbury and Warminster and maintain and enhance journey time reliability.(Footnote) In addition, as recognised at paragraph 2.16 of the Plan, the Swindon and Wiltshire Local Enterprise Partnership prioritise investment in improvements to the A350 which has resulted in the partnership securing funding for a A350 Improvement package through the Growth Deal.(Footnote)</u></p> <p><u>5.35 Working in conjunction with Highways England, evidence has shown that the</u></p>

			<p>proposals of the Plan will have a cumulative severe impact on Junction 17 of the M4 which will result in queuing on both the M4 mainline and the A350 at Junction 17 by 2026. This presents both a safety issue and operational performance issue which will result in reduced journey time reliability and potential for increased vehicle conflict on the high speed network.</p> <p><u>5.36 Wiltshire Council and Highways England recognise the need for the part signalisation of the junction to resolve these issues. Design and delivery of the proposed work will be agreed with Highways England and set out within the Chippenham Transport Strategy. Detailed work is being undertaken to implement a scheme within the current highway which incorporates protection for the geological SSSI associated with the west bound of slip road.</u></p> <p>Footnote:</p> <ul style="list-style-type: none"> <li>• <u>Wiltshire Core Strategy Figure 4.1a Wiltshire Key Diagram (Strategic Transport Network)</u></li> <li>• <u>Wiltshire Core Strategy core policy 66 and paragraph 6.174</u></li> <li>• <u>3. Swindon and Wiltshire Strategic Economic Plan: Swindon and Wiltshire Secure £129 million Growth Deal, 19 December 2014</u></li> </ul>
MM32	41	Table 6.1	Replace table 6.1 as shown in appendix 1
MM33	42	6.4 – 6.6	<p>Amend paragraphs 6.4 – 6.6</p> <p><del>"6.4 In June 2014 2015, Wiltshire Council submitted adopted a Community Infrastructure Levy (CIL) Draft Charging Schedule for independent examination Wiltshire Community Infrastructure Levy. CIL is a charge that local authorities in England can place on development in their area. The money generated through the levy will contribute towards the funding of infrastructure to support growth. From April 2015, The council will be is restricted in its ability to pool infrastructure contributions from new development through the existing mechanism of Section 106 agreements.</del></p> <p>6.5 The <del>Draft</del> Charging Schedule <del>proposes</del> has differential charging rates based on the type and location of development. The <del>Draft</del> Charging Schedule also <del>proposes</del></p>



			<p><u>has a reduced CIL rate for residential development within the strategically important sites as identified in the Wiltshire Core Strategy. This is due to the higher cost of delivering the critical on-site infrastructure needed to unlock the development potential of these strategically important mixed use sites. However, as a result of the removal of the Chippenham strategic sites formerly allocated in the Core Strategy, there <del>would</del> <u>is</u> not be a reduced rate for the sites identified in this Chippenham Site Allocations Plan. <u>To reflect the fact that the standard rate of CIL is to be charged for the strategic sites in Chippenham, the Council is seeking fewer off site funding contributions than usual because a much higher proportion of infrastructure investment will need to be sourced from the CIL. This avoids an unacceptable burden on developers but necessitates much closer collaboration and co-ordination around how CIL funds are used to support growth. As such, the council has proposed a change to the draft charging schedule through the CIL examination process so that the lower rates of CIL will apply to the allocations in the CSA Plan.</u></u></p> <p><del>6.6 An independent examiner, appointed to review the CIL rates proposed in Wiltshire, in January 2015 held two days of hearing sessions to consider the Draft Charging Schedule (and subsequent modifications) published by Wiltshire Council. Once the examiners report has been received, the council plans to adopt and formally implement the CIL charging schedule by April 2015. Planning applications determined after the published implementation date will, if approved, be liable to pay CIL."</del></p>
MM34	43	6.10, 6.11 and Table 6.2	<p>Delete paragraphs 6.10 – 6.11 and table 6.2.</p> <p><del>Sites subject to Section 106 agreement</del></p> <p><del>6.10 Planning applications determined by the local authority prior to the implementation of CIL cannot be charged this levy. The infrastructure needed to make the development of the North Chippenham and Hunters Moon sites acceptable will instead be secured via a Section 106 planning obligation agreement negotiated between the council and applicant.</del></p> <p><del>6.11 The housing delivery trajectory for these sites is set out below.</del></p>

			Table 6.2 Housing delivery trajectory for North Chippenham and Hunter's Moon sites		
			Year	Land at North Chippenham (Area A)	Hunters Moon
			2015		
			2016	50	104
			2017	100	80
			2018	100	80
			2019	100	80
			2020(44)	100	80
			2021	100	26
			2022	100	
			2023	100	
			2024		
			2025		
			2026(45)		
			2027		
			2028		
			2029		
			TOTAL	750	450
MM35	43	6.9	Amend reference in paragraph 6.9 as follows:  "The study concluded that the proposed site allocations identified within CSA Plan are deliverable within the current policy context and on the basis of the general assumptions made in the report including in relation to land values and house prices (43)"  (43) (Chippenham Sites Allocations Plan: Strategic Site Viability Assessment, January 2015 April 2016)		
MM36	44	6.14	Insert new paragraphs 6.14 a and 6.14b:  "6.14a To monitor the implementation of the CSAP the Council already has in place		

			<p><u>the Wiltshire Monitoring Framework (WMF) which was developed to support policies in the Wiltshire Core Strategy. The WMF is reported on in the Annual Monitoring Report (AMR). In relation to Chippenham the following indicators are included based on the Wiltshire Core Strategy proposals for the community area:</u></p> <ul style="list-style-type: none"> <li>• <u>Permissions granted or refused that support policy</u></li> <li>• <u>NOMIS official labour market statistics (e.g. Ratio of resident workers to jobs).</u></li> <li>• <u>% of new and converted dwellings on previously developed land.</u></li> <li>• <u>Quantum of houses and employment land delivered since the start of the plan period.</u></li> </ul> <p><u>In relation to the delivery of employment land the WMF also includes data collection on the quantum of land developed for employment by type across the whole of Wiltshire.</u></p> <p><u>6.14b The indicators listed above remain relevant to the delivery of the Chippenham Site Allocations Plan and will monitor the delivery of housing, employment land and the employment led strategy. In order to provide greater clarity for when a review of the Plan should be triggered and to ensure infrastructure is provided in a timely manner the following additional indicator will be added to the Wiltshire Monitoring Framework.</u></p> <p><u>Indicator: Average annualised total completions from allocated sites</u>  <u>Target: 162 (1,780/11) dpa.</u>  <u>Triggers for review (including assessing need to respond to any barriers to growth):</u></p> <ul style="list-style-type: none"> <li>a) <u>3 consecutive years where delivery of housing from the allocated sites fall below 162 dwellings per annum following the adoption of the CSAP starting from 2018.</u></li> <li>b) <u>b) Fewer than <del>800</del> 480 dwellings built from within Chippenham site allocations by 2020"</u></li> </ul>
MM37	45	6.15	<p>Amend Table Caption and add new paragraph 6.15a as follows:</p> <p><u>"Risk Management</u></p>

		<p><u>A part of monitoring the effectiveness of the Plan will be to maintain a risk register. An outline of main risks is as shown in the table below. It will be a task of the group to manage risks by identifying responsibilities and different mitigation measures that are either preventative or contingencies."</u></p> <p>Insert table 6.3: Chippenham Outline Risk Register (See Appendix 1)</p>
MM38	51	<p>Add a glossary of terms as follows:</p> <p><u>Briefing Notes: A series of notes to provide background information on a number of recurring questions about the content of the plan and the process for preparing the plan</u></p> <p><u>Cocklebury Link Road: A road from Parsonage Way, over the railway line and via Darcy Close to Cocklebury Road that provides a second access to Monkton Park.</u></p> <p><u>Core Strategy: A Development Plan Document setting out the spatial vision and strategic objectives of the planning framework for an area, having regard to the Community Strategy.</u></p> <p><u>Eastern Link Road: A distributor Standard road between the A350 Malmesbury Road and the A4.</u></p> <p><u>Examination in Public (EiP): An independent examination of draft plans.</u></p> <p><u>Evidence Papers: a set of documents that summarises the information described in the Strategic Site Assessment Framework. Separate evidence papers cover each of the Chippenham Core Strategy Criteria.</u></p> <p><u>Site Selection Report: A report explaining the Council's choices of preferred areas and site options drawing on evidence guided by the Strategic Site Assessment Framework and Chippenham Core Strategy Criteria.</u></p> <p><u>Strategic sites: Major development that delivers a mix of uses, critically local</u></p>

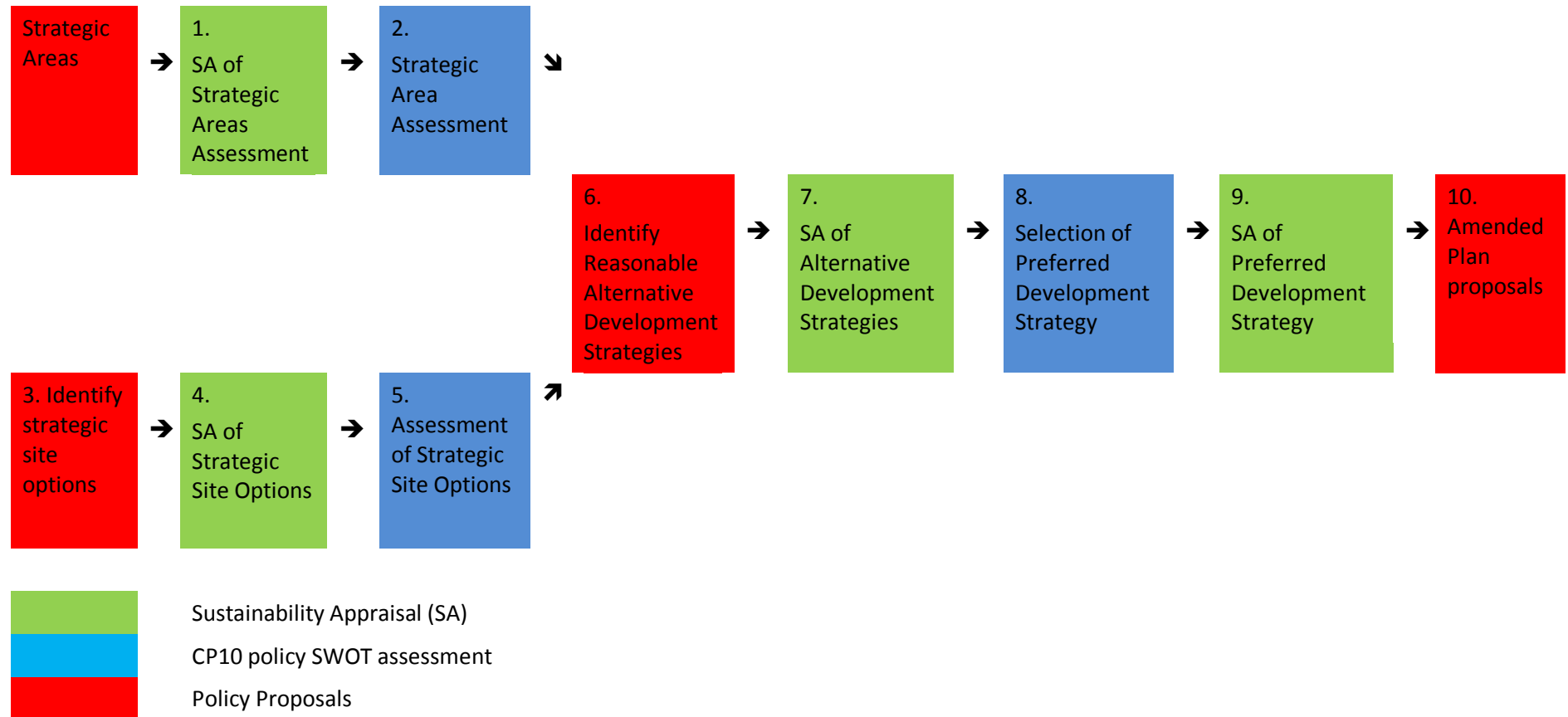
		<p><u>employment as well as homes, but also all the infrastructure (for example: primary schools, community facilities, formal and informal recreation facilities and often local shops and services) necessary to support the development of the site and wider impacts of significant growth (often funding contributions to facilities and infrastructure elsewhere made necessary by needs arising from development, for example, leisure facilities or bus services)</u></p> <p><u>Sustainability Appraisal (SA): An appraisal of the impacts of policies and proposals on economic, social and environmental issues.</u></p> <p><u>Strategic areas: The different broad directions for long term growth at Chippenham. Five areas have been identified for assessment. They are defined by significant obstacles to development such as transport corridors and the river and included on a diagram in suggested changes to the Wiltshire Core Strategy.</u></p> <p><u>Site options: detailed proposals for strategic sites. Located within a strategic preferred area, their extent is shown on an ordnance survey base. These include an estimated number of new homes and the area that will be developed for new employment. The proposals also include specific requirements for new infrastructure necessary to serve the development and other requirements to ensure it takes an acceptable form.</u></p> <p><u><del>Preferred area: The strategic area (or areas) that perform best when considered by the strategic site assessment framework and sustainability appraisal.</del></u></p> <p><u>Strategic site assessment framework: How each of the six criteria set in the Wiltshire Core Strategy will be used to assess site options and strategic areas.</u></p> <p><u>The Chippenham 'core strategy' criteria (CP10 criteria): The six criteria setting out the principles guiding the selection of strategic sites around Chippenham, as established in Core Policy 10 (the Chippenham Area Strategy) of the Wiltshire Core Strategy."</u></p>
--	--	---



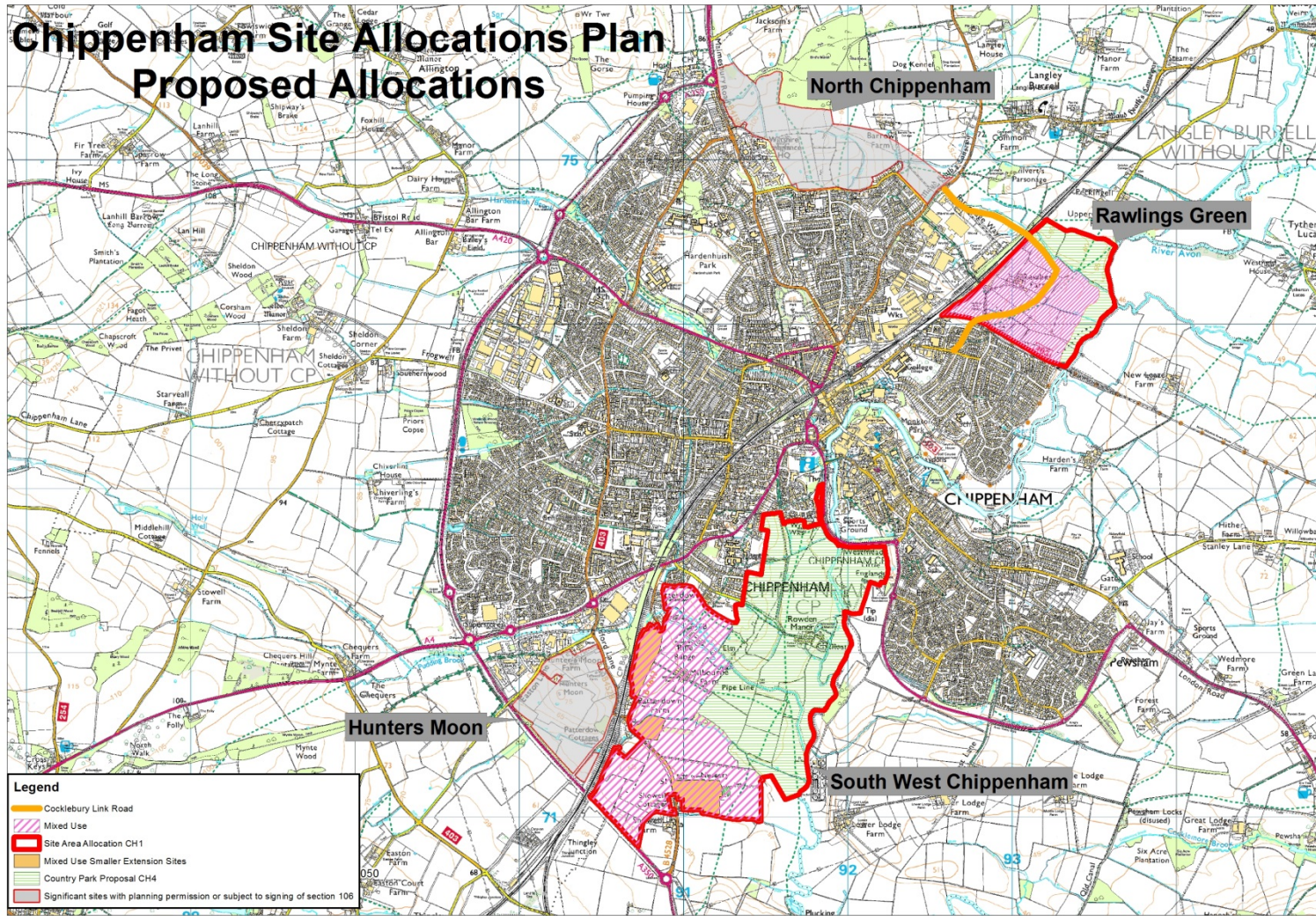
Appendix 1

MM5 Insert new Diagram 1 after paragraph 4.15:

Plan Preparation Steps

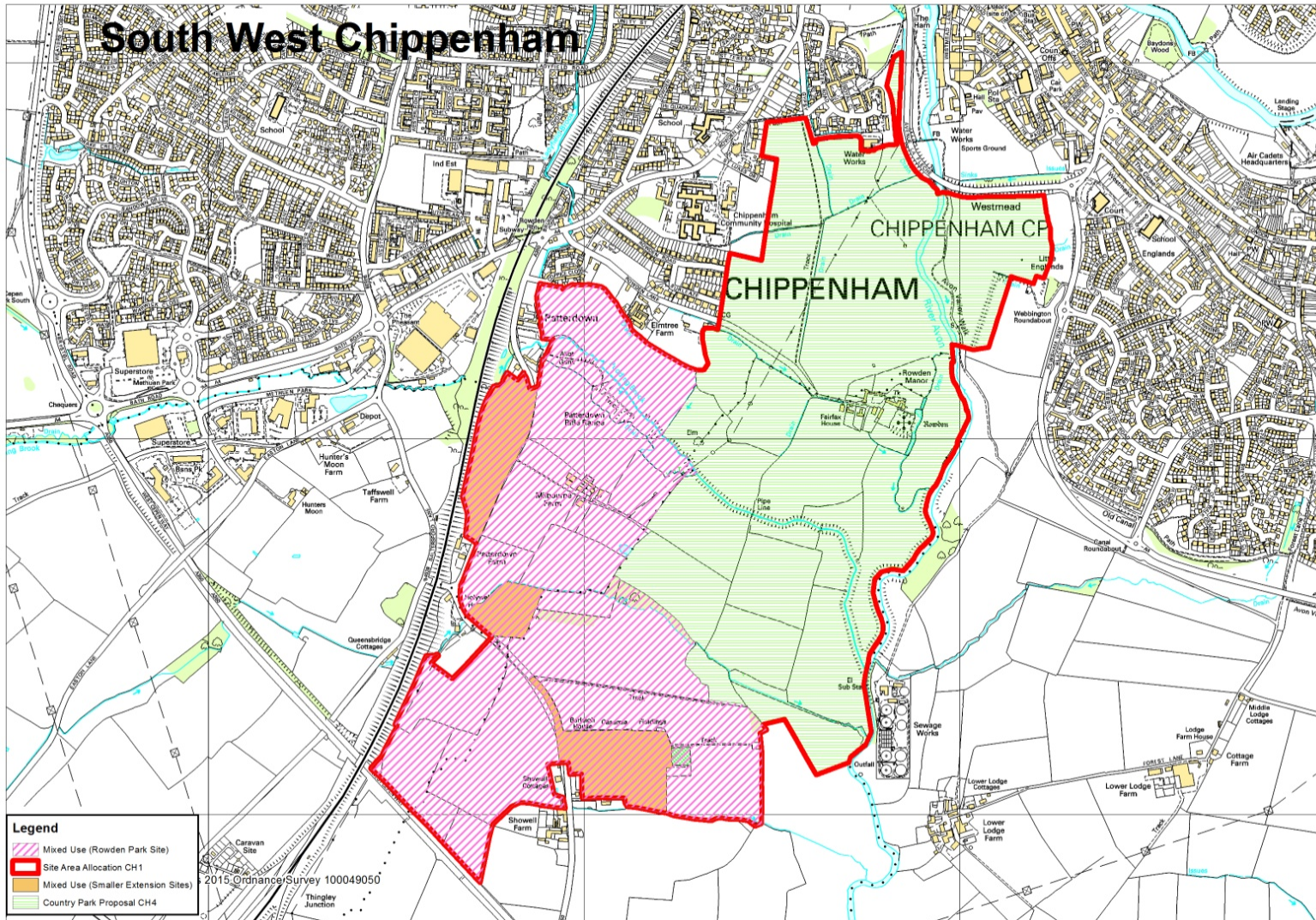


MM6 Replace Figure 4.1

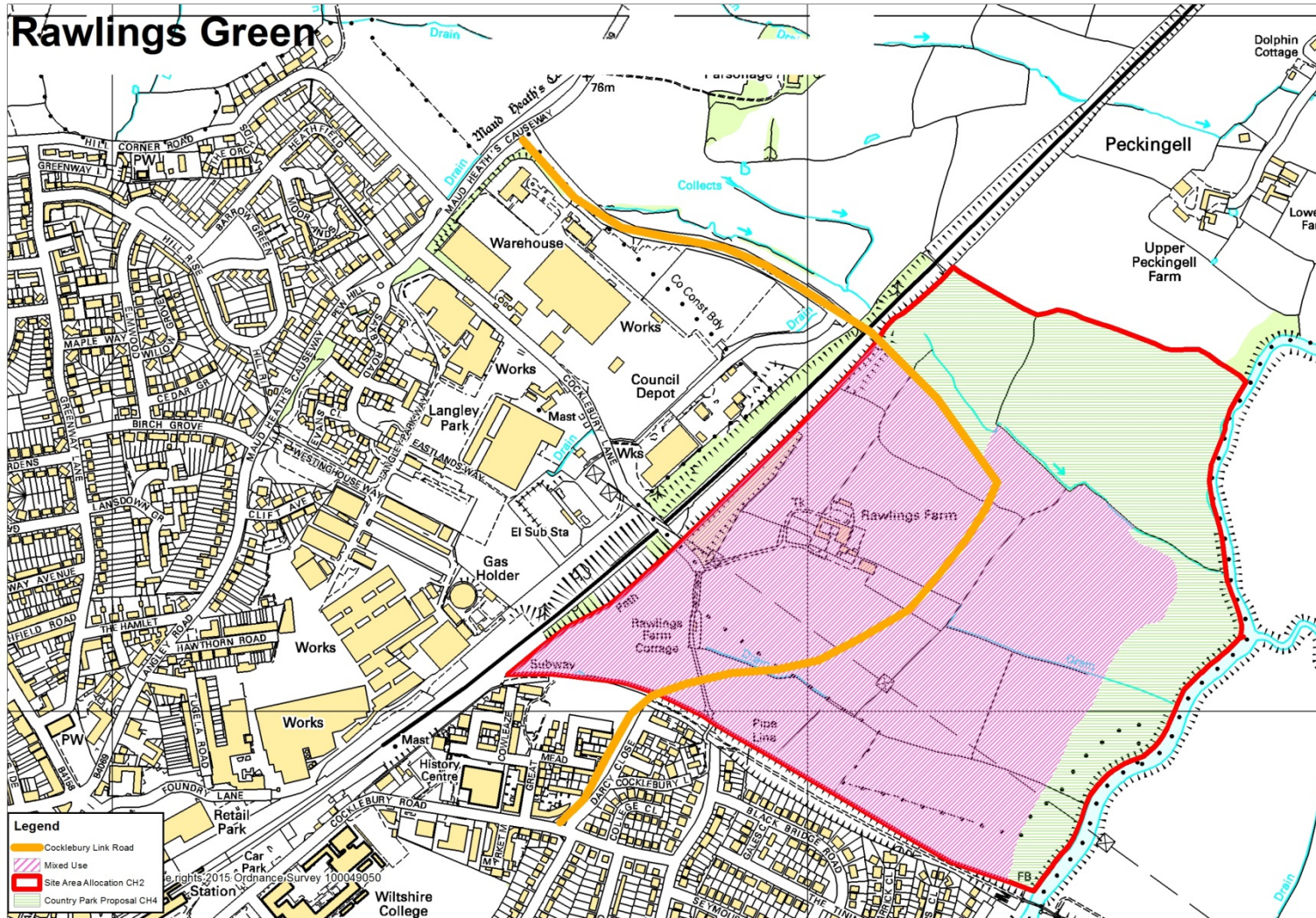




MM8 Replace Figure 5.1



MM19 Amend Figure 5.2 to include land in the Country Park area up to the 50 m contour and amend the mixed use area to include land within the proposed Cocklebury Link Road



MM32 Amend Table 6.1 Housing Delivery Trajectory as set out below

YEAR	Rawlings Green	SW Chippenham	Annual Total	Cumulative Total
2016/17				
2017/18		60	60	60
2018/19	<del>45</del> <u>20</u>	<del>175</del> <u>150</u>	<u>170</u>	<u>230</u>
2019/20	80	175	<u>255</u>	<u>485</u>
2020/21	80	175	<u>255</u>	<u>740</u>
2021/22	<del>80</del> <u>155</u>	<del>200</del> <u>175</u>	<u>330</u>	<u>1070</u>
2022/23	<del>85</del> <u>155</u>	200	<u>355</u>	<u>1425</u>
2023/24	<del>85</del> <u>160</u>	200	<u>360</u>	<u>1785</u>
2024/25	85	90	<u>90</u>	<u>1875</u>
2025/26	<del>80</del>	50	<u>50</u>	<u>1925</u>
2026/27	<del>30</del>	50	<u>50</u>	<u>1975</u>
2027/28		<del>25</del> <u>50</u>	<u>50</u>	<u>2025</u>
2028/29		<u>25</u>	<u>25</u>	<u>2050</u>
Total	650	1400		2050

MM37 Insert Table 6.3

Table 6.3: Chippenham Outline Risk Register

Outline Risk Register			
	Generic	Site Specific	Assessment
Unavailable	Land not made available by land owners or no clear undertaking to do so		All land included within SHLAA is considered available. All land owners have indicated a willingness to release land for development but no firm agreement between land owners to ensure comprehensive approach.
Unsuitable	Location cannot be developed, employment land requirements will not be met or significantly less developable land	No employment land is made available, is reduced in scale or is delayed	Current application for significant provision for employment land at Showell Farm. Form of employment provision at Rawlings Green has yet to be agreed and developer aspirations may not conform to plan objectives
		Development increases flood risks	Design of sustainable drainage measures advanced west of the river at SW Chippenham. Sustainable drainage measures appear at an early stage at Rawlings Green. No indication that effective measures are impossible to implement. Little risk that larger amounts of land may be required, reducing developable area.
		Development has an unacceptable	Significance of heritage assets and their setting have been assessed and mitigation considered possible. Development at SW Chippenham has less than substantial harm. Further

Outline Risk Register

	Generic	Site Specific	Assessment
		impact upon heritage assets	detailed work required at Rawlings Farm.
		Development has unacceptable visual impacts	Development at SW Chippenham within existing visual envelope of urban area. Low density at Rawlings Green appears to be accepted by developers.
Unachievable	Unrealistic prospect of significant development within 5 years	Access cannot be achieved to Darcy Close from Rawlings Green	Detailed design stage has been reached and there is agreement in principle between land owners.
		Access cannot be achieved to Parsonage Way and A350	Detailed design stage has been reached and there is agreement in principle between land owners.
Unviable	Insufficient incentive for land owner/developer	There are 'big ticket' infrastructure items and it has not been established that a development can fund this	Developer has submitted planning application for SW Chippenham. No developer yet firmly associated with taking forward detailed proposals at Rawlings Green.

Outline Risk Register

	Generic	Site Specific	Assessment
		and other policy requirements (such as affordable housing)	
		Inadequate level of affordable housing (less than 40%)	

# Appendix 2: Chippenham Site Allocations Plan

## Committee draft

## February 2017

May be subject to further minor textual  
changes in the interest of accuracy and  
consistency

# Chippenham Site Allocations Plan February 2017

Draft



Draft

1	Introduction	3
2	Context	7
3	Vision and objectives	15
4	Development strategy	21
5	Site allocations	29
6	Monitoring and Implementation	41
7	Glossary	47
8	Appendix 1	49
9	Appendix 2	53

Draft

Draft

# 1 Introduction

## Purpose of the Plan

- 1.1 The Wiltshire Core Strategy (WCS)<sup>(1)</sup> identifies Chippenham as a Principal Settlement. It also identifies the general scale of growth at Chippenham, **but does not identify specific sites to deliver the growth**. It is the purpose of this Site Allocations Plan to identify the strategic sites which will best support the town's future and which are the most environmentally appropriate in accordance with the overarching policies of the Wiltshire Core Strategy.
- 1.2 The purpose of this plan is to identify large mixed use sites for businesses, new homes and the infrastructure necessary to support them (strategic sites). In planning for the future growth of the town the proposals of this plan seek to:
- Provide opportunities for appropriate economic growth which supports both inward investment and the expansion and creation of local businesses
  - Manage development to ensure the timely delivery of supporting infrastructure to mitigate the impact of growth on local services and facilities
  - Promote mixed use development to provide the opportunity for people to choose to live and work locally
  - Protect, and where possible enhance, the natural, historic and built environment within and surrounding the town whilst recognising development on the periphery of the town is inevitable
  - Create new green infrastructure which improves access to and appreciation of the river corridor running through the town
  - Respect the individual identities of villages within the landscape setting of Chippenham and their relationship to the town

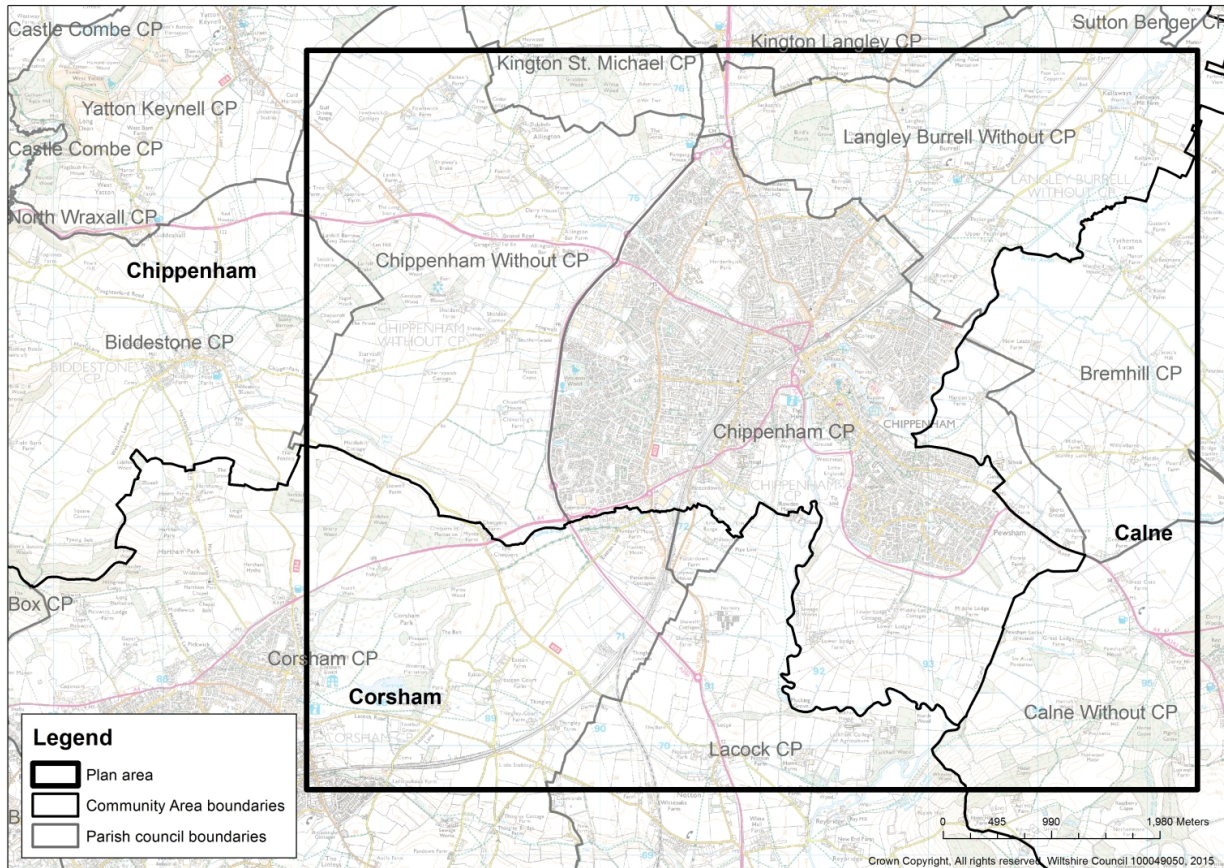
## Plan Area

- 1.3 The Plan area is identified in Figure 1.1. It includes the parish of Chippenham Town and parts of Bremhill, Calne Without, Chippenham Without, Kington St Michael, Lacock and Langley Burrell Parishes. The area has been defined by reference to the sites identified in the Strategic Housing Land Availability Assessment (SHLAA) 2012<sup>(2)</sup> which relate to Chippenham Town. The Plan area also recognises the visual relationship between Chippenham and surrounding smaller settlements. Evidence to support the plan has not been constrained by the plan area boundary but has been guided by evidence gathered in relation to specific topics, for example visual relationships are identified in Evidence Paper 4: Landscape Assessment.
- 1.4 The Plan area includes land outside the Chippenham Community Area within the Calne and Corsham Community Areas recognising that the purpose of the Plan is to identify the most appropriate sites for large scale mixed use development at Chippenham irrespective of administrative boundaries.

1 Wiltshire Core Strategy Development Plan Document, Adopted January 2015. For access to this document, please refer to the Chippenham Site Allocations Plan webpage.

2 Wiltshire Strategic Housing Land Availability Assessment as updated by the Call for Sites exercise for Chippenham, Spring 2014. For access to this document, please refer to the Chippenham Site Allocations Plan webpage.

Figure 1.1 Map of the Plan area



## How this Plan has been prepared

- 1.5** The WCS sets the scale of growth to be delivered at Chippenham for the period 2006-2026. Core Policy 10 of the WCS requires that approximately 26.5 ha of employment land and at least 4,510 new homes are delivered at the town by 2026 but does not identify specific sites to deliver the growth. The selection of sites for allocation to deliver this growth has been guided by the criteria included in Core Policy 10 and by the key issues identified in the Chippenham Area Strategy section of the WCS (expressed at paragraphs 5.44 to 5.54).
- 1.6** The criteria in Core Policy 10 formed the basis for the comparative assessment of strategic areas and sites. For each criteria, evidence was gathered to support decisions on the choice of strategic areas and sites. The evidence papers are available on the council's website and are:
- Evidence Paper 1: Economy
  - Evidence Paper 2: Housing and Community Facilities
  - Evidence Paper 3: Transport and Accessibility (Parts 1 and 2)
  - Evidence Paper 4: Landscape Assessment
  - Evidence Paper 5: Biodiversity
  - Evidence Paper 6: Flood Risk and Surface Water Management
  - Evidence Paper 7: Heritage Assets

- 1.7** The Chippenham Site Allocations Plan (CSA Plan) has been informed by discussions, submitted comments and events that were recorded as part of the WCS plan preparation over the period 2009-2014 and targeted consultation with stakeholders on the CSA Plan<sup>(3)</sup>.

## **Sustainability appraisal**

- 1.8** The Council appointed consultant Atkins to undertake the sustainability appraisal of the CSA Plan. Sustainability appraisal is integrated into the plan-making process, with outputs from the appraisal work used to inform decisions made on the CSA Plan. A draft Sustainability Report has been published alongside the draft CSA Plan.
- 1.9** Comments are invited on this version of the SA report during the consultation period in accordance with Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (see below).

## **Policies Map**

- 1.10** On adoption, the Wiltshire Policies Map will be amended to include the mixed use strategic sites allocated in this plan at Rawlings Green and South West Chippenham as indicated at Appendix 1. The current settlement framework for Chippenham on the Wiltshire Policies Map will also be amended to relate to the current built up area of the town as indicated at Appendix 2.

## **Consultation**

- 1.11** On 14 July 2015, following consideration by Cabinet on 9 July, Council approved the submission of the draft Chippenham Site Allocations Plan (the Plan), together with proposed changes, to the Secretary of State for Examination. The proposed changes had arisen as a result of consultation on the Pre-Submission draft Plan in February 2015.
- 1.12** The Plan was subsequently submitted on 30 July 2015. The appointed Inspector, Patrick Whitehead, wrote to the Council on 18 September setting out his Initial Appraisal of the Plan to which the Council responded. On 5 October, the Inspector confirmed that on the basis of the Council's response he was content for the examination to proceed to the hearing sessions. The hearings opened on 10 November and were programmed to run until 19 November 2015.
- 1.13** On day two, the Inspector suspended proceedings when the Inspector raised concerns about the evidence supporting the Plan. The Inspector set out his concerns in letters to the Council of 16 and 30 November 2015. In response the Council wrote to the Inspector on 4 December 2015 and provided a Schedule of Work designed to address his concerns.
- 1.14** The outcome of this Schedule of Work was reported to Cabinet on 19 April 2016 and subsequently to Council on 10 May 2016 where approval was given to consult on Proposed Modifications to the Plan and the revised evidence base that was the outcome of the Schedule of Work. The Proposed Modifications were consulted on over the period 23 May – 5 July 2016.
- 1.15** All comments received as part of this consultation were forwarded to the Inspector for his consideration. Following receipt of this information hearings were reopened between 27 September and 4 October 2016. As a consequence of these hearing sessions further

---

<sup>3</sup> For further information on the consultation that has informed the plan see Chippenham Site Allocations Plan Consultation Statement, February 2015

changes were proposed to the draft Plan which were consulted on over the period 31 October to 12 December 2016. The response to this consultation was also sent to the Inspector for his consideration.

**1.16** The Inspector issued his Report to the Council on 21 February 2017.

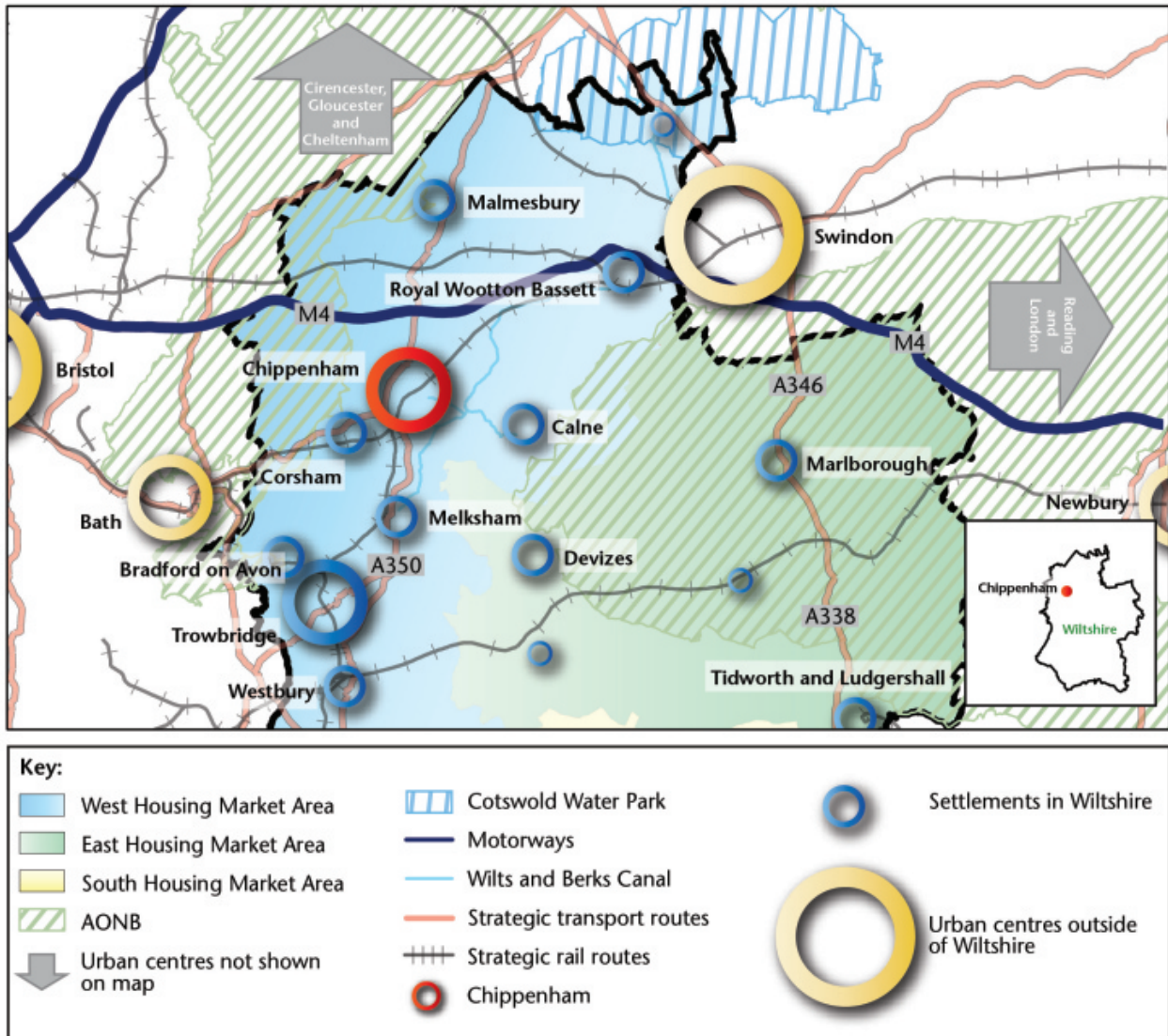
Draft

## 2 Context

- 2.1** The Chippenham Site Allocations Plan has a very specific remit - to identify large mixed use sites at Chippenham consistent with its status as a Principal Settlement in the Wiltshire Core Strategy and to provide homes and jobs for the town's growing population. To understand how the plan's proposals will affect the town there needs to be an appreciation of its geography.
- 2.2** Natural and man-made boundaries define the edge of Chippenham. To the west and north the A350 generally defines the edge of the town. To the east and south it is predominantly defined by the floodplain and farmland. The River Avon flows southwards through the town. Chippenham is one of the largest centres in Wiltshire, with a population of around 36,000. It has excellent transport links, being in close proximity to the M4, the A350 and is located on the main Bristol to London railway route (Great Western Railway). This locational strength is a distinct reason for the town's important economic position. It is a focus for growth capitalising on the towns access to the M4 corridor, London and wider markets. There is strong demand for suitable land for employment growth in Chippenham, but a serious shortage of supply exists. One of the Plan's main aims is therefore to remedy this shortage.
- 2.3** The town centre is subject to pressures from peripheral retail areas that compete with the town centre for trade. Although there is a relatively strong retail offer in the town, people often choose to shop in other nearby larger settlements, including Bath and Swindon. Recent evidence shows that the need for new retail floorspace has declined in common with most other areas as a result of factors like the recession and the impact of the growth of internet trade. An aim of the Plan is therefore also to safeguard prospects for the town centre and complement initiatives for its regeneration.
- 2.4** The town experiences out commuting for jobs notably to both Bath and Swindon but also further afield to Bristol and London. Constraints and other features of importance are identified on Inset Map 4: Chippenham of the Wiltshire Policies Map. Figure 2.1 illustrates Chippenham's general location in relation to Wiltshire and the M4.



Figure 2.1 Chippenham Location Map



- 2.5** The town's green infrastructure network, particularly along the River Avon, is a key feature of the town that still connects and draws residents towards the river and town centre. Developing possibilities to make more of the river around Chippenham is a longstanding local ambition.
- 2.6** As a historic market town Chippenham has grown in the past and responded to change brought about by the railway and new road connections. The historical development of the town is described in the Chippenham Central Area Masterplan<sup>(4)</sup>.
- 2.7** The centre of Chippenham has a designated conservation area. The Chippenham Conservation Area Management Plan (Adopted April 2010 as Supplementary Planning Guidance) provides development guidelines, which include protecting the settings of these and other key assets within the town. The churches of St Andrew and St Paul have tall steeples and are prominent in views of the town. This prominence reflects a deliberate design intention, and the setting of these assets therefore includes the wider landscape in which they are experienced. There are a number of significant assets within the town including:

4 Chippenham Central Area Masterplan <http://www.thechippenhamvision.co.uk/documents.aspx>

- Grade I listed The Ivy, The Yelde Hall and Sheldon Manor
- Grade II\* St Andrew's Church, Hardenhuish House, St Paul's Church and St Nicholas's Church

## National policy context

### National Planning Policy Framework

- 2.8** The National Planning Policy Framework<sup>(5)</sup> (NPPF) sets out the government's planning policies for England. The NPPF must be taken into account in the preparation of local and neighbourhood plans, and is a material consideration in planning decisions. One of its core principles is that development should be genuinely plan-led, empowering local people to shape their surroundings, with succinct local and neighbourhood plans setting out a positive vision for the future of the area. This Plan is being prepared in accordance with that principle.
- 2.9** At the heart of the NPPF is a presumption in favour of sustainable development, which should be seen as a 'golden thread' running through plan-making and decision-taking. For plan-making, this means that local planning authorities should positively seek opportunities to meet the development needs of their area. The NPPF asks that Councils boost significantly housing supply. In recent times, house building in Chippenham has been at its lowest for thirty years. The Plan allocates land to address this situation.

## Local context

### Wiltshire Core Strategy

- 2.10** The Wiltshire Core Strategy<sup>(6)</sup> was adopted by Wiltshire Council on 20 January 2015. The Core Strategy covers the whole of Wiltshire (excluding Swindon) and sets out the council's spatial vision, key objectives and overall principles for development in the county to the year 2026. The Core Strategy has been produced to be consistent with national policy and the Wiltshire Community Plan.
- 2.11** The Core Strategy identifies six key challenges for Wiltshire<sup>(7)</sup>:
- Economic growth to reduce levels of out commuting from many of Wiltshire's settlements
  - Climate change opportunities to reduce greenhouse gas emissions and mitigate the consequences of a changing climate
  - Providing new homes to complement economic growth and a growing population
  - Planning for a more resilient community
  - Safeguarding the environmental quality of the County whilst accommodating new growth, and
  - Infrastructure investment to meet the needs of the growing population and economy.
- 2.12** The Chippenham Site Allocations Plan is concerned with determining where the levels of growth identified in the Wiltshire Core Strategy are to be delivered at Chippenham and faces these same key challenges.
- 2.13** The Chippenham Area Strategy section of the Core Strategy sets out the main specific issues that should be addressed in planning for the Chippenham Community Area, including objectives to prioritise new employment provision to help redress existing levels of net out-commuting, manage the delivery of housing development throughout the plan period to

5 National Planning Policy Framework, Department for Communities and Local Government, March 2012

6 Wiltshire Core Strategy Development Plan Document, January 2015. For access to this document, please refer to the Chippenham Site Allocations Plan webpage.

7 Wiltshire Core Strategy, January 2015, paragraph 2.6-2.18

ensure a steady supply of new homes, and to enhance Chippenham's offer as a service centre. Key issues and considerations include recognising the River Avon as an important asset, recognising the ecological value of Birds Marsh Wood and the need for improvements in public transport connectivity and pedestrian and cycle links to key locations in the town.

### The strategy for the Chippenham area

The strategy for Chippenham is based on delivering significant job growth, which will help to improve the self-containment of the town by providing more jobs for local people. To ensure employment is accessible to the local population a sustainable distribution and choice of employment sites will be provided at the town. They will form part of mixed use urban extensions, incorporating housing, that are well integrated with the town. Currently, the limited opportunities for the redevelopment of brownfield sites in Chippenham means that it is necessary to identify greenfield sites on the edge of town. The strategy will respond to the Community Area's location (in full or part) within a nationally designated landscape. In the Chippenham Community Area this includes the Cotswolds Area of Outstanding Natural Beauty. It will deliver, within the overall objective of conserving the designated landscape, a modest and sustainable level of development.

Strategically important mixed use sites for the town's expansion will be further identified in the Chippenham Site Allocations Development Plan Document

(Wiltshire Core Strategy, adopted January 2015, paragraph 5.46 and 5.47)

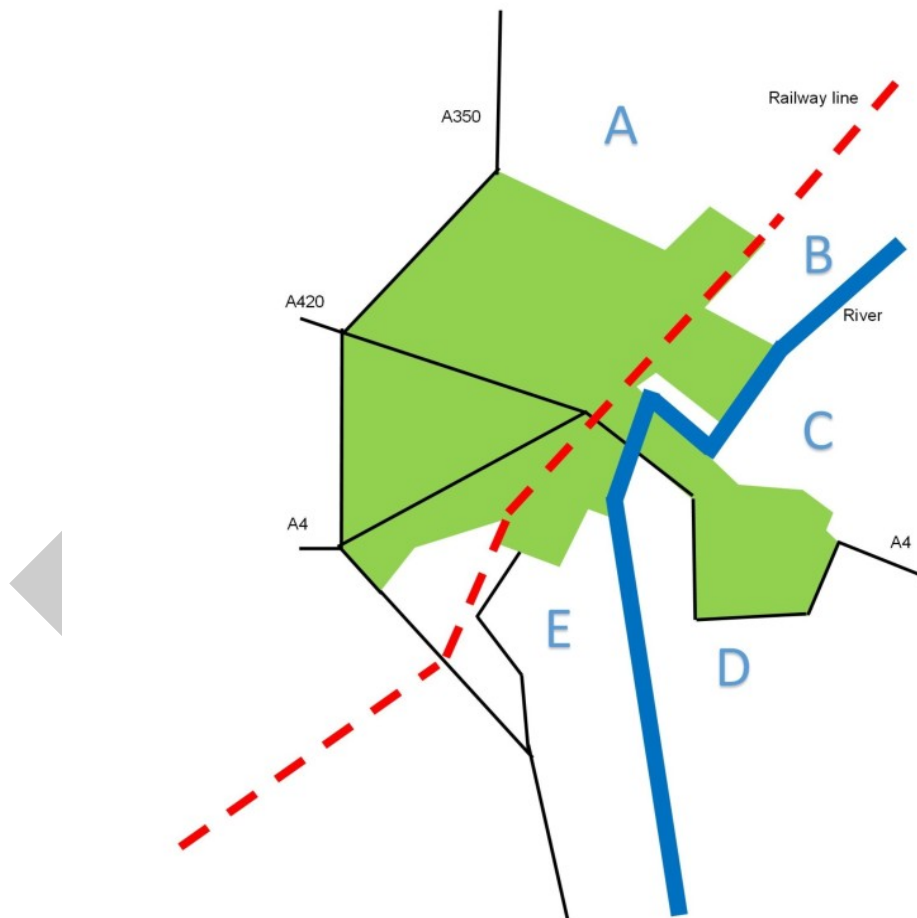
- 2.14** The Wiltshire Core Strategy identifies the overall level of housing and employment growth at the town but does not allocate strategic sites for development. Core Policy 10 establishes a need to identify at least a further 2,625 dwellings (once existing completions and commitments have been taken into account<sup>(8)</sup>) and approximately 26.5ha of land for employment development on land adjoining the built up area.
- 2.15** The role of this Chippenham Site Allocations Plan is to plan positively for the most appropriate and sustainable large mixed use land opportunities necessary to deliver at least this scale of growth. In this context there are a number of strategic areas where large mixed use sites could be located and these broad 'strategic areas' are identified in the Wiltshire Core Strategy, as illustrated in figure 2.2.
- 2.16** These broad 'strategic areas' for growth are indicated by barriers such as main roads, rivers and the main railway line. The A350 is one such barrier to development, but is also considered to be a clear and logical boundary to the town, which should not be breached<sup>(9)</sup>. Hence no strategic areas, for the purpose of the CSAP Plan, are shown west of the A350.

8 Housing Land Supply Statement, April 2014 (published July 2014)

9 Briefing Paper 2: Definition of Strategic Areas (updated January 2015) provides a more detailed explanation of how the strategic areas were defined. For access to this document, please refer to the Chippenham Site Allocations Plan webpage.

Figure 2.2 Chippenham Strategic Areas, Wiltshire Core Strategy

## Chippenham Strategic Areas



### Swindon and Wiltshire Local Economic Partnership

- 2.17** The Swindon and Wiltshire Local Economic Partnership (LEP) are seeking to capitalise on Wiltshire's pivotal location for growth<sup>(10)</sup>. The location of Chippenham is recognised as presenting an opportunity for economic growth given its proximity to the M4 and location on the Great Western Railway. The Swindon and Wiltshire Strategic Economic Plan (SEP)<sup>(11)</sup> prioritises investment in improvements to the A350 Corridor and includes support for growth in and around Chippenham.
- 2.18** In December 2014, the Swindon and Wiltshire LEP secured a £129 million 'Growth Deal' from the Government's Local Growth Fund to support economic growth in the area<sup>(12)</sup>. Swindon and Wiltshire LEP and Central Government have agreed to co-invest in nine identified jointly-agreed priorities including provisionally allocating funds to two projects that will directly affect Chippenham:

10 Swindon and Wiltshire Local Enterprise Partnership Proposal 2011

11 Swindon and Wiltshire Strategic Economic Plan: Aligning Local Innovation with Government Ambition March 2014 Swindon and Wiltshire Local Enterprise Partnership <http://www.swlep.biz/docs/1>

12 Swindon and Wiltshire Strategic Economic Plan: Swindon and Wiltshire Secure £129 million Growth Deal, 19 December 2014 <http://www.swlep.biz/news/206>

- Chippenham station hub - Redevelopment of Chippenham station including enhanced parking and retail offer and new railway crossing
- A350 Dualling Chippenham Bypass - Dualling the A350 north of Chippenham from Badger Roundabout to Chequers Junction.

### **Wiltshire and Swindon Local Nature Partnership (Link2Nature)**

**2.19** The Wiltshire and Swindon Local Nature Partnership (Link2Nature) involves a wide range of organisations linked to the natural environment. It works across a range for different sectors to recognise and promote the value of the natural environment. In preparing the plan, the Council has had regard to the main environmental priorities for Wiltshire, as identified in Link2Nature's Strategic Plan including biodiversity loss, water resource management, impacts from population growth, climate change, engaging public health through access to nature, sustainable economic growth and development, and engaging local people with their environment.

### **Wiltshire Community Plan**

**2.20** The Wiltshire Community Plan 2011-2026: People, Places and Promises<sup>(13)</sup> has three overarching priorities:

- Creating an economy that is fit for the future
- Reducing disadvantage and inequalities
- Tackling the causes and effects of climate change.

**2.21** Covering the same time period as the Wiltshire Core Strategy and the Chippenham Site Allocations Plan to 2026, it recognises the role of development in helping to deliver the promises of the community plan and to help define the sort of place Chippenham can be. It also recognises the opportunities in Chippenham to enhance sustainable transport modes and encourage more cycling and walking. Such opportunities to help deliver the promises of the Community Plan should be acknowledged in proposals of the plan.

### **Chippenham Vision**

**2.22** The Chippenham Vision is an initiative to help make Chippenham a great place to live, work and visit. It is a partnership of local authorities, organisations and groups; a framework for managing and delivering change/ regeneration/ benefits and a description of the future for Chippenham. Many elements of the Partnerships vision for Chippenham are relevant to the development of the CSA Plan.

**2.23** A specific role of the Chippenham Vision was to develop a masterplan for the centre of Chippenham. Core Policy 9 of the Wiltshire Core Strategy (Chippenham Central Areas of Opportunity) identifies redevelopment opportunities in Chippenham town centre and the adjacent Langley Park area. Supported by Wiltshire Council, the Chippenham Vision partnership published and consulted on a draft Chippenham Central Area Masterplan to provide further detail and guidance on development to be brought forward in accordance with Core Policy 9. The Masterplan<sup>(14)</sup> is due to be adopted by the council as a supplementary planning document (SPD) during 2015 to support the implementation of Core Policy 9 of the Wiltshire Core Strategy. It was originally envisaged that elements of this masterplan may need to be reflected in specific policies in the CSA Plan. However, the masterplan can be

13 Wiltshire Community Plan 2011-2026: People, Places and Promises. For access to this document, please refer to the Chippenham Site Allocations Plan webpage.

14 Chippenham Central Area Masterplan <http://www.thechippenhamvision.co.uk/documents.aspx>

supported and delivered through Core Policy 9 of the WCS alone. Instead the proposals of the CSA Plan seek to deliver some of the wider aspirations of the Chippenham Vision, for example greater access to the river corridor and investment in employment opportunities.

## Relationship with Neighbourhood Planning

**2.24** Parish and Town Councils have the opportunity to prepare neighbourhood plans for their areas, which once 'made' (i.e. adopted by the local authority after a successful independent examination and community referendum) form part of the development plan. Neighbourhood plans can develop policies and proposals to address local place-based issues but are required to be in general conformity with higher level plans (including the Wiltshire Core Strategy). Neighbourhood plans may deal with non-strategic planning issues in accordance with the approach described in NPPF paragraph 185 and cannot be used to undermine the strategic policies for the local area. In January 2015 the parishes of Bremhill, Chippenham Without and Langley Burrell are actively preparing a neighbourhood plan.

## Cross-boundary matters

**2.25** The Plan is prepared under a legal 'duty to cooperate' requirement through the Localism Act 2011 which requires local authorities to work with neighbouring authorities and other prescribed bodies when preparing a development plan document. It places a legal duty on local planning authorities in England and public bodies to engage constructively, actively and on an ongoing basis to maximise the effectiveness of local plan preparation in the context of strategic matters. When preparing plans local authorities should also have regard to Local Enterprise Partnerships and Local Nature Partnerships in their area.

**2.26** The Council engaged with neighbouring authorities and statutory consultees throughout the preparation of the WCS, which sets the framework for this Chippenham Site Allocations Plan. This engagement is documented in evidence to the WCS<sup>(15)</sup>. The strategy for Chippenham within the WCS is based on delivering significant job growth, which will help to improve the self containment of the town by providing more jobs for local people and helping to redress the existing levels of out-commuting to settlements such as Bath, Bristol and Swindon.

**2.27** How the outcomes from the duty to cooperate has informed the preparation of the Chippenham Site Allocations Plan is set out in a separate report<sup>(16)</sup>.

---

15 Statement on Duty to Cooperate, July 2012 and Factual addendum on Wiltshire Council's Statement on Duty to Cooperate. May 2013. There were also a series of Statements of Common Ground with each of the prescribed bodies as part of preparing for the examination of the WCS

16 Chippenham Site Allocations Plan: draft Statement on Duty to Cooperate, July 2015

Draft

## 3 Vision and objectives

### A Vision for Chippenham

- 3.1** Wiltshire Council, as part of the Chippenham Vision, have worked together since 2010 to develop a strong, positive future for Chippenham<sup>(17)</sup>. The collaboration informed both the Wiltshire Core Strategy content for Chippenham and the Chippenham Central Area Master Plan.
- 3.2** The strategy for Chippenham, as explained in the Wiltshire Core Strategy<sup>(18)</sup>, is based on delivering significant job growth, which will help to improve the self-containment of the town by providing more jobs for local people. To ensure employment is accessible to the local population a suitable distribution and choice of employment sites should be provided at the town. Employment sites should form part of mixed use urban extensions, incorporating housing, that are well integrated with the town. As identified in the Core Strategy, currently, the limited opportunities for the redevelopment of brownfield sites in Chippenham means that it is necessary to identify greenfield sites on the edge of town. The Core Strategy establishes that the strategy for growth at Chippenham should focus on mixed use strategic sites (paragraph 5.55). The WCS also recognises the need to improve public transport connectivity and pedestrian and cycle links; protect landscape character and biodiversity and recognises the role of the River Avon as an important asset running through the town.
- 3.3** All these issues are reflected in the Vision for Chippenham included in the draft Chippenham Central Area Masterplan<sup>(19)</sup>. For this reason it is proposed that the same vision is adopted for the Chippenham Site Allocation Plan to demonstrate support for a joint vision for the town.

---

17 Chippenham Visioning: ATLAS Report on the visioning event held on 23 September 2010 brings together previous work and summarises a workshop event to help develop a long term vision for the town. For access to this document, please refer to the Chippenham Site Allocations Plan webpage.

18 Wiltshire Core Strategy, January 2015, paragraphs 5.46 and 5.47 supported by the issues and consideration set out at paragraph 5.48

19 Chippenham Central Area Masterplan Page 18 <http://www.thechippenhamvision.co.uk/documents.aspx>.



## Chippenham Vision

- Chippenham will strive to be as attractive as possible in terms of shopping and leisure provision and will emphasise its role as a Riverside Market town surrounded by beautiful countryside and attractive villages.
- Chippenham will recognise and build on its natural assets and its important heritage will be cherished. Its setting on the River Avon will be its defining and connecting feature combined with the historic centre, the market, pleasant parks and open spaces; creating a thriving artery and distinctive identity for the town.
- Chippenham will be a place where young people choose to stay to live and work, because of the excellent education facilities, the choice and quality of work, which are complimented by its programme of events, festivals and activities.
- Chippenham will be a retail destination of choice for the surrounding area due to its range of shops, excellent market, lively cafés and restaurants and leisure facilities which are complimented by its programme of events, festivals and activities.
- Chippenham will take advantage of its excellent rail and road links and its position on the high tech corridor between London, Bristol and beyond. It will strengthen its offer and role as a business location ensuring people can live and work locally.
- Chippenham will have an integrated approach to transport so that traffic flow will be more efficient, the town centre will be less congested and there will be improved access for sustainable modes of transport.

## Objectives

- 3.4** Criteria in Core Policy 10 effectively set out a series of objectives to guide the provision of growth at the town. Through the objectives set out below, the CSA Plan seeks to deliver the changes anticipated in the WCS at paragraphs 5.49-5.52 within the Chippenham Area Strategy and help deliver the broader vision for Chippenham set out above.

### Objective 1: delivering economic growth

- 3.5** As the Core Strategy acknowledges, new employment provision in Chippenham is a priority and will help to redress the existing levels of net out-commuting. Land for new employment generating uses is allocated as an important element on each strategic site. Evidence Paper 1: Economy<sup>(20)</sup> recognises that there needs to be a range and choice of employment sites to provide the best possible prospects for employers to invest locally. Chippenham is a good location on both the M4/Great Western main line corridor and the A350 corridor. At the moment evidence shows there is a lack of available employment land and premises. Rectifying this position must be a priority if the vision is to provide a choice of quality work for young people and to reduce net out commuting. Part of the role of the Site Allocations Plan is to build upon the successful employment locations in Chippenham already protected for employment uses through Wiltshire Core Strategy Core Policy 35; deliver the opportunities for employment uses identified through the Chippenham Central Area masterplan and to identify new employment land to ensure that Chippenham can meet the needs of employers

20 Evidence Paper 1 Economy Interim Paper December 2014. For access to this document, please refer to the Chippenham Site Allocations Plan webpage.

who require new premises for expansion but cannot find available land to achieve this. In particular, there is a shortage of employment land for B2 Industrial and B1 Light Industrial uses in Chippenham. Employment development should be promoted in advance of housing. Safeguarding the vitality of the town centre from competing peripheral retail development development should also be part of this objective.

## **Objective 2: providing housing supported by appropriate infrastructure**

**3.6** The provision of new housing in Chippenham has dwindled in the recent past partly due to the recession and the lack of available land as previous plan allocations have been built<sup>(21)</sup>. For this Plan there will be a mix of house types and locations (open market and affordable) delivered alongside supporting services and facilities. It is important that housing delivery is managed throughout the plan period to ensure that it takes place in step with the provision of new infrastructure. As well as facilities forming a part of development, transport improvements will be required to accommodate the impact of growth, including measures for cycling, walking and public transport access to the town centre and employment areas. The Core Strategy already identifies a number of improvements needed in Chippenham which need to be provided alongside development including enhanced health and emergency services. This is also recognised in the Infrastructure Delivery Plan (September 2013) which identifies extended GP services as prioritised essential infrastructure. The NHS and GPs in Chippenham are working towards a detailed proposal for delivering these enhancements. Sustainable construction and low-carbon energy will be integral to the development of all strategic sites.

**3.7** Evidence Paper 2 includes a specific statement on education<sup>(22)</sup>. In relation to secondary schools there is some capacity over the early years of the plan period at all three secondary schools (Hardenhuish, Sheldon, Abbeyfield), with the most capacity at Abbeyfield School. However, this capacity will not accommodate all the planned growth anticipated in the plan period so it is essential that the plan identifies opportunities to respond to future need. In relation to primary education there is a desire to rationalise primary school provision to include more two form entry schools as this size has advantages in revenue funding, sustainability and in teaching and learning. The revenue funding advantages include being able to achieve significant economies of scale, being more able to employ specialist staff and having a larger base budget that is more able to cope with fluctuations in income that result from changing pupil numbers. The proposals of the plan therefore focus on provision for two form entry primary schools as a part of the development of strategic sites.

## **Objective 3: improving connectivity and reducing traffic impacts**

**3.8** The scale and rate of growth that Chippenham will accommodate over the plan period will increase pressures on the road network. The A350 plays an important role both in supporting the town's economy but also a much wider area. Improvements are planned to improve how the A350 works and development at Chippenham must not undo these benefits. Congested road corridors and junctions within the town impede and can deter travel to the town's businesses, services and facilities. In particular, congestion in and around the town centre, as recognised by the Chippenham Vision, needs to be addressed as a part of planning for the town's growth. This also goes for management measures to prevent negative impacts on junction 17 of the M4 motorway. Joint working with Highways England helps to identify the cumulative impacts of growth on the strategic road network and will inform measures to

21 Housing Land Supply Statement 2014 Table 1, Page 7, Wiltshire Council July 2014. For access to this document, please refer to the Chippenham Site Allocations Plan webpage.

22 Evidence Paper 2: Housing and Community Facilities, July 2015. For access to this document, please refer to the Chippenham Site Allocations Plan webpage.

improve junction 17. The location and development of strategic sites must at least prevent unacceptable traffic impacts, but it may also benefit how the local network functions by involving the provision of new road infrastructure.

#### **Objective 4: improving access to sustainable transport**

**3.9** The need to improve access to sustainable transport is recognised in the Wiltshire Community Plan and in the Chippenham Vision. Public transport connectivity and pedestrian and cycling links to the town, town centre, railway station and Wiltshire College campus also needs to be improved including better integration of different modes. Evidence Paper 3: Transport and Accessibility<sup>(23)</sup> seeks to provide a balance of judgement against these wide ranging and often opposing issues and concerns (for example improved access to the primary road network to enable traffic to leave Chippenham without exacerbating existing areas of congestion whilst promoting alternatives to the private car). Development should seek to promote easier access to key services by non motorised transport, improve access to public transport, offer efficient access to the primary road network, particularly by HGV traffic, and avoid unnecessary traffic in the town centre. Seizing the opportunity to improve sustainable transport connectivity to the town centre though improving access to the River Avon corridor whilst respecting its character and value is a clear challenge for the Plan.

#### **Objective 5: minimising landscape impact and protecting the natural, historic and built environment**

**3.10** The value of the River Avon through the town and the sensitivity of the landscape setting around Chippenham, particularly the town's relationship with surrounding villages, is repeatedly raised in consultations about Chippenham<sup>(24)</sup>. The River Avon is an important asset for the town and the local environment, and should be better integrated with the town centre and urban extensions as part of a green infrastructure strategy, as a green corridor for wildlife, as a recreational space and as a sustainable transport route for pedestrians and cyclists. The Chippenham Vision recognises how this can become a defining and connecting feature within the town. There are also specific concerns about protecting the ecological value of the Birds Marsh Wood County Wildlife Site and Village Green and Birds Marsh Meadow County Wildlife Site. Evidence Paper 4: Landscape Assessment<sup>(25)</sup> and Evidence Paper 5: Biodiversity<sup>(26)</sup> recognises all these issues; issues which should also be recognised and protected.

**3.11** The allocation and development of strategic sites will inevitably bring about fundamental change from rural to urban around the town. The landscape surrounding Chippenham provides the setting to the settlement, defining its edges and also providing characteristic glimpses from the town out to the countryside. Evidence Paper 4: Landscape Assessment<sup>(27)</sup> also raised specific concerns about protecting the setting and historic value of the conservation

---

23 Evidence Paper 3: Transport and Accessibility Part 1, December 2014 and Part 2, January 2015. For access to this document, please refer to the Chippenham Site Allocations Plan webpage.

24 Wiltshire 2026 Consultation Methodology and Output Report August 2010. For access to this document, please refer to the Chippenham Site Allocations Plan webpage. Wiltshire 2026 Consultation Methodology and Output Report Appendices August 2010. For access to this document, please refer to the Chippenham Site Allocations Plan webpage. Chippenham Feedback Hullavington Village Hall July 2010. For access to this document, please refer to the Chippenham Site Allocations Plan webpage. Chippenham Workshop Report March 2011 Wiltshire Core Strategy Consultation Document Consultation Statement January 2012 Regulation 22(i)(c) Statement - Consultation Methodology and Output Report June 2012. For access to this document, please refer to the Chippenham Site Allocations Plan webpage.

25 Landscape Assessment Evidence Paper July 2015. For access to this document, please refer to the Chippenham Site Allocations Plan webpage.

26 Biodiversity Evidence Paper July 2015. For access to this document, please refer to the Chippenham Site Allocations Plan webpage.

27 Landscape Assessment Evidence Paper July 2015. For access to this document, please refer to the Chippenham Site Allocations Plan webpage.

areas and heritage assets within each Strategic Area. Development should seek to respect the important landscape features that make up this character and look to capitalise on opportunities to protect and enhance local heritage assets as well as biodiversity.

### **Objective 6: managing flood risk**

- 3.12** All areas at risk of flooding should be avoided. Evidence Paper 6: Flood Risk and Surface Water Management<sup>(28)</sup> identified parts of Chippenham as flood risk areas although much of the most vulnerable areas are protected by flood defences and river management. Some parts of the Plan area are considered susceptible to groundwater flooding and increased discharges to aquifers through infiltration using Sustainable Urban Drainage Systems (SUDS) may lead to future groundwater flooding issues. There are two levels of assessment (Strategic Flood Risk Assessment (SFRA)), Levels One and Two, the second of which is more detailed than the first. Both potentially have a part to play in planning future development. Generally, SFRA Level 1 establishes flood risk zones so that all new development can be guided to zone 1: the areas of least risk. An SFRA level 1 study involving Chippenham was carried out in 2007 and has been updated regularly since to take account of new legislative requirements and new information. The Environment Agency (EA) has recently confirmed that this remains a sound basis upon which to base site selection and to apply a sequential approach.

---

28 Flood Risk and Surface Water Management Evidence Paper July 2015. For access to this document, please refer to the Chippenham Site Allocations Plan webpage.

Draft

## 4 Development strategy

- 4.1** The approach to development at Chippenham is in the Wiltshire Core Strategy. At least 4,510 homes are to be delivered at Chippenham Town alongside approximately 26.5 ha of employment land by 2026<sup>(29)</sup>. Furthermore the strategic areas that may be assessed to deliver that growth have also been identified in the adopted Core Strategy together with a set of criteria to guide the choice of sites.
- 4.2** The approach adopted by the council in preparing this plan, therefore, was to establish a methodology for how the strategic areas identified in Figure 2.2 should be compared.

### Updating the housing requirement

- 4.3** The data included in the Wiltshire Core Strategy identified that land for a further 2,625 new homes would be required at Chippenham to meet the at least 4,510 homes to be built by 2026<sup>(30)</sup>. However, figures for housing supply are constantly changing. Figures also take account of brownfield sites identified in Core Policy 9 of the Wiltshire Core Strategy and the Chippenham Central Area Master Plan such as redevelopment proposals at Langley Park. The latest housing land supply assessment<sup>(31)</sup> therefore indicates that the residual requirement at Chippenham is now at least 1,780 homes.
- 4.4** Housing and Employment commitments form part of the present development strategy for Chippenham and should be delivered within the plan period in order to ensure at least the rate of growth proposed in the Core Strategy. Failure to deliver these commitments will result in an additional need for new sites. Housing delivery is monitored on an annual basis and will inform decisions on future planing applications. The commitments includes a further significant site at North Chippenham in addition to Hunters Moon. These are discussed further below.

### North Chippenham

- 4.5** This site for 750 homes and 2.7 hectares of employment land (12/00560/OUT) will deliver:
- A link road between Malmesbury Road (A350) and Maud Heath Causeway
  - Provision for the long term protection and management of Birds Marsh Wood
  - Public open space, leisure provision, highway improvements and education.

### Hunters Moon

- 4.6** This site for 450 homes and 2.3 hectares of employment land (13/01747/FUL) has also been approved subject to the signing of a section 106 agreement. This site will deliver:
- Off-site highways works including to Pheasant roundabout
  - Provision of new bus to allow dedicated service to run through the site
  - New Hill Top Park of 4.5 hectares
  - Public open space, leisure provision, highway improvements and education.

29 For further information see Briefing Note 5 - The Role of Strategic Sites, December 2014. For access to this document, please refer to the Chippenham Site Allocations Plan webpage.

30 For further information see Briefing Note 3 - The Housing Requirement for Chippenham. For access to this document, please refer to the Chippenham Site Allocations Plan webpage.

31 Housing Land Supply Statement, April 2016, published December 2016.

Table 4.1 Chippenham Housing Land Supply at April 2016

<b>Core Strategy Requirement</b>	<b>Completions 2006-2016</b>	<b>Commitments April 2016</b>	<b>Residual Requirement</b>
4510	1135	1715	1661

Source: Wiltshire Housing Land Supply Statement April 2016 (January 2017).

\* Figures rounded to the nearest 5

## Updating the employment requirement

**4.7** There is a requirement to provide approximately 26.5 hectares of employment land at Chippenham alongside housing as part of large mixed use sites. The current position is set out below. The commitments relate to the employment elements of the North Chippenham and Hunters Moon sites discussed above. The proposals are in outline. The final land developed for employment on each of these commitments will be determined through the development of masterplans and future detailed planning applications.

Table 4.2 Chippenham Employment Land Supply at April 2016

<b>Core strategy employment land requirement</b>	<b>Completions 2006-2016</b>	<b>Employment commitments April 2016</b>	<b>Residual requirement</b>
26.5 ha	0 ha	5.0 ha	21.5 ha

## Establishing an evidence base

**4.8** A significant amount of evidence had already been gathered about Chippenham to support the strategy in the Wiltshire Core Strategy. This has been reviewed and updated where necessary to support this plan. The site selection process<sup>(32)</sup> has used the following information:

- Evidence Paper 1: Economy
- Evidence Paper 2: Housing and Communities Facilities
- Evidence Paper 3: Transport and Accessibility Parts 1 and 2
- Evidence Paper 4: Landscape Assessment
- Evidence Paper 5: Biodiversity
- Evidence Paper 6: Flood Risk and Surface Water Management
- Evidence Base 7: Heritage Assets
- Sustainability Appraisal Report Volumes 1 and 2

**4.9** The methodology section below explains how the evidence relates to the Strategic Site Assessment Framework used to identify proposals at the town.

32 The process and outcomes are explained in full in the Chippenham Site Allocations Plan: Site Selection Report, May 2016

## Methodology

- 4.10** The Wiltshire Core Strategy sets a minimum amount of additional housing and employment for Chippenham between 2006 and 2026. It also establishes a set of six criteria to guide Chippenham's expansion (the Core Policy 10 criteria). These form the central basis for selecting 'strategic sites'. A strategic site assessment framework was developed to define how the Core Policy 10 criteria are interpreted and was informed by comments from the community and other stakeholders<sup>(33)</sup>.
- 4.11** The WCS identifies, diagrammatically, a set of indicative strategic areas located east of the A350 as potential areas of future expansion for strategic mixed use sites. The 'strategic areas' are defined by barriers such as main roads, rivers and the main railway line. Land west of the A350 is not considered a reasonable alternative for the allocation of strategic sites. The Council's reasoning is set out in Briefing Paper 2, which explains the definition of strategic areas<sup>(34)</sup>.
- 4.12** The strategic areas and options for strategic sites have been assessed using sustainability appraisal. Sustainability appraisal performs a similar task to the strategic site assessment framework and reports on likely environmental, social and economic effects of the options in order to inform decision making. This work has been carried out independently to the council<sup>(35)</sup>.
- 4.13** Each of the strategic areas has been assessed to see how they perform against the criteria contained in the core strategy as well as the sustainability appraisal. A result of that process was to suggest different patterns for the town's growth involving different strategic areas. These are termed 'development concepts'.
- 4.14** Based on information in the Council's Strategic Housing Land Availability Assessment more than twenty potential strategic site options were examined. An assessment of these sites removed those that could not realistically be considered developable, suitable and achievable, reduced the number to 14 site options that were the looked at in greater detail using both sustainability appraisal and an assessment of their strengths, weakness, opportunities and threats in terms of how they performed against the guiding criteria contained in WCS Core Policy 10. Based on these assessments and how well each strategic site option fitted with a development concept, four alternative strategies were compared, again using sustainability appraisal and SWOT assessment, and a preferred strategy selected. The process is set out diagrammatically below:
- 4.15** A preferred strategy has been selected and modified to take account of the risks and constraints identified through the assessment process. These proposals have also been subject to sustainability appraisal. As a result of this process the preferred strategy is summarised below.

## The Proposals

- 4.16** The assessment of strategic areas, site options and alternative strategies is set out in detail in the Chippenham Site Allocations Plan: Site Selection Report (May 2016). The preferred strategy represents a combination of development concepts that capitalise on the locational advantage of the A350 corridor.

---

33 Chippenham Site Allocations Plan: Strategic Site Assessment Framework, December 2014. For access to this document, please refer to the Chippenham Site Allocations Plan webpage.

34 Briefing Note 2: Definition of Strategic Areas, Updated January 2015. For access to this document, please refer to the Chippenham Site Allocations Plan webpage.

35 Chippenham Site Allocations Plan: Sustainability Appraisal Report, Atkins, April 2016. For access to this document, please refer to the Chippenham Site Allocations Plan webpage.



- 4.17** The Council has already granted consent for a significant development north of Chippenham, located in Area A (see above) for a mix of uses including up to 750 new homes (Land at North Chippenham 12/00560/OUT). This development would have access to the A350 and it would provide a road built to a distributor road standard offering the opportunity for it to have a wider role in the network. This road can also provide a clear visual and man-made boundary to the town. The evidence suggests that further development north would have detrimental landscape and ecological effects, in particular with respect to cumulative impacts on the value of Birds Marsh Wood County Wildlife site, and fails to meet Criterion 5 (Landscape) of Core Policy 10 without offering significant benefit over and above the development already permitted.

### **South West Chippenham**

- 4.18** Within Area E, SW Chippenham is an immediate phase of development geared to provide deliverable land for employment and housing. The proposals are to meet the great majority of land required urgently for employment development on an 18ha site at Showell Farm. This will provide serviced land for a variety of uses. Landscape impacts are acceptable and land for employment development is well located and can be brought forward relatively quickly. The SW Chippenham allocation comprises the Rowden Park site which is identified for approximately 1,000 new dwellings and 18ha land for employment and additional smaller extension sites identified for approximately 400 new dwellings. The housing trajectory indicates that about 1400 dwellings could be built in the remainder of the Plan period, looking to 2026 (see Table 6.1).

### **Rawlings Green**

- 4.19** Rawlings Green is a prominent area where development may have a wide landscape impact. Detrimental effects would need to be mitigated by an appropriate design and layout. Proposals require a low density of development and extensive strategic landscaping is identified for development at Rawlings Green. This would be capable of accommodating up to 650 new dwellings and 5ha of land for employment generating uses. Up to 200 new homes could be accommodated before a new link road is needed to connect the site over a new railway bridge to the distributor road provided as part of the North Chippenham development in Area A. This new road link will continue through the site to Monkton Park, which would provide a new access route to the A350 for the north of the town avoiding the town centre. It will serve the development itself and relieve current congestion that might otherwise worsen unacceptably on routes into and out of the town centre. It is an objective of this Plan that the route through North Chippenham connecting the B4069 with the A350 must be in place before any development commences beyond the first phase of 200 dwellings on the Rawlings Green allocation.
- 4.20** The two sites can accommodate a total of approximately 2,050 homes although it is possible that not all this number will be built within the plan period to 2026. At a late point in the current plan period allocated land may contribute to meeting housing requirements for the next plan period and reduce the potential for a fall off in housing supply while a new plan is emerging for the period beyond 2026. The scale of development recognises the additional complexity of ensuring deliverable land. The amount of land allocated results in a scale of development that therefore exceeds the requirements set out in the Wiltshire Core Strategy. A choice of new locations for new homes provides a flexible choice of deliverable sites in terms of a range of potential house builders and the choice of homes. It also recognises that it is possible that not all large strategic sites will be completed in the Plan period and the risks associated with the greater level of complexity involved in the delivery of large strategic sites.

- 4.21** Development at Rawlings Green involves building new roads in step with the development, including completion of a link between Cocklebury Road and the A350, together with the provision of a new bridge over the railway, in order to ensure there are no unacceptable traffic impacts and so that the wider benefits to the network are achieved as soon as possible. The proposals also include large new areas along the River Avon for country parks. These will provide easier and direct public access to the countryside for all residents and visitors. They will also include areas set aside to be managed to protect and improve their nature conservation value. As a substantial corridor of land it also provides opportunities for new and improved cycle and pedestrian links around the town, as well as to and from the town centre. These proposals go a substantial way to fulfilling a longstanding aspiration to capitalise on the River Avon as an asset to the town.
- 4.22** Both proposals safeguard the potential for future road alignments to the east and south of the town and require that their design and layout must not prohibit road connections in the future. This is based on evidence prepared for the Plan<sup>(36)</sup> that indicates an Eastern Link Road and/or a Southern Link Road may be longer term solutions to improving the town's network resilience. The policies ensure that development during the Plan period does not undermine the future development of the town and will enable further investment in roads to support the growth of the town if required in future plan periods.

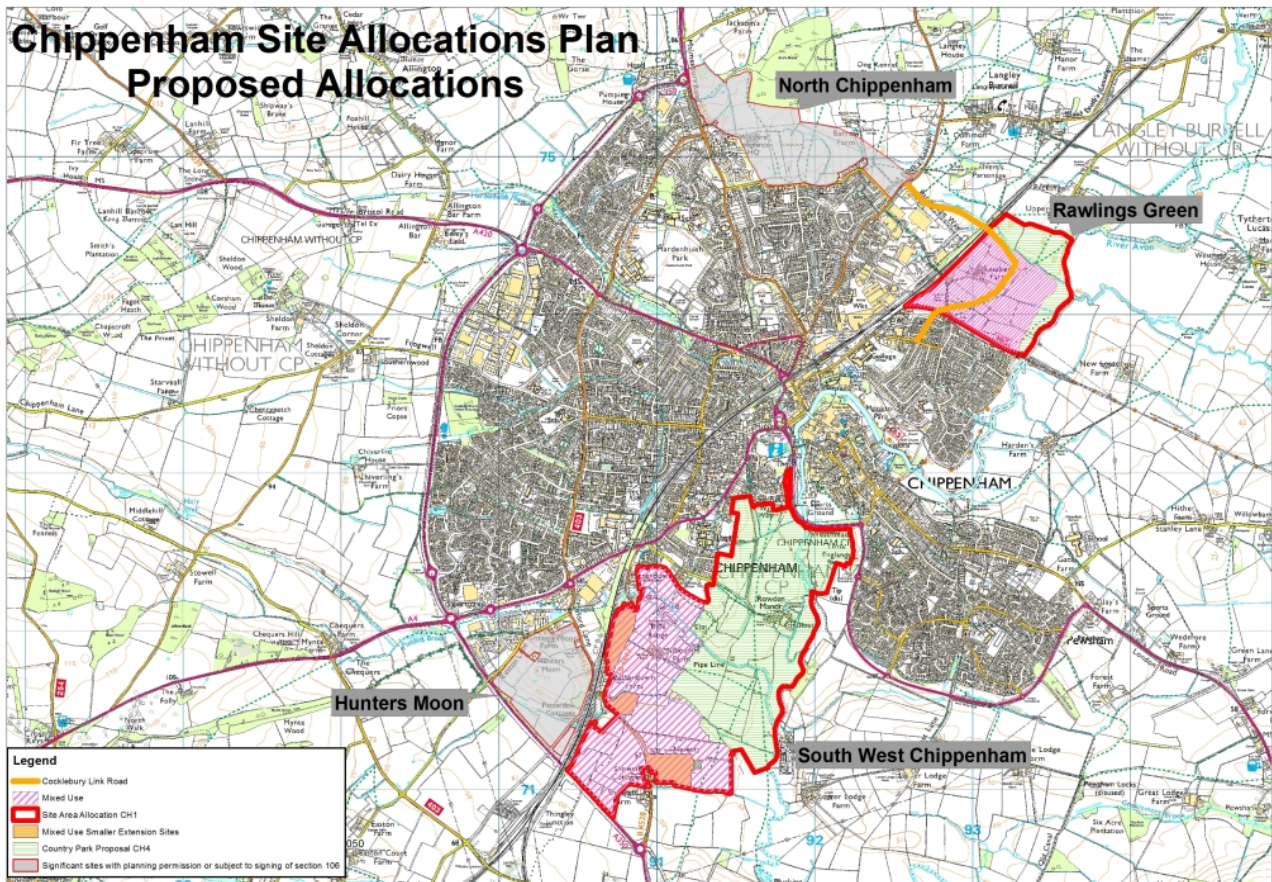
### Master plans

- 4.23** The following proposals establish the principles of development at South West Chippenham and Rawlings Green based on evidence prepared that is appropriate to plan making. Each policy also requires any application to be informed by a master plan which will reflect additional evidence prepared at a level of detail to support a planning application as well as the principles and requirements established in policies CH1 and CH2. Such evidence will include, but is not limited to, a Landscape and Visual Impact Assessment, Heritage Assessment, Biodiversity Report, surface water management plan, Flood Risk Assessment and Highways Statement. Such new evidence can be used as a material consideration when considering a specific planning application. A master plan will refine and provide a more detailed distribution of land uses for each site. Further detailed landscape assessment may suggest boundaries that have a better visual impact. A minor variation in site boundaries from those on the policies map may therefore be justified on new evidence presented at the time of the application.
- 4.24** Adopted standards for provision to meet leisure and recreation needs will be applied to each of the proposals. An audit of existing open space assets concludes that Chippenham does not have a shortage of outdoor sports provision. A shortage of amenity green space, parks and areas for informal recreation is addressed by provision for substantial open space by proposals contained in policy CH4.
- 4.25** A master plan will also include an explanation and show the nature and location of surface water management measures.
- 4.26** The proposals in the Chippenham Site Allocations Plan must be read in conjunction with the Wiltshire Core Strategy. Proposals for new development will be considered against all relevant policies, including those relating to place shaping and high quality design. As with all planning applications the general policies, for example affordable housing (Core Policy 45), sustainable construction (Core Policy 41), high quality design (Core Policy 57) in the adopted Wiltshire Core Strategy apply to the consideration of these sites. The developers

36 Position Statement Improving Network Resilience in Chippenham and Transport and Accessibility Evidence Paper Part 2a: Assessing Alternative Development Strategies

of strategic sites will prepare Sustainable Energy Strategies setting out how proposals meet carbon reduction targets, and identifying how maximum targets can be achieved, particularly where lower cost solutions are viable (such as Combined Heat and Power).

Picture 4.1 Composite plan of Chippenham Strategic Site Allocations



## Chippenham Settlement Boundary

**4.27** The Chippenham settlement boundary, referred to as Limits of Development in Core Policy 2 of the Wiltshire Core Strategy, is an important element of the development strategy for Chippenham. It essentially relates to the built up area of the town and provides a planning policy boundary to define the edge of the countryside and the extent of the built up area. The boundary is important for the application of many core strategy policies. Development and advances in digital mapping since the settlement boundaries were originally drawn means that in some locations the boundary as currently drawn no longer accurately relates to the built up area of the town. As part of the preparation of the Chippenham Site Allocations Plan the settlement boundary for the town has been reviewed using the principles set out below.

**4.28** Areas which have been included are:

- both built and extant reserved matters planning permissions for residential and employment uses for areas which are physically/functionally related to the settlement (subject to the exclusions below in paragraph 4.25)
- existing and extant planning permissions for community facilities, such as religious buildings, schools and community halls which are considered to be physically/functionally related to the settlement
- all uses and built development that is physically/functionally related to the settlement.

**4.29** Areas which have been excluded are:

- curtilages of properties which have the capacity to extend the built form of the settlement
- recreational or amenity space at the edge of settlements which primarily relate to the countryside (in form or nature)
- isolated development which is physically or visually detached from the settlement (including farm buildings or agricultural buildings, renewable energy installations)
- Outline planning applications
- Proposed site allocations.

**4.30** The justification for excluding outline planning applications and the proposed site allocations relate to the often general representation of land uses within these sites. For example, a strategic site allocation may include extensive areas of natural greenspace or country park to manage the transition from developed area to open countryside. Once such sites are developed the extensive areas of open space would be excluded from the settlement boundary following the principles above. Given that the settlement boundary infers a status which generally permits development within them, including such large areas of greenspace is inappropriate.

**4.31** The revised settlement boundary for Chippenham is identified at Appendix 2 and presents a proposed change to the Wiltshire Policies Map.

**4.32** A report on the consultation for the review of settlement boundaries which indicates where amendments have been made can be found on the [Chippenham community engagement webpage](#)<sup>(37)</sup>

---

37 The report has also been included as Annex E to the Chippenham Site Allocations Plan: Consultation Statement, February 2015

Draft

## 5 Site allocations

### South West Chippenham

Draft

## Policy CH 1

### South West Chippenham

#### Rowden Park Site

Approximately 171ha of land at South West Chippenham, as identified on the policies map, is proposed for a mixed use development to include the following:

- 1,000 dwellings
- 18ha of land for employment (B1, B2, and B8 uses of the Use Classes Order) adjacent to the A350
- Land for a 2 Form Entry primary school
- A local centre
- Approximately 100ha as a riverside country park
- strategic landscaping and open space to retain and reinforce existing hedgerows and establish new areas of substantial planting
- no more than 800 homes to be completed before the Cocklebury Link Road (from the A350 to Cocklebury Lane) is open for use or a set of comprehensive transport improvement measures of equivalent benefit.

Development will be subject to the following requirements:

1. surface water management that achieves equivalent or less than current Greenfield rates of run-off
2. provision of sufficient school capacity to meet the need created by the development
3. a marketing strategy to be agreed with Wiltshire Council and carried out to ensure the early release of serviced land for employment
4. enhanced routes for cycling and walking to and from the town centre
5. a design and layout that preserves or enhances the importance and settings to designated heritage assets
6. design and layout of development must not prohibit a potential future road connection to land to the east from the A350 to the river
7. measures to enhance the character of the Rowden conservation area
8. a design and layout that allows for the appropriate integration of the smaller extension sites included on the policies map.

Development will take place in accordance with a masterplan for Rowden Park, the main site, as shown on the policies map, approved by the Council prior to commencement. The master plan will be informed by detailed evidence which will include a Landscape Visual Impact Assessment, Heritage Assessment, Biodiversity Report, Surface Water Management plan, Flood Risk Assessment and Highways Statement.

#### Smaller Extension Sites

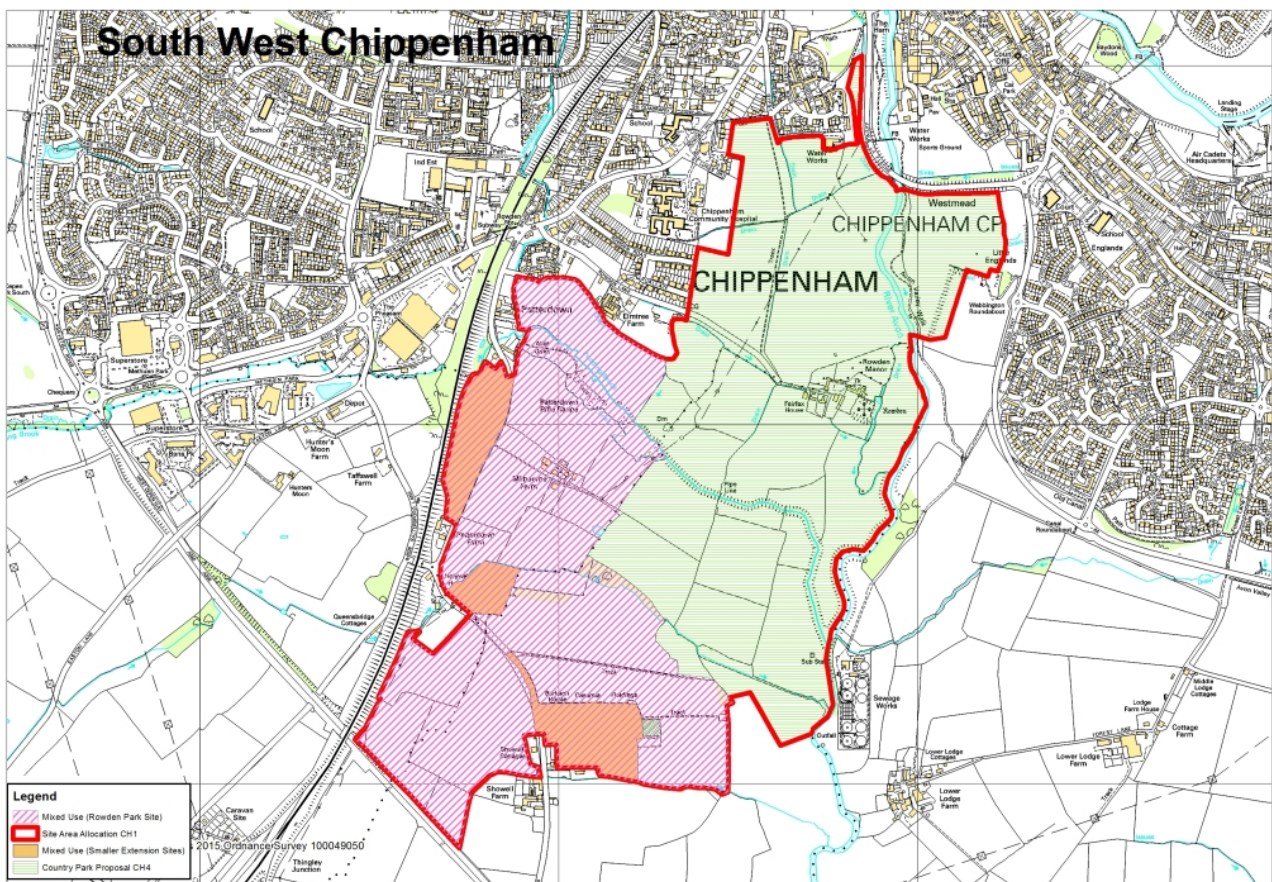
Approximately 11ha of land at South West Chippenham, as identified on the policies map, is proposed for residential development to include the following:

- Up to 400 dwellings
- Strategic landscaping and open space, including the retention of important hedgerows, where appropriate, to provide a 'soft' urban edge to development.

Development will be subject to the following requirements:

1. a design and layout that integrates with the Rowden Park site in terms of meeting local community needs and traffic management
2. that adequate infrastructure is available to serve the needs of the development
3. financial contributions towards provision of new schools and other infrastructure necessary to enable development to proceed
4. surface water management that achieves equivalent or less than current Greenfield rates of run-off
5. a design and layout that preserves the importance and settings to designated heritage assets

Picture 5.1 Indicative plan for the South West Chippenham strategic site allocation



- 5.1 The development of this area requires a comprehensive treatment to the western side of the River Avon valley south of Chippenham. To support a supply of deliverable land, treatment of the site will be divided between the Rowden Park site and smaller extension sites.
- 5.2 The Rowden Park site will provide a mixed use development and comprises the site allocation as shown on the Policies Map excluding the smaller extension sites. This will provide a mixed use development. Much smaller sites are likely to provide additional housing once the Rowden Park site progresses and as the urban area is extended outwards from the town.
- 5.3 Development will therefore be led by a single master plan for a predominant part of the site, the Rowden Park site, as shown on the policies map. Proposals for this site are well advanced and this site will set in place employment land, land for a new school and other infrastructure. Master planning will show comprehensive transport linkages within the allocation and to key destinations elsewhere. It is envisaged that further opportunities for development will arise



as development envelopes the other parcels of land, but as the detailed design and timing of these sites has yet to be determined, they need not form part of the Rowden Park site masterplan.

- 5.4** A key element of these proposals is the early release of serviced land for employment development for a range of uses. With easy access to the A350 and M4 the area will accommodate existing local businesses looking to expand and attract inward investment from further afield. The Council with its partners will play a proactive role in partnership with developers in order to ensure development can take place, by marketing the site, brokering discussions with interested business and exploring other initiatives in collaboration with the Local Enterprise Partnership. Development of the site will deliver serviced land, with road access, utilities and communications infrastructure, as a part of a first phase of development. A marketing strategy to be agreed with the Council will include details of the marketing campaign and site particulars. The marketing campaign should include (i) On site marketing boards displayed throughout the period in which the property is being marketed (ii) Registration on the Council's Commercial Property Database (iii) Web based marketing. Site particulars should include (i) Location Plan and description of the site (ii) Marketed Use of the Site including all options available to future owners (iii) Relevant Dimensions (iv) Relevant planning conditions or covenants (v) Known Costs.
- 5.5** The Rowden Park site divides into three distinctive areas that will each help to retain the mature network of hedgerows and trees which with areas of greenspace will provide linkages through development to the wider countryside and retain the distinctive enclosed mature setting to the landscape. Master plan work must address environmental issues around Patterdown Rifle Range operating within the allocation. Detailed design should also recognise the generally higher level of the road to the town. It should maintain this to provide some separation from development in order to help retain the rural character of the approach to the town, affecting the road users perception, and maintaining some of the wider views of the rural landscape.
- 5.6** To help limit traffic impacts, housing development will commence adjacent to the B4528 between Showell Farm and Milbourne Farm toward the south of the allocation. Improvements will be necessary to the A350 junction alongside other off-site measures necessary to mitigate the impacts of development. This will help to alleviate impacts on the local road network around the town centre and the Lowden Hill area.
- 5.7** The proposals include provision of a large area of informal open space that includes the landscape setting to the Rowden Conservation Area. The surrounding agricultural land contributes to the significance of Rowden Manor and farm, and the character and appearance of the Rowden Conservation Area. To ensure the significance of those affected heritage assets are safeguarded a further more detailed Historic Environment Setting Assessment will be required to inform the future Masterplan and the layout, design and appropriate distance of development from the boundary of the Conservation Area. Enhancing the attractiveness and improving access to this area will realise this area's potential as an asset to the town for informal recreation and leisure. This includes interpretation of the Civil War battlefield and the buildings and setting to Rowden Manor.
- 5.8** Land will be reserved within the Rowden Park site for a two form entry primary school. The estimated needs generated by the development of the main site do not by themselves require two forms of entry but reserving land allows for future expansion to accommodate the needs from development elsewhere or beyond the plan period.
- 5.9** If a river footbridge is considered as part of the master plan process it should be located as sensitively as possible to avoid impact on riparian habitats and provide improved pedestrian and cycle links to the town centre avoiding busy roads and bat flight lines. A riverside country

park will be managed to promote good pedestrian and cycle access to and from the town centre. Opportunities should also be explored to improve connections from the site to the Methuen Business Park.

- 5.10** Development plan policies <sup>(38)</sup> set out requirements for the additional open space and formal sports provision that will be necessary as a part of all new residential development. The riverside park should be designed and considered as part of the development proposals, including ecological surveys and assessments, protection and retention of existing valuable habitats, creation and restoration of floodplain and riparian habitats, and provision of wildlife corridors across the site from east to west. The most obvious east to west connection corridors for wildlife are the Pudding Brook and the Holywell stream (watercourse running from Holywell House).
- 5.11** The Pudding Brook area should be protected from development. The precise flood zone boundaries to the Pudding Brook will need to be defined and protected from development. The brook should be retained and enhanced through appropriate management and include a footpath or cycleway to the green space in the east. The Holywell stream to the south of Milbourne Farm is also a locally significant ecological feature. This should be retained and enhanced as part of development. An area in the northwestern part of the site around Patterdown should also be left undeveloped and incorporated into green space, enhanced for great crested newts through the creation of ponds and other wetland habitats, scrub and woodland.
- 5.12** Flood risk areas (zones 2 and 3) must remain undeveloped. This includes areas around smaller water courses within the site for which flood risk will also need to be assessed alongside the main river. Pudding Brook is one such area. Rates of surface water run off to the River must also remain at current levels or less in order to reduce the risk of flooding elsewhere. Consideration of flood risk and necessary improvements to the drainage network must precede detailed development proposals. This must involve determining accurate boundaries to flood risk areas and a set of effective sustainable urban drainage measures. These must take account of ground conditions and ensure sufficient land is set aside at the master plan stage. Any improvements to the water supply and foul drainage network should be put in place at the earliest opportunity. Any development impinging on designated groundwater Source Protection Zones must follow principles and practice necessary to safeguard them.

---

38 Policies CF2 and CF3 North Wiltshire Local Plan 2011 - Adopted June 2006 are set to be replaced by a new policy resulting from a partial review of the Wiltshire Core Strategy.

## Rawlings Green

### Policy CH 2

#### Rawlings Green

Approximately 50ha of land at Rawlings Green, as identified on the policies map, is proposed for a mixed use development to include the following:

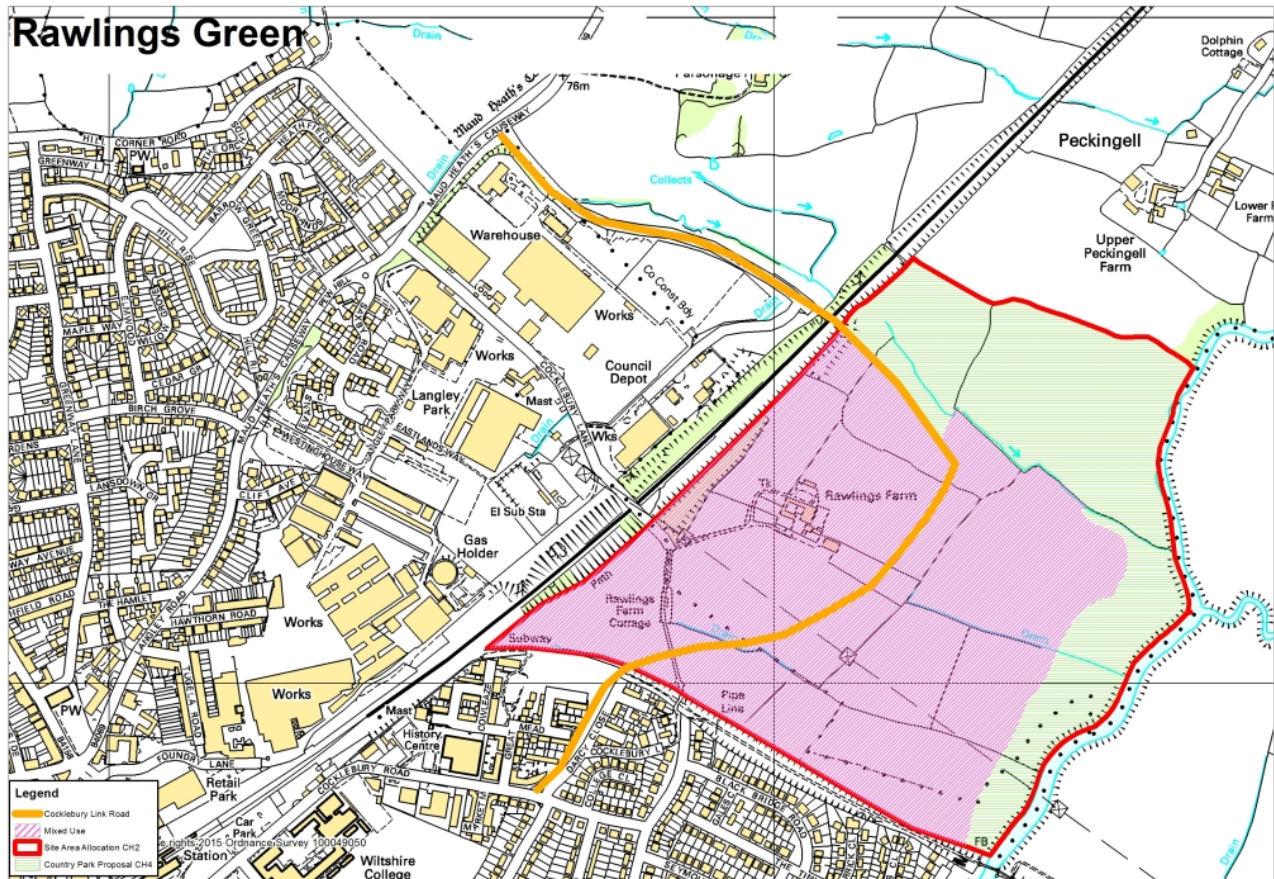
- No more than 650 dwellings, including a first phase of no more than 200 dwellings
- 5ha of land for employment generating uses (B1, B2, C2, D1 and D2 of the Use Classes Order)
- Land for a 2 Form Entry primary school
- A Link Road from Parsonage Way to Darcy Close, including connection over the main railway line and a road to Darcy Close (Cocklebury Link Road) to be completed and open for use as part of the first phase of development
- strategic landscaping and open space to retain and reinforce existing hedgerows and establish new areas of substantial planting, including strong groups of new tree planting along the lower eastern edge of development, in accordance with the principles set out at paragraph 5.12
- an approximately 10ha Country Park along the northern and eastern edge of new development linking to the existing recreation areas along the river to Monkton Park as indicated in Figure 5.2. No new buildings should be located in the Country Park unless they are ancillary to the use of the Country Park, or to the east of the 50m contour.

Development will be subject to the following requirements:

1. surface water management that achieves equivalent or less than current Greenfield rates of run-off
2. Completing a link between Cocklebury Road and the B4069 to be open for use, prior to the occupation of 200 dwellings, secured through measures attached to grant of planning permission
3. Development beyond the first phase of 200 dwellings shall not commence before the link road to the A350 is open for use or a set of comprehensive transport improvement measures of equivalent benefit is in place
4. Provision of sufficient school capacity to meet the needs created by the development
5. a low density design and layout that preserves the setting and importance of listed buildings on the site and, in accordance with principles set out in paragraph 5.12, screens and filters existing and proposed locations for mixed use development and avoids harmful visual impacts by development on exposed valley slopes
6. Design and layout of development must not prohibit a potential future road connection to land across the river to the south-east

All other aspects of development will take place in accordance with a master plan for the site approved by the Council prior to commencement. The master plan will be informed by detailed evidence which will include a Landscape Visual Impact Assessment, Heritage Assessment, Biodiversity Report, Surface Water Management plan, Flood Risk Assessment and Highways Statement.

Picture 5.2 Indicative plan for the Rawlings Green strategic site allocation



**5.13** The area slopes down to the River Avon. Flood risk areas (zones 2 and 3) must remain undeveloped. Rates of surface water run off to the River must also remain at current levels or less in order to reduce the risk of flooding elsewhere. Connection to the drainage network will also require enhancements off site. Any improvements to the water supply and foul drainage network need to be put in place at the earliest opportunity. Consideration of flood risk and necessary improvements to the drainage network must precede detailed development proposals. This must involve determining accurate boundaries to flood risk areas and a set of effective sustainable urban drainage measures. These must take account of ground conditions and ensure sufficient land is set aside at the master plan stage.

**5.14** The site is prominent to a wide area. It forms a backdrop for westerly views from the River Avon floodplain, public rights of way, Tytherton Lucas and the Limestone Ridge. Development must avoid adversely affecting the rural and remote character immediately around the site and increasing the visual prominence and urban influence of Chippenham over a much wider area. In particular, development must have appropriate regard to the setting of Langley Burrell and Tytherton Lucas conservation areas beyond the site, as well Rawlings Farm, a listed building within. A strategic landscape scheme should:

- Retain and reinforce planting along the edges of Chippenham (and along the North Wiltshire Rivers Route) to filter and reduce views of the urban edge from the wider countryside. Especially views from public rights of way close to Tytherton Lucas to help maintain the rural and remote character of this village
- Extend and manage linear woodlands and tree cover along the railway and towards the edge of the River Avon to help with screening, filtering and backgrounding of views towards existing (Chippenham) and proposed development

- Create bold landscape structure by reinforcing existing field boundaries with new hedgerow and tree planting and where possible creation of copses and linear woodlands. Development to be inserted within the bold landscape structure
- Seek opportunities to reinforce the riparian character along the River Avon and small tributaries flowing through the strategic area including retention/creation and future management of waterside meadows, pollarding willow trees, new areas of tree planting and multifunctional green links to new SuDS areas
- Development to be aligned to the grain of topography and existing contours through careful location of buildings and infrastructure avoiding unnecessary cut and fill earthwork operations
- Maintain the network of PRow, set within green corridors though the landscape to preserve the existing good links from Chippenham to the river and countryside to the east and to help integrate proposed development within the landscape
- Conserve and enhance the setting to the listed buildings at at Rawlings Farm; and Upper Peckingell Farm.

**5.15** Development is envisaged within a strong landscape framework and the capacity of this site has been estimated using a low density of 30 dwellings per net hectare.

**5.16** Large industrial buildings are unduly obtrusive because of the prominence of the site. The range of employment uses should therefore clearly exclude B8, warehousing and distribution uses that are likely to result in buildings on this scale. Removing B8 uses suggests a different style and scale of employment. Alongside this particular area's good location in relation to central Chippenham, there is therefore a different employment generating potential and a more flexible approach to provision and delivery alongside housing development.

**5.17** A new railway bridge represents an opportunity to enhance the value of the railway line to flora and fauna. Tree and shrub planting should help to create woodland, hedgerows and scrub to create or extend new habitats including roosting bat and nesting bird features within the bridge itself. This will create a wooded corridor along the western boundary. Southern boundary woodland should be extended to re-connect habitats to this area so there is an uninterrupted corridor east and west.

**5.18** Land will be reserved within the scheme for a two form entry primary school. The estimated needs generated by the development itself do not by themselves require two forms of entry this school will also be necessary to meet needs generated by development at North Chippenham. Development plan policies<sup>(39)</sup> set out requirements for the additional open space and formal sports provision that will be necessary as a part of all new residential development.

**5.19** The site is reasonably well located in relation to the town centre and development should include measures to enable as many trips as possible to the town centre to take place on foot, cycling or by public transport. This should include enhancing the attractiveness of the North Wiltshire Rivers Way. Open space will provide a connection to the river as a corridor for pedestrian and cycle access to the town centre. Nevertheless the site's location will inevitably place strains upon existing traffic corridors into and out of the existing built up area, parts of which are already congested. The completion of new traffic routes including a bridge over the railway will do much to address such problems and ultimately should improve existing conditions. This new road infrastructure structure therefore needs to be provided as soon as possible. Road proposals should demonstrate how the design of the route minimises visual impact and effects on local amenity.

39 Policies CF2 and CF3 North Wiltshire Plan 2011- Adopted June 2006 are set to be replaced by a new policy resulting from a partial review of the Wiltshire Core Strategy

- 5.20** Traffic modelling shows there would be unacceptable harm if development of the site exceeded 200 dwellings without completion of road infrastructure. A precise point below the occupation of the 200th dwelling when road infrastructure must be fully delivered will be set as a condition of planning permission and will be agreed as a part of negotiations with a developer. Land will be reserved in the vicinity of the eastern site boundary to facilitate the construction by a third party of a road over the river so as not to prohibit a future road connection to land to the south-east should one be required in future plan periods. Provision will be made within a legal obligation to ensure that the connection is deliverable by a third party if required in the future.

### **Cocklebury Link Road**

- 5.21** Rawlings Green is of a scale that it is necessary for it to have at least two different points of access.
- 5.22** It would not be acceptable for Rawlings Green to have one point of access to serve 650 dwellings. Neither, given its scale and location, would it be acceptable for it to be served by a second access which does not connect through to the first. Development of the site requires construction of a completed link road from Cocklebury Road via Darcy Close and a new bridge over the railway to Parsonage Way and the B4069 as an essential part of the first phase of development. The link road from the B4069 to the A350 must also be open to traffic or a set of comprehensive transport improvement measures of equivalent benefit must be in place prior to any development commencing beyond the first phase of development of the Rawlings Green site.
- 5.23** The overall result is a new route around Chippenham; a Cocklebury Link Road. This is necessary for development to be acceptable and is directly related to the development, appropriate in scale and kind. It will be an express part of any development scheme permitted and built by the site's developers.
- 5.24** Road improvements through Monkton Park have been carefully considered recognising the sensitivity of traffic levels to residents and the potential to worsen existing issues such as congestion and on-street parking.
- 5.25** Inevitably there are shorter term impacts before the link road is complete. In the absence of the Cocklebury Link Road, development at the 200 dwelling threshold for Rawlings Green is forecast to lead to a 30% increase in traffic flows on Cocklebury Road and up to a 55% increase in delay time experienced on the approach to the New Road / Station Hill junction, compared to the existing situation. This is expected to be a short term impact, as the Cocklebury Link Road would need to be open beyond the 200 dwelling threshold. Appropriate mechanisms will be attached to any planning permission to secure the delivery of the Cocklebury Link Road within a certain time based on the occupancy of dwellings and a time period. Conditions attached to the permission (for example which requires a phasing plan) or a Section 106 Agreement (which can be linked to a bond) are options available to the Local Planning Authority to secure timely delivery of the road. In implementing the Plan the Council will monitor the delivery of the necessary infrastructure to ensure that development comes forward in a timely and coordinated fashion. It will, with its partners, play a pro-active role in collaboration with developers to ensure the completion of the new link road to the A350 and the railway bridge. In this regard, it will use its powers, including its ability to resolve financial imbalances, for example by providing early funding to accelerate the provision of infrastructure or in circumstances where delivery is significantly delayed and there are no other options, by using its compulsory purchase powers.
- 5.26** Once complete and the benefits of the Cocklebury Link Road, in particular for residents of Monkton Park, are:

- In pure infrastructure terms, the Cocklebury Link Road doubles road capacity for traffic entering and leaving the existing Monkton Park area – there would be two single-carriageway routes rather than the present one single-carriageway route;
- With the Cocklebury Link Road open and 650 dwellings at Rawlings Green, traffic flows and delays on Cocklebury Road / Station Hill are forecast to be at levels that are similar to those experienced now; and
- Traffic modelling evidence justifies a threshold for completion of the CLR, at the latest, by the occupation of 200 new dwellings served via Darcy Close. This is a requirement of the proposal. Sufficient commercial incentive exists to ensure that developer will comply. The delivery framework explains responsibilities and additional steps necessary to co-ordinate timely completion.

**5.27** The policies map shows geographically an alignment for the road

## **Chippenham Riverside - country parks.**

### **Policy CH 3**

#### **Chippenham Riverside Country Parks**

**Land adjacent to and relating to the River Avon running through allocations at South West Chippenham and Rawlings Green will be developed for use as country parks, to include the following uses:**

- **informal open space**
- **extended existing and new rights of way**
- **areas for protection and enhancement of nature conservation interest**
- **sports pitches**
- **enhanced routes for cycling and walking to and from the town centre**

**Development will be subject to the requirements that no new buildings or structures are built within flood risk areas.**

**The use of these areas will take place in accordance with a management plan approved by the Council.**

**5.28** Proposals for strategic sites involve substantial new areas set aside for country parks which will help the strategic sites integrate with the town. The primary aim of these areas will be to improve public access to and enjoyment of the countryside. Existing assets and features will be enhanced, such as around the Rowden Conservation Area. There will be greater scope for new uses in other areas, for example for more formal use as sports pitches. Evidence also highlights the important nature conservation value of many of the features and habitats in these areas and their inclusion within a country park is one means to achieve their protection and enhancement in perpetuity. A key role will also be for these areas to provide improvements to the rights of way network through introducing new green corridors. The great majority of the land identified lies within flood risk areas and is unsuited to sensitive uses or any new building.

**5.29** In order to ensure these objectives are achieved in a complementary and comprehensive manner the management and use of new country parks will be directed by a management plan that will be approved by Wiltshire Council with the involvement of local stakeholders and land owners alongside specialist interests such as the Wiltshire Wildlife Trust. Master

Plans for each strategic site proposal (CH1-2) will define the precise boundaries to country parks and will show pedestrian and cycle routes across them necessary to connect the new development to the town centre and to other key destinations elsewhere.

- 5.30** The proposed country park areas are shown on the policies map and Figures 5.1 and 5.2. It is envisaged that the long term management of the country parks will be secured through planning obligations relating to individual sites. Further work is being undertaken to develop the ownership, governance and detailed management of the Country Parks <sup>(40)</sup>.

### **Strategic Transport Network (A350 at J17 of M4)**

- 5.31** The strategic transport network is illustrated in Figure 4.1a of the Wiltshire Core Strategy <sup>(41)</sup> and includes the M4 in Wiltshire as part of the Strategic Road Network (SRN) and the A350 as part of the Primary Route Network (PRN). Core Policy 66 of the Wiltshire Core Strategy establishes a commitment to maintain, manage and selectively improve the A350 corridor to support development growth at Chippenham, Melksham, Trowbridge, Westbury and Warminster and maintain and enhance journey time reliability <sup>(42)</sup>. In addition, as recognised at paragraph 2.16 of the Plan, the Swindon and Wiltshire Local Enterprise Partnership prioritise investment in improvements to the A350 which has resulted in the partnership securing funding for a A350 Improvement package through the Growth Deal <sup>(43)</sup>.
- 5.32** Working in conjunction with Highways England, evidence has shown that the proposals of the Plan will have a cumulative severe impact on Junction 17 of the M4 which will result in queuing on both the M4 mainline and the A350 at Junction 17 by 2026. This presents both a safety issue and operational performance issue which will result in reduced journey time reliability and potential for increased vehicle conflict on the high speed network.
- 5.33** Wiltshire Council and Highways England recognise the need for the part signalisation of the junction to resolve these issues. Design and delivery of the proposed work will be agreed with Highways England and set out within the Chippenham Transport Strategy. Detailed work is being undertaken to implement a scheme within the current highway which incorporates protection for the geological SSSI associated with the west bound of slip road.

---

40 Chippenham Riverside Country Park Future Management Draft Report by Natural England and Wiltshire Council, May 2016

41 Wiltshire Core Strategy Figure 4.1a Wiltshire Key Diagram (Strategic Transport Network)

42 Wiltshire Core Strategy core policy 66 and paragraph 6.174

43 Swindon and Wiltshire Strategic Economic Plan: Swindon and Wiltshire Secure £129 million Growth Deal, 19 December 2014



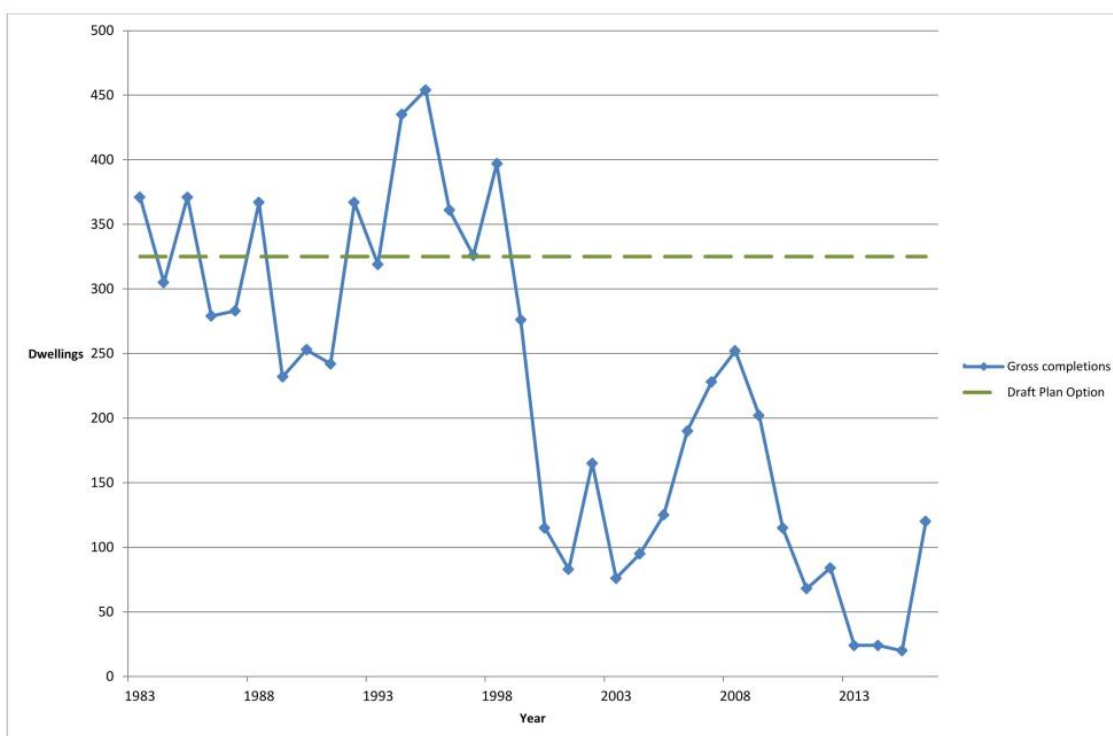
Draft

## 6 Monitoring and Implementation

### Housing delivery

6.1 Figure 6.1 below illustrates the decline in housing completions over recent years due, in part, to a lack of available sites in Chippenham and the downturn in the economy. The average gross completions over this period can be compared to the minimum housing requirement set in the Wiltshire Core Strategy and the preferred option put forward in this Chippenham Site Allocations Plan.

Picture 6.1 Chippenham housing completions 1983 - 2016 compared to average future anticipated completions based on proposed Plan option



6.2 The following table demonstrates the anticipated housing delivery trajectory for the three strategic site allocations identified in this Plan.

Table 6.1 Housing delivery trajectory for Chippenham site allocations

Year	Rawlings Green (Area B)	South West Chippenham (Area E)	Annual total	Cumulative total
2016/17				
2017/18		60	60	60
2018/19	20	150	170	230

Year	Rawlings Green (Area B)	South West Chippenham (Area E)	Annual total	Cumulative total
2019/20	80	175	255	485
2020/21	80	175	255	740
2021/22	155	175	330	1070
2022/23	155	200	355	1425
2023/24	160	200	360	1785
2024/25		90	90	1875
2025/26		50	50	1925
2026/27		50	50	1975
2027/28		50	50	2025
2028/29		25	25	2050
<b>TOTAL</b>	<b>650</b>	<b>1400</b>		<b>2050</b>

**6.3** The delivery of housing at each of the allocated sites will be monitored in the council's Housing Land Supply Statement.

## Community Infrastructure Levy (CIL)

**6.4** In May 2015, Wiltshire Council adopted a Community Infrastructure Levy (CIL) Charging Schedule<sup>(44)</sup>. CIL is a charge that local authorities in England place on development in their area. The money generated through the levy contributes towards the funding of infrastructure to support growth. The council is restricted in its ability to pool infrastructure contributions from new development through the existing mechanism of Section 106 agreements.

**6.5** The Charging Schedule has differential charging rates based on the type and location<sup>(45)</sup> of development. The Charging Schedule also has a reduced CIL rate for residential development within the strategically important sites as identified in the Wiltshire Core Strategy. This is due to the higher cost of delivering the critical on-site infrastructure needed to unlock the development potential of these strategically important mixed use sites. However, as a result of the removal of the Chippenham strategic sites formerly allocated in the Core Strategy, there is not a reduced rate for the sites identified in this Chippenham Site Allocations Plan. To reflect the fact that the standard rate of CIL is to be charged for the strategic sites in Chippenham, the Council is seeking fewer off site funding contributions than usual because a much higher proportion of infrastructure investment will need to be sourced from the CIL. This avoids an unacceptable burden on developers but necessitates much closer collaboration and co-ordination around how CIL funds are used to support growth.

44 Wiltshire Community Infrastructure Levy. For access to this document, please refer to the Chippenham Site Allocations Plan webpage.

45 See charging zone maps within the submitted Draft Charging Schedule.

## Viability

- 6.6** For the CSA Plan to be found sound the proposed allocations within the Plan must be deliverable. Sites will only be delivered if they are viable. Paragraph 173 of the National Planning Policy Framework states:

*'To ensure viability, the costs of any requirements likely to be applied to development, such as requirements for affordable housing, standards, infrastructure contributions or other requirements should, when taking account of the normal cost of development and mitigation, provide competitive returns to a willing land owner and willing developer to enable the development to be deliverable'.*

- 6.7** The proposals in this plan include significant infrastructure costs, therefore, in December 2014, Wiltshire Council appointed consultants BNP Paribas to undertake an assessment of the viability of the proposed strategic site allocations.
- 6.8** The main objective of the study was to assess the viability and deliverability of the development proposed at each of the strategic sites under consideration in the council's preferred option for growth. Of particular importance was the need to establish that the level of development proposed at each strategic site allocation would be sufficient to provide the road infrastructure identified with it, alongside other necessary infrastructure and policy requirement. The study concluded that the proposed site allocations identified within CSA Plan are deliverable within the current policy context and on the basis of the general assumptions made in the report including in relation to land values and house prices<sup>(46)</sup>.

## Monitoring

- 6.9** The Council monitors the number of new homes built each year and surveys businesses. The developers of strategic sites also provide their estimates of how many dwellings they forecast being built each year. These forecasts are the basis for the housing trajectories given above. The Council's Infrastructure Delivery Plan co-ordinates investment in capital projects over the plan period and the operation of the community infrastructure levy involves assessing and prioritising projects according to local need.
- 6.10** The Plan proposals provide a clear framework for development to take place over the period to 2026. The Plan also co-ordinates the provision of new roads with the rate and scale of development in order to ensure that growth does not ever outpace the ability of the local network to absorb it. The selection of different locations provides the best prospects of growth progressing at the rates anticipated without a dependence upon just one or two sites. It should also encourage competition between developers and help to ensure a better choice of new homes. The proposals must also be treated with a degree of flexibility when individual planning applications are considered and if other material considerations arise.
- 6.11** The Plan's strategy will need to be reviewed should rates of development fall consistently short of the forecast rates and other measures to stimulate growth would not be effective. Annual monitoring should help to highlight any unforeseen barriers to development. As one potential obstacle, the Council will be proactive in helping to progress new roads to support growth but there may be other unforeseen factors. Serious mid to long term land banking by volume house builders will frustrate the Plan's strategy and undermine achieving Plan objectives. A particular cause for concern would be a failure to secure the availability of land for employment development. Circumstances such as these will prompt a review of relevant proposals or the entire Plan.

46 Chippenham Sites Allocations Plan: Strategic Site Viability Assessment, April 2016. For access to this document, please refer to the Chippenham Site Allocations Plan webpage.

**6.12** The Wiltshire Core Strategy sets a requirement for ‘at least’ 4,510 additional dwellings over the period 2006 and 2026. This raises concerns that development rates may far exceed what the community, local environment and infrastructure can support. Road infrastructure provision is directly linked to development as it progresses. The provision of schools and other facilities necessary to serve development will be determined through the individual master planning processes for each strategic site that will be considered in detail and in partnership with the local community involved. Insufficient provision of infrastructure may lead to unacceptable impacts on the environment and may amount to grounds for refusing planning applications that far exceed scales of development on strategic sites in the Plan, but if overall scales of development far exceed those forecast in the Plan the Council will also review all or relevant parts of the Plan.

**6.13** To monitor the implementation of the CSAP the Council already has in place the Wiltshire Monitoring Framework (WMF) which was developed to support policies in the Wiltshire Core Strategy. The WMF is reported on in the Annual Monitoring Report (AMR). In relation to Chippenham the following indicators are included based on the Wiltshire Core Strategy proposals for the community area:

- Permissions granted or refused that support policy
- NOMIS official labour market statistics (e.g. Ratio of resident workers to jobs)
- % of new and converted dwellings on previously developed land
- Quantum of houses and employment land delivered since the start of the plan period.

In relation to the delivery of employment land the WMF also includes data collection on the quantum of land developed for employment by type across the whole of Wiltshire.

**6.14** The indicators listed above remain relevant to the delivery of the Chippenham Site Allocations Plan and will monitor the delivery of housing, employment land and the employment led strategy. In order to provide greater clarity for when a review of the Plan should be triggered and to ensure infrastructure is provided in a timely manner the following additional indicator will be added to the Wiltshire Monitoring Framework.

Indicator: Average annualised total completions from allocated sites

Target: 162 (1,780/11) dpa.

Triggers for review (including assessing need to respond to any barriers to growth):

- a. 3 consecutive years where delivery of housing from the allocated sites fall below 162 dwellings per annum starting from 2018.
- b. Fewer than 480 dwellings built from within Chippenham site allocations by 2020

## Risk Management

**6.15** A part of monitoring the effectiveness of the Plan will be to maintain a risk register. An outline of main risks is as shown in the table below. It will be a task of the group to manage risks by identifying responsibilities and different mitigation measures that are either preventative or contingencies.

**Table 6.2 Chippenham Outline Risk Register**

	Generic	Site Specific	Assessment
Unavailable	Land not made available by land		All land included within SHLAA is considered available. All land owners

	<b>Generic</b>	<b>Site Specific</b>	<b>Assessment</b>
	owners or no clear undertaking to do so		have indicated a willingness to release land for development but no firm agreement between land owners to ensure comprehensive approach.
Unsuitable	Location cannot be developed, employment land requirements will not be met or significantly less developable land	No employment land is made available, is reduced in scale or is delayed	Current application for significant provision for employment land at Showell Farm. Form of employment provision at Rawlings Green has yet to be agreed and developer aspirations may not conform to plan objectives.
		Development increases flood risks	Design of sustainable drainage measures advanced west of the river at SW Chippenham. Sustainable drainage measures appear at an early stage at Rawlings Green. No indication that effective measures are impossible to implement. Little risk that larger amounts of land may be required, reducing developable area.
		Development has an unacceptable impact upon heritage assets	Significance of heritage assets and their setting have been assessed and mitigation considered possible. Development at SW Chippenham has less than substantial harm. Further detailed work required at Rawlings Farm.
		Development has unacceptable visual impacts	Development at SW Chippenham within existing visual envelope of urban area. Low density at Rawlings Green appears to be accepted by developers.
Unachievable	Unrealistic prospect of significant development within 5 years	Access cannot be achieved to Darcy Close from Rawlings Green	Detailed design stage has been reached and there is agreement in principle between land owners.
		Access cannot be achieved to Parsonage Way and A350	Detailed design stage has been reached and there is agreement in principle between land owners.
Viable	Insufficient incentive for land owner/developer	There are 'big ticket' infrastructure items and it has not been established that a	Developer has submitted planning application for SW Chippenham. No developer yet firmly associated with taking forward detailed proposals at Rawlings Green.

	Generic	Site Specific	Assessment
		development can fund this and other policy requirements (such as affordable housing)	
		Inadequate level of affordable housing (less than 40%)	

Draft

## 7 Glossary

**Briefing Notes:** A series of notes to provide background information on a number of recurring questions about the content of the plan and the process for preparing the plan

**Cocklebury Link Road:** A road from Parsonage Way, over the railway line and via Darcy Close to Cocklebury Road that provides a second access to Monkton Park.

**Core Strategy:** A Development Plan Document setting out the spatial vision and strategic objectives of the planning framework for an area, having regard to the Community Strategy.

**Examination in Public (EiP):** An independent examination of draft plans.

**Evidence Papers:** a set of documents that summarises the information described in the Strategic Site Assessment Framework. Separate evidence papers cover each of the Chippenham Core Strategy Criteria.

**Site Selection Report:** A report explaining the Council's choices of preferred areas and site options drawing on evidence guided by the Strategic Site Assessment Framework and Chippenham Core Strategy Criteria.

**Strategic sites:** Major development that delivers a mix of uses, critically local employment as well as homes, but also all the infrastructure (for example: primary schools, community facilities, formal and informal recreation facilities and often local shops and services) necessary to support the development of the site and wider impacts of significant growth (often funding contributions to facilities and infrastructure elsewhere made necessary by needs arising from development, for example, leisure facilities or bus services).

**Sustainability Appraisal (SA):** An appraisal of the impacts of policies and proposals on economic, social and environmental issues.

**Strategic areas:** The different broad directions for long term growth at Chippenham. Five areas have been identified for assessment. They are defined by significant obstacles to development such as transport corridors and the river and included on a diagram in suggested changes to the Wiltshire Core Strategy.

**Site options:** detailed proposals for strategic sites. Located within a strategic preferred area, their extent is shown on an ordnance survey base. These include an estimated number of new homes and the area that will be developed for new employment. The proposals also include specific requirements for new infrastructure necessary to serve the development and other requirements to ensure it takes an acceptable form.

**Strategic site assessment framework:** How each of the six criteria set in the Wiltshire Core Strategy will be used to assess site options and strategic areas.

**The Chippenham 'core strategy' criteria (CP10 criteria):** The six criteria setting out the principles guiding the selection of strategic sites around Chippenham, as established in Core Policy 10 (the Chippenham Area Strategy) of the Wiltshire Core Strategy.

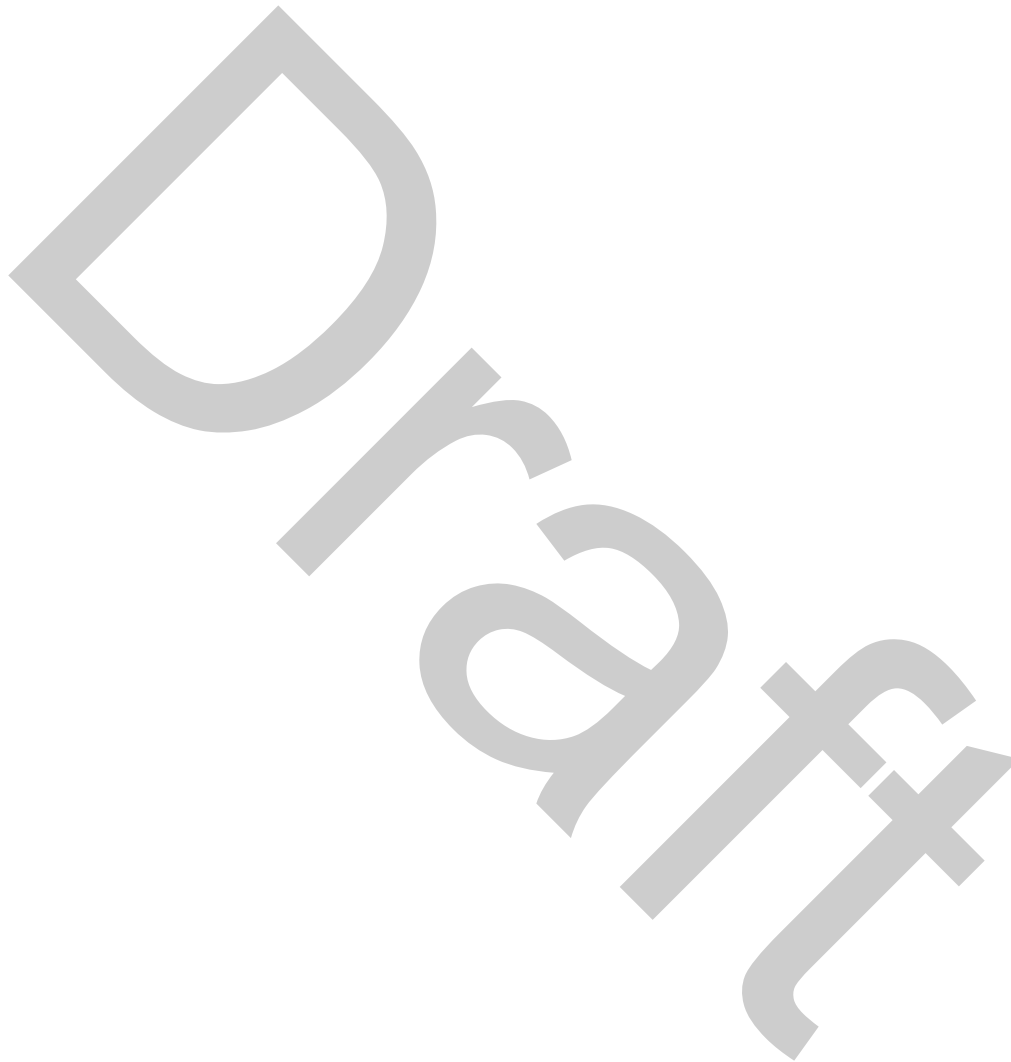


Draft

## 8 Appendix 1

### Appendix 1: Proposed Changes to the Wiltshire Policies Map - Site Allocations

Figure 8.1 South West Chippenham policy map



# South West Chippenham

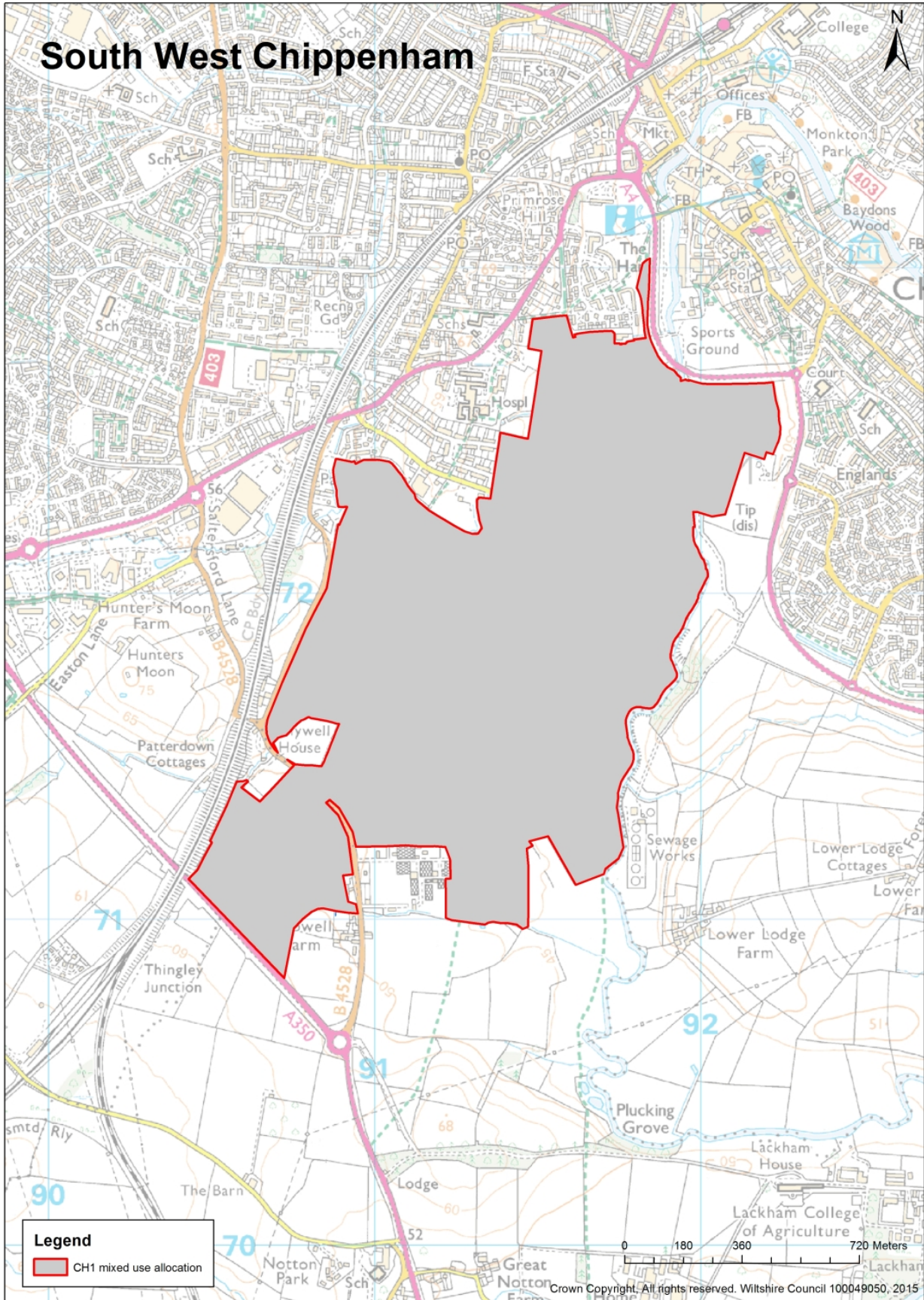


Figure 8.2 Rawlings Green policy map

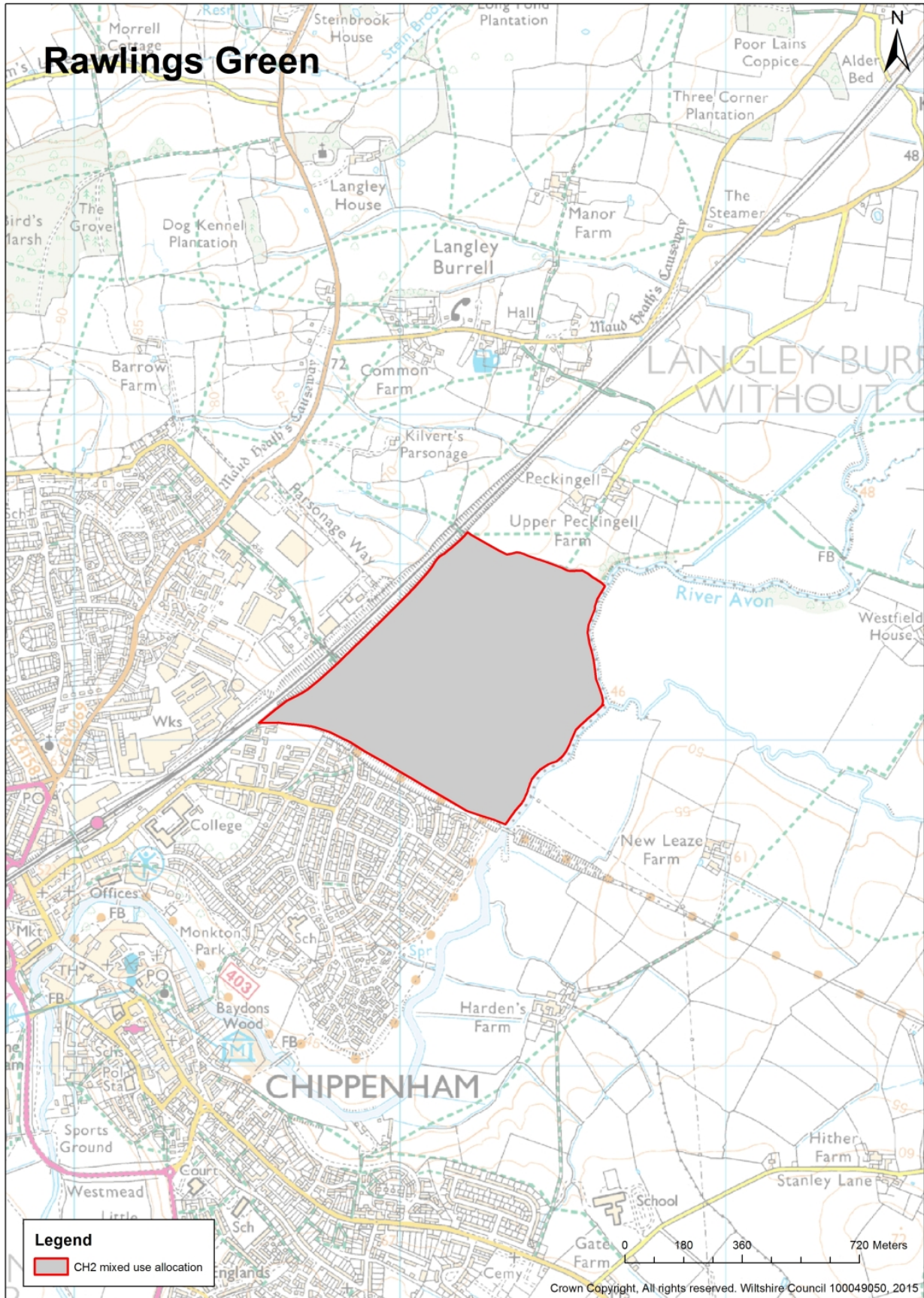
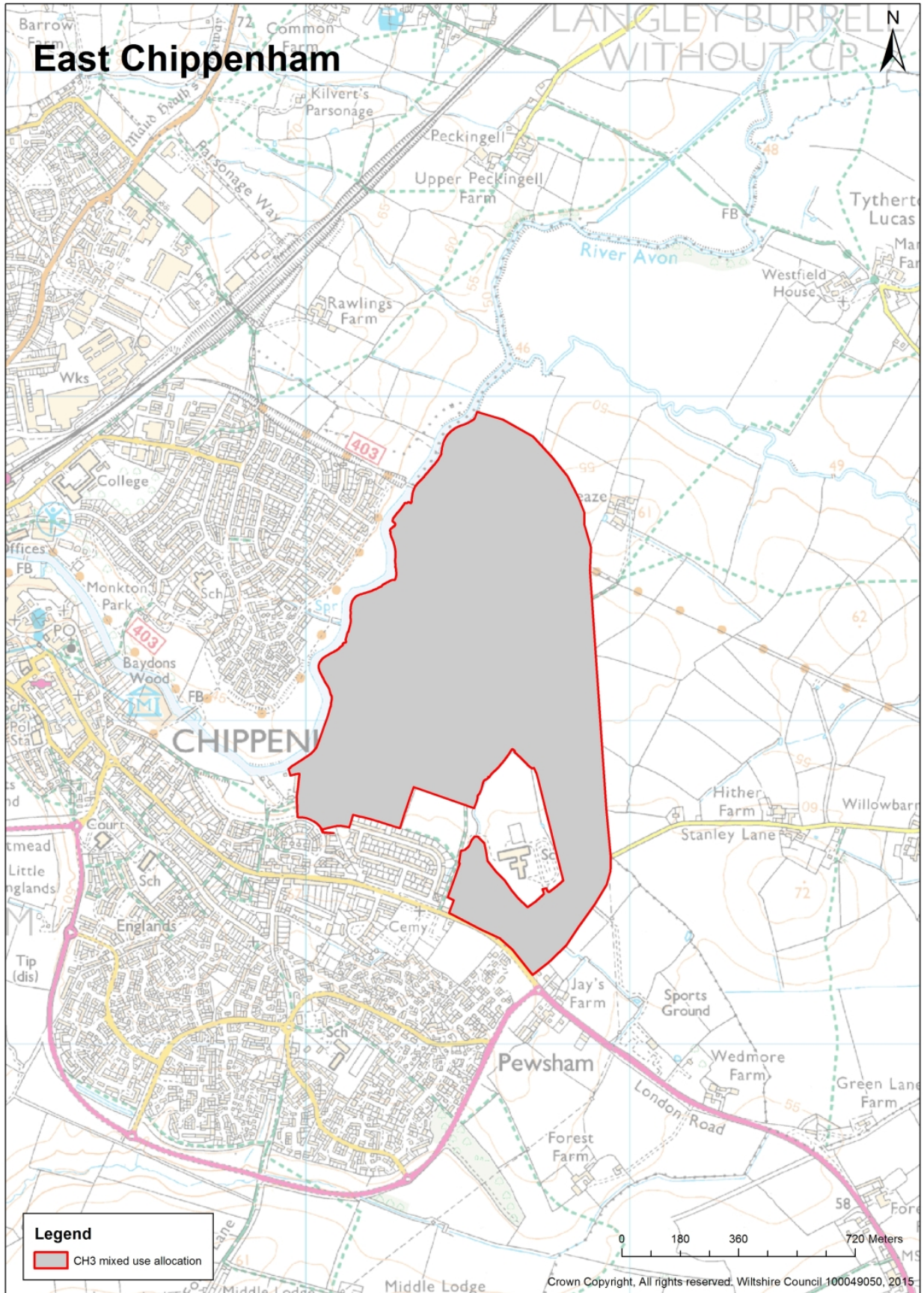


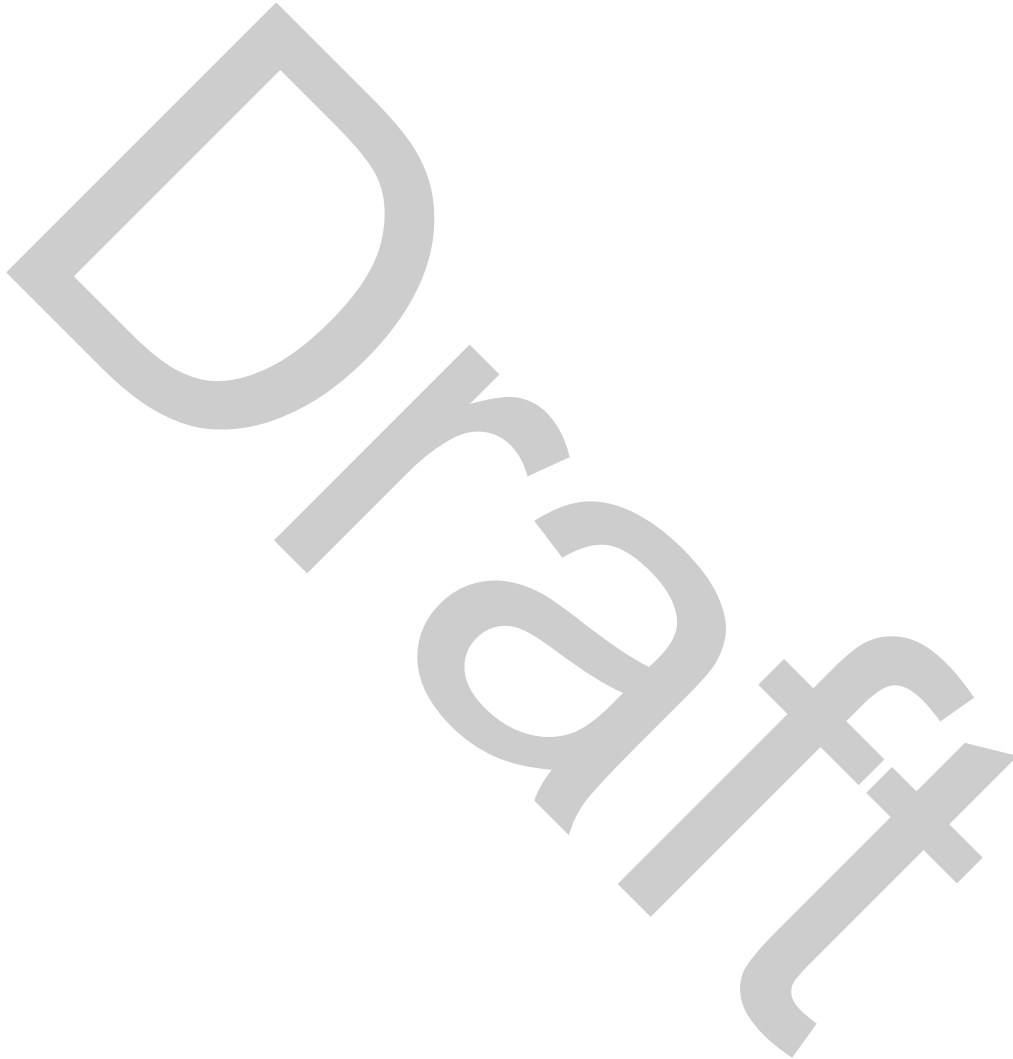
Figure 8.3 East Chippenham policy map

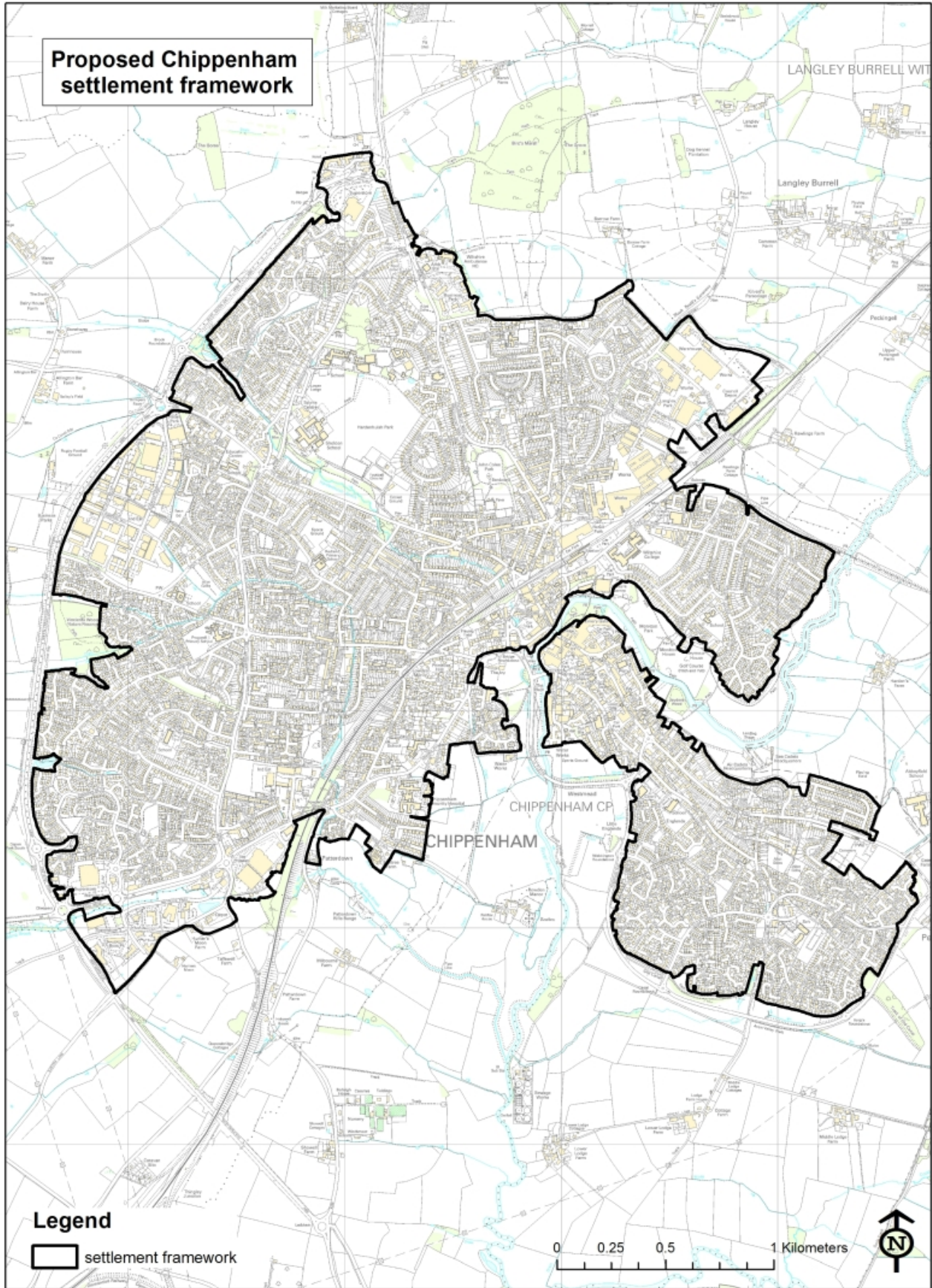


## 9 Appendix 2

### Appendix 2: Proposed Changes to the Wiltshire Policies Map - Chippenham settlement framework

Figure 9.1 Chippenham settlement framework





Crown Copyright, All rights reserved. Wiltshire Council 100049050, 2015

Draft



# Chippenham Site Allocations Plan February 2017

Draft

This page is intentionally left blank

## Appendix 3: List of Additional Modifications to the Chippenham Site Allocations Plan

Additional Modifications can be identified at the discretion of the Council under the Planning and Compulsory Purchase Act 2004 (as amended), s23, (3(b))<sup>1</sup>. These have been identified for completeness and relate to typographical errors or minor factual updates.

The additional modifications below are expressed in the conventional form of ~~striketrough~~ for deletions and underlining for additions of text.

The page numbers and paragraph numbering below refer to the submission draft local plan. The column 'Previous Change Number' provides the published reference in either CSAP/11 or CSAP/15 for reference. These were identified by the Inspector as Additional Modifications rather than Main Modifications either in his letter of the 4 August 2016 or in his Final Report.

The list is provisional as final checks for accuracy and consistency still need to be completed.

### Additional Modifications

Ref	Previous Change Number	Page	Policy/ Paragraph	Additional Modification
AM1	S1	4	1.6	Add at the end of the bulleted list:  " <u>Evidence Paper 7 : Heritage Assets</u> "
AM2	S88	5	1.10	Amend paragraph 1.10 as follows (amend figures within Appendix 1 accordingly):  "On adoption, the Wiltshire Policies Map will be amended to include the mixed use

<sup>1</sup> "3) The authority may adopt the document - (b) with the main modifications and additional modifications if the additional modifications (taken together) do not materially affect the policies that would be set out in the document if it was adopted with the main modifications but no other modifications."

				strategic sites allocated in this plan at Rawlings Green and <u>South West Chippenham and East Chippenham</u> as indicated at Appendix 1.”
AM3	S3	10	Strategy Box	Amend reference  Wiltshire Core Strategy, <u>adopted January 2015, paragraph 5.46 and 5.47 and 5.47a</u>
AM4	S115	10	2.14	Amend paragraph 2.14 as follows:  “How the outcomes from the duty to cooperate has informed the preparation of the <u>Chippenham Site Allocations Plan</u> is set out in a separate report”
AM5	S92*	12	2.26	Amend reference  Chippenham Site Allocations Plan: draft Statement on Duty to Cooperate, <u>February July 2015</u>
AM6	S2	8	2.6	Insert additional paragraph 2.6a as follows:  “ <u>The centre of Chippenham has a designated conservation area. The Chippenham Conservation Area Management Plan (Adopted April 2010 as Supplementary Planning Guidance) provides development guidelines, which include protecting the settings of these and other key assets within the town. The churches of St Andrew and St Paul have tall steeples and are prominent in views of the town. This prominence reflects a deliberate design intention, and the setting of these assets therefore includes the wider landscape in which they are experienced. There are a number of significant assets within the town including:</u> <ul style="list-style-type: none"> <li>• <u>Grade I listed The Ivy, The Yelde Hall and Sheldon Manor</u></li> <li>• <u>Grade II* St Andrew’s Church, Hardenhuish House, St Paul’s Church and St Nicholas’s Church</u>”</li> </ul>
AM7	S89	15	3.2	Amend reference in paragraph 3.2 as follows: “The Core Strategy establishes that the strategy for growth at Chippenham should focus on mixed use strategic sites (paragraphs <u>5.554a</u> ).”  (Wiltshire Core Strategy, January 2015, paragraph <u>5.46 and 5.47 and 5.47a</u> )
AM8	S93	16	3.5	Amend reference in paragraph 3.5 as follows :

				(Evidence Paper 1 Economy Interim Paper December 2014 July 2015)
AM9	S6	17	3.7	<p>Amend paragraph 3.7 as follows:</p> <p>“Evidence Paper 2 includes a specific statement on education <sup>(23)</sup>. In relation to secondary schools there is some capacity over the early years of the plan period at all three secondary schools (Hardenhuish, Sheldon, Abbeyfield), with the most capacity at Abbeyfield School. However, this capacity will not accommodate all the planned growth anticipated in the plan period so it is essential that the plan identifies opportunities to respond to future need. In relation to primary education there is a desire to rationalise primary school provision to include more two form entry schools as this size has advantages in revenue funding, sustainability and in teaching and learning. The revenue funding advantages include being able to achieve significant economies of scale, being more able to employ specialist staff and having a larger base budget that is more able to cope with fluctuations in income that result from changing pupil numbers. The proposals of the plan <del>should seek to enable this change</del> <u>therefore focus on provision for two form entry primary schools as a part of the development of strategic sites.</u>”</p> <p>(Evidence Paper 2: Housing and Community Facilities, Interim Paper Updated January July 2015)</p>
AM10	S7	17	3.8	<p>Amend paragraph 3.8 as follows</p> <p>“Improvements are planned to improve how the A350 works and development at Chippenham must not undo these benefits. Congested road corridors and junctions within the town impede and can deter travel to the town's businesses, services and facilities. In particular, congestion in and around the town centre, as recognised by the Chippenham Vision, needs to be addressed as a part of planning for the town's growth. <u>This also goes for management measures to prevent negative impacts on junction 17 of the M4 motorway. Joint working with Highways England helps to identify the cumulative impacts of growth on the strategic road network and will inform measures to improve junction 17.</u>”</p>
AM11	S94*	18	3.10	Amend reference in paragraph 3.10 as follows:

				<p>"Evidence Paper 4: Landscape Assessment (26) and Evidence Paper 5: Biodiversity (27)"</p> <p>(Landscape Assessment <del>Interim Evidence Paper December 2014</del> <u>July 2015</u> Biodiversity <del>Interim Evidence Paper December 2014</del> <u>July 2015</u>)</p>
AM12	S8	18	3.11	<p>Amend paragraph 3.11 as follows</p> <p>"The allocation and development of strategic sites will inevitably bring about fundamental change from rural to urban <del>to</del> areas around the town. The landscape surrounding Chippenham provides the setting to the settlement, defining its edges and also providing characteristic glimpses from the town out to the countryside. <u>Evidence Paper 4: Landscape Assessment</u> <sup>(26)</sup> <u>also raised specific concerns about protecting the setting and historic value of the conservation areas and heritage assets within each Strategic Area.</u> Development should seek to respect the important landscape features that make up this character and look to capitalise on opportunities to protect and enhance local <u>heritage assets as well as biodiversity.</u>"</p>
AM13	S95*	18	3.12	<p>Amend reference in paragraph 3.12 as follows:</p> <p>"Evidence Paper 6: Flood Risk and Surface Water Management" (Flood Risk and Surface Water Management <del>interim Evidence Paper December 2014</del> <u>July 2015</u>)</p>
AM14	S10	21	4.4	<p>Amend first sentence as follows:</p> <p>"<del>The</del> <u>Housing</u> commitments at <del>April 2014</del> form part of the development strategy for Chippenham as it is assumed the housing arising from the commitments will be built within the plan period and will ensure the overall scale of growth proposed in the core strategy is achieved."</p>
AM15	S11	21	4.5	<p>Amend paragraph 4.5 as follows:</p> <p>"This site for 750 homes and 2.7 hectares of employment land (12/00560/OUT) <del>was approved subject to the signing of a section 106 agreement in April 2014. The final determination of the planning application and future applications on the site will be made in accordance with the relevant policies within the Wiltshire Core Strategy as</del></p>

				<p>well as the infrastructure requirements for Chippenham as a whole, as identified within the Chippenham Site Allocations Plan and the Infrastructure Delivery Plan. This site will deliver:"</p> <ul style="list-style-type: none"> <li>• A link road between Malmesbury Road (A350) and Maud Heath Causeway which will become the first section of an eastern link road through to the A4</li> <li>• Provision for the long term protection and management of Birds Marsh Wood</li> <li>• <del>Land for a one form entry primary school</del></li> <li>• <del>Contributions to include:</del> Public open space, leisure provision, highway improvements and education <del>contributions.</del>"</li> </ul>								
AM16	S116	21	Footnote 31	<p>Amend footnote 31 as follows:</p> <p>"Housing Land Supply Statement, <del>April 2015</del> <u>April 2014</u>, published <del>September 2015</del> <u>July 2014</u>"</p>								
AM17	S12	22	4.6	<p>Amend paragraph 4.6 as follows</p> <p>"This site will deliver:</p> <ul style="list-style-type: none"> <li>• Off-site highways works including to Pheasant roundabout;</li> <li>• Provision of new bus to allow dedicated service to run through the site;</li> <li>• <del>The delivery of land for a primary school;</del></li> <li>• New Hill Top Park of 4.5 hectares;</li> <li>• <del>Contributions to include:</del> Public open space, leisure provision, highway improvements and education <del>contributions.</del>"</li> </ul>								
AM18	S13	22	Table 4.1	<p>Amend table 4.1 as follows:</p> <p>Table 4.1 Chippenham Housing Land Supply at April <del>2014</del><u>2016</u></p> <table border="1"> <thead> <tr> <th>Core Strategy Requirement</th> <th>Completions 2006- <del>2014</del> <u>2016</u></th> <th>Commitments April <del>2014</del> <u>2016</u></th> <th>Residual Requirement</th> </tr> </thead> <tbody> <tr> <td>4510</td> <td>995 <u>1135</u></td> <td><del>1580</del> <u>1715</u></td> <td><del>1935</del> <u>1661</u></td> </tr> </tbody> </table> <p>Source: Wiltshire Housing Land Supply Statement April <del>2014</del> <u>2016</u> (<del>July 2014</del><u>September 2016</u>).</p>	Core Strategy Requirement	Completions 2006- <del>2014</del> <u>2016</u>	Commitments April <del>2014</del> <u>2016</u>	Residual Requirement	4510	995 <u>1135</u>	<del>1580</del> <u>1715</u>	<del>1935</del> <u>1661</u>
Core Strategy Requirement	Completions 2006- <del>2014</del> <u>2016</u>	Commitments April <del>2014</del> <u>2016</u>	Residual Requirement									
4510	995 <u>1135</u>	<del>1580</del> <u>1715</u>	<del>1935</del> <u>1661</u>									

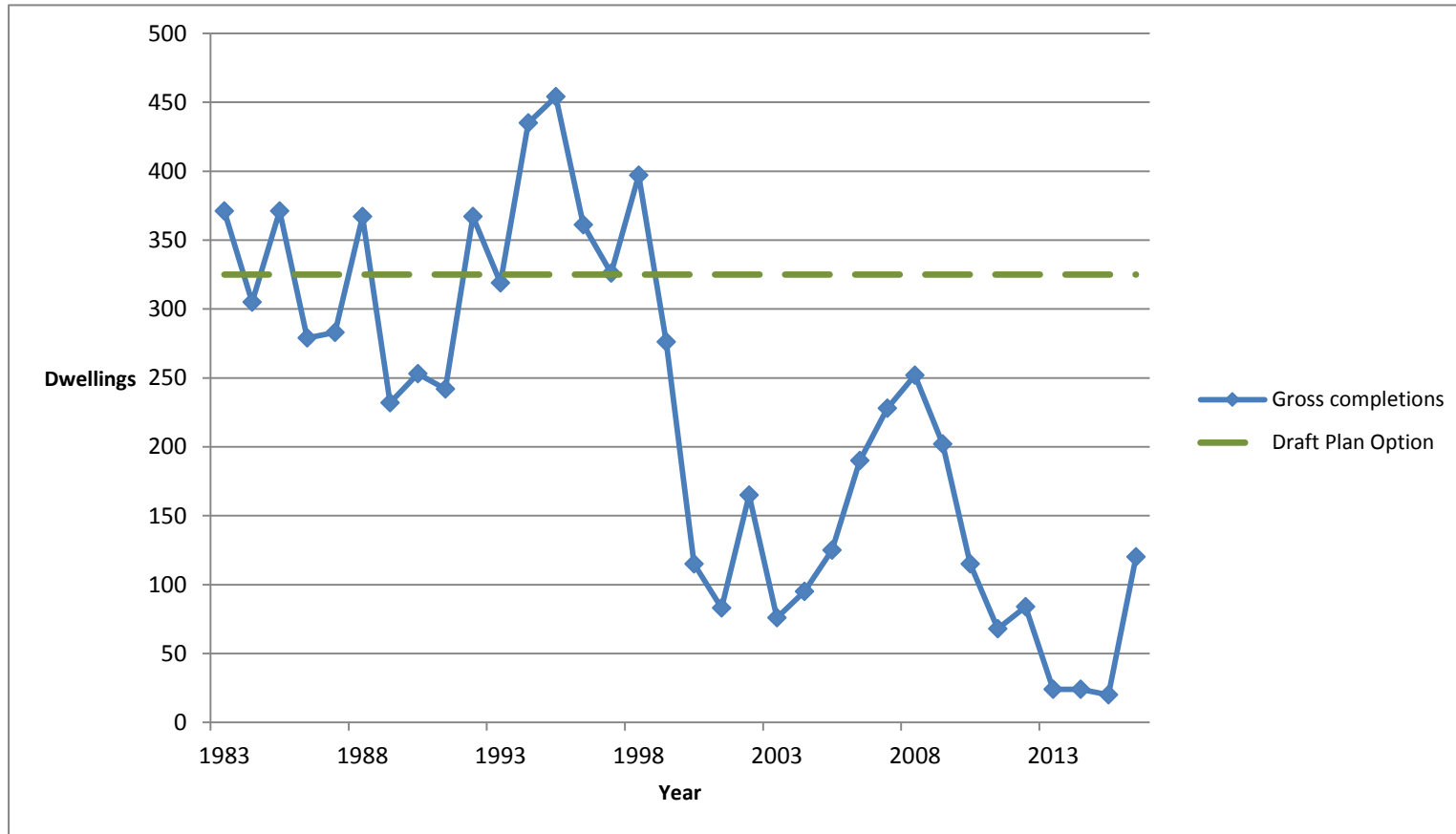
AM19	S14	22	Table 4.2	Amend table 4.2 as follows: Table 4.2 Chippenham Employment Land Supply at April <del>2014</del> <u>2016</u>								
				<table border="1"> <thead> <tr> <th>Core Strategy Requirement</th> <th>Completions 2006-2014 <u>2016</u></th> <th>Commitments April <del>2014</del> <u>2016</u></th> <th>Residual Requirement</th> </tr> </thead> <tbody> <tr> <td>26.5ha</td> <td>0ha</td> <td>5.0ha</td> <td>21.5ha</td> </tr> </tbody> </table>	Core Strategy Requirement	Completions 2006-2014 <u>2016</u>	Commitments April <del>2014</del> <u>2016</u>	Residual Requirement	26.5ha	0ha	5.0ha	21.5ha
Core Strategy Requirement	Completions 2006-2014 <u>2016</u>	Commitments April <del>2014</del> <u>2016</u>	Residual Requirement									
26.5ha	0ha	5.0ha	21.5ha									
AM20	S90	22	4.8	Amend reference to paragraph 4.8 as follows:  "The site selection process" (The process and outcomes are explained in full in the Chippenham Site Allocations Plan: Site Selection Report, <del>February 2015</del> <u>May 2016</u> )  Add reference to <u>Evidence Base 7: Heritage Assets</u> to the list at paragraph 4.8								
AM21	S29	31	Footnote	New footnote  " <u>Policies CF2 and CF3 North Wiltshire Local Plan 2011-Adopted June 2006 are set to be replaced by a new policy resulting from a partial review of the Wiltshire Core Strategy.</u> "								
AM22	S45	40	CH4	Amend first sentence of policy CH4 as follows:  "Land adjacent to and relating to the River Avon running through the allocations at South West Chippenham <u>and</u> Rawlings Green <del>and East Chippenham</del> will be developed for use as country parks, to include the following uses."								
AM23	S46	40	5.32	Amend penultimate sentence of paragraph 5.32 as follows:  "A key role will also be for these areas to provide improvements to the rights of way network through introducing new green corridors., <del>especially to and from the town centre but also other destinations like Abbeyfield School.</del> "								
AM24		40	5.33	Add footnote to 5.33 as follows:								



				Further work is being undertaken to develop the ownership, governance and detailed management of the Country Parks <u>(1)</u> . <u>“(1) Chippenham Riverside Country Park Future Management Draft Report by Natural England and Wiltshire Council, May 2016”</u>
AM25	S49	41	Figure 6.1	Amend Figure 6.1 as shown in appendix 1 to include latest monitoring information.

Appendix 1

AM25 Amend Figure 6.1 to include latest monitoring information.



**Wiltshire Council**

**Cabinet**

**14 March 2017**

---

**Subject: A303 Amesbury to Berwick Down Road Scheme**

**Cabinet Member: Cllr Fleur de Rhé-Philippe**

**Key Decision: Yes**

---

## **Executive Summary**

The single carriageway section of A303 between Amesbury and Berwick Down can no longer accommodate the traffic at peak hours. This has an adverse impact on safety, local economy, local communities, and the World Heritage Site (WHS). The Council has been encouraging government to improve this road, and therefore now welcomes the proposal from Highways England to bring substantial improvements to A303 by building a dual carriageway and a tunnel.

Following a three stage options appraisal of the approximately 60 historic routes for the dualling of the Amesbury to Berwick Down section of the A303, Highways England have identified two routes as the better performing and more deliverable options for this road improvement scheme. These are:

- Route option D061 – 2.9km length tunnel with route running north of Winterbourne Stoke, the eastern tunnel portal located east of The Avenue and the western tunnel portal located west of Normanton Gorse
- Route option D062 – 2.9km length tunnel with route running south of Winterbourne Stoke, the eastern tunnel portal located east of The Avenue and the western tunnel portal located west of Normanton Gorse

Both options would include improvements for the existing junctions between the A303 and the intersecting A345 and A360.

A public consultation was launched by Highways England on 12<sup>th</sup> January and will run until 5<sup>th</sup> March 2017, for public and key stakeholders to comment on their proposals and identify any areas of concern or opportunities for further improvement.

Council officers from a variety of technical services have reviewed the public consultation material and their analysis is collated within Appendix 1. This is intended to be submitted to Highways England as the Council's formal response to the consultation.

Subject to the successful resolution of the issues identified within the main body of this report and in Appendix 1, it is recommended that the proposed routes for the scheme are supported. Where there is a preference in relation to options for the section at Winterbourne Stoke, this is included under various headings in

Appendix 1. Whilst it is recognised that the design proposals are still at a very early stage in the development process, it is necessary for further information to be made available to the Council in order for it to fully assess the proposals. Therefore, the Council should retain the ability to refine its position once the additional information is available.

## **Proposals**

Members are asked to:

- Note the contents of this report
- Agree the proposed response to Highways England for this options appraisal and route selection public consultation
- Note the additional potential financial implications arising as a result of this scheme, which will require more detailed discussion as the preferred route is established.

## **Reason for Proposals**

The case for dualling the A303 between Amesbury and Berwick Down has long been established through promoting economic growth in the South West, increasing safety, improving connectivity with neighbouring regions and protecting and enhancing the environment

Highways England have assessed approximately 60 historic routes and identified the 2.9km tunnel with a bypass either North or South of Winterbourne Stoke as the better performing and more deliverable route. Whilst there are several issues which will require resolution as the design is further developed, on the whole officers believe that both options are capable of addressing the transport, economic, heritage and community issues associated with the A303. They will also enable the timeframe dictated by the Development Consent Order (DCO) process to be met, achieving start on site by March 2020.

**Dr Carlton Brand (Corporate Director)**

## **Wiltshire Council**

### **Cabinet**

**14 March 2017**

---

**Subject: A303 Amesbury to Berwick Down Road Scheme**

**Cabinet Member: Cllr Fleur de Rhé-Philippe**

**Key Decision: Yes**

---

### **Purpose of Report**

1. To inform Members of the route options appraisal methodology and outcome selected by Highways England to take to public consultation
2. To confirm the Council's response to the public consultation
3. To note the resource and financial implications for the Council with regard to this road improvement scheme

### **Relevance to the Council's Business Plan**

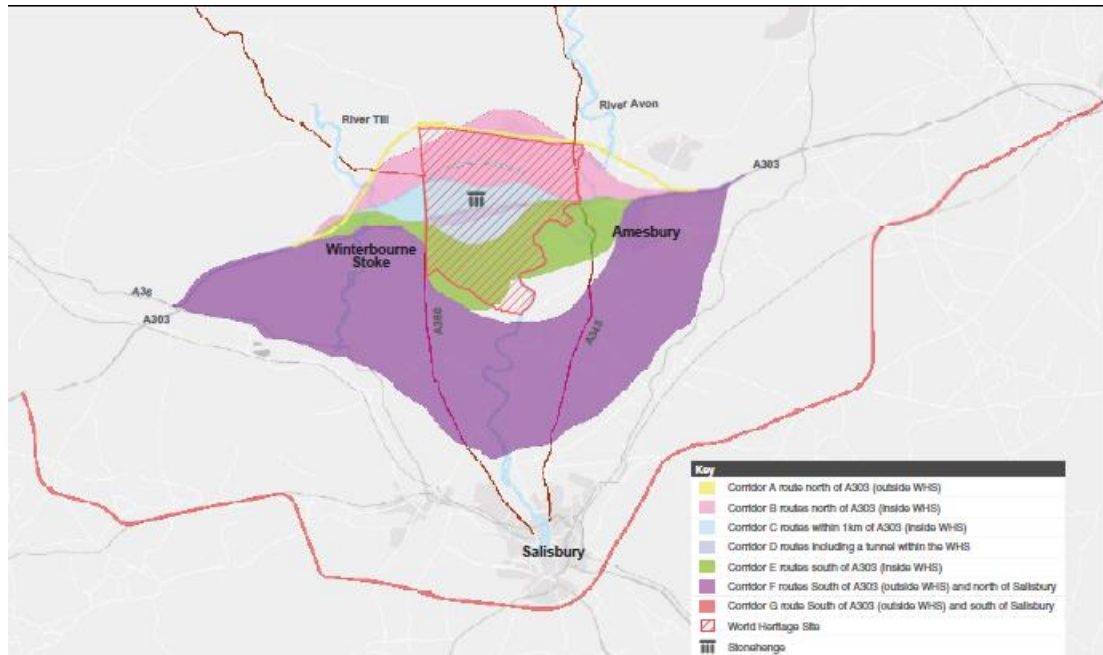
4. Improvements along the A303 help meet the priorities of the Council's Business Plan, including:
  - Outcome 1 – Wiltshire has a thriving and growing local economy
  - Outcome 2 – People in Wiltshire work together to solve problems locally and participate in decisions that affect them
  - Outcome 3 – Everyone in Wiltshire lives in a high quality environment
  - Outcomes 6 – People are as protected from harm as possible and feel safe

### **Main Considerations for the Council**

5. During the past year, Highways England have been assessing all potential routes for dualling the A303 between Amesbury and Berwick Down. Approximately 60 routes had historically been proposed by Government, stakeholders and the public. These options were grouped into 8 corridors which contained route options with similar characteristics as follows:
  - Corridor A – Surface routes north of the existing A303 (wholly outside WHS)
  - Corridor B – Surface routes north of the existing A303 (partially inside WHS)
  - Corridor C – Surface routes within 1.0km of the existing A303 (as the route options pass through the WHS)
  - Corridor D – Routes including a tunnel (at least partially within the WHS)
  - Corridor E – Surface routes south of the existing A303 (at least partially inside WHS)

- Corridor F (North) – Surface routes south of the existing A303 (wholly outside WHS) and north of Salisbury
- Corridor F (South) – Surface routes south of the existing A303 (wholly outside WHS) and north of Salisbury, further south than Corridor F (North)
- Corridor G – Surface routes south of the existing A303 (wholly outside WHS) and south of Salisbury.

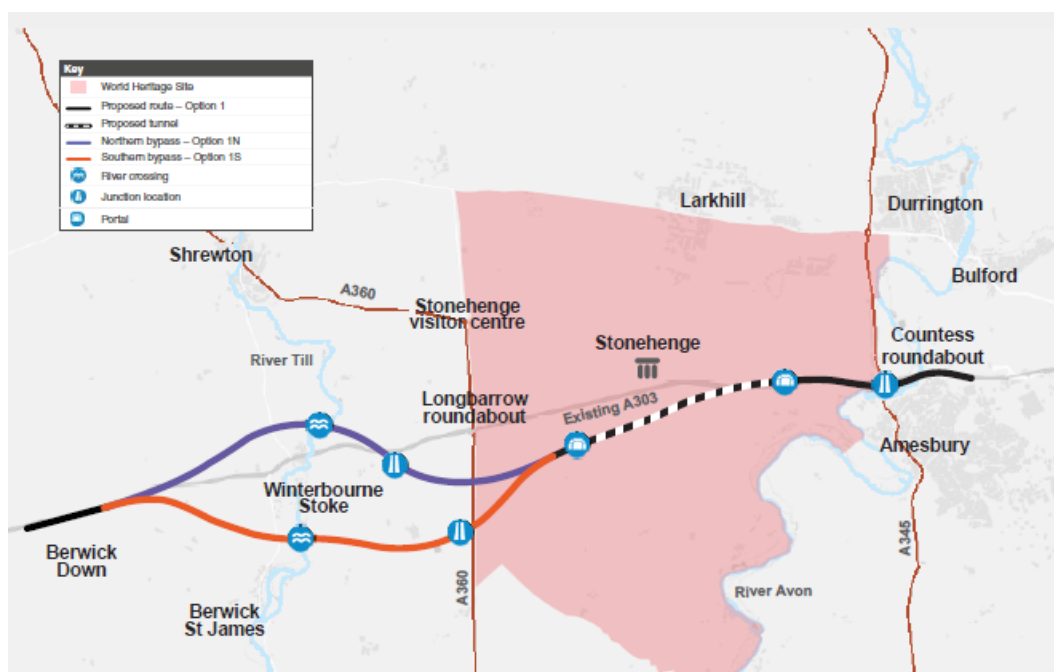
These are shown diagrammatically below:



6. These corridors were assessed against three criteria, being the Client Scheme Requirements (CSRs), the Web-based Transport Appraisal Guidance's (WebTAG) Early Assessment and Sifting Tool (EAST) and the National Policy Statement for National Networks (NPSNN) environmental aspects. Following this initial assessment, Corridor D, Corridor F (North) and Corridor F (South) were taken forward for further consideration.
7. Four routes within Corridor D and three routes within Corridor F (North and South) were assessed against the Options Assessment Framework contained within the WebTAG Transport Appraisal Process, which is based around the Transport Business Case Five Case Model criteria. Primary considerations at this stage were the Strategic Fit assessment (fit with policy and CSRs) and the Value for Money assessment which includes the impact on the economy and the environment. As a result, three routes (two in Corridor D and one in Corridor F) were identified as the better performing routes.
8. Further analysis of these three routes was undertaken which included assessment of the following areas: traffic and journey times, scheme costs, economic, social impact, safety, operational, technology and maintenance, environmental, programme compliance and the Client Scheme Requirements (CSRs).

9. Two route options within Corridor D were selected for public consultation to further develop the design and undertake further appraisal to determine the preferred route for the scheme. These are:
  - Route Option D061 – 2.9km length tunnel with route running north of Winterbourne Stoke, the eastern tunnel portal located east of The Avenue and the western tunnel portal located west of Normanton Gorse
  - Route Option D062 – 2.9km length tunnel with route running south of Winterbourne Stoke, the eastern tunnel portal located east of The Avenue and the western tunnel portal located west of Normanton Gorse.

The proposal is illustrated diagrammatically below:



10. The public consultation was launched on 12<sup>th</sup> January and ran until 5<sup>th</sup> March 2017. All consultation material is available from the Highways England website (<https://highwaysengland.citizenspace.com/cip/a303-stonehenge/>), with the full suite of hard copy documents available in 3 Council libraries for review and feedback forms available from a further 14 libraries. Highways England have also held 10 public exhibition events in the surrounding locality, including one in London. Promotional activity has appeared on the national and local news television programmes, in newspapers and journals, on the radio, through social media, in local amenity locations such as food stores and local schools, and in service stations along the M4 and M5 corridor.
11. Highways England have asked the public and key stakeholders for views on the proposed route and junctions, any perceived issues to be considered, and any opportunities for legacy improvements resulting from this scheme.
12. Council officers from a variety of technical services have been reviewing the consultation material to identify any concerns or opportunities and any

further information required. These have been collated in Appendix 1, which is intended to be submitted to Highways England as the Council's formal response to the consultation.

13. The key issues identified by officers include:

Highways and Transport:

- Impact of the scheme on the local road network, including any Traffic Regulation Orders (TROs) to regulate use of the former A303, and agreement under s59 highways Act 1980 in relation to non-A303 haul routes
- Design of local road elements of the scheme, including appropriate alterations of junctions as appropriate
- Surface water drainage
- Rights of way and access, including segregated crossings
- De-trunking and transfer of former Highways England assets to Wiltshire Council
- Improvements to and signing for tunnel and route diversions
- Requirements for local TROs

Public Health and Public Protection:

- Impact of noise and vibration from both the construction of the road and tunnel, and its operation on local residents
- Protection of private water supplies and associated hydrology and land drainage
- Construction impact and long term traffic related pollution at residential properties
- Dust impacts arising from construction phase, particularly during the summer months
- Impact of artificial lighting during the construction phase

Ecology:

- Effects on a number of European nature conservation designations which require detailed assessment and mitigation
- Presence of phosphatic chalk geology in the general area which the tunnel will pass through and its disposal or re-use
- Impact of Winterbourne Stoke bypass on River Till and Parsonage Down NNR / SAC
- Impacts on locally important County Wildlife Sites, priority habitats and protected / priority / notable species.
- Opportunities for ecological enhancement to be sought where possible

Landscape:

- Community and landscape severance of southern bypass route for Winterbourne Stoke
- Adoption of sufficient acoustic and visual mitigation methods for affected communities

Public Rights of Way (PROWs):



Retention and supplementation of the existing public rights of way network (subject to point 4 below) to enable walkers, cyclists, horse riders and carriage drivers a legal right of access through the WHS. This would include:

- New or existing east-west routes to connect with north-south public rights of way to ensure that continuous access is available. These to include a connection between byways open to all traffic Amesbury 11 and 12 in order to retain through access for mechanically propelled vehicles between Larkhill and Lake
- Connectivity where the rights of way would cross the new A303 route
- Consider the opportunities provided by public rights of way for people with disabilities to explore the landscape in sustainable ways – e.g. riding for the disabled, mobility buggies – and the need and cost of appropriate maintenance to facilitate their access
- Appropriate Public Path Orders where alterations would be beneficial to path users

#### Archaeology:

- The Eastern portal location and design are developed to minimise proximity and visual impact on the Avenue and King Barrow Ridge
- The design and location of the Western portal, expressway and junctions are developed/amended to avoid the current predicted major adverse impact on heritage and Outstanding Universal Value especially in relation to the Scheduled Barrow Groups and other attributes of Outstanding Universal Value
- The expressway and junction alignments do not adversely impact on Solstitial alignments
- On present evidence, the southern bypass routes appears to be preferable to the northern one, although there is still much more evaluation and assessment needed on the southern route
- All required archaeological evaluation within and outside WHS is completed in time to feed into the assessment work prior to route approval and submission of the DCO. This work should be done in time to help inform the preferred route decision and the detailed design of the Scheme
- Mitigation measures will be in place to offset potential adverse impact on Outstanding Universal Value and other significant heritage assets.

#### Built Heritage:

- Significant impact on Countess Farm, comprising six grade II listed buildings, from proposed flyover at Countess Roundabout
- 'Less than substantial harm' to grade II listed stone bridge over the Avon and Diana's House, a grade II\* listed former lodge to the Abbey
- Access to A303 using Stonehenge Road from the upper Woodford valley will need to be considered
- The potential increase in noise levels affecting the Winterbourne Stoke Conservation Area will need to be monitored, with appropriate mitigation through surfacing materials and detail of cuttings and embankments

- In the event that the Southern Bypass route was selected, the significance of 'The Park' should be explored. The introduction of a dual-carriageway across the open landscape of the river valley between the Winterbourne Stoke and Berwick St James Conservation Areas would have a significant adverse visual and aural impact on both and several listed buildings. Consideration should also be given to noise impacts on Asserton Farm. The tranquil rural setting of an unlisted thatched cottage (C19 or earlier) lying to the south of the bridge would be severely compromised
  - Both bypass options would offer significant improvement to the setting of the grade II\* listed Manor House, Winterbourne Stoke.
14. Subject to successful resolution of the issues identified above and in Appendix 1, on the whole officers recommend that the proposed routes for the A303 Amesbury to Berwick Down scheme are supported. Where there is a preference in relation to options for the section at Winterbourne Stoke, this is included under various headings at Appendix 1.
  15. However, whilst it is recognised that the design proposals are still at a very early stage in the development process, it is necessary for further information to be made available to the Council in order for it to fully assess the proposals.

## **Background**

16. Dualling the A303 and A358 is a nationally significant infrastructure project (NSIP) as defined by the Planning Act 2008.
17. This NSIP will be promoted by Highways England under the requirements of the Planning Act to secure a Development Consent Order (DCO) to allow work to begin. This process will involve detailed engagement with the general public, local communities and stakeholders.
18. The DCO process and the role of Local Authorities within this process was the subject of a previous Cabinet report on 15 March 2016 ([Cabinet Papers Item 39](#)).
19. The timetable for the development of this road improvement scheme, the Council's involvement and governance arrangements established to fully engage and manage this project, and the estimated resource implications for the various professional areas were detailed in a Cabinet report considered on 11 October 2016 ([Cabinet Papers Item 118](#)).

## **Overview and Scrutiny Engagement**

20. Whilst no specific Overview and Scrutiny activity has been undertaken to date, quarterly Stakeholder Engagement Meetings are being held to ensure that local Members are involved in the development of this road scheme.
21. Presentations are also being delivered at the relevant Area Board meetings in Amesbury, Mere and Warminster when requested by the Chair.

22. Furthermore, the Community Area Managers are employing the model used in the Army Rebasing Programme for communication and engagement. The Community Area Manager for Amesbury is co-ordinating all activity with the other Community Area Manager's across Wiltshire.

### **Safeguarding Implications**

23. None

### **Public Health and Public Protection Implications**

24. A key outcome of the scheme is to improve safety along the corridor. By creating an "expressway" dual carriageway, which is designed to high safety standards, it will increase capacity on the route, which will reduce the accident prevalence.
25. Furthermore, there are a number of issues which will need to be addressed to minimise the impact that the construction and operational phases of the scheme may have on the local area in terms of environmental health. This would include noise and vibration, air quality, dust control and light nuisance. Further detail is required to fully assess any proposed mitigating measures to minimise the impact of the scheme. It is expected that this will be available during the development of the DCO application and in advance of the statutory consultation planned for the end of 2017.

### **Procurement Implications**

26. None

### **Equalities Impact of the Proposal**

27. Council officers have engaged with Highways England's appointed consultants to ensure the consultation is adequately promoted within local communities, including any identified hard to reach groups.
28. Whilst some analysis of the social impact has been undertaken to date, a full equality impact assessment will be undertaken by Highways England as part of the DCO process.
29. Equality impact considerations will also be referenced within the Council's report on the appropriateness of the consultation, which is required to be submitted to the Planning Inspectorate following the DCO submission.

### **Environmental and Climate Change Considerations**

30. As a signatory to the World Heritage Site (WHS) Management Plan (2015) and a member of the WHS Partnership Panel, the Council and its partners have a responsibility to protect the outstanding universal value of the site and any decisions relating to this will be monitored by UNESCO. A second mission by ICOMOS / UNESCO was held between 31<sup>st</sup> January and 3<sup>rd</sup> February 2017.

31. A preliminary assessment of the implications for heritage, archaeology and ecology of the proposed route has been undertaken and is included as part of Appendix 1. However, further information is required in order for the Council to fully assess the implications and as such we will continue to work with Highways England and other key stakeholders to undertake this.
32. Whilst it is anticipated that the scheme will provide benefits through improved traffic flows, thereby reducing delays and a consequential reduction in noise and excessive fuel consumption and emissions associated with slow moving or stationary traffic, further information is required to confirm this.

### **Risk Assessment**

33. It is anticipated that engagement in this project will be controversial and it is likely that there will be conflicting views amongst the service areas involved and by Members. The Council will be required to formulate a corporate position on many of the issues considered and it is anticipated that this will be set by Cabinet following recommendations from officers.
34. Whilst these proposals are being developed, the Council may need to reserve judgement on some matters until further information is available in order for the Council to make a fully informed decision on certain key aspects.

### **Risks that may arise if the proposed decision and related work is not taken**

35. The DCO submission may be delayed which may jeopardise the current central government funding agreement.

### **Risks that may arise if the proposed decision is taken and actions that will be taken to manage these risks**

36. The Council will continue to work closely with Highways England and other key stakeholders to manage the inputs required for the DCO submission.
37. Members will be regularly updated and agreement sought at each of the key stages of the DCO process.

### **Financial Implications**

38. An indicative figure of £300,000 has been included in 2017/18 in the Medium Term Financial Strategy (MTFS) as part of budget setting to cover the additional resource requirements. Highways England have now indicated that resource expenditure may not be recovered, however Wiltshire Council are continuing to challenge this.
39. Appendix 2 of the October 2016 Cabinet report shows an initial assessment of the additional resource requirements for this programme before any potential recovery of costs from Highways England.

40. The Council will have additional resource implications for the period post consent whilst the scheme is being delivered, if applicable. These will be identified in a future report to Cabinet.
41. As outlined in the main body of the report, both options being consulted on will have future financial implications in terms of maintenance and running costs as a result of the de-trunking of the A303 as part of the DCO process. Initial assessment is that Wiltshire Council would take on a stretch of new road, a junction and a roundabout, which may include new traffic signals and street lighting. Historically when roads have been de-trunked, Highways England have compensated Local Authorities for the additional maintenance burden the roads would present. At this stage future financial implications cannot be quantified. This would be done later in the DCO process.

### **Legal Implications**

42. Section 22 of the Planning Act 2008 sets out criteria for Highway schemes to be considered as nationally significant infrastructure projects and therefore capable of being dealt with under the Development Consent Order (DCO) process.
43. This process was introduced with an aim that it would be a one stop shop for any significant infrastructure project (including some processes which normally the Council may have been the decision maker). The Stonehenge project falls into this category.
44. It is Highways England who will be the lead body in any application for a DCO.
45. The role of the Council within this process is as a statutory Consultee (and one of the principal consultees). It is inevitable that there will be a number of Council facets that will be engaged.
46. We are currently at the pre-application stage whereby Highways England are seeking at an early stage comments on a 1.8 mile (2.9 kilometer) tunnel under part of the World Heritage Site (WHS), a bypass for Winterbourne Stoke and improve the existing junctions between the A303 and the intersecting A345 and A360.
47. As part of the consultation documents they have included a technical appraisal report setting out the background to the proposals. Part of that appraisal considered options which took the A303 outside the world heritage site completely (F10).
48. This option scored highly on cultural heritage but less strongly on the other aspects (transport, economic growth and environment and community) and therefore Highways England have identified as their preferred option two options (D061 and D062) which both include the tunnel.

49. It is correct that the design proposals are still at a very early stage in the development process, it is necessary for further information to be made available to the Council in order for it to fully assess the proposals. Therefore, the Council should retain the ability to refine its position once the additional information is available.
50. However for the purposes of the pre-application consultation stage Legal Services are satisfied that the draft report fairly and professionally reflects the multi facets that the Council are involved with in this proposal.

### **Options Considered**

51. None

### **Conclusions**

52. The case for dualling the A303 between Amesbury and Berwick Down has long been established through promoting economic growth in the South West, increasing safety, improving connectivity with neighbouring regions and protecting and enhancing the environment.
53. Highways England have undertaken an option appraisal of approximately 60 historical routes and identified a 2.9-kilometre tunnel under part of the World Heritage Site, a bypass for Winterbourne Stoke (either to the North or to the South), and improvements for the existing junctions between the A303 and the intersecting A345 and A360 as the better performing and more deliverable option.
54. Following assessment of the proposals by Council officers, it is recommended that support is given to Highways England to develop a preferred route and address the identified issues contained above and in Appendix 1. However, whilst it is recognised that the design proposals are still at a very early stage, the Council must retain the ability to refine its position once the additional information is available.
55. Members are asked to:
- Note the contents of this report
  - Agree the proposed response to Highways England for this options appraisal and route selection public consultation
  - Note the additional potential financial implications arising as a result of this scheme, which will require more detailed discussion as the preferred route is established.

**Dr Carlton Brand (Corporate Director)**

---

Date of report: 23<sup>rd</sup> February 2017

## **Appendices**

Appendix 1 – Wiltshire Council Non-Statutory Consultation Response to Highways England for A303 Amesbury to Berwick Down (Stonehenge) Road Improvement Scheme

### **Background Papers**

The following documents have been relied on in the preparation of this report:  
None

This page is intentionally left blank



## Appendix 1

### A303 Non-Statutory Public Consultation Response by Wiltshire Council

#### Contents of Paper:

I.	Introduction and Context	1
II.	Consideration of Strategic Objectives	1
III.	Highways and Transport Considerations	6
IV.	Public Health and Public Protection Considerations	11
V.	Ecology Considerations	11
VI.	Landscape Considerations	12
VII.	Public Rights of Way (PROWs) Considerations	13
VIII.	Archaeology and World Heritage Site Considerations	14
IX.	Built Heritage Considerations	20
X.	Flood Risk and Drainage Considerations	22
XI.	Procedural Issues and Next Steps	22

#### I. Introduction and Context

1. The proposal the subject of this consultation raises many considerations for the Council, which can be summarised into two key questions:
  - Does the proposal accord with the strategy for this area of Wiltshire as set out in the Wiltshire Core Strategy?
  - What are the technical issues raised by the proposal and what, if any, mitigation should be required as a consequence of any potential impacts?
2. The first consideration is to consider how the proposals help deliver the Council's strategic objectives as set out in the Core Strategy. Secondly, consideration of the specific impacts that a scheme of this scale may have on the environment and if it is possible to mitigate them.

#### II. Consideration of Strategic Objectives

##### Economic Considerations

3. The Wiltshire Core Strategy is an economy-led strategy, which unequivocally places an emphasis on economic growth as the driving force behind meeting its objectives. The underpinning idea of the strategy is to strengthen communities, wherever possible,

by maintaining and increasing the supply of jobs to ensure that Wiltshire remains strong and prosperous.

4. In strategic planning terms, Wiltshire faces a number of challenges, of which reducing levels of out-commuting from many of the county's settlements is a significant one. Evidence suggests that lack of local job opportunities and pay differentials are a major driver meaning that higher earners commute out of the county to work. To address this, the self-containment of the main settlements needs to be improved to ensure that there are a wide range of appropriate employment opportunities available, reflecting the needs of inward investors and Wiltshire's communities. Delivering a good level of local employment opportunities close to the main centres of population will help reduce the need to commute out of Wiltshire to seek work. Broadening the employment base and providing choice in the job market for Wiltshire's population is a key element of delivering resilient communities.
5. Strategic Objective 1: "Delivering a thriving economy" makes clear that *"Wiltshire needs to encourage a buoyant and resilient local economy. The Core Strategy enables development to take place and encourages economic vitality, providing local jobs for Wiltshire's population, whilst ensuring that sustainable development objectives have been met....."*
6. The wider strategy of the Wiltshire Core Strategy, is to accelerate the transition toward high value and innovative local jobs to offset the traditional declining sectors such as financial services. One of the key outcomes of the Strategic Objective 1 is that Wiltshire will have secured sustainable growth of established and emerging employment sectors, building on existing strengths, including defence-related employment, bioscience, advanced manufacturing and business services.
7. A significant part of the proposal falls within the Amesbury Community Area. The Core Strategy vision for Amesbury includes that Amesbury will have good levels of employment, including the specialist sectors within the MoD, QinetiQ at Boscombe Down and the scientific research at Porton Down.
8. Core Policy 4 identifies the Boscombe Down site in this community area as a Principal Employment Area as well as allocating 7 ha of employment land on the site. Core Policy 35 states that Wiltshire's Principal Employment Areas should be retained for employment purposes within use classes B1, B2 and B8 to safeguard their contribution to the Wiltshire economy and the role and function of individual towns. Proposals for renewal and intensification of the above employment uses within these areas will be supported.
9. Core Policy 37 relates to Military establishments, of which Boscombe Down is one. This policy offers support for new development at such operational facilities that help enhance or sustain their operational capacity.
10. Core Policy 4 also allocates 10 ha of employment land at Porton Down in the Amesbury community area, where the establishment of a private sector science park is currently ongoing.
11. There is therefore already a significant cluster of excellence centred on scientific defence, research and development operating in this community area and using them as leverage to attract synergistic inward investment is a key objective of the Wiltshire Core Strategy.

12. The area strategy for the Amesbury community area lists specific issues that need to be addressed in planning for this area. It recognises that the A303 corridor runs through the area and is a main arterial route from London to the south west. It suffers from problems, with intermittent stretches of single lane carriageway causing large delays at peak times. This has a knock-on effect on the attractiveness of the area for business and tourism investment.
13. Effective, efficient road links are fundamental to enable businesses to prosper and help to unlock further economic growth. The A303 scheme between Amesbury and Berwick Down will significantly reduce journey times which in turn will cut transport costs, and give businesses in Wiltshire better access to the market, suppliers and skills. Wiltshire's inward investment attractiveness will also be strengthened and the creation of an expressway will improve accessibility between businesses and their customers. The scheme will also help to link people with jobs and provide better access towards higher value, local jobs which in turn will contribute towards reducing out-commuting from Wiltshire.
14. At a regional level, the South West region is home to one of the largest concentration of aerospace and defence activities in Europe and the largest cluster in the UK, with its local supply chain supporting 14 of the world's leading aerospace / defence companies. The centre of excellence developing at Boscombe Down and Porton Down is a significant part of this. The A303 scheme will consolidate this position by improving connections between regional business communities, enabling more efficient access to their supply chains as well as providing employees better access to high skilled jobs.

### **Conclusion on Economic Considerations**

15. In principle, therefore, the proposal for the improved road will play a pivotal role in contributing towards the implementation of various key policy and strategy priorities set out in the Core Strategy.
16. The established Plan for job growth and meeting the needs of business are central to the Core Strategy. This plan puts in place policies which will help both attract new inward investment and help existing business meet their aspirations in Wiltshire, as well as providing the right environment for business start-ups. The A303 scheme will remove a potential barrier to investment, improve connectivity between businesses and their customers, and provide employees with greater access to higher value jobs.

### **Tourism Considerations**

17. Tourism plays a significant part in the economic health of Wiltshire and is worth over £779 million a year. Wiltshire has a wealth of natural and heritage assets which attract visitors from home and abroad that range from one of the world's most famous and recognisable monuments, Stonehenge, to renowned attractions such as Longleat Safari and Adventure Park to country houses, museums and gardens. Rural countryside within the AONBs, Wiltshire's canal network, historic villages such as Lacock and farm and animal attractions also draw visitors to the area. Wiltshire is also well placed for visiting attractions such as the New Forest National Park, the Cotswolds, Bath Spa and the major resorts and beaches at Bournemouth and Poole. Wiltshire's built and natural environment is a key part of the tourism product and the future success of the area's tourism industry is, in many ways, dependent on the effective management and conservation of the environment.
18. The Spatial Vision of the Core Strategy states that by 2016, Wiltshire's heritage will have been a major driver used to promote tourism for economic benefit.

19. Strategic Objective 1 “Delivering a thriving economy” recognises that the potential of tourism should be realised as a major growth sector through capitalising on the quality of the environment and location Wiltshire benefits from. The Core Strategy identifies that one of the key outcomes of this objective will be that Wiltshire’s tourism sector will have grown in a sustainable way, ensuring the protection and where possible enhancement of Wiltshire’s environmental and heritage assets.
20. The Core Strategy recognises that World Heritage Site (WHS) status offers the potential of considerable social and economic gains for Wiltshire in areas such as sustainable tourism, but that this will require careful and sensitive management in order to protect the WHS and sustain its OUV (para 6.144). Large numbers of overseas visitors, as well as domestic tourists consider Stonehenge a “must-see” attraction. However, there is a lack of capital made on this unique opportunity locally. The A303 scheme will reconnect Stonehenge with the rest of the WHS lying to the south of the A303, give the public greater access to the wider prehistoric landscape and improve the setting of the WHS, all of which will boost tourism in Wiltshire.
21. By upgrading the A303, improving journey times and accessibility to Wiltshire will help to boost tourism, increasing visitor expenditure, making Wiltshire more accessible to tourists, and potentially providing opportunities to promote Wiltshire’s strengths as a short break destination.

### **Conclusion on Tourism Considerations**

22. The A303 scheme will have a twofold impact on tourism in Wiltshire. First, it will improve the setting of the WHS and access to the wider prehistoric landscape (see section below); second it will improve the accessibility of Wiltshire as a whole to tourists. This boost to tourism will clearly then have positive impacts on the economy of the county, and aligns very closely therefore with the economy-led Core Strategy.

### **Environmental Considerations**

23. Wiltshire’s World Heritage Site (WHS) is a designated heritage asset of the highest international and national significance, and consists of two areas of approximately 25 sq km centred on Stonehenge and Avebury. It is internationally important for its complexes of outstanding prehistoric monuments. The setting of the WHS beyond its designated boundary also requires protection as inappropriate development here can have an adverse impact on the site and its attributes of Outstanding Universal Value (OUV).
24. The Spatial Vision of the Core Strategy writes that by 2026 (the end of the plan period), Wiltshire’s important natural, built and historic environment will have been safeguarded. Strategic Objective 5 seeks to protect and enhance the natural, historic and built environment and as part of this, the Stonehenge and Avebury World Heritage Site will be protected from inappropriate development and controlled in a way which sustains its OUV. One of the key outcomes for Strategic Objective 5 is that the WHS and its setting will have been protected from inappropriate development in order to sustain its OUV.
25. The area strategy for the Amesbury community area states that one of the specific issues to be addressed in this area relates to future improvements to the A303 and that the council will continue to work with partners to ensure that any future improvements to the A303 do not compromise the WHS.

26. Core Policy 58 aims to ensure that Wiltshire's important monuments, sites and landscapes and areas of historic and built heritage significance are protected and enhanced in order that they continue to make an important contribution to Wiltshire's environment and quality of life. Development should protect, conserve and where possible enhance the historic environment.
27. Core Policy 59 states that to sustain the OUV of the WHS opportunities will be sought that support the positive management of the WHS through development that, inter alia, reduces the negative impacts of road, traffic and visitor pressure.
28. Core Policy 6 also seeks to protect Stonehenge and its setting so as to sustain its OUV. It explains that new visitor facilities will be supported where they:
  - Return Stonehenge to a more respectful setting befitting its World Heritage Status;
  - Include measures to mitigate the negative impacts of the road.
29. Therefore it was always the case that the advent of the new visitor centre was only part of the overall vision and that reducing impact of the roads was critical.
30. The Core Strategy is clear, therefore, that sustaining the OUV of the WHS is a key consideration, and recognises that the A303 currently has a negative impact on the setting of the WHS. Currently, the A303 cuts through the middle of the WHS, and the roar of traffic and headlights are an intrusion on the peace and sanctity of Stonehenge, compromising its integrity and harming the setting of many monuments. The proposed tunnel would reconnect Stonehenge with the two-thirds of the WHS lying to the south of the A303 and currently cut off by it. The tunnel would make the setting of the ancient stone circle more tranquil, give the public greater access to the wider prehistoric landscape and improve the environment for wildlife.
31. However the decision makers in this instance [as a nationally significant infrastructure project, this scheme will be dealt with under the Development Consent Order (DCO)] will need to ensure that the planning balance is addressed in relation to the adopted policy supporting the scheme to upgrade the A303 for the economic benefits and removal of the road from view, against other policies of the plan which seek to ensure that new development does not do significant harm to the OUV of the WHS, ecology, landscape and residents. The Environmental Statement required to accompany the proposal must objectively scrutinise the potential impacts, such as the impacts the construction of the tunnel portals and expressway will have upon the WHS only once this assessment work has been completed and carefully considered can a decision on the planning balance be reached.

### **Conclusion on Environmental Considerations**

32. Reducing the negative impact of the A303 on Stonehenge is a clear objective of the Core Strategy, as well as protecting its setting. The proposal represents an opportunity not only to remove the existing harm that the current A303 has on the WHS, but also to ensure significant benefit to the WHS, as well the natural environment.
33. Clearly, full and detailed Environmental and Heritage Impact Assessments will need to form part of the further work to be undertaken by Highways England, and detailed comments are provided below from specialist sections of Wiltshire Council to inform this work. Therefore while there is strategic support for the proposals in principle, the decision must be made on the application of a balanced judgement through comparing

the benefits that will accrue against the extent of any environmental harm that will occur and how this can or cannot be mitigated.

### III. Highways and Transport Considerations

34. The consultation package includes a [Technical Appraisal Report](#) (TAR) setting out the background to the proposals for the improvement to the Amesbury to Berwick Down section of the A303.
35. Highways England, as the (DCO) developer for the scheme, has identified four Client Scheme Requirements. The first of these is the transport objective which states, in expanded form:
- *The road will be designed to modern standards and, in addition, to perform as an Expressway.*
  - *The design of the road and connections with the local network will address issues of congestion, resilience and reliability. It will reduce risk of traffic diverting onto local roads.*
  - *Road safety will be improved to at least the national average for a road of this type.*
36. The Council was involved in the determination of the Client Scheme Requirements, so it is reasonable to state that they are aligned with the Council's position. Past considerations by the Council have supported the provision of a tunnelled solution on a similar line to that now proposed. The extent of the problems caused for local residents affected by traffic diverting away from the A303 to avoid the regular congestion and delays on the route were highlighted in a report commissioned by the Council<sup>1</sup>. Those findings have been included as evidence in the [TAR](#)

#### Traffic Capacity

37. It is clear from the information supplied in the [TAR](#) that the proposed scheme would provide adequate capacity on the A303 for forecast demand flows to beyond 2051. The benefits of providing adequate capacity immediately addresses the principal issues of concern ('rat-running') to the communities of Amesbury, Larkhill, Durrington and Bulford, by providing a faster route for through traffic than is provided for on any of the alternative routes. The [TAR](#) identifies at Section 10.2 the forecast reductions in traffic flows on the local alternative routes if the scheme should proceed.

#### Route Options

38. The consultation options, identified as Route Option D061 and Route Option D062, share a common route for the eastern section of the scheme, but offer alternative bypass option routes around Winterbourne Stoke; D061 provides for a northern bypass of the village and D062 a southern bypass. In terms of overall performance the [TAR](#) indicates that both options provide very similar transport benefits, and both routes are about 0.4km longer than the existing A303 between either end of the scheme.

#### Junctions

39. The scheme would provide grade separated junctions at the junctions with the two principal roads, the A345 (Countess) and the A360 (Longbarrow).

---

<sup>1</sup> A303 Routeing Study. Atkins Report - 2014

40. The A345 junction was previously designed to accommodate a flyover for the A303 mainline. It is proposed that the junction be lit only at the lower roundabout level. No details are yet available as to the control of the junction, but it is likely that the traffic signals will become redundant.
41. The existing services at Countess will be accessed by way of a new eastbound slip road from the roundabout. The entrance is very close to the roundabout and conspicuity is relatively poor; the Council would wish to be assured that as a slip road, with potentially greater urgency to accelerate to match mainline merge traffic speeds, this access will be appropriately modified and/or signed.
42. The D061 option would have a grade separated junction where the new line crosses the existing A303, with a link eastwards to connect with Longbarrow roundabout and the A360 and an arm connecting via the existing A303 to Winterbourne Stoke.
43. The D062 option provides for a new grade separated junction to the west side of the A360 (to be outside of the WHS). Access from Winterbourne Stoke to the A303 would be via the existing A303 route to Longbarrow roundabout then southwards to this junction.
44. In both options the existing Longbarrow roundabout would remain as a junction. However, its use would be substantially reduced and it would be appropriate that this junction be modified to reflect the loss of a material east facing arm (except perhaps for access to agricultural frontage and NMU use) and a substantial reduction in traffic volumes accessing Winterbourne Stoke on the western arm, and modifying approach arms on the A360.
45. It is stated that it is not intended to provide street lighting on the A360 junction, but safety issues will be addressed through formal processes, as details are pursued. Wiltshire Council, as a local highway authority, provides street lighting at roundabouts as a matter of policy, and this should be drawn to the attention of HE.
46. It is not intended that a junction be provided for Winterbourne Stoke at the western end of the scheme. This will result in benefits and disbenefits for the residents of and visitors to Winterbourne Stoke. On the one hand residents will need to travel eastwards to the A303/A360 junction in order to travel westwards on the A303, which will clearly add, by degree, to the journey times and costs of residents. On the other hand, the community will benefit from the maximum reduction in through traffic achievable. It is, of course, not a benefit to those businesses that rely on passing trade.
47. Consideration will need to be given to the need to review the layouts of the B3083 junctions with the detrunked A303. It is likely that the B3083 route will become a more attractive through route for local traffic because current difficulties in crossing the A303 through the village will have been removed. This is an issue the Council should discuss with Highways England, in consultation with the parish council.
48. The general location (but no detail as to geometry) of the junctions is shown in outline on the drawings at Appendix F of the [IAR](#). (Description of route options for further appraisal).

#### Public Rights of Way PRoWs

49. The option schemes will have an effect on public rights of way falling within the options corridor. As a result of the length of tunnelled section of road there are rights of way (e.g. Byways 11 and 12) which benefit from a reduction in severance due to the loss

of the existing live A303, or a reduction of traffic remaining on the route. Drawings at Appendix F of the [TAR](#) show all those PROWs adversely affected by the scheme. Paragraph 8.9.1 of the [TAR](#) identifies that Route Option D061 bisects five PROWs including two bridleways and three byways, and Route Option D062 bisects six PROWs including two footpaths, two bridleways and two byways.

50. It is possible that some routes affected by the bypass options for Winterbourne Stoke could be considered for diversion and/or combining to achieve common crossing points. Regardless, it is the responsibility of the Council to protect its rights of way, and to this end grade separated crossings of the A303 would be sought to provide for the greatest level of safety. At grade crossing points (such as occur at some other locations on dualled sections of the A303) are not desirable. The Council should make representations in this regard.
51. The thorny issue of traffic on Byway 12 is not addressed in the proposals, as it is not a directly related aspect of the scheme proposals. The Council, is a partner signatory of the Stonehenge and Avebury WHS Management Plan; Policy 6b of the Management Plan considers the need to address the damage caused by traffic on the byways in the WHS. It is likely that the amount of traffic finding its way onto Byway 12 following the closure of its junctions with the A303 will be minimal (access being available only from Druids Lodge Farm area and Durrington), and that the concerns for this Byway will have been largely addressed by default. The issue of prohibiting driving on the local byways was previously considered by the Council in 2011<sup>2</sup>.

#### Tunnel Maintenance and Diversion Route

52. The nature of tunnels is that they require regular routine maintenance involving closure. The [TAR](#) indicates that regular maintenance of the bores will be undertaken at night when traffic flows are at their lowest. One bore would be maintained at a time, with either the other bore being used for contraflow traffic, or for traffic diverted from the closed bore being diverted to a different route.
53. The local diversion route for closures on the tunnelled section is the same as the route identified as a high load route, namely the A360/B3086/The Packway/A345. Whilst there is unlikely to be an issue in relation to capacity on this route for planned diversions, there are concerns about the B3086/The Packway crossroads junction. It is the officers' view that this junction should be modified to be better able to accommodate both planned and unplanned closures of the tunnel section as an integral part of the DCO proposals.
54. The aspiration of Government is that the A303 shall be an '[Expressway](#)'<sup>3</sup>, ('Expected to meet a minimum standard' – a dual carriageway that is safe, well-built and resilient to delay, and 'Subject to much clearer expectations over performance' – so Highways England is held to account for how well traffic is moving). Such routes use technology to facilitate e.g. regular variable message signs to aid the management of the route and assist the travelling public. At this stage there is no detail as to how such management arrangements would be intended to work either for the Amesbury to Berwick Down section of the A303 or to the east and west of the section. The Council should seek to understand how such messaging might affect drivers' route choices on Wiltshire roads when confronted with delay or diversion messages.

---

<sup>2</sup> REPORT TO WILTSHIRE COUNCIL FILE REF: DPI/T3915/11/20 Prohibition of Driving Order at Stonehenge November 2011

<sup>3</sup> Action for Roads - A network for the 21st century. DfT July 2013, p34



55. Planned closures of the tunnels can be signed remotely at both eastern and western approaches, so that long distance drivers have the opportunity to take alternative high standard routes, such as the M4/M5. Inevitably, however, especially with unplanned closures, the volume of traffic using the alternative route could be material, and have adverse environmental impacts on the Larkhill community. Whilst there should be no serious concerns about the route being used for high loads (above 5.03m, and relatively uncommon), the Council should seek further information on the potential effects on the diversion route from general diverted traffic.

#### Detrunking Issues

56. The consultation options provide for the closure of the existing A303 to general traffic between Countess and Longbarrow junctions. Some parts of the redundant A303 will be used for general access, such as the length to the east of Winterbourne Stoke to Longbarrow. The existing road, where superseded by the new route, will be 'detrunked', downgraded or stopped up as circumstances require. Whichever way, those redundant sections of road will revert either to the Council as the local highway authority, or to private interests if stopped up. There are sections of the road which serve only private interests for vehicular access, including, for example, access to Stonehenge Cottages and to agricultural land. No detail is provided in the [TAR](#) in relation to the intentions for Old Stonehenge Road, but the road could provide a potential access to some local private frontagers, including the Stonehenge Cottages and the top of the eastern portal.
57. The scheme details do not seek to identify the end uses of all parts of the road, but suggest that sections will need to be kept open for local use, including potentially being available for use by non-motorised users to improve access to parts of the WHS. For those sections which fall to the responsibility of the Council under DCO detrunking procedures, it is normal practice for the LHA to be compensated by HE for the additional maintenance burden the roads will present to the Council. The Council therefore needs to have agreed, when the DCO application is submitted, what the compensatory arrangements will be and what will be the end uses of all redundant sections of the A303 route.

#### Excavated Materials

58. A balance of cut and fill materials on the site will be a principal objective. The tunnels will either be bored with a tunnel boring machine (TBM) or excavated by other means internally if a sprayed concrete lining is used. In either event a considerable amount of material will be removed from the tunnel bores as a result. If a TBM is used there is uncertainty as to the potential re-use of the arisings. If a sprayed concrete lining is used, then excavated material is likely to be suitable as embankment fill material. If TBM arisings have to be removed from site there could be a considerable impacts on local haul roads. In such circumstances the Council should seek to protect its roads under the legal provisions available at [s59 of Highways Act 1980](#), through agreement with HE

#### Traffic Regulation Orders

59. Highways England have advised that Traffic Regulation Orders can be included in the DCO process provided they are part of the project. [The Planning Act S2008, s33\(4\)](#), requires, in effect, that orders which would otherwise be made under provisions of the 1980 Highways Act (under sections 10, 14, 16, s18, 106, 108 and 110) cannot be made outside the DCO application; TROs are made under the provisions of the [Road Traffic Regulation Act 1984](#), and therefore not precluded outside of the DCO process. The

Council will need to be assured, before the DCO application is made, that all identified necessary TROs are indeed included in the process, in particular that it is not left for the Council to address TROs necessary to regulate traffic on the existing county road network, or on any de-trunked sections of the existing A303.

#### Winterbourne Stoke Route Option Preference

60. Route options D061 and 062 provide similar overall benefits. The D061 option is stated in the consultation documents as having a more problematic junction arrangement for access to the A360, because it would involve a grade separated junction on the live existing A303 route. The D062 option provides for an off-line grade separated junction for the A360, which would involve more straightforward construction. For Winterbourne Stoke villagers wishing to access the A360 (north and south), both options are similar. However, for trips requiring access to the A303 the north side route would provide a materially shorter route, because its junction would be circa 2.5 km closer to the village centre than the south bypass option.
61. Notwithstanding the issues identified with construction, or other issues raised in this report on archaeological, ecological or other grounds, it would appear that the north bypass option would best suit the travel needs for Winterbourne Stoke A303 users. The two routes around Winterbourne Stoke are likely to have different effects on traffic use of the B3083, with consequential impacts on e.g. Berwick St James for A36 access. Local traffic management might be appropriate to impose a degree of control on traffic types using the road.
62. In broad terms, there appears to be no over-riding case, from a transport perspective, to favour Route Option D061 over D062; HE should be asked to favour the most sustainable route in terms of minimising total vehicle-kilometres, all other matters being equal.

#### Summary on Highways and Transport issues

63. Wiltshire Council Highways and Transport has worked closely with Highways England in developing the proposals and is satisfied with the proposals in general. However, the Council anticipates a number of aspects will have to be resolved with Highways England if adversarial representation to the Examination by the Planning Inspectorate is to be avoided following submission of the DCO application:
  - Impact of the scheme on the local road network, including any TROs to regulate use of former A303, and agreement under s59 Highways Act 1980 in relation to non-A303 haul routes.
  - Design of local road elements of the scheme, including appropriate alterations of junctions as appropriate
  - Surface water drainage
  - Rights of way and access, including segregated crossings
  - De-trunking and transfer of former Highways England assets to Wiltshire Council
  - Improvements to and signing for tunnel and route diversions
  - Requirements for local Traffic Regulation Orders

#### **IV. Public Health and Public Protection Considerations**

64. There are a number of potential impacts that the construction and operational phases of the A303 Amesbury to Berwick Down project may have on the local area in terms of environmental health.
65. Identifying and addressing these at an early stage will allow practical mitigation measures to be built in to the scheme.
66. The public consultation document does not currently give sufficient detail in respect to these issues, as it is still relatively early in the project planning stage. However, as the project develops we would expect the following issues to be addressed to minimise the impact of the scheme.
67. It is acknowledged that this is early to be submitting full comments so the public protection service would reserve the opportunity to make further comment as more detailed information emerges.

#### Noise and Vibration

- Impact from road and tunnel construction including hours of work, vibration (tunnelling and piling operations), positioning of work compounds and plant and vehicle storage
- Long term impact from traffic noise particularly on elevated sections and where future development may introduce new dwellings adjacent to the new route

#### Private Water Supplies

- The Council is responsible for monitoring and risk assessing several private water supplies in Winterbourne Stoke which provide drinking water to a number of properties. The water supplies and associated hydrology and land drainage need to be protected from any impacts from both the construction and operational phases of the scheme

#### Air Quality

- Impact from both the construction phase and long term traffic related pollution at relevant exposure (residential properties)

#### Dust Control

- Impact from the construction phase particularly during the summer months (soil stripping, spoil disposal, creation of cuttings and bunds)

#### Light Nuisance

- Impact of artificial lighting (for working and security) during the construction phase and operation phase.

#### **V. Ecology Considerations**

68. The proposed scheme has the potential to have effects on a number of European nature conservation designations including the River Avon SAC, Salisbury Plain SPA / SAC, Mottisfont Bats SAC and Chilmark Quarries SAC; effects upon these sites will need to be assessed in accordance with Regulation 61 of the Habitats Regulations. The assessment will need to consider direct effects such as the river crossings over

the Avon and the Till and indirect effects on functionality linked land which may be used by mobile qualifying features which occur outside of the designation boundaries. One particular issue to be addressed is likely to be the presence of phosphatic chalk geology in the general area which the tunnel will pass through, and any impact on aquifers and downstream watercourses needs to be controlled, while careful consideration will also need to be given to how any phosphatic chalk overburden might be safely reused in the local area, or whether this material will need to be disposed of elsewhere. The assessment will also need to consider in-combination effects from other relevant plans and projects in the area such as the Wiltshire Core Strategy and the Army Basing Programme.

69. The two options for the Winterbourne Stoke bypass appear broadly similar in terms of potential impacts upon the River Till, however the impact would depend upon the detailed topography and engineering design at either location. The northern routes will bring the road very close to Parsonage Down NNR / SAC, introducing potential impacts upon sensitive chalk grassland and populations of marsh fritillary butterflies, while the southern route would avoid such impacts.
70. The scheme is also likely to impact on a number of locally important County Wildlife Sites, priority habitats and protected / priority / notable species. The final route and detailed design should take full account of these features to ensure that impacts are avoided wherever possible and mitigated where impacts cannot reasonably be avoided. Compensation should be provided as a last resort for any residual impacts which cannot be avoided or mitigated fully.
71. Opportunities for ecological enhancement should also be sought where possible, for example road cutting and use of chalk overburden from the tunnel provide opportunities to create areas of new chalk grassland habitat in the local area.

## **VI. Landscape Considerations**

72. Overall the undergrounding of the A303 through the World Heritage Site will bring large landscape benefits; through the reconnection of physical landscapes and the improved setting and experience of the monuments and OUV. The landscape and visual impacts of the portals can be minimised by testing the different design options that best fit with buried and upstanding archaeological remains. There will be 2km of residual landscape severance within the WHS where the A303 enters the portals at either end of the tunnel.
73. To the west of the tunnel the scheme aspires to create a bypass for the village of Winterbourne Stoke with north and south alternative routes. The northern by pass would place the road further away from Listed buildings and the conservation area of Winterbourne Stoke. The character of the route is typical of the downland landscape that the A303 passes through either side of the tunnel. Although the route passes close to Parsonage Down and some burial mounds, few landscape elements will be removed. Construction would also include a bridge over the River Till and some means of maintaining connectivity for the B3083 and PROWs.
74. The southern route passes between Winterbourne Stoke and Berwick St James, introducing noise and visual intrusion into a quiet tranquil section of the River Till Valley. It will create a perceived severance between the communities and result in a substantial loss of landscape elements. The road would have a strong influence over both villages which might require measures for acoustic and visual mitigation.

75. Therefore, the preferred bypass option at this stage, would be for the Northern route due to the perceived less adverse effects on loss of landscape and visual amenity to local residents.

## **VII. Public Rights of Way (PROWs) Considerations**

76. It is Wiltshire Council's statutory duty to protect the rights of the public to use highways. These highways include public rights of way. We should therefore seek to retain existing rights and, where roads are stopped up, retain appropriate public rights of way along these routes.

### Stonehenge Tunnel Area

77. There are a number of north-south public rights of way which cross or terminate at the A303. The A303 currently provides an east-west highway link between these rights of way, however, most rights of way users at the moment would not use the route to link between them. The removal of road traffic can provide new opportunities for users of non-mechanically propelled vehicles (mpv) to explore the Stonehenge landscape, in line with the aspirations of the management plan. The connectivity currently provided by the A303 from West Amesbury (Stonehenge Road) through to byway AMES11 should be retained after the road is removed.

1) AMES44 (bridleway, Ratfyn crossing) – this connection should be maintained, even if the proposed alterations at Countess Roundabout may have some impact

2) AMES10 (bridleway) – should be unaffected by the proposals

3) AMES13 (footpath) – should be unaffected by the proposals

4) AMES11 (BOAT) – ends at A303. The connectivity between the end of AMES11 and AMES12 should be maintained in order to link rights of way of equal status together to avoid creating dead-end routes, or an alternative and equally convenient link between these two byways should be provided.

5) AMES12 / WCLA1 (BOAT) – should be retained on its current line. Although use of this byway by mpv's causes some damage to the surface, which can spoil the experience for other users, the route is vital as it provides sustainable north-south access through the WHS. The closure of the A303 and A344 may lead to an increase in use of the BOAT by mpv's. This is because it will be the only means by which those who cannot use other forms of transport can enjoy a reasonably close view of the henge without entering through the visitor centre and taking the shuttle buses. As has been demonstrated by the recent closure of one road, the A344, this inevitably puts pressure on the remaining PROW of commensurate status. The planning requirements for the Stonehenge visitor centre took this into account with regard to providing sustainable access from the North along byway 12 (Larkhill) and a condition was added to ensure that it was made fit for purpose by EH. The tunnelling of the A303 will effectively remove a much greater link from the existing network and it should be anticipated that additional pressures will be placed onto the remaining byways-by all classifications of users. The tunnelling of the A303 will remove Stonehenge itself from the nation's gaze, casual viewing pleasure and their deeper subjective connection with the monument and this should not be underestimated.

6) Easy pedestrian access to the King Barrows should be retained. There is currently a small parking area just east of the Longbarrow roundabout; consideration should be

given to retain this and possibly extend to provide this access as it is on the periphery of the WHS

7) Formal public access should be retained along the line of the A303 from the Longbarrow roundabout to AMES12. The route should be dedicated as a restricted byway, again to provide access for carriage drivers.

#### Northern Bypass Route

- 1) WSTO6A – appears to be unaffected
- 2) WSTO6B – might go underneath the proposed bridge, if not connectivity should be maintained
- 3) WSTO4 – appears this would run underneath the proposed bridge, if not connectivity should be maintained
- 4) WSTO3 – appears to be unaffected

#### Southern Bypass Route

- 1) BSJA9 – appears to be unaffected
- 2) BSJA6 and BSJA8 – appears this would go underneath the proposed bridge, if not connectivity should be maintained
- 3) BSJA10 (BOAT) – might go underneath the proposed bridge, if not connectivity should be maintained
- 4) BSJA3 (bridleway) and BSJA3A (BOAT) – these routes currently terminate at the A303. It would be acceptable to stop up BSJA3. BSJA3A should be linked across to SLAN3 so users would not need to access the A303

### **VIII. Archaeology and World Heritage Site Considerations**

#### Background and Policy Context

78. The Wiltshire Council Archaeology Service has a statutory duty to advise on the impact of development proposals on archaeological remains in the County, both within and outside of the Stonehenge and Avebury World Heritage Site (WHS). We take into consideration direct physical impacts on known and potential designated and undesignated heritage assets, issues of setting and visual impact, and in the case of the WHS, possible impact on the attributes of Outstanding Universal Value (OUV). In relation to the A303 Improvement Scheme (the Scheme) we will also have a responsibility for the monitoring and discharge of archaeological conditions/requirements imposed as part of the Development Consent Order (DCO).
79. In addition to our formal statutory role we have been engaged with the Scheme's development over the last few months via a number of working groups associated with the Scheme such as the Natural and Cultural Heritage Working Group, the International Council on Monuments and Sites (ICOMOS) Working Group (set up to respond to issues raised in the initial ICOMOS International Advisory visit in the Autumn of 2015 and subsequent report) and the Heritage Monitoring and Advisory Group.

80. The Council co-funds (with Historic England) and hosts the WHS Coordination Unit within the Archaeology Service. The Unit currently consists of a WHS Partnership Manager and a WHS Partnership Officer tasked with implementing the policies and objectives in the WHS Management Plan.
81. In assessing the potential development impacts of the Scheme as mentioned above, the Archaeology Service is obliged to assess the Scheme in relation to a number of policy documents including:
- The 2015 Stonehenge and Avebury WHS Management Plan with its key policies of protection and enhancement of the Outstanding Universal Values of the WHS. This plan has been formally endorsed and adopted by Wiltshire Council in 2015
  - The Wiltshire Core Strategy (2015) includes a specific robust policy (Policy 59) to ensure the protection of the WHS and its setting from inappropriate Development in order to sustain its outstanding universal value
  - National Planning Policy Framework (NPPF 2012) para 132 and Practice Guidance Further Guidance on World Heritage Sites (2014). These documents set out that substantial harm to or loss of designated heritage assets of the highest significance should be wholly exceptional
  - The ICOMOS Guidance on Heritage Impact Assessments for Cultural Properties (2011). This is designed to inform the assessment of possible development impacts in relation to Outstanding Universal Value.

#### Route Options Appraisals – The Technical Appraisal Reports

82. We have appraised the information presented in the Technical Appraisal Report (TAR), concentrating on the Design Fix C options, D61 and D62 tunnel with Winterbourne Stoke bypass (Option1N and 1S) and F10 (at grade bypass south of the WHS).

#### Client Scheme Requirement Assessment (CSR) and Policy Objectives

83. This assessment looks at options in relation to the four client scheme requirements Transport, Economic Growth, Environment and Economy and Cultural Heritage (*to contribute to the conservation and enhancement of the WHS by improving access both within and to the site*). Each of the options is scored in relation to how strongly they align to meeting the objective.
84. It is clear from the TAR that option F10 scores higher than the other options against the cultural heritage objective, being strongly aligned to this objective. It does not introduce any new infrastructure within the boundaries of the WHS, and is a better fit with Wiltshire Core Strategy heritage objectives and WHS Management Plan. For these reasons, as well as the importance of protecting the OUV of the WHS, the archaeological service would have liked this option to have been included in the public consultation.
85. Both options promoted in the consultation would remove the existing A303 and the sight and sound of associated road noise from a key part of the WHS, providing a significant improvement to the setting of the WHS and allowing for better access. Both options will also allow for the reconnection of the Avenue which is currently severed by the A303.

## Appraisal Summary Tables (ASTs)

86. These are summary scores coming out of the WEBTAG assessment criteria which includes economic, environmental (including historic environment) and social and financial objectives. In the historic environment and the WHS object the overall score for D61 and D62 are considered to have Neutral to Moderate benefit.

### The Consultation Scheme D61 and D62: Issues and concerns

#### Eastern end of Proposed Scheme

87. This part of the Scheme, especially in the vicinity of Countess Roundabout is archaeologically sensitive. It is currently unclear what the impacts may be in terms of road widening, new access roads and other construction impacts. Once further design details have been developed this area will need to be assessed, including potential visual impacts on Vespasian's Camp.

#### Eastern Portal

88. We welcome the proposed location of the Eastern Portal to the East rather than West of the line of the Avenue. This is beneficial compared to the previously consented tunnel scheme. Although the immediate area for the proposed portal does not appear from the evaluation to contain highly significant archaeological remains (see evaluation section below), the surrounding area has many prehistoric burial mounds and ring ditches, both scheduled and unscheduled. The direct and indirect and visual impact of the construction of the Portal on these monuments will need to be assessed, as will the potential damage caused by any access road requirement and other construction impacts. The most concerning issue here is the proposed close proximity of the Portal to the Avenue and the visual impact the portal may have on the settling of not only the Avenue but the designated and undesignated barrows in this area and in particular the King Barrow Ridge Group. Careful design and mitigation will be required in this area.

#### Western Portal

89. The footprint of the proposed portal has been evaluated and no highly significant features found. There are linear features relating to probable prehistoric field systems and one substantial linear feature which are scheduled elsewhere. The issue for the portal is its location on a slightly elevated ridge position which will have an adverse visual impact on the nearby Normanton Barrow Group and the more distant Winterbourne Stoke Group to the North West. If a portal in this general area is to be acceptable it would have to be redesigned or mitigated to minimise these adverse visual impacts on attributes of OUV.

#### D61 Expressway, Bypass North of Winterbourne Stoke

90. No evaluation has been done on this proposed route within the WHS. Outside the WHS some assessment work was carried in 2001 North of Winterbourne Stoke in relation to the previous tunnel and bypass scheme. The route would have a direct impact on an upstanding prehistoric boundary earthwork which is a Scheduled Monument and considered to be of national significance, and then it goes through Diamond Wood, an area of high archaeological potential that has not been evaluated. Moreover, the route is projected to bisect the two recently discovered Neolithic long barrows which must be considered as an adverse impact on attributes of OUV.
91. As it runs westwards out of the WHS it passes through the remains of known ancient field system and the edge of settlement remains to the North East of Oatlands Hill. As it passes to the north of the A303 there are field systems and water meadows and a major water meadow system at the proposed River Till crossing. There is high



archaeological potential as the route passes just to the south of Parsonage Down close to an Iron Age settlement and a complex of prehistoric pits close to the proposed link into the A303.

92. If this proposed road is at grade there is still potential adverse visual impact within the WHS on the Lake and Normanton Down Barrow Groups. The proposed junction with the A360 1 km west of the WHS boundary is in an area of high archaeological potential (not evaluated yet) with a potential adverse visual impact on the Winterbourne Stoke Barrow Group.

#### D62 Expressway, Bypass South of Winterbourne Stoke

93. No archaeological evaluation has yet been undertaken for the proposed expressway leading out of the proposed western portal, either within or outside of the WHS. In general we know less about this route in terms of archaeology than the D61 route.
94. Within the WHS the route crosses a known upstanding prehistoric boundary earthwork which is a Scheduled Monument and considered to be of national significance. It also crosses an area of probable prehistoric field system and where it goes through Diamond Wood, an area of high archaeological potential. Outside of the WHS boundary the proposed road seems to avoid areas of known significant archaeology, passing south of Oatlands Hill although there are some linear features and a possible ring ditch along the route south of Winterbourne Stoke. There is a proposed new road junction just outside the WHS boundary within the Park area. This is just north of a complex of Iron Age enclosures and there is high potential for further remains in the area of the junction.
95. This route has the advantage over D61 being located in a lower area with less potential visual impact. However, if the road is at grade there is still potential adverse visual impact within the WHS on the Lake and Normanton Down Barrow Groups, and there is a potential adverse visual impact from the proposed junction with the A360.
96. With both of these proposed expressway routes we are concerned about how the large tunnel machinery is going to access the western portion of the WHS where there are lots of buried and upstanding archaeological remains. We would want to see details of this within the DCO applications along with the impact assessment of all temporary construction impacts.

#### Solstice Alignments and Dark Skies

97. None of the documents which accompany the non-statutory consultation consider the effects of the D61 and D62 on the astronomical element of the OUV of the Stonehenge part of the WHS. The significance of Stonehenge and associated monuments in relation to solstitial alignments is a key feature in the WHS nomination document and is recognised as an attribute of the OUV of the site. Policy 1e of the 2015 WHS Management Plan states the need to *minimise light pollution to avoid adverse impacts on the WHS, its setting and its attributes of OUV.*
98. The latest consideration of the Solstice alignments at Stonehenge by Clive Ruggles has suggested that it may be the winter sunset solstice alignment which is actually more significant than mid-summer sunrise. He has suggested that the approach to Stonehenge via the Avenue puts the viewer directly on the alignment of the Winter sunset, framed by the stones within the henge.
99. The alignments of both D61 and D62, from where they exit the western portal until they pass over Oatlands Hill, have the potential to affect this highly significant element of OUV, an element which has not been previously disturbed by the existing A303. In

particular, the proposed grade separated junction with the A360 on D62 is directly on the line of the Winter solstice and so has the potential to affect the view. Light from car headlights and any road lighting is also an issue that needs to be considered.

100. This highly significant element of OUV has not been considered in the documents submitted for the Non-Statutory consultation, and so it calls into question the overall slightly beneficial score given to these routes on this criteria.
101. On the whole D61 (North of Winterbourne Stoke) is less desirable in our view in terms of impact on the OUV. However, there are major issues with D62 (solstitial alignment, position of Western Portal, impact of expressway) that would need to be addressed as the scheme is developed.

#### Excavated Materials/Spoil from Tunnel

102. Whichever method of tunnel boring is used will result in a great quantity of spoil. The disposing of spoil to build up areas within the WHS may be difficult on heritage grounds, as may the disposing of it in archaeologically sensitive areas outside of the WHS, also we will need to have evaluation of areas for temporary storage of spoil.

#### Archaeological Evaluation

103. Some archaeological evaluation has started to be undertaken in relation to the proposed tunnel scheme but only within the WHS boundary. The evaluation has involved non-intrusive studies and surveys in the first instance including aerial photographic survey and geophysical surveys. Both magnetometer and Ground Penetrating Radar (GPR) techniques have been used in parts of the evaluated areas. Use has also been made of the results of recent archaeological research undertaken by Historic England in the southern part of the WHS (written reports pending).
104. To date trial trenching has been undertaken in three areas of the WHS which could be impacted by the proposed tunnel schemes. The location of the trenches in these areas have been guided by the results of the geophysical surveys. Area NE2 is just north of the A303 at the end of the WHS. Where the proposed location of the East Portal is proposed 27 trenches have been recently excavated (report pending). The only archaeologically significant feature found was an undated ditch which is likely to be part of a prehistoric field system as marked on the Historic Environment Record.
105. In the South West part of the WHS two further areas have had trial trenching. SW1 had 35 trenches and mainly located the remains of ditches (probably traces of prehistoric field systems). There was one previously known large linear feature known as a Wessex Linear, a Late Bronze age or early Iron Age boundary. This is the area that has been proposed for the location of the Western Portal.
106. SW2 is located close to the western boundary of the WHS (where part of the proposed expressway for D62) and had 32 trenches. The trenches identified some highly significant archaeological remains which are considered as attributes of OUV. It confirmed the presence of two Early Neolithic Long Barrows and a penannular ditched enclosure with two cremation burials dating to the Late Neolithic. The proposed Expressway for D61 is currently bisecting the two Long Barrows.

#### Archaeological Evaluation: Further Requirements

107. A considerable amount of archaeological evaluation, both within and outside of the WHS is still required before the submission of the DCO. We would advise that this is undertaken as early as possible so the results can be used to help influence the final

design of the Scheme that gets taken forward and will feed into the Environmental Assessments. The evaluation will need to include not only total coverage of the proposed expressways but also the proposed road junction areas outside of the WHS and all drainage areas, attenuation ponds, aquifer etc. We will also require all proposed construction impact such as access roads, compounds, temporary spoil storage areas to be evaluated in advance of the submission of the DCO.

#### Archaeological Assessments: Further Requirements

108. We would expect to see a full and detailed Environmental Statement submitted with the DCO covering all aspects of the historic environment. This should also include a full assessment on the impact of OUV carried out in accordance with the ICOMOS Guidance on Heritage Impact Assessments for Cultural Properties (2011). This assessment has not yet been done in relation to the Scheme.
109. Construction impacts and temporary impacts will need to be assessed in same way as permanent impacts (direct and indirect).

#### Summary of Archaeology and Historic Environment Issues

110. Wiltshire Council Archaeology Service over the last few months has worked in conjunction with other heritage agencies and Highways England in developing the option proposals. What we can say here is still outline and limited as detailed design of the scheme has not yet been done and the archaeological/historic environment evaluation and assessments are not completed.
111. It is clear that the removal of the A303 through the World Heritage Site (WHS) inherent in all of the assessed schemes will bring huge benefits for the centre of the WHS. With the proposed tunnel options D61 and D62 the position of the Eastern Portal to the east of the Avenue brings the benefit of being able to reunite the currently severed line of this important monument.
112. There are significant issues and risks with the proposed tunnel scheme for proposed options, D61 and D62. In their current form we consider both options have potential of adverse impacts on OUV which outweigh the benefits of the scheme especially in relation to the location of the western portal and expressway.
113. Either scheme would require a significant amount of further evaluation and assessment and would require a significant amount of archaeological mitigation both inside and outside of the WHS. This may have financial implications and impact on the timescale for delivery of the project and needs to be considered as part of ongoing evaluation/assessment/design work should the project go forward.
114. However, on present evidence it *may* be possible that with some re-design and mitigation the south of Winterbourne Stoke bypass option D62 may be considered *marginally beneficial* for heritage compared with D61 and the current baseline situation, but the following issues should be resolved prior to the DCO submission.
  - The Eastern portal location and design developed to minimise proximity and visual impact on the Avenue and King Barrow Ridge
  - The design and location of the Western portal, expressway and junctions are developed/amended to avoid the current predicted major adverse impact on heritage and outstanding universal value especially in relation to the Scheduled Barrow Groups and other attributes of OUV

- The expressway and junction alignments do not adversely impact on Solstitial alignments
- All required archaeological evaluation assessment within and outside WHS are completed in time to feed into the assessment work and submission of the DCO.
- Mitigation measures will be in place to offset potential adverse impact on OUV and other significant heritage assets.

## **IX. Built Heritage Considerations**

115. The comments below highlight the elements of the historic built environment that may be affected by the proposed road schemes between Countess Roundabout and west of Winterbourne Stoke.

### **Countess Roundabout (A345) Flyover to Eastern Tunnel Entrance**

116. The grade II\* registered park of Amesbury Abbey (itself grade I listed), specifically the section known as Lords' Walk, abuts the A303 embankment by the footbridge about 500m east of the roundabout, and close to the start of the anticipated ramp of the flyover. The differing levels and limited intervisibility suggest that there would be little or no change to the setting of the RPG.
117. 10m NW of the roundabout lies Countess Farm, a group of six grade II listed buildings including the C17 farmhouse. The setting of these buildings has long been affected by the road's presence, but the scale of the flyover structure and its inevitably urban character is likely to have a significant, potentially overbearing, impact, and form a more solid physical and visual barrier between the farm and the town of Amesbury.
118. 35m S of the roundabout lies a grade II listed stone bridge over the Avon. This bridge lies in a corner between the wall of the park and the modern A345; its setting would be affected but I would suggest this to be at the lower end of 'less than substantial harm' (as defined by NPPF).
119. On the A345 roadside 120m S of the roundabout lies Diana's House, a grade II\* listed former lodge to the Abbey. The northern outlook from this important building would be adversely affected, but not to a level of substantial harm to the listed building or its immediate setting.
120. Amesbury Conservation Area abuts the A303 along its southern side for a distance of 900m west of the roundabout, to the western edge of 'Vespasian's Camp'. All of this land is also within the Abbey's registered park, and contains several grade II\* listed structures. The proposal appears to move the dual carriageway slightly further from the edge of the CA and RPG, before entering into the tunnel 400m to the west of the CA boundary, also about 400m to the north of the small village of West Amesbury which has its own CA and grade I listed W Amesbury House. There would be no additional adverse impacts on the designated built heritage assets, and there probably would be some benefits of noise reduction in West Amesbury. The removal of access to the A303 using Stonehenge Rd from the upper Woodford valley will presumably need to be addressed, although no proposal is shown.
121. Stonehenge Cottages. These early C20 thatched cottages (unlisted) lie on the N side of the current A303, and their setting would be much improved as the proposed tunnel would pass underneath them.

### **Winterbourne Stoke, Northern Bypass Option from Western Tunnel Entrance**

122. The northern option crosses the A360 in open farmland, then the A303 northward and descends to the Till valley floor with embankments and a bridge, before cutting across fields to the NW of the village and rejoining the existing route. There are no known heritage assets whose setting would be adversely visually affected by this route. A good quality undesignated cartshed at Foredown Barn would be 550m from the new road, some 300m closer than currently, and brought into greater public view. The building may be worthy of listing, but the slightly increased impact on this isolated building would clearly be outweighed by other heritage benefits.
123. Winterbourne Stoke Conservation Area abuts the southern side of the A303, although in reality this is only to include the grounds of the grade II\* Manor House and its curtilage structures, all in very close proximity to the existing road. The remainder of the CA lies to the south focused along Church St. The existing A303 has little direct impact on most of the CA, although it does limit local movement, and generates a level of noise – limited by reduced traffic speeds. The noise level of the new bypass could be significant in its impact on the relatively quiet nature of the CA at present, depending on the surfacing materials and detail of cuttings and embankments, although the increased distance from the edge of the CA would provide some mitigation. There would be a significant improvement in the visual setting of the Manor House.

### **Winterbourne Stoke, Southern Bypass Option from Western Tunnel Entrance**

124. The southern option crosses the A360 and bisects a large historic landscape feature known as 'The Park' on C19 maps. The four-sided 35ha Park is currently in arable use, with a thick wooded boundary on each side. While not a built heritage asset, this is clearly a notable manmade landscape feature, possibly associated with the historic farms nearby, whose significance should be explored further if this route option is pursued.
125. The collection of farm buildings immediately to the west of The Park is entirely modern.
126. Asserton Farm, 400m S of proposed route, while containing no listed buildings, is largely C19. The primary impact on this site would be noise.
127. New bridge over Till, approx. 600m S of the southern boundary of Winterbourne Stoke CA, and new embankments heading NW to rejoin existing carriageway. The grade II\* listed church, adjacent grade II Old Rectory and Church Cottage abut the southern CA boundary and can be clearly seen from the crossing points of the river and the Winterbourne Stoke/Berwick St James road. The land to the south of the CA is level and the road and bridge would clearly intrude into this rural setting, both visually and aurally.
128. 300m to the south of the bridge lies an unlisted thatched cottage (C19 or earlier), White Lodge, whose tranquil rural setting would be severely compromised.
129. Asserton House, a grade II listed building, lies approx. 450m to the south of this route.
130. The southern route passes about 450m to the N of Berwick St James CA. Currently the road noise from the A303 has little impact on the historic character of this CA, whereas the introduction of the dual-carriageway across the open landscape of the river valley would have a significant adverse visual and aural impact.
131. This option also offers significant improvements to the setting of the Manor House at the northern edge of the CA.

132. Therefore, in light of the above, the Northern bypass route would be the preferred option at the present time.

#### **X. Flood Risk and Drainage Considerations**

133. Wiltshire Council will have to give consent as Lead Local Flood Authority (LLFA) for ground water and land drainage after assessing the flood risk. Once the framework has been agreed it may be necessary to have the information peer reviewed via our consultants, which is subject to ongoing discussions with Highways England relating to methodology and costs.
134. The Environment Agency will approve some of the design for water quality, licensing etc., however the greater part of the consenting process will remain with Wiltshire Council.
135. Further information has been requested on the A303 scheme for ground water and drainage as there is only an outline plan available to date.
136. The Council needs to ensure that the temporary proposals and permanent solutions have adequately considered all flood and draining considerations, including how it will function once its constructed. It will be imperative to ensure that this scheme does not increase the flood risk anywhere else as a result.

#### **XI. Procedural Issues and Next Steps**

137. As a nationally significant infrastructure project, this scheme will be dealt with under the Development Consent Order (DCO) process. The role of the Council within this process is therefore as a statutory consultee. The Council has considered its position on a number of aspects as set out in this non-statutory consultation response. The Council wish to make clear to Highways England that it is fully committed to the DCO process, and supports this proposal in principle, but subject to the making of a objective balanced planning judgement in relation to the outputs of the assessments necessary to address the detailed comments set out in this consultation response. The Council asks that Highways England takes these comments into full consideration.

**Wiltshire Council**

**Cabinet**

**14 March 2017**

---

**Subject: Wiltshire Council's Housing Board Annual Report**

**Cabinet Member: Cllr Jonathon Seed  
Cabinet Member for Housing (exc. Strategic Housing),  
Leisure, Libraries and Flooding**

**Key Decision: No**

---

## **Executive Summary**

The purpose of this report is to update Cabinet regarding the activities of Wiltshire Council's Housing Board between December 2015 and November 2016 and comply with its Terms of Reference which requires an update to be provided to Cabinet.

Throughout this period, the Board has engaged in a range of activities to shape the service offered to residents and their families, further increase service quality via appropriate monitoring mechanisms, encourage resident engagement and protect the reputation of the council as a landlord by ensuring a robust Business Plan is implemented.

Areas focused on by the Board have included the Housing Revenue Account 30 Year Business Plan, the implications of welfare reform and policy amendments, including the rent reduction of 1% per annum for 4 years. Budget updates and Key Performance Indicator's (KPIs) have also been presented; a Board KPI sub-group assessed targets for the year.

Main current and future strategic risks and actions have been factored into the Board's work, alongside identifying the main priorities for the service and linking these to corporate objectives.

An Elderly Accommodation Council report on Wiltshire Council's Resident Engagement was received by the Board, as was the Environment Select Committee's (ESC) report on resident engagement across Wiltshire. The Board provided its response and has met with the ESC to confirm current arrangements. The Housing Assurance Panel (scrutiny) has presented a number of reports, alongside which the service presented its response; management response updates have also been presented; the HAP has evolved since inception and now engages in joint project work.

Reforms suggested by the Board have been incorporated into our service specific Risk Register, which in turn has been aligned with the corporate Risk Register and a mechanism introduced to ensure that, where necessary, risks are escalated to corporate level. The Board have compared current complaints levels with those of comparable organisations to ensure high standards of operational effectiveness.

Briefings have been given to the Board on a number of topics, including:

- Under and over occupation.
- Level of support for younger residents.
- 'Right to Buy' receipts.
- How feedback is captured in relation to planned maintenance.
- Accommodation for under 35's.
- Development of tenancy inspections.

Via a working group that a number of members are actively involved in, Board members are an intricate element of procuring repairs and planned maintenance services; thus enabling the Board members to update the whole Housing Board and to include all Board members viewpoints when contributing to the working group.

Peer challenge outcomes have been considered and participants contributed toward the formation of a Wiltshire Housing Strategy and the services Annual Report to Tenants and Leaseholders 2015/16; members have been involved in shaping the services' Forward Work plan, as well as reviewing the Resident Engagement Strategy. An updated HRA Scheme Priority Ranking document and a paper on the Sheltered Housing proposed review were also considered.

The Board's Annual General Meeting included an overview of the year, presented by the Chairman and an update on the budget position, as well as an unused question and answer session. The main meeting was dedicated to 3 significant priority items and included debate around the implications of the Autumn Statement 2016:

- HRA Business Plan.
- Asset Management Strategy.
- Building Maintenance Contract Procurement Update.

Board members operate in a fair and balanced manner, maintain their independence and make recommendations to Housing Services; the Board can also make recommendations to Cabinet; however, powers cannot and have not been conferred on the Board so as to enable it to make binding decisions, as outlined in the Paper passed by Cabinet on 22 January 2013.

The Housing Board is nearing completion of its first 4 year cycle, which is linked to the council's local electoral cycle. This provides a sensible opportunity for the service to strategically assess and review the operations of the Board, both in terms of its work and how it interacts with the Executive structure of Wiltshire Council.

The service is minded to engage external independent support, to strategically assess and review the Housing Board, evaluate our current arrangements



against those considered as good practice and provide commentary on how other local authorities manage their own council housing stock.

**Proposal**

For Cabinet to note this Annual Report.

**Reason for Proposal**

Wiltshire Council's Housing Board's Terms of Reference require an Annual Report to be presented to Cabinet.

**Carolyn Godfrey, Corporate Director**

## Wiltshire Council

### Cabinet

14 March 2017

---

**Subject:** Wiltshire Council's Housing Board Annual Report

**Cabinet Member:** Cllr Jonathon Seed  
Cabinet Member for Housing (exc. Strategic Housing),  
Leisure, Libraries and Flooding

**Key Decision:** No

---

#### 1. Purpose of Report

- 1.1 To update Cabinet regarding the activities of Wiltshire Council's Housing Board between December 2015 and November 2016 and comply with its Terms of Reference which requires an update to be provided to Cabinet.

#### 2. Relevance to the Council's Business Plan

- 2.1 As part of their Away-Day's in November 2014 and January 2016, and their regular meetings, the Board set future priorities, which were constructed to complement the Council's Business Plan.

#### 3. Overview and Scrutiny Engagement

- 3.1 This report is for noting by Cabinet and provides an update on the activities of Wiltshire Council's Housing Board. It does not require a decision to be made. The report was presented to the Council's Overview and Scrutiny function (Environment Select Committee) on 22 February 2017. The Environment Select Committee noted the report.

#### 4. Background

- 4.1 At its 22 January 2013 meeting, Cabinet resolved that it approved the setting up of a Management Board for the governance of council housing consisting of an equal number of Councillors, tenants and independents, with a recommendation that such a panel should be in place by April 2013.
- 4.2 Appointments to the Board were made in November 2013 and December 2013 and the Board held its inaugural meeting on 17 December 2013. In January 2014, the Board introduced 'Open Sessions' at the beginning of each meeting where residents could attend and put questions to Board members.
- 4.3 Board meetings are approximately held on a bi-monthly basis:

- a) For the year 2016, meetings were scheduled and held in January, March, May, July (held in September), September (held in October) and November.
- 4.4** The Board's Annual General Meeting was held on 28 November 2016.
- 5. Overview (December 2015 – November 2016)**
- 5.1** The Board did not have a meeting scheduled for December 2015.
- 5.2** Between January 2016 and March 2016, the Board considered the strategic implications of the Housing and Planning Bill (as it was), the Housing Peer Review and financial and budgetary matters, including:
- a) Welfare reform.
  - b) Rent reduction of 1% per annum for 4 years.
  - c) Impact on income, expenditure and reserves.
  - d) Implications for the 30 Year Business Plan.
- 5.3** Furthermore, between January 2016 and March 2016, the Board engaged in group activities to identify the main current and future strategic risks and actions, whilst ensuring that short, medium and long term priorities served to strategically link the service with corporate objectives.
- 5.4** Also between January 2016 and March 2016, the Board received Budget Updates, Key Performance Indicators (KPIs) data and the Elderly Accommodation Council's report on Wiltshire Council's Resident Engagement. An updated Management Response to the Housing Assurance Panel's (HAP) first report entitled 'Introduction to a Tenancy' was received, as were the updated Risk Register and the findings of the Board's sub-group which worked with the service to refine the Risk Register and ensure full compliance with corporate expectations, corporate guidance and the corporate Business Plan. Complaints were compared against comparable housing providers and a briefing was received about under and over occupation of housing. The Board also considered its Work Plan and were verbally updated about procurement and restructure proposals.
- 5.5** Participants also considered and made recommendations, between January 2016 and March 2016, on the following:
- a) Development of Tenancy Inspections.
  - b) Level of Support for Younger Residents.
  - c) Planned Maintenance – How Feedback is Captured.
  - d) Risk Register – Corporate Feedback.
  - e) HAP's third scrutiny report – 'Planned Maintenance: Kitchens and Bathrooms', alongside the Management Response and a general HAP update paper.
  - f) Housing Strategy and Forward Work Programme, which included establishing a sub-group to review performance indicators and targets for 2016/17.
  - g) Housing Peer Challenge Result (Cabinet Paper).

- h) Proposed review of Wiltshire Council's Housing Board.
  - i) 'Right to Buy' Receipts.
  - j) Procurement Process.
- 5.6** Throughout April 2016 and June 2015, Board members received a presentation in respect of the services' Forward Work Programme and made recommendations around their preferred priorities. An End of Year Performance Report was presented alongside the Board's KPI sub-group reporting back, which included agreed targets for the year 2016/17 which were constructed to complement the Board's priorities.
- 5.7** Participants were provided with the Environment Select Committee Tenant Scrutiny Report, considered the Executive Response to this report and provided their own viewpoint, which was to be appended. A briefing was received in respect of accommodation for under 35's, including Selwood Housing's Policy change. As on previous occasions, Board members were verbally updated about the review of the Board and procurement matters.
- 5.8** Between July 2016 and September 2016, the Risk Register was reconsidered and was to become a standing item. KPI's for 2016/17 Q1 were presented along with the Annual Report to Tenants and Leaseholders 2015/16, which was to be made available digitally. Verbal updates were provided in respect of the following:
- a) Housing Strategy Paper for Cabinet.
  - b) Building Maintenance Contract Procurement.
  - c) Housing Revenue Account (HRA) Business Plan.
- 5.9** Also between July 2016 and September 2016, the Board received the Resident Engagement Strategy Review, organised a meeting with the Environment Select Committee (including the Housing Board and its own scrutiny sub-committee, the Housing Assurance Panel) to consider the Tenant Scrutiny Report, and were presented with:
- a) The HAP's fourth scrutiny report, this time relating to the residents' magazine 'Housing Matters'.
  - b) The Management Response to the report on 'Housing Matters'.
  - c) A progress update from the service in respect of the HAP's third scrutiny report, namely 'Planned Maintenance: Kitchens and Bathrooms'.
- 5.10** The Board's September 2016 meeting, which was held in October 2016, included the updated HRA Scheme Priority Ranking and a paper on the Sheltered Housing Proposed Review Criteria, alongside a number of presentations and thorough discussions in respect of:
- a) Building Maintenance Contract Procurement.
  - b) Housing Revenue Account (HRA) Business Plan.
  - c) Asset Management Strategy (AMS).

- 5.11** Furthermore, at their September 2016 meeting, which was held in October 2016, Board members took the view that there was scope to utilise their next meeting to further address and move forward the above matters, particularly as these were cited by the Board as priorities for the service. As such, programmed items were put back to a later meeting.
- 5.12** In November 2016, the Board held its third Annual General Meeting, which included a Housing Revenue Account (HRA) Finance Update and the Chairman's overview of the year. Programmed into the agenda, was a question and answer session. There were no public attendees beyond HAP members; the question and answer session was unused.
- 5.13** Immediately following the AGM meeting, the Board held its regular meeting, which was dedicated to 3 significant priority items:
- a) Housing Revenue Account (HRA) Business Plan – which included a thorough discussion around the current financial model, policy changes and their impact. The outcomes of the Chartered Institute of Housing's Business Plan modelling were added to the January 2017 meeting agenda.
  - b) Asset Management Strategy – which included the Consultation Framework, key actions and the proposal that a residents' focus group be established in relation to the Wiltshire Home Standard. The spirit of consultation was supported by the Board, with the residents' focus group being approved, although a consultation survey was viewed as requiring refinement.
  - c) Building Maintenance Contract Procurement Update.
- 5.14** The Sheltered Housing Review, which is due to furnish the service and members with a strategic overview of the sheltered housing schemes, was due to be presented, however this was later added to the January 2017 meeting agenda.
- 5.15** The Housing Assurance Panel (HAP) sits below the Housing Board. To date, the HAP has produced a number of reports:
- (a) **Project #1 – 'Introduction to a Tenancy' (July 2015).**  
The report was presented at the Board meeting held on 27 July 2015. The management response was presented at the Board meeting held on 5 October 2015. A management response update was presented at the Board meeting held on 25 January 2016.
  - (b) **Project #2 – 'Voids' (October 2015).**  
The report and management response were presented at the Board meeting held on 30 November 2015. A management response update was not required.
  - (c) **Project #3 – 'Planned Maintenance: Kitchens and Bathrooms' (March 2016).**  
The report and management response were presented at the Board meeting held on 21 March 2016. A management response update was presented at the Board meeting held on 5 September 2016.

- (d) **Project #4 – ‘Housing Matters’ (June 2016).**  
The report and management response were presented at the Board meeting held on 5 September 2016. The Board placed the recommendations on hold, pending the outcome of a residents’ survey. A management response update will be timetabled, if and/or when required.
- (e) **Project #5 – ‘Grounds Maintenance (particularly grass cutting)’ (November 2016).**  
The report and management response are due to be presented at the Board meeting to be held on 30 January 2017. A management response update has been timetabled for 22 May 2017.
- (f) **Check-Back #1 – Verbal Exercise (November 2016).**  
The HAP spoke with the appropriate officers, to establish if their recommendations had been implemented, the impact of their recommendations and to gain the feedback of officers. The HAP intends to provide a verbal update to the Housing Board.
- (g) **Joint Project #1 – ‘New Ways of Working: Recruitment and Collaboration’ (ongoing).**  
The HAP has been working in collaboration with Paragon Community Housing’s scrutiny team. Collectively, members have investigated this topic and intend to present a joint report to both the Housing Board and Paragon’s Board.

## 6. Priorities

- 6.1 November 2014 saw the first Board Away-Day entitled ‘Fit For The Future’ which resulted in the Board agreeing its strategic objectives for the year 2015/16.
- 6.2 The Board’s second Away-Day was held in January 2016. Entitled ‘Fit For The Future – Responding to Change’, the session focused on new policies from Government, including Welfare Reform. Information from the General Election 2015, the Summer Budget 2015 and the Comprehensive Spending Review and Autumn Statement from November 2015, were incorporated.
- 6.3 Board members were provided with presentations on and asked to consider the implications of:
  - a) Housing and Planning Bill:
    - i) What is the bill and what does it contain?
    - ii) What are the welfare reforms?
    - iii) Housing Peer Challenge.
  - b) Finance and Budgets:
    - i) Rent reduction of 1% per annum for 4 years.

- ii) What does this mean?
- iii) Impact on income, expenditure and reserves.
- iv) Implications for the 30 Year Business Plan.

**6.4** As part of their Away-Day, the Board agreed:

- a) In respect of the impact on high income tenants, for locally based advice sessions to be held.
- b) For reserves to be utilised to address the situation for the coming months, after which different options would be presented to them.
- c) For information relating to under-occupation and over-occupation, by bedroom size and location, to be presented.
- d) To use the Open Market Register (OMR) to help people to access other forms of affordable housing (as opposed to social or affordable rented housing).
- e) The need for a wider social housing register bringing in more people.
- f) Improvement of the Housing Assurance Panel (HAP – scrutiny) by adding members and involving tenants on a case-by-case basis.
- g) Improved focus on using the Borough Wide Group (BWG) as a consultation body and to consult residents more.
- h) For the service to proceed with its desktop exercise looking at an analysis of the demographics and tenure mix of The Friary, as soon as possible.
- i) To receive a completed Stock Condition Survey and a list of non-economically viable housing (in terms of long term repair and maintenance costs).

**6.5** During 2016, Board members recommended to the service that the following strategic matters be prioritised, as noted in the minutes of their meeting held on 23 May 2016:

- a) “That the main 2 priorities, in respect of the Housing Revenue Account, be:
  - Asset Management Strategy.
  - Housing Revenue Account Business Plan.

Furthermore, in respect of the 2 priorities, above:

- The Board endorses the service having the flexibility to utilise additional resource, as and when required, within the overall finances of the Housing Revenue Account.
- That when the first version of the Asset Management Strategy is presented, it will include proposals for resident consultation, and the full Asset Management Strategy is to be delivered over the coming 12 to 18 months.”

**6.6** Board members operate in a fair and balanced manner, maintain their independence and make recommendations to Housing Services; the

Board can also make recommendations to Cabinet; however, powers cannot and have not been conferred on the Board so as to enable it to make binding decisions, as outlined in the Paper passed by Cabinet on 22 January 2013.

## 7. Review

7.1 The Housing Board is nearing completion of its first 4 year cycle, which is linked to the council's local electoral cycle. This provides a sensible opportunity for the service to strategically assess and review the operations of the Board, both in terms of its work and how it interacts with the Executive structure of Wiltshire Council.

7.2 The service is minded to engage external independent support, to strategically assess and review the Housing Board, evaluate our current arrangements against those considered as good practice and provide commentary on how other local authorities manage their own council housing stock.

## 8. Attendance Record (December 2015 – November 2016)

8.1 Attendance relates to Board meetings only (that is, the figures exclude Away-Days, sub-groups, etcetera).

8.2 Of the 6 meetings held in 2016, attendance was:

WCHB Member	25/01	21/03	23/05	05/09	03/10	28/11	Total
Councillor Richard Clewer	✓	✓	✓	✓	✓	✓	6 (100%)
Angela Britten (Tenant Member)	✗	✓	✓	✓	✓	✗	4 (66.6%)
Robert Chapman (Independent Member)	✓	✓	✓	✓	✓	✓	6 (100%)
Cindy Creasy (Independent Member)	✓	✓	✓	✗	✓	✓	5 (83.3%)
Jacqui Evans (Independent Member)	✓	✗	✗	✗	✗	✓	2 (33.3%)
Lorraine Le-Gate (Tenant Member)	✓	✓	✗	✓	✗	✓	4 (66.6%)
Emma Powell (Tenant Member)	✓	✓	✓	✗	✓	✗	4 (66.6%)
Councillor Ian Tomes	✓	✓	✓	✓	✓	✓	6 (100%)
Councillor Fred Westmoreland	✗	✓	✓	✓	✓	✓	5 (83.3%)

8.3 In early January 2017, Miss Powell (Tenant Member) alerted the service to her departing the Board with immediate effect. As the Board is currently being reviewed (please see section 7), the service has not initiated a recruitment exercise, at this time.



## **9. Safeguarding Implications**

- 9.1 There are no significant safeguarding implications associated with this proposal.

## **10. Public Health Implications**

- 10.1 There are no significant public health implications associated with this proposal.

## **11. Corporate Procurement Implications**

- 11.1 There are no significant corporate procurement implications associated with this proposal; although should the Board make recommendations regarding procurement of services to be delivered to residents, then this will become a consideration.

## **12. Equalities Impact of the Proposal**

- 12.1 All Board members operate in and treat all residents in a fair and balanced manner, maintain their independence and make recommendations to Housing Services. Board members do not represent a particular area; they represent all council residents in the county of Wiltshire and make recommendations in the best interests of all council residents in Wiltshire.

## **13. Environmental and Climate Change Consideration**

- 13.1 There are no significant environmental or climate change implications associated with this proposal.

## **14. Risk Assessment**

- 14.1 Risks that may arise if the proposed decision and related work is not taken:** Wiltshire Council's Housing Board would fail to meet the requirements of its Terms of Reference, namely to provide an Annual Report to Cabinet and potential deterioration of or missed opportunity to improve services if the Board were not to focus their efforts on the identified priorities. This paper is only for noting.

- 14.2 Risks that may arise if the proposed decision is taken and actions that will be taken to manage these risks:** Wiltshire Council's Housing Board may fail to make recommendations which improve services for residents and their families, missing an opportunity for improvement, or make recommendations which leads to a deterioration of service quality. This paper is only for noting.

- 14.3 Powers cannot and have not been conferred on the Board so as to enable it to make binding decisions, as outlined in the Paper passed by Cabinet on 22 January 2013. The Board makes recommendations to Housing Services and can make recommendations to Cabinet.

## **15. Financial Implications**

15.1 There are no significant financial implications associated with this proposal.

## **16. Legal Implications**

16.1 There are no significant legal implications associated with this proposal.

## **17. Options Considered**

17.1 A formal report to Cabinet is required. No alternative options were considered.

## **18. Conclusions**

18.1 There is increasing evidence that Wiltshire Council's Housing Board is having a positive impact on the quality of service provision to residents and their families, has itself created an additional opportunity for residents to engage with the service and shaped further engagement opportunities.

## **19. Proposal**

19.1 For Cabinet to note this Annual Report.

## **20. Reason for Proposal**

20.1 Wiltshire Council's Housing Board's Terms of Reference require an Annual Report to be presented to Cabinet.

## **James Cawley (Associate Director, Adult Care Commissioning and Housing)**

---

Report Author: Ian Seeckts, Governance and Scrutiny Officer,  
[ian.seeckts@wiltshire.gov.uk](mailto:ian.seeckts@wiltshire.gov.uk), Tel: 01722 434353

16 January 2017

## **Appendices**

Appendix 1 – Housing Priorities and Workplan (April 2016).

Appendix 2 – Service Plan Monitor (external Excel file).

## **Background Papers**

The following documents have been relied on in the preparation of this report:

None.

**Appendix 1**

(please note: document relates to multiple housing services, not just the council’s landlord business which are highlighted in orange)  
Please also consider Appendix 2: Service Plan Monitor (external Excel file).

**Housing Priorities and Workplan (April 2016)**

<b>Priority</b>	<b>Action(s)</b>	<b>Lead Officer</b>	<b>Target date</b>	<b>Notes</b>
1 Ensure residents are able to access a range of housing and care options to meet needs	a) Promote the Open Market Register to support access to home ownership	John Walker	October 2016	
	b) Options paper on the models for affordable housing to address;  (i) Where applicants on benefits unable to afford rented e.g. large families/under 35s – what are the options? (ii) RP affordability tests – review impact on customers and volume affected (iii) What options can be delivered that are affordable and accessible (iv) Alternatives to RP delivery due to reduced capacity of RPs and more risk averse approach & less delivery of rented through planning	Helen Taylor	March 2017	Within the next 12 months
	c) Ensure options in place to accommodate refugee households  i) Work with voluntary sector and colleagues to deliver accommodation and services for	Nicole Smith	August 2016	Phase 1 complete, phase 2 started and due in UK 2 <sup>nd</sup> week in June 16

	refugee households			
	<p>d) Gypsy and Traveller site refurbishment – Phase 2</p> <p>i) Decision regarding options</p> <p>ii) Completion of works</p>	Tim Bruce / Mike Davies	September 2016 September 2018	Revised paper now with JC
	<p>e) New Build programme and delivery of new affordable housing to meet need</p> <p>I. Council house build programme</p> <p>II. Enabling of new affordable homes</p>	Tim Bruce Helen Taylor	March 2018 March 2017	
2 Make best use of existing housing stock in Wiltshire	<p>a) Develop an asset management strategy for council housing stock to include;</p> <p>i. Options for regeneration of estates</p> <p>ii. Disposal strategy and strategy for high value stock</p> <p>iii. Sheltered housing review</p> <p>iv. Strategy for garages</p> <p>v. General stock issues</p> <p>vi. Approach to adapted properties</p> <p>vii. Void standard</p>	Tim Bruce	March 2017	Needs to be completed within next 12 months
3 Review services to ensure they meet need, deliver good value for money and	<p>a) Review support services contracts and re-commission supported housing services</p> <p>(i) Identify services required, develop specification and procure new contracts to meet needs within budget – need new contracts in place by March 2017.</p>	Helen Taylor	October 2017	

deliver good quality outcomes	(ii) Review all accommodation commissioned by the council in Wiltshire across all departments e.g. public health, youth offending, social care services as well as housing.			
	(iii) Ensure effective and quicker move on options			
	b) Review and procure planned and responsive maintenance contracts	Janet O'Brien	September 2017	Interim options followed by long term options going forward
	(i) Consult with managers (ii) Agree how to involve staff & residents (iii) Clarify timeline/project plan (iv) Review policies and procedures			
c) Review Allocations service	John Walker	April 2017		
(i) Monitor demand (ii) Explore options to deliver more cost effective service (iii) Upgrade of Abritas				
d) Review HRA Business Plan	Nicole and Janet – along with finance	April 2017		
(i) budget (ii) impact of housing & planning bill and welfare reform (iii) update policies e.g. tenancy policy				

	(iv) Review service charges including leaseholds (i) Review staff structure in line with agreed priorities			
	e) Explore options for delivering ongoing efficiencies and savings across HRA and general fund	All managers	April 2017	
	f) Review of the Housing Board	James	October 2016	Looking to appoint a consultant
4 Ensure robust strategies and policies are in place supported by a robust evidence base to enable successful delivery of projects and services	a) Develop and adopt Housing Strategy (i) Agree timetable for adoption of the strategy including a programme of consultation (ii) Agree an action plan	James	December 2016	Consultation May / July, followed by Cabinet then adoption at Full Council
	b) Review and develop statutory strategies and policies (i) Homelessness Strategy (including prevention) (ii) Private Sector Renewal Strategy (iii) Tenancy Strategy (iv) Update of policies including Debt policy to reflect legislative changes and audit requirements (v) Update of procedures to reflect changes of policy	Helen Taylor and Ian Seeckts	Review by December 2016	JC to discuss with Robin
	c) Review Wiltshire Housing Partnership	James / Barry	October 2016	

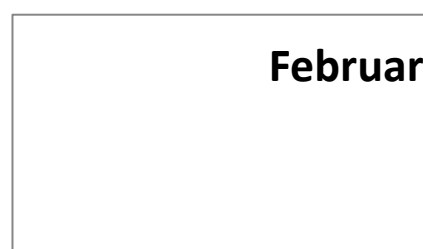
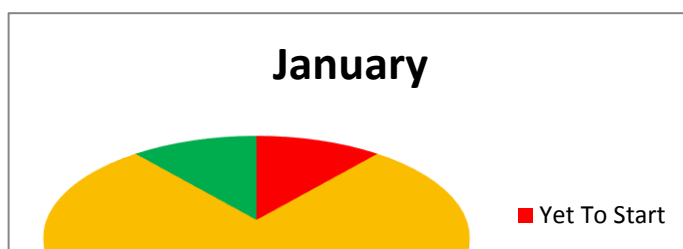
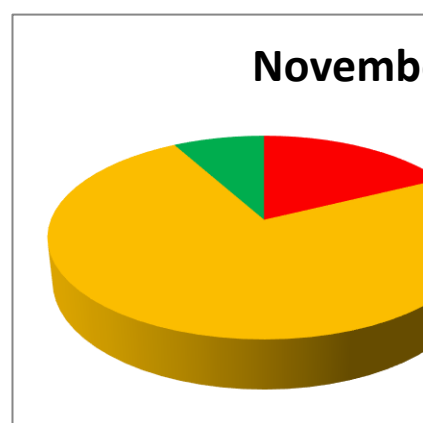
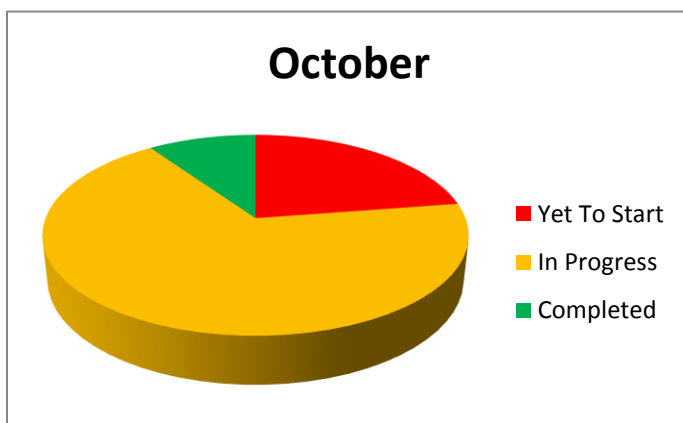
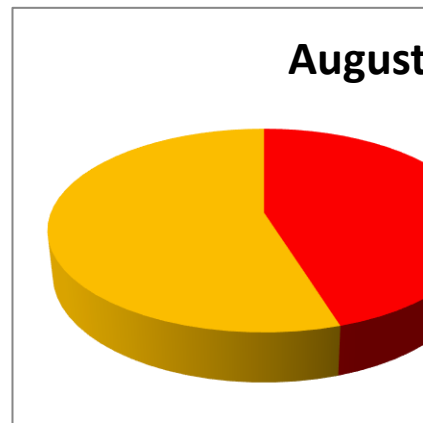
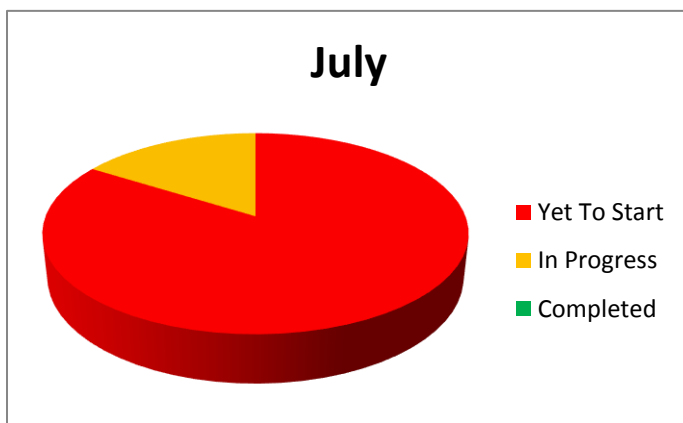
	<ul style="list-style-type: none"> <li>(i) Review role and purpose with partners</li> <li>(ii) Invite Chief Executives of partners to discuss strategy prior to adoption</li> </ul>			
	<ul style="list-style-type: none"> <li>d) Review and consider the impact of any legislative or policy changes <ul style="list-style-type: none"> <li>(i) Impact of Welfare Reform on existing Wiltshire Council tenants</li> <li>(ii) Response of other providers to these changes – understand the impact of this</li> <li>(iii) Support and options for tenants impacted by these changes</li> <li>(iv) Impact on Under 35s – affordability and options</li> <li>(v) Housing and planning bill</li> <li>(vi) Consideration to councils response in creating fixed term tenancies – creation of a tenancy policy</li> </ul> </li> </ul>	Jamie Peters (council tenants / Wiltshire Money)	September 2016	<p>Research and reports underway. UC rollout likely in March 2017.</p> <p>Welfare Reform Report With NS</p> <p>UC report being drafted.</p>
	<ul style="list-style-type: none"> <li>e) To write the housing section of the JSNA for all community areas</li> </ul>	Helen Taylor	July 2016	
5 Implement effective systems for management of the whole housing service & deliver efficiency	<ul style="list-style-type: none"> <li>a) Ensure robust systems are in place for; <ul style="list-style-type: none"> <li>(i) Risk management</li> <li>(ii) Information management/filing (paperless)</li> <li>(iii) Performance management</li> <li>(iv) Budget management</li> <li>(v) Communication</li> <li>(vi) Data sharing</li> </ul> </li> </ul>	Janet / Nicole / Simon	April 2017	Documents to be reviewed and ready by April 2017
	<ul style="list-style-type: none"> <li>b) Building a strong landlord service with our</li> </ul>	Dot Kronda		

savings	<p>residents through effective resident engagement (regulatory framework)</p> <ul style="list-style-type: none"> <li>(i) Work towards a quality mark for resident engagement</li> <li>(ii) Implement audit and ESC recommendations on engagement</li> <li>(iii) Revenue budget to encourage resident engagement</li> </ul>		<p>September 2017</p> <p>April 2017</p> <p>December 2016</p>	
	<ul style="list-style-type: none"> <li>c) Review or service level agreement with Legal to ensure an efficient and effective legal service can be provided <ul style="list-style-type: none"> <li>I. HRA – efficiencies / SLA</li> <li>II. General fund process</li> </ul> </li> </ul>	Nicole Smith	September 2016	

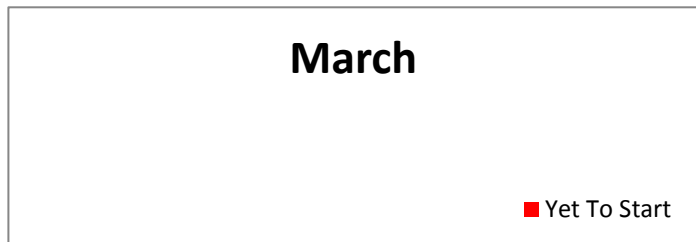
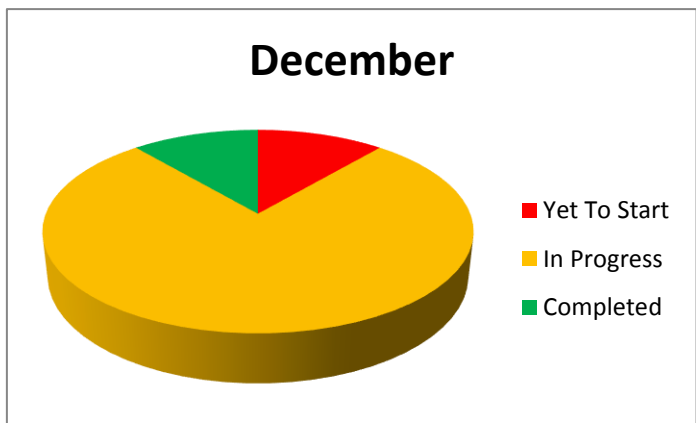
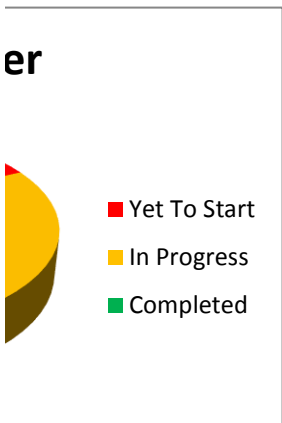
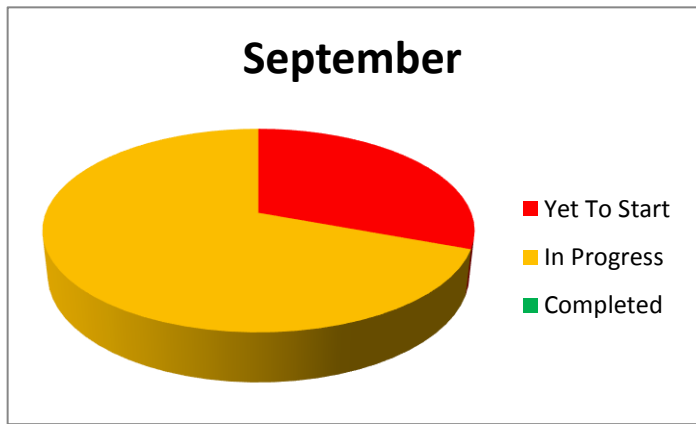


# Housing Priorities and Workplan Housing Service Plan Report

	Month	Yet To Start	In Progress	Completed	Total
2016	July	52	10	0	62
	August	28	34	0	62
	September	19	43	0	62
	October	14	42	6	62
	November	11	46	5	62
	December	7	48	7	62
2017	January	7	48	7	62
	February	0	0	0	0
	March	0	0	0	0







■ In Progress

■ Completed

■ In Progress

■ Completed

**Wiltshire Council**

**Cabinet**

**14 March 2017**

---

**Subject: Sub Regional Independent Fostering Framework**

**Cabinet Member: Councillor Laura Mayes, Cabinet Member for Children's Services  
Councillor Dick Tonge, Cabinet Member for Finance**

**Key Decision: Yes**

---

## **Executive Summary**

This report seeks Cabinet agreement to continue to collaborate with other South West local authorities and join the latest version of the South West Independent Fostering Agency (IFA) Framework Agreement for the procurement of placements for looked after children and young people.

It is essential to ensure we have high quality, sufficient foster care placements in the local area (where applicable) for looked after children and young people who are unable to remain living at home. A sufficient supply of foster care placements is achieved both through recruitment to Wiltshire Council's pool of foster carers and through ensuring access to IFA foster carers.

The council currently procures Independent Fostering Association placements for looked after children through a framework agreement, competitively awarded as part of the South West Sub-Regional group led by Bath and North East Somerset Council.

The current framework agreement commenced 1 April 2013 for three years with a one year extension option to 31 March 2017.

The original participating Local Authorities, except Dorset, are tendering for a new Framework, led by Bath and North East Somerset Council, that will take effect from 1 April 2017 to 31 March 2021, with an option to extend, subject to fee negotiations.

## **Proposal(s)**

It is recommended that Cabinet approves Wiltshire Council to continue to collaborate with other regional local authorities and join the new South West Regional Independent Fostering Agency Framework for placements for looked after children and young people from 1 April 2017 to 31 March 2021, with an option to extend, subject to fee negotiations.

**Reason for Proposals**

There are currently no other procurement options available once the existing framework contract term ceases. Should the Authority not join the new framework then the procurement of independent fostering placements will be off contract with the risk of uncontrolled spend and non-compliance. The Authority will be unable to hold providers to agreed fees, resulting in a risk that the cost of placements will continue to increase year on year, which will clearly impact on the placements budget.

Sub-regional working has proven helpful in terms of bringing consistency to some aspects of IFA provision.

The participating Local Authorities aspire to work with IFA providers who are delivering good outcomes for children and young people.

**Carolyn Godfrey, Corporate Director**

## **Wiltshire Council**

### **Cabinet**

**14 March 2017**

---

**Subject: Sub Regional Independent Fostering Framework**

**Cabinet Member: Councillor Laura Mayes, Cabinet Member for Children's Services  
Councillor Dick Tonge, Cabinet Member for Finance**

**Key Decision: Yes**

---

### **Purpose of Report**

1. This report seeks Cabinet agreement for the Council to continue to collaborate with other regional local authorities and join the new South West Framework Agreement for the procurement of Independent Fostering Agency (IFA) placements for looked after children and young people from 1 April 2017 to 31 March 2021, with an option to extend, subject to fee negotiations.

### **Relevance to the Council's Business Plan**

2. This service supports the delivery of Wiltshire Councils Business Plan 2013-2017 (Outcome 6: People are as protected from harm as far as possible and feel safe).
3. As a part of ensuring that the most vulnerable children are protected, it is essential that we have high quality, sufficient foster care placements in the local area (where applicable) for looked after children and young people who are unable to remain living at home.
4. The vision for Wiltshire Children's Services is:  
"One joined up approach to making a positive difference to outcomes for Wiltshire's children and young people, ensuring they are safe and have high aspirations."
5. A joined-up approach involves making sure that children, young people and families experience easy access to the services they require and that their journey is straightforward limiting the number of assessments and placement moves. It is also important to maximise the resources available reducing any overlaps and duplication and to make sure that services can demonstrate they are making a positive difference to outcomes for children and young people.

### **Main Considerations for the Council**

6. Wiltshire Council currently commissions placements for looked after children in line with our Joint Commissioning Strategy – with emphasis on ensuring that any placements look to achieve both the strategic outcomes of the organisation but most importantly the individual outcomes for the child or

young person being placed. Remaining part of a sub-regional framework agreement will help to achieve these aims.

7. The use of external IFA placements is carefully controlled and they are used when in-house options are not deemed suitable or available. Remaining within the framework supports the improvement of quality and value for money when using IFA placements.
8. The Joint Commissioning Strategy Framework sets out the shared commitment, vision and principles across partner organisations of the Wiltshire Children and Young People's Trust. The Wiltshire Children and Young People's Trust is a partnership of agencies that oversees the development and delivery of outcome-focussed commissioning strategies and services across all agencies.

## **Background**

9. Nationally, there were 69,540 looked after children as of 31 March 2015, an increase of 1% compared to 31 March 2014 and an increase of 6% compared to 31 March 2011. This rise is not just a reflection of a rise in the child population.
10. In 2015, 60 children per 10,000 of the population were looked after nationally, an increase from 2011 when 58 children per 10,000 of the population were looked after.
11. Fostering placements are the most appropriate placement for most looked after children and young people and make up most placements. Fostered children comprise 75% of the care population nationally.
12. Nationally the fostering market is struggling to meet demand and many Independent Fostering Agencies are experiencing significant challenges around growth and recruitment.
13. The table below sets out the number of looked after children as at 31<sup>st</sup> March in Wiltshire:

	<b>2013</b>	<b>2014</b>	<b>2015</b>	<b>2016</b>
Wiltshire	448	402	413	419

14. The council currently procures Independent Fostering Association placements for looked after children through a framework agreement, competitively awarded as part of the South West Sub-Regional group led by Bath and North East Somerset Council.
15. The current framework agreement commenced 1 April 2013 for three years with a one year extension option to 31 March 2017.
16. The framework brings together several Local Authorities that operated in the same geography within the south west, often with common key providers and facing similar issues around quality, pricing and market conditions.



17. The Local Authorities involved in the current Framework, under a formal participation agreement, are:

- Bath and North East Somerset Council
- Bristol City Council
- Gloucestershire County Council
- North Somerset Council
- South Gloucestershire Council
- Swindon
- Wiltshire Council

18. The independent fostering market is made up of a mix of 'not for profit' and private sector organisations; currently there are 34 providers on the framework agreement. The relationship with the market is well developed.

19. The Framework has been successful in delivering placements for children and young people from quality assured Independent Foster Agencies.

20. The table below sets out the number of looked after children and young people placed in independent foster agencies as at 31<sup>st</sup> March:

	<b>2013</b>	<b>2015</b>	<b>2015</b>	<b>2016</b>
Wiltshire	107	96	108	103

### **Overview and Scrutiny Engagement**

21. No overview and scrutiny engagement has taken place, this report however, sets out a repeat procurement of a previous regional framework contract

### **Safeguarding Implications**

22. As this exercise relates directly to looked after children and young people, there are safeguarding considerations.

23. By Wiltshire Council being part of the latest South West Framework Agreement for the procurement of Independent Fostering Agency (IFA) placements for looked after children and young people, we will provide good quality placements to support children and young people who have been harmed or who are at risk of significant harm.

24. By not being part of this framework, children and young people could suffer further difficulties, as the placements team would have limited access to high quality placement providers who are rigorously monitored and checked by Wiltshire Council.

### **Public Health Implications**

25. There are no negative Public Health Implications in Wiltshire Council being part of a new tender exercise. However, there are numerous positive implications for children and young people.

26. By being part of the IFA Wiltshire Council will be ensuring that we have high quality and safe foster care placements available for our most vulnerable looked after children and young people in terms of improving outcomes for this vulnerable group.
27. Providers will be tasked with ensuring that looked after children and young people are receiving support and advice about both their mental and physical health. This includes but is not limited to: ensuring looked after children have regular access to a dentist, access to a GP as and when required, access to additional health services as and when required (for example, Children and Adolescent Mental Health Services), nutrition initiatives and ensuring children and young people have a balanced and healthy diet.

### **Procurement Implications**

28. The procurement of the recommended Framework has been led by officers in Bath and North East Somerset (BANES) Council. It has been supported by officers from Wiltshire Council's Strategic Procurement Hub, who have had oversight of the tender project and support the evaluation process.
29. There are currently no other procurement options available once the existing framework contract term ceases. Should the Authority not seek approval to remain within the framework then the procurement of independent fostering placements will be off contract with the risk of uncontrolled spend and non-compliance. The Authority will be unable to hold providers to agreed fees, resulting in a risk that the cost of placements will continue to increase year of year, which will clearly impact on the placements budget.

### **Equalities Impact of the Proposal**

30. The proposal does not impact on equality and inclusion.
31. All providers who put forward a tender bid will be evaluated against the same criteria, with their equality and inclusion policies being thoroughly reviewed to ensure:
- a. they tackle inequalities
  - b. they do not discriminate in any way, including with employment related practices
  - c. they promote equality and good relations between different groups

### **Environmental and Climate Change Considerations**

32. There are no obvious environmental issues associated with this proposal

### **Risk Assessment**

#### **Risks that may arise if the proposed decision and related work is not taken**

33. The biggest risk of not being part of this sub-regional tender is that we will be unable to access sufficient suitable, safe and local IFA foster placements for Wiltshire Council's looked after children and young people where they are

unable to remain living at home and where suitable in-house fostering placements have not been identified for them.

### **Risks that may arise if the proposed decision is taken and actions that will be taken to manage these risks**

34. Risk: Not enough foster care placements in Wiltshire.

Action to manage the risk: Throughout the life of the contract providers will be encouraged to recruit foster carers within the sub-regional area. The level of need is outlined for provider within the Market Position Statement.

35. Risk: Not enough provision overall within the sub-regional.

Action to manage the risk: Wiltshire Council is already pro-actively working on plans to expand and improve in-house fostering services, with the long-term plan that more children and young people will be placed with in-house carers where appropriate, resulting in less need for independent foster care placements.

### **Financial Implications**

36. Placements with Independent Foster care Agencies are funded from the external placements budget within Children's Social Care. In the current year the total budget is £12.6 million and IFA placements account for approximately £5.4 million spend. The rest of the budget is spent on external residential placements. The external placement budget continues to be under pressure during 2016-17.

37. Average unit costs of IFA placements are significantly lower than for residential placements but higher than in house foster care placements. A significant amount of resource is incurred on placements for looked after children and young people and a joint project team from the Strategic Procurement Hub and Children's Services has been tasked with identifying examples of best practice and developing a range of actions that could be applied to improve current practice and reduce placement spend.

### **Legal Implications**

38. The decision to enter a Framework agreement with other Local Authorities remain subject to the Councils Procurement Rules, Financial Regulations and Protocol 8 contained in the Constitution.

Although the lead authority in this instance is Bath and North East Somerset the Council must satisfy itself as to Best Value, Budgetary constraints etc.

R. 14.3.3 of the Procurement and Contract Rules states:

Collaborative/Joint Purchasing – Where another authority/public body is acting as 'lead buyer' and provided that the person(s) awarding the contract can demonstrate the arrangements comply with the requirements of Best Value and other applicable legislation including, where relevant, the EU Procurement Directives. This includes any recognised wider public sector agreements including, for example, Crown Commercial Services or successor contracts.

It is noted that Procurement advice has been sought in this instance and that the Legal Service at BANES is advising on the Framework itself which the Council may or may not utilise in calling off individual contracts.

## **Options Considered**

### Contracting as a single authority

39. Wiltshire Council has considered several contracting models, including independent block contracting as a single authority (currently being used in Hampshire).
40. At this stage, we would not recommend this model in Wiltshire as it is a resource intensive exercise and we are not satisfied there are currently sufficient placements available locally. Further work is required to establish whether this approach would be effective.

### South West Regional Framework

41. The original participating Local Authorities, except Dorset, are tendering for a new Framework, led by Bath and North East Somerset Council, that will take effect from 1 April 2017 to 31 March 2021, with an option to extend, subject to fee negotiations.
42. Sub-regional working has proven helpful in terms of information sharing and bringing consistency to some aspects of provision.
43. The participating Local Authorities aspire to work with providers who are delivering high quality outcomes for children and young people to prepare them to become useful members of society, by ensuring education, stability and attachment are normal expectations and not exceptional.
44. Framework contracts have been criticised nationally because they have the effect of freezing the market place for the period of the framework. This deters new entrants. To overcome this negative effect, a Dynamic Purchasing System will be used to allow new entrants onto the framework at six monthly intervals.
45. Rates have not increased since the commencement of the framework and whilst this has supported historical cost avoidance for all the authorities it has created risk around the likelihood of future rate increase. We can expect an increase of 3-5% to standard rates from April 2017.

**Robin Townsend (Associate Director, Corporate Function, Procurement and Programme Office)**

**Julia Cramp, Associate Director, Commissioning, Performance and School Effectiveness**

---

Report Author:

Lucy Kitchener, Lead Commissioner

[lucy.kitchener@wiltshire.gov.uk](mailto:lucy.kitchener@wiltshire.gov.uk)

Date of report: 10 February 2017

**Wiltshire Council**

**Cabinet**

**14 March 2017**

---

**Subject: Care Home Tender Contract Awards**

**Cabinet member: Jerry Wickham  
Adult Care, Public Health and Public Protection**

**Key Decision: Yes**

---

## **Executive Summary**

The Council currently uses 3 methods to purchase nursing and residential care home beds for older people in Wiltshire:

- Block contracts – a fixed number of pre-purchased beds which ensures a more competitive rate and guaranteed supply. Under these contracts the Council is committed to the pre-purchased level of spend even if the beds are not fully occupied during the course of the contract.
- Framework contracts – pre-agreed rates, terms and conditions but there is no commitment to purchase beds that are not required. Frameworks do not guarantee supply but support more competitive rates and reduce administration costs around individual placements.
- Spot contracts – beds purchased as required but rates are not pre-agreed so will be at the discretion of the provider.

Block and framework contracts maximise the opportunity for the Council to manage the supply of beds and spend. The contracts also place obligations on the provider to achieve specified quality of care outcomes and to facilitate prompt admissions from the hospitals and the community which supports reducing Delayed Transfers of Care.

The majority of these contracts end on 31/03/17 and in anticipation of this the Council began a tender process for block and framework contracts in October 2016.

Spend on block and framework care home beds depends upon contract prices and the volume of placements made. In the last financial year (excluding OSJ block contract) it was as follows:

Nursing beds block contract	£7.53m
Nursing beds framework contract	£7.37m
Nursing beds spot contract	£5.18m
Residential beds framework contract	£3.87m
Residential beds spot contract	£15.48m
Intermediate care block (Better Care Fund)	£2.9m

Existing block and framework contracts have enabled the Council to limit the purchasing of spot placements and therefore have greater control on spend.

The tender which is the subject of this paper invited bids for the following:

- Nursing home block beds (up to 200)
- Nursing home framework beds (approximately 200\*)
- Residential home framework beds (approximately 200\*)
- Intermediate Care block beds (up to 75)

*\*note that framework contracts do not specify a number of beds therefore we would be looking to award contracts to a sufficient number of providers to enable availability of beds at these volumes*

The tender generated less bids from the market place than desired and this has resulted in a shortfall of 39 block nursing beds. The majority of this reduction was a result of one care provider closing the home which accounted for its current offering of block beds and two providers missing the deadline for placing bids. The remainder of the shortfall is due to existing block providers reducing the number of beds they wish to offer under a block contract.

The number of bids for Framework nursing and residential beds has also reduced and the Council will be conducting a market engagement exercise to establish the reasons for this.

Due to the strategic importance of maintaining the number of block and framework contracts the Council wishes to go out to tender again as soon as possible. This will enable block providers who missed the deadline to submit a bid and it is hoped that market engagement will support additional bids for Framework contracts.

## **Proposals**

1. That Cabinet approves the award of the block and framework contracts as recommended in Appendix 1 which is presented as a Part II paper.
2. That Cabinet approves the undertaking of a re-tendering exercise for further Block Nursing, Framework Nursing and Framework Residential Services in order to address the potential shortfall in the required level of service provision; and
3. Delegates authority to the Corporate Director and the Cabinet Member for Adult Care, Public Health and Public Protection to approve in consultation with the Cabinet member for finance for the award of contracts within the approved budget

**Reason for Proposals**

Awarding block and framework contracts will secure better rates and better availability of care home beds in Wiltshire. This supports budget management and gives greater control on spend. The contracts place requirements on providers with regard to the quality of care that they provide and also with regard to the speed of assessment and admissions. This supports the health and well-being of individuals, and the health and social care system as a whole.

**Carolyn Godfrey**  
**Corporate Director**

## Wiltshire Council

### Cabinet

14 Mar 2017

---

**Subject:** Care Home Tender Contract Awards  
**Cabinet member:** Jerry Wickham -  
Adult Care, Public Health and Public Protection

**Key Decision:** Yes

---

### Purpose of Report

1. This Report requests that Cabinet awards contracts for block and framework care home beds as recommended in Appendix 1 which is presented as a Part II paper. The recommendation is based on the outcome of the tender process which began in October 2016.
2. The Report also requests that Cabinet authorise the Council to go out to tender again for Nursing and Residential Framework beds due to the current tender process generating a reduced number of bids and a shortfall in the above provision.
3. The tender invited bids for the following:
  - Nursing home block beds (*up to 200*)
  - Nursing home framework beds (*approximately 200\**)
  - Residential home framework beds (*approximately 200\**)
  - Intermediate Care block beds (*up to 75*)

\*note that framework contracts do not specify a number of beds therefore we would be looking to award contracts to a sufficient number of providers to enable availability of beds at these volumes
4. The tender generated less bids from the market place than desired and this has resulted in a shortfall of 39 block nursing beds against current provision.
5. The majority of this reduction was a result of one care provider closing the home which accounted for its current offering of block beds and two providers missing the deadline for placing bids.
6. The remainder of the shortfall is due to existing block providers reducing the number of beds they wish to offer under a block contract.



7. The number of bids for Framework nursing and residential beds has also reduced and the Council will be conducting a market engagement exercise to establish the reasons for this.
8. Due to the strategic importance of maintaining the number of contracts, the Council wishes to go out to tender again as soon as possible. This may enable the two block providers who missed the deadline to submit a bid and it is hoped that market engagement will support additional bids for Framework contracts.
9. There is a financial imperative to have new contracts in place as close to the end of previous contracts as possible (contracts end 31<sup>st</sup> March 2017) as this will avoid higher cost spot placement rates being paid in the intervening period.
10. The report requests that Cabinet delegates authority to award contracts following the second tender to the Corporate Director and the Cabinet Member for Adult Care, Public Health and Public Protection.

### **Relevance to the Council's Business Plan**

11. The Council needs to ensure the availability of nursing and residential home beds across Wiltshire at competitive rates in order to meet its duty of care to those who require such placements and in doing so fulfil the following priority:

Protect the most vulnerable in our communities

### **Main Considerations for the Council**

12. The services in question are subject to the Public Procurement Regulations (2006) and are required to be tendered. The Council tendered in October 2016 in adherence to these regulations.
13. Awarding block and framework contracts benefits the Council by:
  - Securing better rates than would be achieved by purchasing on a 'spot' basis
  - Creates greater certainty around levels of spend
  - Secures an availability of beds across the county
  - Places contractual obligations on providers to meet performance outcomes in relation to the quality of care that they provide
  - Places contractual obligations on providers to facilitate prompt admissions particularly in relation to hospital discharge or emergency placements from the community.

### **Background**

14. The Council currently commissions nursing and residential home beds for older people under 'block', 'framework' and 'spot' contracts.

15. A 'block contract' is where the Council pre-purchases a fixed number of beds to guarantee a minimum level of availability in a given locality. The provider is guaranteed payment for these beds whether they are used or not and because of this the Council is able to secure more competitive rates.
16. A 'framework contract' is where the Council agrees terms and conditions, and rates that beds can be purchased at in advance of purchase. The Council is not obliged to purchase beds under this contract but the contract ensures that if it does, the rates are as competitive as possible and do not need to be negotiated on a case by case basis.
17. A 'spot' contract is where the price, and terms and conditions of a bed are negotiated individually at the time that the bed is required.
18. Spend on block and framework care home beds depends upon contract prices and the volume of placements made. In the last financial year (excluding OSJ block contract) it was as follows:

Nursing beds block contract	£7.53m
Nursing beds framework contract	£7.37m
Nursing beds spot contract	£5.18m
Residential beds framework contract	£3.87m
Residential beds spot contract	£15.48m
Intermediate care block (Better Care Fund)	£2.9m

19. In the absence of such contracts the Council would be in the position of having to 'spot' contract and negotiate rates on a case by case basis for all beds purchased. In doing so it would be in the hands of the market with respect to the rates that it was able to secure. It would also not have a guaranteed minimum level of bed availability to support vulnerable residents of Wiltshire who require 24 hr care in a residential/nursing home and for whom it has a duty to meet those needs.
20. Existing block and framework contracts have enabled the Council to limit the purchasing of spot placements and therefore have greater control on spend.

### **Overview & Scrutiny Engagement**

21. A report updating on progress was presented to the Health Select Committee on 10<sup>th</sup> January 2017.

### **Safeguarding Implications**

22. It is important that adults who are vulnerable due to the nature of their physical or mental health condition, and require care in a 24hr setting, have access to nursing/residential home beds to avoid serious risk to their health and well-being.

## **Public Health Implications**

23. The availability of nursing/residential home beds will ensure that those whose health and social care needs cannot be safely met in the community have access to appropriate care and support to maximise their well-being.

## **Procurement Implications**

24. The report seeks approval to award contracts and undertake an additional re-tender process for the reasons set out herein. The procurement processes in both cases were undertaken by the Strategic Procurement Hub together with key council stakeholders, and in accordance with the Council's Contract and Procurement Regulations, Part 10 of the Council's Constitution. A breakdown of the procurement process applied and the recommended contract awards is provided in Appendix 1.

## **Equalities Impact of the Proposal** (detailing conclusions identified from Equality Analysis, sections 4 and 5)

25. The procurement of nursing/residential home beds through block contracts and framework agreements by the Council will support equitable access to 24hr care in a care home setting for people who do not have the financial means to secure this care themselves.
26. The specification for the service states that providers will be expected to demonstrate use of local resources and provision of services which take account of customer's religion and culture.
27. The procurement process ensures that organisations entering into contracts with the Council must have their own policies and procedures in place to comply with the Equality Act 2010.

## **Environmental and Climate Change Considerations**

28. By ensuring a level of choice of nursing/residential bed provision across Wiltshire this will reduce the level of travel and associated costs for families and will help to ensure that Wiltshire residents can remain living in Wiltshire.

## **Risk Assessment**

### **Risks that may arise if the proposed decision and related work is not taken**

29. If contracts are not awarded this will create additional financial pressures for the Council because care home beds would have to be purchased under spot purchase arrangements. The costs of spot

placements are individually negotiated and are likely to be higher than placements made at pre-agreed rates.

30. If the contracts are not awarded in March 2017, there will be insufficient time for the administrative processes to take place before 1st April 2017. The consequence of this will be that the financial benefits of the contracts would be lost during the interim period because placements would need to be made on a spot contract basis.

### **Risks that may arise if the proposed decision is taken and actions that will be taken to manage these risks**

31. Where block contracts are awarded the Council will need to pay for the beds whether it uses them or not.
32. Rigorous oversight and management of empty beds (voids) will be carried out to ensure that voids are kept to a minimum.

### **Financial Implications**

33. Awarding the contracts supports market management and gives greater control on spend because rates, terms and conditions have been agreed up front.
34. Due to the number of nursing block contracted beds decreasing, the total value of spend on block contracts will decrease overall. The tender has resulted in an increase in price per bed however this increase will include the impact of the National Living Wage for those beds. The rates quoted in Appendix 1 are for financial year 17/18 and will incur an uplift in following years. Care homes have indicated in their bids what their cost increases would be for future years of the contract, but the contract does contain a clause which enables the council to cap any increase at the rate of CPI for October of the previous year.
35. Framework residential and framework nursing rates have also increased and, due to a reduction in bids for these contracts, there will be reduced availability of framework contract beds going forward.
36. Intermediate Care block beds are funded through the Better Care Fund.
37. Further work will be required to engage with the market and recommission additional beds at an affordable price.
38. Appendix 1 (Part II Paper) includes further details on the financial implications of awarding the tenders.

### **Legal Implications**

39. Legal advice and support will be required for entering into contracts with providers.

40. Any procurement process must be undertaken in line with the provisions of Part 9 (Financial Regulations) and Part 10 (Contract Regulations) of the Council's Constitution.
41. Any procurement process must also be compliant with the Public Contracts Regulations 2015 (PCR).
42. Legal Services have assisted in the drawing up of the bespoke contractual documentation required. The Cabinet Member decision for award of further contracts will be the executive decision for the further re-commissioning of these services and therefore the final sign-off of the supporting documentation will be able to be effected by the Associate Director Adult Services under their general delegated powers provided that decision is taken in accordance with the executive and in consultation with the Associate Directors Law and Governance and Finance.
43. Failure to properly comply with relevant parts of the Constitution, the Public Contract Regulations and the general principles of contract law could result in a legal challenge. However the risk of challenge will be minimised by the use of a PCR compliant procurement process as overseen by the Strategic Procurement Hub.

### **Options Considered**

44. Award of contracts to providers listed in Appendix 1 (Part II paper)

### **Conclusions**

45. It is recommended that Cabinet:
  1. Approves the award of the block and framework contracts as recommended in Appendix 1 (Part II paper).
  2. Approves the undertaking of a re-tendering exercise for further beds Services in order to address the potential shortfall in the required level of service provision; and
  3. Delegates authority to the Corporate Director and the Cabinet Member for Adult Care, Public Health and Public Protection to approve in consultation with the Cabinet member for finance for the award of contracts within the approved budget

**James Cawley**  
**Associate Director, Adult Social Care Commissioning and Housing**

---

Report Author:

Kath Norton - Community Commissioner  
[Kath.norton@wiltshire.gov.uk](mailto:Kath.norton@wiltshire.gov.uk)  
07831 201429

## **Background Papers**

The following documents have been relied on in the preparation of this report:

None

## **Appendices**

**Please note, the Appendix is confidential and subject to Part II of the Council's Constitution and therefore is not to be published.**

Appendix 1 – Recommended list of contract awards and financial implications

**Wiltshire Council**

**Cabinet Committee**

**14 March 2017**

---

**Subject: Governance arrangements for the prioritisation of spending  
Community Infrastructure Levy**

**Cabinet Member: Councillor To by Sturgis  
Strategic Planning, Development Management, Strategic  
Housing, Operational Property and Waste**

**Key Decision: Yes**

## **Executive Summary**

On 12 May 2015, Wiltshire Council adopted a Community Infrastructure Levy (CIL) Charging Schedule, (subsequently, CIL Instalments Policy and Regulation 123 List and Planning Obligations Supplementary Planning Document (SPD). The Council became a CIL Charging Authority on 18 May 2015.

A revised CIL Regulation 123 List was approved by Cabinet on 13 September 2016 with the resolution to bring back proposals for the process for the prioritisation of the spending of CIL and future reviews of the Regulation 123 List to a future cabinet meeting.

The CIL funds that can be spent by the Council on infrastructure projects will comprise the strategic element of CIL, which is the remaining CIL receipts once the administrative costs (5%) and local funds passed to parish councils (15-25%) have been deducted. In accordance with legislation, strategic funds must be spent on projects identified on the Regulation 123 List and in placing projects on the Regulation 123 List the Council has started to prioritise which projects may receive funding. However, as funding takes time to accrue and CIL will not be able to meet all demands placed on it at once, decisions will need to be made about the strategic projects that should be prioritised for funding.

It is proposed that the spending of CIL forms part of an annual process that involves the following steps: (i) the review of the Council's Infrastructure Delivery Plan (IDP) to ensure it is up to date and identifies strategic infrastructure projects to support the delivery of sustainable growth consistent with the Wiltshire Core Strategy; (ii) the review of the Regulation 123 List to determine whether new projects should be added to the List (or taken off, if they have been delivered or no longer needed) - with changes being subject to consultation and approval by Cabinet; and (iii) prioritisation of strategic projects on Regulation 123 List that should receive CIL funding against criteria - involving workshop with members of Cabinet Capital Assets Committee to which members of the Wiltshire Public Service Board would be invited to consider priorities and inform a formal recommendation to Cabinet.

The timing of the process should commence after 1 April each year in order to inform the annual capital programme and budget setting process. However, as the Regulation 123 List has recently been reviewed, the next step this year will be to prioritise the projects to receive funding.

### **Proposals**

That Cabinet:

- (i) Approves the process for the review of the Regulation 123 List and prioritising the spending of strategic funds raised through the Community Infrastructure Levy as set out in Appendix 2;
- (ii) Agrees that for 2017, the next step would be to prioritise projects for funding consistent with the current Regulation 123 List.

### **Reason for Proposal**

To assist with the effective operation of CIL and ensure open and transparent decision making in the allocation of strategic CIL funds.

**Dr Carlton Brand**  
**Corporate Director**



**Wiltshire Council**

**Cabinet Committee**

**14 March 2017**

---

**Governance arrangements for the prioritisation of spending Community Infrastructure Levy**

**Cabinet Member: Councillor Toby Sturgis**  
**Strategic Planning, Development Management, Strategic Housing, Operational Property and Waste**

**Key Decision: Yes**

---

**Purpose of Report**

1. To:
  - (i) Recommend and agree the process for prioritising the spending of the strategic funds raised through Community Infrastructure Levy (CIL) and reviewing the Regulation 123 List to ensure open and transparent decision making in the allocation of strategic funds.

**Relevance to the Council's Business Plan**

2. The following key actions and outcomes in the Council's Business Plan are relevant to this report:

Key Action Two: Stimulate economic growth in partnership with the Swindon and Wiltshire Local Enterprise Partnership

Outcome One: Wiltshire has a thriving and growing economy

Outcome Three: Everyone lives in a high quality environment

3. Maintaining an up to date Regulation 123 List will support the effective implementation of CIL. CIL supports the Council's vision to create resilient communities by raising revenue from new development to help pay for infrastructure to support growth. The purpose of CIL is to contribute to the funding of the infrastructure needed to support growth and aspirations as set out in the Wiltshire Core Strategy.

**Background**

4. Wiltshire Council became a CIL Charging Authority on 18 May 2015, following the adoption of a CIL Charging Schedule, Planning Obligations Supplementary

Planning Document (SPD), CIL Instalments Policy and Regulation 123 List on 12 May 2015. Since then both the SPD and Regulation 123 List have been revised. The revised SPD was formally adopted on 18 October 2016 by Council and the revised Regulation 123 List adopted by Cabinet on 13 September 2016.

5. It was agreed on 13 September that proposals for the process for prioritising spending on the Regulation 123 List and future reviews of the Regulation 123 List should be considered by Cabinet.
6. CIL provides one of the funding mechanisms available for supporting the delivery of infrastructure to support growth as set out in the Wiltshire Core Strategy. In accordance with Government legislation, the general distribution of CIL funds is as follows:
  - Administration costs: 5% retained by Wiltshire Council
  - Local funds: 15% passed to town and parish councils rising to 25% where neighbourhood plans made (capped at £100 per Council tax dwelling per annum in parish area).
  - Strategic funds: Remaining CIL receipts for allocation by Wiltshire Council as Charging Authority.
7. Parish and Town Councils are required to report on how they spend the CIL funds they receive. The Regulation 123 List supports the CIL Charging Schedule, setting out strategic infrastructure types or projects that Wiltshire Council may fund, wholly or partly, through the strategic proportion of CIL. The List takes projects from the Infrastructure Delivery Plan (IDP), which supports the Wiltshire Core Strategy by identifying strategic infrastructure to support the delivery of planned growth.
8. Projects on the Regulation 123 List cannot be funded by planning obligations (Section 106 agreements). The List does not apply to the ring-fenced proportion of CIL passed to town and parish councils for them to allocate to community infrastructure projects.
9. Planning Practice Guidance (PPG) recognises Regulation 123 Lists may need updating. It advises charging authorities should ensure changes are explained and subject to appropriate local consultation: "*Authorities may amend their charging schedule, subject to appropriate consultation. However, where a change to the regulation 123 list would have a very significant impact on the viability evidence that supported the examination of the charging schedule, this should be made as part of a review of the charging schedule*" (PPG ref: 25-098-20140612).
10. In accordance with legislation, the Council as charging authority publishes a monitoring report by 31 December each year for the previous financial year. The monitoring report identifies how much CIL the Council has: received in any year; passed to the parish councils; used for administrative costs and, in the future, spent on strategic projects. The latest report shows that the Council received £1,202,814.61 strategic CIL funding in the first 19 months of operation.

## Main Considerations for the Council

11. The process for allocating the strategic proportion of CIL should be linked with future updates of the Regulation 123 List, given that funds can only be spent on infrastructure identified on the List. CIL funds take time to accrue and in order to ensure that spending decisions are made on available funds consideration would only need to be given to the allocation of funds on an annual basis, with the final decision taken by Cabinet. However, it may be appropriate to consider future projection of CIL funds where infrastructure projects need to be funded over a number of years.
12. The Regulations state that the Council as Charging Authority must apply CIL to funding the provision, improvement, replacement, operation or maintenance of infrastructure to support the development of its area. It also allows Charging Authorities to pass money to bodies outside their area to deliver infrastructure that will benefit the development of the area. The Council will need to ensure that it is using funding from CIL in the most effective way to help deliver growth as set out in the Core Strategy.
13. By placing items on the Regulation 123 List the Council has started to prioritise funding of infrastructure using CIL funds. However, as funding takes time to accrue CIL will not be able to meet all the demands placed on it at any one time and decisions will need to be made on prioritising spending on items on the List.
14. The Council's Infrastructure Delivery Plan will be reviewed each year to ensure that it remains up to date and identifies strategic infrastructure projects needed to support growth. The strategic service and infrastructure providers including Wiltshire Council services will be consulted using the template at **Appendix 1**. The information received will enable existing projects to be updated or new projects added and will capture information to help determine the project prioritisation process for the spending of the strategic portion of CIL. This will result in consideration first of all, whether new projects should be added or removed from the Regulation 123 List and secondly, which projects require funding that year and should therefore be considered for the allocation of strategic funding received by the Council.
15. **Appendix 2** summarises the process for the annual review of the Infrastructure Delivery Plan, Regulation 123 List and prioritisation and allocation of strategic CIL fund . While it is envisaged that this would be undertaken on an annual basis, the level of available funding will determine whether the allocation of funds can be undertaken this frequently.
16. Projects requiring funding for that year will need to be supported by robust evidence including the cost and practicality of delivering the scheme or project and a clear statement showing the implications of not achieving funding. This information will be reviewed by officers against the following considerations to inform a workshop with members of the Cabinet Capital Asset Committee (CCAC):

- (i) Whether it is on the Regulation 123 List;
  - (ii) How the proposal supports the delivery of growth within the Council's Local Plan (Wiltshire Core Strategy);
  - (iii) Whether it would be 'Essential' (e.g. sustainable transport, education) or 'Place Shaping' (e.g. leisure and recreation) Infrastructure, as set out in the Wiltshire Core Strategy (paragraphs 4.41 and 4.42) - Core Policy 3 prioritises 'Essential' Infrastructure in the event of competing demands;
  - (iv) Is it needed in line with (ii) and to ensure development complies with Habitats Regulations and would not be delivered through other means;
  - (v) Whether alternative sources of funding could be used to deliver the project, and if so which source(s); and
  - (vi) Whether it would enable other sources of funding to be secured that would not otherwise be available (e.g. needed to match or draw down grant funding).
17. The workshop with members of the Cabinet Capital Assets Committee should be open to members of the Wiltshire Public Service Board to attend also. The purpose of the workshop will be to review the funding proposals and consider the prioritisation of projects for the spending of CIL funding that has been accrued taking into account how CIL sits in the wider funding environment prevailing at that time. The final stage in the process would be the formal reporting to Cabinet with recommendations for the allocation of strategic funding.
18. The timing of the process set out in **Appendix 2** should commence after 1 April each year and be timed to inform the annual capital programme and budget setting process. However, as the Regulation 123 List has recently been reviewed, the next step this year will be to prioritise the projects to receive funding.

### **Overview and Scrutiny Engagement**

19. There has been no engagement with the report.

### **Safeguarding Implications**

20. There are no safeguarding issues related to this report.

### **Public Health Implications**

21. Utilisation of CIL funding for programmes should be considered alongside the opportunity costs of alternative calls on this funding. CIL funding can be used for a range of specific healthcare infrastructure needs as a result of development such as GP surgeries, hospitals and other health and social care facilities. It can also be used for wider infrastructure that could improve health or reduce health inequalities such as green infrastructure, park improvements, cycle paths, safer road schemes, flood defences, schools and leisure centres.

### **Procurement Implications**

22. There are no direct procurement implications. Where proposed procurements to

deliver projects on the Regulation 123 List are required then the Strategic Procurement Hub will be consulted to ensure any such projects comply with the Council's Procurement and Contracts Regulations and UK Procurement Law.

### **Equalities Impact of the Proposal**

23. There are no direct equalities impacts arising from the proposal.

### **Environmental and Climate Change Considerations**

24. CIL can help fund infrastructure to support sustainable development and adapt to a changing climate, by funding specific projects. For example, sustainable transport, strategic open space and green infrastructure, flood mitigation measures, sustainable energy infrastructure and strategic habitat protection.
25. CIL may need to be directed towards projects relating to European protected sites before other projects to meet the requirements of the Habitats Directive. This is reflected in the criteria in paragraph 16.

### **Risk Assessment**

26. To ensure effective implementation of CIL, revisions may need to be made to the existing Regulation 123 List to clarify what infrastructure may be funded by CIL.

### **Risks that may arise if the proposed decision and related work is not taken**

27. Formalising the process for updating the IDP and also, the approval of a transparent and open process for reviewing the List and for allocating CIL funds will further help promote understanding.

### **Risks that may arise if the proposed decision is taken and actions that will be taken to manage these risks**

28. Local communities may have the expectation that CIL funds raised in the area should be spent on local infrastructure requirements rather than strategic requirements to support growth. Officers will continue to work with parish and town councils to help manage expectations.

### **Financial Implications**

29. The process and guidelines for allocating and drawing down the CIL funding received are outlined in the report and appendices. All approved allocations will be actioned by Finance as appropriate.

### **Legal Implications**

30. These arrangements are consistent with the legal framework for the Council and meets the Council's obligations under the Community Infrastructure Regulations

### **Options Considered**

31. See Main Considerations section and Financial Implications.

### **Conclusions**

32. Approval of the process as set out in the report for allocating the strategic proportion of CIL, which links with future updates of the Regulation 123 List, will enable transparency in the spending of strategic funding, and provision of strategic infrastructure in Wiltshire.

**Alistair Cunningham**  
**Associate Director Economic Development and Planning**

Report Authors:

Georgina Clampitt Dix, Head of Spatial Planning  
[georgina.clampittdix@wiltshire.gov.uk](mailto:georgina.clampittdix@wiltshire.gov.uk)

Sally Canter, Head of Operations and Delivery  
[sally.canter@wiltshire.gov.uk](mailto:sally.canter@wiltshire.gov.uk)

---

**The following unpublished documents have been relied on in the preparation of this Report:**

#### **Appendices:**

Appendix 1 - Infrastructure Delivery Schedule Form Template

Appendix 2 - Process Flow Chart

By virtue of paragraph(s) 3 of Part 1 of Schedule 12A of the Local Government Act 1972.

Document is Restricted

This page is intentionally left blank



By virtue of paragraph(s) 3 of Part 1 of Schedule 12A  
of the Local Government Act 1972.

Document is Restricted

This page is intentionally left blank

By virtue of paragraph(s) 3 of Part 1 of Schedule 12A  
of the Local Government Act 1972.

Document is Restricted

This page is intentionally left blank

By virtue of paragraph(s) 3 of Part 1 of Schedule 12A  
of the Local Government Act 1972.

Document is Restricted

This page is intentionally left blank

By virtue of paragraph(s) 3 of Part 1 of Schedule 12A  
of the Local Government Act 1972.

Document is Restricted

This page is intentionally left blank



By virtue of paragraph(s) 3 of Part 1 of Schedule 12A  
of the Local Government Act 1972.

Document is Restricted

This page is intentionally left blank

By virtue of paragraph(s) 3 of Part 1 of Schedule 12A  
of the Local Government Act 1972.

Document is Restricted

This page is intentionally left blank