



Chippenham Site Allocations Plan

Chippenham Site Allocations Plan: Site Selection Report

Council Version

April 2016

Wiltshire Council

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Introduction & Background

Introduction

1. The Wiltshire Core Strategy (WCS)¹ requires that approximately 5,090 new homes should be provided in the Chippenham Community Area and that 'at least' 4,510 of these should be at Chippenham.
2. The policy goes on to require allocations for strategic sites to be identified in the Chippenham Site Allocations Development Plan Document (Chippenham Site Allocations Plan) to accommodate approximately 26.5ha of land for employment and at least 2,625 new homes.
3. The method employed to select sites in the submitted draft Chippenham Site Allocations Plan followed that set down in the Wiltshire Core Strategy. This approach followed a 'two stage approach' of determining preferred areas for the town's expansion and then appropriate sites within them. As a result of concerns expressed by the Inspector examining the soundness of the draft Plan, the Council is revisiting this approach².
4. This report replaces the Chippenham Site Selection Report published in February 2015 and presents the results of the schedule of work provided to the Inspector that involved the following:
 - a. a methodology which removes the two stage approach to site identification and replaces it with a parallel assessment of strategic areas and strategic sites that culminates in the comparison of alternative development strategies
 - b. a more straight forward employment-led approach that removes the ranking of criteria.
 - c. additional assessments of new strategic site options within all strategic areas and a review of existing and as well as additional sustainability appraisal;
5. The enhanced methodology employs ten distinct steps, as set out in **APPENDIX 1**. The structure of this report follows each of those steps culminating in the comparison of alternative development strategic and selection of a preferred development strategy³
6. Each chapter of this Site Selection Report will summarise the outcomes and conclusions from each step in the process. In general the detailed assessments are included in a separate Appendix. The assessments rely on existing published evidence and some new evidence to support the new process.

¹ CWCO/01 Wiltshire Core Strategy, Wiltshire Council, January 2015, Core Policy 10 'Spatial Strategy – Chippenham Area

² Letter from the Inspector to the Council, 16 and 30 November 2015 (EX/10, EX/11)

³ Letter from the Council to the Inspector, 4 December 2015 (EX/12)

The Wiltshire Core Strategy –policy context

Scale of development requirements (housing and employment)

7. The Wiltshire Core Strategy (WCS) requires a scale of development at Chippenham of at least 4,510 dwellings and approximately 26.5ha employment land over the plan period 2006 to 2026. A number of dwellings have been built since 2006 and there are planning permissions (including resolutions to grant planning permission) either awaiting commencement or under construction for a further amount.
8. Although Core Policy 10 of the WCS states that the Chippenham Site Allocations Plan should look to allocate strategic mixed use sites to accommodate 26.5ha of employment land and at least 2,625 dwellings this was based on the Housing Land Supply calculated at April 2013.
9. The situation when assessed in April 2014⁴ was included as the baseline data for housing and employment included in the draft Chippenham Site Allocations Plan and is set out in Table 1.1, below.

Table 1: Housing Land Supply, Chippenham Town, April 2014

Core Strategy Requirement 2006-2026	Completions 2006-2014	Commitments April 2014	Residual requirement
4,510	995	1,579	1,936

Table 2: Employment Land Supply, Chippenham Town, April 2014

Core strategy employment land requirement	Completions 2006-2014	Employment commitments April 2014	Residual requirement
26.5 ha	0 ha	5.0 ha	21.5 ha

10. As part of the review of the proposals of the Plan it is important to base requirements on the latest published date which rolls forward the base date of the Plan to April 2015. This is set out in Table 1.3, below. The supply of employment land has not changed since April 2014

Table 3: Housing Land Supply, Chippenham Town, April 2015⁵

Core Strategy	Completions	Commitments	Residual requirement
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⁴ CSHG/01 Housing Land Supply Statement (April 2014), Wiltshire Council, July 2014

⁵ CSH5/08 Housing Land Supply Statement, April 2015 (published September 2015) Figures are rounded to the nearest 5

Requirement 2006-2026	2006-2015	April 2015	
4,510	1015	2,730	1,780

11. The list of commitments includes the saved local plan allocations are at Foundry Lane (Langley Park) and Cocklebury Road and sites which were subject to section 106 Agreement at April 2015 (Hunters Moon and North Chippenham. North Chippenham has since been granted permission on 12 February 2016)

Delivery of Brownfield and Windfall sites

12. In Wiltshire windfall is defined as unallocated development on previously developed land excluding residential gardens, which is consistent with the definition in the NPPF. At the housing market area (HMA) level an allowance for windfall development is included in housing land supply calculations, based on historic rates of delivery from this source of supply for both large (10 dwellings or more) and small (fewer than 10 dwellings) windfall sites.
13. The reliance on large sites to calculate the windfall allowance for the purpose of housing land supply is appropriate because, although different settlements will deliver large windfall sites at different times during the plan period, in combination they provide consistent rates of delivery at the HMA level. However, at the local community level, such as Chippenham, the delivery of large windfall development is less reliable.
14. The strategy of the North Wiltshire District Local Plan focused on the delivery of previously developed land to meet the housing requirement for the plan period to 2011. This approach included the allocation of brownfield land to provide 576 homes at Chippenham. However, as at April 2015, only 258 homes have been built on those allocated sites, which is a significantly lower rate of delivery than anticipated. The only remaining saved brownfield allocation at Chippenham is Foundry Lane for 250 dwellings, and which is already accounted for in the latest residual housing requirement for the town. The principal issue here is that there is no certainty that such sites will be developed. For example, an analysis of windfall sites permitted compared to sites promoted in the Strategic Land Availability Assessment (SHLAA) suggests that only 7-8% of the brownfield site permissions for the period since 2009 were included in the SHLAA.
15. Paragraph 48 of the NPPF says:
- ‘Local planning authorities may make an allowance for windfall sites in the five-year supply if they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply. Any allowance should be realistic having regard to the Strategic Housing Land Availability Assessment, historic windfall delivery rates and expected future trends, and should not include residential gardens.’*
16. National policy indicates that it may be appropriate to include an allowance for windfall sites when calculating a 5 year supply of housing but does not indicate that it is necessary in terms of plan making.

17. Representations to the draft Chippenham Site Allocations Plan have questioned this approach believing that an allowance should be made for small windfall sites before considering specific strategic site allocations. A number of brownfield sites have been referred to as offering potential for housing within Chippenham, which are discussed briefly below.

Police Station

18. A small site which may be suitable for a range of land uses compatible to its central location.

Langley Park

19. A saved policy in the WCS, which anticipates 250 homes coming forward and is already included as a commitment in the housing land supply data. There are renewed discussions about the potential of the area for development to include a mix of land uses appropriate to a central location including some additional housing.

Middlefields School

20. Declared surplus to requirements by Wiltshire Council this is currently being promoted as a mixed use site and could include some housing.
21. Each site is suitable for a number of uses and there is no certainty about the level of housing that these sites would contribute towards supply. The 'at least' 4510 homes requirement provides the flexibility for some homes to be included in each site should this be the right approach. For small windfall sites the picture is generally more consistent at the local level. Based on historic delivery rates it can be assumed that a number of dwellings will be built within Chippenham on small windfall sites by redevelopment within the urban area. However, data shows this source of supply, to be quite modest and opportunities limited for Chippenham, despite the size of the settlement. Taking the historical rate of delivery on unallocated small brownfield sites that were permitted over the period 2009 to 2015 at Chippenham as an indication of future small site delivery at the town, indicates that approximately 160 homes could come forward, which is not significant.
22. The WCS states that "the limited opportunities for the redevelopment of brownfield sites in Chippenham mean that it is necessary to identify Greenfield sites on the edge of town." (paragraph 5.46, WCS). The Council considers that the above evidence reinforces this point and that, for Chippenham an additional allowance for brownfield land is not justified in this plan.
23. Given the unpredictability of this source of supply and the limited contributions historically developed at Chippenham no deduction has been made to the residual housing requirement to be identified through strategic site allocations. By seeking to meet the remainder to be identified to meet plan requirements, through the allocation of strategic sites on the edge of the town, the Chippenham Site Allocations Plan can better ensure a supply of deliverable land and the flexibility to meet demand.

The Core Policy10 Criteria

24. The WCS also establishes a set of six criteria to guide the town's expansion (Core Policy (CP) 10 criteria) as set out below:

1. The scope for the area to ensure the delivery of premises and/or land for employment development reflecting the priority to support local economic growth and settlement resilience
2. The capacity to provide a mix of house types, for both market and affordable housing alongside the timely delivery of the facilities and infrastructure necessary to serve them
3. Offers wider transport benefits for the existing community, has safe and convenient access to the local and primary road network and is capable of redressing traffic impacts, including impacts affecting the attractiveness of the town centre
4. Improves accessibility by alternatives to the private car to the town centre, railway station, schools and colleges and employment
5. Has an acceptable landscape impact upon the countryside and the settings to Chippenham and surrounding settlements, improves biodiversity and access and enjoyment of the countryside
6. Avoids all areas of flood risk (therefore within zone 1) and surface water management reduces the risk of flooding elsewhere

25. These form the central basis for selecting 'strategic sites' expanding the town. A Strategic Site Assessment Framework⁶ has been developed to define how the CP10 criteria will be interpreted.

The Strategic Site Assessment Framework

26. Developed through consultation, the Chippenham Strategic Sites Assessment Framework (SSAF) sets out in more detail how each of these criteria are used. It lists elements by which an area or site should be assessed against each of the CP10 criteria, the rationale explaining why it is included and what evidence will be used to describe how well a site or area performs against that measure.
27. The Strategic Sites Assessment Framework will be the basis for the individual policy assessment of reasonable alternative strategic site options and is included at **APPENDIX 2** for information
28. A series of evidence papers describe the results of the evidence gathered in accordance with the Strategic Site Assessment Framework for each of the 'strategic areas' identified in the Core Strategy. Each provides evidence relevant to the six CP10 criteria.
29. The evidence papers therefore cover⁷:
- Evidence Paper 1: Economy

⁶ CEPS/18 Chippenham Strategic Site Assessment Framework, Wiltshire Council, December 2014

⁷

<http://www.wiltshire.gov.uk/planninganddevelopment/planningpolicy/chippenhamsiteallocationsplan/chippenhamplanprogramme.htm>

- 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

30. As stated above specific new evidence has been prepared to support the revised methodology and includes:

- Amended and enhanced Sustainability Appraisal Report
- Addendum to Evidence Paper 3: Transport and Accessibility Part 1 – Strategic Site Options
- Addendum to Evidence Paper 3: Transport and Accessibility Part 2 – Alternative Development Strategies
- Addendum to Evidence Paper 2: Housing and Community Facilities – Air Quality
- Viability Assessment of Strategic Site Options
- Letter from Environment Agency regarding the latest information on flood risk.

Strategic areas

31. The WCS identifies, diagrammatically, a set of strategic areas east of the A350 as potential directions for future expansion. The 'strategic areas' are defined by barriers such as main roads, rivers and the main railway line. Strategic sites will be allocated in one or more of the strategic areas.

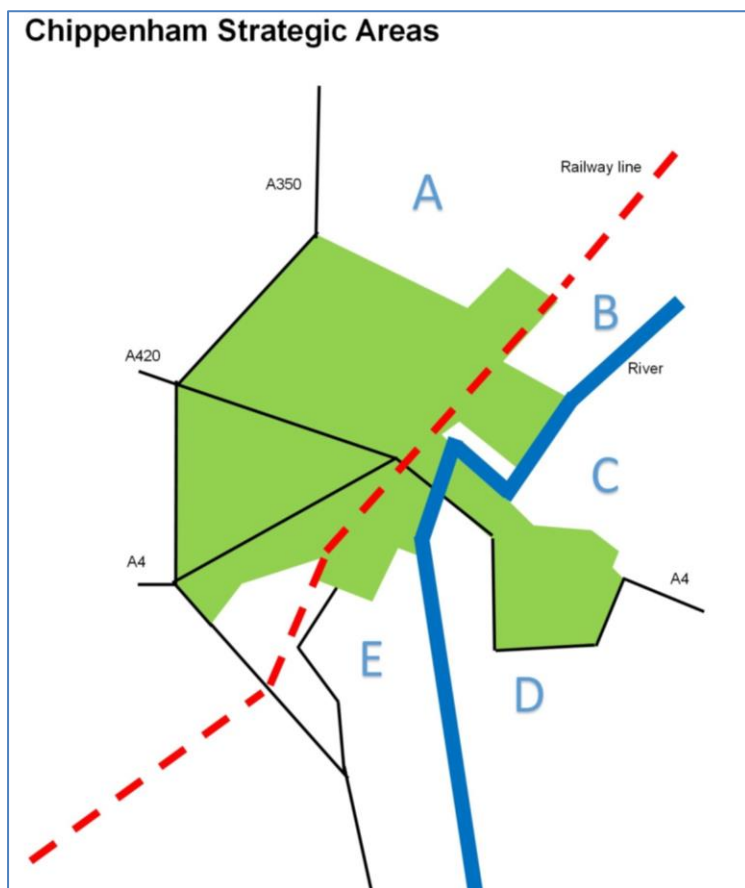


Figure 1: Chippenham Strategic Areas

32. The Core Strategy indicates that strategic sites will be east of Chippenham (strategic areas A – E, identified in the diagram above). Areas west of the Town have not been defined. The reasoning for this is set out in a briefing note explaining the selection of these strategic areas⁸

Planning Judgement

33. An approach to site selection must be transparent and rational. The Courts have considered criticism of approaches to plan making and have observed in one case that:
- “the necessary choices to be made are deeply enmeshed with issues of planning judgment, use of limited resources and the maintenance of a balance between the objective of putting a plan in place with reasonable speed (particularly a plan such as the Core Strategy, which has an important function to fulfil in helping to ensure that planning to meet social needs is balanced in a coherent strategic way against competing environmental interests) and the objective of gathering relevant evidence and giving careful and informed consideration to the issues to be determined” (Ashdown Forest Economic Development LLP and SoSCLG [2014] EWHC 406 Sales J)”

⁸ CEPS/13 Briefing note 2: Definition of the Chippenham Strategic Areas (Updated), Wiltshire Council, January 2015

34. The exercise of planning judgments is inevitable when selecting appropriate sites for development. In making such judgements the Council, as set out in sections 66 and 72 of the Listed Buildings and Conservations Area Act 1990, special attention is paid to the preservation of heritage assets. Judgements reported in this report are considered soundly based and on the evidence some sites are rejected and others taken forward. The approach is transparent and even-handed and consistent with the approach advocated in the Ashdown case.

Sustainability Appraisal and Strategic Environmental Assessment

35. Sustainability appraisal works alongside the Strategic Site Assessment Framework. Sustainability appraisal performs a similar task and reports on likely environmental, social and economic effects of the options in order to inform decision making. This work is being carried out independently to the council. A sustainability appraisal framework and a set of questions form the basis for reporting on each of the effects of the different options⁹ under consideration at each step: strategic areas, strategic site options and finally alternative and preferred development strategies.
36. The sustainability appraisal incorporates assessment and reporting on the environmental effects of different options as required by Strategic Environmental Assessment regulations¹⁰ for all plans and projects likely to have significant environmental effects.

⁹ CSUS/01 Wiltshire Housing Site Allocations DPD and Chippenham Site Allocations Plan Sustainability Appraisal/ Strategic Environmental Assessment Scoping Report, Atkins, August 2014

¹⁰ The Environmental Assessment of Plans and Programmes Regulations 2004

1. Step 1: Review Sustainability Appraisal of Strategic Areas

Objective: To improve the consistency and clarity of the Sustainability Appraisal of Strategic Areas A to E

Introduction

- 1.1 Each of the Strategic Areas has been assessed against the Sustainability Appraisal (SA) Objectives in the SA Framework (Table 6.1, SA Report¹¹). During the hearing sessions there was some concern about whether the assessments presented in Appendix 1 to the SA Report and summarised in Chapter 7 of the SA Report correctly reflected the evidence on which it relied.
- 1.2 There was no need to change the SA objectives. These remain the core objectives of the SA and derive from a scoping process involving public consultation. The previous appraisal of strategic areas has been reviewed for consistency and clarity. This included a review of decision aiding questions to ensure that they were appropriate to identify adverse impacts arising from development at Chippenham.
- 1.3 The SA identifies, for strategic areas, the likely significant effects of a large scale mixed use development, highlighting and explaining where the mitigation of impacts may be problematic.
- 1.4 In so doing, a context for carrying out this work is the requirements and safeguards derived from policies set out in the Wiltshire Core Strategy (WCS). Consistent with the National Planning Policy Framework, the WCS is the local expression of the sustainable development of the County.
- 1.5 No strategic areas are identified west of the A350. This choice is not considered to be a reasonable alternative location for a large mixed use site. A full explanation is provided in a separate briefing note, which comments that successive Strategic Housing Land Availability Assessments have shown overwhelming land owner and developer interest east of A350 and that options for development that involve breaching and building beside the A350 are much more difficult to achieve without compromising its strategic role. The A350 therefore represents a barrier to development and a logical boundary to the town.
- 1.6 The sustainability appraisal considers likely significant impacts from large scale mixed use development ('strategic sites') in the context of strategic areas A –E achieving an overall scale of development to be accommodated of at least 1,780 dwellings and 26ha of land for employment development (Use Classes B1, B2 and B8). This scale of residential development is in addition to land already committed at North Chippenham and Hunter's Moon. Strategic sites are required in addition to brownfield development and non-strategic sites for which an allowance has been made.

¹¹ CSUS/02 Sustainability Appraisal Report (February 2015) <http://www.wiltshire.gov.uk/chippenham-draft-sa-report.pdf>

- 1.7 Assessments of strategic areas considers potential for development both with and without possible link roads that connect the A4 and A350. This has a particular bearing on the likely impacts of development in Areas C and D. Land North of Chippenham (Area A) will be developed for up to 750 dwellings and includes a link road (a 7.3m local distributor road) and Area A has been assessed taking account of this proposal.
- 1.8 The SA objectives and summary findings from the report are set out below. The detailed considerations can be found in the Sustainability Appraisal Report : Sustainability Appraisal of Strategic Areas.

Summary of Sustainability Appraisal of Strategic Areas

- 1.9 The sustainability appraisal has identified a range of constraints and has come to the following conclusions about each area:

Area A

- 1.10 In terms of socio-economic SA objectives, Area A generally provides positive support for the housing and local economy SA objectives. There are, however, two constraints relating to inclusive and self-contained communities and promotion of sustainable travel choices. In particular, the constraints relate to non-motorised access to community facilities and the town centre but mitigation is considered achievable.
- 1.11 With regard to environmental SA objectives, the assessment results indicate marked constraints of problematic mitigation in relation to biodiversity and geological features and efficient use of land. Area A encompasses a number of important ecological resources, including two BAP priority habitats, Birds Marsh Wood County Wildlife Site as well as several protected species. The majority of land in the strategic area not covered by the approved application comprises BMV agricultural land, making mitigation through avoidance of BMV also problematic.
- 1.12 The eastern part of the strategic area is formed of land which contributes to the setting of a number of heritage assets and includes some landscapes with particular sensitivity. These constraints could be achievably mitigated through sensitive design, layout and landscaping which address the need to enhance or better reveal the settings of these assets. Other environmental constraints regarding water resources, air quality and environmental pollution and communities are also achievably mitigated. The constraint relating to mitigation of and vulnerability to climate change can be mitigated through reduced car dependency, carbon sequestration and design which minimises carbon emissions during construction and operation.
- 1.13 Regarding sustainable transport, the Area is well situated in relation to the PRN with the A350 adjoining the western boundary of the Area, and affords good access to the existing principal employment site to the east. The Area has moderate non-motorised access to the town centre. Relative ease of access to the M4 corridor from this Area may encourage longer distance commuting and road transport focused employment development, which may result in lack of integration with the town centre. These factors combined indicate strong potential for marked reliance on motorised transport from development in the Area, with the risk of exacerbating

congestion and associated air quality and noise issues on the B4069 route to the east and the town centre. In order to alleviate congestion public transport improvements would have to bring about a substantial modal shift. This mitigation is considered achievable.

- 1.14 The best performing part of the Area comprises that already covered by the approved application. Improvement to the existing public transport network will be required as part of the approved application and there is potential for the approved application to extend existing bus routes to serve the area. The B4069 would serve the Area well as a future public transport corridor. Any development in the Area should also seek to appropriately integrate with the link road proposed in the approved application to support optimal access to the PRN, the town centre, existing employment sites and key facilities.

Area B

- 1.15 With regard to socio-economic SA objectives, Area B generally provides positive support for the housing and local economy SA objectives. There is, however, one constraint related to the promotion of sustainable travel choices to employment areas. Improvements to public transport network in Chippenham would be needed to support employment development at Area B. This mitigation is considered achievable.
- 1.16 The assessment results indicate that development in Area B is subject to a number of environmental constraints. The extent of BMV agricultural land, which is considered too extensive to adequately mitigate through avoidance, is deemed problematic. None of the other environmental constraints are deemed problematic to mitigate. Constraints in Area B concern biodiversity, efficient and effective use of water resources, mitigation of and vulnerability to climate change, heritage assets and the quality of urban and rural landscapes. Biodiversity constraints include the River Avon CWS which can be avoided. Mitigation of effects from development in an Outer SPZ is considered achievable, as are mitigation of impacts on and vulnerability to climate change through building design, carbon sequestration and reduced focus on the private vehicle. Constraints associated with heritage relate to land which contributes to the setting and character of Langley Burrell and Tytherton Lucas Conservation Areas and listed buildings at Rawlings Farm and Upper Peckingell Farm. Additionally visual effects of development in Area B on the rural landscape, particularly in terms of the setting of the village of Tytherton Lucas, are of problematic mitigation.
- 1.17 Regarding sustainable transport, the assessment for Area B indicates the northern and eastern parts of the Area are constrained in relation to the weak ease of access to community facilities and services but that these constraints would not be problematic to mitigate. The southern and western parts of the Area enjoy good access to the town centre and existing employment areas, in terms of non-motorised movement. However, access to the PRN is generally weak and would likely entail routing through the town centre, as well as increasing pressure on the already congested B4069. The approved application in Strategic Area A comprises a strategic link road which would improve access from Area B to the PRN.

- 1.18 The close proximity to the town centre as well as an existing principal employment site presents a strong opportunity in the south and west of the Area to encourage more compact development focused on non-motorised movement routes, with close attention to ecological and landscape integration. However, this would need to be supported by improved public transportation services using the B4069 corridor in order to avoid increases in vehicle traffic, as well as good quality well integrated employment opportunities and increased provision of community services. Improving access from this Area to Abbeyfield School would require a new river crossing.

Area C

- 1.19 Area C provides support for socio-economic SA objectives relating to housing and long-term sustainable economic growth. Additionally, a number of constraints are identified with regard to accessibility, including weak access by public transport and non-motorised modes to proposed employment development as well as access to community facilities and services but these are considered of achievable to mitigate.
- 1.20 The Area does not perform well in relation to the environmental SA objectives as it exhibits two constraints which might prove problematic to mitigate against (land efficiency and air quality and environmental pollution). The extent of BMV land in Area C makes strategic mixed-use development in this Area problematic to mitigate as BMV cannot be avoided. The main access to the PRN and the town centre is via the already congested A4. Environmental pollution is a constraint considered problematic to mitigate as development of Area C would increase air and noise pollution along the A4 into Chippenham. A large proportion of the central, northern and eastern parts of the Area is characterised by moderate to poor access to the town centre, existing employment areas and services, and public transport provision. Improved public transport provision on the A4, and fostering of close integration of non-motorised movement routes, development of the south western and southern parts of the Area offer the best mitigation for the environmental pollution issues identified but it is considered that this will not be sufficient to mitigate satisfactorily the significant adverse effects identified.
- 1.21 Other constraints in relation to the environmental SA objectives where mitigation is considered achievable include the River Avon CWS biodiversity feature and the outer SPZ which comprises much of the Area, the presence of Tytherton Lucas Conservation Area and impacts on and vulnerability to climate change. Development in subareas in proximity to the town centre could reduce dependency on cars and reduce emissions, and in doing so mitigating the latter constraint. However, this would encourage development in proximity to the River Avon Floodplain where land is vulnerable to flooding and this would have to be taken into account in development proposals. Mitigation of effects on Tytherton Lucas Conservation Area is achievable through avoidance of certain subareas, similarly avoidance of most visually prominent land would mitigate the constraint on the visual amenity and character of the rural landscape.

Area D

- 1.22 With regard to socio-economic SA objectives the Area provides positive support for the housing and local economy SA objectives, namely providing good quality affordable housing and encouraging long term sustainable growth. Otherwise there are constraints relating to the provision of high quality employment land with strong public transport and non-motorised access. Neither of these are considered problematic to mitigate.
- 1.23 Similar to Area C, assessment against environmental SA objectives indicates constraints deemed problematic to mitigate relating to efficient use of land, due to the extent of BMV land, and air quality and environmental pollution due to the northern part of the Area's proximity to the A4. Furthest overall from the town centre and existing employment sites, access to/from Area D is reliant on the already congested A4 which borders the north of the Area and this will exacerbate existing air quality and environmental pollution issues. Accessibility via public transport or non-motorised modes is considered generally weak over much of the Area, although the north east of the Area has good non-motorised access to Abbeyfields secondary school. Development of the northern part of the Area, in particular the north east, offers the best potential performance in terms of likely significant effects. However, this would require improvement to public transport services to reduce potential negative effects on the A4 corridor and town centre as well as low car ownership/car free type of development, but it is considered that this will not be sufficient to mitigate satisfactorily the significant adverse effects identified.
- 1.24 The assessment results indicate a number of constraints against environmental SA objectives deemed achievable to mitigate through avoidance. The Area is partially situated within a Minerals Safeguarding Area. There are a number of important biodiversity features in the Area, in particular associated with riparian and woodland habitats, the linear nature of which makes severance an issue. Bordered in the west and south by the River Avon, flood risk and drainage issues are constraints in these and adjacent parts of the Area. The more remote, rural landscape in the south of the Area, and the setting of some heritage assets in the northwest, pose constraints to development in these areas. Mitigation of adverse effects on the settings of Rowden Conservation Area is achievable through the introduction of buffer zones. The constraint relating to mitigation of and vulnerability to climate change can be mitigated through reduced car dependency, carbon sequestration and design which minimises carbon emissions during construction and operation.

Area E

- 1.25 The assessment results indicate that development in Area E would support the socio-economic SA objectives relating to housing and providing for long-term sustainable growth. The results also indicate no constraints on the socio-economic objectives relating to sustainable transport choices for new employment land and providing high quality employment land.
- 1.26 Only one constraint deemed problematic to mitigate is identified through the assessment, this relates to the environmental SA objective: efficiency of land use.

The extent of BMV land in the Area would prove problematic to mitigate through avoidance.

- 1.27 The assessment results indicate that remaining environmental SA objectives pose constraints deemed achievable to mitigate. Biodiversity features, including the River Avon CWS can be avoided by development in Area E, similarly there is sufficient Flood Zone 1 land in the Area for development to avoid Flood Zones 2 and 3, the Mineral Safeguarding Area can be avoided and mitigation of adverse effects on the settings of Rowden Conservation Area is achievable through the introduction of buffer zones. The constraint relating to mitigation of and vulnerability to climate change can be mitigated through reduced car dependency, carbon sequestration and design which minimises carbon emissions during construction and operation.
- 1.28 The Area combines good access to the A350 in the southern part, and strong access to existing public transport corridors (B4643), the town centre and existing employment areas in the northern part. The majority of the Area has moderate to weak access by non-motorised modes of transport to secondary schools with the north of the area performing best. Identified air quality and environmental pollution issues are deemed achievable to mitigate.
- 1.29 There is a strong opportunity in the north of the Area to encourage more compact development focused on non-motorised movement routes which directly link into the nearby town centre, capitalising on the good network of existing PRoWs. Encouraging development of high quality employment opportunities, particularly less motorised transport focused businesses, with close integration with the public network, would help establish such an area as more self-contained and less reliant on highway linkages, helping to reduce traffic pressure on the A4, where bus services could be increased, and ameliorate associated congestion, air quality and noise issues. Compact, human-scale development, with a strong emphasis on low car or car free movement, in the northern part of Area E should also help facilitate sensitive approaches to the Rowden Conservation Area setting and context.

2. Step 2: Policy review Strategic Area Assessments

Objective: To present the existing policy analysis of strategic areas against the objectives of the Plan to clarify the differences between each.

Introduction

- 2.1 Informed by SA, step 2 presents the evidence of the most significant strengths, weaknesses, opportunities and threats for each strategic area (A to E).
- 2.2 This is done using the six criteria from Core Policy 10 of the Wiltshire Core Strategy (which are consistent with the Plan objectives) and evidence requirements set out in the Strategic Site Assessment Framework, this assessment reports under each criteria as follows:

Strength: There would be a benefit from developing here because...

Weakness: There would be harm from developing here because...

Opportunity: Developing here would offer the wider benefit of...

Threat: Developing here would risk the wider harm of...

- 2.3 An assessment had already been presented in the Site Selection Report , February 2015, in a narrative manner. This assessment replaces that work and reflects on amendments to the SA of Strategic Areas and presents the evidence in a manner which better highlights the differences between Strategic Areas.

- 2.4 Each criterion is considered in turn using the template below:

Criterion 1:	The scope for the area to ensure the delivery of premises and/or land for employment development reflecting the priority to support local economic growth and settlement resilience							
Strategic Area	Strength		Opportunity		Threat		Weakness	
A	←		Description of strength - there would be a benefit from developing here because...					
B								
C			←		Source of evidence: Such as EP1-7 and Strategic Site Assessment Framework			
D								
E								

Figure 2.1: SWOT Template

- 2.5 The section does not conclude with a preference for one Strategic Area over another. No Strategic Area is removed from further consideration. The section:
- highlights likely characteristics of each area that influence site selection, culminating in a concise summary of each area's key distinguishing features; and
 - considers the interdependencies of strategic areas and how in combination they may deliver the objectives of the Plan culminating a set of development concepts.

- 2.6 The likely strengths and weaknesses of different potential combination(s) of Strategic Areas are considered to inform potential development concepts. Concepts take into consideration opportunities for strategic infrastructure suggested in existing evidence papers that could address problems facing the town. These then inform the development of alternative development strategies (see Step 6).

Summary of distinguishing strategic area characteristics

- 2.7 A high level analysis of each strategic area highlights the following key differences between the areas. The full assessment is contained at **APPENDIX 3**:
- A Well-related to the A350, scope for further development beyond that already committed is highly constrained by the need to protect Birds Marsh Wood and concerns about heritage impacts.
- B The most prominent of all the areas in the wider landscape. Particular characteristics are associated with its location; good access to the town centre, potential to provide a Cocklebury Link Road but close to already congested transport corridors. Concerns about heritage impacts
- C Area C is separated from the built up area by the River Avon. Development would need to avoid unacceptable visual impacts upon the character and setting to the villages of Tytherton Lucas and East Tytherton. A developable area abuts the most extensive tracts of land at flood risk, directly upstream of the town, but this also offers the possibility of reducing flood risk.
- D The most isolated area; by the River Avon but also from the main built up area of the town and distant to the centre. Visually prominent from surrounding high ground, development could make this edge of Chippenham considerably more notable in the surrounding countryside.
- E A main feature of this Area is Rowden Conservation Area. Well-related to the A350 it performs comparatively well in terms of transport and landscape impacts. The single area that can deliver attractive land for employment development early in the plan period.

Strategic area interdependencies

- 2.8 Transport assessment has analysed the interdependencies of strategic areas. It summarised the relationship of strategic areas using a 'dependency matrix'.
- 2.9 The matrix uses a three-point scale to identify the transport and accessibility dependencies which are likely to exist: little or no dependency (indicated by a '-' symbol); partial dependency; and high dependency.
- 2.10 Partial dependency implies that much of the Strategic Area is likely to be dependent on development taking place in another Strategic Area. High dependency implies that nearly all of the Strategic Area is likely to be dependent on development taking place elsewhere. Where little or no dependency is shown in Table 7-1 (indicated by a '-' symbol), this should only be taken as indicative.

Strategic Area Dependency Matrix

Strategic Area Y is...	Dependent On Strategic Area X (in transport and accessibility)					Dependency Summary for Strategic Area Y
	A	B	C	D	E	
A		-	-	-	-	-
B	Partially		-	-	-	Partial
C	Highly	Highly		-	-	High
D	-	-	-		Highly	High
E	-	-	-	-		-

The report comments on the table as follows:

“The peripheral (north-eastern) parts of Strategic Area B are likely to be dependent on development taking place in Strategic Area A, to provide a suitable highway connection to the A350 (the PRN). 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;”

Most of Strategic Area C is likely to be dependent on development taking place in both Strategic Areas A and B. Again, this is to provide a suitable highway connection to the PRN via an eastern link road across the River Avon and railway line. Without this link road in place, nearly all traffic to or from Strategic Area C would need to route through or around Pewsham, and through Chippenham town centre. Although this dependency has been identified, it may be viable to develop limited southern parts of Strategic Area C as an extension to Pewsham; and

Most of Strategic Area D is likely to be dependent on development taking place within Strategic Area E, to provide a suitable highway connection (a southern link road) across the River Avon to the PRN at Lackham. Without this link road, nearly all traffic to or from Strategic Area D would need to route along the A4 around Pewsham, and through Chippenham town centre. As with Strategic Area C, it may be viable to develop limited parts of the area as an extension to Pewsham.”

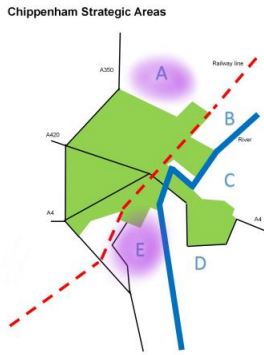
- 2.11 At this high level of assessment, it is only possible to note the need for the Plan to co-ordinate provision of road infra-structure involved in the development of strategic areas because they are, to some degree at least, dependent on other strategic areas. Likewise, the degree to which development is able to afford the necessary infrastructure and provide for all other costs including a proportion of affordable housing has not been determined.
- 2.12 Recognising the dependencies involved in the development of different strategic areas forms a basis for a choice of concepts for a future pattern for the town’s development.

Potential development concepts

- 2.13 A summary of strategic area characteristics shows that none of them contain constraints that exclude them from being an area of search for strategic sites. Although four areas contain flood zones 2 and 3, there is the ability to avoid these areas by solely using developable land in zone 1, in accordance with the sequential approach contained in the National Planning Policy Framework. This is a view supported by sustainability appraisal.
- 2.14 The amount of land potentially available in each of the areas suggested by Strategic Housing Land Availability Assessment viewed alongside the nature and number of constraints impinging upon them shows that no one area can accommodate all the development envisaged in the Plan period.
- 2.15 Even if it were not a necessity a choice of locations would help achieve anticipated rates of growth, bearing in mind national policy to significantly boost housing supply. Crucially a choice of locations would also provide a range of opportunities for business and be a good way to ensure the town capitalises on its locational advantages.
- 2.16 The longer term consequence of a choice of development strategy needs to be considered as a part of proposing a sustainable pattern of development. Meeting today's needs should not prejudice the ability of future of future generations to meet their needs.
- 2.17 Land requirements for development will need to be met in more than one strategic area. A central strategic question for the Plan is therefore what represents the most appropriate pattern of development.
- 2.18 The primary plan objective of the Plan is to deliver substantial job growth. Evidence also suggests that the current supply of land for potential business development is limited and that there is an immediate need for more to be made available. Areas A and E represent the possibility of more immediate access to the A350 in locations attractive to investment; an approach which very clearly accords with economic strategy for the County expressed by the Local Economic Partnership.
- 2.19 The WCS also requires that the Plan consider how a pattern of development may solve strategic infrastructure problems facing the town. Transport assessment shows that it will be difficult to accommodate the impact of the additional traffic arising from growth. In particular growth threatens to add to existing congestion around the town centre. Unmanaged, growth might well undermine a central objective of the WCS which is to deliver substantial job growth in large part by the regeneration of the town centre.
- 2.20 The scales of development involved as a part of strategic sites means they will each need more than one point of vehicle access. This is a particular issue for Strategic Areas B, C and D where access would also need to be achieved by new bridges; in the case of Area B, across the railway, Area D across the River Avon and Area C both the railway and River Avon. These elements involve added complexity and costs to a pattern of development in which they are involved.

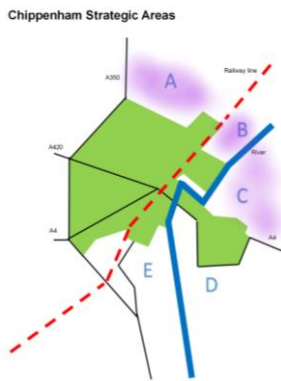
- 2.21 The two access points required for Areas C and D do however open the opportunity to eventually connect the A4 to the A350 with a new road, not to provide a bypass to the town, but to help manage the traffic generated by growth and prevent detriment to the regeneration prospects of the town centre.
- 2.22 Necessary to enable the development of Area B, access arrangements could also allow provision of a link road that can be used as a second access point to the Monkton Park area of the town, which forecasts say would benefit current traffic conditions.
- 2.23 Initial transport assessment has compared three overall development scenarios (1) a dispersed pattern (2); north/east focus; and (3) a southern focus. Scenario 2 includes an Eastern Link Road connecting the A4 and A350, scenario 3 a Southern Link Road, makes the same connection. This work concluded:
- “Scenario 1: A dispersed development scenario without full link roads is forecast to lead to the most congested conditions on the Chippenham highway network, using ‘average journey time’ and ‘time spent queuing’ as a proxies for congestion;*
- Scenario 2: A north/east development focus, with eastern link road, is forecast to lead to average journey times which are approximately 30-50% shorter than journey times under Scenario 1, or 15-20% shorter than under Scenario 3. Time spent queuing on approaches to The Bridge Centre is also forecast to be considerably lower than it is under both Scenarios 1 and 3; and*
- Scenario 3: A southern development focus, with southern link road, is forecast to lead to average journey times which are approximately 15-40% shorter (depending on the time of day) than journey times under Scenario 1. However, journey times under Scenario 3 are 20-25% longer than those under Scenario 2.”*
- 2.24 There are a number of different combinations of strategic areas that can be termed ‘development concepts’. They encompass those above and are summarised below. Each of these represents, in very broad terms, a different pattern for Chippenham’s long term growth, without considering sites in detail or what scale and rate of development they may each be capable of delivering.

Concept 1: Employment based (A and E)



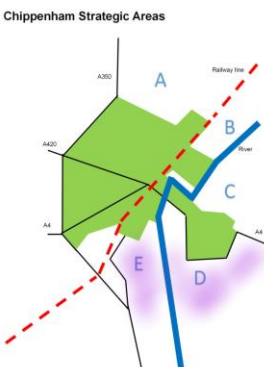
Why this combination? Areas adjoin the A350 and provide the best predictable journey times to the M4. They require the least road infrastructure investment and can therefore provide land needed urgently for employment reasonably quickly. Their locations are the most attractive in terms of wider market appeal to inward investment

Concept 2: An Eastern Link (B and C)



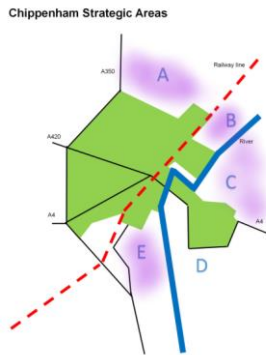
Why this combination? A northern arc of development can provide an eastern link road, described in transport evidence as the Eastern Link Road through Strategic Areas A, B and C is proposed as the key piece of transport infrastructure required to unlock the town's long term development potential. It links to road infrastructure already committed as a part of development in Area A

Concept 3: A Southern Link (D and E)



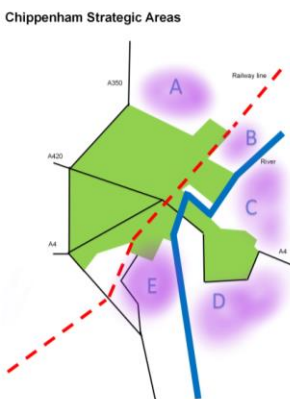
Why this combination? Area E provides more immediate land for employment development, unlike concept 2, and a Southern Link Road by connecting the A4 to A350 via Area D that offers traffic relief, but not as much as an eastern route. Its route however would not necessitate a crossing over the railway.

Concept 4: A mixed approach (B, C and E)



Why this combination? Area E provides for immediate land for employment development, as per concept 3, but also the greater benefits forecast from an Eastern Link Road, as per concept 2.

Concept 5: A dispersed approach (A-E)



Why this combination? Market-led, this pattern of development provides greater certainty over delivery and offers choice. It would also be likely to provide for employment development in Area E and/or A. It might however, preclude or substantially delay provision of a link road either south or east.

- 2.25 Each development concept has advantages and disadvantages. The concepts provide a tool for the Council to go on to select strategic site options that together combine to form more detailed alternative development strategies that it can then test thoroughly and compare fairly (See Step 6 below).

3. Step 3: Identify Strategic Site Options

Objective: To identify reasonable alternative strategic site options in all Strategic Areas (A to E)

Introduction and Background

- 3.1 The objective of Step 3 is to identify reasonable alternative strategic site options in all Strategic Areas (A to E). The additional work will ensure that all reasonable alternative strategic site options have been considered, in addition to those already examined in the previous Site Selection Report (February 2015) in Strategic Areas E, B and C. Identification of strategic site options is extended to include strategic site options in strategic areas A and D and, potentially, additional options in Strategic Areas E, B and C.
- 3.2 The methodology used to create strategic site options is explained below followed by the results of applying it to each strategic area. The objective has been to identify reasonable alternatives for assessment by both the sustainability appraisal and policy assessment to help inform the selection of a preferred development strategy for the Chippenham Site Allocation Plan (CSAP). It is not an objective to identify all possible alternative strategic site options.
- 3.3 The guiding principles are to identify those sites that appear to be 'available', 'suitable' and 'achievable' in accordance with the National Planning Policy Framework (NPPF)¹². Availability is led by evidence from the Strategic Housing Land Availability Assessment (SHLAA). As an example, a consideration with regard to 'suitability' could be evidence on landscape impact
- 3.4 'Achievability' is more difficult to assess at the outset of the process. The NPPF considers sites to be developable when they are in a suitable location, there is a reasonable prospect of delivery and could be viably delivered¹³. At this stage in the process 'achievable' is linked to whether there is a reasonable prospect of delivery. For example it may be possible to identify barriers to delivery such as ownership constraints.
- 3.5 The methodology, set out below, uses these principles to review the SHLAA sites and create reasonable alternative strategic site options. The Schedule of Work submitted to the Inspector envisaged taking reference from the Planning Advisory Service (PAS) strategic site toolkit¹⁴ to also inform the process. Instead direct support was sought from PAS to challenge and inform the process and has informed the methodology and approach explained below

¹² CNNP/01 NPPF Footnote 11 states: To be considered deliverable, sites should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years and in particular that development of the site is viable. Sites with planning permission should be considered deliverable until permission expires, unless there is clear evidence that schemes will not be implemented within five years, for example they will not be viable, there is no longer a demand for the type of units or sites have long term phasing plans.

¹³ CNNP/01 NPPF Footnote 12

¹⁴ PAS guidance: allocating sites <http://www.pas.gov.uk/pas/core/page.do?pagelId=469051#contents-3>

Methodology and Approach

What is a Strategic Site?

- 3.6 Briefing Note 5: The Role of Strategic Sites prepared to support the CSAP clarifies that:
- “Strategic sites are major developments that deliver a mix of uses, critically, local employment as well as homes, but also infrastructure (for example: primary schools; community facilities; formal and informal recreation facilities; and often local shops and services). This infrastructure is 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).¹⁵”*
- 3.7 In identifying reasonable strategic site options Step 3 seeks to identify appropriate site boundaries. The process also identifies a possible combination of areas for green space, employment land and residential development for each site to give an indication of a developable area, and thus potential site capacity particularly for employment and residential uses. Site options do not list the full range of different uses that may be possible within an option simply these key elements. Roads and where access to the site might be suitable are discussed alongside each option. The indicative areas are to inform the Step 4 (Sustainability Appraisal (SA)) and Step 5 (Policy) assessments that will follow. For example, understanding that areas at risk from flooding will be excluded from the developable area affects the assessment of SA objective 3 (Use and manage water resources in a sustainable manner).
- 3.8 Indicative areas are provided as a guide only. They are likely to be refined further as preparation of the Plan progresses (for example indicating areas required for new schools) to better inform successive steps in plan preparation culminating in specific proposals of the Plan. Thereafter, sites will be subject to master planning that will involve more detailed work as part of the planning application process that could introduce different ideas from these very first ones.

Strategic Housing Land Availability Assessment

- 3.9 The Council's assessment of land availability includes the Strategic Housing Land Availability Assessment (SHLAA), as set out in the National Planning Policy Framework¹⁶. This assessment identifies a future supply of land which may be suitable, available and achievable for housing and economic development uses.
- 3.10 As stated above, the SHLAA provides evidence of what land is being promoted at Chippenham and is therefore potentially available for development in each of the Strategic Areas. It identifies sites and broad locations with potential for development and provides a basic assessment of development potential and

¹⁵ CEPS/16 Briefing Note 5: The Role of Strategic Sites, paragraph 1.1
<http://www.wiltshire.gov.uk/planninganddevelopment/planningpolicy/chippenhamsiteallocationsplan/chippenhamcommunityengagement.htm>

¹⁶ CNNP/01: National Planning Policy Framework

suitability. Paragraph 159 of the National Planning Policy Framework¹⁷ states that Local Authorities should:

“... prepare a Strategic Housing Land Availability Assessment to establish realistic assumptions about the availability, suitability and the likely economic viability of land to meet the identified need for housing over the plan period.”

- 3.11 The opportunity to submit land to the SHLAA was highlighted as part of the initial Regulation 18¹⁸ consultation on the Chippenham Site Allocations Plan in 2014 and has remained open for land to be added to the data base since. Mapping of submitted SHLAA sites is undertaken regularly, with the latest mapping completed in 2015 and includes all sites submitted in responses to the pre-submission consultation on the draft CSAP. Consequently, using the mapped SHLAA sites forms a comprehensive foundation for producing strategic site options.
- 3.12 Land parcels submitted for inclusion in the SHLAA range in size from several hundred hectares to single figures. As a consequence some strategic site options may involve a combination of separate land interests whilst others may need to be divided or reduced. Land submitted for consideration at Chippenham is shown below:

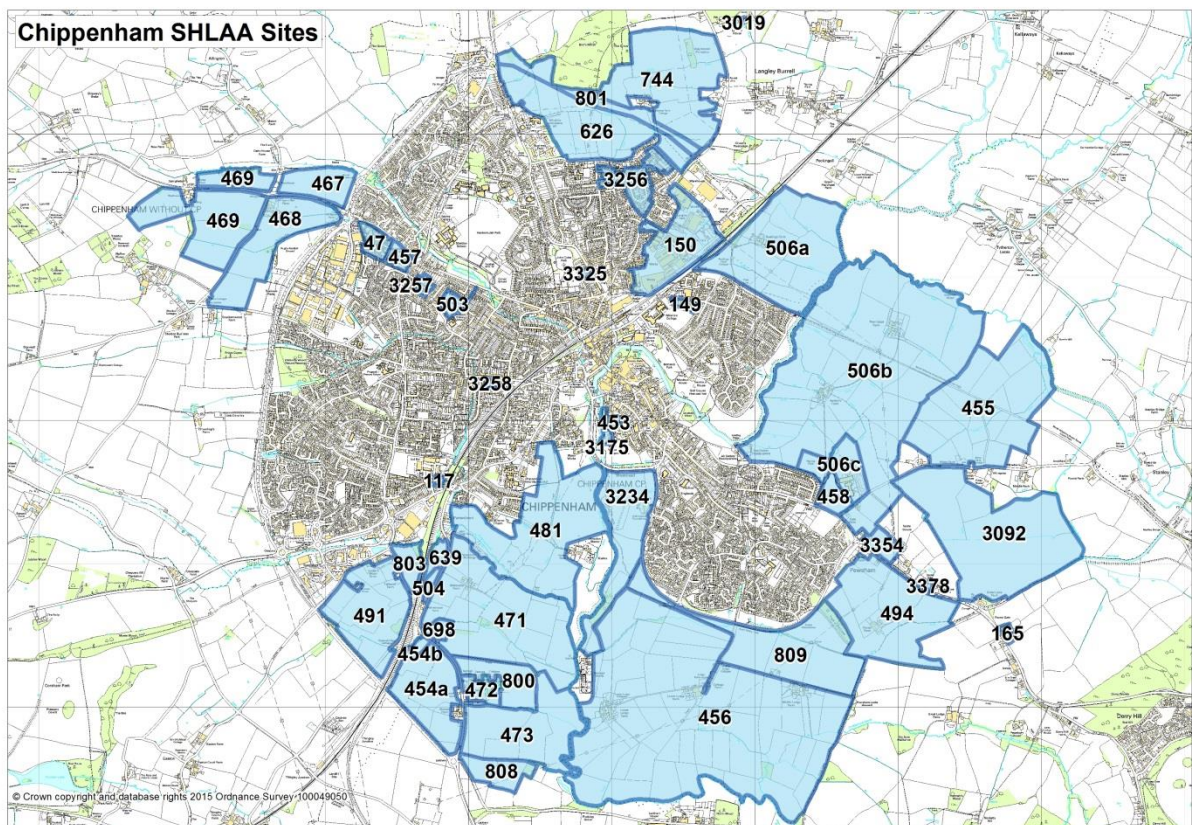


Figure 3.1: Submitted SHLAA sites in Chippenham

¹⁷ CNNP/01 National Planning Policy Framework

¹⁸ CCON/10 Chippenham Scope of the Plan Consultation Regulation 18 report

Creating individual strategic site options

- 3.13 Each strategic area has been considered individually resulting in a number of possible strategic site options representing one or more aggregations of SHLAA sites. The variety of SHLAA sites in each area generates different numbers of options depending upon how they may be amalgamated.
- 3.14 Land parcels submitted for inclusion in the SHLAA also range in size from more than a hundred hectares to single figures. As a consequence, to create realistic strategic site options some large SHLAA sites may need to be divided or reduced.
- 3.15 The basis for creating reasonable alternative strategic site options is as follows:

A. Developable - land ownership

As a minimum, a site option must be considered developable, in a suitable location for housing development and there should be a reasonable prospect that the site is available and could be viably developed¹⁹.

Single ownership of an option provides greater certainty in relation to deliverability whilst, in contrast, multiple site ownership may create barriers to delivery when, for example, agreements about ransoms and equalisation of value need to be achieved. Land ownership is therefore a factor in the creation of reasonable strategic site options. Consequently it would be preferable to identify site options with as few different owners as possible, unless the owners are all in agreement and willing to proceed.

Some sites are the subject of *current planning applications or submissions* as part of the CSAP process. Therefore in generating strategic site options consideration has been given to these proposals to reflect known aspirations and provide a clear and open assessment of each.

B. Suitable - Natural and man-made features

Some SHLAA sites are extremely large and ill defined. In these circumstances it may be necessary to redefine the site using natural and man-made features. An example would be to the south of Pewsham Way where particular landscape thresholds identified in Evidence Paper 4: Landscape Assessment could be breached which would otherwise rule out the site in its entirety. Features could include woodland, hedgerows, topography, roads and pylons.

¹⁹ CNNP/01 National Planning Policy Framework, footnote 12, DCLG, March 2012

C. Achievable - scale of development

The focus of the Chippenham Site Allocations Plan in accordance with Core Policy 10 (CP10) of the Wiltshire Core Strategy is to identify strategic mixed use sites for businesses, new homes and the infrastructure necessary to support them.

Strategic site options, therefore, need to be of sufficient scale to deliver development that is capable of being in accordance with the CP10 criteria. SHLAA sites judged not capable of delivering an appropriate scale of growth in isolation will be considered in combination with other adjacent SHLAA sites to create a strategic site option. Some combinations of SHLAA sites may also far exceed strategic requirements and prejudice development decisions best taken in future plan-making cycles.

3.16 Given the number of SHLAA sites in some strategic areas there are a multitude of different combinations of sites which could form a strategic site option. However, the objective is to identify reasonable alternatives not every alternative. To help focus on reasonable alternative site options, in addition to the three core objectives above (paragraph 3.15), a site should adhere to the following principles. These have been used as a guide to provide a logical sequence to the release of development and to help highlight site option choices:

- Development will proceed outwards from the existing urban edge
- Each strategic site option needs to be sufficiently different to enable a judgement to be made about its performance against the CP10 criteria. Ultimately the plan preparation process must make a judgement between strategic site options to inform the preparation of alternative development strategies it is therefore important that the key differences between options are clear at this stage. For example, a strategic site option only 100 homes different from another in predominately the same location is unlikely to identify any significant differences compared to site options that test how far a site extends into the open countryside.
- For each strategic site option a judgement has been made on the developable area to give an indication of the scale of development that could be achieved. The indicative plans exclude land which is liable to flood as greenspace. The approximate number of homes that can be delivered within the developable area will be based on the density assumptions included in the SHLAA i.e. 30 dwellings per hectare. This will enable all sites to be considered on a level basis. It is also a factor that will help determine whether a significant portion of an individual site can be deliverable within the Plan period and will not result in excessive levels of development beyond the Plan period. At this stage in the process this may lead to differences between the assumed housing numbers on site for the purpose of this assessment and numbers submitted as part of a planning application. Where assumptions for individual sites differ from a submitted application this is explained.

Employment Led Strategy

- 3.17 The strategy for Chippenham is employment led and so therefore the capacity for site options to deliver land for business development is a key consideration in the selection process. It is recognised in paragraph 6.46 of Evidence Paper 1²⁰ that the poor viability of commercial development in Wiltshire means only a limited supply of completed new build investment opportunities will be brought to the market over the next few years. Large mixed use schemes are sought through the allocation of strategic sites, in order to bring forward the required employment land to meet the needs of businesses²¹.
- 3.18 NPPF paragraph 21 highlights a role for Local Plans to identify strategic sites for local and inward investment. Planning Advisory Service (PAS) advice has noted that incorporating strategic sites within a local plan is intended to ensure that more certainty is given to the delivery of objectives and therefore the success of the Plan. PAS guidance notes on the inclusion of strategic sites in local plans suggests the decision about what classes as a strategic site should be based on the significance of the site to delivering the vision of the plan. There was no size or capacity threshold to determine whether a site should be included within the Wiltshire Core Strategy: inclusion was based on the significance of the site to the delivery of the overall strategy for Wiltshire in accordance with this advice.
- 3.19 The average size of employment allocation on allocated strategic sites in Wiltshire is 7.5ha. This is based on total area of land allocated for employment divided by the number of sites but they ranged in size from about 3 hectares to 15 hectares. This reflects the need to provide a variety of site locations and site size to cater for different business needs. Effectively the size of employment area as part of large strategic allocations in the Wiltshire Core Strategy was determined by the location, topography and the nature of businesses likely to be attracted to the area.
- 3.20 Bearing in mind the importance in terms of criteria 1 of CP10 and the need to help deliver substantial job growth, at this step in the site selection process options are developed so they are capable of providing a range of site options depending on location and topography. 5ha of land for employment development is seen to be a reasonable size to attract a range of business opportunities and has therefore been used as a guide but this is not always achievable.
- 3.21 In considering where the proposed employment land should be located within an individual site option, proximity to the principle road network has been a consideration. Generally existing field boundaries have been used to define the areas.

Exclusions

- 3.22 Each site is identified in the SHLAA by an individual reference number. Not all the land identified is considered suitable in particular for large scale mixed use development. The following SHLAA sites have been excluded from further consideration. These sites and the reasons why are listed below:

Sites west of the A350 - SHLAA sites 467, 468, 469

²⁰ CEPS/01 Evidence Paper 1: Employment

²¹ As described in paragraph 6.33 of CEPS/01

- 3.23 Briefing Note 2: Definition of Strategic Areas explains why land to the west of the A350 was not considered to be a realistic growth option based on an assessment of the areas historic, archaeological and landscape setting and the severance created by the role and function of the A350²². The Inspector agreed that not identifying strategic areas to the west of the A350 was *“a logical consequence of the appraisal at strategic level and there is no contrary evidence to suggest otherwise.”*²³

Sites within the existing built up area - SHLAA sites 47, 117, 149, 453, 457, 503, 150 (Langley Park).

- 3.24 ‘Non-strategic’ housing sites within the existing built up area of Chippenham can already be brought forward where they are in accordance with Wiltshire Core Strategy policies.)

Sites already committed and/or subject to signing of section 106 agreement - SHLAA sites 626, 801 (North Chippenham), 491, (Hunters Moon)

- 3.25 These sites will not be assessed as they can already come forward for development.

Sites detached from the built up area of Chippenham - SHLAA sites 165, 3378, 455, 3092

- 3.26 The Plan is considering sites adjacent to the continuous urban area of Chippenham. Most of the SHLAA sites on the edge of Chippenham are capable of becoming part of the continuous urban area of Chippenham in combination with other SHLAA sites. SHLAA sites 165 and 3378 are the clear exception. Sites 455 and 3092 could only become part of the continuous urban area for Chippenham following preceding large scale development, effectively ruling them out of consideration within this plan period to 2026. Including strategic site options of this size would prejudice decisions about development that would be better taken in future development plans for the area.

²²CEPS/13 Briefing Note 2: Definition of Chippenham Strategic Areas
<http://www.wiltshire.gov.uk/planninganddevelopment/planningpolicy/chippenhamsiteallocationsplan/chippenhamcommunityengagement.htm>

²³ EX/01 Paragraph 4: Inspector’s Initial Appraisal (18.09.15)

Strategic site options

- 3.27 The Strategic Site Options Assessment assesses 22 sites across the 5 strategic areas, as set out in **Appendix 4**. The conclusions of the assessment are included below.

Strategic Area A

Conclusion

- 3.28 Strategic Area A only contains one strategic site option. The site is being actively promoted by a single developer. Consequently Strategic Site Option A1 will continue through to the next stage of assessment.

Accepted	Rejected
Strategic Site Option	Strategic Site Option
A1	

Strategic Area B

Conclusion

- 3.29 A review of Strategic Area B does not result in any additional site options. The original Strategic Site Option B2 is being rejected as it extends further past SHLAA site 506a. Strategic Site Option B1 is retained for the next stage of assessment

Accepted	Rejected	
Strategic Site Options	Strategic Site Options	Reason
B1		
	B2	Additional area is outside of the SHLAA causing issues with deliverability. Concerns relating to landscape impact.

Strategic Area C

Conclusion

- 3.30 The strategic site options in Strategic Area C use both natural features such as topography, rivers and field boundaries as well as man-made features such as pylons and the North Wiltshire Rivers Route to create boundaries. All land included in each option is being promoted for development and therefore both the original

options (Strategic Site Options C1 and C2) and the additional options (Strategic Site Options C3 and C4) will continue through to the next stage of assessment.

Accepted	Rejected	
Strategic Site Options	Strategic Site Options	Reason
C1		
C2		
C3		
C4		

Strategic Area D

Conclusion

- 3.31 Strategic site options within Area D have been created with regard to the topography of each site, natural and man-made features and are generally within the visual envelope of the existing urban area of Chippenham as identified in landscape evidence to the CSAP. Only a part of Strategic Site D1 (known as Forest Farm) is currently the subject of a planning application although the whole site is being promoted through the CSAP by Gleeson Developments Limited.
- 3.32 Strategic Site Option D2 does not appear a logical means to extend the urban area into the countryside. The length of boundary fronting countryside relative to its developable area would suggest it would be more difficult to design a satisfactory visual boundary to the town. It is not a site actively promoted for development, as yet at least. Option D2 does not seem a rational extension or a logical first step in developing a longer term pattern of development extending the urban area south east.
- 3.33 Strategic Site Option D5 includes a quantum of development of approximately 2100; in a single site this is 18% over the number of homes required in this plan period. A number of land ownerships are involved and there are concerns that a substantial part of the site could not be developed within the Plan period to 2026 (in excess of 200 homes a year would need to be delivered). Consequently this strategic site option is not considered to be a reasonable alternative.
- 3.34 Strategic Site Option D6 has been proposed to show a concept without regard to detailed consideration of a site boundary to reflect submitted comments on the CSAP. A more detailed boundary could be determined through more detail master planning, but based on the evidence on landscape and visual impact the result would in large part resemble Site Option D7. This uses more substantive features that can be a basis of a boundary: the lanes, topography and field enclosures.

Accepted	Rejected	
Strategic Site Options	Strategic Site Options	Reason
D1		
	D2	Does not represent a logical extension into the countryside
D3		
D4		
	D5	An extensive area of development which will exceed the housing requirement to be delivered within this plan period as well as representing a challenging annual delivery rate from a single site.
	D6	Does not have an appropriate boundary and resembles Option D3 and D7
D7		

Strategic Area E

Conclusion

- 3.35 To determine which sites to take forward for further analysis in Strategic Area E it is necessary to return to the principles established in paragraphs 1.15 and 1.16 above. It is recognised that a strategic site in multiple ownerships can be a barrier to delivery and sites that are excessive in size may not be delivered in the Plan period without prejudicing decisions for future plans. Site Options E6 and E7 would deliver the whole Plan requirement for housing and require the promoters of up to 10 SHLAA sites to cooperate in its coordinated delivery. Within the remaining time period of the Plan to 2026 this is not considered achievable. These site options have therefore not been taken forward.
- 3.36 There are similar concerns in relation to Site Options E3, E4, E5 and E8. The number of interests and the scale of development is large with all sites promoting more than 1000 homes with at least 5 different site promoters involved. These raise concerns about their achievability. It is important however, at this stage, that all SHLAA sites are considered as part of a reasonable site option to make sure the issues they raise are considered. Therefore E3 and E5 are taken forward for further assessment.
- 3.37 Site Option E3 tests the acceptable southern extension of development to the south of Chippenham and was one of the original site options tested to develop the submission draft Plan. (Rejected site option E7 also includes land to the south and conclusions in this respect could be transferred to this option should analysis need to be revisited).
- 3.38 The B4528 is considered to be a strong man made boundary to a potential urban extension to the south west of Chippenham. It is already a well used road. However, Site options E4 to E8 include this land. Using the principle that development should proceed from the urban edge outwards an option should be tested that includes sites in this location and others that will become part of the

town's visual envelope should other options such as E1 and E2 be taken forward. Therefore E5 is taken forward to test the capacity of all land within the envelope of the town to a level of development considered achievable within the Plan period.

Accepted	Rejected	
Strategic Site Options	Strategic Site Options	Reason
E1		
E2		
E3		
	E4	The potential advantages and disadvantages of option E4 will be considered as part of the smaller option E1 and larger option E5.
E5		
	E6	This is a large option and requires cooperation between 8 different SHLAA site promoters to bring the site forward. The complexity and size of the site has led the council to conclude that the strategic site option would not be achievable within the plan period.
	E7	This is the largest option and requires cooperation between 9 different SHLAA site promoters to bring the site forward. The complexity and size of the site has led the council to conclude that the strategic site option would not be achievable within the plan period.
E	E8	Minor variation to site option E5 and E3. Principles tested in these options

Next Steps

3.39 The following sites are being taken forward as reasonable alternative site options for further assessment in the sustainability appraisal (Step 4 of enhanced methodology) and policy assessment (Step 5 of enhanced methodology).

Strategic Site Option	Principles established in paragraphs 1.15 and 1.16 above				SHLAA site references	Comment
	Available	Suitable	Achievable	Development principles		
A1	✓	✓	✓	✓	744	Site being actively promoted by a developer
B1	✓	✓	✓	✓	506a	Site being actively promoted by a developer
B2	✗	✓	✗	✓	506a+	Additional land is not within the SHLAA and cannot be considered available and achievable
C1	✓	✓	✓	✓	506b (part), 458	Site (506b) being actively promoted by a developer, but more extensive options
C2	✓	✓	✓	✓	506(b), 458	Site being actively promoted by a developer
C3	✓	✓	✓	✓	506(b), 458	Site (506b) being actively promoted by a developer, but more extensive options
C4	✓	✓	✓	✓	506(b)	Site being actively promoted by a developer
D1	✓	✓	✓	✓	494	Site being actively promoted by a developer
D2	✓	✓	✓	✗	809 (part)	Does not represent a logical extension into the countryside and does not adhere to development principles
D3	✓	✓	✓	✓	809,456 (part)	
D4	✓	✓	✓	✓	809,494	
D5	✓	✓	✗	✓	809, 456 (part)	An extensive area of development which exceeds the housing requirement for the plan period and cannot be considered achievable

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Strategic Site Option	Principles established in paragraphs 1.15 and 1.16 above				SHLAA site references	Comment
	Available	Suitable	Achievable	Development principles		
D6	✓	✗	✓	✗	809, 456 (part)	Does not have an appropriate boundary and cannot be considered suitable (also resembles other site options and does not adhere to development principles)
D7	✓	✓	✓	✓	456 (part)	
E1	✓	✓	✓	✓	454a,481, 471	Site being actively promoted by a developer, but more extensive options
E2	✓	✓	✓	✓	454a,481,471,800	Site being actively promoted by a developer
E3	✓	✓	✓	✓	454a,481, 471, 800,473, 808	Most of site being actively promoted by a developer. Tests the southern extremity of development in Strategic Area E.
E4	✓	✓	✓	✗	454a,481,471, 639, 504	Minor variation to E1. Principle of development to east of B4528 tested in site options E5.
E5	✓	✓	✓	✓	454a,481,471, 800, 639,698, 504,472	Site being actively promoted by developers. Tests the total capacity of land towards the existing urban edge of Chippenham.
E6	✓	✓	✗	✗	454a,481,471,800, 639, 504, 698, 472, 473	Not deliverable within the Plan period nor achievable due to complexity of contributors
E7	✓	✓	✗	✗	454a,481,471, 800, 698, 639, 504, 472, 473, 808	Not deliverable within the Plan period nor achievable due to complexity of contributors
E8	✓	✓	✓	✗	454a,481,471, 800, 698, 639, 504, 472	Minor variation to site option E5 and E3. Principles tested in these options.



Rejected site options

Site option promoted by a developer/landowner

4. Step 4: Sustainability Appraisal Strategic Site Options

Objective: To undertake Sustainability Appraisal of the reasonable alternative strategic site options in each Strategic Area.

Introduction

- 4.1 Chapter 8 of the submitted draft SA Report considered specific strategic site options only in strategic areas E, B and C. This step assesses all the potential strategic site options identified in step 3 on an equitable and transparent basis. Each site option has been assessed using an SA Framework. This contains a set of twelve sustainability objectives representing a range of environmental, social and economic aspects of sustainable development. A judgement is reached on each site option as to what significant effects under each objective are likely to occur as a result of their development. A set of decision aiding questions help ensure that assessment is made at an adequate level of detail, is consistent and conclusions are fully evidenced.
- 4.2 Evidence papers map constraints and information for these assessments. Further transport evidence provides further information on the attributes of each site option. A map of constraints impinging on the development of specific sites avoids wider area judgements being applied.
- 4.3 The detailed appraisal of all the site options is presented as 'Sustainability Appraisal Addendum 1 : Sustainability Appraisal of Strategic Site Options'. The appraisal concludes with recommendations for each strategic site option on what would be important from a sustainability perspective and should therefore influence the decision as to whether or not a site is taken forward. It suggests what mitigation measures may be necessary to ensure particular sustainability benefits are realised and identifies essential measures to ensure a development's acceptability. An outcome of the assessment is an:
- Identification of more sustainable (preferred) site options for consideration in the preferred development strategy;
 - Identification of less sustainable (not preferred) site options which should only be considered if more sustainable options are undeliverable; and
 - Identification of options which should not be given further consideration.

Summary of Results

- 4.4 Likely effects are measured through a scale from major positive to major adverse (green through to red) against each sustainability objective question. A summary of the results has been presented in a tabular form (see figure 4.1) with objectives split between environmental and socio-economic effects.
- 4.5 A number of common effects were identified across all sites. These were:
- moderate adverse effects (where mitigation is considered problematic) relating to the extent of best and most versatile agricultural land and greenfield land (SO2)

- minor adverse effects (where mitigation is considered achievable) in terms of risk of flooding associated with the site (SO5b)
- no effects on Air Quality Management Areas (SO4)
- minor beneficial effects in relation to reduction of deprivation in the surrounding areas (SO9)
- moderate beneficial effect in relation to the site's ability to harness renewable energy on-site (SO5a)

4.6 The following conclusions and recommendations were reached on individual site options:

“More sustainable options for development

4.7 Options B1, C1, C3, C4, D7, E1, E2, E3 and E5 are of relatively higher sustainability performance and are recommended for consideration in the development of the preferred development strategy.

4.8 However, significant sustainability issues associated with Options B1, C1, C3, C4, D7 and E3 (as identified in the discussion for each option) would need to be resolved prior to inclusion in the preferred development strategy.

Less sustainable options for development

4.9 Options D1, D3 and D4 are considered less sustainable than those identified above as they deliver the least beneficial effects compared to those in the more sustainable options. They should only be given further consideration in the preferred strategy if the options identified above are not deliverable.

Options which should not be given further consideration

4.10 Option A1 due to the major adverse biodiversity effects (SO1) identified should not be given further consideration in the preferred strategy.

4.11 Option C2 due to the major adverse landscape effects (SO7) identified should not be given further consideration in the preferred strategy.”

5. Step 5: Policy review of strategic site options

Objective: To undertake a review of reasonable alternative strategic site options in each strategic area to highlight the strengths and weaknesses of each against existing plan objective.

Introduction

- 5.1 The Site Selection Report published in February 2015 included strategic site options in Areas E, B and C. This analysis has been extended (as explained in Chapter 3) to include strategic site options in each strategic.
- 5.2 Set out below is an policy assessment of each reasonable alternative strategic site option using the evidence base that was submitted with the Plan in July 2015 and new evidence created as part of the enhanced methodology discussed with the Inspector following the suspension of the hearings in November 2015 (paragraphs 29 and 30 of the Introduction lists this evidence)
- 5.3 The previous narrative assessment of each strategic site has been replaced with a more detailed SWOT analysis to highlight the strengths and weaknesses of each. The examination of each strategic site option against the Plan’s objectives will identify those sites with the most potential to support the employment led strategy for Chippenham established in the Core Strategy.
- 5.4 To inform the SWOT analysis of each strategic site on an equivalent basis the first stage assesses evidence on all the indicators listed in strategic site assessment framework (**APPENDIX 2**). To aid consistency with the assessments each indicator was ascribed a relative value, taken from existing evidence, against which to measure a site option. Examples are provided below with the full assessment criteria included at **APPENDIX 5**. This follows examples of good practice from other local authorities.²⁴

Indicator: Distance to railway station

Categorisation	Distance Banding
Strong	0m-1600m (up to approximately 1 mile)
Moderate	1600m-2400m (approximately 1 to 1.5 miles)
Weak	2400m-3200m (approximately 1.5 to 2 miles)

Source: Supplement to Transport and Accessibility Evidence: Part 1a – Strategic Site Options (CEPS/04a)

Indicator: Scale of development at which there will be potentially harmful encroachment on settings to settlements

Visual prominence judgment:

²⁴ For example Sustainability Appraisal and Site Selection Methodology, Sefton Local Plan, Sefton Borough Council, November 2014

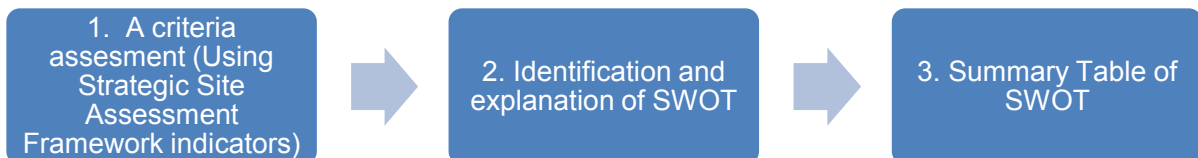
High/Moderate-high/Moderate-low/Low

Remoteness and tranquility judgment:

Remote/Peaceful/Some interruption/Not tranquil

Source: Appendix A Landscape Character Assessment (CEPS/06)

- 5.5 Once an initial assessment has been made the next stage was to draw out the strengths, weaknesses, threats and opportunities for each site within the SWOT framework. Site options can share several characteristics. So, generally, it is considered at this stage that each site option due to its scale is capable of providing a mix of house types including affordable housing. For those Strategic Areas that contain more than a single reasonable strategic site option, to help identify particular differences between site options within that strategic area a further stage in the assessment identifies any distinctive aspects of a site option compared to the other site options within that area.
- 5.6 The conclusions of these assessments will then be used to inform the development of reasonable alternative development strategies (Step 6) as will the conclusions of the Sustainability Appraisal of both the Strategic Areas and the Strategic Site Options.
- 5.7 For each strategic area there is, therefore:



- 5.8 Using the six criteria from the Wiltshire Core Strategy (which are consistent with the Plan objectives) and evidence requirements set out in the Strategic Site Assessment Framework, the assessment reports under each site option:
- Strength: There would be a benefit from developing here because...
 - Weakness: There would be harm from developing here because...
 - Opportunity: Developing here would offer the wider benefit of...
 - Threat: Developing here would risk the wider harm of...

5.9 The results for each site use the template for a summary SWOT table as shown below:

•	• Strategic Site option name							
• CP10 criteria	• Strength		• Opportunity		• Threat		• Weakness	
• 1. Economy	←		• Description of strength - there would be a benefit from developing here because...					•
• 2. Social			•	•	•	•	•	•
• 3. Road network		←	• Source of evidence: Such as EP1-7 and Strategic Site Assessment Framework					•
• 4. Accessibility			•	•	•	•	•	•
• 5. Environment			•	•	•	•	•	•
• 6. Flood risk			•	•	•	•	•	•

Figure 5.1: SWOT Template

Individual Strategic Site Option Assessments

- 5.10 Set out below are the conclusions of the SWOT assessments for each strategic site option. The detailed assessments are included in **APPENDIX 6**. For Strategic Areas C, D and E there is also a comparative summary assessment between strategic site options within each area.

Strategic Area A: Strategic Site Option A1

Economy

- 5.11 Although site A1 can physically accommodate employment land or premises and provides an attractive setting the site is reliant on the completion of the first section of an Eastern Link Road associated with the North Chippenham site to provide the link to the A350 and onto the PRN and, as a consequence, may not be a site that businesses will be immediately be attracted to nor available in the early parts of the Plan period. Parts of the site might have a poor relationship with existing residential properties and the proposals for the site only include B1 uses and therefore will not introduce choice to help support economic resilience. The site is being actively promoted by a developer.

Social

- 5.12 The main strengths of this option are its potential for green energy and scope for a high quality design. The site does have the ability to provide informal and formal recreational facilities although there are relatively few opportunities to develop recreational potential.

Road network

- 5.13 This site has weak potential to offer wider transport benefits to the community as it is located close to congested corridors and has moderate non-motorised access to the town centre. Transport work concludes that A1 does not provide opportunities for wider transport improvements.

Accessibility

- 5.14 There is the opportunity to provide good connection to the A350 but such opportunities rely creating good connections to the North Chippenham site. Overall the site has moderate/poor opportunities to improve access to key facilities by non-motorised transport. It has a strong relationship with Hardenshuish and Sheldon Schools, however these schools do not have any capacity. There is moderate access to the Chippenham College campus on Cacklebury Road, the town centre and the Railway Station. The opportunity for

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development to deliver new attractive walking and cycling links, which are of use to existing communities, may be limited and the site is poorly served by public transport.

Environment

- 5.15 The site has a low development capacity, due to the importance of separation between Chippenham and Kington Langley and its attractive landscape character. Birds Marsh Wood CWS is an important ecology area and there is the potential for development at this site to have a cumulative effect upon Birds Marsh Wood when considered in combination with the permitted development at North Chippenham. The land around Langley House is particularly important and sensitive to development. There is a high potential for harm to heritage assets with archaeological interest dating to the prehistoric, Roman and medieval periods

Flood risk

- 5.16 The site is entirely in Flood Zone 1.

Conclusion in relation to Strategic Area A

- 5.17 There are significant concerns in relation to landscape, ecology and heritage in relation to Strategic Site Option A1. Furthermore, the opportunity to take advantage of the relative merits of the strategic area have been delivered through the North Chippenham planning permission. Strategic Site Option A1 does not exhibit the same benefits, does not provide any wider benefits in relation to the road network of Chippenham and it is reliant on the permitted site to improve access for both cars and pedestrians. On balance, therefore, it is considered that Strategic Site Option A1 does not sufficiently comply with the requirements of the Core Policy 10 criteria.

Strategic Area B: Strategic Site Option B1

Economy

- 5.18 The site is being actively promoted by the land owner and subject to a current planning application. The site also has excellent access to the railway station leading to good potential to contribute to wider economic growth although the landscape and heritage consideration associated with the site may mean the range of traditional employment uses may be limited. To a degree the site is reliant on completion of the first section of an Eastern Link Road. It also has a location, given its strong accessibility to these locations, that it can have a complementary commercial role to the town centre and railway station.

Social

- 5.19 The site has a network of PRow linking the edge of Chippenham with the wider countryside as well as having strong impacts on leisure facilities due to the sites location relatively close to the Olympiad Leisure Centre, the primary indoor leisure facility in Chippenham. There are potential pollution sources in Langley Park industrial area and the site has a large distance to travel to the waste water works, although the extent of these risks is unknown at the moment.

Road Network

- 5.20 Overall, this site has strong potential to offer wider transport benefits to the community as it has strong access to the town centre, particularly the railway station. New road infrastructure would be required if development takes place on this site. The infrastructure would take the form of a link road from Cocklebury Road across the railway bridge to Area A. Although the crossing point is in a cutting which will reduce the cost and scale of engineering works required, a new bridge would represent an additional cost to the development and could have consequential time implications on the delivery of the site. However, it does provide wider transport benefits in terms of introducing an alternative access to and from the Cocklebury Road/Station Hill area helping to divert some traffic away from the town centre. The site could also contribute to the provision of an Eastern Link Road, if required, which can further relieve congestion in the town.

Accessibility

- 5.21 The site has strong access to the town centre and performs particularly well for access to the railway station. The site has weak, very-weak access to the Primary Road Network and in proximity to the congested corridors to the north of the town centre. The impact of the Cocklebury Link Road will reduce the potential impact of development on existing congested corridors and better support public transport.
- 5.22 The site has a strong relationship with the railway station. It also has relatively strong or moderate access to public transport corridors and could provide some potential for improving public transport accessibility for existing residents. Furthermore it could provide some potential

for providing new attractive walking and cycling links that are of use to existing communities. It also has moderate accessibility to other amenities such as secondary schools and the college, however the nearest secondary schools do not have capacity.

Environment

- 5.23 The area has a high visual prominence with development in this area likely to make the urban edge of Chippenham more prominent in the wider landscape. The site area (the area south of Peckingell Farm), is marginally less sensitive in landscape terms. The site consists of improved agricultural grassland with limited ecological value. There are heritage assets within and adjacent to the site which should be protected from development. Development would increase the urban influences on the wider landscape and considerably extend the perceived edge of Chippenham reducing separation between the town and rural outlying villages

Flood risk

- 5.24 Surface water from this area will be directed to the River Avon so the creation of large impervious areas here may lead to additional peak flows joining the river. The drainage effect on water levels downstream could be significant and so any developments would need to mimic the green field runoff state or preferably improve on it. In addition, new road and dedicated links across the river, if required, could if located outside flood zone 1 displace water, disrupt natural flows or involve the loss of existing flood storage.

Conclusion in relation to Strategic Area B

- 5.25 As with other strategic sites around Chippenham Strategic Site Option B1 presents threats in relation to the potential impact on the landscape and heritage assets within and adjacent to the site. However, the strategic site option also presents the opportunity to provide wider transport benefits through an alternative point of access and egress from the Cocklebury Road/Station Hill area and an employment location close to the town centre and railway station. Furthermore it can contribute to opportunities to improve the highway network at Chippenham. On balance from a policy perspective, it is an option which should be considered further as it supports an employment led strategy and other CP10 objectives.

Strategic Area C: Strategic Site Options C1, C2, C3 and C4

Economy

- 5.26 This is a remote Strategic Area with limited existing road infrastructure and very weak access to the PRN which affects all of the site options. Access is currently via narrow rural lanes or access tracks to farms. The lack of suitable access opportunities may deter businesses from this location, so any development proposals would need to be supported by extensive new road infrastructure. Only sites which are able to improve access to the A350 are likely to become attractive to businesses as this will open up the site's development potential, so options C1, C2 and C4 are likely to outperform C3. However, the costs to development being dependant on extensive new road infrastructure could affect the viability of development in this strategic area.
- 5.27 Site option C4 is being actively promoted and subject to a planning application which suggests this site is potentially viable and deliverable in the short to medium term. The other site options are larger or smaller than the application and may have a slower speed of delivery.

Social

- 5.28 For all of the site options, the distance to waste water works would require a relatively long and expensive connection.
- 5.29 All site options have excellent proximity to Abbeyfield School where there is known capacity and a good relationship to Stanley Park. None of the sites have good access to the Community Hospital, although option C2 is potentially the worst due to its size. Also due to its size, site option C2 has potential to notionally deliver a new GP practice on site. The viability of strategic site options which could deliver an eastern link road (options C1, C2 and C4) may affect the delivery of affordable housing.

Road network

- 5.30 As stated above all strategic site options are located in an area which has very weak access to the primary road network although strategic site options C1, C2 and C4 do provide an opportunity to create a link to the A350 through Strategic Areas B then A. Such a road would reduce the potential impact of development on existing congested corridors. In the absence of any new link roads, development of in the Strategic Area would place significant pressure on the A4 corridor from Pewsham and through the town centre. Site option C3 has no potential to facilitate an eastern link road, potentially leading to unacceptable delays to the network.

Accessibility

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- 5.31 All of the options have a very strong relationship with Abbeyfield school, however option C3 focuses more development land in the proximity of the school. All of the site options have land which is assessed as having strong to moderate access by non-motorised means of travel to the railway station, college and town centre; however access to these facilities is hindered by the opportunities to cross the River Avon. Transport evidence advises that Strategic Area C is identified as presenting the greatest opportunity for providing new walking and cycling links that are of use to existing communities. Site option C3 has the most amount of land with strong access to public transport corridors with site option C2 performing the worst.

Environment

- 5.32 All site options, apart from site option C3, propose development that broaches the line of the North Wiltshire Rivers Way
- 5.33 Strategic Area C has an attractive landscape character. The open character and strong association with the rivers and floodplain are important characteristics to safeguard. Development in this Strategic Area has the potential to reduce separation between Tytherton Lucas and Chippenham, which would reduce its remote and tranquil character. In addition development would be visually prominent from surrounding high ground and could make this edge of Chippenham considerably more notable in the surrounding countryside. The options which broach the North Wiltshire Rivers Route (C1, C2 and C4) have a higher potential to reduce separation between Chippenham and Tytherton Lucas. It follows that the strategic site options which present the greatest scale of development and therefore encroach further into the landscape setting of Chippenham perform the worst in terms of potential landscape impact, with option C2 performing worst. Strategic site option C3 is bounded by the NWRR development and constrained to land in areas of higher development capacity.
- 5.34 Harden's Farmhouse has 18th century origins. The land that surrounds this grade II listed building provides its setting and contributes to the significance of the asset. The setting of Tytherton Lucas Conservation Area is also affected by development in this Strategic Area. Land to the east of Strategic Area C is more ecologically valuable, so site options C2 and C4 which extend further east are likely to have a worse impact on designated ecological sites and/or protected species.

Flood risk

- 5.35 Drainage from all site options will be directed to the Rivers Avon or Marden. The drainage effects on river levels could be significant, and so any development would need to at least mimic the green field run off state or preferably improve it. There is a large amount of land classed as at risk of flooding within Strategic Area C although all options exclude this land from development, although the extent of land at risk of flooding may have a bearing on the potential for and design of SUDS. If a new road and dedicated links across the river occur (as per options C1, C2 and C4) and are located outside of flood zone 1, this may displace water, disrupt natural flows or involve the loss of existing flood storage. This is less likely to occur under site option C3 as this option cannot facilitate an eastern link road.

- 5.36 Due to the size and extent of site option C2 it borders both the River Avon and River Marden and consequently is likely to have the highest requirement for the management of flood risk of all the four site options.

Conclusion in relation to Strategic Area C

- 5.37 Essentially those strategic site options which extend furthest into the countryside around Chippenham present greater threats in terms of their impact on landscape, biodiversity and the potential to reduce the separation between Chippenham and Tytherton Lucas. Therefore in this respect strategic site options C2 and C4 are the least preferred from an environmental point of view. However, this needs to be balanced against the opportunity to provide better connections to this Strategic Area from the primary road network which would unlock a potentially new employment location for the town and reduce delays on existing congested transport corridors. On balance from a policy perspective, recognizing the potential opportunities provided by an Eastern Link Road, those options which could support an Eastern Link Road with relatively less environmental impact and therefore best support the objectives of the CP10 criteria should be considered further (strategic site options C1 and C4).

CP10 Criteria	C1	C2	C3	C4
	ECONOMY			
Strength		As this site option is the largest, it is most likely to have the critical mass needed to facilitate a link road and bridge	Proposes housing in the southern sector which may be more compatible with existing uses The option is likely to have low development costs, as it cannot facilitate an ELR	The site is being actively promoted by the land owner and subject to a planning application which means the site it likely to be viable and deliverable in the short to medium term.
Opportunity			This site has more land	

CP10 Criteria	C1	C2	C3	C4
			located against the A4 than the others in Strategic Area C	
Threat	A smaller site than C1 is being actively promoted by the land owner and subject to a planning application which means a smaller site could be viable and deliverable in the short to medium term. However, it could introduce complications to equalisation discussions between landowners.	A larger site than C2 is being actively promoted by the land owner and subject to a planning application which means a larger site could be viable and deliverable in the short to medium term. However, it could introduce complications to equalisation discussions between landowners.	A larger site than C3 is being actively promoted by the land owner and subject to a planning application which means a smaller site could be viable and deliverable in the short to medium term. However, it could introduce complications to equalisation discussions between landowners.	The option provides less employment area than others in Strategic Area C and may not be what businesses require.
Weakness	Only very limited development is acceptable without introducing a bridge crossing of the river to connect to Area B (and Area A). The new bridge would have significant cost	Only very limited development is acceptable without introducing a bridge crossing of the river to connect to Area B (and Area A). The new bridge would have significant cost and time implications on the	There would be no way to connect the development to Strategic Area B without an Eastern Link Road. Consequently access would have to be provided solely from the south of C3. This may not be attractive to businesses given the weak	Only very limited development is acceptable without introducing a bridge crossing of the river to connect to Area B (and Area A). The new bridge would have significant cost and time

CP10 Criteria	C1	C2	C3	C4
	<p>and time implications on the delivery of the site.</p> <p>Option C1 is dependent on delivery of strategic areas A and B and associated Eastern Link Road (ELR) to improve the accessibility to the PRN and open up the site's development potential.</p>	<p>delivery of the site.</p> <p>Option C2 is dependent on delivery of strategic areas A and B and associated Eastern Link Road (ELR) to improve the accessibility to the PRN and open up the site's development potential.</p>	<p>performance in terms of PRN access</p> <p>The lack of an employment area in the south limits choice for businesses compared to all other Area C options</p>	<p>implications on the delivery of the site.</p> <p>Option C4 is dependent on delivery of strategic areas A and B and associated Eastern Link Road (ELR) to improve the accessibility to the PRN and open up the site's development potential.</p>
	SOCIAL			
Strength				
Opportunity		<p>Has sufficient capacity (1,890 units) to notionally deliver a new GP practice on site.</p>		
Threat	<p>Potential for a threat to delivery of</p>	<p>Potential for a threat to delivery of affordable</p>		<p>Potential for a threat to delivery of affordable</p>

CP10 Criteria	C1	C2	C3	C4
	affordable housing, dependant on cost and requirement for an eastern link road and bridge.	housing, dependant on cost and requirement for an eastern link road and bridge.		housing, dependant on cost and requirement for an eastern link road and bridge.
Weakness		The site has the worst access to the Community Hospital having 80% (91 hectares) classed as 'Weak' or 'Very Weak' at more than 1.5 miles from the Hospital		
	ROAD NETWORK			
Strength		The majority (84%) of the site is over 1000m from congested corridors		
Opportunity	Opportunity to create an eastern link road to improve access to the A350 through Strategic Area B (and A) and reduce the potential impact of development on existing congested	Opportunity to create an eastern link road to improve access to the A350 through Strategic Area B (and A) and reduce the potential impact of development on existing congested corridors.		Opportunity to create an eastern link road to improve access to the A350 through Strategic Area B (and A) and reduce the potential impact of development on existing congested corridors.

CP10 Criteria	C1	C2	C3	C4
	corridors.			
Threat	The opportunity to provide a link road may be tempered by the delay to development this may introduce	The opportunity to provide a link road may be tempered by the delay to development this may introduce		The opportunity to provide a link road may be tempered by the delay to development this may introduce
Weakness	<p>Without the provision of an eastern link road all of the development traffic would have to travel through the town centre and impact on queue lengths and add to the traffic passing through Chippenham.</p> <p>In the absence of any new link roads, development of this site would place significant pressure on the A4 corridor from Pewsham and through the town</p>	<p>Without the provision of an eastern link road all of the development traffic would have to travel through the town centre and impact on queue lengths and add to the traffic passing through Chippenham.</p> <p>In the absence of any new link roads, development of this site would place significant pressure on the A4 corridor from Pewsham and through the town centre</p>	<p>This option does not facilitate an eastern link road and therefore there is very little opportunity to improve access to the A350 through Strategic Areas B and A, or to reduce the potential impact of development on existing congested corridors potentially leading to unacceptable delays to the network.</p>	<p>Without the provision of an eastern link road all of the development traffic would have to travel through the town centre and impact on queue lengths and add to the traffic passing through Chippenham.</p> <p>In the absence of any new link roads, development of this site would place significant pressure on the A4 corridor from Pewsham and through the town centre</p>

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CP10 Criteria	C1	C2	C3	C4
	centre			
	ACCESSIBILITY			
Strength			The site option has more development concentrated around the school than other options	
Opportunity			Option C3 has the most amount of land with strong access to public transport corridors	
Threat				
Weakness		Part of site option C2 extends beyond 1.5 miles away from the town centre and railway station into an area of weak access. 41 hectares of the site is classed as "Weak" or "Very Weak" in terms of accessibility to public	Part of site option C3 extends beyond 1.5 miles away from the railway station into an area of weak access.	

CP10 Criteria	C1	C2	C3	C4
		transport corridors		
	ENVIRONMENT			
Strength	Options C1 provides a clear distinct boundary as the development stops at the pylon line	The northern extent of the site is distinct as the development stops at the River Marden.	Options C3 provides a clear distinct boundary as the development stops at the pylon line and the NWRR The other options in Strategic Area C include land above the North Wiltshire Rivers Route which has a low development capacity, however option C3 does not. Option C3 constrains development to land in areas of higher development capacity.	Does not contain any land in the area of low development capacity south of Stanley Lane
Opportunity				
Threat		The site extends into land to the east and is likely to have the worst impact on designated ecological sites and/or protected species.		The site extends into land to the east and is likely to have the worst impact on designated ecological sites and/or protected species.

CP10 Criteria	C1	C2	C3	C4
Weakness	The site has small amounts of land in areas of low development capacity; above the North Wiltshire Rivers Route and south of Stanley Lane.	The site has large amounts of land in areas of low development capacity; a little to the south of Stanley Lane, and a significant amount above the North Wiltshire Rivers Route as it extends up to the River Marden Lane.	The site has very little land in an area of low development capacity, to the south of Stanley Lane.	The site has large amounts of land in areas of low development capacity above the North Wiltshire Rivers Route
	FLOOD RISK			
Strength				
Opportunity				
Threat	A new road and dedicated links across the river could, if located outside flood zone 1, displace water, disrupt natural flows or involve the loss of existing flood	A new road and dedicated links across the river could, if located outside flood zone 1, displace water, disrupt natural flows or involve the loss of existing flood storage.		A new road and dedicated links across the river could, if located outside flood zone 1, displace water, disrupt natural flows or involve the loss of existing flood storage.

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CP10 Criteria	C1	C2	C3	C4
	storage.			
Weakness		The site is bordered on two sides by water courses, incorporating more land at risk from flooding. Although no development would take place in these areas as they would be retained as green space.		

Strategic Area D: Strategic Site Options D1, D3, D4 and D7

Economy

- 5.38 None of the site options in Strategic Area D are an attractive location for employers as they are not connected to the A350 corridor (PRN) or other priority economic areas and would require commercial traffic to pass through the town centre to access the site placing pressure on the already congested A4 corridor and town centre as commercial vehicles access the site from the north. None of the areas benefit from association with existing, established strategic employment areas. Only strategic site options D3 and D7 are theoretically able to facilitate a Southern Link Road, to improve access to the A350 corridor. This dependency on the SLR introduces additional cost and possible delay to the delivery of jobs. However, there are land ownership constraints and a lack of developer interest that could lead to a slow speed of delivery for D3 and D7 and consequential delay to the provision of jobs.

Social

- 5.39 All strategic site options in Area D require relatively long connection to water supply (reservoir north of town) which is likely to be more expensive.
- 5.40 All sites options in Area D perform well in relation to proximity to Abbeyfield school although strategic site options D1 and D4 could be seen to be in the best locations in that regard. All sites have the scope to provide informal and formal recreation for both new and existing population. The threats posed by the sewerage treatment works and the refuse depot in relation to D3 and D7 could be overcome through mitigation. Development in all strategic site options will have an impact on Lodge Surgery which is already at capacity. The degree of impact will be dependent on the size of the site.

Road Network

- 5.41 All site options have weak potential to offer wider transport benefits to the community as the development of any of the sites would place significant pressure on the A4 corridor from Pewsham and through the town centre in the absence of any new link roads. Site options D3 and D7 provide the opportunity to create a southern link road to improve access to the A350 through Strategic Area E and reduce the potential impact of development on existing congested corridors. Site option D1 is unlikely to provide any associated infrastructure which improves highway network resilience.

Accessibility

- 5.42 There is some potential to improve the local highway network, and bus service provision via Pewsham as all sites are well located to the A4. Exiting bus routes have recently been cancelled but additional development may create a more commercially viable proposition associated with the A4. The larger strategic site options (D3 and D4) have the most potential to generate a viable service

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- 5.43 Site options D1 and D4 have a strong relationship to Abbeyfield school, however site options D3 and D7 perform better in regards to access to the town centre, railway station and existing employment areas. Nevertheless none of the site options have development land area within 1 mile of the station

Environment

- 5.44 Strategic Area D is within a former royal hunting forest, and Lodges within the strategic area reflect this historic function. Site options D3 and D7 are in close proximity to Rowden Conservation Area, whereas there is a potential impact on the visual relationship between the Bowood Estate and the edge of Chippenham from site options D1 and D4. The area is visually prominent from the A4 (Pewsham Way) and Naish Hill and there is concern that development will undermine the separation between Derry Hill, Naish Hill and Chippenham.
- 5.45 All site options could have an effect on features of ecological value, with site options D1 and D4 containing the Wiltshire and Berkshire Canal and site options D3 and D7 containing Mortimores Wood County Wildlife Site and the River Avon County Wildlife Site.

Flood risk

- 5.46 Area D is very flat compared to some other areas creating difficulties for drainage by gravity. Any development would drain directly to the River Avon and Blackwell Hams Sewage Treatment Works run by Wessex Water. The drainage effect on water levels downstream could be significant and so any developments would need to mimic the green field runoff state or preferably improve on it.
- 5.47 Site options D3 and D7 provide the opportunity for a southern link road, if new road and dedicated links across the river are required they could displace water, disrupt natural flows or involve the loss of existing flood storage, if located outside flood zone 1.

Conclusion in relation to Strategic Area D

- 5.48 Of all the Strategic Areas, the strategic site options in Area D present the greatest differences between sites. Strategic site options to the east (strategic site options D1 and D4) are relatively closer to Abbeyfield School and existing recreational areas but have the potential to reduce the separation between the edge of Chippenham and the Bowood Estate. Strategic site options to the west (strategic site options D3 and D7) have a better relationship with the town centre but potentially impact on setting of the Rowden Conservation Area. All locations will be prominent in the landscape and are poorly located in relation to the provision of employment land. However, these relative strengths and weaknesses need to be balanced against the opportunity to provide better connections to the primary road network which would potentially improve access to new employment land and potentially reduce delays on existing congested transport corridors. On balance from a policy perspective, recognizing the potential opportunities provided by a Southern Link Road, those options which could support a Southern Link Road with relatively less environmental impact should be considered further (strategic site options D3 and D7) as they best support the CP10 criteria.

CP10 Criteria	D1	D3	D4	D7
	ECONOMY			
Strength	Currently being promoted positively by developers			
Opportunity		A theoretical opportunity to connect to the A350 corridor in association with development in Area E		A theoretical opportunity to connect to the A350 corridor in association with development in Area E
Threat	This may not immediately be a site that businesses will be interested in.	The separate ownership of a strip of land alongside the A4 which would control access to the site should be seen as a risk to delivery.	This may not immediately be a site that businesses will be interested in. A section of the site is being promoted by a developer; a planning application has been submitted for Phase 1. However there is unknown willingness of land owner or developer for the other part of the site.	The separate ownership of a strip of land alongside the A4 which would control access to the site should be seen as a risk to delivery. This site relies on a Southern Link Road to connect it to the A350 to make it more attractive to businesses and could consequently be subject to high development costs. This dependency

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CP10 Criteria	D1	D3	D4	D7
				Introduces possible delay to the delivery of jobs.
Weakness	<p>On its own, the site does not facilitate a Southern Link Road as additional land under separate ownership, not included in this option would be required in the future to complete the southern link road. Therefore no opportunity to create better relationship with the A350 corridor and thereby increase its attractiveness to employers.</p> <p>Smallest area proposed for employment development of all options and therefore the weakest in terms of providing additional choice for a variety of</p>	<p>The site is not currently being promoted actively by the land owner which could lead to a slow speed of delivery.</p> <p>This site relies on a Southern Link Road to connect it to the A350 to make it more attractive to businesses and could consequently be subject to high development costs. This dependency Introduces possible delay to the delivery of jobs.</p>	<p>On its own, the site does not facilitate a Southern Link Road as additional land under separate ownership, not included in this option, would be required to complete the southern link road in the future. Therefore no opportunity to create better relationship with the A350 corridor and thereby increase its attractiveness to employers.</p>	<p>The site is not currently being promoted actively by the land owner which could lead to a slow speed of delivery.</p> <p>This site relies on a Southern Link Road to connect it to the A350 to make it more attractive to businesses and could consequently be subject to high development costs. This dependency Introduces possible delay to the delivery of jobs.</p>

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CP10 Criteria	D1	D3	D4	D7
	business uses			
	SOCIAL			
Strength	Proximity to Abbeyfield School where there is known capacity and good relationship with Stanley Park		Proximity to Abbeyfield School where there is known capacity and a good relationship to Stanley Park	
Opportunity	The Avon Valley Walk routed to the north of Area D and then along the Old Canal provides an existing recreational facility. Potential for restoration of the Wiltshire and Berkshire Canal for leisure and tourism.	The site provides the potential to enhance existing assets with the restoration of the Wiltshire and Berkshire Canal for leisure and tourism.	The Avon Valley Walk routed to the north of Area D and then along the Old Canal provides an existing recreational facility. Potential for restoration of the Wiltshire and Berkshire Canal for leisure and tourism	
Threat	One small site located along the southern edge of D1 identified as medium risk contaminated site.	Relationship to both the sewerage treatment works and the refuse disposal site is a potential threat. There may also be a threat to delivery of affordable housing dependant on cost	One small site located along the southern edge of the site identified as medium risk contaminated site.	Relationship to both the sewerage treatment works and the refuse disposal site is a potential threat. There may also be a threat to delivery of affordable

CP10 Criteria	D1	D3	D4	D7
		and requirement for a southern link road.		housing dependant on cost and requirement for a southern link road.
Weakness	A Government Pipelines and Storage System (GPSS) runs through the site. GPSS wayleaves are generally 6 metres wide (3 metres each side of the pipeline).		A Government Pipelines and Storage System (GPSS) runs through the site. GPSS wayleaves are generally 6 metres wide (3 metres each side of the pipeline).	
	ROAD NETWORK			
Strength				
Opportunity		Opportunity to create a southern link road to improve access to the A350 through Strategic Area E and reduce the potential impact of development on existing congested corridors.		Opportunity to create a southern link road to improve access to the A350 through Strategic Area E and reduce the potential impact of development on existing congested corridors.
Threat	Does not easily present	The opportunity to provide	Does not easily present	The opportunity to

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CP10 Criteria	D1	D3	D4	D7
	wider transport opportunities for existing communities. Development at this site would also be unlikely to provide associated infrastructure which improves highway network resilience.	a link road may be tempered by the delay to development this may introduce.	wider transport opportunities for existing communities.	provide a link road may be tempered by the delay to development this may introduce.
Weakness	On its own, the site does not facilitate a Southern Link Road as additional land under separate ownership, would be required in the future to complete the southern link road.	Without the inclusion of a southern link road this site, overall, has weak potential to offer wider transport benefits to the community as it is located close to congested corridors	On its own, the site does not facilitate a Southern Link Road as additional land under separate ownership, would be required in the future to complete the southern link road.	Without the inclusion of a southern link road this site, overall, has weak potential to offer wider transport benefits to the community as it is located close to congested corridors
	ACCESSIBILITY			
Strength	Strong relationship with Abbeyfield school		Strong relationship with Abbeyfield school	
Opportunity	Poor opportunities to extend existing public transport routed on the	Poor opportunities to extend existing public transport routed on the A4	Poor opportunities to extend existing public transport routed on the A4 into the site,	Poor opportunities to extend existing public transport routed on the

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CP10 Criteria	D1	D3	D4	D7
	A4 into the site, although this site is well placed to benefit from any extended public transport that does occur..	into the site. Larger scale of development with multiple options for access to the A4 may provide opportunities to avoid an 'orbital' style service.	although this site is well placed to benefit from any extended public transport that does occur. Larger scale of development with multiple options for access to the A4 may provide opportunities to avoid an 'orbital' style service	A4 into the site
Threat				
Weakness	<p>The site has a weak relationship with the town centre, rail station, and existing employment sites, it is also far from the A350.</p> <p>Extended public transport routes would probably need to be served by development specific or 'orbital' type services. Typically, it is these types of services that require ongoing subsidy in order for them to be sustained.</p>		The site has a weak relationship with the town centre, rail station, and existing employment sites, it is also far from the A350.	Extended public transport routes would probably need to be served by development specific or 'orbital' type services. Typically, it is these types of services that require ongoing subsidy in order for them to be sustained. The medium to long term potential for public transport services is therefore questionable.

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CP10 Criteria	D1	D3	D4	D7
	The medium to long term potential for public transport services is therefore questionable.			
	ENVIRONMENT			
Strength				
Opportunity	The site has archaeological interest associated with the former Wiltshire and Berkshire Canal, a post medieval brickworks and the medieval deer park, although there is potential for mitigation. Potential for restoration of the Wiltshire and Berkshire Canal to improve ecological value.		The site has archaeological interest associated with the former Wiltshire and Berkshire Canal, a post medieval brickworks and the medieval deer park, although there is potential for mitigation. Potential for restoration of the Wiltshire and Berkshire Canal to improve ecological value.	
Threat	Development could reduce the value of the ecological assets in this area, such as the	New road and dedicated links across the river if required could affect certain features of	Development could reduce the value of the ecological assets in this area, such as the Wiltshire and Berkshire	New road and dedicated links across the river if required could if affect certain features of

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CP10 Criteria	D1	D3	D4	D7
	Wiltshire and Berkshire Canal.	ecological value such as Mortimores Wood County Wildlife Site, the River Avon County Wildlife Site and the disused canal and cycleway; it is also in close proximity to Rowden Conservation Area.	Canal.	ecological value such as Mortimores Wood County Wildlife Site and the River Avon County Wildlife Site; it is also in close proximity to Rowden Conservation Area.
Weakness	Potential impact on the visual relationship between the Bowood Estate and the edge of Chippenham.		Potential impact on the visual relationship between the Bowood Estate and the edge of Chippenham.	
	FLOOD RISK			
Strength	The site lies entirely in Flood Zone 1 – the area of least risk.	The majority of Site D3 is flood zone 1	The site lies entirely in Flood Zone 1 – the area of least risk.	The majority of Site D7 is flood zone 1
Opportunity				
Threat		New road and dedicated links across the river, if required, could if located outside flood zone 1		New road and dedicated links across the river, if required, could if located outside flood zone 1

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CP10 Criteria	D1	D3	D4	D7
		displace water, disrupt natural flows or involve the loss of existing flood storage		displace water, disrupt natural flows or involve the loss of existing flood storage
Weakness				

Strategic Area E: Site Options E1, E2, E3 and E5

Economy

- 5.49 The strategic area is well placed in a strategic location with good access to the A350/PRN. All site options provide a large employment site which would facilitate a good introduction of choice and is deliverable in the short term. It has a strong fit with the economic assessment and has good potential to contribute to wider economic growth. Development in the strategic area would have an attractive environment with recreational opportunities possible for employees.
- 5.50 Site option E2 is being actively promoted and subject to a planning application which means the site is likely to be viable and deliverable in the short to medium term. The other site options which are larger may have a slower speed of delivery. This is especially pertinent for E5 as the nursery site is brownfield.

Social

- 5.51 The undulating landform is an attractive feature and could enable the capture of a variety of views from housing and the street and pedestrian network along the river valley. The floodplain associated with the River Avon provides a suitable location for increasing opportunities for open space and public access provision along the river corridor, while other opportunities for cycle links with Lacock also exist.
- 5.52 The strategic area has strong relationship with health facilities as it is closely linked to the Rowden Community Hospital, but does not have a good relationship with any secondary schools.
- 5.53 The distance from the strategic area to the water supply to the north of town requires a relatively long and expensive connection and may impact on the viability of this site.
- 5.54 Land contamination is thought to be low with the majority of land being farmland, although there are potential pollution sources at the sewage works and the railway line. Site option E1 is furthest from the sewage works, whereas options E2, E3 and E5 are within 350m. Option E5 includes the redevelopment of Showell Nurseries and may be at risk from contamination sources on site. Furthermore E5 includes SHLAA sites 639 and 504 which places residential development directly alongside the railway line which may experience higher levels of noise pollution.

Road network

- 5.55 Due to its location in regards to the A350, all sites perform well in terms of access to the PRN/A350. Site option E3 provides the greatest amount of land, in percentage and absolute terms, within 1000 metres of the A350 and performs particularly well in this regard.

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- 5.56 The majority of the strategic area has moderate/strong links to the town centre by non-motorised modes of transport, however site option E3 has the greatest land area in the 'Weak' category. This proximity to the Town Centre means that there is a risk that development will add to the traffic passing through Chippenham and worsen congestion. Furthermore the northern part of the strategic area has large sections of land that are in close proximity to congested corridors, and development in this area may add to congestion.
- 5.57 All sites could contribute towards the production of a Southern Link Road (SLR) which could reduce the potential impact of development on existing congested corridors, although such a scheme may not be viable if option E1 is taken forward as it may not have sufficient critical mass.

Accessibility

- 5.58 The majority of the strategic area is assessed as being strong/moderate in terms of ease of access by non-motorised transport to the town centre and public transport corridors. Option E3 performs relatively weakest in terms of access to the town centre and public transport corridors because it extends further south away from the edge of Chippenham.
- 5.59 Ease of access to Chippenham's secondary schools and the railway station has been a weakness across all of the strategic area E options, however option E3 performs worst against both of these criterion.
- 5.60 Due to the strategic location and scale of this site, there is a strong opportunity to develop and improve the current public transport network in the local area. This opportunity for improvement also stretches into the public footpath network, with improved links possible with the town centre from this region of Chippenham.

Environment

- 5.61 All site options encompass land within the Rowden Conservation Area which includes Rowden Manor and its setting. All of the site options encroach to the same extent, however an area of green space is included in all options in part to protect and preserve Rowden Manor and its setting.
- 5.62 The extent of the green space identified in all of the site options provide the opportunity to preserve the landscape characteristics in regards to the Rowden Conservation Area and associated river valley.
- 5.63 The site opens up opportunities to preserve and enhance ecological and heritage assets while archaeological interests can be preserved either in situ or widespread archaeological remains can be recorded. Site options E2 and E3 extend around the Showell Farm Nurseries, which has been identified as being a site of archaeological interest. As option E5 redevelops the nurseries it is possible that additional research and mitigation would need to take place.

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- 5.64 The site options progressively encroach further south, into the more remote and valued setting to the south of the strategic area, therefore in landscape terms E1 is strongest. Options E2 and E5 perform slightly worse and E3 extends furthest south and is weakest as it includes most development on land with a higher landscape quality.

Flood risk

- 5.65 The strategic area has areas at risk of flooding from the River Avon and several small tributary watercourses draining into the River Avon. All of the site options propose green space covering the areas at risk of flooding. Some of the area has a propensity to groundwater flooding. This may have a bearing on the design of SUDS. Site option E1 is likely to have the least management of flood risk.
- 5.66 Drainage from all site options will be directed to the River Avon and Blackwell Hams Sewage Treatment Works run by Wessex Water. The drainage effects on river levels could be significant, and so any development would need to at least mimic the green field runoff state or preferably improve it.

CP10 Criteria	E1	E2	E3	E5
	ECONOMY			
Strength	Has the smallest amount of residential development with an undeveloped buffer retained between development and existing housing at Showell Nurseries	The site is being actively promoted by the land owner and subject to a planning application which means the site it likely to be viable and deliverable in the short to medium term.	The additional land in this site option is all within the area assessed as having strong access to the PRN.	
Opportunity				The site encompasses Showell Nurseries as part of the development, redevelopment of the nursery site may reduce potential conflict

CP10 Criteria	E1	E2	E3	E5
				between existing housing and new development.
Threat	<p>A larger site than E1 is being actively promoted by the land owner and subject to a planning application which means a smaller site could be viable and deliverable in the short to medium term. However, as site E1 is smaller than the application it could introduce complications to equalisation discussions between landowners.</p>	<p>The site extends around Showell Nurseries and the existing housing on this site is likely to come into direct contact with any new development.</p>	<p>The site completely encircles Showell Nurseries and the existing housing on this site is likely to come into direct contact with any new development,</p> <p>There is a submitted planning application within the strategic area which is smaller than site option E3, however it suggest the area is likely to be viable and deliverable in the short to medium term. However as site E3 is larger than the submitted application, the speed of delivery may be slower due to additional landowners becoming involved.</p> <p>E3 proposes a significant amount more residential</p>	<p>There is a submitted planning application within the strategic area which is smaller than site option E5, however it suggest the area is likely to be viable and deliverable in the short to medium term. However as site E5 is larger than the submitted application, the speed of delivery may be slower due to additional landowners becoming involved.</p> <p>The brownfield redevelopment of SHLAA site 472 (Showell Nurseries) may add a development cost and slow the speed of delivery for this option.</p>

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CP10 Criteria	E1	E2	E3	E5
			development, which could essentially fulfil Chippenham's housing need to 2026 . Relying on one site may be seen as a threat because of the time it would take to deliver and the limited choice it provides.	
Weakness			Strategic Site Option E3 has the greatest land area (41 hectares) in the 'Weak' category for access to the railway station	
	SOCIAL			
Strength	In terms of noise, contamination and other pollution, as this site does not extend as far south as others, it does not pass close to the sewage treatment works and the			

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CP10 Criteria	E1	E2	E3	E5
	southernmost residential development does not sit on the main A350 trunk road.			
Opportunity				
Threat	There are potential pollution sources at the sewage works and the railway line	There are potential pollution sources at the sewage works and the railway line. The housing development would be within 350m of the sewage treatment works.	There are potential pollution sources at the sewage works and the railway line. The housing development would be within 350m of the sewage treatment works.	There are potential pollution sources at the sewage works and the railway line. The housing development would be within 350m of the sewage treatment works. The inclusion of SHLAA sites 639 & 504 places residential development in this area directly alongside the railway line by developing west of the B4643, development in this area would be at a higher susceptibility of higher levels of noise pollution. Furthermore, development of

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CP10 Criteria	E1	E2	E3	E5
				brownfield land may be subject to contamination.
Weakness				
	ROAD NETWORK			
Strength	The site has moderate/strong links to the town centre by non-motorised modes of transport.	The site has moderate/strong links to the town centre by non-motorised modes of transport.	Strategic Site Option E3 provides the greatest amount of land, in percentage and absolute terms, within 1000 metres of the A350	The site has moderate/strong links to the town centre by non-motorised modes of transport.
Opportunity	The site could contribute towards the production of a Southern Link Road (SLR) which could reduce the potential impact of development on existing congested corridors, however such a scheme may not be viable due to the smaller size of E1.	The site could contribute towards the production of a Southern Link Road (SLR) which could reduce the potential impact of development on existing congested corridors,	The site could contribute towards the production of a Southern Link Road (SLR) which could reduce the potential impact of development on existing congested corridors,	The site could contribute towards the production of a Southern Link Road (SLR) which could reduce the potential impact of development on existing congested corridors,
Threat				

CP10 Criteria	E1	E2	E3	E5
Weakness			Strategic Site Option E3 has the greatest land area (41 hectares) in the 'Weak' category for access to the town centre.	
	ACCESSIBILITY			
Strength				
Opportunity				
Threat				
Weakness	Ease of access to Chippenham's secondary schools has been a weakness across all of the strategic area E options. Site option E1 is classified as 62% weak in terms of ease of access to Secondary Schools by non-motorised Modes of transport, at more than	Ease of access to Chippenham's secondary schools has been a weakness across all of the strategic area E options. Site option E2 is classified as 68% weak in terms of ease of access to Secondary Schools by non-motorised Modes of transport, at more than 1.5	Ease of access to Chippenham's secondary schools has been a weakness across all of the strategic area E options, however option E3 performs worst in this regard. Site option E3 is classified as 73% weak in terms of ease of access to Secondary Schools by	Ease of access to Chippenham's secondary schools has been a weakness across all of the strategic area E options. Site option E5 is classified as 68% weak in terms of ease of access to Secondary Schools by non-motorised Modes of

CP10 Criteria	E1	E2	E3	E5
	<p>1.5 miles from a secondary school</p> <p>The site has weak access for residents to the railway station</p>	<p>miles from a secondary school.</p> <p>The site has weak access for residents to the railway station. Relatively more residents are assessed as having weak access to the railway station than in E1.</p>	<p>non-motorised Modes of transport, at more than 1.5 miles from a secondary school.</p> <p>Strategic Site Option E3 has the greatest land area (41 hectares) in the 'Weak' category for access to the railway station.</p> <p>Option E3 performs relatively weakest in Strategic Area E in terms of access to the town centre and public transport corridors.</p>	<p>transport at more than 1.5 miles from a secondary school.</p> <p>The site has weak access for residents to the railway station. Relatively more residents are assessed as having weak access to the railway station than in E1.</p>
	ENVIRONMENT			
Strength	<p>E1 does not encroach onto the more remote and valued setting to the south of the strategic area, with the views from the limestone ridge not being affected as much as a development stretching further south</p>	<p>E2 does not significantly encroach onto the more remote and valued setting to the south of the strategic area, with the views from the limestone ridge not being affected as much as a development stretching</p>		<p>E5 does not significantly encroach onto the more remote and valued setting to the south of the strategic area, with the views from the limestone ridge not being affected as much as a development</p>

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CP10 Criteria	E1	E2	E3	E5
	would do.	further south would do.		stretching further south would do..
Opportunity		The site extends around the Showell Farm Nurseries, which has been identified as being a site of archaeological interest.	The site extends around the Showell Farm Nurseries, which has been identified as being a site of archaeological interest.	
Threat			The development within E3 could detrimentally impact upon the environment in the south of the area, while also impacting upon the distinctive visual quality of the limestone ridge to the southeast.	With development proposed in the Showell Farm Nursery area within E5 (SHLAA site 472), it is possible that additional research and mitigation would need to take place due to the archaeological interests identified in the Showell Farm Nursery area.
Weakness			This strategic site extends around 850m further south than E1. The southern part of the strategic area has a higher landscape quality	

CP10 Criteria	E1	E2	E3	E5
			than the northern part and therefore option E3 is encroaching upon the more remote and attractive landscape to the south of the strategic area.	
	FLOOD RISK			
Strength	E1 has the smallest region that adjoins the River Avon floodplain and hence will have the lowest requirement for the management of flood risk of all the four site options in that regard.			
Opportunity				
Threat				
Weakness				

Conclusion in relation to Strategic Area E

- 5.67 The relative merits of the strategic site options in Strategic Area E generally reflect the outward extent of development proposed. For example, strategic site option E3 extends development furthest south and is the least preferred option in relation landscape impact encroaching on more remote and attractive environments and contains the largest amount of land in a location with weak access to the town centre, railway centre and leisure facilities. All strategic site options have excellent access to the primary road network and in particular the economic corridor of the A350 and do not have any major infrastructure requirements which could delay the delivery of homes and jobs. All strategic site options could have an impact on the Rowden Conservation Area but have extensive areas of green space to enable appropriate mitigation to be considered. On balance from a policy perspective, options that do not encroach too far into the countryside around Chippenham and make the best use of available land should be considered further (strategic site options E1, E2, and E5).

6. Step 6: Identify reasonable Alternative Development Strategies

Objective: To develop alternative development strategies from the Sustainability Appraisal and policy assessment of alternative strategic site options informed by the Sustainability Appraisal and policy review of Strategic Areas that could, in different ways, deliver the objectives of the Plan and the scale of growth proposed in the Wiltshire Core Strategy

Introduction

- 6.1 The SA assessment and policy assessment of each strategic area (Steps 1 and 2) introduced different concepts for alternative patterns of long term development for Chippenham. Individual strategic site options (Steps 3 to 5) have been assessed looking at likely significant social, economic and environmental effects from development (sustainability appraisal – step 4) and their individual strengths, opportunities, threats and weakness (step 5).
- 6.2 This next step, step 6, draws together this information in order to formulate alternative sets of proposals, combining different site options that might best meet strategic requirements for employment and housing development over the plan period and deliver the objectives of the Plan. It culminates in producing alternative development strategies that can be compared with each other.

a) Land requirements

- 6.3 Each alternative development strategy must be developed to provide the ‘at least’ strategic requirements for housing and employment at Chippenham as set out in Core Policy 10 of the Wiltshire Core Strategy.
- 6.4 The Core Strategy establishes indicative scales of the development for both housing and employment over the plan period 2006-2026. These are ‘at least’ 4510 dwellings and 26.5ha²⁵. Requirements for the remainder of the plan period have been updated to account for development and commitments since 2006 as follows:

²⁵ This is explained further in the Introduction and Background section of the Site Selection Report, May 2016

Table 6.1: CSAP strategic land requirements 2006 – 2026

	Core Strategy Requirement 2006-2026	Completions 2006-2015	Commitments April 2015	Residual requirement
Dwellings ²⁶	4,510	1,015	1,715	1,780
Employment land (ha.)	26.5		5.00	21.5

b) Strategic Site Option Assessments (Steps 4 and 5)

- 6.5 As explained in Chapter 3 of this report a number of strategic site options have been identified based on information contained in the strategic housing land availability assessment. Each of these sites has been assessed using Sustainability Appraisal (summarised in Chapter 4: Step 4) and the six criteria set out in Core Policy 10 of the Wiltshire Core Strategy in terms of strengths, weaknesses, opportunities and threats (summarised in Chapter 5: Step 5).
- 6.6 Sustainability appraisal indicates quite similar social and economic benefits arising from the development of strategic sites no matter where they are located. The appraisal, however, also identifies some likely significant adverse effects that would be problematic to overcome. These adverse effects constrain the suitability of some site options.
- 6.7 Against objectives of the Plan the evidence most often shows site options performing well against some objectives and less well against others. Some site options do not perform so well in terms of readily providing land well-suited to providing for business and jobs. Since a primary objective of the plan this is also a significant constraint on the suitability of a site.

Reasonable Alternative Development Concepts

- 6.8 Earlier steps in plan preparation assessed the broad strategic areas identified around Chippenham by the Wiltshire Core Strategy. As well as assessing each one's potential to accommodate large scale mixed use development, this work also looked at how the combination of different strategic areas might combine to provide different patterns of development (summarised in Chapter 2: Step 2).
- 6.9 Those development concepts form the basis for developing alternative development strategies. In terms of the consideration of sites to be included in the alternative development strategies there are two conditions which may result in a site not being taken further forward at this stage:
- conclusions from either the sustainability appraisal or policy analysis that a strategic site option is highly unlikely to deliver sustainability objectives or policy objectives
 - the degree to which a site option can be a component of one or more development concepts that can be taken forward to form a strategy. If an option does not support or 'fit' any development strategy it may be a reason for rejecting it from further assessment.
- 6.10 A strategic site option may be in more than one development strategy.
- 6.11 Step 2 (Chapter 2) identified five possible development concepts. The five concepts represent, in very broad terms, different patterns for Chippenham's long term growth,

²⁶ Housing Land Supply Statement, April 2015 (CHSG/08)

without considering in detail what individual or in combination opportunities there may be, what constraints exist and how each may be capable of delivery.

- 6.12 Three of the possible development concepts also involve the delivery of a link road connection between the A4 and A350; not a by-pass, in the sense of taking existing through traffic out of the town, but primarily a link to gain access to a site and which is necessary to maintain the effectiveness of the town's local road network, to support the impact of development and so help protect the town and vitality and viability of the town centre in particular.
- 6.13 The concepts (illustrated in Chapter 2: Step 2) are:
- 1) the A350 corridor (strategic areas A and E)
 - 2) an eastern link road (strategic areas B and C)
 - 3) a southern link road (strategic areas D and E)
 - 4) a mixed strategy (strategic areas B,C and E)
 - 5) a dispersed strategy (all strategic areas)
- 6.14 Based on early traffic modelling of different scenarios²⁷, some of these development concepts involve Chippenham's growth linked to new roads that might help to address pressures from growth on the transport network. Growth without such mitigation could worsen congestion so much as to harm the vitality of the town centre and the town's resilience as whole, undermining its potential to provide for substantial economic development and job creation.
- 6.15 The different development scenarios tested in the transport evidence was responding to the Wiltshire Core Strategy requirement at Core Policy 10, criterion 3 that development :
'Offers wider transport benefits for the existing community, has safe and convenient access to the local and primary road network and is capable of redressing transport impacts, including impacts affecting the attractiveness of the town centre'.
- 6.16 The National Planning Policy Framework recognises that building a strong, responsive and competitive economy, does not only involve ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; but also by identifying and coordinating development requirements, including the provision of infrastructure²⁸.

Developing Reasonable Alternative Development Strategies

- 6.17 Step 6 is divided into three main tasks to:
- come to a conclusion on each **strategic site options suitability** for development as part of a reasonable alternative development strategy,
 - combine suitable site options into **Alternative Development Strategies** based on the development concepts. Each development strategy must, for instance, at least provide sufficient land to meet strategic requirements for employment and housing development set out in Table 6.1; and then

²⁷ Transport and Accessibility Assessment Part 1, October 2014, paragraph 7.9, CEPS/04

²⁸ National Planning Policy Framework, paragraph 7 (CNNP/01)

- set out the evidence for **achieving and delivering** each Alternative Development Strategies describing the evidence as to the degree and manner to which they are achievable.
- 6.18 The conclusions on the suitability of an individual site option does not rely on the simple fact that a site has been promoted for development in the SHLAA but has been informed by the SA and policy review of each site to determine their potential to deliver sustainable growth and the objectives of the Plan.

Site Option Suitability

- 6.19 This section summarises the key findings about each strategic site option from the assessments that have been undertaken (Steps 1-2 and Steps 4-5) and makes a judgment as to whether each one should or should not be taken forward in one or other alternative development strategies.
- 6.20 The evaluations included in each table have been informed by
- the sustainability appraisal of
 - strategic areas (Chapter 1: Step 1)
 - and strategic site options (Chapter 4: Step 4)
 - Results set out in detail in Parts 1 and 2 of the Sustainability Appraisal.
 - the policy assessments of
 - strategic areas (Chapter 2: Step 2)
 - and strategic site options (Chapter 5: Step 5)
 - The results are set out in more detail in Appendix 3 and Appendix 6 to this document.
- 6.21 A summary table for each site option highlights the differences between sites. All sites are considered to be capable of delivering a range of social and economic benefits. For example all strategic site options are capable of providing a mix of housing which could be seen as a strength but this is not highlighted in the tables below as it is the differences between how and where those homes will be provided that is crucial to the judgements on which sites to take forward. Each summary therefore reports the likely significant adverse effects of development of a site option that have been recorded by sustainability appraisal. It identifies the differences and does not reiterate those aspects which are common to all.
- 6.22 Based on performance against sustainability objectives, the sustainability appraisal also recommends site options that are:
- More sustainable options for development
 - Less sustainable options for development
 - Options which should not be given further consideration
- 6.23 Consideration of site options is as follows:

More sustainable options for development

Options B1, C1, C3, C4, D7, E1, E2, E3 and E5 are of relatively higher sustainability performance and are recommended for consideration in the development of the preferred development strategy.

However, significant sustainability issues associated with Options B1, C1, C3, C4, D7 and E3 (as identified in the discussion for each option) would need to be resolved prior to inclusion in the preferred development strategy.

Less sustainable options for development

Options D1, D3 and D4 are considered less sustainable than those identified above as they deliver the least beneficial effects compared to those in the more sustainable options. They should only be given further consideration in the preferred strategy if the options identified above are not deliverable.

Options which should not be given further consideration

Option A1 due to the major adverse biodiversity effects identified should not be given further consideration in the preferred strategy.

Option C2 due to the major adverse landscape effects identified should not be given further consideration in the preferred strategy.

- 6.24 A policy assessment considers how the development of each site option will perform against the Core Policy 10 criteria, whether an objective is a strength or weakness of the site and what opportunities and threats there are to achieving an objective or meeting a CP10 criterion. In some cases a CP10 criteria may be repeated where a situation may be considered both a weakness and an opportunity. For example, sites in Strategic Area C are weak in terms of delivering employment land but there is an opportunity to improve the location's attractiveness through delivery of an Eastern Link Road. Another example can be found in Strategic Area E where the potential impact on the Rowden Conservation Area relevant to all options can be seen as a threat but could also provide the opportunity to improve access to and understanding of this heritage asset.
- 6.25 A further judgement is added as to whether a site option may take forward one or other of the development concepts developed from considering broad strategic areas and a wider pattern of development.
- 6.26 Based on the information gathered under both sustainability appraisal and a policy assessment a site option may be rejected. Where it is, the reason is given in as a conclusion.
- 6.27 The Core Policy 10 criteria are numbered as follows.

Core Policy 10 Criteria/CSAP objective

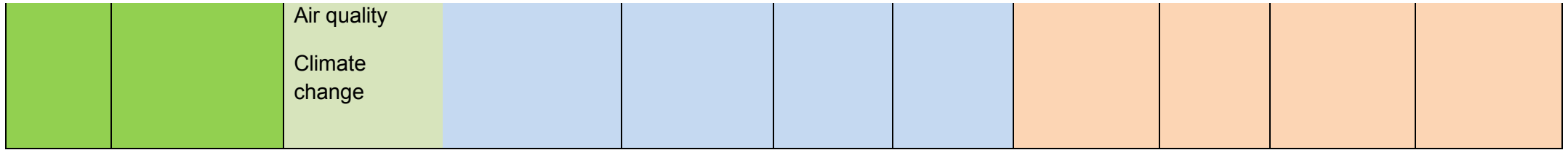
- ① Delivering economic growth
- ② Providing housing supported by appropriate infrastructure
- ③ Improving connectivity and reducing traffic impacts
- ④ Improving access to sustainable transport
- ⑤ minimising landscape impact and protecting the natural, historic and built environment
- ⑥ Managing flood risk

Strategic Site Option A1

		Step 4 : Sustainability Appraisal	Step 5: SWOT Assessment (Performance against CP10 criteria 1-6) ① to ⑥				Step 6 : Identification of Alternative Development Strategies			
Strategic Site Option	Strategic Area Sustainability Issues	Adverse environmental effects on	Strength	Opportunity	Threat	Weakness	Fit with Development Concepts	Rejected or Accepted	Reason rejected	Alternative Development Concepts
A1	Well related to A350. Significant landscape, heritage and biodiversity constraints.	Option which should not be given further consideration MAJOR Biodiversity MODERATE Land Heritage Landscape		②	⑤ ⑥	① ③ ④	?	☐	Major adverse effects where mitigation not possible and moderate impacts difficult to mitigate. Low employment potential and poor fit with development strategies	

		MINOR Water resources Air quality Climate change								
--	--	---	--	--	--	--	--	--	--	--

- ❶ Delivering economic growth
- ❷ Providing housing supported by appropriate infrastructure
- ❸ Improving connectivity and reducing traffic impacts
- ❹ Improving access to sustainable transport
- ❺ minimising landscape impact and protecting the natural, historic and built environment
- ❻ Managing flood risk



- ❶ Delivering economic growth
- ❷ Providing housing supported by appropriate infrastructure
- ❸ Improving connectivity and reducing traffic impacts

- ❹ Improving access to sustainable transport
- ❺ minimising landscape impact and protecting the natural, historic and built environment
- ❻ Managing flood risk

Strategic Area C: Strategic Site Options C1, C2, C3, C4

Strategic Site Option	Steps 1 and 2 Strategic Area Sustainability Issues	Step 4 : Sustainability Appraisal Adverse environmental effects on ..	Step 5: SWOT Assessment				Step 6			
			Strength	Opportunity	Threat	Weakness	Fit with Development Concepts	Rejected or Accepted	Reason	Alternative Development Concept
C1	Separated from the built up area by the River Avon. Landscape and heritage constraints. most extensive tracts of land at flood risk	More sustainable option for development MODERATE Biodiversity Heritage Landscape Climate change MINOR Water resources Land	2 4	3 1	5	3 1	✓	✓		ELR Mixed Strategy

Steps 1 and 2		Step 4 : Sustainability Appraisal	Step 5: SWOT Assessment				Step 6			
Strategic Site Option	Strategic Area Sustainability Issues	Adverse environmental effects on ..	Strength	Opportunity	Threat	Weakness	Fit with Development Concepts	Rejected or Accepted	Reason	Alternative Development Concept
		Air quality								
C2	Separated from the built up area by the River Avon. Landscape and heritage constraints. most extensive tracts of land at flood risk	Option which should not be given further consideration MAJOR Landscape MODERATE Biodiversity Heritage Climate change	② ④	③ ①	⑤	③ ① ⑥	✓	☐	Major adverse effect where mitigation not possible and moderate impacts difficult to mitigate. Although fits with ELR strategy there are other options which support this strategy with reduced environmental	

	Steps 1 and 2	Step 4 : Sustainability Appraisal	Step 5: SWOT Assessment				Step 6			
Strategic Site Option	Strategic Area Sustainability Issues	Adverse environmental effects on ..	Strength	Opportunity	Threat	Weakness	Fit with Development Concepts	Rejected or Accepted	Reason	Alternative Development Concept
		Air quality MINOR Water resources Land							impact.	
C3	Separated from the built up area by the River Avon. Landscape and heritage constraints. most extensive tracts of land at flood risk	More sustainable option for development MODERATE Climate change Air quality	② ④		⑤	③ ①	?	<input type="checkbox"/>	Constraining development to the south of the North Wiltshire Rivers Route removes opportunity for ELR and introduction of an attractive employment	

	Steps 1 and 2	Step 4 : Sustainability Appraisal	Step 5: SWOT Assessment				Step 6			
Strategic Site Option	Strategic Area Sustainability Issues	Adverse environmental effects on ..	Strength	Opportunity	Threat	Weakness	Fit with Development Concepts	Rejected or Accepted	Reason	Alternative Development Concept
		MINOR Biodiversity Heritage Landscape Water resources Land							location	
C4	Separated from the built up area by the River Avon. Landscape and heritage constraints. most extensive tracts of land at flood risk	More sustainable option for development MODERATE Biodiversity Heritage	2 4	3 1	5	3 1	✓	✓		ELR Mixed Strategy

	Steps 1 and 2	Step 4 : Sustainability Appraisal	Step 5: SWOT Assessment				Step 6			
Strategic Site Option	Strategic Area Sustainability Issues	Adverse environmental effects on ..	Strength	Opportunity	Threat	Weakness	Fit with Development Concepts	Rejected or Accepted	Reason	Alternative Development Concept
		Landscape Climate change MINOR Water resources Land Air quality								

- | | |
|--|--|
| <ul style="list-style-type: none"> ❶ Delivering economic growth ❷ Providing housing supported by appropriate infrastructure ❸ Improving connectivity and reducing traffic impacts | <ul style="list-style-type: none"> ❹ Improving access to sustainable transport ❺ minimising landscape impact and protecting the natural, historic and built environment ❻ Managing flood risk |
|--|--|

Strategic Area D: Strategic Site Options D1, D3, D4, D7

	Steps 1 and 2	Step 4 : Sustainability Appraisal	Step 5: SWOT Assessment				Step 6			
Strategic Site Option	Strategic Area Sustainability Issues	Adverse environmental effects on ..	Strength	Opportunity	Threat	Weakness	Fit with Development Concepts	Rejected or Accepted	Reason	Alternative Development Concept
D1	Poorly related to A350 and town centre. Visually prominent from surrounding high ground	Less sustainable options for development MODERATE Air quality Climate change Land Economy Employment MINOR Biodiversity	②	② ⑤		① ③ ④	☐	☐	Limited support for an employment led strategy, multiple weaknesses in relation to policy requirements and poor fit with development strategies	

	Steps 1 and 2	Step 4 : Sustainability Appraisal	Step 5: SWOT Assessment				Step 6			
Strategic Site Option	Strategic Area Sustainability Issues	Adverse environmental effects on ..	Strength	Opportunity	Threat	Weakness	Fit with Development Concepts	Rejected or Accepted	Reason	Alternative Development Concept
		Water resources Landscape								
D3	Poorly related to A350 and town centre. Visually prominent from surrounding high ground	Less sustainable options for development MODERATE Air quality Climate change Land Economy Landscape		① ② ③	⑤ ② ④		✓	☐	As with other strategic site options in Strategic Area D there is limited support for an employment led strategy. It is similar in its affects as Strategic Site Option D7 which provides the benefits of access to the	

	Steps 1 and 2	Step 4 : Sustainability Appraisal	Step 5: SWOT Assessment				Step 6			
Strategic Site Option	Strategic Area Sustainability Issues	Adverse environmental effects on ..	Strength	Opportunity	Threat	Weakness	Fit with Development Concepts	Rejected or Accepted	Reason	Alternative Development Concept
		MINOR Biodiversity Water resources Heritage							A350 as part of a smaller site. D3 should be considered as part of a longer term plan as it cannot be developed without preceding investment in infrastructure .	
D4	Poorly related to A350 and town centre. Visually prominent from surrounding high ground	Less sustainable options for development MODERATE	2	3 2 5	5	1 3 4	☐	☐	Limited support for an employment led strategy, multiple weaknesses	

	Steps 1 and 2	Step 4 : Sustainability Appraisal	Step 5: SWOT Assessment				Step 6			
Strategic Site Option	Strategic Area Sustainability Issues	Adverse environmental effects on ..	Strength	Opportunity	Threat	Weakness	Fit with Development Concepts	Rejected or Accepted	Reason	Alternative Development Concept
		Air quality Climate change Land Employment Landscape MINOR Biodiversity Water resources							in relation to policy requirements and poor fit with development strategies	
D7	Poorly related to A350 and town centre. Visually prominent from surrounding	More sustainable option for development		① ③	① ② ④ ⑤		✓	✓		SLR

	Steps 1 and 2	Step 4 : Sustainability Appraisal	Step 5: SWOT Assessment				Step 6			
Strategic Site Option	Strategic Area Sustainability Issues	Adverse environmental effects on ..	Strength	Opportunity	Threat	Weakness	Fit with Development Concepts	Rejected or Accepted	Reason	Alternative Development Concept
	high ground.	MODERATE Climate change Land Landscape Biodiversity Heritage MINOR Air quality Water resources								

- ❶ Delivering economic growth
- ❷ Providing housing supported by appropriate infrastructure

- ❸ Improving access to sustainable transport
- ❹ Minimising landscape impact and protecting the natural, historic and built environment
- ❺ Improving access to sustainable transport minimising landscape impact and protecting the natural, historic and built environment

⑤ Improving connectivity and reducing traffic impacts

⑥ Managing flood risk

Strategic Area E: Strategic Site Options E1, E2, E3, E5

Strategic Site Option	Steps 1 and 2 Strategic Area Sustainability Issues	Step 4 : Sustainability Appraisal Adverse environmental effects on ..	Step 5: SWOT Assessment				Step 6			
			Strength	Opportunity	Threat	Weakness	Fit with Development Concepts	Rejected or Accepted	Reason	Alternative Development Concept
E1	Well-related to the A350 for employment delivery. Limited transport and landscape impacts. Heritage constraints	More sustainable option for development MODERATE Land MINOR Biodiversity Water resources Air quality Heritage Community	1 3 4	5	5 2		✓	✓		SLR

	Steps 1 and 2	Step 4 : Sustainability Appraisal	Step 5: SWOT Assessment				Step 6			
Strategic Site Option	Strategic Area Sustainability Issues	Adverse environmental effects on ..	Strength	Opportunity	Threat	Weakness	Fit with Development Concepts	Rejected or Accepted	Reason	Alternative Development Concept
E2	Well-related to the A350 for employment delivery. Limited transport and landscape impacts. Heritage constraints	More sustainable option for development MODERATE Land MINOR Biodiversity Water resources Air quality Heritage Community	1 3 4	3 5	5 2		✓	✓		Mixed Strategy

	Steps 1 and 2	Step 4 : Sustainability Appraisal	Step 5: SWOT Assessment				Step 6			
Strategic Site Option	Strategic Area Sustainability Issues	Adverse environmental effects on ..	Strength	Opportunity	Threat	Weakness	Fit with Development Concepts	Rejected or Accepted	Reason	Alternative Development Concept
E3	Well-related to the A350 for employment delivery. Limited transport and landscape impacts. Heritage constraints	More sustainable option for development MODERATE Land Landscape MINOR Biodiversity Water resources Air quality Heritage Community	1 3	3 5	5 2	4	✓	<input type="checkbox"/>	Extends development furthest south and is the least preferred option in relation landscape impact encroaching on more remote and attractive environments and contains the largest amount of land in a location with weak access to the town centre,	

	Steps 1 and 2	Step 4 : Sustainability Appraisal	Step 5: SWOT Assessment				Step 6			
Strategic Site Option	Strategic Area Sustainability Issues	Adverse environmental effects on ..	Strength	Opportunity	Threat	Weakness	Fit with Development Concepts	Rejected or Accepted	Reason	Alternative Development Concept
									railway centre and leisure facilities	
E5	Well-related to the A350 for employment delivery. Limited transport and landscape impacts. Heritage constraints	More sustainable option for development MODERATE Land MINOR Biodiversity Water resources Air quality	1 3 4	3 5	2 5		✓	✓		SLR

Steps 1 and 2		Step 4 : Sustainability Appraisal	Step 5: SWOT Assessment				Step 6			
Strategic Site Option	Strategic Area Sustainability Issues	Adverse environmental effects on ..	Strength	Opportunity	Threat	Weakness	Fit with Development Concepts	Rejected or Accepted	Reason	Alternative Development Concept
		Heritage Community Landscape								

- | | | | | | | | | | | | |
|---|----------------------------|---|---|---|---|---|---|---|--|---|---------------------|
| ❶ | Delivering economic growth | ❷ | Providing housing supported by appropriate infrastructure | ❸ | Improving connectivity and reducing traffic impacts | ❹ | Improving access to sustainable transport | ❺ | minimising landscape impact and protecting the natural, historic and built environment | ❻ | Managing flood risk |
|---|----------------------------|---|---|---|---|---|---|---|--|---|---------------------|

Conclusion

- 6.28 Comparing the extent of adverse impacts for each strategic site option identified in the SA and clustering the strengths and weakness each site has in relation to the CP10 criteria begins to give a picture of the stronger and weaker strategic site options. The assessment of site options suitability indicates that strategic site options A1, C2, C3, D1, D3, D4 and E3 are not suited to be taken forward as potential component parts of alternative development strategies.
- 6.29 For site options A1 and C2 the Sustainability Appraisal has identified a major adverse effect which is not possible to mitigate. Significant harm to biodiversity interests resulting from development in Site Option A1 cannot be adequately mitigated and may well be avoided through the locating development on an alternative site with less harmful impacts. The same circumstance affects site option C2 but in terms of the harmful visual impact of development. As the Sustainability Appraisal suggests, other locations, therefore provide sites more suited to growth without major adverse impact and should be preferred.

Strategic Site Option A1 – SA conclusions

- 6.30 *‘The assessment results for this option identify the presence of one major adverse effect (with mitigation not considered possible). This relates to environmental objective SO1 and arises out of the cumulative effects the adjacent permitted development site and Option A1 would have on the Birds Marsh Wood County Wildlife Site (CWS). The green space proposed at Option A1 would not provide sufficient mitigation to adequately prevent harm to the CWS. As a result of this important issue, it is recommended that this site should not be taken forward’.* (paragraph 1.2.1, Part 2 SA)

Strategic Site Option C2 – SA conclusions

- 6.31 *Option C2 represents a large site option. The greater scale of development results in major adverse effects in terms of visual impacts upon the landscape character of a wide area. The large proportion of development proposed in the sensitive Marden Valley also suggests that mitigation cannot be achieved when so much development will affect the whole landscape character of the valley and the extent of development also encroaches into the setting of Tytherton Lucas Conservation Area (SO7). As a result of these important issues, it is recommended that this site option should not be taken forward.* (paragraph 1.5.1, Part 2 SA)
- 6.32 Site options A1, C3, D1 and D4 are particularly not suited to supporting an employment led strategy given their existing relationship with the existing highway network and strategic employment sites. Opportunities to improve the attractiveness of these locations for business are extremely limited. For example strategic site options D1 and D4 would not benefit from the improved location that can be achieved through the completion of a Southern Link Road without being combined with other strategic site options to create a much larger development. There are more appropriate locations within Strategic Area D.

Strategic Site Options D1 and D4 – Policy assessment conclusions in relation to economy and transport

- 6.33 This site is not located in the A350 corridor. Access is via the A4, and through the town centre. Development places significant pressure on the A4 corridor. Individually they do not facilitate a Southern Link Road and so there is no opportunity to create better relationship with the A350 corridor and thereby increase its attractiveness to employers.
- 6.34 These sites overall have weak potential to offer wider transport benefits to the community as it is located close to congested corridors and has moderate non motorised access to the town centre. On their own these sites do not provide the opportunity to create a southern link road to improve access to the A350 and reduce the potential impact of development on existing congested corridors.
- 6.35 Strategic site option D3 does facilitate the possibility of a Southern Link Road but the opportunity to capitalise on the potential to provide this road is better represented by strategic site option D7 because of the scale of growth proposed. In combination with the development in Strategic Area E needed to facilitate the southern link road the SLR strategy would be proposing close to 3000 homes which is well in excess of the residual plan requirement if Strategic Site Option D3 were taken forward.

Strategic Site Option E3 – Policy assessment conclusion

- 6.36 Extends development furthest south and is the least preferred option in relation landscape impact encroaching on more remote and attractive environments and contains the largest amount of land in a location with weak access to the town centre, railway centre and leisure facilities
- 6.37 Strategic site option E3 would also involve a scale of development that would concentrate land supply on one location to the detriment of housing choice and prospects for achieving rates of development sought to meet indicative requirements.

Alternative Development Strategies

- 6.38 Table 6.2 below summarises the conclusions of the assessments, highlighting site options that are suited to being taken forward as potential component parts of alternative development strategies.

Table 6.2: Strategic site options taken forward

Site	Fit with development concept	Accepted or Rejected	Development Concept
A1	?	<input type="checkbox"/>	
B1	<input type="checkbox"/>	<input type="checkbox"/>	ELR Mixed Strategy Dispersed

Site	Fit with development concept	Accepted or Rejected	Development Concept
C1	<input type="checkbox"/>	<input type="checkbox"/>	ELR Mixed Strategy Dispersed
C2	<input type="checkbox"/>	<input type="checkbox"/>	
C3	?	<input type="checkbox"/>	
C4	<input type="checkbox"/>	<input type="checkbox"/>	ELR Dispersed
D1	<input type="checkbox"/>	<input type="checkbox"/>	
D3	<input type="checkbox"/>	<input type="checkbox"/>	
D4	<input type="checkbox"/>	<input type="checkbox"/>	
D7	<input type="checkbox"/>	<input type="checkbox"/>	SLR
E1	<input type="checkbox"/>	<input type="checkbox"/>	SLR Dispersed
E2	<input type="checkbox"/>	<input type="checkbox"/>	Mixed Strategy Dispersed
E3	<input type="checkbox"/>	<input type="checkbox"/>	
E5	<input type="checkbox"/>	<input type="checkbox"/>	SLR Dispersed

6.39 Having regard to the concepts outlined in Step 2 earlier, the strategic site options taken forward would produce the following scales of development against each of the development concepts:

A350 Corridor

6.40 Rejection of site option A1, primarily on environmental grounds, removes the possibility of a pattern of development following the A350 corridor concept in so far as providing a choice of sites in both strategic areas A and E together. The most

appropriate location for further employment development associated with the A350 corridor has already been permitted as part of the North Chippenham planning application.

- 6.41 Possible site options in Area E could approach strategic requirements for residential development in terms of scale on its own. However, it is unlikely that such a focus on one major extension would deliver the rate of housing development necessary over remaining years of the plan period to deliver the core strategy requirements by 2026. Especially as the larger a site involves more individual land owners. One extension would also not have the benefit of a marked choice of locations for home buyers.
- 6.42 None of the original strategic site options in Strategic Area E indicated additional land for business over and above that envisaged at Showell Farm. It would not seem likely that there would be adequate provision for the scale, rate and choice of employment development sought over the plan period if a strategy focuses on a single urban extension. An A350 corridor concept is therefore not judged to be a reasonable alternative development strategy.

An Eastern Link Road

- 6.43 Strategic Site Options B1 and C4 provide for the scale of housing development required over the plan period. The choice of site options in different locations offers the prospect of delivering multiple outlets which also enhances the likelihood of delivering the strategic housing requirements over the plan period.
- 6.44 These site options, however, (as presented in Appendix 4 - Identification of alternative strategic site options) do not provide for the scale of employment development sought. If the scale of employment land could be increased in one or other site then this concept need not be abandoned.
- 6.45 The visual prominence of site option B1, does not recommend the option for a significantly greater scale of employment development than considered thus far when compared to the larger area of land proposed in strategic site option C4. This site provides greater scope, borne out by the fact that other site options under consideration in Strategic Area C provide significantly more land for employment development. An Eastern Link Road Strategy is therefore judged to be a reasonable alternative development strategy.
- 6.46 The strategy relies on linking to the development committed at North Chippenham and therefore the co-ordination of three main areas for development and a number of land owning interest. It involves the provision of big ticket items notably in the form of river and railway bridges that are necessary to support the development involved.
- 6.47 Assessments indicate a number of environmental considerations which must be addressed when considering this option, notably development avoiding adverse effects on the River Avon and the particular potential for harmful impacts on the wider landscape from development in the Marden Valley and to heritage assets.

Southern Link Road

- 6.48 Site options D7 and E5 exceed strategic land requirements for both new dwellings and land for employment development. Site option E5 includes land parcels that would be enveloped as the urban area extends southwards. The approach responds to the recommendation of SA for a more compact development pattern. Site option E5 would however provide a more coherent and logical approach to development, recognising the wider implications of extending the urban area. A larger allocation is therefore justifiable
- 6.49 The overall scale of development, however, exceeds indicative requirements. One developer interest predominates in strategic area E and less land could be allocated in Area E based on the proposition of this 'main site'. No developer is yet promoting site option D7 and there are several land ownership obstacles to resolve as well as the need to undertake much more detailed investigations of the site. Assuring a selection of different developers within strategic area E improves possibilities for supply achieving the rates of house building sought as a plan objective.
- 6.50 Although one developer interest predominates and smaller sites toward the periphery might complicate delivery, this does not seem to represent an insuperable barrier.
- 6.51 Site option D7 has potential land ownership risks to delivery. Whilst the majority of the land holding is in one ownership other parties hold land at the River Avon necessary to provide a link road bridge. Site option D7 would need to extend to the bank of the River Avon. There is also a third ownership in a similar controlling position with respect to an access on to Pewsham Way.
- 6.52 Again, there are clear risks to delivery, this time focussed largely on land in Area D, because of the dependence of land on the co-ordination of a number of land owners. Also there are exceptional costs around bridging the River Avon.
- 6.53 Notable environmental considerations are the need to preserve the character and setting of Rowden conservation area and listed buildings. Development must also avoid adverse effects on the River Avon. However, the Southern Link Road strategy is judged to be a reasonable alternative development strategy even though the scale of growth proposed would exceed the minimum housing land requirements. The scale of growth is to support necessary infrastructure.

Mixed Strategy

- 6.54 Site options E2, B1 and C1 represented the pattern of development proposed in this concept and taken forward in the submitted plan. These proposals exceed strategic land requirements although some land would be expected to be delivered after the plan period or specifically reserved for use beyond 2026.
- 6.55 The submitted plan strategy proposes development in strategic area E, because this provides immediate employment land, while at the same time planning to deliver an Eastern Link Road (through sites B1 and C1) justified as the means to manage the impacts of growth and deliver a key item of road infrastructure to support the town's growth as a whole.
- 6.56 The submitted plan strategy would tackle most of the environmental considerations of both southern and eastern link strategies. It would carry the delivery risks surrounding provision of an Eastern Link Road. Assessments indicate a number of

environmental considerations which must be addressed when considering this option, notably development avoiding adverse effects on the River Avon and the particular potential for harmful impacts on the wider landscape from development in the Marden Valley and to heritage assets. Notable environmental considerations also include the need to preserve the character and setting of Rowden conservation area and listed buildings.

- 6.57 A less ambitious mixed strategy would be to include allocated sites to deliver the plan requirements for both housing and employment land which do not prevent the longer term expansion of Chippenham (effectively paving the way for future growth). This would mean deferring proposals east of the River Avon for a decision to be considered in the next plan period. Whilst site option C1 seeks to minimise development and adverse impacts from development on the Marden Valley, it contemplates development in this area nonetheless alongside the construction of a link road and river bridge.
- 6.58 A strategy involving site option E5, as described above, and B1 would also deliver the scale of development needed over the plan period with potentially less risk.
- 6.59 It is therefore considered that there are two reasonable alternative development strategies which could be referred to as mixed strategies. These are the submitted plan strategy (strategic site options E2, B1 and C1) and a mixed strategy (strategic site options E5 and B1).

Dispersed Strategy

- 6.60 A dispersed strategy envisaged development in all the strategic areas, according to all the developers’ individual plans. There are several planning applications currently being promoted. Two involve site options A1 and D1. Each of these has been rejected as a conclusion of site assessment. This removes the need to consider a dispersed strategy because other site options are considered as part of other alternative development strategies.

Conclusion – Selected Alternative Development Strategies.

- 6.61 Four alternative development strategies can, in principle, meet strategic land requirements, based on the following site options

Table 6.2: Reasonable Alternative Development Strategies taken forward

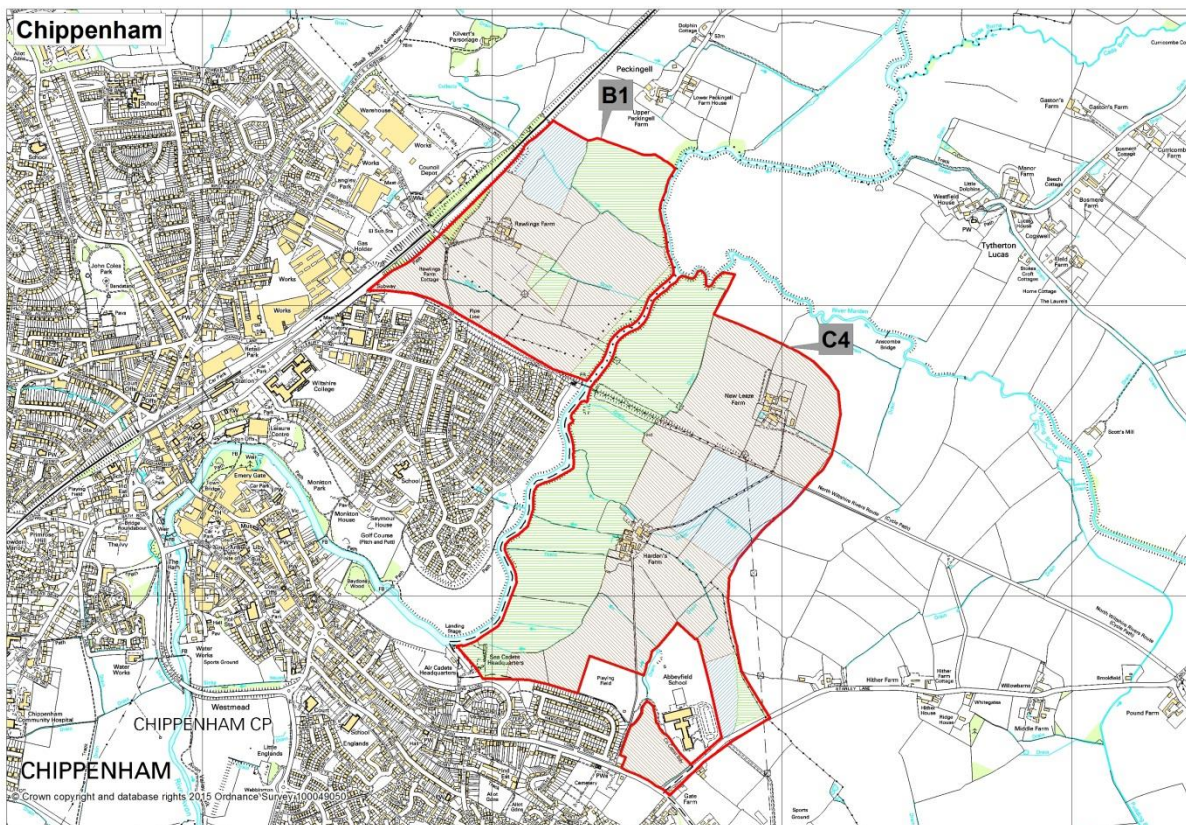
Strategy Name	Site Option	Employment (ha)	Housing
An Eastern Link Road	B1 and C4	21.00	2000
Southern Link Road	D7 and E5	28.60	2450
Submitted Plan	B1, C1 and E2	28.10 (+15 post 2026)	2500
Mixed	B1 and E5	23.00	2050

- 6.62 Each of these strategies has been worked up in more detail, explained and shown below. In terms of the scales of growth proposed the Eastern Link Road Strategy and the Mixed Strategy are similar and are more closely aligned to the ‘at least’

development requirements of the Wiltshire Core Strategy (about 5% contingency over the core strategy housing requirement).

- 6.63 The Submitted Strategy and the Southern Link Road Strategy are more ambitious and seek to provide longer term settlement resilience for Chippenham though the delivery of new infrastructure (about 16% contingency over the core strategy housing requirement). They remain reasonable alternatives because it is important to test the potential social and economic benefits of a larger scale of growth against the potential environmental harm in order to understand how best to promote sustainable development at Chippenham.
- 6.64 The scale of development provided by a Southern Link Road strategy recognises the uncertainty and greater time that might be needed to deliver a site option that has so far not been promoted for development, site option D7. It balances this factor by improving prospects for supply in strategic area E.
- 6.65 The scale of development provided by the Submitted Plan is an employment-led strategy justified by aiming to achieve social and economic benefits as soon as possible; by providing employment land for immediate needs and by ensuring a continuity of supply for the future as well as resulting in an Eastern Link Road built by 2026.
- 6.66 Supporting evidence for each alternative includes understanding traffic impacts, viability assessment and an assessment of risks to delivery associated with each development strategy. Each alternative strategy can therefore be tested as to whether it has a reasonable prospect of delivery.

An Eastern Link Strategy



Allocations

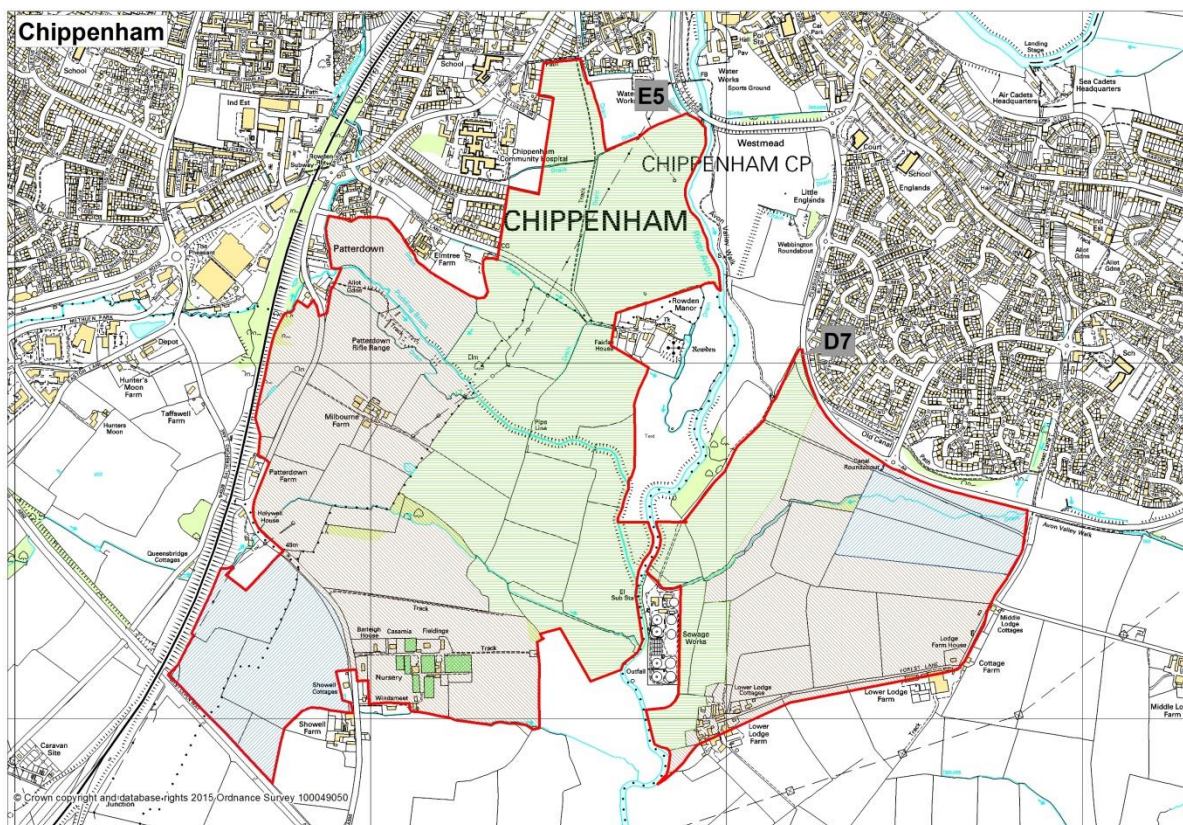
- 6.67 The Eastern Link Strategy is based around the delivery of two new allocated sites; strategic site options C4 and B1 alongside development already permitted at North Chippenham.
- 6.68 Site options B1 and C4 are each being promoted for development by their respective landowners and are subject to current planning applications. Together they are proposing up to 2,200 dwellings and approximately 15ha of land for employment development.
- 6.69 Assessments of site options C highlight the landscape sensitivity of land north of the North Wiltshire Rivers Way in terms of its visual prominence in the wider landscape and degree of intrusion into a rural area; visual impact, noise and light pollution are areas of concern. Evidence suggests that where development does take place it should be designed within a strong landscape framework and at a lower density. It would also seem appropriate to avoid locating employment uses in this area if there are better opportunities within the site.
- 6.70 Whilst the site options meet the scale of land for housing required over the plan period, the scale of employment land promoted in planning applications, however, is 6ha less than the amount required. Other site options in strategic area C show that there are possibilities for a greater scale of employment development and that additional employment land can therefore be indicated south of the North Wiltshire Rivers Way.
- 6.71 To compensate for the loss of land to employment uses, other land for residential development can be added to the site, at Landers Field. This site constitutes additional land that would be enveloped within the urban area as a result of developing site option C4. The site has already been included as a part of other site options.
- 6.72 The strategy proposals therefore take a conservative view of development densities on site options B1 and the area north of the North Wiltshire Rivers Way and require layout and design to be set within a strong landscape framework
- 6.73 Site option B1 represents, according to the results of the landscape assessment, the most prominent location for development in the vicinity of the town. To counteract visual, light and noise pollution, development should take place at a lower density throughout the site and within a strong strategic landscape framework. An additional area of indicative green space is proposed on the northern side as a main individual component of such a framework providing a substantial northern boundary to the site in order to create an acceptable impact.
- 6.74 Landscape impact also constrains the type of employment premises the site should accommodate. The site's location in reasonable proximity to the town centre suggests that a more flexible range of employment uses would be appropriate if they complement and do not serve to undermine the vitality and viability of the town centre. In these circumstances it might not be appropriate to indicate an area of land but require that a total of 5ha of land be provided for employment development but allow for it, if necessary, to be dispersed around the development.

- 6.75 Taking account of these design elements and an increase in the proposed amount of employment land, the scale of residential development provided by this strategy is much less than scales currently envisaged by developers.
- 6.76 As indicated in the transport evidence²⁹, site option B1 will require two access points one from Monkton Park and a second via a link over the railway from Parsonage Way, and ultimately a connection to development permitted at North Chippenham. Without mitigation in the form of an Eastern Link Road connecting the A4 to the A350, relying on development of site option B1, all development of site option C4 would need to be served by the A4.
- 6.77 Development would need to be supported by two new primary schools, one on each site. The development of site B1 could also accommodate growth in primary pupil numbers at North Chippenham. Land would be reserved within site C4 to allow for the future expansion of Abbey field School.
- 6.78 The proposals deliver 56.4ha of land for green space that would constitute a riverside park realising a long term ambition to make greater use of the potential of this corridor for informal recreation, new cycle and footpaths

Site	Employment (ha)	Residential (dwellings)	Green space (ha)	Infrastructure requirements Other comments
Rawlings Green (B1)	5	650	17	Cocklebury Link Road 1 2FE Primary School Housing numbers reduced from 730 indicated in the original strategic site option to respond to landscape and heritage constraints
East Chippenham (C4)	16	1350	39.4	Eastern Link Road (including River Avon bridge) 1 2FE Primary School 2.5ha land reserved for the expansion of Abbeyfield School Employment land increased from 10.08 hectares indicated in the original strategic site option and housing numbers increased to reflect higher densities and the inclusion of Landers Field.
TOTAL	21	2000	56.4	

²⁹ Supplement to Transport and Accessibility Evidence: Part 1a: Strategic Site Options

A Southern Link Road Strategy



Allocations

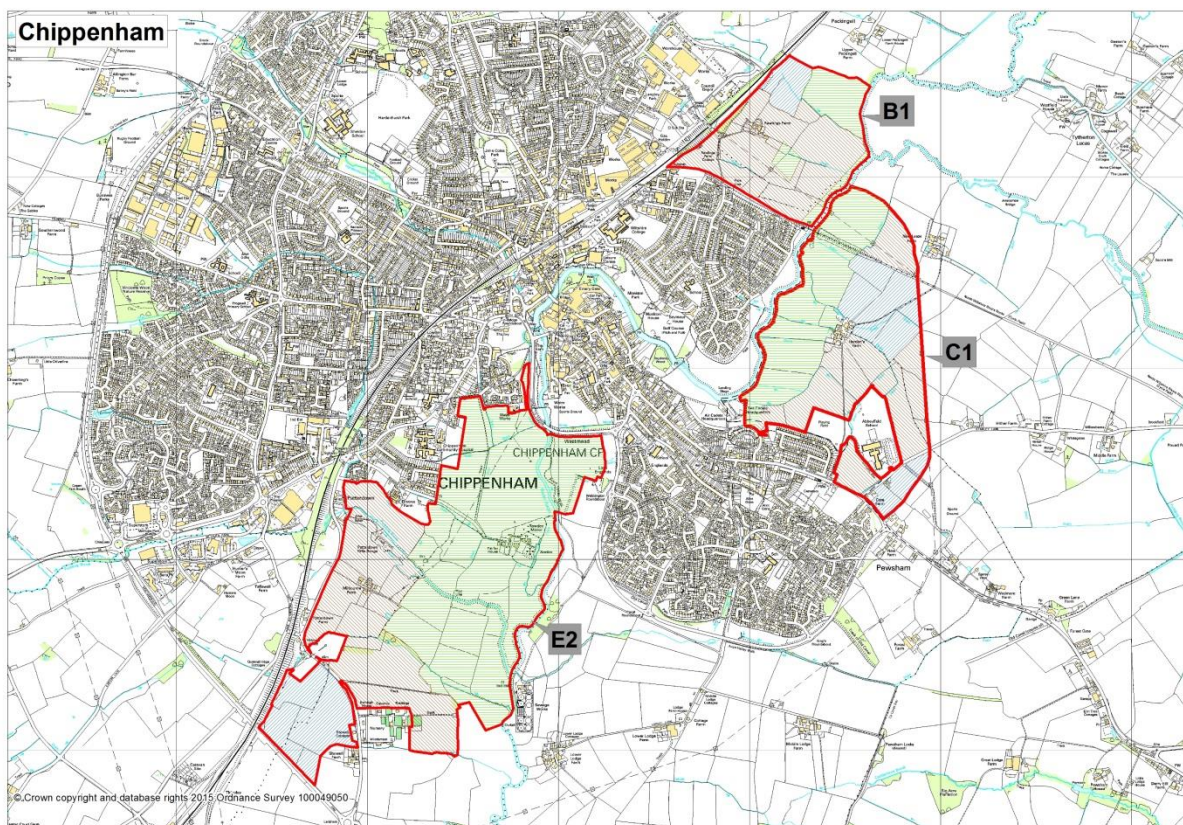
- 6.79 A Southern Link Road strategy is based on allocating strategic site options E5 and D7.
- 6.80 Site option E5 represents the largest of all the site options being taken forward and requires a range of new facilities to serve it. Proposals will need to include provision for a 2 form entry school and a local centre providing for shops and services to the neighbourhood.
- 6.81 The E5 site would involve building out from the edge of Chippenham and the main area divides into a number of sub areas
- west of the B4528
 - east of the B4528
 - Showell Nurseries
- 6.82 Each would be able to take access from the B4528 and be delineated by existing features such as Pudding Brook. This would support the aim of compact development sought by sustainability appraisal as well as help create interest and appropriate scale local environments. It is anticipated that the whole of strategic site option E5 will not be delivered within the plan period.
- 6.83 Traffic mitigation in relation to site option E5 would be in the form of improvements to the existing highway network and enabling the unfettered access from the B4528 to land to the east over the river. Whilst access to strategic site option D7 would be

from Pewsham Way, traffic mitigation would include the delivery of a southern link connecting the A4 at Pewsham to the A350.

- 6.84 A single developer interest predominates on a 'main site' and further sites will be developed that involve land parcels enveloped as the urban area extends. This includes the redevelopment of the nursery. A master plan solely for the main site will be sufficient to lead development of the whole allocation. The size, character and location of further sites does not merit one comprehensive master plan. This might delay delivery unnecessarily. Further sites can be developed independently provided, functionally, they demonstrate that they integrate with the main site in terms of meeting local community needs and traffic management
- 6.85 Extensions to each site would require additional green space, reflecting flood risk and also their position in relation to the Rowden Conservation Area and setting to listed buildings such as Rowden Manor.
- 6.86 The proposals deliver 90ha of land for green space that would constitute a riverside park realising a long term ambition to make greater use of the potential of this corridor for informal recreation, new cycle and footpaths.
- 6.87 Development would need to be supported by two new primary schools, one on each site.

Site	Employment (ha)	Residential (dwellings)	Green space (ha)	Infrastructure requirements
South of Pewsham (D7)	10.5	1050	15.5	1 2FE Primary School Southern Link Road (inc R Avon bridge) Housing numbers increased form 805 indicated in the original strategic site option to reflect higher net density.
South West Chippenham (E5)	18.1	1400	75.4	1 2FE Primary School Southern Link Road
TOTAL	28.6	2450	90.9	

Submitted Plan



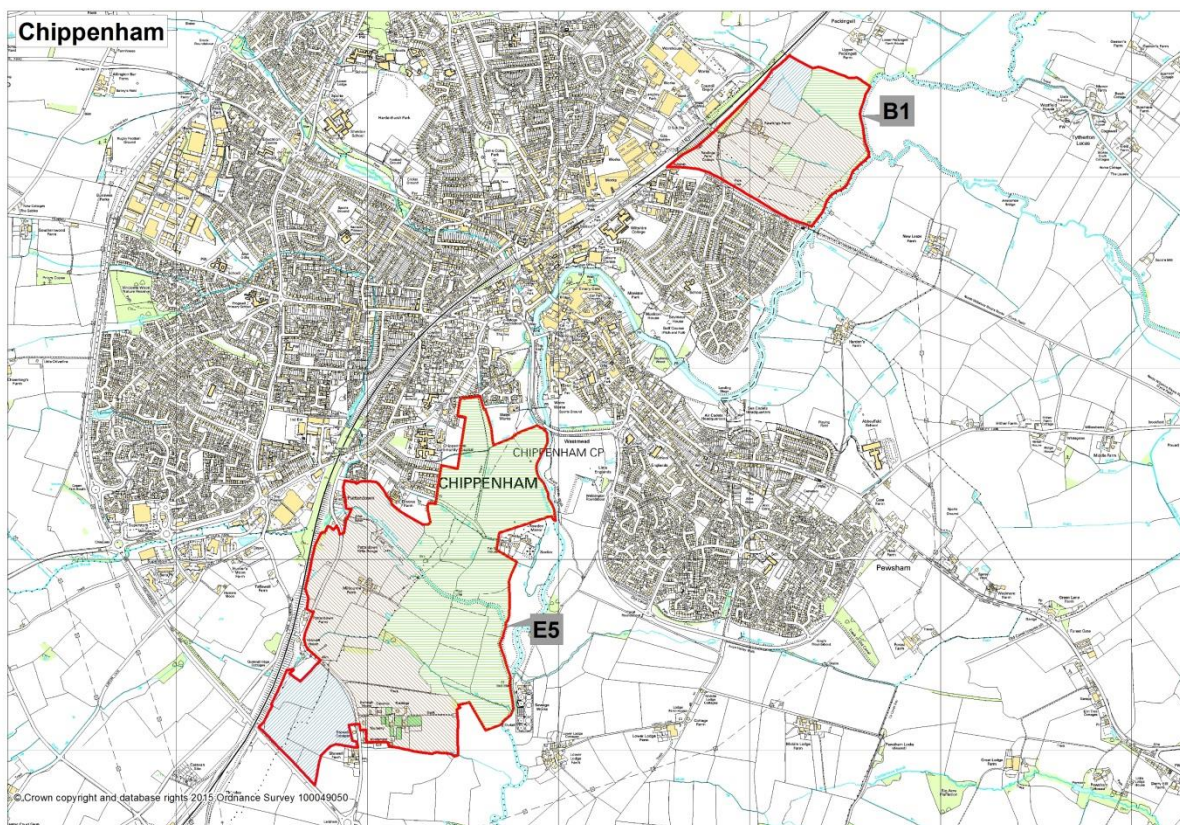
Allocations

- 6.88 The submitted Plan proposals are based on site options B1, C1 and E2.
- 6.89 Each of these site options are the subject of current planning applications, although a greater amount of development is being promoted in strategic area C.
- 6.90 Site option B1 in this strategy duplicates proposals in both the Eastern Link and Mixed Strategy. As for the Eastern Link Road strategy, the development of site option B1 would provide a link road from development at North Chippenham to Cocklebury Road.
- 6.91 Option C1 proposes limited development within the Marden Valley north of the North Wiltshire Rivers Way. 5ha of employment land is allocated during the plan period with a further 15 ha reserved for future employment development based on the potential accessibility and attractiveness of this location once an eastern link road is completed to the A350 corridor.
- 6.92 Option E2 reflects the extent of land promoted by current developers with the aim of providing a less complex and more certain, speedier route for delivery. This choice balances the more complex delivery issues that need to be managed with regard to site options B1 and C1. Similar to site option E5, however, it is not anticipated that the entire site will be completed within the plan period. Site option E2 should not prejudice provision of a link road to the south and east connecting to the A4, but it would not be necessary to safeguard land through the development plan, in so far as allocating land, until such a proposal, if justified, became more certain.

- 6.93 Development would need to be supported by three new primary schools, one on each site and local centres in both South West and East Chippenham sites. Land would be reserved for the expansion of Abbeyfield School.
- 6.94 The proposals deliver 155 ha of land for green space that would constitute a riverside park realising a long term ambition to make greater use of the potential of this corridor for informal recreation, new cycle and footpaths.
- 6.95 Notable environmental considerations include the need to preserve the character and setting of Rowden and Tytherton Lucas conservation areas and other heritage assets prevalent on each proposed allocation.

Site	Employment (ha)	Residential (dwellings)	Green space (ha)	Infrastructure requirements
Rawlings Green (B1)	5	650	17	Cocklebury Link Road 1 2FE Primary School Housing numbers reduced form 730 indicated in the original strategic site option to respond to landscape and heritage constraints
East Chippenham (C1)	20	850	35	Eastern Link Road (including River Avon bridge) 1 2FE Primary School 2.5ha land reserved for the expansion of Abbeyfield School Housing numbers increased from 775 indicated in the original strategic site option to reflect submitted plan.
South West Chippenham (E2)	18	1000	103	1 2FE Primary School Housing numbers reduced form 1140 indicated in the original strategic site option to respond to heritage constraints
TOTAL	43	2500	155	

Mixed Strategy



Allocations

- 6.96 A Mixed Strategy represents a less ambitious version of the submitted plan, recognising the greater potential for development south of Chippenham is based site options B1 and E5.
- 6.97 Proposals for each site duplicate those for each site option in other strategies. It would be necessary to ensure neither site option prejudiced provision of a link road either to the south or east connecting to the A4, but it would not be necessary to safeguard land through the development plan, in so far as allocating land, until proposals for one or other became more certain.
- 6.98 Development would need to be supported by two new primary schools, one on each site.
- 6.99 The proposals deliver 92.4 ha of land for green space that would constitute a riverside park realising a long term ambition to make greater use of the potential of this corridor for informal recreation, new cycle ways and footpaths.

Site	Employment (ha)	Residential (dwellings)	Green space (ha)	Infrastructure requirements
Rawlings Green (B1)	5	650	17	Cocklebury Link Road (...) 1 2FE Primary School Housing numbers reduced form 730

				indicated in the original strategic site option to respond to landscape and heritage constraints
South West Chippenham (E5)	18	1400	75.4	1 2FE Primary School
TOTAL	23	2050	92.4	

Next steps

Strategy name	Dwellings	Employment (ha)	Green space
Eastern Link Road	2000	21.0	56.4
Southern Link Road	2450	28.6	90.9
Submitted Plan	2500	43.1	155
Mixed	2050	23.1	92.4

- 6.100 Each of the strategies listed above will be tested through Sustainability Assessment supported by additional evidence in relation to the transport impacts of each³⁰, an understanding of viability³¹ and an understanding of the risks to delivery associated with each strategy.
- 6.101 The National Planning Policy Framework asks that plan preparation requires careful attention to viability and costs. Plans should be deliverable. Therefore, the sites and the scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened. Each alternative strategy involves significant infrastructure costs, including, in several cases, 'big ticket' items such as road and rail bridges. These elements must be deliverable alongside policy objectives, such as delivering affordable housing. (This is considered as part of Step 8: Selecting a preferred development strategy.)
- 6.102 Some strategies also depend for their delivery on the coordination of different land owners. A lack of co-ordination might lead to different impacts or completely prevent a strategy from being delivered at all. Such aspects need to be considered and risks like these addressed; looking at their likelihood, significance and what measures or contingencies might avoid, reduce or mitigate their impacts.
- 6.103 To develop a preferred strategy there will need to be an understanding of the risks associated with the delivery of each site. There is a straightforward, comparative risk assessment of each alternative development strategy and this is appendix 7. Findings are considered as part of Step 8: Identifying a preferred development strategy. Risks can include:

³⁰ Addendum to Evidence Paper 3: Transport and Accessibility Part 2a – Alternative Development Strategies (CEPS/05a)

³¹ Viability Assessment of Strategic Site Options

- Lack of agreement between land owners
- Ransom and co-ordination issues
- Cost of delivery of individual infrastructure projects
- Development left incomplete without road link
- Development cannot fund road and other infrastructure
- Surface water management issues
- SUDS do not decrease flood risk and possibly increase it)
- Landscape impacts are detrimental

7. Step 7 Sustainability Appraisal of Reasonable Alternative Development Strategies

Objective: To identify a development strategy that promotes the most sustainable pattern of development at Chippenham.

Introduction

- 7.1 Previous steps led to the formulation of four alternative development strategies (see previous chapter 6). Supporting a selection of sites and infrastructure proposals, the appraisal has had regard to viability and risk assessments of each strategy.
- 7.2 Sustainability Appraisal considers each of the alternatives using a set of sustainability objectives (SOs) and a framework using decision aiding questions to assess likely significant effects of each strategy under each objective.
- 7.3 The likely significant effects of each reasonable alternative development strategy are presented in full in part two of the addendums to the submitted draft sustainability appraisal.
- 7.4 The appraisal results in a set of judgments about each strategy and recommends a strategy to take forward based on achieving sustainability benefits across the spectrum of economic, social and environmental impacts than others. It also suggests amendments and additional areas for mitigation.

Summary of Conclusions

- 7.5 Likely effects are measured through a scale from major positive to major adverse (green through to red) against each sustainability objective question. They are presented in a summary table as reproduced as table 1 below.
- 7.6 The objectives are divided between socio-economic and environmental. As might be expected, broadly speaking, more positive effects are reported under socio-economic objectives and more negative effects under the environmental ones.
- 7.7 The appraisal concludes by saying:
“On the basis of the comparative assessments undertaken for the alternative strategies in the previous section, the following conclusions can be reached:
- 7.8 An analysis of the results (in table 1.7 – reproduced as figure 1 below) indicates that all alternative strategies present a mix of often common beneficial and adverse effects of varying scales and there is no single strategy that stands out as preferred for all three dimensions of sustainable development (environment, social and economic) simultaneously. For each strategy beneficial effects are more noticeable against socio-economic objectives whereas adverse effects are more prominent for the environmental objectives. The identification of preferred strategy(ies) is therefore reliant on finding the strategy(ies) that provides the best balance between environmental and socio-economic objectives.
- 7.9 It should be noted that the approach taken in order to identify the preferred strategy has been to focus on significant effects being predicted. These are moderate effects of problematic mitigation represented by orange cells in Table 1.7 (which should be minimised in a preferred strategy) and moderate and strong beneficial effects

represented by darker green cells in Table 1.7 (which should be maximised in a preferred strategy). This approach addresses the risk of placing more weight on some SA objectives than others because they have a higher number of criteria (e.g. SO2 Land has four criteria whereas SO8 Housing has only one) and focusses on the sustainability matters that are of strategic importance.

Commonalities between strategies

- 7.10 All alternative strategies are predicted to have moderate adverse effects of problematic mitigation for Greenfield and BMV land (SO2), due to the permanent loss of substantial quantities of BMV agricultural land as insufficient non-BMV land exists within each development strategy to deliver the scale of development proposed. This loss is considered inevitable.
- 7.11 All alternative strategies are predicted to have moderate adverse effects of problematic mitigation concerning the generation of increased carbon dioxide emissions (SO5a) from large scale development and vehicle emissions. This increase is considered inevitable given the large scale of development being proposed.
- 7.12 All alternative strategies are predicted to have equal potential for the generation of renewable energy (SO5a). All development sites proposed in the strategies hold the potential to support the delivery of on-site renewable or very low carbon generation. This could offset to some extent the predicted significant increase in carbon dioxide emissions but not sufficiently to reduce its significance.
- 7.13 All alternative strategies are assessed to have moderate effects deemed problematic to mitigate in terms of effects on heritage (SO6) and landscape character and visual amenity (SO7). Parts of the proposed development for all strategies would occur within lands which contribute to the open setting of nearby Conservation Area(s) and/or lands and listed buildings which are of an elevated nature and visually prominent and/or which contribute to the visual separation of Pewsham and Naish Hill.
- 7.14 All alternative strategies are predicted to share minor adverse effects regarding access by sustainable transport to proposed residential and employment areas (SO10, SO12). Improvements to public transport and non-motorised access would be required for the four strategies. These improvements are considered achievable.
- 7.15 All alternative strategies share minor adverse effects for water resources (SO3 Management measures would be needed to ensure greenfield rates of runoff or better and buffer zones between developable areas and small water courses such as Pudding Brook would be required. This is considered achievable.
- 7.16 All alternative strategies share minor adverse effects on air and environmental pollution (SO4). This is primarily due to a balance of beneficial and adverse effects being predicted as a result of the new link roads proposed in the various alternatives which will divert traffic from current hotspots, but the level of development proposed is expected to lead to a net increase in vehicles using the local roads resulting in minor adverse effects on air quality.
- 7.17 All alternative strategies share minor adverse effects for climate change vulnerability (SO5b) as development would largely be located in Flood Zone 1 in all

alternative strategies although, for some strategies, development near Pudding Brook would need to avoid Flood Zones 2 and 3 and river crossings would need to ensure floodwaters are not impeded. This is considered achievable.

Differences between strategies

- 7.18 All but the Mixed Strategy alternative are predicted to have moderate adverse effects with mitigation considered problematic associated with designated and undesignated sites of biodiversity and geological value (SO1). This relates primarily to the provision of a bridge crossing the River Avon and dissecting the River Avon County Wildlife Site for the other three strategies. While the design and alignment of the bridge can somehow reduce adverse effects on biodiversity, adequate mitigation of effects could be problematic because of the loss of the wildlife site habitats.
- 7.19 From an assessment perspective, prediction of minor adverse effects indicate that mitigation is possible and resulting effects will be minor (not significant), thus not a cause of concern. No effects being predicted aren't a cause of concern either. On the other hand, moderate adverse effects indicate that mitigation is problematic and might actually not work resulting in the occurrence of undesirable significant adverse effects. On this basis, the least number of moderate adverse effects a strategy presents the more preferred it becomes from a sustainability perspective.
- 7.20 The Mixed Strategy alternative demonstrates the least number of effects deemed problematic to mitigate against environmental objectives and as such is considered the preferred alternative from an environmental sustainability perspective.
- 7.21 From an assessment perspective and has highlighted earlier, prediction of moderate or major beneficial effects indicates that a strategy would have significant positive effects which are welcomed from a sustainability perspective.
- 7.22 The Submitted Strategy alternative provides the most major positive effects for socio-economic objectives (SO8, SO11 and SO12). This is due to the provision of a substantial quantum of dwellings (2500) and employment land (43.1 ha) and the provision of infrastructure that will help promote economic growth. It includes land with strong access to the PRN and a choice of locations in close proximity to Principal Employment Areas and existing employment areas. The quantum of employment land is approximately twice as much as for the other three strategies, as the strategy safeguards approximately 21.5 ha of employment land for the future in locations that are likely to become attractive to business in the next plan period. Without this additional employment land, the socio-economic benefits arising from the Submitted Strategy are comparable to those for the other strategies. The inclusion of this additional land and provision of dwellings above the residual requirement in the plan would result in additional Greenfield/BMV site development that may not be necessary at this stage to fulfil the development need at Chippenham. In addition, the river crossing associated with link road is the main cause for moderate adverse effects being identified for the biodiversity objective.
- 7.23 It should be noted that the fulfilment of the minimum residual housing and employment requirements (1780 dwellings and 21.5ha of employment land,) is understood as representing the development need for Chippenham.

- 7.24 On this basis, the ELR Strategy would deliver the least socio-economic benefits due to the quantum of employment land being proposed being smaller (21ha) than the minimum residual requirement (21.5 ha) and therefore its full potential has not been fulfilled through the proposed strategy. Although this shortfall could be addressed if this Strategy was to be taken forward, the ELR Strategy provides a choice of employment locations but relies on the provision of the ELR to bring land forward with strong access to the PRN. The river crossing associated with link road in the ELR Strategy is the main cause for moderate adverse effects being identified for the biodiversity objective.
- 7.25 The SLR Strategy and the Mixed Strategy provide very similar levels of socio-economic benefits across the socio-economic objectives, with the difference that the SLR Strategy provides major beneficial benefits for affordable housing (SO8) and for provision of infrastructure that will help promote economic growth (SO11) as opposed to moderate beneficial effects being identified for the Mixed Strategy. This is due to the larger quantum of dwellings and the link road proposed for the SLR Strategy. Both strategies include employment land with strong access to the PRN and a choice of locations but the SLR strategy relies on the provision of the SLR to improve access to the PRN for the delivery of all employment land. The river crossing associated with link road in the SLR Strategy is the main cause for moderate adverse effects being identified for the biodiversity objective and the provision of dwellings above the residual requirement associated with the SLR would result in additional Greenfield/BMV agricultural land being developed which may not be needed at this stage to fulfil development need in Chippenham. The Mixed Strategy doesn't present such issues.
- 7.26 Taking into account performance across the environmental and socio-economic objectives in order to find the preferred strategy together with the fulfilment of the minimum residual housing and employment requirements, it is considered that the Mixed Strategy is the alternative with the best sustainability performance and it is recommended as the preferred alternative. However, this would require satisfactory solution of the heritage and landscape adverse effects identified prior to taking this alternative forward"

Topic		Eastern Link Road	Southern Link Road	Submitted	Mixed
ENVIRONMENT					
Biodiversity	SO1				
	SO1				
Land	SO2				
	SO2				
	SO2				
	SO2				
Water resources	SO3				
	SO3				
Air and environmental pollution	SO4				
	SO4				
	SO4				
Climate change - emissions	SO5a				
	SO5a				
Climate change - vulnerability	SO5b				
SO5b					
Historic	SO6				
Landscape	SO7				
SOCIO-ECONOMIC					
Housing	SO8				
Community	SO9				
	SO9				
	SO9				
	SO9				
Sustainable transport	SO10				
	SO10				
Economy	SO11				
	SO11				
	SO11				
	SO11				
Employment	SO12				
	SO12				
	SO12				

Figure 7.1: Summary of Alternative Development Strategies Assessments Scores

Next Steps

- 7.27 The alternative development strategies will be compared on an equitable basis using a similar SWOT framework to the one used in Step 2. This will be informed by these Sustainability Appraisal results.
- 7.28 Selection of a preferred development strategy will have the goal of achieving social, economic and environmental benefits together. Reflecting an employment-led strategy, the selection of a preferred strategy will consider the alternative with the greatest net support for economic growth and settlement resilience.

8. Step 8: Selection of a preferred development strategy

Objective: to identify a preferred development strategy that delivers the Plan’s objectives informed by sustainability appraisal

Introduction

8.1 Previous steps have assessed a number of site options and broad strategic areas culminating in a set of four alternative development strategies for Chippenham named:

- An eastern link road
- A southern link road
- Submitted plan
- Mixed

8.2 The rationale and justification for these strategies is explained in step 6. Each strategy combines the following site options and delivers different scale of development:

Strategy name	Dwellings	Employment (ha)	Green space
Eastern Link Road Sites B1 and C4	2000	21.0	56.4
Southern Link Road Sites D7 and E5	2450	28.6	90.9
Submitted Plan Sites B1, C1 and E2	2500	43.1	155.0
Mixed Sites B1 and E5	2050	23.1	92.4

8.3 This step brings together the conclusions and recommendations of the Sustainability Appraisal of Alternative Development Strategies and the conclusions of a policy assessment of the alternative strategies which are compared on an equitable basis. As in previous steps the policy assessment is done using a similar SWOT framework to the one used in Step 2 and 5. The review also draws on the conclusions of a Risk Assessment carried out to inform the selection of a preferred alternative development strategy.

8.4 The central purpose of this step is to select a preferred development strategy with the goal of achieving social, economic and environmental benefits together. Reflecting the need for an employment-led strategy, the selection of a preferred strategy is however based on choosing the alternative with the greatest net support for economic growth and settlement resilience when compared to the potential for harm against Core Policy 10 criteria 2 to 6. Once the outcomes of the SA and SWOT analysis have been identified, the second half of this step identifies a

selected alternative development strategy and develops this into the preferred strategy for the Plan. This involves looking in more detail at the selected strategy, the recommendations of the SA and the sites proposed. It falls into two parts:

8.5 **Context and requirements** summarising how the Preferred Strategy needs to take account of:

- site constraints
- risks to delivery
- plan objectives
- the vision for Chippenham; and
- national planning policy

8.6 **Content:** the rationale for the content of the Preferred Strategy including how proposals are justified, meet Plan objectives and are consistent with the National Planning Policy Framework;

- meeting plan objectives;
- addressing site constraints; and
- delivery

Part 1: review summary and conclusions of SA and policy assessments

Summary and conclusions of SA

8.7 Considered in more detail in Chapter 7, Step 7, Sustainability Appraisal has reported the likely significant effects of each reasonable alternative development strategy and recommends the mixed strategy, based on achieving sustainability benefits across the spectrum of economic, social and environmental impacts. As well as advising on the likely significant effects of the mixed strategy the assessment also recommends several amendments or additional mitigations that might be attached to the delivery of the strategy to ensure a strategy's acceptability or realise particular sustainability benefits.

It concludes:

8.8 *"Taking into account performance across the environmental and socio-economic objectives in order to find the preferred strategy together with the fulfilment of the minimum residual housing and employment requirements, it is considered that the Mixed Strategy is the alternative with the best sustainability performance and it is recommended as the preferred alternative. However, this would require satisfactory solution of the heritage and landscape adverse effects identified prior to taking this alternative forward."*

Summary of SWOT assessment

8.9 Each of the alternative strategies is assessed against each one of the criteria contained in Core Policy 10. These are set out below with a comment on each to illustrate where there is potential for harm

Core Policy 10 Criteria	
Criteria	Possible harm
❶ The scope for the area to ensure the delivery of premises and/or land for employment development reflecting the priority to support local economic growth and settlement resilience	The strategy fails deliver substantial new jobs and land for business development
❷ The capacity to provide a mix of house types, for both market and affordable housing alongside the timely delivery of the facilities and infrastructure necessary to serve them	Lack of infrastructure, a poor mix of homes including affordable housing
❸ Offers wider transport benefits for the existing community, has safe and convenient access to the local and primary road network and is capable of redressing traffic impacts, including impacts affecting the attractiveness of the town centre	Poor traffic impacts on the local network, harm to the vitality and viability of the town centre because of congestion and little wider transport benefit
❹ Improves accessibility by alternatives to the private car to the town centre, railway station, schools and colleges and employment	Poor access to every day destinations by alternatives to the private car
❺ Has an acceptable landscape impact upon the countryside and the settings to Chippenham and surrounding settlements, improves biodiversity and access and enjoyment of the countryside	Poor impacts on the landscape, substantial harm to heritage assets and biodiversity
❻ Avoids all areas of flood risk (therefore within zone 1) and surface water management reduces the risk of flooding elsewhere	Increase flood risk

8.10 Sustainability Appraisal recommends the mixed strategy over the alternatives. A detailed SWOT assessment has assessed each of the alternative strategies. The results are sets out in **APPENDIX 8** and summarised below under each criteria.

8.11 ***1. The scope for the area to ensure the delivery of premises and/or land for employment development reflecting the priority to support local economic growth and settlement resilience***

8.12 The Eastern Link Road (ELR) Strategy has the weakest opportunities to ensure the delivery of a choice of premises for employment. The amount of land to be provided is less than the residual requirement. Although this could potentially be remedied by a layout for site option C4 corresponding to site option C1, the scale of employment provision for which this site option is being promoted is even less than is being suggested by this strategy. It would also create pressures for a higher density of

housing in order to achieve indicative requirements. The need for the most extensive new road infrastructure may have significant cost and time implications for the delivery of land. There would also be a delay to the delivery of employment land attractive to business pending the completion of the ELR when land is required as soon as possible.

- 8.13 The Southern Link Road (SLR) Strategy has moderate opportunities to ensure the delivery of a choice of premises for employment. 18ha of land could be provided without the delivery of significant infrastructure. The opportunity to provide for additional employment land would be improved with the completion of the SLR but, similar to the ELR strategy, this would involve a delay when there are more urgent needs for employment land.
- 8.14 The Submitted and Mixed Strategies both have good potential to ensure the delivery of a choice of premises for employment. They offer different locations matching different business needs of business from more traditional industrial uses that can be accommodated in SW Chippenham, as with the SLR strategy, but also edge of town centre business uses as at site option B1. They can do so relatively quickly and both strategies will provide more than the residual requirement, although the Submitted Strategy will provide more employment land and opportunities for a choice of employment premises over the longer term.
- 8.15 The timing and choice of sites is a strength of the Mixed and Submitted strategies. The delay and uncertainty around employment provision in ELR and SLR strategies are a weakness.
- 8.16 ***2. The capacity to provide a mix of house types, for both market and affordable housing alongside the timely delivery of the facilities and infrastructure necessary to serve them***
- 8.17 The overall amount of housing to be provided by each strategy exceeds the residual requirement and there is potential to provide a mix of house types for both market and affordable housing. The Eastern Link Road (ELR), Southern Link Road (SLR), and Submitted strategies all provide the opportunity to create or contribute towards a link road which will improve access to the A350 from the east of Chippenham and reduce the potential impact of development on existing congested corridors. However, the need for a link road may result in a delay to development in Sites B1, C1 and D7. i.e. only a limited number of homes and jobs can be created until a new link road is available. It may also affect the delivery of affordable housing on those sites. Sites E2 and E5 which are identified in the SLR, Submitted or Mixed Strategies are able to be delivered without a new link road enabling housing and jobs to be delivered early. The SLR Strategy includes Site D7 which currently is not being promoted and combined with the need for infrastructure is likely to lead to a low speed of delivery of the housing and facilities in this location. The Mixed Strategy includes Site E5 and B1 which enable housing to be delivered early. The Submitted Strategy 8 by also including Site C1 enables some housing to be delivered early and the eastern link road to be delivered in full to address congestion issues in the town.
- 8.18 The deliverability of land for housing development in SW Chippenham is a strength shared by the all the strategies except the ELR strategy. There are threats to the

delivery of housing arising from the added complexity of the significant infrastructure that this strategy needs in place which might delay development or create pressures to reduce proportions of affordable housing.

- 8.19 **3. Offers wider transport benefits for the existing community, has safe and convenient access to the local and primary road network and is capable of redressing traffic impacts, including impacts affecting the attractiveness of the town centre**
- 8.20 The Eastern Link Road Strategy and Submitted Strategy both provide the opportunity to create or contribute towards a link road which will improve access to the A350 from the east of Chippenham and reduce the potential impact of development on existing congested corridors. The Mixed Strategy performs slightly weaker as an opportunity because although it may contribute towards the production of an Eastern Link Road, it will not be provided in full.
- 8.21 Transport evidence indicates that the Eastern Link Road strategy provides greater benefit to the existing community than the Southern Link Road strategy.³² The Southern Link Road Strategy is predicted to potentially result in some poor traffic impacts in the local network and is therefore a threat.
- 8.22 **4. Improves accessibility by alternatives to the private car to the town centre, railway station, schools and colleges and employment**
- 8.23 All four strategies have a good relationship with the town centre and provide opportunities to improve access to key facilities by non-motorised transport. The Eastern Link Road Strategy, Submitted Strategy and Mixed Strategy all include Site Option B1 which in particular has a strong relationship with the railway station, college and leisure centre. The Southern Link Road Strategy, Submitted Strategy and Mixed Strategy all include sites which have weaker links with the railway station, college and leisure centre, however, there is potential for improved new walking and cycling links. The Eastern Link Road Strategy and Submitted Strategy both include an eastern link road which once completed could also improve access to the railway by car and/or public transport from the eastern side of Chippenham. However, the Eastern Link Road Strategy and Submitted Strategy sites options in strategic areas B and C are not particularly close to any existing GP surgeries, whereas the Southern Link Road, Submitted and Mixed strategies include site options that are nearer to the Community Hospital which is the location where there is a preference to provide additional capacity to relieve pressure on individual GPs surgeries. Access to secondary schools from site options in strategic area E are a weakness affecting Submitted, Mixed and SLR strategies, however site options E2 and E5 in terms of accessibility are assessed as good overall when considered alongside other destinations such as the town centre and railway station.
- 8.24 Each of the strategies present opportunities under this criterion to improve access to every day destinations by alternatives to the private car.

³² Supplement to Evidence Paper 3: Transport and Accessibility: Part 2a – Assessment of alternative development strategies Table 4-1 (CEPS/05a)

- 8.25 ***5. Has an acceptable landscape impact upon the countryside and the settings to Chippenham and surrounding settlements, improves biodiversity and access and enjoyment of the countryside***
- 8.26 All alternative strategies will have some landscape impact upon the countryside and the settings to Chippenham and surrounding settlements, although they do provide opportunities to improve biodiversity and access and enjoyment of the countryside. The Eastern Link Road Strategy includes Sites B1 and C4. Site B1 has a high visual prominence and the site is likely to be sensitive to encroachment from the town. It also contains Rawlings Farm which is a heritage asset. However potential mitigation exists in the form of lower density of development and prevention of intrusive large buildings on the site. Site C4 has several areas which have moderate to low development capacity. The reasons for the moderate to low development capacity is the fact that land north of the North Wiltshire Rivers Route is located on higher ground that is more visually prominent, is land that maintains separation between Chippenham and Tytherton Lucas and constitutes the relatively remote and tranquil area around the River Marden and land associated with the floodplain of the River Avon. Together these impacts are difficult to mitigate. The area of land in the vicinity of Harden's Mead is marginally less sensitive being located on lower ground next to the eastern edge of Chippenham, but does contain Hardens Farmhouse which is a heritage asset. Sites B1 and C4 both contain certain features of ecological value including the River Avon County Wildlife Site where there is potential for mitigation.
- 8.27 The Southern Link Road Strategy contains certain features of ecological value such as Mortimores Wood County Wildlife Site and the River Avon County Wildlife Site as well as Rowden Manor and Rowden Conservation Area. There is potential for mitigation in relation to each aspect which means there are areas within site options in strategic areas E and D that will have moderate but also low development capacity.
- 8.28 The Submitted Strategy contains site options E2, B1 and C1. The majority of development in C1 is proposed south of the North Wiltshire Rivers Route in the vicinity of Harden's Mead which is considered to be marginally less sensitive for development being located on lower ground next to the eastern edge of Chippenham, although it does contain Harden Farmhouse which is a heritage asset. Site B1 has a high visual prominence and the site is likely to be sensitive to encroachment from the town. It also contains Rawlings Farmhouse which is a heritage asset. However potential mitigation exists in the form of lower density of development and prevention of intrusive large buildings on the site. Site E5 contains certain features of ecological value including the River Avon County Wildlife Site as well as the Rowden Conservation Area where there is potential for mitigation.
- 8.29 The Mixed Strategy contains site options E5 and B1. Site B1 has a high visual prominence and the site is likely to be sensitive to encroachment from the town. It also contains Rawlings Farm which is heritage asset. However potential mitigation exists in the form of lower density of development and prevention of intrusive large buildings on the site. Site E5 contains certain features of ecological value including

the River Avon County Wildlife Site as well as Rowden Manor and Rowden Conservation Area where there is potential for mitigation.

- 8.30 All the strategies involve possibilities threatening poor impacts on the quality of the landscape, heritage and biodiversity assets.
- 8.31 **6. Avoids all areas of flood risk (therefore within zone 1) and surface water management reduces the risk of flooding elsewhere**
- 8.32 All land proposed for development is within zone 1. All strategies would include sustainable drainage measures to at least replicate greenfield rates of surface water discharge. None of the strategies would therefore increase peak flows on the River Avon and increase the risk of flooding elsewhere. All strategies contain some land classified as floodplain (zones 2 and 3) associated with the River Avon. This provides a suitable location for increasing opportunities for open space and public access provision along the river corridor. The undulating landform is an attractive feature and could enable the capture of a variety of views from housing and the street and pedestrian network along the river valley.
- 8.33 By development taking place outside flood zones and through the use of sustainable drainage measures, each of the alternative strategies is considered capable of avoiding an increase in flood risk and providing opportunities to better manage surface water.

Selecting a Preferred Strategy

- 8.34 The selection of a preferred alternative development strategy is informed by both the conclusions of the sustainability appraisal (SA) and the policy assessment. As stated above the SA concludes that the mixed strategy is preferred. The SA conclusions are reflected in the discussion below.
- 8.35 The comparison of the alternatives based on the policy assessment set out above can be summarised as follows. With criteria 1, that relates to economic growth and resilience highlighted in green, each alternative strategy has the six criteria reported by whether they represent a strength, opportunity, threat or weakness.

Step 8 SWOT Assessment (Performance against CP10 criteria 1-6)				
	Strength	Opportunity	Threat	Weakness
Eastern Link Road		③ ④ ⑥	② ⑤	①
Southern Link Road	②	④ ⑥	③ ⑤	①
Submitted	① ②	③ ④ ⑥	⑤	
Mixed	① ②	③ ④ ⑥	⑤	

Core Policy 10 Criteria/CSAP objective

- ① Delivering economic growth
- ② Providing housing supported by appropriate infrastructure
- ③ Improving connectivity and reducing traffic impacts
- ④ Improving access to sustainable transport
- ⑤ Minimising landscape impact and protecting the natural, historic and built environment
- ⑥ Managing flood risk

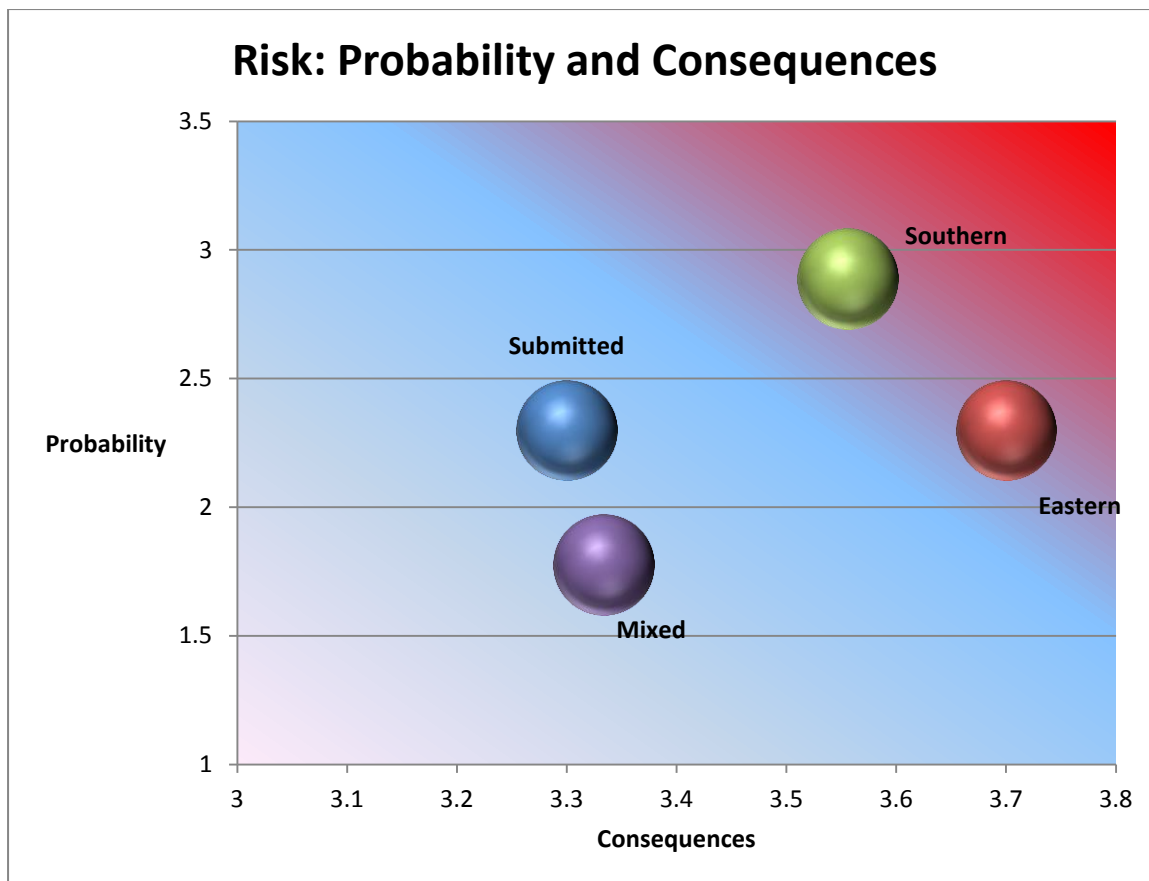
8.36 The submitted strategy along with the mixed strategy has economic growth and greater resilience as a strength (criterion 1). Prospects for economic growth are seen as a weakness of both Eastern and Southern Link Road strategies.

8.37 Mixed and submitted strategies also stand apart from these latter two by having fewer weakness and threats overall. On this basis a choice of preferred strategy appears to be between Mixed and Submitted Strategies. Sustainability appraisal prefers the Mixed Strategy.³³ It states:

8.38 *“Taking into account performance across the environmental and socio-economic objectives in order to find the preferred strategy together with the fulfilment of the minimum residual housing and employment requirements, it is considered that the Mixed Strategy is the alternative with the best sustainability performance and it is recommended as the preferred alternative. However, this would require satisfactory solution of the heritage and landscape adverse effects identified prior to taking this alternative forward.”*

8.39 To inform the selection of a preferred development strategy a risk assessment was also carried out to understand the different risks posed by each alternative development strategy being considered. The conclusion of the exercise is illustrated in Chart 1, below. The detailed assessment is found at **APPENDIX 7**. The specific risks in relation to each strategy are discussed further below in the context of each alternative development strategy.

³³ CSUS/11 Addendum 2 of the Draft Revised Sustainability Appraisal Report.



8.40 In addition an independent viability assessment has assessed the ability of each of the site options within each alternative development strategy to judge whether they are capable of development whilst funding infrastructure requirements and levels of affordable housing sought by the Wiltshire Core Strategy³⁴. Again the conclusions are reflected in the discussion below.

Southern link road strategy

8.41 Sustainability appraisal considers the socio-economic benefits of the Southern Link Road strategy equivalent to the mixed strategy with additional major benefits in terms of housing and the provision of infrastructure that would support economic growth. The moderate adverse effects of dissecting the River Avon CWS are however considered problematic to mitigate.

8.42 Viability assessment shows each of the strategic site options within the southern link road strategy to be viable at target levels of affordable housing provision. Risk assessment, however, shows this strategy to involve the most risk of the alternatives.

8.43 By comparison to the stronger two strategies the SWOT analysis indicates that a Southern Link Road strategy is weak in terms of economic growth because of

³⁴ Chippenham Strategic Site Viability Assessment, BNP Paribas (April 2016)

uncertainty about the scale and timing by which employment land can be provided. Whilst the bulk of the land required during the plan period can be provided at site option E5 (18ha), land east of the river (D7) is currently not being promoted other than through the SHLAA. It is therefore more difficult to rely on site option D7 to deliver land for business development to the scale required or at the speed it is needed. Traffic evidence³⁵ shows that a southern link road (SLR) does not provide equivalent benefits to an eastern alternative. Most crucially an SLR will lead to a conflict of heavy traffic flows at the southern end of the A350 Chippenham bypass³⁶. The connection to the M4 corridor provided by the A350 is one of the town's main attractions for business investment and interrupting its functioning would therefore directly undermine an employment led strategy for the town. **This strategy is therefore rejected.**

Eastern Link Road strategy

- 8.44 Sustainability appraisal concludes that the Eastern Link Road (ELR) Strategy would deliver the least socio-economic benefits due to the quantum of employment land being proposed. Its full potential has not been fulfilled through the proposed strategy. Although this shortfall could be addressed if this Strategy was to be taken forward, the ELR Strategy provides a choice of employment locations but relies on the provision of the ELR to bring land forward with strong access to the Primary Road Network. The moderate adverse effects of dissecting the River Avon CWS are however considered problematic to mitigate.
- 8.45 Viability assessment shows each of the strategic site options within the Eastern Link Road strategy are viable at target levels of affordable housing provision. Risk assessment shows the strategy has risks akin to the Submitted Strategy but involving potentially more serious consequences because of the total reliance on a completed Eastern Link Road to deliver accessible employment land and deliver the quantum of homes required.
- 8.46 The SWOT analysis indicates that an Eastern Link Road (ELR) strategy is highly unlikely to meet local needs for employment land. Land supply for business growth is only likely to substantially materialise toward the end of the plan period when it is needed now due. This is due to the dependence for its delivery on the ELR. Traffic evidence shows benefits to the ELR that are both substantial and long term that would support economic growth. For the great majority of the plan period, however, potential for economic growth would be served by a limited scale of development at site option B1 and the possibility of some land served by the A4 within site option C4. Scope for greater provision in site option C4 would only be likely to attract significant interest once an ELR completes a link to the A350 late in the plan period. At present, developers promoting this option also seem to recognise limited potential for employment uses on the site. Land at site option B1 provides for a particular range of employment- generating uses. For environmental reasons

³⁵ Supplementary Evidence to Transport and Accessibility Evidence : Part 2a Assessment of Alternative development Strategies (CEPS/05a)

³⁶ Supplementary Evidence to Transport and Accessibility Evidence : Part 2a Assessment of Alternative development Strategies (CEPS/05a)

identified in sustainability appraisal, large commercial buildings are unacceptable³⁷. The supply of land for economic development under this strategy is therefore limited in scale, timescales are protracted and scope to meet in full the range of investment needs is limited. As a strategy it therefore fails to provide an employment-led solution to the town's future. **This strategy is therefore rejected**

- 8.47 National Planning Policy Framework requires that employment land is provided in the right places at the right times and neither Eastern nor Southern Link Strategies meet this requirement³⁸.
- 8.48 In contrast, the SWOT assessment of the alternative strategies not only shows that the Submitted and Mixed alternative development strategies perform better than the others, it also reports them as very similar in terms of the Core Policy 10 criteria. A more detailed consideration of these two options is therefore needed.

Mixed versus Submitted Strategies

- 8.49 As recognised by sustainability appraisal the submitted strategy provides the most social and economic benefits of the two strategies mainly as it proposes a greater scale of development. The sustainability appraisal however recommends:
- 8.50 *'Taking into account performance across the environmental and socio-economic objectives in order to find the preferred strategy together with the fulfilment of the minimum residual housing and employment requirements (1780 dwellings and 21.5ha of employment land) which is understood as representing development need, it is considered that the Mixed Strategy is the alternative with the best sustainability performance and it is recommended as the preferred alternative³⁹'.*
- 8.51 Overall, the differences between the two strategies, as far as environmental effects, appear as relatively marginal and most potentially adverse effects from either strategy are seen as capable of mitigation. It is therefore important to consider which of these two alternative development strategies on balance, and informed by SA, best delivers development that implements the Core Policy 10 criteria and the objectives of the CSAP.
- 8.52 There is a fundamental choice between the two strategies that can be characterised by asking whether it is justified to take some decisions now that will affect the next plan period in order to create greater settlement resilience and secure social and economic benefits as a result of the development (the Submitted Strategy); or whether decisions made now should be about delivering the homes and jobs needed now without prejudicing the longer term development needs at Chippenham (the Mixed Strategy).

Employment land supply

³⁷ CSUS/11 Draft Revised Sustainability Appraisal Report

³⁸ National Planning Policy Framework (NPPF), paragraph 7, DCLG, (March 2012)

³⁹ CSUS/11 Draft Revised Sustainability Appraisal Report

- 8.53 The need to address economic needs and to support growth would suggest the former. In recent years local economic growth has been stymied by a lack of greenfield sites. This has caused uncertainty over new investment and for existing jobs. As well as holding back prospects for the future, local businesses have lacked the space in Chippenham to consider expansion and, in some cases, have looked to move away⁴⁰.
- 8.54 Land for employment development at South West Chippenham features in both the mixed and submitted strategies. It represents the first major land release for business development for a number of years but it is also vitally important to the town's future growth that recent circumstance of no land available to business does not repeat itself. This is all too possible if the strategy simply plans for requirements over the relatively few years remaining to 2026, the end of the current local plan period.
- 8.55 More precisely, the proposition is whether or not to identify now a second business park location. The need is for serviced land that can be made available for a variety of users grouped together economically. This need is highly unlikely to change over the next ten years or more and is highly unlikely to be provided on an independent speculative basis. Available land in this form and scale cannot be delivered by other means in the Chippenham area other than in conjunction with residential development and other uses as part of a strategic site⁴¹. The Swindon and Wiltshire Economic Plan highlights the locational factor of proximity to the A350 and M4 corridor as a main determinant of attractiveness to investment⁴².
- 8.56 A second business park is provided in the Submitted Strategy within site option C1 that meets each of these criteria. There is more than a reasonable prospect of development taking place but only once an Eastern Link Road creates a direct connection to the A350. The assessment of site options evidences a lack of suitable alternatives. The Submitted Strategy provides for an important continuity of land supply beyond 2026 and there is a good case for safeguarding a greater amount of land for employment development than proposed in the Wiltshire Core Strategy.
- 8.57 Both strategies include site option B1 which includes employment land that capitalises on the site's relative proximity to the town centre to provide opportunities for employment generating uses that could benefit from this location.

Impact on town centre viability and vitality

- 8.58 The Submitted Strategy results in an ELR linking the A4 to the A350. This is a key difference between the two strategies. The evidence shows that without this, traffic flow in the central area under the mixed strategy increases by 1%. With an ELR and other junction improvements traffic flows within Chippenham town centre would

⁴⁰ Examples include Herman Miller who moved their factory on the A4 to Melksham and DTRBMS who have moved from Bumpers Farm in Chippenham to Trowbridge both because of a lack of available land in Chippenham in the last few years.

⁴¹ Briefing Note 5: Role of Strategic Sites (CEPS/16)

⁴² Swindon and Wiltshire Economic Plan (CECON/01)

reduce by approximately 13%.⁴³ Relieving congestion within the town centre supports a key economic objective of the strategy by making investment in the town more attractive, supporting central area regeneration and the vitality and viability of the town centre as whole.

- 8.59 The mixed strategy does not include a completed ELR but does include the delivery of the Cocklebury Link Road which will provide some traffic relief particularly by providing an alternative egress from the Cocklebury Road/Station Hill area. The evidence indicates that with this and other junction improvements traffic flows within Chippenham central area would reduce by approximately 6%.¹¹

Environmental Impacts

- 8.60 Achieving a secure land supply for economic growth alongside road infrastructure that directly supports economic regeneration are, together, highly persuasive factors in favour of following a longer term Submitted Strategy. Sustainability appraisal however highlights the significant adverse effects likely to arise from dissecting the River Avon CWS as a part of proposals⁴⁴. NPPF asks Councils to minimise impacts on biodiversity⁴⁵. Sustainability appraisal concludes that these impacts will be problematic to mitigate.
- 8.61 Whilst overall, sustainability appraisal considers the likely significant effects of both strategies will have effects capable of mitigation, site option C1 is identified as having particular adverse effects that are also problematic to mitigate. In particular, assessments highlight impacts on the attractiveness of the Marden Valley north of the North Wiltshire Rivers Way and possible harm to the character of the Tytherton Lucas Conservation area. Even were housing and employment development removed from these more sensitive areas, the strategy still involves the intrusion of a new road and the traffic that brings.
- 8.62 These environmental consequences of a Submitted Strategy need to be balanced against the economic benefits of the Submitted Strategy compared to the Mixed strategy. Especially as the scale of these environmental consequences are directly related to the scale of development proposed compared to the housing and employment land requirements for Chippenham set out in the Wiltshire Core Strategy.

Housing delivery

- 8.63 The submitted strategy proposes to allocate land that can accommodate approximately 2,500 homes. The mixed strategy proposes 2,050. Both can be compared to an indicative requirement for 'at least 1,780 dwellings' over the remainder of the plan period.

⁴³ Supplement to Transport and Accessibility Evidence Paper: Part 2a: Assessment of Alternative Development Strategies Table 4-1, page 23

⁴⁴ Add reference to statement in the SA – awaiting published version

⁴⁵ National Planning Policy Framework (NPPF), paragraph 117, DCLG, (March 2012)

- 8.64 The National Planning Policy Framework (NPPF) asks that Councils demonstrate there is five years' supply of deliverable land for house building⁴⁶. A large bank of land helps to ensure there is scope and flexibility to bring forward supply over the plan period. Being in the second half of the current local plan period, it is also justified to plan for larger scale over a longer time period in order to ensure a continuity of supply. To differing degrees both strategies provide this.
- 8.65 The NPPF looks for plans to boost significantly the supply of housing⁴⁷. More than half way through the plan period, rates of house building in Chippenham have met less than a quarter of the local requirement⁴⁸. This has undoubtedly compounded problems supplying affordable homes. Boosting the supply of land for house building in Chippenham will be a major step toward meeting targets for the provision of affordable housing that, locally, are not yet near being achieved.
- 8.66 The Submitted Strategy has a larger scale of housing development than the Mixed Strategy and provides an additional choice of locations for the house buyer. This will also provide for a greater number of house builders and so improve the range and choice of house types on offer. A larger number of house builders and an additional location should allow the Submitted Strategy to achieve higher rates of development, sooner and make it more likely to deliver the scale of growth required by the Wiltshire Core Strategy. A larger number of affordable homes can then be built as a part of higher rates of development. This result will support objectives of the Plan and Core Strategy to meet targets for affordable housing provision. A larger rate and scale of development, as provided by the Submitted Strategy can therefore provide for a wider choice of homes and help Chippenham to become a more attractive place to live for a greater range of people. A Submitted Strategy can therefore be argued as performing better than the Mixed Strategy in terms of promoting a more resilient local economy.
- 8.67 On the other hand, it can also be claimed that a Mixed Strategy provides a generous supply of land for housing development. It is more closely allied to levels of growth indicated in the Wiltshire Core Strategy and is therefore more in step with the scales of population growth on which infrastructure providers have until now been planning for services and facilities.
- 8.68 It can also be argued that a Mixed Strategy is also closely aligned to the levels of housing development that a Submitted Strategy will actually provide in the Plan period. There appear to be no significant complications to the delivery of the different land parcels in South West Chippenham in terms of infrastructure provision. The particular complexities around the delivery of strategic site options in C1 may well lead to significant construction commencing only in several years time. As a result levels of housing completions for Mixed and Submitted Strategies could be broadly similar in the Plan period. The additional benefit of strategic site option C1 is possibly more accurately described as offering a choice of locations and, by these means, the possibility of achieving higher rates of house building, but only late in the plan period. This benefit then has to be balanced against the range of

⁴⁶ National Planning Policy Framework (NPPF), paragraph 47, DCLG, (March 2012)

⁴⁷ National Planning Policy Framework (NPPF), paragraph 7, DCLG, (March 2012)

⁴⁸ Housing Land Supply Statement, Wiltshire Council, (April 2015), Appendix 6 (CHSG/08)

house builders that might also operate to deliver site option E5 and the possibility of some, if not all, commencing as soon or sooner than strategic site option C1.

- 8.69 Additionally, strategic site option C1 is assessed as falling slightly short in its capacity to deliver policy compliant levels of affordable housing and its viability can be viewed as marginal. Given the central position of this strategic site option to the delivery of the ELR and Submitted Strategy this is a significant finding.
- 8.70 The development of brownfield land is a priority over greenfield. The Wiltshire Core Strategy notes there are limited opportunities for brownfield development within the existing urban area⁴⁹. However, by its nature, such windfall development is difficult to predict. Whilst land requirements take account of current brownfield land opportunities for redevelopment and there is no 'windfall allowance', there must always be the possibility that more land becomes available. This conclusion makes the Submitted Strategy more vulnerable than the Mixed Strategy to the possibility that it will lead to the premature loss of countryside by allocating site option C1. This could be a particularly serious flaw to a strategy that involves the significant step of developing a large amount into open countryside east of the River Avon. There are therefore important qualifications to the arguments for a scale of housing allocation that is a main part of the Submitted Strategy. These might suggest the Mixed Strategy is a more realistic and sensible course.

Risk Assessment

- 8.71 Risk assessment (see Chart 1 and APPENDIX 7) shows that the Mixed Strategy involves less probability of delivery being jeopardised than the Submitted Strategy. A Mixed Strategy, however, has a slightly more severe set of consequences should risks affect it. This is due to the risk of it failing to meet targets for affordable housing provision arising from the strategy's reliance on two sites, as opposed to the Submitted Strategy which proposes three, but mainly from having a lower overall scale of development. The deliverability of strategic site option C1 (see above) also needs to be drawn into the balance, however, possibly negating the advantage of the Submitted Strategy on this aspect.
- 8.72 Viability assessment shows strategic site option E5, E2 and B1 to be viable at target levels of affordable housing provision
- 8.73 Risks around the delivery of the Submitted Strategy revolve around development lacking co-ordination and failing to achieve agreement amongst land owners and developers. This affects the Submitted Strategy because of the number of interests involved in three sites and their interdependence'; in particular of two sites in the east.
- 8.74 Site option B1 occurs in both strategies and is an example. Development involves third party land and their owners' agreement to provide both vehicular accesses to the site. Roads provided by the development however are also essential to the development of site options east of the river in strategic area C and specifically strategic site option C1 of the Submitted Strategy. Even if no land is allocated in strategic area C in the current plan period, as in the Mixed Strategy, there will be speculation that it may be developed at some point in the future. There is therefore

⁴⁹ Wiltshire Core Strategy, paragraph 5.46, Wiltshire Council, (Jan 2015)

an added level of complexity to determining land values, ransoms and the master planning of site option B1, whatever strategy is preferred.

- 8.75 Successful development of site option B1, in either strategy, would ideally be based on a clear decision for or against some future development in strategic area C. But to decide firmly against development would close down options prejudging how future needs are met: to leave the situation undecided creates uncertainty. On the other hand accepting it is the appropriate next step for the town's growth, as evidence suggests, provides certainty and scope for co-ordinating delivery. Despite the greater risks of delay involved with the Submitted Strategy choosing a Mixed Strategy does not go very far in avoiding them. The 'Statement on Highway Network Resilience at Chippenham' has considered the complexity of interests in relation to either a southern or eastern link road and has recommended that should either become a proposal of the Plan a 'Delivery Group' should be established to reduce the risks of a delay to the delivery of development.
- 8.76 Evidence from a viability assessment⁵⁰ of each site suggests that site option C1 may narrowly fall short of being capable of meeting a policy compliant level of affordable housing. Evidence now shows that the owners of East Chippenham consider a larger amount of development is necessary to ensure that the site is clearly viable⁵¹. As well as the need to coordinate the delivery of infrastructure and negotiate land values with several different land interests, this still makes the Submitted Strategy a riskier proposition compared to the Mixed Strategy; potentially a level of risk that would undermine the effectiveness of the Plan should it follow this course.
- 8.77 A vehicle to lead and build a common approach to the development of site options B1 and C1 would go a considerable way to reducing such risks but its effectiveness depends on support and cooperation from the parties involved. Respective land owners have each submitted applications independent of each other. Together, whilst the application for site option B1 indicates land will be reserved within the site for the construction of the ELR and road bridge across the River Avon, neither current applications show a design for the bridge, concerted mitigation to avoid harm to the River Avon CWS, an integrated approach to strategic landscaping or manage surface water. To minimise the risk of not compromising the long term growth for the town land may be safeguarded within site options B1 and E5 in the Mixed Strategy so as not to preclude future provision for a possible ELR or SLR. Whilst this could complicate land negotiations it cannot be considered that it is an insurmountable barrier to the development of site options B1 and E5.

Conclusion

- 8.78 A slightly longer term view is justified and a large scale of land allocation appropriate because the Plan is being developed toward the latter end of its plan period. Both strategies select large sites that may inevitably involve development

⁵⁰ Chippenham Strategic Site Viability Assessment, BNP Paribas (April 2016)

⁵¹ Evidence statement on behalf of Chippenham 2020 LLP (M1/2a), paragraph 3.3, CSJ Planning (Oct 2015)

taking place beyond the Plan period. Consideration of two or more large mixed use sites will also have a range of impacts on the remainder of the town. It is sensible to look longer term at how they can best act in combination to mitigate harm and deliver the infrastructure necessary to do so. This cannot be contemplated so easily planning to a relatively short time horizon. Both Mixed and Submitted strategies therefore look beyond the plan period.

- 8.79 The master planning and development of large mixed use sites are capable of adapting to changing needs in the course of their development. There also appears little in either strategy to profoundly prejudice a capacity to meet future needs should they change.
- 8.80 The SWOT assessment concluded that Mixed and Submitted Plan strategies were broadly similar in their strengths, weaknesses, threats and opportunities. A closer analysis summarises the key differences between the two.

Step 8 Submitted compared to Mixed Strategies Key differences against CP10 criteria 1-6)				
	Strength	Opportunity	Threat	Weakness
Submitted	<p>① Provides continuity of employment land supply</p> <p>Safeguards the regeneration of the central area and the vitality of the town centre by new roads that can help prevent the adverse effects of added congestion arising from the scale of growth envisaged in the Wiltshire Core Strategy</p> <p>② Provides for a scale of development that might possibly better help to deliver housing requirements in the Wiltshire Core Strategy</p>	<p>③ Delivers wider network benefits that mitigates the adverse impacts on the local road network arising from the town's growth</p> <p>Provides for longer term network resilience</p> <p>④ Capitalises on opportunities to improve sustainable access to facilities and services such as Abbeyfield School and via an enhanced river corridor improves connectivity to the wider countryside</p>	<p>⑤ Potential for harm to sensitive areas of landscape, biodiversity and significance of heritage assets east of River Avon</p>	
	① ②	③ ④ ⑥	⑤	
Mixed	① ②	③ ④ ⑥	⑤	

8.81 The main difference between Mixed and Submitted Strategies is the allocation of site option C1 for development. The central question is therefore whether the advantages of allocating land east of Chippenham that are summarised above outweigh the likely harm.

8.82 **①** Safeguarding land for employment in this area is a benefit, but not allocating site option C1 does not prevent firm proposals for economic development being

formulated at a later date; likewise provision for an Eastern Link Road. Such proposals could be made with a clearer understanding of costs and scheme viability and greater certainty over the levels of affordable housing that a site can contribute.

- 8.83 **2** At this stage, based on the evidence, it is difficult to conclude that proposals for site option C1 can easily be implemented such as they make a significant contribution to local needs in the Plan period. Viability assessment casts doubt on the ability of the site to easily meet a policy compliant level of affordable housing. Likewise, the amount of new housing it might contribute within the plan period cannot be relied upon to be significant when considerable further work seems to be necessary to ensure the comprehensive development of the site. Allocating site option C1 is not essential to the provision of a deliverable supply of land for housing development over the plan period. It is only likely to make a significant difference to building rates and choice of housing toward the end the plan period. The economic benefits in terms of housing are therefore not profound.
- 8.84 **1** and **3** Not allocating site option C1 would give no certain basis for an Eastern Link Road, which the evidence shows to be a significant benefit in highway terms. Nevertheless a Mixed Strategy can preserve the possibility of providing such a link. Uncertainty over accessibility and attractiveness of the town centre may suppress investment in the town, but this factor has to be set alongside the far more obvious stimulus of the growth in catchment spending that would result from planned levels of development. The impact of a 1% increase in town centre traffic forecast to arise from a Mixed Strategy is not an unacceptable impact. In this respect, at worst, a Mixed Strategy can be seen as simply delaying possible future benefits or first positive steps toward them..
- 8.85 **5** Significant effects from the Submitted Strategy have been assessed by sustainability appraisal as well as SWOT assessment and overall shows only marginal overall differences between mixed and submitted strategies. SA identifies that both strategies involve a number of likely heritage and landscape adverse effects that would need to be addressed for either one to be taken forward. This should however not mask the likely adverse effects that would be problematic to mitigate arising from the landscape impact of development east of the River Avon, especially into the Marden Valley, and from dissecting the River Avon County Wildlife Site. In addition, there are issues to resolve to retain the significance of heritage assets within and beyond site option C1.
- 8.86 Risk assessment marks the Submitted Strategy as quite clearly carrying a greater amount of risk than the Mixed Strategy. To a degree this is inevitable for a larger and more ambitious form and scale of development, but there are important elements to the submitted strategy that require cooperation and collaboration between land owners and developers and from the stage reached already in the plan period, it is difficult to envisage these being satisfactorily resolved soon to provide a good level of confidence. In short, it is not possible to conclude safely that a Plan based on the submitted strategy can be delivered and the Plan effective and sound.

Sustainability appraisal concludes that:

8.87 *‘Taking into account performance across the environmental and socio-economic objectives in order to find the preferred strategy together with the fulfilment of the minimum residual housing and employment requirements, it is considered that the Mixed Strategy is the alternative with the best sustainability performance and it is recommended as the preferred alternative. However, this would require satisfactory solution of the heritage and landscape adverse effects identified prior to taking this alternative forward’;*

8.88 The Submitted Strategy therefore does not provide the net benefits in terms of economic development sufficient to justify departing from the recommendation of a Mixed Strategy provided as a conclusion of sustainability appraisal. **The Submitted Strategy is therefore rejected.**

A mixed strategy provides:

- Sufficient land for employment development to meet strategic requirements that is well located and readily available. This is the central feature to an employment-led strategy.
 - A sustainable supply of deliverable land for housing development up to the plan period that can make a substantial contribution to meeting needs for affordable housing, improving the attractiveness of Chippenham as a place to live and supporting its resilience
 - A CLR that mitigates the adverse impacts on the local road network arising from the town’s growth whilst maintaining the important economic role of the A350 corridor
- 8.89 Risk assessment shows the strategy carrying the least risk and viability assessment that site options can deliver appropriate levels of affordable housing alongside the infrastructure necessary to support them.

Part 2: Developing the Preferred Strategy

8.90 The above SWOT assessment, following sustainability appraisal of four alternative development strategies, has identified the 'Mixed' strategy as the most appropriate. This section takes forward that selection toward a preferred strategy as follows:

8.91 **Context and requirements** summarising how the Preferred Strategy needs to take account of:

- site constraints
- risks to delivery
- plan objectives
- the vision for Chippenham; and
- national planning policy

8.92 **Content:** the rationale for the content of the Preferred Strategy including how proposals are justified, meet Plan objectives and are consistent with the National Planning Policy Framework;

- meeting plan objectives;
- addressing site constraints; and
- delivery

Context and requirements

Site Constraints

8.93 Assessments of strategic areas and site options have identified a number of constraints and potential obstacles to their development. These considerations require mitigation to ensure that development is acceptable and sites deliverable. They may also lead to some amendment to the proposals for each site that have been contemplated so far. Some of the most important identified by sustainability appraisal⁵² are:

Site Option B1: Rawlings Green	
Landscape	The visual impact of development due to the prominence of the site in the wider landscape needs to be minimised. In particular, measures need to retain the sense of remoteness and separation of Langley Burrell from the expansion of Chippenham.
Traffic	Pressures on already congested routes before the completion of a Cocklebury Link Road should be minimised in order to alleviate impacts on the road network and address potential air quality issues.
Heritage	The significance of Rawlings Farm, a grade 2 listed building, should not be harmed. The importance should not be reduced of the settings to the

⁵² CSUS/11 Draft Revised Sustainability Appraisal Report

	significance of Langley Burrell and Tytherton Lucas Conservation Areas.
Surface water	Surface water management measures should ensure existing greenfield rates of surface water run-off are achieved to reduce the risk of groundwater flooding onsite and minimise increases to peak flows on the River Avon downstream, particularly Chippenham Town Centre.

Site Option E5: South West Chippenham	
Heritage	<p>The significance of Rowden Manor and associated buildings, a grade 2 star listed building, should not be harmed.</p> <p>The importance should not be reduced of the setting to the significance of Rowden Manor Conservation Area.</p>
Surface Water	Surface water management measures should ensure existing greenfield rates of surface water run-off are achieved to reduce the risk of groundwater flooding onsite and minimise increases to peak flows on the River Avon downstream, particularly Chippenham Town Centre.

8.94 The sustainability appraisal identifies a number of other factors that it suggests need to be mitigated to prevent relatively minor adverse effects. Some of these are common to more than one site; for example, the need to protect the value of the River Avon Valley County Wildlife site. The sustainability appraisal also identifies site specific measures that will need to be incorporated within a set of development proposals. These elements would be considered as part of developing master plans for each site and would be subject to further more detailed site surveys and assessments as part of the design process leading to the submission of a planning application.

8.95 Proposals of the Plan will require 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. Policies of the Plan can include requirements to satisfactorily resolve key constraints like those in the tables above, that ultimately are central to whether planning permission should or should not be granted.

Risks to delivery

8.96 A risk assessment accompanied each of the alternative strategies formulated at step 6. (Attached at **APPENDIX 7**) It identified a number of risks to the delivery of the Mixed Strategy. The most significant risks can be considered under three headings:

Landscape and visual impacts

- 8.97 A significant expansion of Chippenham breaches clear visual and physical boundaries to the town at site option B1 (Rawlings Green). For the purposes of plan making, the evidence suggests that the site is capable of acceptable development so long as these adverse effects are mitigated. The risk is that further detailed work on this site involves reductions in the developable area to the degree that plan objectives cannot be realised.
- 8.98 Proposals of the Plan will need to be framed to address these risks directly and build in contingencies that allow for comprehensive mitigation.

Road infrastructure

- 8.99 The development of Rawlings Green requires two vehicle access points in order to safely, in traffic terms, deliver the total scale of development expected of the site. Each access requires the co-operation of third party land owners to achieve their construction. Land owners have indicated they are willing to collaborate on all of them. Viability assessment indicates the site is capable of funding necessary infrastructure, including new roads, and meet policy compliant levels of affordable housing.
- 8.100 The risks are that the objectives of the Plan will not be reached because road infrastructure is not provided at the right time or cannot be afforded (see below) to achieve one or more of the connections needed to deliver the strategy. The Plan needs to recognise these obstacles and whether delays may materialise in case contingencies are needed.

Viability

- 8.101 Viability assessment⁵³ of each site has shown that, for the purposes of plan making, each of the sites is capable of delivering target proportions of affordable housing. Each site, however, as might be expected for the scale of schemes proposed, involves significant infrastructure costs. Viability assessment has included quite pessimistic scenarios and concluded development viable with policy compliant levels of affordable housing. More detailed work may nevertheless reveal costs exceed current estimates. It may also reveal costs are less.
- 8.102 However, the main risks are likely to involve the expectations of third party landowners at Rawlings Green, how much they see their land as ransom, alongside the costs of providing infrastructure at the times required. It is understood that agreement has been reached between Network Rail and the land owner of Rawlings Green. Remaining risks largely involve the connection to Cocklebury Road and the delivery of access to the A350 via development at North Chippenham.
- 8.103 The possible consequence of risk to the viability of a site are unlikely to remove altogether the incentive for land owners and developers to develop, but could result in both pressures to reduce levels of affordable housing and delay.

Meeting Plan objectives

⁵³ Chippenham Strategic Site Viability Assessment, BNP Paribas, (April 2016)

- 8.104 Both of the sites individually, and together as the mixed strategy, have been assessed according to their strengths, weaknesses, opportunities and threats against the six criteria of Core Policy 10 of the Wiltshire Core Strategy. These criteria correspond to the Plan's objectives and themselves derive from the many issues affecting Chippenham's future identified through the preparation of the Core Strategy⁵⁴.
- 8.105 Specific to Chippenham, Core Policy 10 applies alongside Core Policy 9 (Chippenham Central Areas of Opportunity) of the Core Strategy. This policy provides a comprehensive framework for the regeneration of the town's central area. Together the two policies reflect the town's status as a Principal Settlement where development needs are focussed for housing and for the provision of significant job growth, which will help to improve the self-containment of the town by providing more jobs for local people.
- 8.106 An 'employment-led strategy' for the town envisages job growth from opportunities identified within the central area and by new sites for business development forming a part of new strategic sites; site option E5 (South West Chippenham) and Rawlings Green. The Plan's preferred strategy is one part of the strategy set out in the Wiltshire Core Strategy for Chippenham. It must work in tandem by complementing proposals for the central area and the priority for brownfield sites that this takes forward. It must not work against this key aspect of the overall strategy for the town.

Vision for Chippenham

- 8.107 The Vision for Chippenham, prepared by a partnership of local authorities, organisations and groups provides 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 a detailed strategy. Amongst other elements it proposes that:
- 8.108 *"The River Avon as the town's 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.*
- 8.109 *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.*
- 8.110 *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.*
- 8.111 *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 transport⁵⁵"*

⁵⁴ Wiltshire Core Strategy, paragraph 5.48, Wiltshire Council, (Jan 2015)

⁵⁵ Chippenham Visioning: ATLAS Report on the visioning event held on 23rd September 2010

- 8.112 Development proposals of the preferred strategy are capable of delivering important elements of the vision, as a necessary part of their development. A detailed strategy needs to ensure these aspects are progressed for the wider benefit of the community. Proposals should therefore deliver employment land that can strengthen the town's offer, sites incorporating large extents of the River Avon Valley should ensure this connecting feature is realised as a thriving artery giving the town a stronger identity. One of the main challenges of developing a strategy is for development not to add to congestion in and around the town centre when the scale of development proposed represents such a significant source of additional traffic growth.

National Planning Policy

- 8.113 The National Planning Policy Framework (NPPF) has at its heart a presumption in favour of sustainable development. The Council should positively seek opportunities to meet the development needs of their area and a detailed strategy must deliver the sustainable development of the area.
- 8.114 NPPF describes an economic role for the Plan as contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure.
- 8.115 A key part of business infrastructure is the efficiency of the local transport network. Chippenham in particular, as its vision encapsulates, has potential to improve its economic base on the advantages of its excellent links. One of the strengths of the Rawlings Green proposal is the proximity of new business and homes to the railway station. Road connections to the A350 and M4 are a main factor to achieving the plan's objectives for employment led growth.
- 8.116 In developing a preferred strategy, Chippenham finds itself without a ready supply of land for new businesses moving into the area or to accommodate those businesses of its own that are looking to expand. Without land available they might therefore look to relocate away from the area altogether. A key task for the preferred strategy is therefore to provide land for business development that is available as immediately as possible. NPPF asks for land to be identified at the right time and in the right places to secure economic growth.
- 8.117 Housing is a national priority; presented in the NPPF by the planning system being used to boost significantly the supply of housing. Rates of house building in Chippenham have declined dramatically since 2006, the beginning of the Wiltshire Core Strategy plan period, and there is a real prospect of the town failing to meet the needs of the area. A large factor in the decline of house building has been the lack of land available for development. The Wiltshire Core Strategy plan period, to 2026, is now half way through and less than a quarter of the minimum requirement has been built. There is therefore a compelling argument to provide a generous supply of land for housing development.

- 8.118 The Wiltshire Core Strategy sets a scale of housing development as ‘at least 4510’ dwellings over the plan period; a level constrained by what was considered an achievable, and possibly conservative estimate, for uplift over the remainder of the plan period. The mixed strategy allocates land that, if it were all built would exceed 4510 dwellings over the plan period.
- 8.119 The NPPF requires local authorities to ensure a supply of land for housing development that is deliverable. Deliverable land is defined as sites that should be available now, offer a suitable location for development, and be achievable with a realistic prospect that housing will be delivered on the site within five years and in particular that development of the site is viable. A detailed preferred strategy must plan for a scale of land release that can offer a continuity of supply to housebuilders. There are however a number of constraints and risks attached to the delivery of sites (see above) that may delay construction on all or parts of sites, preventing them from being deliverable as soon as might otherwise be desired. Other land may be less constrained and developed more quickly and more easily. A detailed preferred strategy, to be consistent with national policy, must manage the release of housing land to support a continuous deliverable supply of land within the housing market area (HMA) over the plan period. Chippenham as a Principal Settlement in the HMA has a key role to play.
- 8.120 A sufficient amount of land for housing development will not by itself ensure that rates of house building are restored to a level that meets needs. A choice of deliverable sites provides the best prospects for achieving the scale of development that is needed in the plan period. A choice of sites and a number of house builders will also provide competition and a better choice to the house buyer. A goal of national planning policy is to deliver a wide choice of high quality homes.
- 8.121 The Plan must set out the justification for the number of homes proposed. A detailed strategy must include a framework that manages the release of site allocations in a manner that reconciles conflicting considerations. Against the benefits of boosting significantly housing, ensuring continuity of supply and choice of land for house building, is the possibility of harm that might come from over provision for housing, such as growth running ahead of the capacity of local infrastructure to support population growth.

Content of a preferred strategy

- 8.122 Assessment of the mixed strategy has identified several areas where proposals can be amended in order to reduce harmful impacts of development. The areas can be considered under three topics.

Meeting Plan Objectives

An Employment-led strategy

- 8.123 The strategy for Chippenham is to provide for substantial job growth. Core Policy 9 provides a framework for the regeneration of the central area of the town and by so doing provides the basis for creating a large number of jobs in and around the town centre. The preferred strategy identifies two strategic sites to meet the employment needs of the town; one at South West Chippenham and another at Rawlings Green. Together these sites provide for 23ha of land for employment development to be delivered within the Plan period.
- 8.124 The Swindon Wiltshire Local Economic Partnership (LEP) identifies the A350 corridor as a main focus for growth⁵⁶; Chippenham particularly so because of its location in that corridor. LEP led investment has already carried out improvements to the A350 around the town, to benefit not just of the town but the corridor as a whole and its economic prospects. It is also working to develop a hub for mixed use development around the town's railway station, forming part of the central area's regeneration.
- 8.125 The Vision for Chippenham already envisages how the town may take advantage of its excellent rail and road links and its position on the high tech corridor between London, Bristol and beyond. In this vision, the town will strengthen its offer and role as a business location ensuring people can live and work locally.
- 8.126 Thus proposals of the Plan will complement a wider employment led strategy that supports a variety of businesses in a variety of locations in and around the town. Proposals for South West Chippenham and Rawlings Green, providing greenfield sites for new and relocating business development, are therefore wholly consistent with policy contained in the National Planning Policy Framework to provide the right sites in the right places at the right time. Maintaining the variety of strands in the supply of opportunities for economic growth is essential to achieving a greater resilience to economic cycles. The more sustainable growth that results provides a more certain environment for wider investment in the town and in the town centre for retail, leisure and other services that can help achieve a far greater degree of self-containment, allowing Chippenham to retain the spending power it builds.
- 8.127 In recent years local economic growth has been stymied by a lack of greenfield sites⁵⁷. This has caused uncertainty over new investment and for existing jobs. As well as holding back prospects for the future, local businesses have literally lacked the space in Chippenham to consider expansion and, in some cases, have looked

⁵⁶ 'Aligning Local Innovation With Government Ambition', Strategic Economic Plan, paragraph 4.35, Swindon and Wiltshire Local Enterprise Partnership (Mar 2014)

⁵⁷ Evidence Paper 1: Economy Interim Paper, Wiltshire Council, (Dec 2014)

to move away. Development of South West Chippenham provides the most immediate remedy to this situation possible. Its location adjacent to the A350, yet directly related to the urban area, provides the most attractive location that Chippenham can offer. It provides a substantial amount of land that can offer serviced land to a number of potential users.

Meeting needs for housing

- 8.128 The National Planning Policy Framework looks for plans to boost significantly the supply of housing⁵⁸. More than half way through the plan period, rates of house building in Chippenham have met less than a quarter of the local requirement. This has undoubtedly compounded problems supplying adequate amounts of affordable homes. Boosting the supply of land for house building in Chippenham will be a major step toward meeting targets for the provision of affordable housing that, locally, are not yet near being achieved.
- 8.129 The preferred strategy proposes to allocate land that can accommodate approximately 2,050 against an indicative requirement for 'at least' 1,780 dwellings over the remainder of the plan period. This is justified, as set out below.
- 8.130 NPPF asks that Councils demonstrate there is five years' supply of deliverable land for house building. A larger bank of land helps to ensure there is scope and flexibility to bring forward supply over the plan period.
- 8.131 The Wiltshire Core Strategy, to avoid unrealistic development requirements, recognised the uncertainty around what can be done in the remainder of the plan period to substantially increase rates of housing building by phrasing its indicative requirements as 'at least' 4,510 dwellings. It can be argued that the floor level is, by implication, below what might be considered local need.
- 8.132 Being in the second half of the current local plan period, it is also justified to plan for larger scale over a longer time period in order to ensure a continuity of supply. The Core Strategy identifies strategic sites on greenfield land as the means to provide a predominant proportion of the town's new housing. Inevitably this tends to involve large sites, over a long period of time that may then be developed beyond the plan period.
- 8.133 South West Chippenham and Rawlings Green represent the most appropriate locations for development compared to some others. The two areas amount to a large amount of allocated land but are necessary to complement and work in tandem to sustain the step change in housing provision being sought at a national and local level.
- 8.134 A large scale of housing development provides an additional choice of locations for the house buyer. It will also provide for a greater number of house builders to improve the range and choice of house types on offer.
- 8.135 A larger number of house builders will allow the town to achieve higher rates of development, sooner, equivalent to historic levels, than if there were just two or less locations. This may well relieve the cumulative pressures from house builders for

⁵⁸ National Planning Policy Framework (NPPF), paragraph 47, DCLG, (Mar 2012)

development at settlements that are not suited to such growth, preventing the harm that might otherwise result.

- 8.136 A larger number of affordable homes can be built as a part of higher rates of development. This result will support objectives of the Plan and Core Strategy to meet targets for affordable housing provision.

Addressing site constraints

Landscape and visual impacts

- 8.137 Rawlings Green is prominent in the wider landscape. The evidence recommends a number of measures that would mitigate possible harmful visual effects from urban development on the attractiveness of the rural landscape and that can preserve the significance of conservation areas by avoiding potential for harm to their settings.
- 8.138 Proposals for development at Rawlings Green require a strong landscape framework. Substantial landscaping is needed to the east and north. Although essentially a matter for more detailed master planning of the site it is clear at this stage that further landscaping will be needed within the development. A lower density of development and a scale of development less than first estimated at step 3 should therefore be considered.
- 8.139 New buildings on the site should also tend toward a domestic scale and avoid bulky individual buildings that could well be an incongruent visual intrusion. The form of permissible employment uses is modified to reflect this approach. B8 uses, that involve warehousing and distribution uses are therefore not proposed.
- 8.140 Transport and accessibility evidence indicates that this area, compared to others, has greater accessibility to the town centre. This suggests, subject to following a sequential approach, that the area may be suited to some town centre uses⁵⁹ that cannot be accommodated within the town centre or other uses that may involve a benefit from being in reasonable proximity to the town centre. Proposals for the site can therefore recognise this potential by introducing a slightly wider range of potential employment provision than the other sites⁶⁰. This wider scope also therefore provides for different building forms that can be smaller in scale and bulk and with less visual impact. Proposals can provide for buildings that are of a more domestic scale and character that are therefore much more capable of being situated within a mix of uses, not restricted to being situated for instance within an industrial estate or business park setting.

Heritage assets – protecting their significance

- 8.141 The evidence identifies several heritage assets within each of the sites forming the preferred strategy. It outlines their significance and where their significance may be harmed by development within their setting. Great weight has been attached to their conservation when considering the impact of a proposed development on their significance. It has been concluded that less than substantial harm will result.

⁵⁹ National Planning Policy Framework, Glossary, DCLG (Mar 2012) (CNPP/01)

⁶⁰ Chippenham Site Allocations Plan: Pre-Submission Draft Plan, paragraph 5.14, Wiltshire Council (Feb 2015) (CSAP/01)

- 8.142 Specific proposals of the Plan, nevertheless, must look not only to ensure as a minimum that less than substantial harm results but also seek to avoid all harm reflecting the Council's statutory duties to have special regard to the desirability of preserving listed buildings or their settings and special attention to the desirability of preserving or enhancing the character or appearance of a designated conservation area.
- 8.143 The significance of heritage assets is a matter highlighted in the results of sustainability appraisal. Planning policy wording needs to make particular reference to the heritage assets found within each site and that may be affected beyond the site. Proposed modifications already make specific reference to the need for detailed heritage assessments of each site in order to understand, amongst other things, the significance of assets. Further proposed modifications will identify the particular known assets that should be subject to assessment and that require particular protection.

Traffic impacts

- 8.144 Traffic modelling evidence has assessed the impact of development proposals without mitigation. Without mitigation congestion in the town centre and elsewhere will increase.
- 8.145 The same modelling evidence also helps to indicate threshold points by when mitigation measures need to be in place before there is the potential for unacceptable traffic impacts upon the local network. Development proposals are therefore linked to threshold scales of development by when particular measures will need to be provided. These thresholds involved proposals for SW Chippenham. Previously it was considered that if all of the site was developed without completion of the CLR there would be unacceptable traffic impacts on the local network. Further detailed work has developed local mitigation to remove this constraint.
- 8.146 At Rawlings Green, there must be completion of a link between Cocklebury Road and the B4069 to be open for use, prior to the occupation of the 200th dwellings (the Cocklebury Link Road).
- 8.147 This requirement provides a milestone for the co-ordination of development that require closer collaboration between land owners and prospective land owners.

Delivery

- 8.148 The juxtaposition of 'big ticket' costly items of infrastructure alongside a priority to provide affordable housing inevitably raises concern over whether both can be afforded. Viability assessment shows that each of the sites within the strategy are capable of providing policy compliant levels of affordable housing whilst supporting the necessary infrastructure to enable their development.
- 8.149 An assessment identified a range of risks that might affect delivery of the mixed strategy. They need to be removed or the likelihood and consequences of them occurring managed to a minimum. A risk register summarises risks to delivery, measures to mitigate them and who is responsible for each of the actions necessary. The risk register forms a part of the monitoring framework to the Plan.

- 8.150 Planning controls alone are effective up to a certain point as a means of delivery. A development plan can set out development proposals as the basis for the equalisation of land values where appropriate. Proposals can require a number of mitigation measures and also set trigger points to ensure their timely delivery. A plan can set out infrastructure requirements and burdens on the developer and land owner in respect of Community Infrastructure Levy and possible funding contributions as planning obligations. The Plan can ensure that, as far as possible at such a high level planning stage, the scale and form of development can support developer profits, infrastructure costs and appropriate levels of affordable housing. Master planning and the consideration of individual planning applications take forward principles and requirements of the plan.

South West Chippenham

- 8.151 Proposals for SW Chippenham have been progressed over a number of years already by one set of developers and land owners. Their interests account for the vast majority of land allocated and can be termed the 'main site'. Here constraints and costs have been examined in some detail. The main site is being relied upon as a chief contribution to the immediate supply of deliverable land necessary to meet national planning policy requirements.
- 8.152 Some land neighbouring the proposal will eventually be enveloped as the main site is implemented. They are termed as 'further sites'. These additional, more ad hoc parcels of land, should not create delay or uncertainty. Equally, permission for the main site will not prejudice these additional sites from coming forward. Further sites would attach to the main proposals following the lead and pattern provided by the main one. Separate proposals for SW Chippenham can therefore proceed solely through the planning process with relatively little complication, resulting in deliverable land for both housing and employment.
- 8.153 The policies map should be amended to show the main and further sites as well as land allocated for mixed use and green space.

Rawlings Green

- 8.154 Master planning is underway and although inevitably there are a number of issues, notably about the protection of heritage assets and the mitigation of visual impacts on the countryside, none of these considerations appear at all insurmountable.
- 8.155 A central consideration is the delivery of a Cocklebury Link Road. Rawlings Green is of a scale that it is necessary for it to have at least two different points of access.
- 8.156 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 just two independent accesses. Development of the site requires construction of a link road from Cocklebury Road via Darcy Close to Parsonage Way and the B4069.
- 8.157 The overall result is a Cocklebury Link Road. This is necessary for development to be acceptable in highway terms and is directly related to the development and appropriate in scale and kind. Construction would be an express part of any development scheme permitted and built by the site's developers. The same

approach forms part of the consent granted to development at North Chippenham that will complete a link from Parsonage Way to the A350. Construction will progress a distributor standard road in stages as development proceeds.

- 8.158 Agreement are understood to be in place to deliver an access over the railway and along Parsonage Way. The Council (as land owner) supports providing land to deliver the second access to Cocklebury Road. Current planning applications apply for consent for detailed schemes for each. The policies map may be amended to show the CLR and therefore indicate safeguarding of the land needed.
- 8.159 Key risks around access, identified in the assessment are therefore being tackled directly.

9. Step 9: Sustainability Appraisal of Preferred Development Strategy

Objective: To ensure the preferred development strategy delivers the Plan's objectives informed by Sustainability Appraisal

Introduction

- 9.1 Step 8, selecting a preferred strategy, culminated in a set of proposed modifications to the Plan. The preferred strategy, in the form of revised plan proposals, has then been subject to Sustainability Appraisal to assess whether further refinements may be necessary to ensure the Plan delivers the sustainability benefits and mitigation that are sought.
- 9.2 This Appraisal considers:
- further changes in development components:
 - the removal of components / statements that are not environmentally sustainable:
 - the addition of new components / statements;
 - including 'protective' statements requirements to substitute or offset for certain types of impacts, for instance, through projects that replace any benefits lost; and/or
 - requirements in terms of reference for Environmental Impact Assessment and master plans for plan proposals, with detail on aspects of such as further landscape or traffic assessment
- 9.3 The results of the detailed assessment are set out in an updated note on proposed modifications attached to the draft revised sustainability appraisal. A first stage considered the changes to establish their implications with reference to the results in the SA Report of the Pre-Submission Draft Plan and July 2015 Sustainability Appraisal Note. Where changes were considered to materially change a policy, a revision of the previous SA assessment has been undertaken and further assessments undertaken as necessary.
- 9.4 Proposals for East Chippenham have been removed from the Plan. Sustainability appraisal has reported the likely effects of alternative development strategies that include these proposals and those that do not, including the selected one taken forward as the preferred strategy (See Chapter 7). This step carries out further assessments for all the policies that will be contained in the preferred strategy. The Sustainability Appraisal Note also reviews the combined effects of those policies.

Summary of recommendations and further amendments to draft proposed modifications

- 9.5 The appraisal of the preferred strategy draft modifications has made the following additional recommendations suggesting amendments to the Plan's policies. The following table records each one and the response to it.

Policy	Sustainability Objective	SA Note Recommendation	Response	Further Amendment
CH1	2	<p>The policy should indicate that:</p> <ul style="list-style-type: none"> - land contamination surveys will be carried out at Showell Nursery and Chippenham Shooting Range prior to development taking place. - design and layout of development must not result in the sterilisation of viable mineral resources. 	<p>Wiltshire Core Strategy (WCS) (Core Policy 56) and Development Management Minerals Plan policies (MDC4 address these aspects</p> <p>These are detailed aspects that are dealt with at master plan and planning application stages.</p>	
	5a	<p>The policy should indicate that the proposed development will be required to consider the provision of on-site renewable or very low carbon energy generation.</p>	<p>WCS Core Policy 41 already addresses this aspect</p>	
	5b	<p>A buffer zone between Pudding Brook and development should be provided as part of development.</p>	<p>Reference to identifying precise boundaries to flood zones is already referred to, but need for a particular reference is accepted</p>	<p>Amend first sentence of paragraph 5.9 as follows:</p> <p>“The precise flood zone boundaries to the Pudding Brook will need to be defined and protected from development.”</p>
	9	<p>The proposed policy should require that existing PRoWs are considered and incorporated in the development where feasible. Where loss or alteration is unavoidable alternative routes should be provided.</p>	<p>WCS Core Policy 60 already addresses this aspect</p> <p>These are detailed aspects that are dealt with at master plan and planning application stages</p>	

Policy	Sustainability Objective	SA Note Recommendation	Response	Further Amendment
	12	The policy should recognise the need to improve the connections between the employment areas being created and Methuen Business Park	Reference to this opportunity should be highlighted in the supporting text	Add additional sentence to the end of paragraph 5.7 as follows: “Opportunities should also be explored to improve connections from the site to the Methuen Business Park”
CH2	2	The policy should indicate that: - the loss of soil resources can be mitigated by re-using as much of the surplus resources on-site for amenity spaces and disposing any surplus soils thereafter in a sustainable manner (i.e. as close to the site as possible and to an afteruse appropriate to the soil's quality).	This is a detailed aspects dealt with at master plan and planning application stages.	
	7	The policy should require that proposals for the CLR should demonstrate how the design of the route minimises the visual impact and effects to local amenity.	Reference to this aspect should be highlighted in the supporting text	Add additional sentence to paragraph 5.17 as follows: “Road proposals should demonstrate how the design of the route minimises visual impact and effects on local amenity.”
CH4	1	Paragraph 5.30 of the Plan indicates that further work is being undertaken to develop the ownership, governance and detailed management of the country parks. It is recommended that the Council considers other sources of funding, apart from planning obligations relating to	The Council is considering other funding streams as part of the work mentioned.	

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Policy	Sustainability Objective	SA Note Recommendation	Response	Further Amendment
		individual sites, in order to ensure the long term management of the country parks.		

9.6 Further amendments to the Plan therefore form part of the draft proposed modifications as set out in Step 10.

10. Step 10: Proposed Modifications to the Plan and Revised Evidence

- 10.1 The conclusion to the review has resulted in a list of proposed modifications to the submitted Plan.
- 10.2 Undertaking the review has involved additional and revised evidence. Many of the assessments form appendices to this report and are therefore listed on the contents page.
- 10.3 Work has also been commissioned to provide independent and specialist input and this is published separately on the Council's website. These reports are:

Sustainability Appraisal

- Sustainability Appraisal Non-Technical Summary
- Sustainability Appraisal Methodology
- Sustainability Appraisal Review of SA of strategic areas (Step 1)
- Addendum 1 - Assessment of Strategic Site Options (Step 4)
- Addendum 2 - Assessment of Alternative Development Strategies (Step 7)
- Proposed changes to Pre-submission Plan: Sustainability Appraisal Note (Step 9)

Revised Transport and Accessibility evidence

- Chippenham Site Allocations Plan: Supplementary Transport & Accessibility Evidence: Part 1a - Assessing Strategic Site Options (Steps 4 and 5)
- Chippenham Site Allocations Plan: Supplementary Transport & Accessibility Evidence: Part 2a - Assessing Alternative Development Strategies (Steps 7 and 8)
- Improving Highway Network Resilience at Chippenham
- Viability Assessment
- Chippenham Site Allocations Plan: Site Viability Assessment

Chippenham Site Allocations Plan Site Selection Report

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This document was published by the Spatial Planning team, Economic Development and Planning, Wiltshire Council.

For further information please visit the following website:

[www.wiltshire.gov.uk/planninganddevelopment/planningpolicy/
chippenhamsiteallocationsplan.htm](http://www.wiltshire.gov.uk/planninganddevelopment/planningpolicy/chippenhamsiteallocationsplan.htm)