

**Wiltshire Council**

**Cabinet**

**1 December 2020**

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**From Cllr Nick Murry**

**To Cllr Toby Sturgis – Cabinet Member for Spatial Planning, Development Management and Property**

**Item 8 – Consultation to Inform the Wiltshire Local Plan Review**

**Statement**

Gro Harlem Brundtland's now universally accepted definition of sustainable development is: "development that meets the needs of the present without compromising the ability of future generations to meet their own needs." For the people of Wiltshire's sake, Wiltshire Council, or rather its Cabinet members, need to think seriously about what this means.

It should be clear to by now that Wiltshire Council cannot continue to promote and facilitate 'business as usual' and that what may have worked in the past, is not appropriate for a sustainable and resilient future. Nowhere is this truer than in relation to spatial and transport planning.

Large urban extensions that promote car dependency, create even bigger commuter towns and drive up carbon emissions are part of an out-dated model for development. So too is 'predict and provide' transport planning, which simply perpetuates a cycle of generating more traffic, requiring more roads, which promotes more traffic, and so on.

Such antiquated thinking also fails to attribute economic value to irreplaceable natural assets, treating them as short term and expendable, with minimal regard for their current benefits or the longer term implications of their removal.

Wiltshire's 'natural capital' provides a range of valuable ecosystem services, including carbon capture and storage (in soils and trees), natural drainage and cleansing of the environment, wildlife habitats, biodiversity benefits (pollination of crops) and public amenity and wellbeing. It also includes farmland, some of it the 'best and most versatile' in the country, important at a time of increasing need for local food production and for national food security (as import prices rise as a result of climate change).

In addition to the destruction of these assets, this 'in-migration, out-commuting' development model the Cabinet continues to pursue creates huge additional costs, which in the past have simply been externalised and left for future generations to pick up. This critically includes the future costs of climate damage as a result of

additional carbon emissions generated and/or the costs of the additional mitigation that will be needed as a result. All this during a Climate and Ecological Emergency in response to which the Council has pledged “to seek to make the county carbon neutral by 2030.” Destroying natural capital, removing carbon sinks and generating more additional carbon emissions is unlikely to achieve this.

Further irony (or perhaps a case of adding insult to injury as far as the next generation is concerned) is that the unsustainable housing numbers don't even address local housing need, and are based on a formula grounded in house prices as an indicator of market demand (not local housing need, which is a fraction of the proposed housing numbers).

The proposals being put forward for Chippenham are a case in point. An urban extension the size of a small town is proposed that would destroy irreplaceable natural assets, permanently removing carbon sinks, natural flood prevention, wildlife habitats, historical landscapes and valued public amenities, whilst generating huge quantities of additional carbon emissions and the misery of even more traffic congestion for those who live here (traffic from the additional houses far outweighing the effect of the proposed housing distributor road).

The proposals were developed on the back of a Housing Infrastructure Fund (HIF) bid that required well over twice the number of houses (7,500) to be built than had been previously proposed (c.3,000) and effectively predetermined the next stages of the Local Plan Review as far as Chippenham is concerned. Endorsement for the HIF bid was obtained from Chippenham Town Council in 2018 without it even being discussed at a Town Council meeting. When Town Councillors were finally informed in 2019, they were told by the Leader of Wiltshire Council to keep it confidential. The HIF bid was never discussed at a Wiltshire Council meeting. To date, there has been no public consultation on these proposals and despite assurances to contrary, it now seems they have been worked up to become the preferred site options in the Local Plan Review. Still without public consultation and lacking evidence as basic as the methodology that resulted in this 'selection'. *A fait accompli* it would seem.

I therefore have a number of questions for Cllr Sturgis:

### **Question 1**

What value has been calculated for the natural capital that would be permanently lost as a result of the preferred options being developed for:

- a) the county (less Swindon)?
- b) the Chippenham Housing Market Area?
- c) Chippenham?

### **Response**

No value has been calculated.

### **Question 2**

What methodology has been used to calculate this and where can it be found?

**Response**

See response to Question 1.

**Question 3**

What value has the Council declared on its Balance Sheet for the County farms and any other publicly owned land that it intends to develop for:

- a) the county (less Swindon)?
- b) the Chippenham Housing Market Area?
- c) Chippenham?

**Response**

The existing use value for County farms at Chippenham is £ 2.87m.

**Question 4**

What has been recorded in the Council's Environmental Risks Register (or Risk Register) in relation to potential development on the County farms and any other publicly owned land that it intends to develop?

**Response**

As part of the statutory planning process Environmental Impact Assessments and surveys will be carried out, which may give rise to environmental mitigations being required and that the risk associated with this has been recorded and a mitigation plan is in place. There is an existing environmental risk in the project risk register.

**Question 5**

What is the Council's calculation for the quantity of carbon (tonnes CO<sub>2</sub>e) that:

- a) are currently sequestered by soils and vegetation on its preferred site options in Chippenham?
- b) will be emitted from soils and vegetation, as a consequence of development of the preferred options in Chippenham?
- c) will be generated as a result of the estimated additional settlement and traffic created by development of the preferred options in Chippenham?

## **Response**

No calculation has been undertaken in relation to the work on the Local Plan.

## **Question 6**

How does the Council plan to mitigate these carbon sequestration losses and the additional carbon emissions generated?

## **Response**

As anticipated by the National Planning Policy Framework (paragraph 170) the development of planning policies and proposals for development should contribute to and enhance the natural and local environment.

Therefore, as the Local Plan is developed, mitigation measures will also be developed including measures to address, as far as is reasonably practicable, carbon emissions.

## **Question 7**

What is the Council doing in terms of identifying, measuring and putting a value on its direct and indirect ecological impacts and dependencies on natural capital?

## **Response**

The planning system requires that the process of plan making delivers sustainable development and is supported by Sustainability Appraisal and Strategic Environmental Assessment.

The development of ecological measures to address potential harm is integral to sound plan making. For example, the preparation of the concept plans anticipates requirements for net-biodiversity gain signalled in the Environment Bill.

## **Question 8**

How does the Council plan to mitigate the loss of natural capital and ecosystem services associated with the proposed development in:

- a) the county as whole (less Swindon)?
- b) Chippenham?

## **Response**

See response to question 6.

**Question 9**

How does the Council factor in the value of agricultural land/ food production (in general) and the value of its County Farms (in particular)?

**Response**

The Local Plan uses data on agricultural land value supplied by Natural England to assist with the process of appraising sites for the purpose of plan making.

**Question 10**

What are the Agricultural Land Classification grades within the preferred sites and the alternative sites put forward for Chippenham?

**Response**

The proposed and reasonable alternative sites at Chippenham are underlain with Grade 3 and 4 agricultural land.

**Question 11**

Where can the public see the basis of and methodology for the 'sustainability appraisal' and who carried this out?

**Response**

The Interim Sustainability Appraisal (including the revised Scoping Report, September 2020) will be made available as part of the consultation materials for the Local Plan consultation early in the new year (see paragraph 29 of the Cabinet report).

The work is being carried out by the Council (Spatial Planning), as is common practice.

**Question 12**

Where can the public see the basis of and methodology of the housing needs calculation for Chippenham?

## **Response**

Forecast housing need for the Chippenham Housing Market Area, including calculation of the Government's Standard Method, is contained in the document: 'Swindon Borough and Wiltshire Council Local Housing Needs Assessment 2019, ORS (April 2019)', which was considered by Cabinet in April 2019. Paragraph 3 of the Cabinet paper provides a link to the papers for that meeting.

Further explanation and summary are provided in the Emerging Spatial Strategy, in appendix one to the report to Cabinet. Further supporting information will be made available as a part of the consultation in the new year.

## **Question 13**

What relation (if any) does this bear to actual local housing need (i.e. local people seeking housing or people seeking to relocate for local employment?)

## **Response**

At least seventy percent of all house moves, including to new dwellings, take place within each Housing Market Area. A minority therefore take place from elsewhere within Wiltshire or further afield.

A detailed explanation of the various components that help forecast housing need is provided in the document referred to in the response to question 12.

## **Question14**

Where can the public see a calculation of the carbon emissions and pollutants (NO<sub>x</sub>, particulates) emitted from the additional vehicles resulting from the 7,500 houses and use of the distributor road by external traffic?

## **Response**

No calculation has been done as part of the Local Plan process at this early stage. Further evidence will be commissioned, as appropriate, as the draft Plan is developed.

## **Question15**

What is the probability that the Council will pause for thought, adopt a more enlightened, genuinely sustainable approach and adapt its Local Plan accordingly, relative to the probability that the HIF bid has essentially predetermined will happen in Chippenham?

## **Response**

No part of the review of the Local Plan is pre-determined. This early informal consultation comes before a draft plan is prepared. The results of the consultation will help shape its content to better achieve sustainable development, the purpose of the Plan and the planning system.