

1. 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

1.1 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

1.2 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

1.3 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.

1.4 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:

1.5 **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

1.6 **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

1.7 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:

1.8 *“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

- 1.9 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

- 1.10 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.
- 1.11 **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**
- 1.12 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.

- 1.13 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.
- 1.14 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.
- 1.15 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.
- 1.16 ***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***
- 1.17 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.
- 1.18 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.

- 1.19 **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**
- 1.20 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.
- 1.21 Transport evidence indicates that the Eastern Link Road strategy provides greater benefit to the existing community than the Southern Link Road strategy.¹ The Southern Link Road Strategy is predicted to potentially result in some poor traffic impacts in the local network and is therefore a threat.
- 1.22 **4. Improves accessibility by alternatives to the private car to the town centre, railway station, schools and colleges and employment**
- 1.23 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.
- 1.24 Each of the strategies present opportunities under this criterion to improve access to every day destinations by alternatives to the private car.

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

- 1.25 **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**
- 1.26 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.
- 1.27 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.
- 1.28 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.
- 1.29 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.

- 1.30 All the strategies involve possibilities threatening poor impacts on the quality of the landscape, heritage and biodiversity assets.
- 1.31 **6. Avoids all areas of flood risk (therefore within zone 1) and surface water management reduces the risk of flooding elsewhere**
- 1.32 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.
- 1.33 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

- 1.34 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.
- 1.35 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

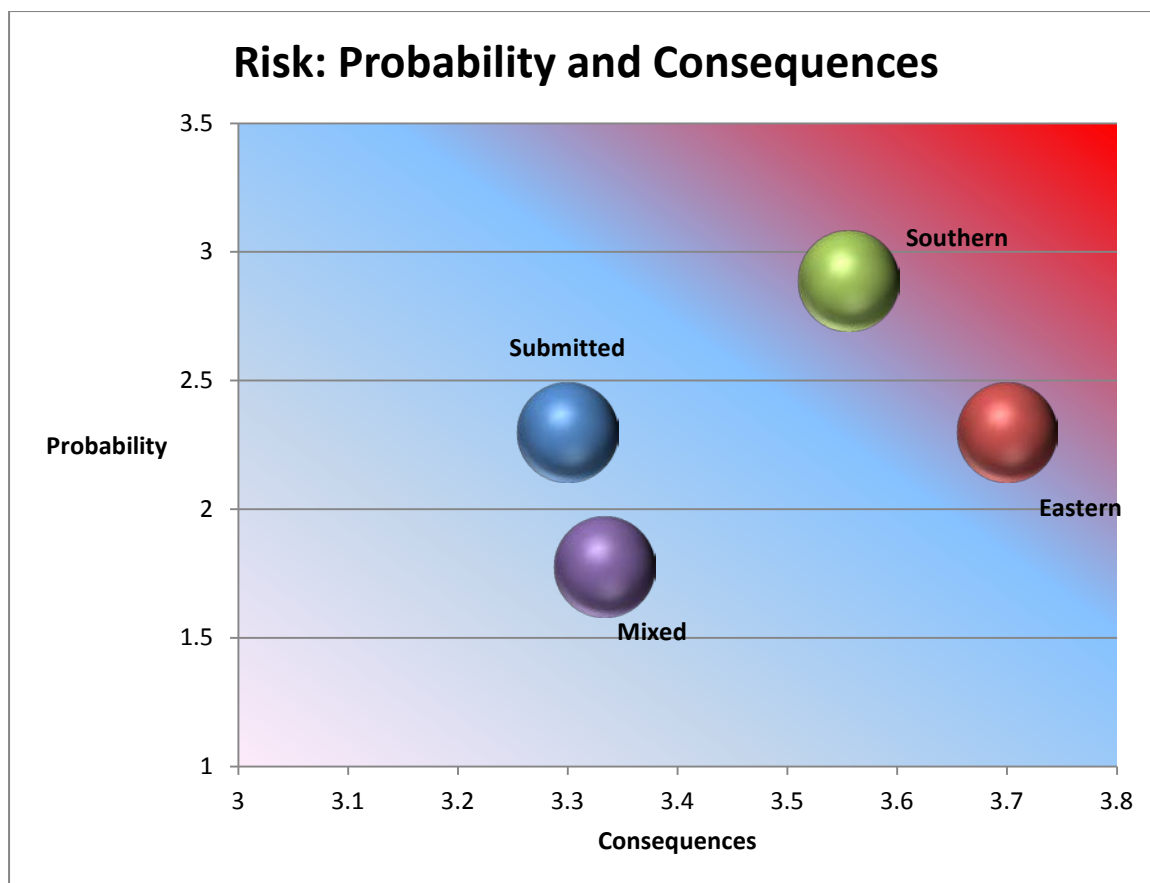
1.36 The submitted strategy along with the mixed strategy has economic growth and greater resilience as a strength (criterion 1). Prospects for economic growth are seen as a weakness of both Eastern and Southern Link Road strategies.

1.37 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.² It states:

1.38 *“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.”*

1.39 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.

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



1.40 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 Strategy³. Again the conclusions are reflected in the discussion below.

Southern link road strategy

1.41 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.

1.42 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.

1.43 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

³ 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 evidence⁴ 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 bypass⁵. 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

- 1.44 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.
- 1.45 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.
- 1.46 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

⁴ Supplementary Evidence to Transport and Accessibility Evidence : Part 2a Assessment of Alternative development Strategies (CEPS/05a)

⁵ Supplementary Evidence to Transport and Accessibility Evidence : Part 2a Assessment of Alternative development Strategies (CEPS/05a)

identified in sustainability appraisal, large commercial buildings are unacceptable⁶. 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**

- 1.47 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 requirement⁷.
- 1.48 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

- 1.49 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:
- 1.50 *'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 alternative⁸'.*
- 1.51 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.
- 1.52 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

⁶ CSUS/11 Draft Revised Sustainability Appraisal Report

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

⁸ CSUS/11 Draft Revised Sustainability Appraisal Report

- 1.53 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 away⁹.
- 1.54 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.
- 1.55 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 site¹⁰. 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 investment¹¹.
- 1.56 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.
- 1.57 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

- 1.58 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

⁹ 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.

¹⁰ Briefing Note 5: Role of Strategic Sites (CEPS/16)

¹¹ Swindon and Wiltshire Economic Plan (CECON/01)

reduce by approximately 13%.¹² 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.

- 1.59 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

- 1.60 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 proposals¹³. NPPF asks Councils to minimise impacts on biodiversity¹⁴. Sustainability appraisal concludes that these impacts will be problematic to mitigate.
- 1.61 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.
- 1.62 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

- 1.63 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.

¹² Supplement to Transport and Accessibility Evidence Paper: Part 2a: Assessment of Alternative Development Strategies Table 4-1, page 23

¹³ Add reference to statement in the SA – awaiting published version

¹⁴ National Planning Policy Framework (NPPF), paragraph 117, DCLG, (March 2012)

- 1.64 The National Planning Policy Framework (NPPF) asks that Councils demonstrate there is five years' supply of deliverable land for house building¹⁵. 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.
- 1.65 The NPPF looks for plans to boost significantly the supply of housing¹⁶. More than half way through the plan period, rates of house building in Chippenham have met less than a quarter of the local requirement¹⁷. 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.
- 1.66 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.
- 1.67 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.
- 1.68 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

¹⁵ National Planning Policy Framework (NPPF), paragraph 47, DCLG, (March 2012)

¹⁶ National Planning Policy Framework (NPPF), paragraph 7, DCLG, (March 2012)

¹⁷ 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.

- 1.69 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.
- 1.70 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 area¹⁸. 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

- 1.71 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.
- 1.72 Viability assessment shows strategic site option E5, E2 and B1 to be viable at target levels of affordable housing provision
- 1.73 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.
- 1.74 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

¹⁸ 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.

- 1.75 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.
- 1.76 Evidence from a viability assessment¹⁹ 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 viable²⁰. 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.
- 1.77 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

- 1.78 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

¹⁹ Chippenham Strategic Site Viability Assessment, BNP Paribas (April 2016)

²⁰ 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.

- 1.79 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.
- 1.80 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	

1.81 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.

1.82 **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.

- 1.83 **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.
- 1.84 **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..
- 1.85 **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.
- 1.86 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:

- 1.87 *‘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’;*
- 1.88 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
- 1.89 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

1.90 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:

1.91 **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

1.92 **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

1.93 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 appraisal²¹ 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

²¹ 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.

- 1.94 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.
- 1.95 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

- 1.96 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

- 1.97 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.
- 1.98 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

- 1.99 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.
- 1.100 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

- 1.101 Viability assessment²² 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.
- 1.102 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.
- 1.103 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

²² Chippenham Strategic Site Viability Assessment, BNP Paribas, (April 2016)

- 1.104 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 Strategy²³.
- 1.105 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.
- 1.106 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

- 1.107 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:
- 1.108 *"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.*
- 1.109 *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.*
- 1.110 *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.*
- 1.111 *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 transport²⁴"*

²³ Wiltshire Core Strategy, paragraph 5.48, Wiltshire Council, (Jan 2015)

²⁴ Chippenham Visioning: ATLAS Report on the visioning event held on 23rd September 2010

- 1.112 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

- 1.113 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.
- 1.114 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.
- 1.115 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.
- 1.116 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.
- 1.117 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.

- 1.118 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.
- 1.119 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.
- 1.120 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.
- 1.121 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

- 1.122 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

- 1.123 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.
- 1.124 The Swindon Wiltshire Local Economic Partnership (LEP) identifies the A350 corridor as a main focus for growth²⁵; 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.
- 1.125 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.
- 1.126 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.
- 1.127 In recent years local economic growth has been stymied by a lack of greenfield sites²⁶. 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

²⁵ 'Aligning Local Innovation With Government Ambition', Strategic Economic Plan, paragraph 4.35, Swindon and Wiltshire Local Enterprise Partnership (Mar 2014)

²⁶ 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

- 1.128 The National Planning Policy Framework looks for plans to boost significantly the supply of housing²⁷. 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.
- 1.129 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.
- 1.130 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.
- 1.131 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.
- 1.132 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.
- 1.133 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.
- 1.134 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.
- 1.135 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

²⁷ 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.

- 1.136 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

- 1.137 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.
- 1.138 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.
- 1.139 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.
- 1.140 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 uses²⁸ 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 sites²⁹. 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

- 1.141 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.

²⁸ National Planning Policy Framework, Glossary, DCLG (Mar 2012) (CNPP/01)

²⁹ Chippenham Site Allocations Plan: Pre-Submission Draft Plan, paragraph 5.14, Wiltshire Council (Feb 2015) (CSAP/01)

- 1.142 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.
- 1.143 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

- 1.144 Traffic modelling evidence has assessed the impact of development proposals without mitigation. Without mitigation congestion in the town centre and elsewhere will increase.
- 1.145 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.
- 1.146 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).
- 1.147 This requirement provides a milestone for the co-ordination of development that require closer collaboration between land owners and prospective land owners.

Delivery

- 1.148 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.
- 1.149 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.

- 1.150 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

- 1.151 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.
- 1.152 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.
- 1.153 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

- 1.154 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.
- 1.155 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.
- 1.156 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.
- 1.157 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.

- 1.158 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.
- 1.159 Key risks around access, identified in the assessment are therefore being tackled directly.

Appendix 8:

SWOT assessment of alternative development strategies

Summary SWOT Assessment (Performance against CP10 Criteria 1-6)

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

Eastern Link Road Alternative Development Strategy SWOT

Step 8 SWOT Assessment (Performance against CP10 criteria 1-6)			
Strength	Opportunity	Threat	Weakness
	3 4 6	2 5	1

CP10 Criteria	
Economy	<p>The Eastern Link Road option has low potential to ensure the delivery of a choice of premises for employment. Whilst both sites are subject to current planning applications, the combined amount of employment land is 15ha, which is below the residual requirement for employment land. Additional land would be required to be provided for employment in C1 instead of housing or elsewhere in Chippenham.</p> <p>Extensive new road infrastructure is required which may have significant cost and time implications for the delivery of both sites. The infrastructure would include a railway bridge to Area A, a river crossing between Site B1 and C4, a Cocklebury Link Road and the production of an Eastern Link Road (ELR).</p> <p>Business premises development could include large buildings and car parking which would be difficult to adequately screen and consequently 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.</p>

Social	<p>The Eastern Link Road option has good social opportunities. The overall amount of housing exceeds the residual requirement and there is potential to provide a mix of house types for both market and affordable housing and to provide facilities such as primary schools.</p> <p>However the provision of a eastern link road could risk the delivery of appropriate levels of affordable housing and could result in issues of viability given the additional cost of the railway bridge, link road and river crossing and delay to delivery of housing linked to the completion of the eastern link road to ameliorate the impact on congested corridors.</p> <p>Site B1 has a strong relationship with the railway station, college and leisure centre and has some potential for providing new attractive walking and cycling links. It is a moderate distance to the railway station for the central and western areas within Site C4. Distance to the railway station for the eastern and northern areas beyond the pylon line and the Sustrans route is further. The Eastern Link Road would improve access to the railway by car and/or public transport.</p> <p>One of the main strengths of this option is the proximity to Abbeyfield School where there is known capacity. Neither site in this option is particularly close to any of the existing GP Surgeries. The current preference is to provide additional capacity at the Community Hospital to relieve pressure on individual GPs which is located to the SW of Chippenham and access is weak from this option.</p> <p>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.</p>
Road Network	<p>The eastern link road option provides the opportunity to create a link road to improve access to the A350 from the east of Chippenham through Strategic Area A and reduce the potential impact of development on existing congested corridors and benefit traffic conditions in the central area.</p> <p>However, the opportunity to provide a link road may be tempered by the delay to development this may introduce ie limited number of homes and jobs created until a new link road is available and, as a consequence the relative benefits of this option in relation to criteria 1 and 2 of CP10.</p>
Accessibility	<p>The Eastern Link Road option has strong opportunities to improve access to key facilities by non-motorised transport. There is good ease of access to the town centre and railway station from Site B1 with opportunities to extend and improve the currently public transport network from Site C4 as a result of the development of an eastern link road.</p>
Environment	<p>The Eastern Link Road option will have moderate-high landscape impact upon the countryside and the settings to Chippenham and surrounding settlements although</p>

	<p>it also provides opportunities to improve biodiversity and access and enjoyment of the countryside.</p> <p>Site B1 has a high visual prominence and the site is likely to be sensitive to encroachment from the town, with development in this area likely to make the urban edge of Chippenham more prominent in the wider landscape. The site has moderate-low development capacity, although the area south of Peckingell Farm is marginally less sensitive. The site consists of improved agricultural grassland with limited ecological value. There is also strong connectivity to public rights of way through and into the countryside with some public views. Potential mitigation measures include a lesser density of development and prevention of intrusive large buildings on the site.</p> <p>Site C4 has several areas which have moderate to low development capacity. These include land south of the North Wiltshire Rivers Route as it is located on higher ground that is more visually prominent, land north of the North Wiltshire Rivers Route to maintain separation between Chippenham and Tytherton Lucas and retain the remote and tranquil area around the River Marden and Land associated with the floodplain of the River Avon. 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. The asset would be affected by loss of appreciation and understanding of the landscape setting and context to these buildings.</p>
<p>Flood Risk</p>	<p>The eastern link road option contains some flood zone 2 and 3 which is part of the River Avon Corridor. However there remains a developable area outside of this area.</p>

Southern Link Road Alternative Development Strategy SWOT

Step 8 SWOT Assessment (Performance against CP10 criteria 1-6)			
Strength	Opportunity	Threat	Weakness
2	4 6	3 5	1

CP10 Criteria	
Economy	<p>The Southern Link Road option has moderate potential to ensure the delivery of a choice of premises for employment. One site is subject to a current planning application, whilst the other site is not being actively promoted. Therefore whilst this option could provide 28ha employment land, currently there is certainty that only 18ha could be provided which is below the residual requirement.</p> <p>The employment land within Site E5 has been identified as being deliverable in the short term for a mix of B1/B2/B8 uses. It is situated at a strategic location away from congested corridors, has a direct link to the A350 and the wider PRN, and does not rely upon significant infrastructure to be in place prior to/during its completion.</p> <p>The economic potential of Site D7 is considered to be weak. Although it can physically accommodate employment land or premises without prejudice to existing residential properties, development of business premises in this area could undermine a number of landscape qualities to be safeguarded and it is likely that the scale of building form and associated infrastructure would have a greater adverse effect on qualities to be safeguarded than housing development. In addition, the site is in a location that would create pressure on existing congested corridors and relies on the provision of a southern link road to improve access to the primary road network and could consequently be subject to high development costs. The site is also considered to be deliverable later or beyond the plan period due to the need for infrastructure to access the site and to provide a suitable link with the A350 and M4 and, as the site is not currently being promoted actively by the land owner there is likely to be a low speed of delivery. The separate ownership of a strip of land alongside the A4 which would control access to the site should be seen as a significant risk to delivery.</p>
Social	<p>The Southern Link Road option has good social opportunities. Altogether the overall amount of housing exceeds the residual requirement and there is potential to provide a mix of house types for both market and affordable housing, although the provision of a southern link road could risk the delivery of appropriate levels of affordable housing.</p> <p>Two further issues which could arise are (i) viability given the additional cost of a link road and river crossing and (ii) delay to delivery of housing which could be linked to the completion of the southern link road to ameliorate the impact on congested corridors. Site D7 is not currently being promoted and combined with</p>

	<p>the need for infrastructure is likely to lead to a low speed of delivery.</p> <p>One of the main strengths of D7 located east of the River Avon is its proximity to Abbeyfield School where there is known capacity and its relationship to Stanley Park, whereas Site E5 located west of the River Avon is further away from Abbeyfield School and which is therefore considered to be a weakness.</p> <p>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. 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.</p> <p>A potential risk for this option is its relationship to both the sewerage treatment works and the water supply, although the extent of these risks is unknown at the moment.</p>
Road Network	<p>The southern link road option provides the opportunity to create a southern link road to improve access to the A350 from the east of Chippenham through Strategic Area E (which already performs well in terms of access to PRN/A350 and town centre) and reduce the potential impact of development on existing congested corridors.</p> <p>However, the opportunity to provide a link road may be tempered by the delay to development this may introduce ie limited number of homes and jobs created until a new link road is available and, as a consequence the relative benefits of the site in relation to criteria 1 and 2 of CP10.</p> <p>Transport evidence indicates that the Eastern Link Road strategy provides greater benefit to the existing community than the Southern Link Road strategy. The Southern Link Road Strategy is predicted to potentially result in some poor traffic impacts in the local network and is therefore a threat.</p>
Accessibility	<p>The Southern Link Road option has moderate opportunities to improve access to key facilities by non-motorised transport. There is good ease of access to the town centre and railway station although there are differences in terms of public transport and access to secondary schools between the east (Site E5) and west (Site D7) part of the option.</p> <p>Site E5 has good access to existing public transport routes and strong opportunity to develop and improve the current public transport network, whereas there are weak opportunities to extend existing public transport routes on the A4 into Site D7.</p> <p>Site D7 has a strong relationship with Abbeyfield School whereas access to secondary schools is a main weakness for Site E5, although there are opportunities to improve the public footpath network in this area which may then open up the possibility of improved links to secondary schools.</p>
Environment	<p>The Southern Link Road option will have some landscape impact upon the countryside and the settings to Chippenham and surrounding settlements, but</p>

	<p>also provides opportunities to improve biodiversity and access and enjoyment of the countryside.</p> <p>The option contains certain features of ecological value such as Mortimores Wood CWS and the River Avon County Wildlife Site as well as the Rowden Conservation Area. There is potential for mitigation in relation to each aspect which means there are areas which have moderate to low development capacity. The capacity to preserve and enhance the landscape characteristics within the site appears to be viable with Rowden Manor and its associated conservation area being conserved, along with the River Avon valley. Scope to preserve the views of the historic core of Chippenham is also possible with the retention of green buffers, which also repair the urban fringes and approaches to Chippenham which are currently rural from the south west.</p> <p>The southern extent of Site E5 means that it encroaches around the Showell Farm nurseries, which has been identified as being a site of archaeological interest. However opportunities exist to mitigate against the loss of these heritage assets and others across the site by recording and preserving them in situ and recording the more widespread interests. Grade II* listed Rowden Manor will remain protected by the conservation area.</p>
<p>Flood Risk</p>	<p>The Southern Link Road Option contains a large amount of developable land within Flood Zone 1. Site D7 located East of the River Avon has a low risk of flooding, although development would be at least partially dependent upon creating crossings to the River Avon in order to ensure proper connections to the town. Site E5 abuts flood risk zones to the east while also including several smaller tributary watercourses draining to the river Avon. This means that a sensible scale and pattern of development would be required along with measures to provide for an acceptable surface water management regime. Some of Site E5 has the highest propensity to groundwater flooding, although much of the affected area is close to the river Avon and as such is on a flood risk area so will not be built on. This may have a bearing on the potential for and design of SUDS.</p>

Submitted Alternative Development Strategy SWOT

Step 8 SWOT Assessment (Performance against CP10 criteria 1-6)			
Strength	Opportunity	Threat	Weakness
2 1	6 4 3	5	

CP10 Criteria	
Economy	<p>The Submitted Option has good potential to ensure the delivery of a choice of premises for employment. The amount of employment land to be provided exceeds the residual requirement and at least 23ha can be provided within the plan period.</p> <p>The employment land within Site E2 has been identified as being deliverable in the short term for a mix of B1/B2/B8 uses. It is being actively promoted by the landowner and subject to a planning application. It is situated at a strategic location away from congested corridors, has a direct link to the A350 and the wider PRN, and does not rely upon significant infrastructure to be in place prior to/during its completion.</p> <p>The B1 site including the employment land 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 rural aspect and views would provide an attractive setting to the development. Although business premises development in this area could include large buildings and car parking which would be difficult to adequately screen and consequently 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.</p> <p>Extensive new road infrastructure would be required if development takes place on sites B1 and C1. The infrastructure would take the form of a railway bridge to Area A, and the production of an Eastern Link Road (ELR). The implementation of this infrastructure could have significant cost and time implications on the delivery of these two sites. The delivery of Site E1 located to the SW of Chippenham would not be affected.</p>
Social	<p>The submitted option has good social opportunities. Altogether the overall amount of housing exceeds the residual requirement and there is potential to provide a mix of house types for both market and affordable housing, although the provision of a eastern link road could risk the delivery of appropriate levels of affordable housing. Two further issues which could arise in relation to Sites B1 and C1 are (i) viability given the additional cost of a link road and river crossing and (ii) delay to delivery of housing which could be linked to the completion of the eastern link road to ameliorate the</p>

	<p>impact on congested corridors.</p> <p>Sites B1 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. Site E2 also has a network of Public rights of way and has potential opportunity for improvements to the public footpath network, with improved links possible with the town centre.</p> <p>B1 and C1 are both relatively close to Abbeyfield Secondary School, where there is current capacity. Neither is close to any of the existing GP Surgeries. Site E2 is further away from Abbeyfield School which is considered to be a weakness, although the opportunities for improvements to the PRow may result in improved links. It is relatively close to the Community Hospital where it is the current preference is to provide additional capacity to relieve pressure on individual GPs.</p> <p>All three sites contain some land classified as floodplain 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.</p> <p>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.</p>
Road Network	<p>The submitted option provides the opportunity to create an eastern link road to improve access to the A350 from the east of Chippenham from the A4 through Sites C1, B1 and strategic Area A and reduce the potential impact of development on existing congested corridors. The opportunity to provide a link road may result in a delay to development on sites B1 and C1. ie limited number of homes and jobs created until a new link road is available. However Site E2 is not reliant on the provision of a eastern link road.</p>
Accessibility	<p>The Submitted option has moderate opportunities to improve access to key facilities by non-motorised transport.</p>
Environment	<p>The submitted option will have some landscape impact upon the countryside and the settings to Chippenham and surrounding settlements, but also provides opportunities to improve biodiversity and access and enjoyment of the countryside.</p> <p>The area of Site B1 has a high visual prominence and the site is likely to be sensitive to encroachment from the town, with development in this area</p>

	<p>likely to make the urban edge of Chippenham more prominent in the wider landscape. As a result the site has moderate-low development capacity.</p> <p>Site E2 has the capacity to preserve and enhance the landscape characteristics within the site by utilising Rowden Manor and its associated conservation, alongside conserving with the River Avon valley. Views of the historic core of Chippenham can be preserved through the retention of green buffers, which also repair the urban fringes and approaches to Chippenham. Through the conservation of the River Avon Valley, railway embankment and the conservation area the impact upon ecological sites and associated species can be minimised. The site extends around the Showell Farm Nurseries, which has been identified as being a site of archaeological interest. Opportunities exist to mitigate against the loss of these heritage assets and others across the site by recording and preserving them in situ and recording the more widespread interests.</p> <p>For Site C1, the area of land in the vicinity of Harden’s Mead is marginally less sensitive for development being located on lower ground next to the eastern edge of Chippenham. The area of land south of the North Wiltshire Rivers Route has been ascribed a moderate-low development capacity as it is located on higher ground that is more visually prominent and the area of land north of the North Wiltshire Rivers Route also has a low development capacity in order to maintain separation between Chippenham and Tytherton Lucas and retain the remote and tranquil area around the River Marden. There are existing views towards Chippenham from Tytherton Lucas, however at present these are glimpsed and generally the village feels rural and remote. Development 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. Development would require extensive advanced landscape structure to reduce adverse landscape and visual effects on the surrounding landscape.</p> <p>The area of land south of Stanley Lane has been ascribed a low development capacity as it is located on the highest ground in Area C and is prominent from view from the surrounding limestone ridge. The land also maintains separation between Chippenham and Derry Hill.</p>
<p>Flood Risk</p>	<p>The submitted option contains some land within Flood Zones 2 and 3 which provides the opportunity for However all three sites which make up this option include developable land within Flood Zone 1.</p>

Mixed Option Alternative Development Strategy SWOT

Step 8 SWOT Assessment (Performance against CP10 criteria 1-6)			
Strength	Opportunity	Threat	Weakness
① ②	③ ④ ⑥	⑤	
CP10 Criteria			
Economy	<p>The Mixed Option has good potential to provide employment land. Over 23ha of employment land can be provided during the plan period which exceeds the residual requirement of 21ha. The employment land is considered to be deliverable for a mix of B1/B2/B8 uses in the early and later stages of the Plan.</p> <p>The employment land within Site E5 is situated at a strategic location away from congested corridors, has a direct link to the A350 and the wider PRN, and does not rely upon significant infrastructure to be in place prior to/during its completion. It has been identified as being deliverable in the short term.</p> <p>Although Site B1 is distant from the economic corridor, its proximity to the town centre and railway station provides a distinctive USP for this location which is also close to the established principal employment area at Langley Park. There is a lack of access to A or B roads to and from this site so extensive new road infrastructure would be required for development to take place on this site. The infrastructure would take the form of a link road from Cocklebury Road across the railway bridge to Area A..The implementation of this infrastructure could have significant cost and time implications on the delivery of the site. However employment land at this site is considered to be deliverable for a mix of B1/B2/B8 uses in the later stages of the Plan provided the Cocklebury Link road is created to open up the land. 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.</p>		
Social	<p>The mixed option has good social opportunities. The overall amount of housing exceeds the residual requirement of 1780 houses and there is potential to provide a mix of house types for both market and affordable housing alongside the infrastructure required to serve them.</p> <p>The strengths of Site B1 are the network of PRoW crossing the site 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. The site is also relatively close to Abbeyfield Secondary School.</p>		

	<p>There are several risks for Site B1. These relate to the potential pollution sources in Langley Park industrial area and the distance to the waste water works, although the extent of these risks is unknown at the moment. Further risks relate to the provision of appropriate levels of affordable housing as the production of a new bridge would have significant cost and time implications on the delivery of the site. Furthermore the site is not close to any of the existing GP Surgeries.</p> <p>The strengths of Site E5 are that 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.. This site is also closely linked with the Rowden Community Hospital. With, this could place this area in a good strategic location in relation to this facility.</p> <p>Furthermore, the size of this site improves the viability in regards to the provision of facilities such as a primary school. Therefore this site could actually have the opportunity to have a positive impact upon Chippenham's Schools and current spare capacity. The larger residential area also lends itself to providing more in the way of leisure provision, hence also opening up opportunities on this front.</p>
Road Network	<p>The Mixed Option by including Site B1 will contribute towards the production of an Eastern Link Road, which could reduce the potential impact of development on existing congested corridors. Site B1 also has strong potential to offer wider transport benefits to the community as it has strong access to the town centre particularly the railway station and through the access road road required to develop the site will remove an existing cul-de-sac along Cocklebury Road which is seen as creating congestion at Station Road. However, the opportunity to provide a link road may be tempered by the delay to development this may introduce i.e. limited number of homes and jobs created until a new link road is available and, as a consequence the relative benefits of the site in relation to criteria 1 and 2 of CP10.</p> <p>Due to its location in regards to the A350 to the south, Site E5 performs well in terms of access to the PRN/A350. E5 also performs well in terms of access to the town centre by non-motorised modes of transport, however the additional development in the southern region of the strategic site means this region is beginning to provide weaker access to the town centre. This larger scale of development in combination with its proximity to the town centre does mean that the site performs weakly in regards to adding to existing traffic passing through the town centre. The sites close links with existing congested corridors means that in order to mitigate against adding to existing problems, it is possible this site will need to be delivered alongside infrastructure that enables a motorised link with the eastern road network. This may pose a significant development cost upon the strategic site, however will also offer up a wider benefit if the opportunity to provide this link is found to be viable for this strategic site.</p>

<p>Accessibility</p>	<p>The Mixed Option has strong/good opportunities to improve access to key facilities by non-motorised transport.</p> <p>Site B1 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.</p> <p>The assessment for Site E5 is more mixed. The ease of access from Site E5 to the town centre, railway station and public transport is assessed as being good overall, although southern sections of the site perform slightly weaker in terms of access to the town centre and associated facilities. Access to the secondary schools of Chippenham is a main weakness. 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. This may then open up the possibility of improved links to Chippenham's existing secondary schools.</p>
<p>Environment</p>	<p>The Mixed Option will have some landscape impact upon the countryside and the settings to Chippenham and surrounding settlements, but also provides opportunities to improve biodiversity and access and enjoyment of the countryside.</p> <p>Site B1 forms the southern part of the strategic area around Rawlings Farm, which generally comprises improved agricultural grassland with limited ecological value. There is also strong connectivity to public rights of way through and into the countryside with some public views and a network of PRoW linking the edge of Chippenham and Langley Burrell to the north of the Great Western Railway with the wider countryside and also to the North Wiltshire Rivers Route. The area has a high visual prominence and the site is likely to be sensitive to encroachment from the town, with development in this area likely to make the urban edge of Chippenham more prominent in the wider landscape. The site has moderate-low development capacity; nevertheless the site area (the area south of Peckingell Farm), is marginally less sensitive. There are also concerns about the potential moderate impact on heritage assets within and adjacent to the site.</p> <p>Site E5 does not extend beyond the existing footprint of Chippenham and the capacity to preserve and enhance the landscape characteristics within the site appears to be viable with Rowden Manor and its associated conservation area being conserved, along with the River Avon valley.</p>

	<p>Scope to preserve the views of the historic core of Chippenham are also possible with the retention of green buffers, which also repair the urban fringes and approaches to Chippenham which are currently rural from the south west. The preservation of ecological sites and associated species appears to be possible on this site through the conservation area, River Avon valley and railway embankment. The preservation of the above also opens up opportunities for Public rights of way and the enhancement of the existing network that runs through the site.</p> <p>The southern extent of the site means that it encroaches around the Showell Farm nurseries, which has been identified as being a site of archaeological interest. However opportunities exist to mitigate against the loss of these heritage assets and others across the site by recording and preserving them in situ and recording the more widespread interests. Rowden Manor will remain protected by the conservation area.</p>
<p>Flood Risk</p>	<p>The Mixed Option contains a large amount of developable land within Flood Zone 1. There is a small amount of flood zone 2 and 3 to the east of Site B1. However, there is a developable area protected from the River Avon and River Marden by being on higher ground. There would be limited fluvial flooding on the western bank side due to the natural lie of the land. Drainage from this area will be directed to the River Avon so the creation of large impervious areas here will lead to additional peak flows joining the river and therefore additional flows arriving at the radial gate weir in Chippenham centre. This would add to high flood risk at the radial gate.</p> <p>The majority of land of Site E5 that lies within flood zone 2&3 is located within the indicative greenspace of the conservation area and land along the River Avon. Tributaries are present running through the area, and as such any development would need to be carefully developed. Also, with the groundwater flooding susceptibility and the fact that runoff goes directly into the Avon and Sewage Treatment works, surface water management would have to mimic or better the current greenfield rates of runoff.</p>