

**Wiltshire Council**

**Council**

**10 May 2016**

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**Draft Chippenham Site Allocations Plan: Update**

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**Executive Summary**

Examination of the Draft Chippenham Site Allocations Plan (the Plan) was suspended in November 2015 to allow the Council to undertake further work on a number of matters raised by the Inspector regarding the soundness of the evidence base. This further work is set out in a Schedule of Work submitted to the Inspector on 4 December 2015, designed to respond to the matters he raised relating to the site selection procedure, adequacy of sustainability appraisal and deliverability of the Plan's proposals.

The Inspector has been clear that whilst he had not found the Plan unsound he considered there to be flaws with the evidence base that need to be addressed in order for the Plan to be taken forward. He has recognised that the outcome of the Schedule of Work "*must include the possibilities that, either the chosen strategy would be vindicated by new evidence or that a reasonable alternative would be shown to provide a better plan*".

Officers have implemented the Schedule of Work with an open mind, following the evidence, and have set out their findings and judgements in a new Site Selection Report. Consultants have been involved in the process through the preparation of: Sustainability Appraisal, supplements to the transport and accessibility evidence and viability assessment.

Fourteen individual Strategic Site Options have been considered which formed the building blocks for four reasonable alternative development strategies - 'Eastern Link Road', 'Southern Link Road', 'Submitted Plan' (the Plan) and 'Mixed' Strategies providing for 2,000, 2,450, 2,500 and 2,050 new homes respectively and employment land between 21 and 28 hectares, with the 'Submitted Plan' having an additional 15 hectares of land safeguarded for the longer term (post 2026).

Having considered the evidence, the Mixed Strategy is the preferred development strategy and on balance is the most sustainable option for the Plan period, which has just ten years remaining. In identifying the Mixed Strategy, as the preferred development strategy consideration has been given as to whether it was 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).

The Mixed Strategy can be considered as a first phase of the Submitted Plan Strategy, as it comprises an enlarged South West Chippenham allocation (Policy CH1) and Rawlings Green allocation (Policy CH2). The evidence shows that with appropriate mitigation all strategies may be capable of being identified for development through a subsequent Plan. It is important therefore that this Plan does not compromise the future longer term growth of the town and therefore its policies reflect the need to allow for road links to be connected as part of future development proposals.

The Mixed Strategy has the benefit of:

- early delivery of employment land (that is attractive to business) and housing land;
- delivery of housing during the Plan period at a level more closely aligned with the residual requirement;
- delivery of the Cocklebury Link Road linking the east of the town to the A350 via permitted development at North Chippenham mitigating the adverse impacts of growth on the local roads;
- Improving sustainable access via an enhanced river corridor providing links to the town and countryside along the River Avon consistent with the Chippenham Vision.

The more ambitious strategies (Submitted and Southern Link Road) have greater risk of delivery thus less certainty and result in higher levels of development beyond the Plan period. The Eastern Link Road Strategy is dependent on delivery of infrastructure and therefore compromises early delivery of employment land (attractive to businesses) and housing.

The Proposed Modifications arising from implementing the Schedule of Work will form part of a comprehensive schedule of changes to the Plan and will include those already put to the Inspector as part of the Examination process where they still remain valid. These mainly relate to the 'Proposed Changes' that were approved by Council for submission to the Secretary of State for Examination alongside the Plan in July 2015, which have been reviewed and updated in the light of implementing the Schedule of Work.

Completion of the work, in relation to the Schedule of Work in response to the Inspector's concerns, enables the Council to submit additional evidence and Proposed Modifications to the Examination to support the progression of the Chippenham Site Allocations Plan through Examination.

As agreed with the Inspector, following approval by Council, the Proposed Modifications to the Plan and revisions to the evidence base will be submitted to the Inspector for his consideration and consultation will be undertaken in advance of the hearing sessions resuming.

Following the consultation, Officers will collate the consultation responses and submit these to the Inspector to enable the hearing sessions to be resumed.

## **Proposals**

That Council, having considered the outcome of the Schedule of Work and accompanying evidence:

- (i) Approves the Proposed Modifications to the Plan as set out in **Appendix 3** subject to amendment in (iii) and the Equalities Impact Assessment (**Appendix 4**);
- (ii) Notes that consultation will be undertaken on the Proposed Modifications and revisions to the evidence base through implementing the Schedule of Work and the results of the consultation sent to the Inspector;
- (iii) Authorises the Associate Director for Economic Development and Planning in consultation with the Associate Director for Legal and Governance and the Cabinet Member for Strategic Planning, Development Management, Strategic Housing, Operational Property and Waste be delegated authority to:
  - a) finalise the accompanying evidence documents which comprise the outcomes of the Schedule of Work and make any necessary minor changes to the Proposed Modifications in the interests of clarity and accuracy before they are submitted to the Inspector and published for consultation;
  - b) make arrangements for the above consultation and any subsequent consultations that may be requested by the Inspector;
  - c) respond to the consultation(s) and recommend any further modifications to the Inspector that may arise in response to the consultation or as part of the Examination; and
  - d) implement any consequential actions in relation to the Examination process.

### **Reason for Proposals**

To ensure that progress continues to be made on the Examination of the Draft Chippenham Site Allocations Plan and the Plan is progressed towards adoption; and also to inform Council of the next steps.

A number of Proposed Modifications should be made to the Plan, as approved for submission by Council in July 2015, as a result of the implementation of the Schedule of Work.

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

**Wiltshire Council**

**Council**

**10 May 2016**

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**Draft Chippenham Site Allocations Plan: Update**

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**Purpose of Report**

1. To:
  - (i) Inform Council of the outcome of the Schedule of Work undertaken to address the concerns of the Inspector conducting the Examination of the Plan and the next steps.
  - (ii) Seek Council's approval of the Proposed Modifications to the submitted Plan and submission of the outcomes of the Schedule of Work to the Inspector.
  - (iii) Seek delegated authority to ensure the efficient progression of the Examination.

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

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

**Background**

3. On 14 July 2015 Council approved the submission of the draft Chippenham Site Allocations Plan (the Plan) together with proposed changes to the Secretary of State for examination. The Plan was subsequently submitted on 30 July 2015. Both documents have been provided with the [Agenda papers](#) accompanying this report.

4. The appointed Inspector, Patrick Whitehead, wrote to the Council on 18 September setting out his Initial Appraisal of the Plan to which the Council responded. On 5 October, the Inspector confirmed that on the basis of the Council's response he was content for the Examination to proceed to the hearing sessions. The hearings opened on 10 November and were programmed to run until 19 November 2015. On day two, the Inspector suspended proceedings when he raised concerns about the evidence supporting the Plan.
5. The Inspector set out his concerns in letters to the Council of 16 and 30 November 2015. In response the Council wrote to the Inspector on 4 December 2015 and provided a Schedule of Work designed to address his concerns. For ease of reference this is attached at **Appendix 1**. The Inspector responded on 9 December 2015 acknowledging the Council's comprehensive response to his request for the schedule and timetable of work.
6. Councillors Briefing Notes (No.s 266, 267 and 268) have been prepared and circulated following suspension of the examination to inform all Councillors about the Inspector's concerns and the Schedule of Work being undertaken.
7. A public meeting was held between the Council and the Inspector on 21 January 2016 to review progress on the Schedule of Work, together with the timetable for the completion of that work and a further update provided in writing on 18 March 2016. The Inspector clarified that:

*"...whilst he had not found the evidence base adequate in its support of the chosen strategy, the outcome of the additional work must include the possibilities that, either the chosen strategy would be vindicated by new evidence or that a reasonable alternative would be shown to provide a better plan."*

(Paragraph 2.3, Notes of Progress Meeting 21 January 2016)

8. All communications between the Council and Inspector and notes of the progress meeting are provided in chronological order on the Council's website at:  
[http://www.wiltshire.gov.uk/planninganddevelopment/planningpolicy/chippenham/siteallocationsplan/chippenham\\_examination.htm](http://www.wiltshire.gov.uk/planninganddevelopment/planningpolicy/chippenham/siteallocationsplan/chippenham_examination.htm)
9. Cabinet on 19 April 2016 noted the progress being made with the examination of the Draft Chippenham Site Allocations Plan including the work being undertaken pursuant to the Schedule of Work agreed with the Inspector appointed to examine the Plan. That report recognised that the outcome of the Schedule of Work would be presented to Council on 10 May 2016 for endorsement prior to submission to the Inspector and start of the consultation.

## **Main Considerations for the Council**

### Matters raised by the Inspector

10. The Schedule of Work was designed to address the issues raised by the Inspector in relation to site selection procedure, adequacy of Sustainability Appraisal and deliverability of the Plan proposals. The main issues can be summarised as follows:

- (i) Site Selection Procedure:
    - the basis for and use of the ranking exercise relating to criteria within Core Policy 10 of the Wiltshire Core Strategy is not clear;
    - the two stage process results in some locations not being evaluated in the same detail as others before being rejected; and
    - the approach to delivering an employment led strategy.
  - (ii) Adequacy of Sustainability Appraisal (SA):
    - the two stage sequential site selection process and its influence on the SA;
    - the inclusion of detailed assessment for only three broad areas (B, C and E) rather than for all areas A to E; and
    - therefore, the concern that reasonable alternatives were not given proper consideration.
  - (iii) Deliverability of the Plan proposals:
    - the need for clarity regarding the role and character of the Eastern Link Road and to acknowledge its provision as a policy requirement;
    - how the Eastern Link Road (including bridges) can be delivered and funded alongside development and other infrastructure requirements;
    - the co-ordinated delivery of the Eastern Link Road; and
    - how the proposals comply with the Wiltshire Core Strategy on affordable housing.
11. The Schedule of Work sets out an enhanced methodology to site selection following a 10 step approach drawing on the substantial evidence already before the Examination and supplemented by new evidence documents. Implementation of the Schedule of Work has now been completed for Council consideration.
  12. Officers have implemented the Schedule of Work with an open mind by following the evidence. External consultants have been involved in the process through the preparation of: Sustainability Appraisal, supplements to the transport and accessibility evidence and viability assessment. In addition, implementation of the Schedule of Work has benefitted from critical friend support from Planning Officer Society Enterprises, secured through funding from the Planning Advisory Service.
  13. The Inspector at the progress meeting in January took the opportunity to reiterate a number of areas that should be addressed through undertaking the Schedule of Work in order to ensure soundness (paragraphs 3.1 to 3.8, Notes of Progress Meeting, 21 January 2016). These related to: revisiting the flood risk evidence in relation to Area C; revisiting the transport and accessibility evidence; need for specific policy on Eastern Link Road if it forms part of proposals; need for further Viability Assessment; justification for built development east of River and north of the A4 if it forms part of proposals due to landscape considerations; use of illustrative land uses on proposal plans; and clarification on viability of country parks as part of proposals. How these are being responded to is discussed in turn below, before a summary is provided on the main findings arising through implementing the Schedule of Work.

14. The flood risk associated with Area C has been considered through implementing the Schedule of Work. Officers have engaged with the Environment Agency to understand the emerging outputs from the modelling work that is currently being completed and any implications for the Plan. The purpose of the modelling is to better define the flood zone with more up to date flood information. The modelling has not significantly altered the extent of Flood Zones 2 and 3 adjacent to the sites proposed in the Submitted Plan; as such, the Environment Agency does not object to its proposals. They have reiterated that built development should be constrained to parts of the site in Zone 1 with a buffer between the development and Flood Zones 2 and 3 to accommodate any refinement of the flood zones. In addition, the need for the criteria within policy to ensure that runoff does not exceed Greenfield rates and appropriate land is set aside for sustainable drainage management measures is reaffirmed. Built development can be accommodated in Flood Zone 1 in accordance with the National Planning Policy Framework.
15. The transport and accessibility evidence has been reviewed and updated to support the final selection of sites for development, as follows and has been published alongside the [Agenda papers](#):
  - (i) Supplement to Evidence Paper 3: Transport and Accessibility Part 1A - Strategic Site Options
  - (ii) Supplement to Evidence Paper 3: Transport and Accessibility Part 2A - Alternative Development Strategies

Supplement 1A updates the methodology to include accessibility heat maps that relate to the individual Strategic Site Options being assessed and relationship to the rail station. Supplement 2A assesses the merits of the four alternative development strategies identified in paragraph 21 and their forecast highway networks impacts with and without mitigation (Table 4-1 summarises the findings).

16. For completeness, even though a full Eastern Link Road does not form part of the Plan's proposals, a position statement has been prepared to illustrate the role and character of such a road as well as a Southern Link Road. This is called 'Improving highways network resilience at Chippenham' and is available as part of the [Agenda papers](#). This includes the costings for each section of the roads and has informed the viability assessment of the alternative development strategies. It also helps explain the preferred development strategy as set out below should not compromise the future delivery of such road links should development proposals to facilitate their delivery be acceptable in the future.
17. Viability Assessment has been reviewed and updated to assess the viability of each of the Strategic Site Options that form the alternative development strategies. This has been used to inform Step 8 and the selection of the preferred development strategy. It is available as part of the [Agenda papers](#) - Chippenham Strategic Site Viability Assessment, April 2016.
18. Landscape considerations have formed part of the work undertaken to implement the Schedule of Work including the sensitivity of the area east of the

river and north of the A4 (land in Area C). This included assessing the landscape sensitivity of an Eastern Link Road and forms part of the position statement referred to in paragraph 16. However, built development in this area no longer forms part of the Plan proposals.

19. The form of the illustrative plans 'Figure 4.1, Proposed Allocations' has been reviewed and will only indicate 'mixed use' and 'greenspace' land uses rather than providing indicative layouts for 'employment', 'residential' and 'greenspace' that may change through the development of the masterplan. For South West Chippenham where the employment land is established a modification is proposed to Policy CH1 to clarify that the employment land will be provided adjacent to the A350.
20. In relation to Country Parks, a statement is being prepared that will be made available for the consultation and respond to the Inspector's concerns about the viability of the Country Park proposals. This will provide assurance that the scale of obligations does not undermine the viability and deliverability of sites by illustrating the nature and form such parks can take. The Country Parks will not require significant investment as the emphasis is on retaining their open character and securing appropriate public access, while supporting their long term management largely in their continuing agricultural uses (grazing).

#### Key findings

21. Steps 3 and 6 were particularly important parts of the process as the identification of the Strategic Site Options through Step 3 formed the building blocks for the reasonable alternatives that were identified in Step 6. Fourteen Strategic Site Options were considered that led to the identification of four reasonable alternative development strategies in Step 6 as follows:

<b>Strategy Name</b>	<b>Site Option</b>	<b>Employment (ha)</b>	<b>Housing</b>
Eastern Link Road	B1 (Rawlings Green) and C4 (East Chippenham)	21.00 (5 and 16)	2,000 (650 and 1,350)
Southern Link Road	D7 (South of Pewsham) and E5 (South West Chippenham)	28.60 (10.5 and 18.1)	2,450 (1,050 and 1,400)
Submitted Plan	B1 (Rawlings Green), C1 (East Chippenham) and E2 (South West Chippenham)	28.10 (5, 20 and 18.1)  (incl.15 post 2026)	2,500 (650, 850 and 1,000)
Mixed	B1 (Rawlings Green) and E5 (South West Chippenham)	23.00 (5 and 18)	2,050 (650 and 1,400)



22. The Eastern Link Road Strategy is based around the delivery of two allocated sites with primary schools on each site and land reserved for the expansion of Abbeyfield School. Together with the permitted development at North Chippenham it would result in the provision of new road infrastructure including bridges over the railway and River Avon connecting the A4 to the A350 - an Eastern Link Road. It represents a less ambitious strategy to the Submitted Plan in identifying a scale of growth more closely aligned to the 'at least' residual requirement of the 4,510 homes to be provided in the Core Strategy plan period.
23. The Submitted Plan Strategy comprises three allocated sites, each with primary schools providing for development to the East and South West of the town. Similar to the Eastern Link Road Strategy it would result in the provision of an Eastern Link Road.
24. The Mixed Strategy is based around the delivery of two sites both with primary schools within the Submitted Plan Strategy and recognises greater potential for growth in the South West. It represents a less ambitious strategy than the Submitted Plan and results in development more closely aligned to the 'at least' residual requirements of the Plan. It would result in the provision of new road infrastructure (Cocklebury Link Road) providing a link over the railway from Parsonage Way to connect the site with permitted development at North Chippenham and A350.
25. The Southern Link Road Strategy is based around the delivery of two allocated sites to the south of the town both with provision for primary schools. It would result in the provision of new road infrastructure including a bridge over the River Avon connecting the A4 at Pewsham Way to A350 - a Southern Link Road.
26. Both the Submitted Strategy and the Southern Link Road Strategies are more ambitious in terms of scale of growth and seek to provide longer term resilience for Chippenham through the delivery of new road infrastructure. The Eastern Link Road Strategy also provides for the delivery of such infrastructure town and thus longer term resilience but its greater reliance on infrastructure delivery means a lower level of growth during the Plan period.
27. The full explanation as to how the alternative development strategies and preferred development strategy have been derived is set out in the new 'Site Selection Report' that is published as part of the [Agenda papers](#). This is informed by additional Sustainability Appraisal work that has been published in three parts (in relation to Steps 1, 4 and 7) leading up to Step 8 through which the preferred development strategy is identified. These are also available as part of the [Agenda papers](#).
28. The evidence shows that subject to appropriate mitigation all strategies may be capable of being identified for development, if not now through a subsequent Plan. It is important therefore that this Plan does not compromise the future longer term growth of the town and its policies reflect the need to allow for road links to be connected as part of future development proposals.
29. Step 8 is provided in full at **Appendix 2**. This includes a SWOT (Strengths, Weaknesses, Opportunities and Threats) assessment of the reasonable

alternative development strategies and compares each strategy against the criteria contained in Core Policy 10 of the Wiltshire Core Strategy. This identifies the 'Submitted Plan' and 'Mixed' Strategies as having the most strengths and opportunities, with fewer weaknesses and threats.

30. To inform the overall selection of a preferred strategy a viability assessment, as discussed above, and Risk Assessment (included within the Site Selection Report) have been undertaken in order to understand the deliverability of each strategy; responding to the Inspector's concerns about delivery of proposals and affordable housing provision. The Risk Assessment also indicates the 'Submitted Plan' and 'Mixed' Strategies as performing better than the 'Southern Link Road' and 'Eastern Link Road' Strategies.
31. The main difference between the 'Submitted Plan' and 'Mixed' Strategies is the inclusion or not of Strategic Site Option C1 (East Chippenham) and the full Eastern Link Road. Step 8 recognises that there is a choice between 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).
32. If the allocations for each Strategy (Submitted Plan and Mixed) are compared with the more up to date residual housing requirement of 1,780 homes (1 April 2015), then the Submitted Plan is 17% (720 dwellings) above the 'at least' requirement of 4,510 homes whereas the 'Mixed' Plan is just 6% (270 dwellings).
33. A full discussion is provided in **Appendix 2** of the differences between the Strategies. Of note though are the differences in relation to the Eastern Link Road, which are summarised in full the Supplement to Evidence Paper 3: Transport and Accessibility Part 2A - Alternative Development Strategies at Table 4-1.
34. With the full Eastern Link Road and wider highway improvements the Submitted Plan Strategy results in 2% increase in average peak journey times and a reduction of 13% peak hour traffic flow through the town centre. For the Mixed Strategy average peak journey times will increase by 10% with or without wider highways improvements. In terms of peak hour traffic flow through the town centre arising from the Mixed Strategy this is only a 1% increase and is forecast to reduce by 6% once wider highways improvements are completed e.g. junction improvements to the Little George roundabout.
35. While non allocation of East Chippenham would give no certain basis for delivery of the full Eastern Link Road and the benefits it would bring, the Mixed Strategy can preserve the ability to provide this in the future. The Mixed Strategy could therefore be considered as a first phase of the Submitted Plan Strategy, as it comprises an enlarged South West Chippenham allocation (Policy CH1) and Rawlings Green allocation (Policy CH2).
36. As recognised in Step 8, the selection of the preferred strategy should be based on choosing the alternative with the greatest net support for economic growth

and settlement resilience when compared to the potential harm against Core Policy 10 criteria 2 to 6.

37. This needs to be considered against the findings of the Sustainability Appraisal of the reasonable alternative development strategies (Step 7), which concludes that:

*“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.”*

35. The finding within Step 8 is that the Submitted Strategy does not provide the net benefits sufficient to justify departing from the Sustainability Appraisal that recommends the Mixed Strategy.
38. In summary, the Risk Assessment identifies the Mixed Strategy as carrying the least risk of delivery and the Viability Assessment considers that policy compliant levels of affordable housing can be achieved alongside the infrastructure necessary to support development. In addition, the Mixed Strategy is considered to provide:
- (i) Sufficient land for employment development to meet strategic requirements that is well located and available - a central feature to the employment led strategy;
  - (ii) Sustainable supply of deliverable land for housing development for the plan period that can make a substantial contribution to meeting need for affordable housing supporting its resilience;
  - (iii) A Cocklebury Link Road linking the east of the town to A350 via North Chippenham permitted development 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; and
  - (iv) Improving sustainable access via an enhanced river corridor providing links to the town and countryside along the River Avon consistent with the Chippenham Vision.
39. The Mixed Strategy makes provision for 2,050 homes, of which around 105 homes are projected to be delivered over the period 2026 to 2028. This means that the proposed allocations, together with homes built and existing housing commitments at a base date of 1 April 2015 will be only 3.6% higher than the at least figure of 4,510. This does not take account of any additional windfall that may come forward over the remaining plan period, which will provide additional contingency and help support delivery of the ‘at least 4,510’ homes over the remaining 10 years of the Plan period.

### Proposed Modifications

40. Proposed Modifications have been prepared in response to implementing the Schedule of Work and to provide factual updates. These have been informed by Sustainability Appraisal (Step 9 of the Schedule of Work), which can be found with the [Agenda papers](#) on the Council's website.
41. The opportunity can also be taken to consult on other proposed changes that have been put to the Inspector as part of the Examination process, where they still remain valid following the implementation of the Schedule of Work. These mainly relate to the 'Proposed Changes' that were approved by Council for submission to the Secretary of State for Examination alongside the draft Plan together with any more recent proposed changes that arose as part of the examination process prior to suspension, e.g. through the preparation of statements of common ground or in response to matters raised by the Inspector that were to be discussed at the hearing sessions. This may save time later in the process.
42. A comprehensive list has been prepared that brings together all changes proposed so that it is clear which changes the Council is now recommending that the Inspector should make to the Plan. These are set out in **Appendix 3** and involve changes to policy and text.

### **Next Steps**

43. Subject to the resolution of Council, the next step is to finalise the documents arising from the Schedule of Work for submission to the Inspector so he can commence his appraisal and, as requested by the Inspector, consultation can be undertaken prior to the hearing sessions resuming. The documents to be submitted include:
  - (i) Chippenham Site Allocations Plan: Site Selection Report, April 2016
  - (ii) Amended and enhanced Sustainability Appraisal Report
  - (iii) Supplement to Evidence Paper 3: Transport and Accessibility Part 1A - Strategic Site Options
  - (iv) Supplement to Evidence Paper 3: Transport and Accessibility Part 2A - Alternative Development Strategies
  - (v) Chippenham Strategic Site Viability Assessment, April 2016
  - (vi) Position Statement - Improving highways network resilience at Chippenham, April 2016
  - (vii) Addendum to Evidence Paper 2: Housing and Community Facilities
  - (viii) Habitats Regulations Assessment - Update of the Chippenham Site Allocations Plan (April 2016)

- (ix) List of Proposed Modifications to the 'Pre-Submission Chippenham Site Allocations Plan February 2015' (April 2016)

The Addendum to Evidence Paper 2: Housing and Community Facilities has been prepared to provide additional information about air quality.

44. Consultation will take place for a period of six weeks and one day (to allow for the bank holiday) and is proposed to start on Monday 23 May 2016 and end Tuesday 5 July 2016. It will include:
- (i) Letter or email to consultees on Spatial Planning database who have an interest in the Chippenham Plan, providing notification of the consultation;
  - (ii) Online publication on the Council's website including consultation portal;
  - (iii) Publication of advertisement in local newspapers to cover Wiltshire and the Council's Parish/Town Council Newsletter;
  - (iv) Publication of press release on Calne, Chippenham and Corsham 'Our Community Matters' websites;
  - (v) Notification of the consultation to be distributed through the Chippenham, Corsham and Calne Area Board networks;
  - (vi) Officers to present at a briefing for the Chippenham, Calne and Corsham Community Areas during the consultation period - provisional arrangements made for 6 June 2016, 6.30pm to 8.30pm at Neeld Hall, Chippenham;
  - (vii) Documents being made available for viewing at the Council's main office hubs (Monkton Park, Chippenham; Bourne Hill, Salisbury; and County Hall, Trowbridge) and at Calne, Chippenham and Corsham libraries.
45. Following close of the consultation, comments submitted to the Council will be collated and forwarded to the Inspector as soon as possible but by mid-July. Officers will also review the comments and prepare a summary of comments raised broken down by policy and/or subject as appropriate (rather than a comment by comment list of individual responses) to assist the Inspector. Depending on the level of response the summary will be made available before end of July.
46. The Inspector has stated that with the submission of the consultation comments early July the hearing sessions could be resumed in October (letter of 23 March 2016).

### **Safeguarding Implications**

47. There are no safeguarding implications as a direct result of this proposal.

## **Public Health Implications**

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

## **Procurement Implications**

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

## **Environmental and Climate Change Considerations**

50. Spatial Planning has implications for the natural, economic and social environment. The Schedule of Work explicitly refers to Sustainability Appraisal, which remains an important part of the process (Steps 1, 4, 7 and 9 of the enhanced methodology). It is also necessary to ensure that the proposed changes do not have significant effects on the integrity of internationally important wildlife sites in line with European legislation and an update of the Habitats Regulations Assessment has been produced. This is provided in [the papers](#) accompanying the Agenda.

## **Equalities Impact of the Proposal**

51. The Plan aims to positively manage growth at Chippenham in accordance with the Wiltshire Core Strategy, which itself was informed by significant consultation in relation to growth at Chippenham. The proposed consultation will be carried out in a similar way as the previous consultation assessed in the Equalities Impact Assessment already submitted to the Secretary of State when the Plan was submitted for Examination.
52. An updated Equalities Impact Assessment has been prepared for Members' consideration in the light of the Proposed Modifications to the Plan. This reaffirms the conclusions of the appraisal considered by Council on 9 July 2015 and is available at **Appendix 4**.

## **Risk Assessment**

53. Implementation of the Schedule of Work and subsequently consultation will enable the Examination to be resumed helping deliver a plan led approach to development at Chippenham; enabling the cumulative impact of development to be understood and the holistic planning of the town to take place. Land to deliver new jobs, homes and community facilities can therefore be identified in a way that seeks to minimise impact on the local environment and maximise benefits of development.

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

54. There is a considerable amount of developer interest around Chippenham. This means that the Council is already considering applications on the edge of the town on a case by case basis impacting on the Council's ability to plan

effectively for growth at the town. Implementing the Schedule of Work and concluding the consultation will also help the Council maintain and demonstrate a five year supply of housing land, in accordance with the requirements of the Government's National Planning Policy Framework.

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

55. There remains reputational risk to the Council as criticism may be attracted from local people who do not want to see developments in areas they value. To help manage this risk, a joint briefing for the Chippenham, Calne and Corsham Community Areas is being arranged to allow local people to find out about the outcomes from the work and understand the reasons behind it.

### **Financial Implications**

56. The financial implications for finalising the implementation of the Schedule of Work, consultation and completion of the Examination process will have to be met from the Economic Development and Planning budget provision for 2016/17 respectively. The Inspector has indicated that he may wish to use expert assessors to assist with viability and transport matters, which will have a cost implication.
57. Progression of the Plan will help bring forward new sites for housing, thereby enabling the Council to benefit from the Government's New Homes Bonus and by a contribution to the Council's Council Tax base. In addition, they will be subject to Community Infrastructure Levy that will help deliver specific infrastructure schemes in Chippenham and adjoining parishes.

### **Legal Implications**

58. In accordance with the Planning and Compulsory Purchase Act 2004 (as amended) ('2004 Act'), the Council has a statutory duty to prepare planning policy and maintain up-to-date policy, which is reinforced through the National Planning Policy Framework (NPPF). The NPPF requires Plans to have a proportionate evidence base that is adequate, up to date and relevant (paragraph 158). Implementation of the Schedule of Work has been undertaken in compliance with legislation and National Planning Policy.
59. Legislation relating to the local plan preparation process is set out in the Town and Country Planning (Local Planning) (England) Regulations 2012. According to Regulation 22, a sustainability appraisal report is one of the main documents prepared to support the development of the submitted Plan and involves the assessment of reasonable alternatives. This has been amended and enhanced as referred to in the Schedule of Work.
60. In implementing the Schedule of Work the Council has been mindful of its statutory duties in respect of heritage assets, as set out under Sections 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990.
61. The Inspector, in accordance with the NPPF, is independently examining the Plan for soundness, namely that it is: positively prepared, justified, effective and consistent with national policy (paragraph 182) and considering compliance under Section 20(5) of the

2004 Act. Implementation of the Schedule of Work in response to the Inspector's concerns enables the Council to submit additional evidence and Proposed Modifications to support the progression of the Chippenham Site Allocations Plan through Examination. This work ensures the Plan is sound in accordance with Section 20(5)(b) of the 2004 Act and paragraph 183 of the NPPF.

62. Consistent with the Council's practice for all Local Plan Examinations, the Council has formally requested that the Inspector recommend any necessary modifications to the Plan to make the Plan sound and legally compliant pursuant to section 20 (7C) Planning and Compulsory Purchase Act 2004.

### **Options Considered**

63. Progression of the Plan will help ensure that Core Policy 10 of the Wiltshire Core Strategy is implemented and a clear strategy is in place for plan led growth at the Town, providing certainty for developers and the local community. The Inspector has required that further work be undertaken through the Schedule of Work in order to progress the Examination and that consultation be undertaken on the outcome.

### **Conclusions**

64. Implementing the Schedule of Work in response to the Inspector's concerns enables the Council to submit additional evidence and Proposed Modifications to support the progression of the Chippenham Site Allocations Plan through Examination.
65. Having considered the evidence, the Mixed Strategy is the preferred development strategy and on balance is the most sustainable option for the Plan period, which has just 10 years remaining. The Mixed Strategy can be considered as a first phase of the Submitted Plan Strategy, as it comprises an enlarged South West Chippenham allocation (Policy CH1) and Rawlings Green allocation (Policy CH2).
66. The Proposed Modifications and accompanying evidence arising from implementing the Schedule of Work should be submitted to the Inspector and arrangements made for consultation in order that the hearings can be resumed and Examination progressed.

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Date of Report: April 2016



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**The following unpublished documents have been relied on in the preparation of this Report:**

None

**Appendices:**

Appendix 1: Schedule of Work, 4 December 2015

Appendix 2: Step 8, Extract from Site Selection Report (April 2016)

Appendix 3: List of Proposed Modifications to the 'Pre-Submission Chippenham Site Allocations Plan February 2015' (April 2016)

Appendix 4: Equalities Impact Assessment of the Chippenham Site Allocations Plan (April 2016)

**Documents published with the Agenda:**

1. Pre-Submission Chippenham Site Allocations Plan February 2015
2. Proposed Changes to the 'Pre-Submission Chippenham Site Allocations Plan February 2015' (July 2015)
3. Chippenham Site Allocations Plan: Site Selection Report, April 2016
4. Supplement to Evidence Paper 3: Transport and Accessibility Part 1A - Strategic Site Options
5. Supplement to Evidence Paper 3: Transport and Accessibility Part 2A - Alternative Development Strategies
6. Position Statement: Improving highways network resilience at Chippenham, April 2016
7. Chippenham Strategic Site Viability Assessment, April 2016
8. Chippenham Site Allocations Plan Sustainability Appraisal Report - Part One A - Methodology and Part One B - A Review of the Sustainability Appraisal of Strategic Areas
9. Chippenham Site Allocations Plan Sustainability Appraisal - Addendum 1: SA of Strategic Site Options
10. Chippenham Site Allocations Plan Sustainability Appraisal Addendum 2: Assessment of Alternative Development Strategies

11. Chippenham Site Allocations Plan Sustainability Appraisal - Proposed Changes to Pre-Submission Draft Plan Sustainability Appraisal Note, April 2016
12. Addendum to Evidence Paper 2: Housing and Community Facilities
13. Habitats Regulations Assessment - Update of the Chippenham Site Allocations Plan, April 2016