

**RESPONSE TO MATTERS ARISING FROM CABINET 19 JUNE 2012 IN RELATION TO AGENDA ITEM 7: SUBMISSION OF WILTSHIRE CORE STRATEGY**

<b>Documents to be circulated as referred to in draft minute</b>	<b>Response</b>
Details of full representations made by Councillors during the consultation exercise	A schedule of Councillor comments received on the Wiltshire Core Strategy Pre-Submission Document (February 2012) is attached as <b>Appendix 1</b> .
Sustainability Appraisal, which had been updated to highlight new text	<p>The summary of changes proposed to the Sustainability Appraisal Report can be found at <a href="http://cms.wiltshire.gov.uk/documents/s47122/Wiltshire%20Core%20Strategy%20-%20Sustainability%20Appraisal.pdf">http://cms.wiltshire.gov.uk/documents/s47122/Wiltshire%20Core%20Strategy%20-%20Sustainability%20Appraisal.pdf</a></p> <p>The amended Sustainability Appraisal Report and Appendices are available on the committee pages of the web site accompanying the Council Agenda Item 7. The document shows those text changes that had been made in <b>red</b>.</p>
Details of classification of villages as referred to in Topic paper 3.	<p>The Settlement Strategy Topic Paper is available in three volumes at: <a href="http://www.wiltshire.gov.uk/planninganddevelopment/planningpolicy/wiltshirecorestrategy/wiltshirecorestrategypresubmissionconsultation.htm">http://www.wiltshire.gov.uk/planninganddevelopment/planningpolicy/wiltshirecorestrategy/wiltshirecorestrategypresubmissionconsultation.htm</a></p> <p>A summary of the approach to defining villages within the strategy can be found at Appendix 9 to the Wiltshire Core Strategy - Consultation report available at <a href="http://cms.wiltshire.gov.uk/documents/s47121/Wiltshire%20Core%20Strategy%20-%20Consultation%20Document%20-%20Appendices.pdf">http://cms.wiltshire.gov.uk/documents/s47121/Wiltshire%20Core%20Strategy%20-%20Consultation%20Document%20-%20Appendices.pdf</a>. The significant slides are reproduced at <b>Appendix 2</b>.</p>
Revised copy of the plan on page 248 of the Strategy to include the amendment proposed by Natural England (as referenced in the question from Cllr Judy Rooke).	See <b>Appendix 3</b> .
To respond to Cllr Morland's question regarding the accuracy of the summary of comments at paragraph 2.7.17, third bullet point of Appendix 2 to the Cabinet report.	<p>In the interests of presenting an accurate summary of comments made it is suggested that bullet 3 of paragraph 2.7.17 is amended as follows (deleted text shown as strikethrough and new text is underlined) to:</p> <p>A number of comments questioned the consideration given to the impact upon the strategic road network, particularly the A36, of development at Trowbridge. <del>It was stated in the Transport Strategy that increases to the capacity of the Ashton Park junction can be satisfactorily carried out without creating fresh capacity problems at junctions immediately beyond-</del> <u>Consultees consider that it will be impossible to increase the capacity of the junctions serving the strategic site satisfactorily</u></p>

	<p><u>without creating fresh capacity problems at junctions immediately beyond them.</u> It was therefore suggested that the proposals are unsound in their present form and need to be reduced in scale to reflect the existing and proposed highways infrastructure capacity. <i>Trowbridge Transport Strategy work is ongoing and will include considering mitigation measures and improvements beyond the strategic site.</i></p>
<b>Other matters to be addressed</b>	<b>Response</b>
<p>In response to the letter from Hallam Land Management a change to Appendix 2 of the Council report has been suggested.</p>	<p>Insert new text to the 'changes not made' report at Appendix 2 of the Council papers and Appendix 13 of the Consultation Methodology Output Report.</p> <p>Add the following text to the 'Melksham' section of the report (paragraph 2.7.9):</p> <p><i>"It was suggested that land south of Western Way should be allocated for 7ha of mixed use employment land. It is considered that Melksham should provide 6 ha employment land over the core strategy period, as set out in Topic Paper 7: Economy. It is proposed that the West Wiltshire District Plan allocation at Hampton Business Park should be saved, and that this could provide up to 6 ha employment land. If appropriate, additional employment land at Melksham could be identified through a future planning policy document such as a neighbourhood plan. Alternatively, suitable sites could come forward where these accord with Core Policy 34: Additional Employment Land."</i></p>
<p>A request was made to see all comments submitted in relation to Hunters Moon, Chippenham in response to the Environment Select Committee meeting.</p>	<p>Comments relating to Hunters Moon submitted during consultation on the Wiltshire Core Strategy Consultation Document (June 2011) are attached in the schedule at <b>Appendix 4</b>.</p> <p>Comments relating to Hunters Moon, Chippenham, submitted during consultation on the Wiltshire Core Strategy Pre-Submission Document (February 2012) are attached in the schedule at <b>Appendix 5</b>.</p>

**SCHEDULE OF COUNCILLOR COMMENTS SUBMITTED ON THE WILTSHIRE CORE STRATEGY PRE-SUBMISSION DOCUMENT CONSULTATION**

The following records have been extracted from the on-line data base, which contains a record of all comments received. The schedule shows those entries where the consultee has identified themselves as a Wiltshire Councillor.

Councillor	Core Strategy Reference	Comment
Cllr Steve Oldrieve	<p>The spatial vision for Wiltshire 9</p> <p>Paragraph 3.4 &amp; 3.5</p>	<p><b>Reasons for not sound</b>                      The Core Strategy is not sound as it is not fully effective as it does not emphasise the need for higher education provision including the 16+ age group and the need to provide higher education to match the target sectors. This appears to all be evidenced through Topic Paper 7 Economy but has not been bought out within the Core Strategy itself.</p> <p>SO2 makes not explicit aim of reducing the carbon footprint. I believe it should be included.</p> <p><b>What change(s) are necessary to make the DPD sound?</b>                      Proposed the following wording should be added to the key outcome under Strategic objective 1: Delivering a thriving economy (para 3.4) which would make the WCS sound as it would take account more fully of the evidence.                      'The provision of 16 + education including higher education will have been enhanced especially to provide trained employees necessary to deliver economic growth from our target sectors'.</p>
Cllr Steve Oldrieve	<p>Trowbridge Area Strategy 130</p> <p>Paragraph 5.145</p>	<p><b>Other comments</b></p> <ol style="list-style-type: none"> <li>1. Clause 5.125, p138: The statement is un-sound it does not adequately identify the aspirations for the Town (I believe it should include terms such as a vision for a vibrant principle settlement of choice, providing a beacon for sustainable living.</li> <li>2. Trowbridge needs trees. Need to ensure future land use can support this.</li> <li>3. There is insufficient emphasis on giving priority to brown field sites ,which leaves vulnerable to a redundant and crumbling town centre.</li> <li>4. More proactive approach needed to stop heavy goods vehicle using Trowbridge as a route to M4.</li> </ol>
Cllr Steve Oldrieve	<p>Core Policy 41: Sustainable construction and low carbon energy</p>	<p><b>Reasons for not sound</b>                      CP41 uses the term 'encourage' to direct design measures to reduce energy demand. I believe this is too weak and needs to be strengthened if we are to effectively support Wiltshire Council targets.</p>
Councillor Chris Caswill	<p>Core Policy 2: Delivery strategy</p>	<p><b>Other comments</b></p> <p>In respect of Core Policy 2, I continue to argue that the housing numbers for Wiltshire as a whole and Chippenham in particular, are too high, and based on shaky demographic and population movement assumptions.</p> <p>I continue to believe that the proposals in CP 2 and CP10 for the Rawlings Farm area north of Monkton Park are unsound. As is clear from the response to this consultation, this proposal is not supported by the local community. Here I fully endorse the detailed response of the Monkton Park Group.</p> <p>I wish to highlight three main reasons for the proposals not being sound:</p>

Councillor	Core Strategy Reference	Comment
		<p>- the lack of consideration of the impact of an exit from the site to the south, along Cocklebury Road and Station Hill. This would bring traffic chaos. In the spirit of Localism, particular attention should be given on this point to the strongly expressed views of local residents.</p> <p>- the environmental loss and damage, clearly spelt out in the Monkton Park Group evidence</p> <p>- the existence of site at Hunters Moon, to which there have been very few objections, which already has access to a road, and where environmental damage will be less (no flood risk and no damage to a river corridor). I understand the relevant developer is ready to move on this site, which thus qualifies as deliverable.</p> <p>My proposal is to replace the Rawlings Farm site with a Strategic allocation to Hunters Moon.</p> <p>I continue to assert that the exclusion of possible development of land at the M4 Junction 17 from CP 2 and the Chippenham Strategy is perverse. We have had evidence that it has been seriously considered by the Council Cabinet and it should be included, thereby reducing pressure on Chippenham green space.</p>
Councillor Chris Caswill	Core Policy 10 The Spatial Strategy: Chippenham Community Area 45	<p><b>Reasons for not sound</b></p> <p>I strongly support the proposal not to include the land to the East, across the River Avon, as a Strategic Site for housing. I wish to endorse fully the submission made in this respect by the East Chippenham Open Space Group (ECOS). As I have argued before, there are several weighty objections to any building in this area. It would first of all create a separate dormitory area, with easy access to the proposed distributor / ring road and very troubled access to the town centre - either via the already congested Cocklebury Road &amp; Station Hill route or by another river bridge and access road. I have seen a proposal to bring a road up to Long Close, which seems to me to be at best costly and ill considered. Secondly the associated ring road would be very expensive (£10 million at least has been quoted) and undeliverable without a much larger number of houses than even the Core Strategy proposes.</p> <p>The current draft also understates the environmental impact of large scale housing in this area. ECOS proposes that this be made much clearer in the final version, both in the appendices and in the main document. The loss of valuable agricultural land would be catastrophic, as would be the detrimental impact on the vital living landscape corridor between Chippenham and Calne and the surrounding villages.</p> <p>The Avon and Marden river valleys may not be designated as an Area of Outstanding Natural Beauty but it is "our" AONB as far as the residents of Chippenham and surrounding villages are concerned. Already there are attractive river walks and Route 403 - a national cycle route - takes advantage of the disused Chippenham to Calne railway bed. It is possible to walk and cycle from the Town Bridge in Chippenham to Castlefields in Calne without ever passing between two buildings and at the same time enjoy the landscape and natural environment of the river valleys and the views to Lyneham Banks, Cherhill and Derry Hill.</p> <p>The final version of the Core Strategy should also recognise that any development East of Chippenham will bring a significant threat of flooding by the Avon and Marden. This area is a flood plain. With climate change bringing longer dry spells followed by torrential rain, the destruction of the "sponge" of the farmland could seriously threaten the lower slopes of the town and the villages to the north and east of Chippenham. In this context, I support the NPPF Technical Guidance on Flood Risk, which recommends a Sequential Test approach, diverting built environment away from Flood Zones at moderate and significant risk.</p> <p>Furthermore I join with ECOS in its Local Green Space proposals, which would take forward the Government policy proposals for sustainable development within 'planetary environmental limits'. We foresee an environmentally positive approach to the land East of Chippenham, with its capacity for significant mitigation of CO2 and flooding through woodland planting. All of which would not only be lost but reversed by housing development in this vital green space.</p> <p>I continue to believe that the proposals in CP 2 and CP10 for the Rawlings Farm area north of Monkton Park are unsound. As is clear from the response to this consultation, this proposal is not supported by the local community. Here I fully endorse the detailed response of the Monkton Park Group.</p> <p>I wish to highlight three main reasons for the proposals not being sound:</p> <p>- the lack of consideration of the impact of an exit from the site to the south, along Cocklebury Road and Station Hill. This would</p>

Councillor	Core Strategy Reference	Comment
		<p>bring traffic chaos. In the spirit of Localism, particular attention should be given on this point to the strongly expressed views of local residents.</p> <ul style="list-style-type: none"> <li>- the environmental loss and damage, clearly spelt out in the Monkton Park Group evidence</li> <li>- the existence of site at Hunters Moon, to which there have been very few objections, which already has access to a road, and where environmental damage will be less (no flood risk and no damage to a river corridor). I understand the relevant developer is ready to move on this site, which thus qualifies as deliverable.</li> </ul> <p>My proposal is to replace the Rawlings Farm site with a Strategic allocation to Hunters Moon.</p> <p>I continue to assert that the exclusion of possible development of land at the M4 Junction 17 from CP 2 and the Chippenham Strategy is perverse. We have had evidence that it has been seriously considered by the Council Cabinet and it should be included, thereby reducing pressure on Chippenham green space.</p>
Councillor Judy Rooke	Core Policy 9 Chippenham Central Areas of Opportunity 43 Paragraph 5.47	<p><b>Reasons for not sound</b></p> <p>At para 5.47 it states 'the limited opportunities for the development of brown field sites in Chippenham means that it is necessary to identify green field sites on the edge of town'. This seems to be at odds with the fact that there is a huge expanse of brown field area known as Langley Park, close to the town centre, which is not being used to its full potential. Also the Strategic Housing Land Availability Assessment made it clear that there were brown field sites in Chippenham that could accommodate housing, a potential of 545 houses.</p> <p>The National Planning Policy Framework of March 2012 states as one of the 12 core planning principles - encourage the effective use of land by reusing land that has been previously developed (brownfield) provided that it is not of high environmental value.</p> <p><b>What change(s) are necessary to make the DPD sound?</b></p> <p>Wiltshire Council should be highlighting these brown field sites in Chippenham and working with the landowner/ developers so that less houses need to be built on green field sites. In other words following the core planning principle highlighted above in the National Planning Policy Framework.</p>
Councillor Nigel Carter	Devizes Area Strategy 54 Policy Paragraph 5.63	<p><b>Reasons for not sound</b></p> <p>The statement here speaks only to private sector and retail opportunities in employment. A significant part of the employment in the area is offered by Wiltshire Council, the Wiltshire Constabulary (County HQ), the Fire Service (Potterne, County HQ) and the PCT (Pans Lane). Changes within these organisations would have a significant effect on employment opportunities and affect service companies supporting them.</p> <p><b>What change(s) are necessary to make the DPD sound?</b></p> <p>The text should recognise the dependence on the public sector and how changes to the various bodies could adversely affect the community's well-being.</p>
Councillor Nigel Carter	Devizes Area Strategy 54 Policy 5.65	<p><b>Reasons for not sound</b></p> <p>the text discusses here and elsewhere the Devizes Transport Strategy, Nowhere is there any statement discussing its availability. In the context of the protestations about the congestion in Devizes any such plan is vital and its lack of availability inhibits objective consideration at planning hearings.</p> <p><b>What change(s) are necessary to make the DPD sound?</b></p> <p>advise on the potential availability of this document</p>
Councillor Nigel Carter	Devizes Area Strategy 54 Core Policy 12	<p><b>Reasons for not sound</b></p> <p>The narrative is mis-leading in not stating clearly the level of achievement towards the 2006-2026 targets - something only casually revealed on close scrutiny of the table below. It therefore gives a wrong impression to new readers and does not support/promote the ambition stated elsewhere for a more considered approach to development in the town because of this early</p>

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		<p>achievement and the potential over-development that already exists.</p> <p><b>What change(s) are necessary to make the DPD sound?</b></p> <p>The narrative needs amending to identify the overwhelming progress towards the 2026 target and makes clear the anxiety over existing overdevelopment and the pressure on the infrastructure</p>
Councillor Nigel Carter	<p>Devizes Area Strategy 5 4 Paragraph 5.65</p>	<p><b>Reasons for not sound</b></p> <p>The issue of congestion in Devizes is a serious one and the ultimate ambition for a relief road should not be ignored. However, in keeping otpiosn open for this, road alignments need to be preserved and no mention is made of this. Also, the Wiltshire Old People's Accommodation Strategy (WOPAS) promotes the concentration of care facilities for extra-care, dementia and Alzheimer's patients in the town, yet no mention is made in the structural needs for critical and diagnostic services in the community. This is unhelpful in identifying cross-cutting policy requiremetns and frustrates propeor dialogie on S106/CIL funding with private developers promoting accommodation for th elederly in the town.</p> <p><b>What change(s) are necessary to make the DPD sound?</b></p> <p>enter text which includes ' .. and appropriate road alignments should be preserved', and: enter text which includes 'The choice of Devizes as a centre of excellnece in the provision of car for the elderly requires the provision of and support for suitable critical care and diagnostic hospital services</p>
Councillor Nigel Carter	<p>Core Policy 46: Meeting the needs of Wiltshire's vulnerable and older people</p>	<p><b>Reasons for not sound</b></p> <p>The policy makes no mention of the Wiltshore Old People's Accomodation Strategy. The existence of this strategy is a cross-cutting issue worthy of mention in discussing the develoment of residential homes, particularly those geenrated by the private sector and goves a lie to where the council is emphasising the need for the appripriate facilities.</p> <p><b>What change(s) are necessary to make the DPD sound?</b></p> <p>Insert reference to the Wiltshire Old People's Accommodation Strategy</p>
Councillor Nigel Carter	<p>Appendix D: Saved policies and policies replaced</p>	<p><b>Reasons for not sound</b></p> <p>Policy HC2 identified the Devizes Hospital site as a potential resdiential development. The most recent thinking by the health authorities suggests that the site wil now be retained and provided with update diagnostic facilities. It would, therefore, seem appropriate to dismiss this site from consideration during the next plan period. Alternatively, with the provision of a replacement school for St Peter's Junior Schoool, this site on Bath Road now comes forward as a potential development site.</p> <p>Policies ED21 and 22 are to be overtaken imminently by the new Planning Brief for Devizes Wharf.</p> <p><b>What change(s) are necessary to make the DPD sound?</b></p> <p>Amend the annex to represetn current realities. Ensure that the plan identifies the proposed new brief.</p>
Cllr Jonathon Seed	<p>Core Policy 15 Spatial Strategy: Melksham Community Area 74</p>	<p><b>Other comments</b></p> <p>That the settlement of Great Hinton be retained as a small village That the settlement of Seend Cleeve remain within the Settlement of Seend. Both of the latter have the strong support of the residents and Parish Councils and I will supply further evidence in due course to support all three points.</p>
Cllr Jonathon Seed	<p>Core Policy 42: Standalone renewable</p>	<p><b>Other comments</b></p> <p>That an amendment is made to determine that Onshore Wind Turbines may not be developed within 2000m of an occupied dwelling.</p>

Councillor	Core Strategy Reference	Comment
	energy installations 18	
Councillor Ian McLennan	Salisbury Area Strategy 7 Paragraph 5.109	<p><b>Reasons for not legally compliant</b>  Par 5.109 bullet 4.  My first statement First, the continuing ‘convenient’ stance of Wiltshire’s Spatial Planners to incorporate the rural parish of Laverstock &amp; Ford into its allocations for Salisbury Community Area is unwelcome by all the residents of Laverstock &amp; Ford Parish which is located within the Southern Community Area and not Salisbury. All Wiltshire statistics are recorded and used to deliver services and raise issues, from this base. This has been continually raised by me and by the Parish Council, as from a planning perspective, the parish residents may gain by accepting sites for development, not least by having the future housing needs of their family met and so retaining a place in the parish settlements. By the convenient ignoring of the community area boundary, the planners not only assume they can allocate as though all our farm fields are just urban spaces but also deprive our residents of any rights to any of these newly allocated housing sites in our parish.  Page 106 demonstrates the education needs of Salisbury by stating that Longhedge and Hampton Park will require new schools. Hampton Park and Longhedge are both in Laverstock &amp; Ford Parish.  The map on Page 107 showing Salisbury also includes the whole area of Hampton Park and its Farm and Nature reserve/Rural Country Park element, which is geographically, totally within Laverstock &amp; Ford parish. It also shows, in the north east, the Old sarum and Longhedge existing and newly proposed employment and housing. Again, all within L&amp;F parish and outside of the Salisbury boundary and statistical covered by Southern Area Community. If the statistics for Southern area include L&amp;F parish, then any housing allocations should be used to satisfy those needs or be treated as an unsound basis for allocation.</p>
Councillor Ian McLennan	Core Policy 20 Spatial Strategy: Salisbury Community Area	<p><b>Reasons for not legally compliant</b>  In addition to these allocation for Salisbury rather than Southern area or to meet future parish needs, Old Sarum also carries an allocation of 674 new dwellings and several more hectares of employment land. To say the least, this is over burdening one rural parish and in terms of ‘planning’, should be seen as no more than bullying, given the total ignoring of all attempts to negotiate, by the parish council.  Page 110 clearly shows two boxes containing Longhedge 450 Houses and 8 hectares employment. The more southerly of the allocations is Hampton Park and 500 dwellings within the strategic gap separating Ford and Hampton Park, both within the parish of Laverstock &amp; Ford.</p>
Councillor Ian McLennan	Core Policy 23 Old Sarum Airfield	<p><b>Reasons for not legally compliant</b>  I have had sight of the Laverstock &amp; Ford Parish Council statement to the consultation and wish to acknowledge the accuracy of its content and to add some additional comment to the issues arising from the totally flawed and unsound policy.  As they state, I have a long history having been elected to Salisbury District Council in 1995 and have been continuously elected since and am now the Wiltshire Council member for the area.  During my first term, an Old sarum Flying Forum was set up between the council and the airfield. It addresses complaints and the discussions seek to solve the problems as they arise. I must say that the flying club has done many things to alter the circuits to avoid any houses and also tried differing take off and landing procedures to eliminate flyers using buildings as a marker and so causing them unwanted noise as planes take off or land. We used to meet quarterly, followed by half yearly. Following many successes, an annual meeting is all that is required as complaints are minimal and virtually always unrelated to planes from Old Sarum.</p>

Councillor	Core Strategy Reference	Comment
		<p>It is true to say that there is just one or two individuals who seem to wish to close the airfield. One of these has, I am informed, left the area anyway. I do know that when the Conservation Area was consulted upon, one of these individuals started a campaign of misinformation and that non-local residents signed the petition in fear of Heathrow descending upon them!</p> <p>I can confirm that I have never had a complaint in all my years, from residents in the parish of Laverstock &amp; Ford, where the airfield is situated.</p> <p>In the original consultation for designing our places of the future, Ford was singled out as being a small rural settlement which should be left without alteration and whose residents do not wish to have any infrastructure. This was fine until Wiltshire Spatial Planners took over.</p> <p>Believe the Laverstock &amp; Ford submission, it is true. The treatment of the parish is nothing short of bullying by remote persons and different to the negotiations entered into with the local planners, until the change of council, when every understanding went out of the window.</p> <p>I was the one councillor to vote against the South Wiltshire Core Strategy, based on the treatment of my parish. Nothing has changed here.</p> <p>Also, the failure to address development in rural communities and omitting the fact that high speed broadband is the modern sustainability ingredient rather than a post office...which few now have, is another test of unsoundness.</p>
Cllr J Knight	Core Policy 28 Trowbridge Central Areas of Opportunity	<p><b>Other comments</b></p> <p>Further to our meeting on 23rd February 2012 at the Melksham Office regarding the above, I wish to confirm the contents of our discussion on the day.</p> <p>As the local unitary member for Trowbridge Central Division, I am concerned about the proposals for the Trowbridge Area Strategy and specifically how it would affect the "Former Bowyer's Site, as detailed on page 144 item 2a. - Namely that it be allocated for "Professional and High Density Housing".</p> <p>I would suggest that this site's suitability for housing is somewhat compromised by Core Policy 56 (on page 220 re: "Contaminated Land") due to the level of remediation that would be required, as a result of the site's industrial heritage and further, that the town already has a surfeit of vacant commercial office space and that using one of Trowbridge's key regeneration sites so close to the town for residential and professional business uses would be a missed opportunity.</p> <p>The Bowyer's site is ideally located for retail and leisure uses and being so close to the Primary Shopping Area and with excellent rail and pedestrian links, it has the potential to drive even more footfall into Trowbridge Town Centre.</p> <p>Allocating this site for residential and office use would be somewhat limiting and a missed opportunity for the town and its residents and therefore should be changed accordingly to suit our real needs in this area.</p> <p>I note from the submissions tendered to you by the Town Council, T.C.A.F. Transforming Trowbridge and the Trowbridge County Town Initiative Board, that none seem to oppose the development of a supermarket on this site. However, all seem to dismiss any additional use for leisure purposes and promote the remaining use for "Professional and High Density Housing" which I consider unsustainable, for the above reasons.</p> <p>Finally, I think that the area described as the "Town Centre" needs to be properly defined. Taking the Old Town Hall as the inner centre, one should form a circle encompassing the Railway Station, along Bythesea Road, County Way (north) to the Halve, embracing the new Sainsbury Store and back round to the Railway Station.</p> <p>Everything within this circle should be considered "Town Centre" and hopefully the emerging Trowbridge Town Centre Masterplan will deliver this.</p>



Councillor	Core Strategy Reference	Comment
Cllr Richard Gamble	Corsham Area Strategy 49 Paragraph 5.59	<p><b>Other comments</b></p> <p>Core Policy 66 states that the development/improvement of Corsham station will be promoted and encouraged. These references are consistent and I support them.</p> <p>“Rebuilding” may be a more accurate word than “re-opening” as there are no historic structures remaining. The station site is unlikely to be exactly on the footprint of the former structure, but would probably be very close.</p> <p>The prospects for development of Corsham Station would depend upon the agreement of a train operating company to provide suitable stopping services, which do not exist at present but may be provided by a future Great Western franchise holder or other train operating company. Such a service could probably only be provided post electrification of the line.</p>
Cllr Richard Gamble	Devizes Area Strategy 54 Paragraph 5.65	<p><b>Other comments</b></p> <p>The Devizes Area Strategy (para 5.65) refers to the “long term aspiration in the Devizes Community Area to secure a railway station to serve the town. Locations at Lavington or Lydeaway have been suggested. Opportunities to develop a strategy for rail access to Devizes should be explored during the plan period.”</p> <p>There is no reference to Devizes in Core Policy 66.</p> <p>The policy statement and the area strategy are inconsistent. The area strategy is poorly worded.</p> <p>The meaning of para 5.65 is unclear in several respects.</p> <p>Does “long term” mean the aspiration is long standing or does it mean it looks towards the long term future? If the latter, on what grounds is the future longer for Devizes than, say Royal Wootton Bassett or Corsham? The prospect of a rail service suitable to stop at such a station is at least as good as for the stations on the main line (probably better, as such a service could be provided now, whereas the main line services are dependent upon electrification). Further, the open nature of the Lydeaway site would make construction cheaper and easier.</p> <p>Does “a strategy for rail access to Devizes” refer to building a station? It could also mean re-opening the old branch line to the town (which is inconceivable) or to a strategy for transport links between the town and a station.</p>
Cllr Richard Gamble	Melksham Area Strategy 72 Paragraph 5.80	<p><b>Other comments</b></p> <p>The Melksham Area Strategy (para 5.80) refers to “improving the railway station and examining whether the frequency of rail services could be increased”</p> <p>Core Policy 66 states that the development/improvement of Melksham Station station will be promoted and encouraged.</p> <p>The policy statement and the area strategy are consistent, but poorly worded.</p> <p>Improvement of the railway station is conditional upon an improved frequency of rail services. If there is no increase in frequency (currently two trains each way per day), then no improvement of the station could be justified.</p> <p>The Council has already examined the possibilities for increasing the frequency of train services. Current rail infrastructure permits a two-hourly service and relatively minor improvements to signaling would permit an hourly service on the line. The issue is whether a train operating company is willing to provide such services, or should be required to do so under a future Great Western franchise.</p>
Cllr Richard Gamble	Royal Wootton Bassett and Cricklade Area Strategy 91	<p><b>Other comments</b></p> <p>Neither The Royal Wootton Bassett and Cricklade Area Strategy nor Core Policy 66 refer to a railway station at Moredon Bridge. However, the Area Strategy (para 5.99) says “the proposed route of the Swindon and Cricklade railway line will be protected from development between Moredon Hill to Moredon Bridge Junction and the Swindon and Gloucester railway line”</p> <p>The policy statement and the area strategy are deficient and inconsistent.</p> <p>Network Rail has made “passive provision” for a railway station at Moredon Bridge as part of the programme that is dualling the Swindon and Gloucester line. It is evident that no detailed proposals exist for a station but the NR provision is site-specific so if the site is otherwise developed, then the possibility of providing a station in this area will be lost. I understand that the Swindon and Cricklade railway group would like such a station to serve both the main line and the heritage line so that passengers may</p>

Councillor	Core Strategy Reference	Comment
		<p>thus gain access to the heritage line.</p> <p><b>Other comments</b>  The Royal Wootton Bassett and Cricklade Area Strategy contains no reference to a railway station at RWB. Core Policy 66 states that the development of Royal Wootton Bassett station will be promoted and encouraged. The policy statement and the area strategy are inconsistent.</p> <p>There is an old station site at Royal Wootton Bassett but, from my point of view and, I believe, that of the Town Council and of potential train operating companies, a station would be better sited adjacent to the Interface Industrial Estate. Such detail should be the subject of the Neighbourhood Plan (and would require consultation with Network Rail, future Great Western franchise holders, other TOCs as necessary, etc., as well as the community). Like Corsham, any development will be conditional upon the agreement of a train operating company to provide suitable stopping services, which do not exist at present. Although, unlike Corsham, a future service on the Trans Wilts line could stop at a RWB station irrespective of electrification, it is unlikely the station could be justified on the strength of TWR services alone.</p>
Cllr Richard Gamble	Wilton Area Strategy	<p><b>Other comments</b>  Neither The Wilton Area Strategy nor Core Policy 66 refer to a railway station at Wilton. The policy statement and the area strategy are deficient.</p> <p>I am aware of a continuing interest in Wilton regarding the provision of a station. Although the town is not far from Salisbury station, access is difficult by bus or by car. Some residents and councilors in Salisbury have also asked for consideration of halts at this site and park and ride sites to permit shuttle services into the city. Although this is, in my view, unlikely as current rail developments go, it is not inconceivable some years ahead.</p>
Cllr Richard Gamble	Core Policy 66: Strategic transport network	<p><b>Other comments</b>  The drafters of the Core Strategy should be aware that Wiltshire Council's response to the DfT's consultation on the Great Western franchise, submitted on 26<sup>th</sup> March 2012, states:</p> <p>“During the currency of the new franchise the council would wish to see the franchisee assisting with the assessment of new station proposals and progressing suitable cases through to implementation. A number of proposals exist within the council's spatial strategy or local transport plan, while others are emerging as a result of developing circumstances. These include:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Corsham</li> <li><input type="checkbox"/> Devizes (Lydneyway)</li> <li><input type="checkbox"/> Moredon Bridge (in conjunction with Swindon BC)</li> <li><input type="checkbox"/> Wilton</li> <li><input type="checkbox"/> Royal Wootton Bassett”</li> </ul> <p>I suggest the document is redrafted on the following lines:  Each Area Strategy mentioned above includes reference to the aspiration for the development or improvement of railway stations (See comments ID 1835-1840).  Core Strategy 66 refers only to the development and/or improvement of railway stations “wherever possible and appropriate in accordance with the Area Strategies”. I see no reason why specific reference should be made in Core Policy 66 if reference is already made in the Area Strategy.</p> <p>For consistency, I also hold this view regarding reference to highway improvements at Yarnbrook. In my view, specific should be included only in the Trowbridge Area Strategy (which already includes reference to the Hilperton Relief Road, not mentioned in Core Policy 66, and to “significant and focused road infrastructure improvements to the A350). There are many other potential road improvements that could be delivered during the plan period and it is inappropriate in Clause 66 to mention only one.</p>

Councillor	Core Strategy Reference	Comment
Cllr Francis Morland	Core Policy 44 : Rural exceptions policy	I wish to register my objection to the Cross-subsidy part of Core Policy 44 and to the associated text in all the consultation documents, on the grounds that it will be exploited by property owners and developers to build top-of-the-market houses in the countryside, which are entirely unsustainable and have hitherto been strictly prohibited in the development plan (for West Wiltshire at least).
Cllr Francis Morland	Core Policy 29: Trowbridge Community Area	<p>Core Policy 29 - Spatial Strategy: Trowbridge Community Area on page 149 of that document allocates 25 ha of employment land over the plan period (2006 to 2026), of which 10 ha is described as West Ashton Road Saved West Wiltshire District Plan Allocation.</p> <p>The West Wiltshire District Plan First Alteration was adopted in June 2004, and on page 68 of that document under the heading New Employment Land Allocations allocated (as defined on the Proposals Map) four sites for employment purposes, including as Policy E1A: Trowbridge - 12.1 hectares (30 acres) north of West Ashton Road. By a Direction issued by the Secretary of State on 26 September 2007, most policies contained in the West Wiltshire District Plan First Alteration 2004, including Policy No. E1 (New employment land allocations) were "saved".</p> <p>The effect of Core Policy 29 of the Wiltshire Core Strategy is therefore to reduce the future area of the employment land allocation north of West Ashton Road from 12.1 hectares to 10 hectares.</p> <p>This is a change of circumstances since outline planning permission for the site was last granted on 07 June 2005 (under reference 05/00744/FUL) which will need to be taken into account in determining the current appeal.</p>
Cllr Francis Morland	Trowbridge Transport Strategy	<p>In preparation for the statutory consultation on the Pre-Submission Draft Wiltshire Core Strategy DPD Submission Document January 2012, Wiltshire Council has recently published the Trowbridge Transport Strategy Development - Options Assessment Report - December 2011, which I attach herewith. Its URL is:</p> <p><a href="http://www.wiltshire.gov.uk/planning-policy-trowbridge-strategy-development-options-assessment-report.pdf">http://www.wiltshire.gov.uk/planning-policy-trowbridge-strategy-development-options-assessment-report.pdf</a></p> <p>At Appendix C on page 62 are the Ashton Park Access Proposals, and at Appendix D on pages 63 to 80 are the Model Results Output. The 2026 Do Nothing Output (Figures D.1 and D.2 on pages 63 and 64) show most of the junctions serving the appeal site in red, indicating that they will then be at &gt;85% of capacity. Furthermore, the other figures in Appendix D appear to indicate that it is impossible to increase the capacity of these junctions satisfactorily without creating fresh capacity problems at junctions immediately beyond them. The conclusion I draw is that the Wiltshire Core Strategy proposals for Trowbridge (including those for the appeal site) are fundamentally unsound in their present form and need to be very significantly reduced in scale to reflect what the existing and proposed highways infrastructure in and around the town is capable of servicing satisfactorily.</p> <p>Sadly, there appears to be no-one in Wiltshire Council willing to face up to these issues, and all involved, both in the development control service and in the spatial planning service, seem to think that by simply ignoring them, they will go away.</p>
Cllr Francis Morland	Core Policy 47: Meeting the needs of	Core Policy 31 - Meeting the needs of Gypsies and Travellers - on page 137 of the Wiltshire Core Strategy Consultation Document (2011), showing 93 Permanent pitches for the period 2006 to 2016, distributed North Wiltshire 51, South Wiltshire 21, East Wiltshire 6, West Wiltshire 15, whereas Core Policy 47 on page 185 of the Wiltshire Core Strategy Pre-Submission

Councillor	Core Strategy Reference	Comment																																																								
	Gypsies and Travellers	Document gives quite different figures in Table 6.2 split by so-called Housing Market Area (which I do not think is used anywhere else in that document) into North and West Wiltshire, South Wiltshire and East Wiltshire.																																																								
Cllr Francis Morland	Core Policy 1 : Settlement Strategy	<p>In respect of the Storridge ward of Heywood Parish, the Parish Council considers that the settlement boundary as defined by the Westbury Town Policy Limit should be retained unchanged.</p> <p>In respect of the Heywood Village ward of Heywood Parish, the Parish Council wishes that there should be no defined settlement boundaries at all.</p>																																																								
Cllr Francis Morland	Core Policy 2 : Delivery Strategy	<p>The total housing figure now proposed in Wiltshire for the period 2006-2026 is 37,000, a reduction of 7,400 (one sixth) from the figure for the same period of 44,400 proposed in the Draft Regional Spatial Strategy (July 2008). However, that total reduction has not been applied pro rata across the various Sub-Areas and former Districts, but as follows:-</p> <table border="1" data-bbox="562 587 2078 1466"> <thead> <tr> <th></th> <th>Draft RSS (2008)</th> <th>WCS (February 2012)</th> <th>Reduction</th> </tr> </thead> <tbody> <tr> <td colspan="4"><b>NORTH</b></td> </tr> <tr> <td>Chippenham SSCT</td> <td>5500</td> <td>4500</td> <td>1000</td> </tr> <tr> <td>West of Swindon</td> <td>3000</td> <td>200</td> <td>2800</td> </tr> <tr> <td>Other</td> <td>5200</td> <td>5030</td> <td>170</td> </tr> <tr> <td><b>TOTAL</b></td> <td><b>13700</b></td> <td><b>9730</b></td> <td><b>3970</b></td> </tr> <tr> <td colspan="4"><b>WEST</b></td> </tr> <tr> <td>Trowbridge SSCT</td> <td>6000</td> <td>6000</td> <td>-</td> </tr> <tr> <td>Other</td> <td>6300</td> <td>5870</td> <td>430</td> </tr> <tr> <td><b>TOTAL</b></td> <td><b>12300</b></td> <td><b>11870</b></td> <td><b>430</b></td> </tr> <tr> <td><b>TOTAL NORTH &amp; WEST</b></td> <td><b>26000</b></td> <td><b>21600</b></td> <td><b>4400</b></td> </tr> <tr> <td colspan="4"><b>SOUTH</b></td> </tr> <tr> <td>Salisbury</td> <td>6000</td> <td>6060</td> <td></td> </tr> <tr> <td>Other</td> <td>6400</td> <td>3840</td> <td></td> </tr> </tbody> </table>		Draft RSS (2008)	WCS (February 2012)	Reduction	<b>NORTH</b>				Chippenham SSCT	5500	4500	1000	West of Swindon	3000	200	2800	Other	5200	5030	170	<b>TOTAL</b>	<b>13700</b>	<b>9730</b>	<b>3970</b>	<b>WEST</b>				Trowbridge SSCT	6000	6000	-	Other	6300	5870	430	<b>TOTAL</b>	<b>12300</b>	<b>11870</b>	<b>430</b>	<b>TOTAL NORTH &amp; WEST</b>	<b>26000</b>	<b>21600</b>	<b>4400</b>	<b>SOUTH</b>				Salisbury	6000	6060		Other	6400	3840	
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		TOTAL	12400	9900	2500
		EAST	6000	5500	500
		TOTAL WILTSHIRE	444000	37000	7400
		<p>Clearly, the NORTH as a whole has had the largest reduction (29%), but even Chippenham SSCT within it has had a reduction (18.2%) of more than one sixth. Similarly the SOUTH as a whole has had a reduction (20.2%) of substantially more than one sixth.</p> <p>By contrast, Trowbridge SSCT has had no reduction at all, and the WEST as a whole has had only a marginal reduction (3.5%).</p> <p>This analysis also demonstrates very clearly how the merging into one of the NORTH and WEST Housing Market Areas (thereby showing an overall reduction of only 16.9%) has been used to disguise what has been done.</p> <p>I am doubtful that there is anything in the evidence base to justify why the reduction for the Trowbridge SSCT should not be broadly in line with the overall figures. A one sixth reduction would mean 1,000 less dwellings needed at the Ashton Park Urban Extension strategic allocation and would make the horrendous projected transport infrastructure problems there significantly less acute.</p>			
Cllr Francis Morland	Core Policy 29: Trowbridge Community Area	<p>Core Policy 29 Spatial Strategy: Trowbridge Community Area on numbered page 138 is less than clear in its meaning but appears to identify Ashton Park Urban Extension as the strategic allocation for 15 ha employment [land] and 2,600 dwellings in the area coloured dark purple on the map at Figure 5.19 Trowbridge community area on numbered page 133 and described in the Key to it as Strategic sites (and separated by an area coloured dark green and described in the Key to it as Indicative green spaces).</p> <p>In Core Policy 29 there is also a curiously worded reference to so-called development templates as shown by Appendix A. The relevant part of Appendix A starts at numbered page 262 under the heading Ashton Park Urban Extension, South East of Trowbridge and has another map with a Key to it showing an area coloured grey described as Indicative Mixed Use and an area coloured green described as Indicative Greenspace, which are both surrounded by a solid black line described as Strategic Site (to be included on proposals map).</p> <p>Beneath the map on numbered page 262 under the sub-heading Use are simply the words 2600 dwellings and 15ha of employment land, and on numbered page 264 under the sub-heading Delivery Mechanism there is further text stating</p>			

Councillor	Core Strategy Reference	Comment
		<p>explicitly that everything else will be left to prospective developers as part of the planning application process.</p> <p>The only conclusion that can be drawn from the above analysis is that within the solid black line marked on the map on numbered page 262, the layout and amount of the different land uses is wholly at the discretion of the prospective developers, and that none of the so-called master planning undertaken by them will involve any further public consultation until planning applications are submitted, which will then have the usual 29 day deadline for responses.</p> <p>It seems to me that this is a total abdication of responsibility by Wiltshire Council and in effect a free-for-all for the landowners and prospective developers of the Strategic Site to maximise their own commercial advantage. Furthermore, there is no other information in the public domain about the size of the Strategic Site and whether that size is appropriate for the amount of development stipulated. Hence, as the unhappy past record of such development in West Wiltshire repeatedly demonstrates, the final outcome may be many times what is now stipulated, simply because at the outset no-one asked the right questions (and the developers therefore kept to themselves how generously they had drawn the boundaries).</p> <p>The Strategic Site at Trowbridge is not alone in having any of these shortcomings of the consultation document, but as it is far and away the largest such site proposed, their consequences will be correspondingly greater in the Trowbridge Community Area than anywhere else.</p> <p>As you know, I would wish to see all mixed use strategic allocations divided up into specific areas for each separate land use and accurately measured and justified as appropriate for that specific land use and for the quantum of it stipulated and no more.</p> <p>Furthermore, I cannot for the life of me see how Wiltshire Council can entertain any hope of satisfying an Inspector of the soundness of any of these strategic allocations without producing exactly that information.</p>

## EXTRACT FROM RURAL FORUM SLIDE PRESENTATION IN RELATION TO SETTLEMENT STRATEGY

## Core Strategy - Settlement Strategy (Core Policy 1)

**Principal Settlements** - strategically important employment and service centres, focus for development

*Chippenham, Salisbury, Trowbridge*

**Market Towns** - locally significant development, increase jobs and homes to sustain and enhance services and facilities, promote better self containment

*Amesbury, Bradford on Avon, Calne, Corsham, Devizes, Malmesbury, Marlborough Melksham, Tidworth and Ludgershall, Warminster, Westbury, Royal Wootton Bassett*

## Core Strategy - Settlement Strategy

**Local Service Centres** - modest levels of development to support service and employment role for rural hinterland

*Pewsey, Market Lavington, Cricklade, Tisbury, Mere, Downton, Wilton*

**Villages** (large and small) - limited development to help meet local housing needs, improve employment, services and facilities

- Based on analysis of role and function - consistent approach

## Defining Villages...

## Step 1 Basic Analysis

- Analysis of villages (long list): <400 settlements
- Villages need either:
  - (i) Current planning status - e.g. In south Wiltshire, Housing Policy Boundary and Housing Restraint Areas considered; in north Wiltshire, Framework Boundaries or
  - (ii) No planning status - 2 basic facilities  
(Basic facilities defined in Rural Facilities Survey as shop, post office, primary school, meeting place/place of worship)
- Less restrictive than other approaches within neighbouring authorities
- Villages named in Core Policy 1 of South Wiltshire Core Strategy not re-examined (Secondary Village = Large Village; Small Village = Small Village)



## Step 2 - Detailed analysis of role and function

- Range of indicators used to determine large or small status
- Traffic light system based on themes & basic analysis
- Basic analysis (3 or more basic facilities 'green'; others 'amber')
- Four themes (detailed in hand out):
  - (i) Population & Employment (see example)
  - (ii) Transport & Communications e.g. bus services, community transport, highway capacity, broadband, mobile phone coverage
  - (iii) Leisure, Recreation & Other Facilities e.g. sports fields, GP surgeries, pubs, other community facilities
  - (iv) Deliverable land & constraints e.g. ability to develop, recent growth, environmental constraints (AONB, Green Belt, flood zone)

## Example - Population and Employment

3 criteria used:

- Population size: large >750; medium 250 to 749; small <250
- Employment in village: > 250 'green'; <100 'red'
- Self containment: live & work in village as % of economically active

Analysis of these:

- Green - Large or medium population, over 250 jobs in Village and a self containment score of at least 20%
- Red - Small population (<250 people), less than 100 jobs in the village and a self containment score of under 30%

## Final Assessment

- Traffic light system:  
good scores = green  
medium scores = amber  
poor scores = red
- **Large Villages:** More green scores than red scores
- **Small Villages:** All settlements taken forward unless they scored three or more red scores and no green scores

**REVISED MAP OF CHIPPENHAM STRATEGIC SITE SHOWING EXTENDED AREA OF INDICATIVE GREENSPACE**

**SCHEDULE 2: COMMENTS MAKING REFERENCE TO HUNTERS MOON, CHIPPENHAM, RECEIVED DURING CONSULTATION ON WILTSHIRE CORE STRATEGY CONSULTATION DOCUMENT, JUNE 2011**

Full Name	Organisation Details	ID	Consultation Response
Mr D R Ward		<a href="#">270</a>	<p>I am a resident of Lacock and must write to you to express in the strongest possible terms my objection to the proposal to undertake a huge development of up to 1,500 homes and 28 hectares of industrial development to the South of Chippenham in the Parish of Lacock.</p> <p>Below I will make a few comments on why the proposal (and the process by which it is being sought) is fundamentally flawed. I will follow that with some observations on why the proposal, if allowed, will destroy a village that is totally unique and now important on a international scale.</p> <p>I was at a hugely well attended public meeting at Lacock two weeks ago, where the village hall was in fact too small to accomodate the number of people that wanted to come and hear of, most with disbelief, the proposals for the first time. I would like to make 4 comments first of all on the consultation process itself:</p> <p>1) We were told at several points in the meeting, as if it were an article of fact, that "this is the best option, so its the one we're putting forward". Well, I would certainly disagree. There are other sites closer to the M4 and to the railway station that would more closely satisfy the Core Strategy's own objectives in respect of Chippenham, to utilise those strategic assets. Quite simply to locate the development in the furthest possible point away from the M4 and over 30 minutes walking from the train station (with only the narrow road through Showell and at Rowden Hill by which to get to the station by car) is a logic therefore that beggars belief.</p> <p>2) The early stages of this consultation have been back to front and unfairly loaded against the residents: The planning officials told us that if the proposal is to be reconsidered, the residents must provide them with 'evidence'. The officials will then consider that evidence and do the modelling. Specific examples are on pollution and traffic. This is absurd. We are not planning professionals. For such a major proposal, the evidence and modelling should have been provided first for us to consider. Following that bizarre logic to its end, if by some chance we here were all too meek or uninformed that we didnt object with evidence, then the planners would be free to allow all kinds of development. The public are being very poorly served. As it happens, the shortcomings of this proposal are so apparent fortunately I don't need the modelling to make this objection.</p> <p>3) It became clear during the meeting that a similar proposal to develop an industrial park at Showell Farm was rejected several years ago, because it was an isolated "island of development". To me, it appears that the only real change in this re-hash of that discredited plan has been to add MORE development to the South (housing at Patterdown etc) to link the industrial estate to the Southern edge of the town. In the process, the Parish of Lacock has been put even more under threat.</p> <p>4) The Council should in my humble opinion be doing more to overtly improve employment and commerce in the centre of the town, for example by promoting development allied with and attached to the technical collage near the station, before allowing yet more traffic producing out of town development. The proposal does not make the most of Chippenham's existing assets and I argue</p>

Full Name	Organisation Details	ID	Consultation Response
			<p>represents the Council abandoning the town centre's challenges in pursuit of an 'easy fix' solution.....which in turn will have disasatrous consequences for the village of Lacock.</p> <p>So, moving to my 7 key objections to the Southern option itself and the harm it will inflict on Lacock.</p> <p>1) Lacock is a nationally important asset, owned by the National Trust and makes a unique historical and cultural contribution to this country: Commercially it contributes employment for the National Trust and in tourism and the film industry. All this depends not just on Lacock as narrowly defined by its old houses, its churches and Lacock Abbey, but on Lacock in its genuine, working rural setting. It is the only intact Tudor Town entirely owned and preserved by the National Trust. Productions like the Harry Potter movies, Cranford and Pride and Prejudice have the pick of the world's locations in which to film, yet chose to do so in Lacock. Why? It is a very special village and should not be ruined by allowing urban sprawl into the Parish of Lacock.</p> <p>2) The loss of the unique rural setting of the village of Lacock: Part of Lacock's appeal to countless thousands of visitors who come here every year, and the residents who live and farm here, is its unspoilt countryside setting....driving to Lacock through hectares of industrial estate would undoubtedly in my view destroy its appeal to the thousands of people who visit us every year. These people provide the National Trust with revenue with which to secure the long term future of this unique village. If Lacock is effectively made a suburb of a nearby industrial estate and expanded town, I believe that less people will come here, placing under threat the upkeep of the village and eventually an amenity that tens of thousands of people every year year have enjoyed until now. Using a similar argument, The National Trust has negotiated, with neighbouring planning authorities, a "rural hinterland" around Avebury. The relevant Planning Authorities should do the same around Lacock. I was amazed to hear at the public meeting in Lacock the planning officials describe the productive argicultural land just to the north of this wonderful village as an "unconstrained site" in the context of the proposed expansion of Chippenham. Loose justification was given in the form of Central Government wanting to pursue this kind of development to kickstart the weak economy. Even to this noble end, to jeopardise the only intact Tudor Town owned by the National Trust, which has been largely undisturbed for several hundred years, is in my view just short-sighted madness.</p> <p>3) There are no direct benefits of the scheme to residents of Lacock: Despite the proposed housing and industrial estate being within the boundaries of Lacock Parish, it causes us only harms, no benefits.</p> <p>4) Lacock is in any case part of the Corsham Community Area: The process by which it could be 'commandeered' for a questionable expansion of Chippenham should surely be open to judicial review.</p> <p>5) The proposed development would eat up currently productive agricultural land: In these days of increasing food shortage and the drive to localism, to take away local greenfield farmland and build factories and houses on it, when Chippenham already has industrial sites that are empty or under-utilised (Focus DIY, Westinghouse, Hunters Moon etc) is short-sighted in the extreme.</p> <p>6) Traffic: Lacock is already threat from hugely increased volumes of through traffic that has resulted from the expansion of Melksham. Traffic comes along Forest Lane and down Bowden Hill and uses us as a high speed 'rat-run' for 2-3 hours per day. Many, many local and visiting families and young children like to ramble, cycle and ride horses along the lanes here and are being put into increasing danger. This proposed expansion of the South of Chippenham will inevitably add to this problem. Moreover, the industrial estate will bring lots of new traffic along the A350. The current section of the A350 from Lackham roundabout to Beanacre (running</p>

Full Name	Organisation Details	ID	Consultation Response
			<p>between Lacock and Notton simply cannot handle more traffic, whatever modifications were made to the A350 North of Lackham (which also is already log-jammed for large portions of every day particularly on the sections near Sainbury's). If any expansion is made to the South of Chippenham, the A350 will need re-routing to the West, beyond Notton. This itself would require the loss of productive agricultural land, so is another barrier to the proposed development. This proposal would cause a huge number of extra journeys and traffic across Chippenham, and as such would put unbearable traffic pressure on Rowden Hill as the main artery for the new residents and workers to cross Chippenham for schools and to get to the railway station. Rowden Hill is already blocked with traffic for much of every day.</p> <p>7) Environmental damage and flooding: The Avon already floods several times per year at Lacock and Reybridge. Whatever platitudinous assurances are given that measures will be taken, we cannot be sure that this proposed grand-scale interference with the flood plain will not make that problem worse. Moreover, the proposed industrial estate will pose increased risk of pollution discharging into the Avon. To build on the farmland at Showell and Patterdown will also impinge on wildlife habitat. Traffic pollution will be increased for us. Finally, at night, Lacock is one of the few places left that still has a dark black sky.....the proximity of this proposed housing and industrial estate will inevitably rob us residents and visitors of that. And for what?</p>
Elaine Sexton		<a href="#">271</a>	<p>I notice there is proposed housing development in inner Chippenham but there was a small white area to the west side of old A350 between the railway and the road. Why is this not designated for housing too as it is opposite one site of housing and the Hunters Moon site is the other side of the railway also designated. I believe the Council should fill areas within Chippenham before they move on to new sites. This was according to the Shlaa Plan put up in village hall at Lacock.</p> <p>Ref: purple shaded area of Showell Farm for proposed employment land. I understand the areas within Chippenham for housing etc. But this site/area is further out around Chippenham. There would be too much extra traffic towards the heritage village of Lacock and the Council should fill its empty industrial units before building more on the far outskirts of Chippenham.</p>
Mr Robert Simpson		<a href="#">369</a>	<p>South West Chippenham – Patterdown, Rowden, Showell and Hunters Moon Area</p> <ul style="list-style-type: none"> <li>• Development should secure the enhancement and protection of the Rowden Conservation Area and River Avon Corridor to manage the area's landscape quality and biodiversity, and promote recreational uses along with enhanced pedestrian and cycle access to the town centre. In particular, the River Avon is an important wildlife corridor which should be protected and enhanced.</li> <li>• Part of the site is located within a safeguarded minerals zone. Further consideration should be given to the opportunity to extract the mineral in the area in phase with development e.g. as part of flood mitigation measures.</li> </ul> <p>Not only will this proposal permanently remove invaluable agricultural lands it will also be extremely detrimental to the wildlife that inhabit those hedgerows and woods that surround them. The damage to the character and environment of the market town of Chippenham will also be irreparable.</p> <p>I do not agree with either option. If the council are indeed sincere in their statement regarding the security and protection of the Rowden conservation area &amp; also many other Greenfield sites, then the council should be looking at maximum optimisation of the entire brown field sites within the North Wiltshire area.</p>

Full Name	Organisation Details	ID	Consultation Response
			<p>This I feel would be a far better approach than to simply sell off our green field sites to developers. Not only will this option create employment it will also enhance the regeneration of Chippenham.</p> <p>Also the current traffic congestion between Showell, Patterdown and Chippenham at peak times is already a major cause of concern. Should the proposed sites in South West Chippenham be chosen it will significantly compound both the congestion and pollution problems already in existence and place great strain on the local infrastructure services which are already under pressure.</p>
G R Fox		<a href="#">447</a>	<p>Local Development Framework - Chippenham/Lacock</p> <p>I have attended a public meeting on the Core Strategy consultation document (June 2011) as it affects Chippenham/Lacock and would comment:-</p> <ol style="list-style-type: none"> <li>1. Resident in Lacock for the past 40 years I have the seen the expansion of Chippenham especially to the West. None of this has done anything to halt the decline of the town, particularly after the closure of the cattle market.</li> <li>2. Indeed the expansion with all the satellite supermarkets, including the ones in Melksham, appear to have virtually destroyed the town and increased the traffic.</li> <li>3. I understand that you are required to plan for 4.000 dwellings but I have not spotted the requirement for the employment option.</li> <li>4. There does not appear to be a demand for employment development. The Westinghouse sheds, the old Post Office and the old council offices all close to the railway station are available for offices and there are many "to let" signs on the western bypass.</li> <li>5. If employment land (for sheds ?) is required it should <b>not be the Showell land East of</b> of the railway as this will further spoil the approach to Lacock and be another step to amalgamation with Chippenham. The railway line is a natural boundary. This option has been rejected once for valid reasons.</li> <li>6. The Thingley land between the junction of the railway - Chippenham to Bath or Melksham - is a brown field site,just outside your designated area, and should be used. It has a good road from the A4. Negotiations with Network Rail ( or is it Ministry of Defence?) for the land should be pursued now. And why not the MOD land at Hartham?</li> <li>7. For residential the" Wiltshire 2026 preferred option" (2850+350+800) is the best with the proposed link road. The new Abbey school is not full.</li> </ol> <p>Thank you for the opportunity to comment.</p>
Mr Tony Peacock	Coordinator  The Showell Protection Group	<a href="#">932</a>	<p><b>The notes below are explored further in our main submission available as a separate document</b></p> <p><b>The Showell Protection Group has serious concerns over the current public consultation process on the Draft Core Strategy with regard to Chippenham. It is felt that information provided has been misleading, contradictory and completely opaque to the vast majority of lay people and elected members. This seriously calls into question the validity of key aspects of the process.</b></p> <p>The Council is to be applauded for holding a second round of public consultation on proposals for Chippenham following widespread concerns within the community following the first round of consultation. It is recognised that this was not a statutory consultation, but a</p>

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			<p>wish to engage with the public on proposed plans.</p> <p>However, the process appears to have been flawed and to have caused significant confusion which may well have influenced the scope and nature of the feedback received. This section identifies the main concerns of the Showell Protection Group.</p> <p>a) Question 5 on the Core policy for Chippenham states ‘ <i>Core policy 5 includes two options for the location of future growth in Chippenham. Please indicate which strategic option you would support and explain why</i>’. This would clearly indicate that comments are requested only on the two options proposed. It is understood that this was exactly the interpretation placed in the question by the Planning Committee of Chippenham Town Council in formulating their response. Discussion on other options was not allowed to be considered at the Planning Meeting and a proposed amendment offering a third option was ruled out of order.</p> <p>b) The above interpretation does however appear to be in direct contradiction with the opening paragraph of Draft topic paper 14: Site Selection Process, June 2011, which states ‘<i>1.1 It is important to note that the site selection process is ongoing and it will continue to evolve as new evidence comes forward, including the responses to the latest stage of public consultation</i>’ The wording of Question 5 therefore appears misleading.</p> <p>c) Much has been made of the fact that there has been several major face to face consultation exercises, including the ATLAS facilitated workshop and the Chippenham Vision Board public meeting. However, at no time during these meetings were the current Option 1 and 2 put forward for discussion. All of the formal discussion related to the merits of the four original options, not the current ones. Much has been made of the ‘public view’ expressed at these meetings in supporting the current proposals, but there was, in fact, little reference to the current options.</p> <p>d) The current proposals appear, in part, to arise from a rejection of earlier options. There has been no opportunity for public discussion of the current proposals other than one very well attended public meeting in the Lacock Village Hall called, not by the planning team, but by one of the Council’s elected members. In passing, it is noted that the overall mood of this meeting was to reject both of the currently proposed options.</p> <p>e) The sheer complexity of the consultation documents make it virtually impossible for a layperson (or elected member!) to comment from an informed position. This is particularly unfortunate in the new climate of ‘localism’, where members of the public are encouraged to play a greater part in determining the future of their community. Such involvement requires people to be well informed with access to information in an easily accessible format. It is of little surprise that so few people (including elected members) have read all of the main consultation document given it runs to nearly 200 pages, let alone the 20/30 supporting/historic documents. Information could well have been presented in a more coherent format with better indexing of supporting documents.</p> <p>f) Core information has been presented as ‘facts’ whereas it is often data that is open to interpretation. For example it has been claimed that there is large scale out-commuting from Chippenham. This may be the case, but the ‘facts’ are based on the 2001 national census, now 10 years out of date. Furthermore, as is identified later in the Showell Protection Group response, this data is directly contradicted by at least two other Council sponsored technical reports that claim Chippenham is ‘self contained’ (see notes on ‘Out-commuting’ in our full submission).</p>



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			<p>g) It is recognised that attempts were made to inform local people of proposals particularly by the holding of a series of local exhibitions. At the time of writing it is not known how many people attended the exhibitions, but from the observation of several of these events the numbers were low. This would suggest there were issues with both the style and content of the promotional material for these events.</p> <p>h) Where local activists encouraged attendance, as happened with the Lacock public meeting, (where three independent groups promoted the meeting), over 150 people attended with many more unable to get into the meeting.</p> <p>i) The omission of any reference to the Showell/Patterdown/Hunters Moon development from the proposals on the Corsham Community Area plans has caused considerable confusion. There is anecdotal evidence that local Corsham people having, understandably, only read the Corsham Community Area section of the proposals were totally unaware of the large scale developments proposed in the Community Area.</p> <p>j) Further, references to 'Lacock' in the Corsham Community Area section make specific reference to there being no major development activity associated with the village.</p> <p>k) The incorrect map for Option 1 in the consultation documents for Chippenham is most unfortunate as it presents a misleading picture of the proposal. Once this was pointed out to the spatial planning team by the Showell Protection Group, an errata message was inserted on the consultation site, but not in the Chippenham section! The erroneous map of has remained throughout the consultation. This added an unnecessary level of further confusion to the process.</p> <p>l) There have been repeated calls by the Local Authority officers and members for contributors to provide 'evidence' in their submission. It is, of course, nearly impossible for the layperson to offer technical evidence on issues such as the impact of development on infrastructure, the environment, etc. What they are able to provide is their opinions/aspirations on issues such as the visual impact of developments or concerns about traffic or access to schools etc. Repeated comments by officers seem to classify this as not being 'evidence', but 'nimbyism' with little credibility. It will always be the case that feedback from laypersons will be at a subjective level. This does not devalue it in any way. If local Government wishes to engage more meaningfully with its electorate then public opinion must be taken into account in a credible manner.</p> <p>m) The 'Supporting Documents' tab on the main consultation site makes no reference to the numerous Topic Papers that underpin the draft proposals.</p> <p>n) The fact that Options 1 and 2 have only comparatively recently been proposed has meant that there has been no opportunity for many agencies to comment on these proposals in a format that can be fed back to others to comment on. It will be interesting to see how many responses are received from such agencies to the new proposals.</p> <p>o) There is some confusion over what sites can be considered as part of the strategic planning exercise. In repeated public presentations officers of the Council have stated that only sites 'put forward' or 'promoted' can be considered. This would seem to be at odds with guidance provided in the 'Strategic Sites, Background paper October 2009 section 4.9' where it is stated that the initial</p>

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			<p>list of sites considered were obtained from the following sources:</p> <ul style="list-style-type: none"> <li>• <i>Sites allocated for housing in each previous district's Local plan which are partly or fully unimplemented</i></li> <li>• <i>National Land Use Database returns</i></li> <li>• <i>Previous Urban Capacity Studies</i></li> <li>• <i>Inspection of OS base maps and aerial photographs</i></li> <li>• <i>Officer knowledge</i></li> <li>• <i>Sites identified through consultation exercises by the previous district councils</i></li> <li>• <i>A 'call for sites' exercise from both the former districts who carried out the SHLAA</i></li> </ul> <p>This guidance would seem to indicate that where consultation respondents were unhappy with either Option 1 or 2 they are at liberty to offer alternative suggestions. This was however not clear in the guidance provided in the public consultation.</p> <p>p) The draft consultation document repeatedly makes reference to the housing requirement being determined through a comprehensive review <i>'involving local communities' and 'reflecting local people's aspirations'</i> . In reality the proposals appear to have far more to do with the stated <i>'assessment of the political aspirations of the Council'</i></p> <p><b>1 Factual inaccuracies relating to Showell Farm</b></p> <p>Current data relating to Showell Farm appear confused.</p> <p>The site is identified in the Draft Core Strategy as being 28.85 hectares of available land. In previous discussions and public enquiries the site is stated as being 25 hectares (ref public inquiry 1999).</p> <p>The Wiltshire Employment Land Study identifies Showell Farm as being in the ownership of 'Lackham'. This is incorrect, a significant minority of the site is owned by the Telling family, the current owners and residents of the Showell Farmhouse. A further small parcel of the land is owned by the Pierce family.</p> <p>In several recent public consultations it has been stated by the planners that 8 hectares of the site would not be used for development, but would be used for 'landscaping'. No explanation has been given for this quantum, but is it supposed that this would include the required buffer around the three listed building of the Showell Farm and the nearby archaeological site.</p> <p>It is understood that, in 2007, as part of their site investigation in the Rowden Lane/railway embankment area, Redcliffe Homes commissioned two assessments of land contamination from Robson Liddle Ltd (consulting engineers) and Wessex Water. Both reports indicated significant contamination levels that would require considerable remedial work before the land could be used. It is further understood that some of this contamination was judged as associated with the railway line usage. If correct then it is reasonable to surmise that the land adjacent to the railway embankment on the boundary of Showell Farm is likewise contaminated thus further reducing the availability of land. There is anecdotal evidence that the rearing of pigs was moved from this area due to</p>

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			<p>contamination fears. The issue of contamination will require further investigation.</p> <p>The cumulative effect of the above is that the site would appear to have a usable area very significantly lower than the estimated 28.85 hectares. This begs the question 'how much land is actually needed?'</p> <p><b>2 Conclusion</b></p> <p><b>Taken together, this catalogue of errors, omissions and complexity, leaves Wiltshire Council open to a formal challenge on the validity of the consultation process.</b></p> <p><b>References</b></p> <p>Applications called in under section 77 of the town and country planning act 1990: For development by Crest Nicholson Properties Ltd and Hygrade Foods Ltd; at Showell Farm, Chippenham, Wiltshire. Applications APP/J3910/V/99/000028/P2 and 000029/P2; 1999</p> <p>Wiltshire 2026; Planning for Wiltshire's future; Strategic sites; Background paper 2009</p> <p>Housing requirement technical paper: Technical paper setting out the housing requirements for Wiltshire 2006-2026. 1.3, 1.10.d</p>
Mr Phillip Case		<a href="#">1218</a>	<p>The opportunity to utilize Langley Park for employment in Chippenham should be taken in the core strategy. This will bring business to the town centre and the employees will then shop, eat etc in the town helping the ailing town centre economy. Larger scale employment land should be accommodated at Rawlins Farm, and South near Stanley Park.</p> <p>Southern options for employment at Showells Farm, should not be considered. Hunters Moon is currently allocated for employment and should be utilized first.</p> <p>I therefore object to the Southern option.</p>
Jenny Hearn		<a href="#">1228</a>	<p>I object to the Hunters Moon and Showells Farm proposals.</p> <p>Why build so far South at Showells when Hunters Moon is currently allocated for employment and unused? Could it be the case that the owners of Hunters Moon are holding out for a higher value by changing the use of Hunters Moon from employment to Residential? Why are the council potentially allowing this? Methuen Park is reasonably well occupied and a phase 2 would be good for employment at Hunters Moon.</p>

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			<p>Please use existing employment land before proposing land elsewhere.</p> <p>I see no reason to build to the South of Chippenham. The East is a better place to build, near Abbeyfield School, with access to the town centre, railways etc.</p>
<p>Mr Derek Jenkins</p>		<p><a href="#">1237</a></p>	<p>I would like to see Chippenham become a quality "green town" where the environment and the future was taken seriously. Building on the South of the town will not achieve this.</p> <p>People should be encourage to walk to work, shop, school etc - the mistakes made in the 1980's and 1990's developments where the car was "king" should not be repeated in 2011.</p> <p>If development is needed, please ensure that it is undertaken on the highest environmentally friendly and sustainable basis.</p> <p>I can see no circumstances where building near Showells Farm and Hunters Moon meet these wishes - I object.</p>
<p>Louise Wilkins</p>		<p><a href="#">1246</a></p>	<p>I object to the proposed development to the south of Chippenham at Showells, Hunters Moon, Patterdown and Rowden.</p> <p>The previous planning and expansion of the retail stores at B and Q, Sainaburys as well as the Bumpers Farm retail has caused enormous damage to the town centre. Promoting employment and more housing on this side of town will undermine this trend. The A350 is becoming the town cnetre. The only way to start to reverse this trend is to invest in the town cnetre and encourage employment back to the heart. This could be acheived by securing employment at Langley Park and promoting an eastern ring road, with a spur into Cocklebury Road. This will give a new eastern access to the town. Employers will then invest in the centre and employers will spend in the town. The downward spiral will only then start to reverse.</p>
<p>Mr John Smith</p>		<p><a href="#">1248</a></p>	<p>I object to building at Showells Farm.</p> <p>Bumpers Farm is a successful development - but a victim of its own success. This should now be extended West on the A420 at Allington. This could provide a decent pub, hotel and cafe for the workers, car parking and new employment opportunities for business. Some of the uses such as the gym and dance studio could be accommodated at the front on the road junction whilst heavier industry could go on larger sites at the rear. This would become phase 2 of the development. Hunters Moon would continue as employment land and be suitable for offices.</p>
<p>M A Hunt</p>		<p><a href="#">1266</a></p>	<p>I object to the proposed development to the South of Chippenham at Showells, Hunters Moon, Patterdown and Rowden.</p> <p>I am staggered that the council have adopted what they call a dispersal strategy. This basically is a fudge to try and calm public fears about new development, what the dispersal strategy does is promote development in areas that few people care about, in the vain hope that Chippenham will eventually regenerate. The past 20 years of development on the outskirts of Chippenham have proved that the A350 strategy is flawed - why repeat the same mistakes. Councillors must understand that they have a responsibility to ensure that planning is undertaken responsibly. New infrastructure and development close to the town centre is the only way to regenerate the town. Do not avoid this issue please make bold planning decisions to the town centre to ensure the town survives.</p>

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Jason Denness		<a href="#">1338</a>	<p>The strategic allocation of housing and employment land that previously included land to the east of Chippenham has now been altered to exclude that land and concentrate almost entirely in one area (excepting the small area North of the town) - South West of the town in the Patterdown, Rowden, Showell and Hunters moon area (Option 2). Our concerns with this proposed option are:</p> <ol style="list-style-type: none"> <li>1. The scheme is not adequately distributed across Chippenham. The vast majority of employment land and housing will be located in one area which is Greenfield land and beyond walking distance of the town centre.</li> <li>2. The proposed area at Showell farm is beyond the current boundary of Chippenham and is in fact within the Corsham community area. It therefore seems disproportionate to place the majority of new employment and housing in an area that is not actually part of Chippenham. In addition, the Corsham Community Strategy states that "Corsham has not been identified as a location for new strategic growth" which is in contradiction with the proposed Option 2.</li> <li>3. Location of employment land would be better served by being closer to the main traffic routes into Chippenham, which is predominately to the North from the M4 but, also from the A4 and A420. The only major traffic route to the South West of the town is the A350. Given the already high loading on this road at peak traffic hours and the lack of any public transport options to the proposed area then there will be a significant increase in "rat-run" traffic travel through the surrounding villages and hamlets resulting in a significant negative impact on those communities. These roads are already in poor condition (eg potholes) and further traffic load will cause increased deterioration of them</li> <li>4. With the proposed development of housing in Melksham the commuter route from Melksham to Chippenham will lead to a significant increase in traffic not only on the A350 but also on the existing "rat-run" via Forest and Lacock. This inevitable traffic increase will have a significant negative affect on Lacock and the surrounding hamlets and damage this important tourist attraction.</li> <li>5. Due to the distance from the town centre travel to/from the town from the site(s) will inevitably result in an increase in car journeys. Not only is this counter to environmental policy but also the infrastructure within the town is not able to support this level of expansion including parking, medical schools, doctor surgeries etc.</li> <li>6. The location will result not only in urban sprawl but significantly increase traffic flow from the North of Chippenham as traffic to/from the M4 will have to circumnavigate the town. The A350 already has significant congestion problems during peak hours and adding a significant increase in traffic will only exacerbate the issue. This will be exacerbated by the proposed early development of employment land at Showell Farm as it is proposed that this area is developed prior to any other development or improvements.</li> <li>7. There are already a significant number of unused employment units within the Chippenham area including Langley Park and Bumper's Farm. It would be more sensible to update these sites and increase their occupancy rather than building additional capacity, which would have a further negative impact on these existing sites.</li> <li>8. Although the council has the aim of increasing work / home co-location with the scheme there is no evidence that development of</li> </ol>

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			<p>employment and housing in close proximity leads to a significant reduction in "out-commuting". People choose the location to live based on many other factors other than their employment location. Therefore, the proposed plans can have little more than an aspiration that there will be significant local commuting between the housing and employment locations by means other than car. Should these aspirations be incorrect then the traffic levels will increase significantly damaging the environment and the local communities.</p>
<p>Mr Edward Heard</p>	<p>Chippenham 2020</p>	<p><a href="#">1343</a></p>	<p>I object to the proposals to build on the South of Chippenham at Hunters Moon, Showells Farm, Rowden, and Patterdown.</p> <p>The Draft Core Strategy says <b><i>"Specific issues that should be addressed in planning for Chippenham Community area include:"</i></b> (Each specific issue is marked in italics and in bold.) My comments on each of these laudable points are below.</p> <p><b><i>1. The River Avon is an important asset for the town and should be better integrated with the town centre reflecting its differing roles as it flows through the town, as a green corridor for wildlife, as a recreational space and as a sustainable transport route for pedestrians and cyclists.</i></b></p> <p>The river flows through the town centre as far as the weir behind Borough Parade. Beyond this it flows to open Countryside. The proposals to build to the South of Chippenham have tried in vain to adopt the river. This will lead to an unmanageable and unwieldy area of so-called park. It will be too big to police and maintain and ruin the rural nature of this high quality Wiltshire Farmland. The river itself has a lower level of flow below the weir, and therefore is not suitable for leisure uses. This area of river should be left as it is and enhanced for conservation purposes.</p> <p>In contrast the river above the weir is wider and already runs through Monkton Park. Chippenham Residents already enjoy this facility - but it could be so much better; it is already successfully utilized for events, this could happen on a more regular basis. The area of Park adjacent to the town centre bridge could also be used for a weekly open-air market. Facilities such as the golf course, and the Naval cadets base, could be enhanced, in part using funds raised through development.</p> <p>An Eastern extension to the town would utilize this park for access to the Railway station, Wiltshire College, and the Town centre. The Park would become the sustainable cycle and pedestrian lung that connects The Station, College, Monkton Park, Hardens Mead and the East to the Town Centre. The initiative to encourage Government departments to relocate to Chippenham under the Lyons review by forming "Government Property Vehicles" "GPVs" would also connect into the park as access to all these areas, making Monkton Park the connection corridor to the centre of the town's amenities.</p> <p><b><i>2. Chippenham has a net out-flow of commuters and future development should redress this.</i></b></p> <p>The Town centre has the potential to become one of Chippenhams' main assets but at present it is neglected and does not encourage people to live, work and play here. Investment for Jobs, Housing, leisure or amenity must readdress this. Building to the South will not aide this aim, it is too remote.</p> <p><b><i>3. New employment provision in Chippenham should be seen as a priority. There is currently a shortage of suitable employment land for expansion of existing businesses to secure inward investment. This includes suitable workspaces for</i></b></p>

Full Name	Organisation Details	ID	Consultation Response
			<p><b><i>start-up businesses and business units.</i></b></p> <p>The intention of this statement is good, however the proposed delivery is bizarre. The stated shortage of employment land is incorrect, what is lacking is a clear strategy to deliver it to occupiers. Hunters Moon is a classic example being approximately 10 hectares' and currently allocated for employment. The site is potentially connected to Methuen Park by an existing spur road, which is less than 20 meters away. Topic paper 14 sates "it is well known locally that this site will not come forward for employment". This is a ridiculous and unqualified statement. We have investigated market perception for this site and would make the following comments;</p> <ol style="list-style-type: none"> <li>1. It is perceived locally that the landowners were always unlikely to promote development for employment use, rather preferring to wait for residential planning (which has a higher value).</li> <li>2. Access to the site was commented to be poor, however Herman Miller currently use this access for the blue building, and a 20 meter extension to the spur would create a second and main access, a third is from the south under a railway bridge and a fourth could be created from the A350 by building a second 20 meter slip road on to an existing road into the site. No attempt has been made to utilize any of these access points - however the cost would be minimal.</li> <li>3. The site is seen as having challenging topography however large areas of the site particularly fronting the A350 are level and the topography is similar to that of the adjoining Methuen Park.</li> </ol> <p>Why does the current proposed core strategy take this site out of employment use and into residential use??</p> <p>Langley Park is a 50-Acre existing employment site adjoining the railway station. This site is currently 60% vacant. The Core strategy proposes housing onto part of this site. Langley Park has the potential to become a successful employment site with proactive redevelopment and management. It has a fantastic location immediately adjacent to the station. The former post office on station hill, which has 7,000 sqft of offices, has recently been marketed to occupiers. In planning to redevelop the site, the developers Lanfear LLP, approached 2 Chippenham companies who both wanted to occupy the site. Our experience of the Chippenham office market demonstrates that occupiers want good space in this location. Langley Park could provide this and a development similar to the Paintworks in Bristol, which has attracted media, and technology jobs would be appropriate in this sustainable location.</p> <p>In section 5.1.31 of the Draft Core Strategy documentation Showells Farm is stated as providing 28 hectares of employment land. The Draft Core Strategy has a foundation built around deliverable employment land - it has since come to light that this figure is incorrect and that this site can only provide 18 hectares of employment land. How can a strategy be built around such weak evidence? It is also not stated how the infrastructure to accompany this development will be achieved - the site lacks access, drainage, and any form of service provision for those who will work there. The same can be said of Bumpers Farm - where the access roads have been littered with café vans and parked cars. What is more worrying for the town is that this proposed development does not connect to the town centre. At its closest point Showells Farm is 29 Minutes walk to the town centre or 1.8 miles with 5 road crossings. A walk through the proposed Country Park takes 35 minutes. Therefore the stated aims that "Chippenham has a net out flow of commuters and future development should readdress this" Given that this site is in the Corsham community area I cannot see how this meets this aim. Furthermore a government-planning inspector who has previously rejected this site for employment underlined this point by stating "Developmentat Showell Farmwould be visually isolated from the town and detrimental to the rural</p>

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			<p>character of the landscape that lies between Chippenham and Lacock".</p> <p>What is currently lacking for the town are large-scale employment sites suitable for heavier B2 industrial uses. These sites must be away from housing and able to accommodate larger industrial uses. There are a number of sites that could be accommodate this use:</p> <ul style="list-style-type: none"> <li>• Land off the A420 at Allington Bar Farm and Baileys Field, this is opposite Bumpers Farm, and already has an scrap yard to the West. New employment provision on this site is a popular option with people and employers in Chippenham, it is well connected to the motorway, it would require a small amount of infrastructure and road improvement to the A350, it is already served by bus routes and would have the added advantage of being able to be planned with service provision such as a pub and café to support both it and the existing industrial estate opposite at Bumpers Farm. The "churn" of sites as companies grow and contract could be well serviced between the new and old sites - all located off one roundabout.</li> <li>• Kington Park to the north of Chippenham, this site is an existing employment site with a further 8 hectares of agricultural land adjoining it. This is easily accessible, deliverable and requires minimal infrastructure and road improvement.</li> <li>• The East of Chippenham will also provide plentiful and most importantly sustainable employment sites, which are located near to the train station, Wiltshire College and the Town centre. This can provide a variety of employment land, which will include offices and industrial use. Employees will use the town centre to shop and for leisure - this will form a vital part of the regeneration of the town centre.</li> </ul> <p>The initiative to create GPV's Government Property Vehicles or Hubs is a very exciting opportunity for Chippenham. The criteria are that these should be located within 15 minutes walk of a railway and within 90 minutes of London. Chippenham meets this criteria. Showells Farm is not within a 15-minute walk of the station - however Langley Park, Rawlins Farm and part of Hardens Farm all meet this criteria and given that this has the potential to bring 5,000 jobs to Chippenham this should not be ignored.</p> <p>Once the Eastern Ring road is built the land to the East of the town will be easily accessed and access will also be given to improve road access to Langley Park.</p> <p>Please see <b>appendix 1 "Walking plan South and East"</b></p> <p><b><i>4. Chippenham's offer as a service centre needs to be enhanced, particularly the town centre for retail, leisure and the evening economy in order to reduce the outflow of shopping and leisure trips.</i></b></p> <p>The town has deteriorated as a regional service centre since the cattle market left the centre. There are few service businesses in the town and this is in contrast to other Wiltshire towns where service industry continues to thrive. Leisure provision is also very poor. The Friday and Saturday night trains to Bath are very busy as people leave Chippenham to go out in Bath. The only way to begin to stem this tide is to encourage investment in the town centre. The river is the obvious place to promote quality restaurants. Langley Park is suitable in part for Leisure - recent consultation with Chippenham residents suggested that a cinema, bowling ally, nightclub and restaurants would be popular on this site. Employment on this land would also fed other investment in the town; restaurants cannot</p>



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			<p>survive without a target audience. Once a critical mass of customers is established others will follow, at present many who live regionally only use Chippenham town centre for the station and nothing else. Aspiration of the town needs to be raised.</p> <p><b>5. Securing expansion to Chippenham's town centre and improved retail offer through redevelopment of the Bath Road Car Park/ Bridge Centre is key along with redevelopment of other smaller town centre sites and enhancement of the public realm and the market.</b></p> <p>Agreed but this should form part of a comprehensive town centre strategy in line with a master plan.</p> <p><b>6. Further out of centre retail development in Chippenham could weaken the town centre and edge of town centre development needs to enhance the offer, not displace it or have a detrimental impact.</b></p> <p>This should say "will weaken" and not "could weaken". 20 years of decline to Chippenhams town centre has proven this to be the case. It would be a disaster to build at Hunters Moon, Rowden, Patterdown and Showells and further enforce this poor strategy.</p> <p><b>7. Chippenham has limited Brownfield opportunities within its urban area, although significant potential exists for regeneration within the central area.</b></p> <p>It is correct that Chippenham has limited Brownfield opportunities and therefore it is vital that they are utilized for employment and to enhance the town centre. Langley Park must be utilized for employment and Leisure and Hygrade should provide an overflow car park for the town centre instead of loosing these sites to housing.</p> <p><b>8. Many areas around Chippenham with potential for future development are constrained, particularly in relation to their environmental value or the need for significant highway improvements to unlock them. Careful consideration is needed to identify suitable urban extension sites, which could involve encroachment into the Calne and Corsham Community Areas.</b></p> <p>The strategy to build the road to the East is the only solution that will deliver regeneration to the town centre. It will also relieve many of the environmental issues that are being caused by Chippenham. Traffic congestion in the town will improve. Residents will have sustainable means of transport offered to them by choice. The current effects of congestion in Chippenham, that cause Rat run traffic in the village lanes around the town will be improved. This is particularly true of villages with connection to Calne such as Tytherton Lucas, Bremhill and Lacock. Environmental issues such as flooding will also be improved, as measures will be afforded to ease the flooding issues at places such as Kellaways.</p> <p>The cost of such improvements has been demonstrated to be deliverable and afforded by the proposed development. Internal town issues such as providing a second access to Cocklebury road and station hill are benefits that will aide town regeneration.</p> <p><b>9. Although the outlying villages within the community area are identified as larger villages within the settlement strategy, dormitory relationships will further constrain the type and level of development, which should take place.</b></p>

Full Name	Organisation Details	ID	Consultation Response
			<p>This should be approached on a village-by-village basis.</p> <p><b>10. There is a need to plan for the potential reuse of the Hullavington MOD site, which is designated as a conservation area and an important heritage asset should it become surplus to requirements.</b></p> <p>This should be considered in the future if Hullavington is released by the MOD.</p> <p><b>11. The former chicken factory site in Sutton Bengier needs to be redeveloped and provides the opportunity to deliver local housing and to support rural services and new employment opportunities in the village.</b></p> <p>Agreed.</p> <p><b>12. Provision of a shared site for GP, Fire, Police and Ambulance services at Chippenham to improve service delivery.</b></p> <p>This should be integrated into the proposed "GPVs" hub as previously described.</p> <p><b>13. Hardenhuish and Sheldon Secondary Schools are oversubscribed. Abbeyfield School has spare capacity, and in the short term could accommodate some additional school places. Further work is required to assess the need for a new secondary school or the expansion of Abbeyfield School over the plan period to 2026.</b></p> <p>Development in the South of Chippenham is not well connected to Abbeyfield. It will encourage pupils and parents to use the car for access. Development to the East would be easily accessible to the school and could allow pupils to walk or cycle to the school safely. There is also room on the site to build an extension to Abbeyfield or additional schools.</p> <p><b>14. The cemetery at Chippenham has limited remaining provision. Therefore, making new land available for cemetery provision should be considered.</b></p> <p>Agreed - land is available to the East.</p> <p><b>15. Public transport connectivity and pedestrian and cycling links between the town centre, railway station and Wiltshire College campuses needs to be improved including better integration of different modes.</b></p> <p>This is impossible to achieve in a sustainable way by building south, whilst it is easily achieved in the East.</p> <p><b>16. Essential infrastructure improvements are required to deliver benefits (health, safety, journey time predictability, town</b></p>

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			<p><b><i>centre access, public transport efficiency) from improved movement of traffic around Chippenham.</i></b></p> <p>The overall plan must deliver a ring road to the East of Chippenham. This is the cornerstone of any sensible strategy for the town. Within this a fully integrated strategy that provides sustainable connectivity within the town should be put in place.</p> <p>Please see the attached <b>appendix 2 PFA Assessment of Traffic impact of potential new road infrastructure in Chippenham.</b></p> <p>This demonstrates that an Eastern Ring Road will deliver a reduction in congestion in Chippenham of 30% at peak times.</p> <p>This cannot be achieved by weighting development to the south of Chippenham and placing further emphasis on the A350 corridor, <b>appendix 2</b> demonstrates that an A350 duel carriageway delivers a 10% reduction in traffic.</p> <p><b>17. Appropriate flood mitigation measures including sustainable drainage will be required.</b></p> <p>The flood situation to the North East of Chippenham needs to be resolved. The development of the East of Chippenham could provide funding for a long-term solution to this issue. This is something that needs to be embraced - if this does not go ahead this problem will persist for those living to the North East.</p> <p><b>18. Play provision in the town could be improved, including the delivery of a suitable site for a skate park.</b></p> <p>Recent consultation undertaken by Chippenham 2020 with Chippenham residents underlines the need for all types of play and leisure provision within the town. Monkton Park was highlighted as an underutilized asset to the town, which whilst it is used and loved by residents - it could be so much better. A walk through this park in the daytime at present takes you past people drinking and loitering. If this is utilized as the green lung into the town from an expansion to the East funding for improvement of facilities within the park will surely follow. Once the park is improved and fully utilized the people themselves will better police social problems.</p> <p>The proposed park to the South is not connected to the rest of the town, however many gimmicks are introduced to make it sound attractive, it is too big to police, too remote and will become a nuisance haven.</p> <p><b>19. Existing electricity power lines located to the east and south of Chippenham should be regarded as permanent features and avoided as part of any master planning of urban extensions to Chippenham.</b></p> <p>These can be utilized along road routes and taken into consideration within master planning.</p> <p>The core strategy states in chapter 5.1.14 the proposed key principles to be addressed in developing the Chippenham Central Area are:"</p> <p><b>A place to live and work</b> - Create a sustainable community through the provision of appropriate employment and business land in</p>

Full Name	Organisation Details	ID	Consultation Response
			<p>order to enable the opportunity of working locally and to reflect the needs of the local economy.</p> <p><b>The river as a defining and connecting feature of the town</b> - The River shall be the central feature of the town's identity. The river and riverside shall be improved and developed in sections that reflect its differing roles within the town environs. Major developments that are near the river shall maximize the attractive incorporation and use of the river within the scheme, and shall not take place in stretches of the river with exceptional natural beauty.</p> <p><b>A retail destination of choice</b> - The creation of a range of units to meet current and future retail business needs, improve the attractiveness of the town through public realm enhancements and focus the retail offer on the town centre</p> <p><b>A vibrant business location</b> - The plan will seek to take advantage of the excellent rail and road links and Chippenham's position on the high tech corridor between London, Bristol and beyond.</p> <p><b>An accessible town centre</b> - The plan will establish routes, public open spaces, buildings and landscape within a cohesive framework to create a lively visual and social environment focused on linking all parts of the town with its centre.</p> <p>In considering these laudable aims it would appear that it is impossible to achieve these with the proposals set out in the Draft Core Strategy. I would highlight the following;</p> <p><b>A place to live and work</b></p> <p><b>The river as a defining and connecting feature of the town</b></p> <p><b>A retail destination of choice</b></p> <p><b>A vibrant business location</b></p> <p>These aims are delivered by the 2009 preferred option at the East of Chippenham. The consultation had 101 responses to the question of "Do you agree with the preferred strategic site option for this community area?"</p> <p>Of these 85 were objections split to 65 from residents. 34 of these residents were objecting building near Birds Marsh and only 31 to building on the East of Chippenham. The remaining 20 objections were from professionals acting for landowners and local interest groups. Approximately 300 people attended a meeting called to discuss the Core Strategy in February. It was clear that the opposition to development at this meeting came from the opponents of building at Birds Marsh and residents of Monkton Park - which overlooks the Eastern Option.</p> <p>The revised draft core strategy would appear to be driven by the following;</p>

Full Name	Organisation Details	ID	Consultation Response
			<p>1. A requirement for easily deliverable large-scale employment land suitable for heavier industrial employment uses.</p> <p>I believe that this can be achieved elsewhere in far more suitable locations as detailed above.</p> <p>2. A political concern over a "minority Nimby" public opinion and a strategy to disperse controversial development around the town.</p> <p>The dispersal strategy, which has emerged as a result of the small number of objectors detailed above - will have a profound and detrimental effect on Chippenham. This attitude to regeneration of the town centre - will cause the long-term decline of the town - which is already well advanced. A longer-term view must be taken. Councillors supporting these objections for the sake of votes should consider the detrimental effect they are having on the future of the town.</p> <p>Dispersal is short sighted and meaningless, housing will continue to be required over the next few decades. A weak Dispersal strategy will be followed by a further requirement for housing in the future, when further pressure will be put on Greenfield development elsewhere. A long-term strategy should be adopted now to take care of housing for the next 30 years.</p> <p>The Eastern Ring road will also solve many of the problems in the town with traffic. It has been confirmed that this road will provide a 30% reduction in traffic congestion. Duelling the A350 will only provide a reduction in traffic congestion of 11%. In addition it has been proved that the Eastern Ring road is cheaper to build than the A350 duel carriageway.</p> <p>A logical review of the evidence provides overwhelming proof that an Eastern ring Road to Chippenham will bring long-term benefit to the town and in particular the town centre. This ring road will provide the infrastructure to give access to regenerate existing brown field sites for employment, and create a new and exciting mixed use Eastern extension to the town. Please do not miss this opportunity for the sake of short-term political convenience.</p>
Mr Alexander Robson		<a href="#">1361</a>	<p>I object to the Southern option for employment land and housing at Showells Farm, Hunters Moon, Patterdown and Rowden.</p> <p>These options are too far from the town centre and therefore unsustainable.</p>
Candida Robson		<a href="#">1362</a>	<p>I object to the Southern option for employment land and housing at Showells Farm, Hunters Moon, Patterdown and Rowden.</p> <p>Please reconsider options that are closer to the town centre.</p>
Mr Edward Heard	Chippenham 2020	<a href="#">1598</a>	<p>I object to the proposal to build in the South of Chippenham at Hunters Moon, Showell, Patterdown and Rowden for the following reasons;</p> <p>In Chapter 5.1.5 the Draft Core Strategy states, "New employment provision in Chippenham should be seen as a priority. There is currently a shortage of suitable employment land for expansion of existing businesses to secure inward investment. This includes</p>

Full Name	Organisation Details	ID	Consultation Response
			<p>suitable workspaces for start up businesses and business units".</p> <p>The following large-scale existing employment sites remain unoccupied within Chippenham;</p> <ul style="list-style-type: none"> <li>• Hunters Moon - Approximately 10 hectares of employment land adjacent to Methuen Park.</li> <li>• Langley Park - Approximately a 20-hectare site of which 60% is unoccupied comprising vacant buildings and land adjacent to train station.</li> </ul> <p>Vacant commercial buildings are available at;</p> <ul style="list-style-type: none"> <li>• Methuen Park</li> <li>• Greenaway's Business Park</li> <li>• Bumpers Farm</li> <li>• Forest Gate</li> <li>• Various Town Centre sites</li> </ul> <p>Within the town centre there are over 20 vacant retail units including the following locations;</p> <ul style="list-style-type: none"> <li>• High Street</li> <li>• Emery Gate</li> <li>• Borough Parade</li> <li>• Station Hill</li> <li>• Market Place</li> <li>• New Road</li> </ul> <p>Whilst the existing employment site at Hunters Moon should be protected, and Langley Park regenerated for employment. It is recognised that there are specific requirements for large-scale employment sites that can be rapidly brought forward. These could be accommodated on the following sites;</p> <ul style="list-style-type: none"> <li>• Expansion of Kington Park - off the A429 North of Chippenham - Approximately 8 Hectares</li> <li>• "Phase 2 Bumpers Farm" Land off the A420 at Allington Bar Farm and Baileys Field - Approximately 15 hectares</li> <li>• Rawlins Farm - 6 Hectares</li> <li>• Land to the East of Chippenham - In excess of 30 Hectares</li> </ul> <p>The current employment allocation should be fully utilised and optimised before it has a change of use to residential as proposed at Hunters Moon and Langley Park. The potential remote employment sites proposed at Showells Farm and Landers Field should be</p>

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			<p>removed from the core strategy. Employers will require connectivity neither site achieves this. Large-scale industrial use can be achieved as described above. "Start up" business land should be utilised in a sustainable location next to the station and Wiltshire College - where joint skill sets can work in tandem.</p>
Sue Macdonald		<a href="#">1619</a>	<p>Southside Development (A350); development will cause added congestion, and the approach to the town will be spoilt &amp; no benefit to the town of Chippenham.</p>
S Thomas	Owner Positive Planning	<a href="#">2049</a>	<p>The development of large areas of greenfield sites around the town will result in urban sprawl which will have a negative impact on the town as an attractive place to live and work. Simply infilling within the existing road network removes greenfields and land of great amenity value, which are currently in close proximity to local residents for dog walking and leisure activities.</p> <p>These pockets of land are the lungs that allow the town to breathe. Very careful consideration will need to be given as to how this amenity value will be replaced and enhanced if the town is to remain attractive to live in.</p> <p>The contribution that the secondary schools make to the town has been overlooked. The Strategy gives mention to the fact that Sheldon and Hardenhuish are oversubscribed, but it does not recognise the contribution that these schools and their reputation has on the town. Building on this and improving educational achievement beyond the age of 16 through new learning centres and even a university would regenerate Chippenham.</p> <p>Positive planning for young people in Chippenham, particularly for teenagers and young adults should be integrated into the Chippenham Community Area Strategy.</p> <p>It is accepted that there will have to be some development on greenfield sites but such development must be of the highest design and layout standards. Within these areas, there should be detailed design briefs to create individual areas of character. Large uniform housing estates should be discouraged. Such development would be detrimental to the towns character and the landscape environment surrounding the town.</p> <p>Good design is an essential part of sustainable development and high quality design should be promoted for all development. The Core Strategy should set out the quality of development expected and ensure it reflects the character and identity of the local area.</p> <p>Developers should be expected to work closely with the local community to ensure their views are taken into account.</p> <p>Further options need to be considered for the sustainable development and growth of Chippenham. However, Option 2 would be favoured over Option 1, only because it allows for the housing development to be dispersed more widely by including land to the East of Chippenham and proposing a lower level of housing in the area of search to the SW of Chippenham.</p> <p>The development of the land to the SW of Chippenham in the Patterdown, Rowden, Showell and Hunters Moon Area for housing and</p>

Full Name	Organisation Details	ID	Consultation Response
			<p>employment is of particular concern. Such development would be;</p> <p>a)Unsustainable</p> <ul style="list-style-type: none"> <li>• This area is divorced from the town centre and station with limited public transport. It is too far to walk into the town, there is inadequate public transport, and there would be reliance on the car for short journeys which would not be sustainable.</li> <li>• This location is not sustainable in terms of access to schools and other facilities such as the library and leisure centre. The nearest secondary schools on the west side of the town, being Sheldon and Hardenhuish are acknowledged to be over subscribed. Abbeyfield school is not within a sustainable distance such that children would walk to school.</li> <li>• As Sheldon and Hardenhuish Secondary schools are already oversubscribed increasing the number of houses to the south west of the town will further increase demand for school places on that side of the town. If Abbeyfield has school places available or can be expanded, new residential development should be designated to the south-east of the town in closer proximity to that school.</li> <li>• It is not considered that the existing A350 has the capacity to accommodate the significant increases in traffic that the housing and employment sites would generate and traffic into the town via the A4 and Rowden Hill is already congested.</li> <li>• The A350 is single lane in both directions. The only stretch of dual carriageway is to the north of the town linking to the M4. This would be a more sustainable location for any employment development.</li> <li>• There should be a more balanced and sustainable approach to the location of employment land. The site at Showell is not sustainable. Employment land should be located to the north of the town closer to the M4. The A350 is dual carriageway to the north of the town, and this location would reduce the impact of high volumes of additional traffic that would be generated by a large employment site either driving through or bypassing the town.</li> </ul> <p>b)Damaging to the vitality and viability of the town centre</p> <ul style="list-style-type: none"> <li>• Development of the land to the SW of the town will not encourage the use of the town centre especially for general day to day shopping of food and household goods but will instead provide business for the existing out of town Sainsbury's at Cepen Park South. This is a large out of town retail outlet providing a complete range of food and non food items, including clothes and electrical goods, key cutting, shoe heeling and dry cleaning services as well as hot food takeaway, all with free unlimited car parking.</li> <li>• The proximity to Melksham via the A350 is also likely to provide a magnet for retail shopping with the large Asda, Lidl, Aldi, Sainsburys and Waitrose supermarkets as well as Leeks department store and Countrywide store.</li> </ul> <p>c)Detrimental to the character and appearance of Chippenham</p> <ul style="list-style-type: none"> <li>• The development of land to the SW of Chippenham in the Patterdown, Rowden, Showell and Hunters Moon Area would result in land of high environmental value being developed.</li> <li>• This land is designated as having landscape character, as well as much of it being a designated Conservation Area.</li> <li>• The A350 is a prominent route into and through the town. Development along this route will have a significant impact upon the appearance of the town along this approach. Designating a large employment site for business and industrial uses along</li> </ul>



Full Name	Organisation Details	ID	Consultation Response
			<p>such a prominent route is ill conceived and could harm the character and appearance of the local area and town as a whole.</p> <ul style="list-style-type: none"> <li>• Such largescale development in this location would obscure and disrupt the positive attributes of a farming landscape, featuring fields and hedgerows set in a sensitive landscape location in close proximity to the historic village of Lacock.</li> </ul> <p>d)Detrimental to the historic setting of Lacock undermining its attractiveness to visitors and tourists</p> <ul style="list-style-type: none"> <li>• The land to the SW of Chippenham is not only attractive farmland, it is also a cushion and buffer between the town and the historic village of Lacock. Such development may give rise to a negative impact on the village and its setting. This would be detrimental to the character and appearance of this historic village and would undermine its attractiveness for visitors and tourists many of whom may also visit Chippenham.</li> <li>• In line with the draft NPPF, the Council should be reaffirming protection for the historic environment and heritage of villages such as Lacock. Significant development of large areas for employment and housing in this location may cause substantial and irreparable harm to Lacock.</li> <li>• This land provides a strategic gap between Chippenham and Lacock and provides an important landscape role between open countryside and farmland and the built up area at the south western edge of Chippenham.</li> </ul> <p>4 Further Considerations</p> <p>Whilst it is not identified in the Core Strategy, consideration should be given to the location of employment sites to the north of the town in closer proximity to the M4 rather than to the SW of the town at Showell.</p> <p>Whilst it is not identified in the Core Strategy, consideration should be given to the location of residential or mixed use development on land to the south of Pewsham. This land is in closer proximity to the existing High Street and rail and bus stations compared to the land to the south-west of the town and Abbeyfield School has capacity and is not over subscribed as Sheldon and Hardenhuish schools are. This land is accessed by the existing Pewsham ring road as well as being well linked to the High Street.</p>
Paul and Kirsty Martin		<a href="#">2131</a>	<p>The consultation process is flawed.</p> <p>The housing and industrial development proposed to the South West of Chippenham is not actually part of the Chippenham Area but part of the Corsham Area - more specifically Corsham and Lacock parishes. The Consultation document only mentioned the development in the Chippenham area sections from 5.1 and not in the Corsham sections from 5.7. Anyone looking at the Corsham area sections alone would be totally reassured by such comments as: "Lacock village, a popular tourist destination" (5.7.1) and "Corsham has not been identified as a location for new strategic employment growth" (5.7.3).</p> <p>Core Policy 11 - Spatial Strategy: Corsham Community Area (page 74) says:</p>

Full Name	Organisation Details	ID	Consultation Response
			<p>"Development in the Corsham Community Area should be in accordance with the Settlement Strategy set out in Core Policy 1:</p> <p>Market Towns: Corsham</p> <p>Large Villages: Colerne and Box</p> <p>Small Villages: Gastard; Lacock; Neston; Rudloe and Westwells.</p> <p>3.3ha of employment land will be provided."</p> <p>This is totally untrue. The site at Showell, in Lacock parish, is for 28ha of industrial development/employment land.</p> <p>Core Policy 11 continues: "Over the plan period (2006-2026), 1200 new homes will be provided of which 1,050 should occur at Corsham. 150 homes will be provided within the rest of the community area. There will be no strategic housing or employment allocations in Corsham."</p> <p>This too is totally untrue: The Patterdown sites are in the Corsham area and a site of 1500 homes is clearly a strategic housing allocation.</p> <p>The council appears to have acknowledged the consultation was flawed. At a meeting in Lacock, on July 19 2011, Georgina Clampitt-Dix, Head of Spatial Planning, admitted it was an oversight.</p> <p>During the course of the evening Alistair Cunningham, Director of Economy and Enterprise, said that other options had been considered. Development at Showell and Patterdown was now the preferred option hence the consultation. He admitted there were still other options but these were not part of the consultation. How can a consultation be fair when only one option is on the table but others exist which can't be discussed?</p> <p>This view is shared by those in favour of development to the East of Chippenham.</p> <p>While admittedly an interested party Edward Heard, Managing Director of Chippenham 2020 LLP, asked Wiltshire Council's Cabinet on 24 May 2011 to include the original preferred option in the consultation. In a document ahead of the meeting he stated: "Given this is the final public consultation stage, before the preparation of the Pre-Submission Draft Core Strategy in the Autumn, Chippenham 2020 consider that the proposed consultation, as currently drafted, would seriously prejudice fair and open consideration of the East Chippenham development option." ( <a href="http://cms.wiltshire.gov.uk/mqConvert2PDF.aspx?ID=18614">http://cms.wiltshire.gov.uk/mqConvert2PDF.aspx?ID=18614</a> ).</p> <p>There is a distinct lack of clarity about what the consultation is actually about. Core Strategy 5 Options 1 and 2 contains maps (5.3) and (5.4) showing the proposed sites.</p>

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			<p>Both maps show exactly the same development area to the South West of Chippenham where two developers are actively interested. Option 1 is for 1,500 dwellings and Option 2 is for 800. Since the smaller site at Hunters Moon can accommodate 800 homes and the larger site several thousand it seems one or other site should have been the preferred option for Option 2 and the maps should reflect this.</p> <p>Map 5.3 is erroneous in the strategy document by missing the North East Chippenham employment land. A corrected map was put on the website but the faulty original document was not amended and remained throughout the consultation.</p> <p>Not only is the Map erroneous but fundamental documents are missing from the consultation section of the website where residents are invited to leave their comments. The Supporting Documents tab does not include or even signpost the fact there are a variety of topic papers full of information which have enable the Council to draw their conclusions. Without even knowing about these documents the lay-person is put at a significant disadvantage in coming to any kind of informed opinion.</p> <p>The inclusion of the new development area in the South West appears to have come about due to the responses from the earlier consultation which benefitted from discussion at several public meetings. The only public meeting which discussed the new Options 1 and 2 was not organised by the Council and was totally packed. It has not had the same amount of public scrutiny. On top of this the consultation period has run far into the holiday season which may mean many people may have been unaware of it and not been able to contribute. This consultation has run from June 16 to August 8 - a total of 54 days. The previous consultation ran from 30 October to 31 December 2009 - a total of 63 days.</p> <p>"The consultation included 4,000 direct consultees, including community groups, 17 exhibitions across Wiltshire and 15 workshops. In addition, we met with town and parish councils and documents were provided to elected Wiltshire councillors. We received a total of 2,192 individual responses from 678 respondents. The number of consultees, the broad range of organisations and individuals involved and their geographic spread across the county gives confidence that the results can be considered to be representative." (5.0 Executive Summary <i>Wiltshire 2026 Consultation Methodology and Output Report August 2010</i>).</p> <p>I don't think it is possible to say the same about this consultation.</p> <p>In summary:</p> <ol style="list-style-type: none"> <li>1 Residents in Corsham Area were not told of the scale of the development affecting them, in fact they were told the reverse, one might even say they were misled.</li> <li>2. The Council has other options on the table but the public can't discuss the alongside one another.</li> <li>3. The Chippenham Option 1 map (5.3) was wrong and not amended in the consultation document.</li> <li>4. The Chippenham Option 2 map (5.4) shows the same area being developed regardless of whether 850 or 1500 homes are to be</li> </ol>

Full Name	Organisation Details	ID	Consultation Response
			<p>built.</p> <p>5. Topic papers containing vital detail are not with Supporting Documents on the consultation part of the website despite their importance.</p> <p>6. The consultation period is shorter than the previous one, runs into the holiday period and was not accompanied by meetings organised by the council to explain the proposals.</p> <p>Not really a very fair consultation after all.</p>
Mr Stevan Usher	Director  Chippenham 2020	<a href="#">2184</a>	<p>I object strongly to any Expansion to the the South West Chippenham Area of Search as indicated in <b>Core Policy 5 - Spatial Strategy: Chippenham Community Area.</b></p> <p>None of these requirements are waited and in developing suitable locations they all need to be taken into account in providing a balanced approach to meeting the objectives.</p> <p>This has simply been ignored when identifying the Options and putting forward the South West as a viable proposition. Taking the relevant bullet points above the South West does not address any of these issues.</p> <ul style="list-style-type: none"> <li>• There is no connectivity with the River Avon the site is a significant distance away from the town centre and it does not provide sustainable transport routes for pedestrians and cyclists. The site is bounded by the busy A350 a railway line and one of the arterial routes into the town that is narrow and dangerous for pedestrians.</li> <li>• As with Cepan Park North and South this will be development placed on the outskirts of the town and will be serviced by out of town retail. There is no connectivity with town and development in this area will just be a repeat of the mistakes of the past</li> <li>• The only school with capacity and the ability to expand is Abbeyfield School to the East. Access from the South West is tortuous and would significantly add to the traffic congestion in the town at peak times</li> <li>• I have already stated in the points above that the South West is not well situated to provide good connectivity to the town centre it is equally difficult to access the station and Wiltshire College. Development in this area will simply exacerbate the current problems</li> <li>• The proposal to develop this area includes the provision for dueling the A350 from the Morrisons roundabout to Showells Farm roundabout. This is an extremely expensive construction for very little effect. It will not improve the congestion in the town without a further road to the south connecting to the Calne road. This is unrealistic and again would only provide limited benefit. The dueling of the A350 will simply provide further queuing capacity.</li> </ul> <p><b>Proposed Mixed-Use Allocations</b></p> <p><b>(iii) South West Chippenham - Patterdown, Rowden, Showell and Hunters Moon Area</b></p> <p>5.1.30 Clearly shows that the drivers for putting residential development in this area is to connect the proposed Showell Farm</p>

Full Name	Organisation Details	ID	Consultation Response
			<p>employment land . Currently this land is divorced from the settlement and to provide justification for its inclusion and integration with the existing settlement residential development can be used as infill. This is completely contrary to the objectives of the plan is short term and provides overwhelming weight to employment at the cost of all other objectives.</p> <p>Hunters Moon in this area is currently identified for employment under the existing plan and has remained so for some considerable time and has not been taken up. To allocate employment land at Showells Farm in substitution of Hunters Moon that currently exists and is better located is perverse.</p> <p>It goes on to require the development in this area should be fully integrated into the town and town centre including via the River Avon Corridor. This is simply not possible it has no relationship with either of these.</p> <p>In contrast to these options as part of the earlier RSS a comprehensive expansion to the East of Chippenham was proposed. This was identified as the “preferred option” and this is acknowledged in 5.1.16. The reasons that this is no longer considered an option is two fold</p> <p>1 “the proposed reduction in housing numbers” from the earlier RSS</p> <p>2 “focus on early delivery of employment land”</p> <p>As I have earlier pointed out the Strategic Housing Requirement methodology is flawed and will not stand up to independent scrutiny therefore item 1 will no longer form a bona fida reason for not considering a comprehensive Eastern Expansion. Early employment options are available to the North of the site as well as to the South where it adjoins the Calne Road</p> <p>From an Housing prospective the East to include New Leaze Farm and Hardens Farm is the only sustainable option to meet the objectives outlined earlier</p> <ul style="list-style-type: none"> <li>• It is immediately adjacent to the River and is easily integrated into the Town Centre. There is a green lung running alongside the river that connects the site directly into the town. This provides an excellent opportunity to provide public access by foot cycle or on the river. There is also an existing Sustran Cycle route from the site that leads to the station and Wiltshire College area.</li> <li>• There will be every incentive for future residents to use the town for there needs it is easily reached in a safe environment by foot 15 mins or by cycle 5 mins</li> <li>• Abbeyfields School forms part of the area and will provide a safe walk to school it will be properly integrated into the scheme and will be given room to expand if required</li> <li>• It is the only option that provides proper connectivity with the station and Wiltshire College being a short walk or cycle away</li> <li>• It will provide an Eastern Link road from Passage way to the Calne Road as a continuation of the road identified as part of the North East Chippenham proposal. The effect of this link road is significant in reducing the current traffic congestion within the town at peak times and will alleviate rat running in the surrounding villages.</li> </ul>

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			<p><b>Planning for new jobs and homes for Chippenham</b></p> <p>5.1.15 Outlines the Specific issues that should be addressed in planning for the Chippenham Community Area. There are 19 bullet points some relating to individual sites and requirements and others relating to the general principles of where development should be located. Taking Housing delivery as a requirement the principle issues that relate to this are as follows.</p> <p>I strongly oppose the development identified as option 1 and would support development in accordance with the table below.</p> <table border="1" data-bbox="564 462 1456 622"> <thead> <tr> <th>Site Allocation</th> <th>Employment</th> <th>No Dwellings</th> </tr> </thead> <tbody> <tr> <td>North East Chippenham</td> <td>2.5</td> <td>750</td> </tr> <tr> <td>South West Chippenham Area</td> <td>8</td> <td></td> </tr> <tr> <td>East Chippenham</td> <td>20 +</td> <td>Up to 2,845</td> </tr> </tbody> </table>	Site Allocation	Employment	No Dwellings	North East Chippenham	2.5	750	South West Chippenham Area	8		East Chippenham	20 +	Up to 2,845
Site Allocation	Employment	No Dwellings													
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Paul and Kirsty Martin		<a href="#">2137</a>	<p><i>Response to Part A - Please indicate which strategic option you would support and explain why?</i></p> <p>I object to both proposals. I also object that other options have been removed at this stage from the consultation and these totally new proposals have been introduced. Many of the council's own supporting documents show the options now on the table to be impractical and potentially undeliverable.</p> <p>My particular objections relate to the development of up to 1500 homes in South-West Chippenham and the industrial estate proposed for Showell.</p> <p>As explained in my answers to earlier questions I believe the development of major sites is wrong because the infrastructure is not there and the growth of the town is far from organic. In response to Question 1 I suggested an entirely different allocation of housing and employment land.</p> <p>There are a number of issues at fault with the Chippenham proposals.</p> <p>The first is in the definition of the phrase "sustainable development" which appears at frequent intervals throughout the consultation document without explanation. We are not helped by the fact that the government launched in July its <i>Draft National Planning Policy Framework: Consultation</i> which will decide how development in the future takes place and that despite comments at an earlier stage that sustainable development needed to be defined this has not occurred.</p> <p>The first encapsulating of the phrase was in 1987 when the United Nations released the <i>Our Common Future Report</i> ( known as the Bruntland Report) which included this definition: "Sustainable development is development that meets the needs of the present without compromising the ability of future generations to meet their own needs." ( <i>Our Common Future</i> (1987), Oxford: Oxford University Press.)</p>												

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			<p>Although this policy will be withdrawn following the introduction of the NPPF the Government introduced in 2005 <i>Planning Policy Statement 1: Delivering Sustainable Development</i>. This built on the Bruntland definition: "At the heart of sustainable development is the simple idea of ensuring a better quality of life for everyone, now and for future generations."</p> <p>Judging the development proposals in Chippenham I understand they may meet an identified need but in the round I do not believe they match the definition of sustainability because they will not, as they stand "ensure a better quality of live for everyone, now and for future generations." Core Policy 5 does not provide for education, transport need, forever removes greenfield sites, encourages out-commuting and does not address the fact that existing employment sites in Chippenham remain empty or undeveloped.</p> <p><b>Population:</b></p> <p><i>2.9 The level of population growth within Wiltshire has been above the national rate since 2001(Wiltshire including Swindon 4.1%, England 3.2%, 2001-2007). However, this has not been matched by growth in the younger working age population (age 20-39), which will have implications for the future employment base of the county. Alongside this, by 2026 the composition of the population is projected to change dramatically. There will be a higher proportion of the older age groups, including the over 85s. This part of the population is predicted to grow the fastest by 89.4% over the next 15 years, and it is also predicted that there will be double the number of older disabled people by 2026.</i></p> <p>Chippenham bucks the trend and for this reason rapid expansion should be reassessed. 21.7% of the population are aged 0-15; this is the highest proportion of children in the county after Tidworth and is higher than the Wiltshire average of 19.8% and almost 3% higher than the UK average of 18.9%. The proportion of people aged 60 and over is the second lowest in Wiltshire after Tidworth at 16.8% compared to the Wiltshire figure of 20.6% and UK average of 19%. If Tidworth, a garrison town comprising a disproportionately large military population and therefore inhabitants of working age, is removed from the equation Chippenham has the youngest population in Wiltshire (source: <a href="http://intelligencenetwork.org.uk/local-area-profiles/">intelligencenetwork.org.uk/local-area-profiles/</a> ).</p> <p>The strategy to deliver 4,500 new homes (5.1.7) means population growth on an unprecedented scale. The 2001 Census shows 36.3% of households in Wiltshire have one or more dependent children (source: <a href="http://intelligencenetwork.org.uk/population-and-census/">intelligencenetwork.org.uk/population-and-census/</a> ). The average number of children per household is 1.9%.</p> <p>When applied to the figures above and assuming most non-child households contain 2 people (allowing for those with adult children and other dependants counter-balancing those with single occupancy) this gives a projected population growth of 5,733 in adult-only households and 6370 in family households - a total of 12,103. This is an increase in the population of the Chippenham area of almost a quarter on the 2007 population figures and represents a trebling of the town's population over a period of 60 years without a trebling in infrastructure.</p> <p>The NOMIS figure for people in the North Wiltshire area claiming Job Seeker's Allowance is 2% in June 2011. This compares with 3.7% nationally. There does not appear to be a huge need for local employment development as things stand and this can be evidenced by the vast number of empty buildings around the town - of which more later.</p>

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			<p><b>Housing Need and the housing proposals</b></p> <p>It is important to consider the intentions of the developers since it is apparent the current proposals are constrained merely by the limits set by the Council and Redcliffe in particular, seems to have the ultimate intention of building many more over time.</p> <p>In the response to the 2009 consultation when the count of houses was set slightly higher than the existing on Redcliffe and Bloor both spelled out where they stood.</p> <p>Currently we are considering two options to the South West of Chippenham for either 850 or 1500 homes on two separate sites. Redcliffe in December 2009 in the document <i>Rowden Park, Chippenham, Alternative Strategic Site Report</i> said they wanted to build 2000+ homes. Bloor in their representation to the Wiltshire's Future Consultation said they wanted to build 800 homes. So the developers are proposing building housing in the long run of 2800+ in the South West of Chippenham.</p> <p>To put this in perspective Pewsham and the Cepen Park estates added 3,439 new houses so the eventual development in the South West could be massive.</p> <p>If the Council accepts Option 1 or Option 2 there will inevitably be additional pressure in future from Redcliffe to keep building.</p> <p>The whole strategy to build in the South West of Chippenham seems to be because the council is intent on developing Showell at all costs. Showell has appeared in every option thus far discussed.</p> <p>The rationale seems to be that Showell cannot be developed in isolation because it is not connected to the town. The council wants to develop Showell. Therefore the town must grow out to meet Showell. Is this a valid way of deciding planning policy?</p> <p><i>Topic Paper 14: Site Selection Process</i> discussing the suitability of Patterdown and Rowden as a site says: "Showell Farm is the largest known potential available site for employment in Chippenham. Evidence suggests that there is market interest in this site and that it could begin to be delivered in the first phase of the plan period, in advance of further housing development. However, although Showell Farm is conveniently located adjacent to the A350 road, it is divorced from the town centre. Therefore, to enable the area to be fully integrated with the town, it is felt that this site should be part of a sustainable urban extension to Chippenham."</p> <p>I would point out that taking the radius from the bridge at the bottom of Chippenham High Street to the furthest point of the Hunter's Moon site and scribing an arc it is apparent that this is way further than any point in the town and outside the range of the previously proposed development. In terms of sustainability development at Hunter's Moon is not really achievable.</p> <p>Another note on the site for Options 1 and 2 - connectivity and cohesion. The railway cuts through the site separating Hunters Moon from Showell and Patterdown. The only connecting feature is Queen's Bridge adjacent to Holywell House. This bridge is single lane for traffic with no footpath or means of safe transit for pedestrians. No new sense of community would grow between the two sites, access is dangerous for pedestrians and cyclists who might want to use the proposed country park. The bridge is battle-scarred thanks to regular bridge strike from lorries trying to access A350 south and with the Showell development this will increase. If the</p>



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			<p>object of the exercise is to get people living at Hunter's Moon working at Showell and not using their cars the council is much mistaken. There will need to be safe vehicular access and separate pedestrian/cycle access for there to be any cohesion between the sites.</p> <p>Much has been made of the biodiversity of other sites around Chippenham and I would contend the South-West sites are no different. The railway embankment which bisects the site offers a wildlife corridor for all manner of creatures. The fields surrounding the line are home to roe deer, muntjac, foxes, stoats, voles, moles, shrews, buzzards, kestrel, sparrowhawks, swallows, swifts, herons, mallard, ravens. bats, freshwater shrimp, owls of all types, glow worms and slow worms. There are even orchids and a colony of migrating toads which cross Saltersford Lane.</p> <p><b>Employment and Showell</b></p> <p>A quick internet property search for Chippenham (town not country) shows in excess of 164,000 sq ft of empty office space in Chippenham in 31 separate places varying in size from 239sq ft to 35,000sq ft which means there is already business space in the town to accommodate the smallest to largest businesses. This does not include 48,000 sq ft of mixed use space already available at Langley Park before further development there takes place. There appears to be some 800,000 sq ft available at Langley Park which can be developed for all uses.</p> <p>Some of the sites accounted for remain as yet undeveloped at and the figures above exclude a further large site at Methuen Park covering 3.2 acres.</p> <p>Current vacant industrial accommodation is 63535 sq ft but this could be increased dramatically by redesignating some of the undeveloped sites which are already brownfield. (Sources - Estates Gazette, Wilts Council agenda re Focus, Ashtenne and BNP Paribas - all accessed 2/8/2011).</p> <p>Appendix 6 of <i>Wiltshire Council's Workspace and Employment Land Strategy</i> looks at employment and development density assumptions. The 164,000sq ft of known empty and unbuilt office space in Chippenham is equivalent to 15,236sq m of space. The Appendix says office space averages 18.5sq m per employee. This means there is space for at least 823 people in offices already in Chippenham yet there is no-one using the space because the appropriate businesses have not been attracted to the town.</p> <p>The North Wiltshire Local Plan 2011 shows an allocation of 5ha of B1, B2 and B8 at Hunter's Moon along the edge of Easton Lane, behind Methuen Park and allowing for 5ha of development. This site remains undeveloped which suggests a lack of demand.</p> <p>We support the assertion in <i>Topic Paper 14: Site Selection Process</i> that Hunter's Moon be removed from employment provision because very little of the site is flat and suitable for large footprint buildings. This does not mean we support development at Showell either.</p> <p>Tucked away in <i>Topic Paper 14: Site Selection Process</i> is reference to suggestions from the earlier consultation that "M4 Junction 17 should be considered as an alternative strategic employment site to the strategic employment sites at Chippenham. Although this site</p>

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			<p>is located in the Chippenham Community Area, it is located 2.5 miles from Chippenham. The site would entail journeys from Chippenham, all of which could be avoided by siting such a development close to a town such as Chippenham. The delivery of a new employment site at Junction 17 would not take away the need to provide employment land at Chippenham itself."</p> <p>This is true but it ignores one very major consideration. The development earmarked for Showell is for industrial units. Industrial units and warehousing involve lorries. Since we know Herman Miller is one of the companies interested in Showell and they want to build a warehouse we can assume a lot of lorry movement down the A350 to Showell which is a the most southern tip of the A350 from the M4. We would contend the majority of the lorries visiting any development at Showell would be travelling along the M4. Warehouses employ relatively few people. The "damage" caused to the environment by a limited number of works travelling to a site near the M4 to work would be far less than if they out-commuted and would be more than offset by keeping the lorries away from a congested urban area.</p> <p>It is also incredibly naïve to assume that by building a huge housing estate all the new incumbents will want warehousing jobs. On that basis there will be commuters come what may from the south, west, north and east. Industrial estates generate traffic whether it is HGV, van or car. Providing buses will not reduce traffic. Development at the furthest reach of Chippenham on a site larger than Bumper's Farm will cause trouble as anyone who has observed Bumper's Farm in the rush hour will testify. If Redcliffe's proposals for a new road from Pewsham connecting to the Melksham Road at Showell come to pass the problem will be further exacerbated and life will be impossible for those living there.</p> <p>The land at Showell Farm has already been turned down by an inspector, on the basis of non-compatibility with PPG13. Its inclusion again is developer-driven rather than policy driven and at the inquiry Wiltshire County Council strongly objected to Showell being developed. Nothing has changed.</p> <p>Developing Showell and putting warehousing and industrial units there would make an unsightly gateway on the approach to Chippenham and is totally at odds with the approach to Lackham immediately across the roundabout. Development would be damaging to the countryside and the setting of Chippenham and totally inappropriate for the area around the Grade II listed properties there.</p> <p>No development at Showell should be permitted. No more greenfields should be compromised until Langley Park and the other brownfield sites in the town are exhausted.</p> <p>I would invite Wiltshire Council to do a full audit of available sites and review the proposed allocations.</p> <p><b>Housing, employment and the out-commuting argument</b></p> <p><i>4.3 The strategy seeks to deliver the most sustainable level of growth, which does not exacerbate commuting, encourages a greater level of self containment and does not negatively impact on Wiltshire's exceptional environmental quality.</i></p> <p><i>5.1.9 To enable the delivery of job growth, new attractive employment sites should form part of mixed use urban extensions,</i></p>

Full Name	Organisation Details	ID	Consultation Response
			<p><i>incorporating housing, that are well integrated with the town. The proposed level of new homes is considered reasonable as it supports job growth in line with that across Wiltshire and will not lead to the exacerbation of out-commuting levels.</i></p> <p>It seems a totally flawed concept that building more and more homes in the Chippenham area will reduce out-commuting. One of Chippenham's selling points is that it is close to the M4 and has a mainline station. The planned electrification of the line to London will reduce commuting times both east and west making Chippenham even more attractive as a commuting dormitory town.</p> <p>The adopted <i>Wiltshire Structure Plan 2016</i> which this plan seeks to replace acknowledges that out-commuting is increasing: "2.10 In spite of the contrasts in their economic fortunes, both North and West Wiltshire Districts experienced significant increases in net out-commuting between 1991 and 2001. In the case of North Wiltshire, however, the District's location, in addition to benefiting economic growth, also provides ready access to employment opportunities in Bath and Swindon, in addition to Bristol, where the number of jobs in the "North Fringe" increased greatly in the 1990s. It is against this background of an increase in jobs within the "commuting hinterland" of the District, together with the high rate of housing completions, particularly at Chippenham, that net out-commuting from the District increased from around 6,800 in 1991, to around 9,200 in 2001," (source: <a href="http://wiltshire.gov.uk/wiltshire-structure-plan-2016-adopted-version.pdf">wiltshire.gov.uk/wiltshire-structure-plan-2016-adopted-version.pdf</a> )</p> <p>The population of Chippenham in 1991 was 25, 376 in 2001 it was 28,065. During this period there was a huge house-building programme in Chippenham at Cepen Park South and Cepen Park North as well as infill at Monkton Park.</p> <p>Out-commuting from 1991-2001 increased by 2400. The population increased by 2689. So the net gain for the population for all that house-building was 289 of whom all must have been children.</p> <p>What evidence is there to suggest a house-building programme of 4000 will reduce out-commuting? Wiltshire Council has provided none and it is a ridiculous notion to suggest that with major cities readily accessible by car and train that the picture will be any different.</p> <p>The developers for the South West of Chippenham site will undoubtedly use the location as a selling point to commuters.</p> <p>Bloor Homes, who are hoping to develop Hunters Moon, say in their advertising for The Gateway development at Melksham: "It is excellently positioned for superb road and rail links. Easy motorway access via the M4 leads to major cities, including London, Bristol, Swindon and Oxford. Benefits from good access for the A350 and is just ten miles from Junction 17 of the M4 Motorway," (source: <a href="http://bloorhomes.com/developments/the-gateway">bloorhomes.com/developments/the-gateway</a>).</p> <p>Redcliffe Homes in their marketing for Brooklands in Chippenham and close to their proposed new development site point out: "Close to the bustling town centre of Chippenham and with easy reach of Bath and Bristol," (source: <a href="http://redcliffehomes.co.uk/index.php?id=168">redcliffehomes.co.uk/index.php?id=168</a>).</p> <p>Neither company mentions local employment by employer name or by potential opportunity.</p>

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			<p>The Highways Agency also predicts a rise in out-commuting. In the Draft topic paper <i>Wiltshire Core Strategy - Consultation June 2011 Community Area Infrastructure Profiles - 12: Infrastructure Appendix 2</i> which contains comments from various agencies about the earlier proposals before the South-West proposals were first raised:</p> <p>"1.17 The Highways Agency raised concerns about the eastern site, which is included in both the Preferred Option and Option 2, because of the problem of out-commuting to Junction 16 of the M4. Out-commuting is likely to increase via the M4 for any development around Chippenham; however development on the proposed northern and eastern urban extensions would most contribute to this effect. The proximity of the M4 would make these sites popular with commuters travelling to Swindon and the east of Bristol and the west. An increase in car traffic would therefore be likely."</p> <p>I would contend the same is true of the new South-West development because of it's proximity to the A350.</p> <p><i>Response to Part B - Are there additional infrastructure requirements needed to support development in Chippenham Community Area?</i></p> <p>Without major infrastructure improvements which are not apparent in the options on the table Chippenham will not cope with development on the scale proposed.</p> <p><b>Education</b></p> <p>5.1.5 of the consultation document says: "Hardenhuish and Sheldon Secondary Schools are oversubscribed. Abbeyfield School has spare capacity and in the short term could accommodate some additional school places. Further work is required to assess the need for a new secondary school or the expansion of Abbeyfield School over the plan period to 2026."</p> <p>Using data from the 2001 census we have calculated that the larger proposed housing development would mean approximately 1000 more school children in the area. The plans do not seem to include an additional primary school and secondary school children would have to be transported across town to Abbeyfield in transport provided by the council because it exceeds the three mile rule or to Corsham. There will not be space in Sheldon or Hardenhuish for children living on the estate because of the distance tie-breaker both schools use.</p> <p>To exacerbate the problem the development at the North East of Chippenham will bring 750 homes so roughly half the number of children again. Because of it's proximity to Hardenhuish and Sheldon children living there will get priority to those schools on distance over the heads of children in Cepen Park South. This means the secondary school required to accommodate a southern development would have to factor in a large number of children from that area as well and potentially from other areas along the route of the A4.</p> <p>At the consultation in Lacock we were told there were no plans to build west of the A350 - if this is the case where would a secondary school to serve the needs of the children on the South West development site be built or would the county opt to expand Abbeyfield. This is not incorporated anywhere in the policy. A site of equivalent size to Abbeyfield's 27 acres would be needed as a minimum.</p>

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			<p>It is not true that Abbeyfield as it stands can take up much of the slack. This September the school will have 61 spare places in year 7 but that is due to a fall this year in the age group. This situation remains for the next couple of years before the numbers bounce back up again. Abbeyfield was built as a PFI so it does not have the ability to readily add extra classes here and there without renegotiating so it should not be presumed there is any elasticity in the PAN.</p> <table border="1" data-bbox="573 360 1704 571"> <thead> <tr> <th colspan="4">Chippenham and Corsham Schools Admissions 2011</th> </tr> <tr> <th></th> <th>PAN</th> <th>Admissions</th> <th>Unsuccessful</th> </tr> </thead> <tbody> <tr> <td>Sheldon</td> <td>280</td> <td>279</td> <td>34</td> </tr> <tr> <td>Hardenhuish</td> <td>234</td> <td>238</td> <td>9</td> </tr> <tr> <td>Abbeyfield</td> <td>180</td> <td>119</td> <td></td> </tr> <tr> <td>Corsham</td> <td>230</td> <td>215</td> <td></td> </tr> </tbody> </table> <p style="text-align: right;">Source: <a href="http://php.wiltshire.gov.uk/dirschool">http://php.wiltshire.gov.uk/dirschool</a></p> <p>In the Draft topic paper <i>Wiltshire Core Strategy - Consultation June 2011 Community Area Infrastructure Profiles - 12: Infrastructure Appendix 2</i> which contains comments from various agencies about the earlier proposals before the South-West proposals were first raised the Local Education Authority support the need to include planning for a new school:</p> <p>"1.67 For 3000 new houses, there would be a real debate about the need for a new secondary school. Modelling will need to be carried out to assess the need for a new secondary school. The reserve position is to require a site for a new secondary school. The council's Strategic Property Service should be made aware of the need to keep some space around Abbeyfield as space for expansion.</p> <p>1.68 For primary schools, three new two forms of entry (2FE) primary schools would be required in the main housing area and one new one form of entry (1FE) primary school in the northern area, with financial contributions for the infill development.</p> <p>1.69 The Preferred Option* is preferred by the Local Education Authority."</p> <p>* this was the original Eastern development site.</p> <p>If new primary and secondary schools are not built at the same time as any of the developments in Chippenham then there will be chaos. There is a very real risk that many children will not have school places at all and that those who do will find themselves being transported backwards and forwards at the council's expense for many years to come. Apart from the obvious infrastructure issues this is not an ideal situation when children are moving to the area and need to build social bonds and a sense of community where they are living.</p> <p><b>Traffic and roads</b></p> <p>The A4 running through Chippenham is already running pretty much to capacity and there are frequent traffic jams especially in the</p>	Chippenham and Corsham Schools Admissions 2011					PAN	Admissions	Unsuccessful	Sheldon	280	279	34	Hardenhuish	234	238	9	Abbeyfield	180	119		Corsham	230	215	
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			<p>area between the A350 and the Rowden roundabout and around the notorious Bridge Centre. The situation will inevitably deteriorate if building to the South West is permitted.</p> <p>On 1 March 2010 the Chippenham Area Board considered traffic problems at the junction of Lowden and Rowden Hill on the A4 and very close to potential exits from the proposed development. They heard that data acquired from Wiltshire Police taken over a 7 day period indicate an average annual daily flow of 21,000 vehicles on the A4 Rowden Hill / Bath Road.</p> <p>Since then Redcliffe's initial Brooklands housing development of 43 homes close to the Rowden roundabout has brought additional cars.</p> <p>Additional development in the area will make vehicle movements far greater.</p> <p>The 2001 census shows the average car ownership per household was 1.36.</p> <p>Therefore:</p> <p>1500 homes = 2040 more cars/vans - if every vehicle makes just one journey out and back that is 4080 movements onto the A4</p> <p>800 homes = 1088 more cars/vans - if every vehicle makes just one journey out and back that is 2176 movements onto the A4</p> <p>The developers acknowledge this is a problem. The Chippenham Vision bulletin for July 2011 says: "Redcliffe has undertaken some more detailed traffic modelling. In particular the issue of whether development in this area would relieve traffic pressure from the town centre was raised. It would appear that without a connection between Pewsham and the A350 this is unlikely."</p> <p>While developers in the North-East and East of Chippenham are incorporating building new roads no such road is proposed in the South West options offered for consultation.</p> <p>The road situation gets even worse when the 28.85ha industrial development is considered. It is anticipated a lot of this will be for warehousing with all the attendant HGV movements that would come with it. Lorry and staff traffic would increase on the A350 from the M4 in one direction and Melksham in the other. Without any Pewsham/A350 bypass extension traffic from the east will have to navigate the Bridge Centre and A4 London Road before turning off at the mini-roundabout at Rowden and down what is currently a minor road at Patterdown.</p> <p>In the original consultation the local Highways Authority showed that peripheral areas of the town scored very low in terms of accessibility, bus connectivity, highway capacity, journey to work, access to a railway station and rail connectivity. The results are in the <i>Wiltshire Strategic Transport Assessment</i>.</p>

Full Name	Organisation Details	ID	Consultation Response																																																												
			<table border="1"> <thead> <tr> <th>Area</th> <th>Access</th> <th>Bus Connectivity</th> <th>Rail Station</th> <th>Rail Connectivity</th> <th>Highway Capacity</th> <th>Journey to work</th> <th>Total</th> <th>Rank in Chipp.</th> </tr> </thead> <tbody> <tr> <td>H</td> <td>8</td> <td>0</td> <td>5</td> <td>6</td> <td>2</td> <td>10</td> <td>31</td> <td>12</td> </tr> <tr> <td>I</td> <td>9</td> <td>0</td> <td>5</td> <td>6</td> <td>4</td> <td>9</td> <td>33</td> <td>4=</td> </tr> <tr> <td>L</td> <td>8</td> <td>3</td> <td>5</td> <td>6</td> <td>3</td> <td>9</td> <td>34</td> <td>2=</td> </tr> <tr> <td>K</td> <td>8</td> <td>0</td> <td>5</td> <td>6</td> <td>3</td> <td>11</td> <td>33</td> <td>4=</td> </tr> </tbody> </table>	Area	Access	Bus Connectivity	Rail Station	Rail Connectivity	Highway Capacity	Journey to work	Total	Rank in Chipp.	H	8	0	5	6	2	10	31	12	I	9	0	5	6	4	9	33	4=	L	8	3	5	6	3	9	34	2=	K	8	0	5	6	3	11	33	4=															
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<p data-bbox="1019 443 1691 475" style="text-align: center;"><i>Abstract from results of WSTA shows key southern sites.</i></p> <p data-bbox="560 512 2152 667">The Local Highways Authority has produced a traffic model for Chippenham and scenario testing has been carried out using this model. This indicated that an increase in the number of journeys in Chippenham would be likely to lead to the A350 road to the west of Chippenham becoming increasingly congested. In turn, this is likely to lead to an increase in the number of journeys on less suitable roads. Improvements to the A350 would be required (source: <i>Wiltshire Core Strategy - Consultation June 2011 Community Area Infrastructure Profiles - 12: Infrastructure Appendix 2</i> )</p> <p data-bbox="560 703 2152 762">Resolution of significant congestion and safety problems along the Chippenham Western Bypass (A350) was identified as an essential infrastructure requirement for Chippenham. There is no apparent funding currently available for this.</p> <p data-bbox="560 799 2152 858">Any development at Showell and either employment or housing at Hunter's Moon and additional housing at Patterdown and Rowden will clearly exacerbate problems on the A350.</p> <p data-bbox="560 895 734 927"><b>Town Centre</b></p> <p data-bbox="560 963 2152 1023">Chippenham town centre is nothing short of a disaster. There are numerous empty shops, the units are too small to attract national retailers.</p> <p data-bbox="560 1059 2152 1150">The site of Woolworths at the heart of the High Street was broken up to allow yet another coffee shop and a pound shop. While Waitrose is to be welcomed its arrival resulted in the downsizing of the anchor store in Borough Parade. Where once we had a small Co-Op departments store we now have Wilkinson's.</p> <p data-bbox="560 1187 2152 1278">The market is terrible - only a few stalls on average. The Council has also decided to further kill of the High Street with the introduction of vastly inflated parking prices. A few months ago shoppers faced frustrating queues while they hunted for parking spaces. Today the reverse is true and there are countless parking spaces available throughout the town.</p> <p data-bbox="560 1315 2152 1437">Until the centre of Chippenham is enhanced there is little point in rapidly expanding the perimeter of the town. With no shops, no cultural centre and a decaying cinema a sense of community cannot be engendered and those encouraged to move to the town will use it as a staging-post. Chippenham will just be a larger dormitory town than it already is and businesses will not be encouraged to move here because there simply is not enough of a package on offer to them.</p>																																																															

Full Name	Organisation Details	ID	Consultation Response
			[images to accompany this comment attached]
Unknown	Bloor Homes	<a href="#">2405</a>	<p>We note that both options for the location of future growth in Chippenham rightly include the land at Hunters Moon (and for that matter Abbeyfield school) as sites for housing and community uses within the areas of search. Both sites were examined at the North Wiltshire Local Plan 2011 inquiry in 2005 and the Inspector concluded that they were suitable for development. Therefore, if the Council were to consider development sites within the areas of search, clearly these two sites should be allocated to come forward first. Obviously, additional land will also be required to meet the need for housing, but we do not comment of the suitability of other sites. Additional sites for housing will need to be considered by the Council and tested separately, as the Hunters Moon and Abbeyfield School sites were already tested at the previous Local Plan inquiry.</p> <p>In relation to Hunters Moon, the Local Plan Inspector, considering the use of the whole site for housing and employment, commented:</p> <p>“I accept that the area is not constrained in terms of agricultural quality. Nor is it of significant landscape quality and it is not an area of environmental protection. Its development would not have a significant effect on the landscape of the area or the setting of the town, subject to the small hill at the centre of the area remaining undeveloped.”</p> <p>(para 10.106)</p> <p>“However, having regard to the availability of employment and housing land within the town and the allocations made within the RDDLP, to allocate the extensive objection site for mixed use development at the present time could result in the Structure Plan requirements being exceeded. Consequently, while I recognise the development potential of the Hunters Moon area, I consider the allocations made in the RDDLP to be appropriate and no additional land in the area should be allocated for development at the present time.”</p> <p>(para 10.107)</p> <p>The Inspector was therefore satisfied that the site was suitable for mixed use development, acknowledging that it had few constraints to development, but considered that there was no need for the site at the time.</p> <p>Since the Local Plan inquiry, Bloor Homes has promoted the site for solely residential use which we consider is more appropriate. The context has changed significantly since the Local Plan Inquiry and the draft Core Strategy demonstrates that there is now an immediate need for housing sites.</p> <p>Bloor Homes and its consultants have prepared a Draft Concept Statement for Hunters Moon which is provided with these representations. The Statement supports the allocation of the site for housing and demonstrates the opportunity to deliver a sustainable and integrated development on the south western edge of Chippenham. It illustrates that the site is available for early development.</p> <p>The Concept Statement includes an initial masterplan which illustrates the potential for the site to deliver up to 650 dwellings, with a new primary school, community facilities and associated green infrastructure. The site can therefore make a significant early</p>



Full Name	Organisation Details	ID	Consultation Response
			<p>contribution towards the housing trajectory for Chippenham. The principal access will be through Methuen Park with secondary points of access onto Easton Lane and Salterford Lane.</p> <p>The development can also link into development east of Salterford Lane (subject of separate representations) which is illustrated by the Draft Concept Statement. The proposals are complementary, but can come forward independently.</p> <p>The Hunters Moon site is extremely well located to employment opportunities on Methuen Park. If, as proposed by the draft Core Strategy, Showell Farm is developed for employment use this will also be very conveniently located. Thus the site would be between two large employment areas and in keeping with a key objective of the draft Core Strategy to promote sustainable development and reduce commuting.</p> <p>The conclusions of the Local Plan Inspector and the location of Hunters Moon in relation to the existing settlement support the site coming forward for development before any other sites in the area of search for either option in the draft Core Strategy. The Hunters Moon site does not depend on the development of any other land to come forward. The development of Hunters Moon would not prejudice other sites within the area of search coming forward.</p> <p>We fundamentally object to the phasing mechanism proposed and believe it is unnecessary and unreasonable. It conflicts with the objective stated elsewhere of providing appropriate levels of new housing. The plan should remove any reference to phasing in respect of either certain periods of the plan or completion of the strategic employment site - there is no reasonable justification to either element.</p>
Claire Pratley		<a href="#">2501</a>	The traffic around Hunters Moon is already quite bad enough. If you were to build more house here, it would increase. You need to make it easier to get aaround the town, not harder - why not a link road to the east?

**SCHEDULE OF COMMENTS MAKING REFERENCE TO HUNTERS MOON SITE AT CHIPPENHAM, RECEIVED DURING CONSULTATION ON WILTSHIRE CORE STRATEGY PRE-SUBMISSION DOCUMENT, FEBRUARY 2012**

<b>Comment ID:</b>	1684	<b>Consultee</b> Unknown Bloor Homes	<b>Agent</b> Jonathan Porter Barton Willmore	<b>Person ID:</b> 556573 556577	<b>Is the DPD legally compliant?</b>	No
<b>Comment point</b>	4 Delivering the vision - the spatial strategy for Wiltshire Policy Spatial Strategy		<b>Oral participation?</b>	Yes	<b>Is the DPD sound?</b>	Consistent with national policy
<b>Reasons for not legally compliant</b>						
<b>What change(s) are necessary to make the DPD legally compliant?</b>						
<b>Reasons for not sound</b>	<p>1.1 These representations are submitted on behalf of Bloor Homes Ltd. The company owns and controls the site known as Hunters Moon, Chippenham.</p> <p>1.2 In accordance with our client's previous representations on the emerging Core Strategy, Bloor Homes Ltd maintains that the Hunters Moon site represents the most appropriate location to deliver a significant number of new homes for Chippenham in the short term. This fact has been established for some time and is recorded in the inspector's findings at the review of the last Local Plan and the previous draft of the Core Strategy.</p> <p>1.3 In producing the Pre-Submission Core Strategy, the Council has placed an undue bias on the concept of a "jobs first" approach. The Core Strategy and spatial strategy for Chippenham is therefore skewed in favour of residential allocations which include areas for employment, at the expense of other strategic priorities. This approach of linking residential and employment areas to try to bring forward jobs is artificial and naïve:</p> <ul style="list-style-type: none"> <li>•It is artificial because there is no need to link employment and residential land allocations - the two land uses can be considered separately and can come forward independently.</li> <li>•It is naïve because in reality the linking of employment sites to residential allocations will do nothing to bring forward the delivery of employment land.</li> </ul> <p>1.4 We are concerned that the selection of strategic sites in Chippenham is flawed and is not based on a balanced assessment of the evidence. We also question whether the large proposed strategic allocations are deliverable in accordance with the Council's housing trajectory, which could lead to the Core Strategy being found unsound.</p> <p>1.5 Our Concept Statement for the Hunters Moon site that was submitted with our representations on the previous draft Core Strategy has been updated to include additional options for the development of the site in light of comments received from officers and to include options to illustrate how an element of employment use could be provided. The options illustrate that Hunters Moon and the land north of Saltersford Lane could deliver between 500-725 dwellings with a primary school and up to 4 ha of employment land (including circa 100 dwellings on the Saltersford Lane site).</p>					

1.6 In these representations we will refer to the background to the identification of the land for development and explain why it remains the most appropriate solution to deliver the required level of new homes for Chippenham and north Wiltshire.

## 2.0 SPATIAL STRATEGY FOR WILTSHIRE

2.1 The Pre-Submission Core Strategy has been published in a transitory period for national planning policy and makes only passing reference to the draft National Planning Policy Framework (NPPF). Clearly now that the NPPF has been published it will be necessary for the Council to undertake a review of the published Core Strategy and make changes where necessary to ensure that it is consistent with national policy. This could require a further period of consultation on the changes or a revised Pre-Submission Core Strategy. Further the avoidance of doubt, these representations were drafted before the final revision of the NPPF was published within the final days of the consultation period and we therefore trust we will be given a further opportunity to comment on its implication.

2.2 It is evident from the Key Challenges and Strategic Objectives that the Council has drafted the Core Strategy with a strong emphasis on delivering employment land and the aim to deliver "jobs first".

2.3 Paragraph 2.7 of the Core Strategy states that:

"Reducing levels of out commuting from many of Wiltshire's settlements is perhaps the most important strategic challenge in planning for the future of Wiltshire."

2.4 Employment is just one of a number of important factors which need to be balanced when preparing a development plan for the County and it should not be promoted at the expense of other strategic priorities such as sustainability, providing new homes, and protecting and enhancing the natural, historic and built environment.

2.5 We recognise the merits of aiming to phase employment and infrastructure delivery alongside future housing provision. However, employment and housing markets are not intrinsically linked and the exact timing of the delivery of employment sites should not unduly delay the prompt delivery of much needed housing. The Core Strategy should be drafted more positively and recognise the benefits that new housing can deliver in terms of the government's pro-growth agenda.

2.6 The March 2011 ministerial statement 'Planning for Growth' emphasises the role of new housing development in promoting economic growth. The availability of good quality and affordable housing will encourage young people to choose to stay to live and work in the area to support new business.

2.7 The RS continues to be a material consideration being founded on a robust evidence base. The Council's decision to plan for "at least 37,000" rather than the higher figure in the RS places even greater importance on ensuring the practical delivery of that target. Every effort should be made in ensuring that the plan's policies are capable of delivering at least that minimum target. There is a greater need to scrutinise the detail of the plan's housing trajectory and policies to ensure they are capable of meeting that minimum requirement.

2.8 Through the National Planning Policy Framework the Government has confirmed the need for local authorities to facilitate appropriate levels of development for growth.

2.9 Localism encourages local decision making based on a robust evidence base. It does not mean ignoring wider sub-regional or regional components of growth planning for a lower level of economic growth.

2.10 The errata to the Annual Monitoring Report 2010-11 provides the amended housing land supply figures for North Wiltshire. In relation to the housing requirement proposed by the Core Strategy Table 1 indicates 5.8 years of deliverable supply. Table 2 compares the housing land supply with the requirement of the Proposed Changes of the RS and indicates 3.2 years for Chippenham. This illustrates the marginal nature of the proposed housing land supply compared to need.

2.11 We support the recognition in the proposed settlement strategy set out in Core Policy 1 of Chippenham as a Principal Settlement and a primary focus for growth. This is entirely appropriate given its excellent transport links and role as a strategic employment location in Wiltshire.

2.12 We note that Core Policy 2 Delivery Strategy identifies Showell Farm as an independent employment site of 18 hectares. This is consistent with the Wiltshire Workspace and Employment Land Study (July 2009) and the statement by the developer that the site is attractive to the market

	and deliverable. We address this point further in relation to the Chippenham Area Strategy.
<b>What change(s) are necessary to make the DPD sound?</b>	
<b>Other comments</b>	
<b>Reasons for oral participation</b>	We consider the scope and implications of our representations warrant participation at the Examination.
<b>Attachments</b>	2167519_0_1.pdf 2167581_0_1.pdf

<b>Comment ID:</b>	613	<b>Consultee</b> Mr Tim Baker Strategic Land Partnerships	<b>Agent</b> Mr John Baker Peter Brett Associates	<b>Person ID:</b> 644492 556318	<b>Is the DPD legally compliant?</b>  <b>Is the DPD sound?</b>	No  No
<b>Comment point</b>	Core Policy 2: Delivery strategy Policy 2		<b>Oral participation?</b>	Yes	<b>Reasons for unsound</b>	Justified  Effective  Consistent with national policy
<b>Reasons for not legally compliant</b>	<p>Strategic Development Sites</p> <p>The policy should be explicit about how additional sites should be brought forward. It is currently worded that additional sites might be appropriate where they are brought forward through the community neighbourhood planning process, and address the specific community area issues identified. While this approach is supported in principle we have major concerns about how this will be managed and it is not clear what the role of the site allocations DPD is in this process.</p> <p>In addition the policy is poorly worded so that it does not make sense and is very difficult to interpret. Specifically the policy refers to development within the defined limits of development and then proceeds to talk about development outside them. The strategic sites are listed but these are in alphabetical order rather than by settlement which does not aid the understanding of how they contribute to the requirement.</p> <p>The strategic site at South West Chippenham is not included in the list, despite being a Strategic Site, which is included in CP10 and referred to in Appendix A. It would appear that it is being referred to in this policy as Showell Farm and only for employment. This contradicts what is elsewhere in the plan and needs rectifying, the accurate area included together with the right land uses and name.</p> <p>There is also a difference between the total numbers from the sites listed in policy CP2 and table 5.4 in the Chippenham area section.</p> <p>The selection of sites in Chippenham has been complicated by considerable change in views of the planning department on the various sites. Tracing the history of the various options around the town demonstrates the contradictions that exist in this site selection process.</p> <p>The Local Plan Inspector identified the site as a suitable location for development and recognised that it was the best site to be brought forward if necessary. Wiltshire 2026 consultation in 2009 opted for the preferred strategic sites to be a much larger site at land east of Chippenham and nothing to south. The land now allocated at the south west was previously dismissed in Wiltshire 2026 strategic sites background paper 2009 because "The land contains grade 1 agricultural land, is in a Minerals Safeguarding Area and is affected by a buffer zone for the sewage works. The smaller sites would be isolated without wider development taking place in the area."</p> <p>However, this position changed and a larger site for the whole of the south west area was contained in the Sept 2011 consultation (both in options 1 and 2), although option 2 covered a smaller land area because it also included an area to the east of the town. Justification for its inclusion in 2011 seems to be that the Showell Farm employment site is a key site and can be delivered quickly, in order to link this to the Town Centre a sustainable urban extension should be proposed, and an area of search was proposed.</p> <p>The previous proposals in Wiltshire 2026 identified 5,740 homes for the Community Area as a whole, of which 5,230 were proposed at Chippenham itself. This appears not to have been supported through the consultation event. The Topic Paper 15 refers to the examination of a number of population projection scenarios at a special Area Board meeting to determine what an appropriate figure might be. However, these scenarios are not explained in the documentation and there is no evidence based justification provided for the revised figure of 4,000 new homes, other than the consultation results that demonstrated objection to a high figure.</p> <p>In the current proposal the strategic site has now been reduced in size and excludes Saltersford Lane site (indicated by a red circle on the map below) as well as the wider Hunters Moon area. Topic paper 14 at page 59 justifies this approach in terms of "the reduced housing requirement for Chippenham means that the entire site is not required". It is not agreed that this is the case (see separate comments on housing requirement) because there is no justification for a reduced level. As a consequence of requiring more dwellings across Wiltshire, further land will be required at Chippenham, because it is such an important strategic settlement. The Saltersford Lane site and wider Hunters Moon area has previously been recognised as a suitable site and should now be recognised by the Core Strategy as providing important housing able to be delivered in the short</p>					

	<p>term. This could either be by including it as part of the South West Chippenham strategic site, and including it accurately in the list in the policy, or by recognising it as a separate deliverable site which makes an important contribution to short term housing delivery to support the Showell Farm employment allocation.</p> <p>This site at Saltersford Lane is capable of being developed on its own or in conjunction with the wider area known as Hunters Moon for residential development to would provide a comprehensive development adjacent to the settlement in the most sustainable location. Bloor Homes are pursuing an adjacent site and representations on the larger site have been submitted on behalf of Bloor Homes and SLP. Both the smaller site and the larger site could be developed either separately or together as a sustainable and deliverable development to complement the employment strategy for Chippenham.</p> <p>This site is on the edge of Chippenham and is well served by local facilities and bus services. It is adjacent to an employment site and other employment opportunities. It is within 0.5m of retail facilities including a supermarket, a nursery and a bus stop which provides regular half hourly services to Chippenham Town Centre, Bath and Corsham. It is also within 1mile of health facilities including Chippenham Community Hospital, a variety of schools and community facilities. The site has previously had permission for employment uses, however, this has not be renewed. Its use for housing would support the existing employment uses and allocations in the area and would provide a genuinely sustainable and deliverable site. There are also no unusual constraints or infrastructure requirements which threaten the short term delivery of these sites.</p> <p>Saltersford Lane site to be included within Core Strategy as a deliverable housing site</p>
<b>What change(s) are necessary to make the DPD legally compliant?</b>	<p>The site at Saltersford Lane, Chippenham either with or without the wider Hunters Moon area should be recognised as a sustainable and deliverable site. It should be specifically included within the policies of the Core Strategy. This could be by it being made clear that land west of the railway and east and west of Saltersford Lane is included it within the strategic site 'South West of Chippenham' which in turn must be included and within the list in policy CP2 (it does not currently appear which is assumed to be a simple error), with the level of dwellings indicated as at least 1300, and / or by identifying it separately as a strategic site or as a non-strategic site through policy CP10.</p> <p>Please see representations on Policy CP10.</p>
<b>Reasons for not sound</b>	
<b>What change(s) are necessary to make the DPD sound?</b>	
<b>Other comments</b>	
<b>Reasons for oral participation</b>	<p>The issues involved in the consideration of strategic sites is fundamentally linked to the housing requirement and goes to the heart of the spatial strategy and are best dealt with through discussion with a range of parties involved. Further evidence may become available which should be shared through the examination.</p>
<b>Attachments</b>	

<b>Comment ID:</b>	745	<b>Consultee</b> Councillor Chris Caswill	<b>Agent</b>	<b>Person ID:</b> 549432	<b>Is the DPD legally compliant?</b>	
<b>Comment point</b>	Core Policy 2: Delivery strategy Policy Core Policy 2		<b>Oral participation?</b>		<b>Is the DPD sound?</b>	
<b>Reasons for not legally compliant</b>						
<b>What change(s) are necessary to make the DPD legally compliant?</b>						
<b>Reasons for not sound</b>						
<b>What change(s) are necessary to make the DPD sound?</b>						
<b>Other comments</b>	<p>In respect of Core Policy 2, I continue to argue that the housing numbers for Wiltshire as a whole and Chippenham in particular, are too high, and based on shaky demographic and population movement assumptions.</p> <p>I continue to believe that the proposals in CP 2 and CP10 for the Rawlings Farm area north of Monkton Park are unsound. As is clear from the response to this consultation, this proposal is not supported by the local community. Here I fully endorse the detailed response of the Monkton Park Group.</p> <p>I wish to highlight three main reasons for the proposals not being sound:</p> <ul style="list-style-type: none"> <li>- the lack of consideration of the impact of an exit from the site to the south, along Cocklebury Road and Station Hill. This would bring traffic chaos. In the spirit of Localism, particular attention should be given on this point to the strongly expressed views of local residents.</li> <li>- the environmental loss and damage, clearly spelt out in the Monkton Park Group evidence</li> <li>- the existence of site at Hunters Moon, to which there have been very few objections, which already has access to a road, and where environmental damage will be less (no flood risk and no damage to a river corridor). I understand the relevant developer is ready to move on this site, which thus qualifies as deliverable.</li> </ul> <p>My proposal is to replace the Rawlings Farm site with a Strategic allocation to Hunters Moon.</p> <p>I continue to assert that the exclusion of possible development of land at the M4 Junction 17 from CP 2 and the Chippenham Strategy is perverse. We have had evidence that it has been seriously considered by the Council Cabinet and it should be included, thereby reducing pressure on Chippenham green space.</p>					
<b>Reasons for oral participation</b>						
<b>Attachments</b>						

<b>Comment ID:</b>	1032	<b>Consultee</b> Mr Tim Baker Strategic Land Partnerships	<b>Agent</b> Mr John Baker Peter Brett Associates	<b>Person ID:</b> 644492 556318	<b>Is the DPD legally compliant?</b>  <b>Is the DPD sound?</b>	No  No
<b>Comment point</b>	Core Policy 2: Delivery strategy Policy core policy 2		<b>Oral participation?</b>	Yes	<b>Reasons for unsound</b>	Justified  Effective  Consistent with national policy
<b>Reasons for not legally compliant</b>	<p>Strategic Development Sites</p> <p>The policy should be explicit about how additional sites should be bought forward. It is currently worded that additional sites might be appropriate where they are bought forward through the community neighbourhood planning process, and address the specific community area issues identified. While this approach is supported in principle we have major concerns about how this will be managed and it is not clear what the role of the site allocations DPD is in this process.</p> <p>In addition the policy is poorly worded so that it does not make sense and is very difficult to interpret. Specifically the policy refers to development within the defined limits of development and then proceeds to talk about development outside them. The strategic sites are listed but these are in alphabetical order rather than by settlement which does not aid the understanding of how they contribute to the requirement.</p> <p>The strategic site at South West Chippenham is not included in the list, despite being a Strategic Site, which is included in CP10 and referred to in Appendix A. It would appear that it is being referred to in this policy as Showell Farm and only for employment. This contradicts what is elsewhere in the plan and needs rectifying, the accurate area included together with the right land uses and name.</p> <p>There is also a difference between the total numbers from the sites listed in policy CP2 and table 5.4 in the Chippenham area section.</p> <p>The selection of sites in Chippenham has been complicated by considerable change in views of the planning department on the various sites. Tracing the history of the various options around the town demonstrates the contradictions that exist in this site selection process.</p> <p>The Local Plan Inspector identified the site as a suitable location for development and recognised that it was the best site to be brought forward if necessary. Wiltshire 2026 consultation in 2009 opted for the preferred strategic sites to be a much larger site at land east of Chippenham and nothing to south. The land now allocated at the south west was previously dismissed in Wiltshire 2026 strategic sites background paper 2009 because “The land contains grade 1 agricultural land, is in a Minerals Safeguarding Area and is affected by a buffer zone for the sewage works. The smaller sites would be isolated without wider development taking place in the area.”</p> <p>However, this position changed and a larger site for the whole of the south west area was contained in the Sept 2011 consultation (both in options 1 and 2), although option 2 covered a smaller land area because it also included an area to the east of the town. Justification for its inclusion in 2011 seems to be that the Showell Farm employment site is a key site and can be delivered quickly, in order to link this to the Town Centre a sustainable urban extension should be proposed, and an area of search was proposed.</p> <p>The previous proposals in Wiltshire 2026 identified 5,740 homes for the Community Area as a whole, of which 5,230 were proposed at Chippenham itself. This appears not to have been supported through the consultation event. The Topic Paper 15 refers to the examination of a number of population projection scenarios at a special Area Board meeting to determine what an appropriate figure might be. However, these scenarios are not explained in the documentation and there is no evidence based justification provided for the revised figure of 4,000 new homes,</p>					



	<p>other than the consultation results that demonstrated objection to a high figure.</p> <p>In the current proposal the strategic site has now been reduced in size and excludes Saltersford Lane site (indicated by a red circle on the map below) as well as the wider Hunters Moon area. Topic paper 14 at page 59 justifies this approach in terms of “the reduced housing requirement for Chippenham means that the entire site is not required”. It is not agreed that this is the case (see separate comments on housing requirement) because there is no justification for a reduced level. As a consequence of requiring more dwellings across Wiltshire, further land will be required at Chippenham, because it is such an important strategic settlement. The Saltersford Lane site and wider Hunters Moon area has previously been recognised as a suitable site and should now be recognised by the Core Strategy as providing important housing able to be delivered in the short term. This could either be by including it as part of the South West Chippenham strategic site, and including it accurately in the list in the policy, or by recognising it as a separate deliverable site which makes an important contribution to short term housing delivery to support the Showell Farm employment allocation.</p> <p>This site at Saltersford Lane is capable of being developed on its own or in conjunction with the wider area known as Hunters Moon for residential development to would provide a comprehensive development adjacent to the settlement in the most sustainable location. Bloor Homes are pursuing an adjacent site and representations on the larger site have been submitted on behalf of Bloor Homes and SLP. Both the smaller site and the larger site could be developed either separately or together as a sustainable and deliverable development to complement the employment strategy for Chippenham.</p> <p>This site is on the edge of Chippenham and is well served by local facilities and bus services. It is adjacent to an employment site and other employment opportunities. It is within 0.5m of retail facilities including a supermarket, a nursery and a bus stop which provides regular half hourly services to Chippenham Town Centre, Bath and Corsham. It is also within 1mile of health facilities including Chippenham Community Hospital, a variety of schools and community facilities. The site has previously had permission for employment uses, however, this has not be renewed. Its use for housing would support the existing employment uses and allocations in the area and would provide a genuinely sustainable and deliverable site. There are also no unusual constraints or infrastructure requirements which threaten the short term delivery of these sites.</p> <p>Saltersford Lane site to be included within Core Strategy as a deliverable housing site</p>
<p><b>What change(s) are necessary to make the DPD legally compliant?</b></p>	<p>The site at Saltersford Lane, Chippenham either with or without the wider Hunters Moon area should be recognised as a sustainable and deliverable site. It should be specifically included within the policies of the Core Strategy. This could be by it being made clear that land west of the railway and east and west of Saltersford Lane is included it within the strategic site ‘South West of Chippenham’ which in turn must be included and within the list in policy CP2 (it does not currently appear which is assumed to be a simple error), with the level of dwellings indicated as at least 1300, and / or by identifying it separately as a strategic site or as a non-strategic site through policy CP10.</p> <p>Please see representations on Policy CP10.</p>
<p><b>Reasons for not sound</b></p>	<p>Strategic Development Sites</p> <p>The policy should be explicit about how additional sites should be bought forward. It is currently worded that additional sites might be appropriate where they are bought forward through the community neighbourhood planning process, and address the specific community area issues identified. While this approach is supported in principle we have major concerns about how this will be managed and it is not clear what the role of the site allocations DPD is in this process.</p> <p>In addition the policy is poorly worded so that it does not make sense and is very difficult to interpret. Specifically the policy refers to development within the defined limits of development and then proceeds to talk about development outside them. The strategic sites are listed but these are in alphabetical order rather than by settlement which does not aid the understanding of how they contribute to the requirement.</p>

The strategic site at South West Chippenham is not included in the list, despite being a Strategic Site, which is included in CP10 and referred to in Appendix A. It would appear that it is being referred to in this policy as Showell Farm and only for employment. This contradicts what is elsewhere in the plan and needs rectifying, the accurate area included together with the right land uses and name.

There is also a difference between the total numbers from the sites listed in policy CP2 and table 5.4 in the Chippenham area section.

The selection of sites in Chippenham has been complicated by considerable change in views of the planning department on the various sites. Tracing the history of the various options around the town demonstrates the contradictions that exist in this site selection process.

The Local Plan Inspector identified the site as a suitable location for development and recognised that it was the best site to be brought forward if necessary. Wiltshire 2026 consultation in 2009 opted for the preferred strategic sites to be a much larger site at land east of Chippenham and nothing to south. The land now allocated at the south west was previously dismissed in Wiltshire 2026 strategic sites background paper 2009 because “The land contains grade 1 agricultural land, is in a Minerals Safeguarding Area and is affected by a buffer zone for the sewage works. The smaller sites would be isolated without wider development taking place in the area.”

However, this position changed and a larger site for the whole of the south west area was contained in the Sept 2011 consultation (both in options 1 and 2), although option 2 covered a smaller land area because it also included an area to the east of the town. Justification for its inclusion in 2011 seems to be that the Showell Farm employment site is a key site and can be delivered quickly, in order to link this to the Town Centre a sustainable urban extension should be proposed, and an area of search was proposed.

The previous proposals in Wiltshire 2026 identified 5,740 homes for the Community Area as a whole, of which 5,230 were proposed at Chippenham itself. This appears not to have been supported through the consultation event. The Topic Paper 15 refers to the examination of a number of population projection scenarios at a special Area Board meeting to determine what an appropriate figure might be. However, these scenarios are not explained in the documentation and there is no evidence based justification provided for the revised figure of 4,000 new homes, other than the consultation results that demonstrated objection to a high figure.

In the current proposal the strategic site has now been reduced in size and excludes Saltersford Lane site (indicated by a red circle on the map below) as well as the wider Hunters Moon area. Topic paper 14 at page 59 justifies this approach in terms of “the reduced housing requirement for Chippenham means that the entire site is not required”. It is not agreed that this is the case (see separate comments on housing requirement) because there is no justification for a reduced level. As a consequence of requiring more dwellings across Wiltshire, further land will be required at Chippenham, because it is such an important strategic settlement. The Saltersford Lane site and wider Hunters Moon area has previously been recognised as a suitable site and should now be recognised by the Core Strategy as providing important housing able to be delivered in the short term. This could either be by including it as part of the South West Chippenham strategic site, and including it accurately in the list in the policy, or by recognising it as a separate deliverable site which makes an important contribution to short term housing delivery to support the Showell Farm employment allocation.

This site at Saltersford Lane is capable of being developed on its own or in conjunction with the wider area known as Hunters Moon for residential development to would provide a comprehensive development adjacent to the settlement in the most sustainable location. Bloor Homes are pursuing an adjacent site and representations on the larger site have been submitted on behalf of Bloor Homes and SLP. Both the smaller site and the larger site could be developed either separately or together as a sustainable and deliverable development to complement the employment strategy for Chippenham.

This site is on the edge of Chippenham and is well served by local facilities and bus services. It is adjacent to an employment site and other employment opportunities. It is within 0.5m of retail facilities including a supermarket, a nursery and a bus stop which provides regular half hourly services to Chippenham Town Centre, Bath and Corsham. It is also within 1mile of health facilities including Chippenham Communty Hospital, a

	<p>variety of schools and community facilities. The site has previously had permission for employment uses, however, this has not be renewed. Its use for housing would support the existing employment uses and allocations in the area and would provide a genuinely sustainable and deliverable site. There are also no unusual constraints or infrastructure requirements which threaten the short term delivery of these sites.</p> <p>Saltersford Lane site to be included within Core Strategy as a deliverable housing site</p>
<b>What change(s) are necessary to make the DPD sound?</b>	<p>The site at Saltersford Lane, Chippenham either with or without the wider Hunters Moon area should be recognised as a sustainable and deliverable site. It should be specifically included within the policies of the Core Strategy. This could be by it being made clear that land west of the railway and east and west of Saltersford Lane is included it within the strategic site 'South West of Chippenham' which in turn must be included and within the list in policy CP2 (it does not currently appear which is assumed to be a simple error), with the level of dwellings indicated as at least 1300, and / or by identifying it separately as a strategic site or as a non-strategic site through policy CP10.</p> <p>Please see representations on Policy CP10.</p>
<b>Other comments</b>	
<b>Reasons for oral participation</b>	The issues involved in the consideration of strategic sites is fundamentally linked to the housing requirement and goes to the heart of the spatial strategy and are best dealt with through discussion with a range of parties involved. Further evidence may become available which should be shared through the examination.
<b>Attachments</b>	2159360_0_1.rtf

<b>Comment ID:</b>	849	<b>Consultee</b> Mr Duncan Hames Member of Parliament MP	<b>Agent</b>	<b>Person ID:</b> 480631	<b>Is the DPD legally compliant?</b>	
<b>Comment point</b>	Core Policy 9 Chippenham Central Areas of Opportunity Policy 9		<b>Oral participation?</b>		<b>Is the DPD sound?</b>	
<b>Reasons for not legally compliant</b>						
<b>What change(s) are necessary to make the DPD legally compliant?</b>						
<b>Reasons for not sound</b>						
<b>What change(s) are necessary to make the DPD sound?</b>						
<b>Other comments</b>	<p>Green spaces</p> <p>Two of the core planning principles of the NPPF are to:</p> <p>"take account of the different roles and character of different areas, promoting the vitality of our main urban areas, protecting the Green Belts around them, recognising the intrinsic character and beauty of the countryside and supporting thriving rural communities within it" (Ibid p5).</p> <p>"contribute to conserving and enhancing the natural environment and reducing pollution. Allocations of land for development should prefer land of lesser environmental value, where consistent with other policies in this Framework" (Ibid p6).</p>					

	<p>In my previous submission I explained that the most common concern raised by my constituents is the effect that 4000 extra houses in Chippenham is likely to have upon the town's green spaces. Despite the significant opposition to the strategic site allocation for housing in the north, east and south of Chippenham, the proposals remain within the Core Strategy - indeed. a planning application for 750 dwellings at Hill Corner Road has already been submitted. This had led to many of my constituents to feel that the proposals set out in the Core Strategy are a foregone conclusion and therefore that any further representations that they make to the Council will not be subject to full consideration. While I understand that these housing targets have been reduced from the initial proposals outlined in the Regional Spatial Strategy and that the Council maintains that this was due to consultation with local people, the final number of dwellings proposed remains larger than that required to meet the changing needs of the local population and instead seeks to accommodate overspill from elsewhere.</p> <p>I would welcome Wiltshire Council's continued consideration of Hunters Moon as a potential site for development, specifically north-west of the railway line and between Methuen Park on the A4 and inside the A350. This site has been long established in local plans and for this reason as well as its bounded location, is not subject to widespread objections from local residents. Including this area in the plan would relieve pressure on other sites. In addition, a number of local residents have emphasised the risk of flooding, particularly to the strategic sites to the east of Chippenham. While Wiltshire Council has commissioned Sustainability Appraisals which conclude that additional development to the east of Chippenham will not result in flooding, local residents and campaigning groups have continued to raise their concerns about the prospect of flooding, fearing that the fields surrounding the area of development will not withstand the run-off or water from the proposed dwellings, leading to flooding. To this end my constituents would urge Wiltshire Council to consider the prospect of flooding in this area in more detail.</p>
<b>Reasons for oral participation</b>	
<b>Attachments</b>	

<b>Comment ID:</b>	601	<b>Consultee</b> Mr Tim Baker Strategic Land Partnerships	<b>Agent</b> Mr John Baker Peter Brett Associates	<b>Person ID:</b> 644492 556318	<b>Is the DPD legally compliant?</b>	No
<b>Comment point</b>	Core Policy 10 The Spatial Strategy: Chippenham Community Area Policy 10	<b>Oral participation?</b>	Yes	<b>Is the DPD sound?</b>	No	<p><b>Reasons for not legally compliant</b></p> <p>Core Policy 10 The Spatial Strategy: Chippenham Community Area The Council's Housing requirement of 37,000 is not justified by the available evidence. As such a considerable amount of additional dwellings will need to be provided for in the Core Strategy. Chippenham is a key strategic settlement and should take a considerable amount of this new growth. The current level of growth allocated towards this key settlement is not in line with its role as a strategic settlement for north Wiltshire as well as its employment ambitions. In order to demonstrate the current needs of the town it will be necessary to provide approximately 1,400 dwellings just to sustain its current population of 43,930 (2009). This is merely catering for the change in household size and does not reflect any increase in population. The low level of housing growth at Chippenham will have severe consequences for the achievement of economic development and jobs and also for the delivery of affordable housing which is a key priority for the Council as set out in their Corporate Business and Community plans. The policy allocates only 2250 homes on strategic sites. This is far lower than was previously identified in the Wiltshire 2026 consultation and the</p>
				<b>Reasons for unsound</b>	Justified  Effective  Consistent with national policy	

previous consultation Draft June 2011. The justification for this is due to nothing less than a reduction in the overall housing requirement which is not justified and appears to be a consequence of realigning the figures to provide employment for local residents and seeks to reduce out commuting to zero - an aspiration that is totally unachievable. As discussed in reference to Core Policy 2 there is insufficient evidence provided about how this has been calculated, with no transparency about the assumptions used. The Topic paper does not comprehensively address these essential evidential matters, and it is also unclear whether this realignment can be achieved. If such an approach is required it needs to be supplemented with a mechanism to ensure its implementation and to be monitored closely. It should be supported by a policy which explicitly links the creation of jobs with houses. This approach is rightly not pursued in the Core Strategy because there is concern as expressed by the topic paper 15 at paragraph 12.15 that it would serve to 'constrain development' and 'constrain the ability to address the current acute need for housing'. The policy identifies 2250 new homes on strategic sites. For the size of settlement and its role as a strategic settlement it has a surprisingly low level of development. As paragraph 2.2 states 'Chippenham is one of the largest settlements in Wiltshire. It is a focus for employment growth due to proximity to M4, excellent access and transport links'. It is therefore surprising that it does not have a higher level of housing proposed, especially when compared with the other principle settlement of Salisbury which is identifying 3950 new homes on strategic sites and also the 1350 homes at Kings Gate Amesbury which is a market town.

The selection of sites in Chippenham has been complicated by considerable change in views of the planning department on the various sites. Tracing the history of the various options around the town demonstrates the contradictions that exist in this site selection process. The Local Plan Inspector identified the site as a suitable location for development and recognised that it was the best site to be brought forward if necessary. Wiltshire 2026 consultation in 2009 opted for the preferred strategic sites to be a much larger site at land east of Chippenham and nothing to south. The land now allocated at the south west was previously dismissed in Wiltshire 2026 strategic sites background paper 2009 because "The land contains grade 1 agricultural land, is in a Minerals Safeguarding Area and is affected by a buffer zone for the sewage works. The smaller sites would be isolated without wider development taking place in the area."

However, this position changed and a larger site for the whole of the south west area was contained in the Sept 2011 consultation (both in options 1 and 2), although option 2 covered a smaller land area because it also included an area to the east of the town. Justification for its inclusion in 2011 seems to be that the Showell Farm employment site is a key site and can be delivered quickly, in order to link this to the Town Centre a sustainable urban extension should be proposed, and an area of search was proposed.

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This site at Saltersford Lane is capable of being developed on its own or in conjunction with the wider area known as Hunters Moon for residential development to would provide a comprehensive development adjacent to the settlement in the most sustainable location. Bloor Homes are pursuing an adjacent site and representations on the larger site have been submitted on behalf of Bloor Homes and SLP. Both the smaller site and the larger site could be developed either separately or together as a sustainable and deliverable development to complement the employment strategy for Chippenham.

This site is on the edge of Chippenham and is well served by local facilities and bus services. It is adjacent to an employment site and other employment opportunities. It is within 0.5m of retail facilities including a supermarket, a nursery and a bus stop which provides regular half hourly

	<p>services to Chippenham Town Centre, Bath and Corsham. It is also within 1mile of health facilities including Chippenham Community Hospital, a variety of schools and community facilities. The site has previously had permission for employment uses, however, this has not be renewed. Its use for housing would support the existing employment uses and allocations in the area and would provide a genuinely sustainable and deliverable site. There are also no unusual constraints or infrastructure requirements which threaten the short term delivery of these sites.</p> <p>Salterford Lane site to be included within Core Strategy as a deliverable housing site</p> <p>General policy wording</p> <p>The policy is confusing because it includes a non strategic site at Abbeyfield School. It is not clear why this non strategic site is included and whether other non strategic sites should also have been considered and included within the policy. The table 5.4 includes the calculation of both these sites as making up the 2,400 figure as houses to be identified at strategic sites. This is patently wrong as it includes the 150 at Abbeyfield School which is a non strategic site.</p> <p>The policy seeks to identify the appropriate development within the community area, however the Topic Paper 15 states that it is inappropriate to assess housing delivery at community area scale. This recognises that it is possible to have 'over-delivery at one location relative to others, without compromising the strategy'. While this might be a practical recognition of the artificial nature of boundaries it is not clear how this policy, and the other strategic policies deal with these conflicting approaches or how this will be monitored across the different community areas. Chippenham has a strong housing market and deliverability here could be achieved within the plan period.</p> <p>The policy recognises that additional sites over and above the '330 remainder to be identified' could come forward as long as they consider the issues identified at paragraph 4.48. We support the recognition that the requirement as a minimum figure and other sites could be suitable, deliverable and contribute to achieving the sustainable development of urban extensions as part of the most appropriate spatial strategy for Chippenham. However, we are concerned that paragraph 4.48 refers to phasing to enable employment development come forward in advance of housing. There is no mechanism set out that identifies how this phasing would work in practice and what trigger mechanisms will be in place or how it is monitored. Any attempt to do this is contrary to the text of topic paper 15 which is referred to above and recognises the importance of not constraining the market in delivering much needed housing.</p>
<p><b>What change(s) are necessary to make the DPD legally compliant?</b></p>	<p>The policy as it currently stands is neither justified, effective nor consistent with NPPF. The housing requirement for Chippenham is too low and should be increased to recognise the role the town plays in the area. The housing requirement for Wiltshire as a whole is not based on robust evidence but is clearly too low to meet the housing requirement however calculated, or to present an integrated and implementable strategy and one which reflects the duty to cooperate. The overall housing provision figure in the plan will need to increase and there will need to be a consequent increase in the requirement to be delivered at Chippenham.</p> <p>The figure of 4000 stated for Chippenham in Policy CP10 should be increased therefore. Whilst the figure will have to reflect what is to be stated in an amended Policy CP2, this should be at least 5000.</p> <p>Policy CP10 should then demonstrate how the provision is to be made, though the policy is already confused by the inclusion of some non-strategic provision whilst not dealing comprehensively with how the entire provision will be made. All of this has to be sorted out, though at very least there has to be reference to further sites. The best location for additional sustainable and deliverable development is the Salterford Lane site, which can be developed either separately or in conjunction with the wider Hunters Moon site. This should either be recognised as part of the strategic site at South West Chippenham as was previously considered and supported by the Council in their previous consultation September 2011, or by identifying it separately as a site which could deliver short term growth to support the economic objectives of the Council.</p> <p>The policy should be changed at least to make it clear that the reference to South West Chippenham includes land west of the railway line and east and west of Salterford Lane, and that this combined area could accommodate at least 1300 dwellings with a corresponding amount of employment provision.</p> <p>The area proposed for development needs to be identified in blue on the plan included as fig 5.4, and table 5.4 needs to be amended accordingly.</p>
<p><b>Reasons for not sound</b></p>	
<p><b>What change(s) are necessary to make the DPD sound?</b></p>	
<p><b>Other comments</b></p>	
<p><b>Reasons for oral</b></p>	<p>The issues involved in the consideration Chippenham Community Area and the suitability of sites for development is important in terms of the</p>

<b>participation</b>	appropriateness of the strategy and its deliverability. Consequently they are best dealt with through discussion with a range of parties involved. In addition further evidence may become available which should be shared through the examination.
<b>Attachments</b>	

<b>Comment ID:</b>	758	<b>Consultee</b> Councillor Chris Caswill	<b>Agent</b>	<b>Person ID:</b> 549432	<b>Is the DPD legally compliant?</b>	No
<b>Comment point</b>	Core Policy 10 The Spatial Strategy: Chippenham Community Area Policy Core Policy 10		<b>Oral participation?</b>		<b>Is the DPD sound?</b>	
<b>Reasons for not legally compliant</b>						
<b>What change(s) are necessary to make the DPD legally compliant?</b>						
<b>Reasons for not sound</b>	<p>I strongly support the proposal not to include the land to the East, across the River Avon, as a Strategic Site for housing. I wish to endorse fully the submission made in this respect by the East Chippenham Open Space Group (ECOS). As I have argued before, there are several weighty objections to any building in this area. It would first of all create a separate dormitory area, with easy access to the proposed distributor / ring road and very troubled access to the town centre - either via the already congested Cocklebury Road &amp; Station Hill route or by another river bridge and access road. I have seen a proposal to bring a road up to Long Close, which seems me to be at best costly and ill considered. Secondly the associated ring road would be very expensive (£10 million at least has been quoted) and undeliverable without a much larger number of houses than even the Core Strategy proposes.</p> <p>The current draft also understates the environmental impact of large scale housing in this area. ECOS proposes that this be made much clearer in the final version, both in the appendices and in the main document. The loss of valuable agricultural land would be catastrophic, as would be the detrimental impact on the vital living landscape corridor between Chippenham and Calne and the surrounding villages.</p> <p>The Avon and Marden river valleys may not be designated as an Area of Outstanding Natural Beauty but it is "our" AONB as far as the residents of Chippenham and surrounding villages are concerned. Already there are attractive river walks and Route 403 - a national cycle route - takes advantage of the disused Chippenham to Calne railway bed. It is possible to walk and cycle from the Town Bridge in Chippenham to Castlefields in Calne without ever passing between two buildings and at the same time enjoy the landscape and natural environment of the river valleys and the views to Lyneham Banks, Cherhill and Derry Hill.</p> <p>The final version of the Core Strategy should also recognise that any development East of Chippenham will bring a significant threat of flooding by the Avon and Marden. This area is a flood plain. With climate change bringing longer dry spells followed by torrential rain, the destruction of the "sponge" of the farmland could seriously threaten the lower slopes of the town and the villages to the north and east of Chippenham. In this context, I support the NPPF Technical Guidance on Flood Risk, which recommends a Sequential Test approach, diverting built environment away from Flood Zones at moderate and significant risk.</p> <p>Furthermore I join with ECOS in its Local Green Space proposals, which would take forward the Government policy proposals for sustainable development within 'planetary environmental limits'. We foresee an environmentally positive approach to the land East of Chippenham, with its capacity for significant mitigation of CO2 and flooding through woodland planting. All of which would not only be lost but reversed by housing development in this vital green space.</p> <p>I continue to believe that the proposals in CP 2 and CP10 for the Rawlings Farm area north of Monkton Park are unsound. As is clear from the response to this consultation, this proposal is not supported by the local community. Here I fully endorse the detailed response of the Monkton Park Group.</p>					

	<p>I wish to highlight three main reasons for the proposals not being sound:</p> <ul style="list-style-type: none"> <li>- the lack of consideration of the impact of an exit from the site to the south, along Cocklebury Road and Station Hill. This would bring traffic chaos. In the spirit of Localism, particular attention should be given on this point to the strongly expressed views of local residents.</li> <li>- the environmental loss and damage, clearly spelt out in the Monkton Park Group evidence</li> <li>- the existence of site at Hunters Moon, to which there have been very few objections, which already has access to a road, and where environmental damage will be less (no flood risk and no damage to a river corridor). I understand the relevant developer is ready to move on this site, which thus qualifies as deliverable.</li> </ul> <p>My proposal is to replace the Rawlings Farm site with a Strategic allocation to Hunters Moon.</p> <p>I continue to assert that the exclusion of possible development of land at the M4 Junction 17 from CP 2 and the Chippenham Strategy is perverse. We have had evidence that it has been seriously considered by the Council Cabinet and it should be included, thereby reducing pressure on Chippenham green space.</p>
<b>What change(s) are necessary to make the DPD sound?</b>	
<b>Other comments</b>	
<b>Reasons for oral participation</b>	
<b>Attachments</b>	

<b>Comment ID:</b>	989	<b>Consultee</b> Mr Tom Jacques Jacques Partnership	<b>Agent</b>	<b>Person ID:</b> 640562	<b>Is the DPD legally compliant?</b>	Yes  No
<b>Comment point</b>	Core Policy 10 The Spatial Strategy: Chippenham Community Area Policy Core Policy 10		<b>Oral participation?</b>	Yes	<b>Is the DPD sound?</b>	Justified  Effective  Consistent with national policy
<b>Reasons for not legally compliant</b>						
<b>What change(s) are necessary to make the DPD legally compliant?</b>						
<b>Reasons for not sound</b>	<p>Preliminary Comments on Wiltshire Core Strategy Submission Document Tom Jacques – Executive Summary of Comments on CP10.</p> <p>1 . Support</p> <p>1.1. The general approach to the Core Strategy, the Strategic Objectives, and the Core Policies is supported. This represents the culmination of a significant amount of good work and evidence gathering through difficult circumstances and changing legislation. It is supported by much more comprehensive and clearer documentation and evidence base than was available for previous consultations. It is better resolved and clearly expressed than previously, and it is recognised that further consultation has taken place.</p> <p>1.2. It is understood that the Council is under an obligation to facilitate sustainable development to the county in line with national objectives, and that the Council considers that the evidence leads to the proposed housing number to facilitate and control the growth of Chippenham in</p>					



accordance with its obligations and the outcome of public consultations. It is also clear that the Council considers that the Strategic housing site allocations proposed are the best way of protecting Chippenham from unwanted growth.

## 2. Objection

2.1. The main weakness relates to a lack of sound evidence for the strategic allocation of housing to the South West in the form proposed. The allocation of this strategic site is not justified or effective in realising the wider strategic objectives of the core strategy.

2.2. There is evidence that the allocation of 18 ha of employment land at Showell Farm may have viability issues potentially effecting delivery. The lack of allocation of alternative large sites may lead to a shortage of viable employment land and be detrimental to the aims of the core strategy by resulting in the loss of employment opportunity within Chippenham.

2.3. This employment land is being promoted separately from the residential land. Location of employment land in itself does not adequately justify the strategic allocation of the residential land at SW Chippenham. Allocation of employment land should be on its own merits, and not based upon its associated with the residential land allocation unless the impacts of the combined development on the town are more fully assessed. This housing land is included with a lack of integration, direct connection or continuity with the town as a whole, and will bring an additional burden to existing constricted infrastructure. The premise that this residential land joins the employment land to the town is flawed in practical terms.

2.4. Development of residential land in SW Chippenham should only be allocated if there is adequate supporting infrastructure, including adequate transport links to the parts of the town providing services and facilities to this area. Without such links, the negative impact of a development here would significantly and demonstrably outweigh its benefits, having a detrimental impact on the sustainability, and self containment of the town. It will lead to increased traffic congestion in the centre, and will further compromise already poor network resilience across the town, specifically at the Bridge Centre roundabout. The likely mitigation, a transport link through the development to both the west and east of the town across the river, has not been assessed or included in the Core Strategy, any Transport Studies, or in the Infrastructure Delivery Plan.

2.5. The Sustainability Appraisal and previous consultation responses have not been used to inform the outcomes required from the commissioned evidence base, and comparisons remain based on assumption and supposition. Of particular concern is the lack of Transport Study to inform the emerging Core Strategy and answer questions posed throughout the process.

2.6. The eventual Study relating to Chippenham, the SKM/Colin Buchanan Transport Strategy for Chippenham - Land Allocation Report dated January 2012 (TSC) falls short in terms of briefing, content and timing, and tested options are sub-optimal. The TSC:

2.6.1. has not assessed the full range of options for development to inform the selection of strategic sites,

2.6.2. does not consider whether a direct link from the SW strategic residential site to the east of the town would be preferable when tested against the strategic objectives of the Core Strategy or LTP3;

2.6.3. considers and compares options on a sub-optimal basis, including considering Option 3 without a link road;

2.6.4. uses an incorrect traffic generation baseline which does not adequately address the likely differing traffic generators from different site locations;

2.6.5. has not adequately assessed the future impact of traffic accessing the Abbeyfield school site or other facilities to the east of the town;

2.6.6. does not include or assess the impact of predicted growth within Wiltshire as a whole on the highway network around Chippenham;

2.6.7. does not consider or acknowledge the significant detrimental impact on Lacock;

2.6.8. assumes that the costs of improving the A350 will be met out of contributions from development in Chippenham resulting in limited additional funding for other transport infrastructure. Contributions should be spread across development throughout Wiltshire which contributes to the need for, and will benefit from enhancements to the A350;

2.6.9. is selective on the criteria which are scored, ignoring strategic aims such as network resilience and alleviation of the Bridge Centre roundabout.

2.6.10. has not been used as a tool to inform selection of an optimal solution for Chippenham, but appears tailored to support a pre-determined outcome.

2.6.11. Is significantly less comprehensive, informative or reliable than reports for Devizes and Trowbridge for example.

2.7. This report cannot be relied upon as a basis for selecting the land allocations.

## 3. Suggested Change

3.1. The SW housing allocation should be omitted as a Strategic Site from CP 10 of the Core Strategy, and for the housing numbers allocated to this site to remain to be identified. Of the alternative suggestions, this is the most likely to facilitate the adoption of a sound Core Strategy on the

available evidence, providing more than the required 5 years housing supply through strategic housing land allocations at the North and North East (Rawlings Farm). This approach appears to be supported by Paras 47-49 of the National Planning Policy Framework (NPPF)

3.2. It is acknowledged that the fear of the Council, and the danger in this approach is that applications come forward from developers proposing the Eastern site proposed in 2009, and the South West site currently included as well as Hunters Moon and possibly others, and are each difficult to resist, resulting in significantly more development than Chippenham residents want.

3.3. Greater consideration may be required on how to address this risk, but it is suggested that the Core Strategy should state that it is intended that the remaining allocation of 800 houses is to be identified through a site allocations DPD, or alternatively through a community led neighbourhood planning process to identify which site and related infrastructure provision best achieves the sustainable growth of Chippenham. All of the sites, selection of which evidence suggests is finely balanced, should be included within the plan area for consideration .

3.4. It is also understood that in the context of emerging policy, the Localism Act, and the particular Town and Parish Boundaries around Chippenham, it may be difficult to conceive of an arrangement for a neighbourhood Plan which considers all of the possible residential growth areas together, but it seems that such consideration, on a fuller evidence base is the intention of emerging policy so should be able to be facilitated effectively.

3.5. The lack of clarity on how this process may be organised administratively and technically should not lead to the allocation of a strategic housing land allocation in a form where the adverse impacts clearly and demonstrably outweigh the benefits when assessed against the NPPF and the Strategic Objectives of the Plan.

3.6. Two pieces of work will contribute to clarity on criteria under which this final allocation will be most effective, and it is understood that these have been commissioned already:

3.6.1. A more detailed, informative and resilient Transport Strategy for Chippenham (TSC). This should adequately address the shortfalls in the TSC Land Allocations Report, address questions and concerns raised in successive consultation responses from the Chippenham Vision, and should more effectively assess the infrastructure required to support and integrate development around Chippenham.

3.6.2. A Town Centre based master plan led through the Chippenham Vision. This will help to inform how the town may benefit from changes facilitated by sustainable development around the town. This should help to inform the criterion and relationships with the Town Centre and surrounding town through which development around the town can promote self containment.

3.7. With the benefit of these pieces of work, it should be clearer what infrastructure is required to promote the integration and self containment of the town, and therefore the viability and deliverability of the housing options.

1. Introduction.

1.1. The general approach to the Core Strategy, the Strategic Objectives, and majority of Core Policies are soundly based and represent the culmination of a significant amount of good work and evidence gathering through difficult circumstances and changing legislation.

1.2. The Core Strategy is supported by much more comprehensive and clear documentation and evidence base than was available for previous consultations. It is much better resolved and clearly expressed than previously, and it is recognised that further consultation has taken place. However, significant omissions and apparent errors remain in the evidence base, and responses from the previous consultations have not been adequately addressed.

1.3. These comments and objections mainly relate to the Area Strategy for Chippenham (Core Policy 10), which fails to adequately reconcile the various aspects of the evidence base with the strategic objectives of the Core Strategy to provide an acceptable solution for the town.

1.4. This comment also makes various suggestions about how the Area Strategy could be resolved. The intention is to suggest the basis upon which the Area Strategy could be revised, and to contribute to the next (and hopefully sound) iteration of the strategy. The intention is to overcome the serious problems envisaged under this area strategy and promote an approach which maximises the benefits of sustainable development to the town by improving self containment and self reliance through a vibrant economy and the creation of resilient communities alongside the overall aims of the Chippenham Vision and Strategic Objectives of the Core Strategy.

1.5. The time constraints, the desire to expedite, and the route to adopting a sound core strategy are understood. The hope is that this process of consultation and examination will provide the opportunity for Wiltshire Council to take the extra steps to resolving the conflicts which remain between the Strategic Objectives and their application to Chippenham. There is not a shortage of options for meeting the housing need for Chippenham, the issue is getting the right combination over this time frame, and ensuring that they are adequately supported by infrastructure provision.

## 2. Primary Objection

2.1. The proposed Area Strategy for Chippenham is not justified or effective in relation to the strategic objectives of the Core Strategy. It falls short in terms of all 6 strategic objectives, and in terms of meeting Core Policies 1 and 3. Core Policy 2, in so far as it specifically identifies the strategic sites for each settlement under the Strategic Development heading, follows rather than leads the Area Strategies, and should be revised accordingly.

2.2. The main problem is in the relationship between the provision of housing and the associated highways and other infrastructure, particularly in the extent to which use of and access to the town centre is compromised. Traffic impacts within the wider town will also severely hamper its function, self containment, economic viability, resilience and sustainability. An extra step is required to resolve the evidence base with a workable solution, which may involve further improvements to the evidence base.

2.3. As a basic requirement, the construction of new housing should not be detrimental to the town. If there is a likelihood that new housing will be detrimental to the town, then the new housing should not be allocated until this is dealt with, and the balance can be tipped such that new housing is beneficial to the town in terms of the Strategic Objectives set out in the Core Strategy. Whilst it is recognised that Spatial Planning has a larger scale regional and national strategic function, Government policy<sup>1</sup> is clear that this should not be to the detriment of local communities. As it stands, the core strategy is detrimental to Chippenham.

2.4. In particular, the housing site at South West Chippenham for 800 houses should not be included as a strategic site within the core strategy. There is insufficient evidence to justify this as a strategic allocation for residential development within the Core Strategy. To do so has the potential to remove the flexibility to achieve the objectives of the core strategy in the future.

2.5. There are opportunities to allocate or facilitate the required housing numbers for Chippenham through more robust processes. This should be informed by more comprehensive and sound transport studies relating specifically to Chippenham and taking into account the questions raised through this and previous consultations; the forthcoming Masterplan for the town facilitated by the Chippenham Vision, and should be supported through more effective participation by the community organisations involved in the Chippenham Vision, and through engagement with the Town Team supporting the Cherish Chippenham initiative currently bidding for Portas Pilot funding.

## 3. Housing numbers

3.1. Much debate and consultation has revolved around the (abstracted) issue of absolute housing numbers over the fixed timeframe dictated by the plan period. The consultation has examined these numbers, and a number has been decided upon which has then been applied to the combination of land areas available. Consideration and consultation with the community has been based upon arriving at an absolute number in itself, rather than through consideration of town specific impacts and opportunities<sup>2</sup>. In order to arrive at an effective Area Strategy, this number then needs to be applied and/or moderated in relation to physical constraints and opportunities, including viability and the provision of supporting infrastructure. It is this step which remains to be taken to resolve the Area Strategy.

3.2. The housing number and how this has been arrived at is not the point of this comment. There is a significant local lobby which still considers the housing number to be excessive. The critical issue for Chippenham is that whatever housing number is required needs to be satisfactorily incorporated into the town. If this cannot be achieved in a sustainable manner to integrate with the town and promote self containment, the number should perhaps be revisited. The current Core Strategy does not yet achieve this.

3.3. The housing numbers, and ways of generating these are part of the evidence base, but are not the complete picture. How does the location and number of new houses, the infrastructure provided, and the design and integration of the development contribute to, rather than detract from the town?

3.4. The abolition of the RSS and fixed housing numbers allowed the possibility for councils to move away from an externally defined housing number forming the main generator of forward plans. Housing numbers requirements could thus become part of the evidence base, along with other things beneficial to any community. As long as adequate housing supply is provided, this takes considerable pressure off the council such that it can make more qualitative rather than purely quantitative decisions. This opportunity has not been taken. A different, lower, moderated but technically generated housing number has dictated the form of the forward plans. It should act as part of the baseline information to contribute to effective forward planning.

3.5. The apparent problem is that the reduction in housing numbers through the exercise undertaken, when reconciled with the particular physical realities of Chippenham appears to have resulted in a number not large enough to provide the necessary infrastructure and not small enough to avoid detrimental impact on the town. This needs to be resolved somehow for the area strategy to be successful. Some approach to dealing with

this within the Core Strategy are suggested below.

3.6. Development sites should not be allocated in a sub-optimal way, as this compromises the future by using land allocations ineffectively. The risk of piecemeal or ad-hoc development is that it is not of sufficient critical mass to provide adequate infrastructure to mitigate its impact or maximize the benefit of development, resulting in severe residual cumulative impacts<sup>3</sup>. This seems to be the case with the SW Strategic Housing Land Allocation, which seems to fall short of providing strategic benefit, and is allocated on the basis that it “spreads the pain”.

3.7. If infrastructure funding is insufficient to provide adequate transport infrastructure through allocating 800 houses to this site, whereas an allocation of 1500 houses or more would facilitate such infrastructure, it should be properly assessed whether the 800 houses can be adequately accommodated within existing infrastructure. If infrastructure improvements are made elsewhere (the A350 for example), financed by this development the ability to undertake more beneficial improvements may be lost. It may still be in the future that there will be a need for more housing, but a further 800 houses in (say) 20 years may also not be sufficient to support the provision of the required infrastructure, but this increase cannot be accommodated acceptably within existing infrastructure. Will this mean that the site is sterilized and cannot be developed further, or that another suboptimal solution is imposed? It will be even more difficult to secure the delivery of required infrastructure through later stages alone.

3.8. It may be that a resolution to this problem is in specifying the required housing number over the plan period through the Core Strategy, but not allocating the southern development site through the core strategy itself, awaiting a Site Allocations DPD or neighbourhood planning route to be taken in due course following further evidence, and in time to maintain the required 5 year housing supply (+5% or 20% depending upon the category that Wiltshire falls into). It would appear that this approach is supported by the NPPF (Para 47-49) which required an annual list of 5 year housing supply to be prepared by the LA to allow it to resist development outside the plan. I note that the Corsham Area Strategy, and other areas include larger housing numbers without allocating strategic sites. It would not be inconsistent for Chippenham to take this approach. As a possible avenue, it could be that the further housing numbers and location are considered under a more Chippenham centred approach, along with more comprehensive transport strategies and Town Centre masterplanning can contribute to the evidence base.

#### 4. Infrastructure - Transport.

4.1. Provision of the necessary infrastructure is central to whether the Area Strategy for Chippenham is a success.

4.2. The Chippenham Vision has been asking for the county wide Highways model to be utilized since the first consultation on the Core Strategy in 2009 in order to test scenarios and answer concerns and questions on the strategy proposed at that time. Only in January 2012 has such work been undertaken through the SKM/Colin Buchanan Transport Strategy for Chippenham Land Allocation Report (TSC). Unfortunately this study appears incomplete and flawed in the testing of scenarios and in the resulting conclusions. This evidence does not adequately support or justify the Area Strategy for Chippenham set out in the core strategy. The failure of Wiltshire Council to adequately and fully test these options to inform the development of the Area Strategy for Chippenham over the last 3 years is a serious cause for concern in the soundness of the core strategy.

4.3. Despite the apparent weaknesses, it does contain useful further insight to indicate the problems with the current Area Strategy. However, further work will be required to provide a full evidence base. A complete assessment of the options around Chippenham has never been undertaken to inform the development of the Core Strategy.

4.4. If we understand correctly from the Developers for these alternative options, the south western option is being promoted on the basis that it cannot support a link road at 800 dwellings, but can contribute to improvements in the A350, and the eastern option is being promoted on the basis that it can support a link road at 800 dwellings. In spite of this, that there is no test in the TSC of a southern link is a serious omission in the evidence base, as this is a strategic option which could have an influence on the overall approach to strategic housing allocations within the core strategy. A southern link was considered viable by the developer of the southern option when this site was originally promoted for a higher housing number.

4.5. The TSC is described as being prepared as a report “which supports the proposed spatial strategy” (4.3). This is significantly different from the requirement to “inform” the spatial strategy. The Chippenham Vision Board has made its concerns clear and has asked Spatial Planning and the Sustainable Transport Department that it be consulted in the formulation of the brief for this transport study in order that the recognised problems with Chippenham can be adequately addressed through this work. The Chippenham Vision has not had adequate involvement in this study and it fails to comply with the objectives of LPT3. This results in a report which fails to consider the issues properly or to answer the critical questions for Chippenham.

4.6. A further primary concern with this document is set out in s7.2.1 which states that Option 3 has been tested without the benefit of the proposed completed eastern distributor road, and scoring has been undertaken on this basis. There is no point in considering Option 3 without the proposed distributor road. This is confused by the last paragraphs of this section which is not written clearly, and suggests that the link is then tested. However it appears that much of the relative scoring is undertaken without this link.

4.7. The secondary school catchment does not appear to be taken into account, with pupils from the southern site likely to attend Abbeyfield school. (2010 admissions cut off area for Sheldon 1.7km from school gate, 200m further than walking isochrone shown on Fig 6.7. Other schools had wider catchment areas). This could also apply to the East Chippenham development, although not as extreme as there would be more chance of them being within the Hardenhuish catchment area. In 2010 Monkton Park children were outside the Sheldon catchment area. This was an extreme year, but would be more likely to be repeated with a larger population.

4.8. The basis of modeling for journey numbers, using journeys generated from Cepen Park North to assess other sites, will fail to adequately take into account journeys to secondary school, or other journeys which would be required from the south west of town as those existing from Cepen Park North will involve journeys to Sheldon and Hardenhuish, a high proportion of which will be by foot or bicycle, whereas the options for East and South will require journeys to Abbeyfield, a much larger portion of which are likely to be by car. This will significantly increase congestion and journey times over that shown by the model. It also does not appear to adequately take account of journeys to other parts of the town to the east of the river, including the town centre and Stanley Park Sports ground.

4.9. Whilst it may be a matter of detail, the terminology used in the report when considering other links refers to "Distributor" Road which implies a bypass type approach. This may or may not be necessary for Chippenham, but the real need is for an alternative route to the east-west pinch point at the Bridge Centre, primarily for Local traffic, and designed less for highways efficiency, and more for integrated quality and integration and self containment of the town as a whole.

4.10. The Bridge Centre roundabout is not considered as a significant weakness in the transport network within the town in any assessment as part of the TRC. This is a significantly critical point in the resilience of the local highway network. That no attempt is made to measure or mitigate this is a significant failing. This weakness is recognised in s.2.9.1, and in opportunities a) and b) in 2.9.2, as well as 4.3d), to improve network resilience. It is also clear that this is a significant weakness in the network from the 2010 multi-modal model validation report (PFA Associates), and from the Chippenham Town Centre Public Realm Study undertaken by Hamilton Baillie Associates in 2009, which should form part of the published evidence base. It has been the view of the Chippenham Vision that alleviating this is one of the keys to achieving the aims of the Chippenham Vision and unlocking the potential of the town centre, and that the likeliest way to mitigate this is by way of a southern link, but the possible eastern link provides an alternative if the southern link is not deliverable. The Chippenham Vision Board was assured that this comparison would be undertaken after the last consultation. With the forthcoming Chippenham Masterplan being commissioned, CP10 as set out significantly compromises the potential outcomes of this Masterplan.

4.11. The TSC includes no assessment or comparison of the impact of junctions in the town other than the A350, and the information on this is incomplete and flawed. assessments of the general traffic increases within other parts of the town are referred to in passing in the report with an acceptance that all of the options considered will make traffic flow considerably worse. The only figures on traffic generation used in the report (in relation to flows on the A350) indicate that the significantly favourable option is Option 3. The assessment of wider benefits (7.10) is significantly flawed.

4.12. The method of assessment, grouping objectives together into evaluation criteria (4.3/4.4) significantly skews the results, and disregards a large number of the important objectives for Chippenham in the assessment. A number of the stated objectives of the study in para4.3 are subsequently disregarded, thus further giving a skewed result to the TRC.

4.13. Option 3 is considered and marked on a considerably sub-optimal basis in a number of areas, particularly by the majority of marking taking place without the inclusion of the associated link road. Without this link road, this option should not be considered.

4.14. Some of the assessment criteria are irrelevant, further skewing the results, including:  
Current accessibility by public transport (6.4) is not a forward looking criteria.  
Potential for future bus accessibility (6.5) has not been considered on an equal basis, with housing numbers inflated for the Rowden Park site, and sub optimal bus route which fails to connect to the London Rd for the Option 3 site. (Fig 6.3-6.6)  
A fourth option of development entirely located in the south has not been considered on a comparative basis, although this may provide the critical mass to provide a southern link road.

Whilst on many measures within the report the eastern option with an eastern link is considerably preferable to the south without a link, this does not come across in the conclusions.

The traffic light system of analysis and comparison is based upon poor input information, is selective and flawed. The conclusion that there is little in highways terms to distinguish between the options is therefore incomplete and cannot be relied upon.

4.15. The Chippenham Vision commissioned a study by Hamilton Bailey Associates in 2009 "Town Centre Public Realm Study" to assist us in gaining a clearer understanding of the relationship between the function of the town centre and certain key roads. This study reviews the relationship between traffic volumes and the ability to improve the public realm, and the importance of improving the quality of the public realm to the success of Chippenham as a town. This is supported and reinforced through the strategic objectives of the core strategy, yet undermined by the Area Strategy for Chippenham. It is also inadequately accounted for in the SKM/Colin Buchanan Transport Report for Chippenham.

4.16. The TSC comes across more as an executive summary and is a more superficial document without the substance present in other reports prepared, for example for Devizes and Trowbridge. Given that Chippenham appears to be one of the most problematic towns in terms of finding a suitable solution to the conflicting requirements, it seems unwise to commission a less substantial evidence base for a more complex problem.

4.17. There is no consideration or acknowledgement of the significant detrimental impact upon Lacock from the increased use of the alternative route across the causeway and up Bowden Hill by traffic heading from the south to the east and wishing to bypass congestion at the Bridge Centre Roundabout.

4.18. There appears to be no consideration of extra journeys generated from other housing growth in the district, including Calne which is likely increase loads on the routes to the M4 and the West, currently all by way of the Bridge Centre roundabout.

4.19. There is no account of the strategic importance of the A350 past Chippenham to the towns to the south and West of Chippenham, including Trowbridge, for access to the M4, and the likely traffic increases on the A350 which result from growth in areas other than Chippenham.

4.20. The assessment of mitigation costs is therefore flawed, as no account is taken that a large part of the generator for improvements to the A350 will come from outside Chippenham and should be financed on a Wiltshire wide strategic basis (possibly through CIL) rather than financed through a single development to the South of Chippenham. If this viability is verifiable, the eastern option would appear to provide a preferable solution for Chippenham to meeting the housing numbers than the current Area Strategy. Unfortunately this report fails to provide a adequate information or a sound enough base to review or verify this.

4.21. It seems to be the case that a further piece of work relating to a Transport Strategy for Chippenham is about to be commissioned. It may be that this will be more comprehensive and answer the questions which have been asked over several years of consultations, but it is not clear that this is the case, and it is also not clear whether the timing of this will be adequate to influence the strategic housing land allocations within the core strategy review process should the current South West housing land allocation prove unviable with additional infrastructure requirements, or should the East Chippenham option prove preferable.

4.22. At a personal level, my son plays football for our closest football club. The team train at the excellent new 3G pitches at Stanley Park midweek during the winter. There are no available equivalent facilities to the west of the town. Training starts at 5.30pm. We need to leave at 4.50 to get there in time. I could get to similar facilities in Bath, Bristol, South Gloucestershire or Swindon more quickly at that time of day. Although I have to get into Chippenham from the West in the first place, the majority of the traveling time is within Chippenham itself. I can take alternative routes to the Bridge Centre roundabout, but there is no alternative to the Bridge Centre roundabout. There is no public transport option. This does not contribute to self containment of the town.

4.23. This comment reflects on infrastructure at all levels, not just roads, but where the location of the other infrastructure, such as sporting facilities, schools, etc, is fixed, and provision limited, roads are necessary for us to get there. This is merely an illustration of the wider issue from personal experience which contradicts the TRC.

4.24. The IDP app 1. requires link roads to all development to facilitate effective bus routes(p301), considered to be low risk of failure to deliver. The southern development as proposed fails to deliver adequate links.

4.25. It is understood that there is a cost to running these models, but relative to the overall cost of the work relating to the core strategy for Chippenham, and the economic, social and environmental impacts of the Area Strategy on Chippenham, this should be completed satisfactorily at an appropriate stage to inform the core strategy.

4.26. An interpretation of the approach taken to the TSC could be that the strategic priority to Wiltshire of improving the A350 past Chippenham has overridden the strategic objectives of the Core Strategy in relation to Chippenham. The reason that the Chippenham Vision suggested that the

southern option be considered against the eastern option in the 2009 consultation (Vision comments enclosed) was concern over deliverability of the eastern road link, and concern that an alternative southern road link may be more readily deliverable and beneficial to the function of the town in accordance with concerns which now relate strongly to the strategic objectives of the Core Strategy. The final outcome, a southern development which does not link to the east of the town, where a large portion of its services are located, is a significantly worse option for the town than that originally proposed in 2009.

4.27. It is not apparent why the issue of allowing improved movement of traffic around Chippenham has been omitted from para 5.48 of the Core Strategy as this remains an aim for unlocking Chippenham's potential.

5. Infrastructure – Social, Leisure, retail and services and education.

5.1. Much of this remains located in the Town Centre, with facilities in other parts of the town, in particular to the west (Rugby Club, Chippenham Sports Club, Sheldon and Hardenhuish facilities) and east of the town (Abbeyfield, Stanley Park, Cemetary etc). It is not clear that these have been taken into account in the TRC. The residential developments include a large portion of green infrastructure, which must be appropriately managed, but it does not appear to be the case than any of the developments will provide or improve facilities for the whole town. The aspirations which relate to access to and around the town and quality of the town centre should be prioritized.

6. Employment Land

6.1. The priority in the core strategy on facilitating adequate employment land is fully supported. However, it appears that one of the primary reasons for allocating the Rowden (South West) strategic residential site for housing growth within the Core Strategy is its location adjacent to the Showell Farm employment site.

6.2. The increase in Chippenham's population in recent years is largely because of the quality of schools. Its proximity to road and rail links enables people to move here without having to change from jobs in Bath, but particularly Bristol, Swindon, and further along the M4 corridor to London. Therefore the level of outcommuting is a direct result of the quality of schools alongside increased housing availability, and in itself should not be too much of a cause for concern. It is a function of its location, prices and demographic, as well as the age of the existing housing stock. It does not therefore reflect an indigenous population of Chippenham having to find jobs elsewhere, but is a function of well educated, aspirational population with good jobs elsewhere choosing to live in Chippenham. This is part of the growth of the town. As children go to school and people embed more into the life of the town, and residents move on in their careers and working life, it is important that there is adequate opportunity for employment to grow within the town. Some may wish to set up their own companies, some may wish to work for existing companies more locally, and others may try to relocate their existing companies into the area from elsewhere. Others may just choose to work more from home. It is important that there is adequate availability of employment land and resources to allow this to happen. Restrictions in supply of employment land and premises need to be avoided.

6.3. The danger that employment growth will be constrained is recognized and is a generator for the Area Strategy for Chippenham. Constraining employment land availability will limit the tendency for people to seek employment closer to where they live. This is in danger of perpetuating outcommuting and the disconnection between the residents and the town centre.

6.4. To place such reliance on the Showell Farm site within the Core Strategy seems dangerous. There has been some concern about the deliverability of this site. It is understood that £3.1m in regional growth fund funding was secured for a local company (DTR-VMS) to increase the viability of the employment site at Showell Farm. It was also thought that this was specific to this site. This company now appears to be leaving Chippenham to move to a site in Trowbridge. If this site is not viable as employment land even with this additional funding, there is a risk that this ends up as a repeat of the Hunters Moon employment allocation which has restricted the availability of employment land for some time. Greater resilience would exist by also allocating an alternative large employment site.

6.5. There are further alternative sites which should be considered, in particular the land adjacent to the A350, which is mentioned in Tables 6.2 and 6.4 of the Wiltshire Workspace and Employment Land Review Final Report by Roger Tym and Partners (ELR) but does not appear to be considered and is not included without explanation or detailed comparison. It is immediately adjacent to residential areas and key supporting infrastructure, so does not require adjacent residential development to "join" it to the town. This is adjacent to a residential nursing home, golf club and hotel, therefore adjacent to the existing town, is closer to the M4, thus reducing the need for vehicles on the A350 past Chippenham other than for connections to Wiltshire itself. Whilst it is understood that this site was promoted late, it is not clear why this has not been considered further. The logic of paragraph 7.20 of the ELR is not clear in suggesting that restricting competition between large sites will provide greater clarity to the market. Allocation is only of the single large site at Showell Farm (as well as other smaller

sites). Neither of these sites is likely to be developed on a speculative basis, but only to meet the needs of a particular occupier, and it would be beneficial for there to be options in terms of deliverability and land cost issues to avoid losing further Chippenham Companies to lower cost sites elsewhere as has happened with DTR-VMS.

6.6. It is not appropriate to use the preferred location of employment land to justify the location of a residential development which does not adequately facilitate or fund sufficient infrastructure to mitigate its own impact on the town. Whilst the logic of infilling between this employment site and the existing town is understood, the way this works in this particular arrangement is to create a residential development which repeats the recognized weaknesses in the developments at Pewsham, Cepen Park North, and Cepen Park South, in creating a separate residential development only loosely connected, rather than integrated with the town, and acting as a significant extra burden on the infrastructure of the town without making an adequate contribution to improving it. The employment land will not be more or less connected to the town by the creation of a relatively disconnected residential development on an adjacent site. There is still a strategic need for this employment land, but not at an inflated price which may be demanded if this is the only option for this sort of employment land. This is primarily to prevent the further loss of major employers from Chippenham beyond the loss of DTRVMS, as well as to attract employers to the town.

6.7. During the recent consultation undertaken by Roger Tym and partners in the preparation of their report, there appeared to be a consensus that employment land options should be over-provided in order to introduce competition and flexibility. Whilst there is overprovision, this does not apply to the larger land areas of the sort which would be required by DTRVMS or Herman Miller. This is reflected in the notes from the event, but not in the strategy for Chippenham. The previous allocation for employment land at Hunters Moon was undeliverable, was a sole allocation, and has resulted in the current constraint on supply of employment land in Chippenham which is proving problematic. It is important that this is not perpetuated through the current Core Strategy process.

6.8. It would also be desirable to provide an alternative vehicular access to Bumpers Farm Industrial Estate to relieve pressure on the A350/A420 (Bumpers Farm) roundabout. This could be considered to provide strategic benefit to the town and Wiltshire as a whole by removing the considerable burden at the Bumpers Farm roundabout, and could therefore be considered through the Core Strategy and the Infrastructure Delivery Plan. It may be that this is better considered through the masterplan for the town, but the current intention and commission is that this should focus on the town centre and links to the wider town rather than on the whole town.

6.9. The primary concern of the Chippenham Vision in relation to Town Centre is to ensure that best use is made of key strategic employment land adjacent to the town centre and train station to allow Chippenham to capitalize on its sustainable accessibility to mainline rail services. This again should be taken into account in the forthcoming masterplan.

## 7. Strategic Site Allocation

7.1. The South Western residential site for 800 houses is included as a Strategic Site allocation although it does not appear to offer strategic benefit to the town, and is not necessarily central to the strategy. Progress on the core strategy should not be held up by inclusion of non strategic sites." NPPF para 21 requires that criteria or set of sites allocated to match the strategy and to meet anticipated needs over the plan period. It is not required that all provision is allocated, but that 5 years is required for a plan to be considered up to date (NPPF para 49).

7.2. Allocating strategic sites without robust evidence will undermine the future ability to achieve a better outcome, the South West Chippenham Strategic Housing site should not be allocated within the Core Strategy without proper consideration of its impact on the town and whether mitigation can be satisfactorily achieved with the development remaining viable. Appendix A, which sets out development templates, refers to the emerging Chippenham Transport Strategy but does not recognize that connectivity to the East of the town, including Abbeyfield School will be desirable and should be tested, and that the need to provide such a link could effect the viability and deliverability of the site.

Links to the east of the town are similarly not noted in the sections relating to North Chippenham and Rawlings Green, although other specific transport infrastructure is mentioned with each of these sites.

7.3. If it were to provide a southern road link, then there would be better reason for such an allocation. The effectiveness of a southern road link is not considered in the evidence base supporting the Core Strategy, and this is a serious omission. The allocation of this site to fill a rural land gap between the strategic employment land allocation and the existing town, but integrated with neither, does not appear to fall into the requirement for strategic site allocations. There is no indication that the delivery of this site will subsidise or facilitate the adjacent employment site within the Core Strategy documents or evidence. This site as allocated is a burden on meeting the strategic needs of the town where the adverse impacts outweigh the benefits, not a strategic enhancement.

7.4. In overall terms there remains a concern that with the housing numbers proposed, it may be more beneficial for Chippenham to consider



locating all the housing growth within the southern area of search in order to support the employment land allocation and provide a critical mass of development in the south if this provides better outcomes for the town as a whole. This may then be able to provide the east west alternative link road and the strategic upgrades to the A350, maintaining development proximity to the strategic highway network whilst improving network resilience and improving east/west connections and access to the town centre, along with supporting infrastructure such as a secondary school and sports and leisure facilities. However, it is recognized that the strategic advantages and deliverability of the northern and north eastern sites offer benefits in themselves and in combination. Combined with the advanced stage of the Core strategy and the consultations to date it is unlikely that proposals will be revisited to this extent. There is a strong imperative in moving quickly towards adoption of a sound Core Strategy for the county, and whilst there appear to be sound alternative approaches, the allocation of the northern and north eastern sites appears sound, even if it may be the case that upon more detailed examination other options may be preferable.

#### 8. Consultations/evidence base/sustainability appraisal.

8.1. Whilst Wiltshire council has undertaken an additional round of consultations on the Chippenham aspects of the core strategy, this has still not resulted in a sound evidence base. The sustainability appraisals (SA) carried out have been insubstantial and inconclusive. The opportunity does not appear to have been taken to use one round of the SA process to inform the need for enhancements to the evidence base, and to commission suitable reports. The Chippenham specific report eventually carried out by skm/Colin Buchanan (TRC) is insubstantial and does not consider all the options. The employment report does not adequately consider all proposed employment sites and continues to constrain supply such that costs are higher than the market appears to be able to support.

8.2. The public consultations have been largely based upon discussion of an overall housing number, and have appeared to substitute for, rather than guide, supplement and inform professional input, and the evidence base and consultation process is therefore incomplete.

8.3. Consultation has concentrated on housing numbers as an absolute, not on working with the community to draw out the basis of the concerns about housing numbers and addressing these concerns from first principles on the allocations. It is clear from the work undertaken that there are concerns relating to the loss of and impact on open countryside, and people's access to it, and to overloading existing infrastructure, which many consider to be already overloaded. These are not fully addressed in the evidence base supporting the proposed Core Strategy.

#### 9. Consultation history – Chippenham Vision/Chippenham Chamber of Commerce

9.1. The Chamber of Commerce, as a key member of the Chippenham Vision has been heavily involved in the comments of the Chippenham Vision and it's expressed concerns with the outcomes for Chippenham. The responses to previous consultations on the Core Strategy have often taken the form of concerns and questions, a number of which remain unanswered by the evidence base to the current form of the Core Strategy, in particular on the matter of highways infrastructure. However, the evidence base is much improved, and now offers greater clarity on the extent to which the current Area Strategy will be detrimental to the town. Copies of these previous responses are enclosed to reinforce the consistency of approach and message over the course of these consultations.

9.2. The Chippenham Vision has not made comment on housing numbers, other than welcoming the flexibility that relief from the constraints of the RSS has offered, and a resultant reduction in housing numbers.

9.3. Unfortunately the resultant Area Strategy for Chippenham represents the worst of all worlds, particularly in the allocation of the southern housing site without providing adequate links across the town. This provides adequate housing growth to severely disrupt the function of the town, but insufficient to provide infrastructure to relieve the pressures or to support the town.

9.4. In the Chippenham Vision response to the original Core Strategy consultation in 2009, the preference at that time for the eastern site was questioned on the basis that it seemed preferable to the function of the town and town centre, as well as more likely that the southern link road could be provided through allocating development to the south. That the southern site has been preferred in subsequent core strategies, but without including the essential link road now seems perverse in logic and terms of the potential for harm which this will cause to the town.

9.5. Topic Paper 12, Appendix 3, which summarises and deals with the consultations for June 2012 mentions , yet does not adequately deal with the consultation comments from the Chippenham Vision. However, it gives disproportionate attention to the subsequent comments of "one member of the Vision Board" to substantiate the response to these consultations. The Chamber of Commerce did not submit separate or subsequent comments to those agreed through the Vision Board, and it appears that the alternative view seems to have been used to justify a lack of evidence base to seek answers to the questions raised through these consultations. i.e. How can it be demonstrated that the anticipated harm to Chippenham from the Southern development can be mitigated whilst retaining the viability of the development.

9.6. It is necessary to undertake a more meaningful outcome based process to determine a more positive Strategy for Chippenham by more

effectively balancing housing and employment growth with supporting infrastructure. This will build upon the previous consultations which have focused on elements contributing to the strategy such as housing numbers.

10 - see change box below.

#### 11. Summary

11.1. A satisfactory Area Strategy for Chippenham has not been achieved, whereas it seems completely feasible to do so. That the issues remain the same in principle to those raised 3 years ago, and that there either appears to be insufficient evidence or information to definitively answer the concerns, or that solutions have not been found which resolve the issues is a matter for concern for Chippenham, and for the soundness of the Core Strategy.

11.2. The opportunity of this forward planning process should be taken to resolve dysfunctional elements of the town, but if technical and planning rules prevent this at this time, sites should remain undeveloped until they can be developed to support themselves alongside their full contribution to the town.

11.3. Allocating the south western site as a strategic site in the Core Strategy for development of 800 houses is not justified by the available evidence. To do so has the potential to remove the flexibility to achieve the objectives of the core strategy in the future. The cumulative impact of this, with past residential development, non strategic housing and other growth within Wiltshire is detrimental to the town, and is not adequately considered in or supported by the evidence base. The allocation perpetuates the mistakes made in the previous large scale residential expansions to the town at Pewsham, Cepen Park North and South, in particular by relating the developments more to the ring road than the town itself.

11.4. There is not sufficient infrastructure included to justify this site as a strategic site. This southern site could be a strategic site which could provide significantly more infrastructure and better connection with the wider town, including a strategic east-west southern link across the town, and facilities to reduce the need for such cross town journeys. Allocating the southern site as just housing contributes to addressing the required housing number, but is not central to achievement of the overall strategy as set in the core strategy, the chippenham vision and as required in accordance with pps12.

11.5. Development of this south western site without maximising it's potential, or by misdirecting developers contributions to finance improvements to the A350 will compromise the potential for such strategic infrastructure to be provided in the future.

11.6. As a first option, the south western residential development site should not be included as a strategic site, but the Core Strategy should proceed with a strategic site allocation in excess of the 5 year supply through maintaining the allocation of the North and North east sites. Within this option, the alternatives are

11.6.1. that the 800 houses should be allocated as "sites to be identified", and that further residential allocations are considered through a masterplanning or neighbourhood planning process,

11.6.2. if strategic housing land allocations are required as part of this core strategy, the eastern site is allocated if it is considered that with 800 houses it is viable for the development to include a link road to provide an alternative overall east-west link to relieve the Bridge Centre roundabout and ease pressure on the town centre.

11.7. Alternatively as a second option, all the strategic sites could be re-considered in balance against more resilient evidence more fully considering the options available. This could beneficially include recognition that there needs to be adequate flexibility to enable recognition that development can continue beyond the end of the plan period, such that the provision of adequate infrastructure can be secured through the first stages of development of strategic sites. Either the southern or northern/eastern options could provide adequate infrastructure to enable them to make positive contributions to the town. It is recognised that this second option is likely to have greater impact upon the timing of the Core Strategy as a whole, and is therefore less likely to be the favoured approach. It may also result in increased housing numbers in order to facilitate adequate infrastructure, so is also less likely to be popular locally.

11.8. The issue is not so much which site is allocated, but ensuring that whichever proceeds is beneficial, not detrimental to the town. The core strategy as presented is detrimental to the town and will remove flexibility from the forthcoming master planning process.

This document is the personal view of Tom Jacques. However, this view has also been endorsed by the Chippenham Chamber of Commerce Executive Committee, and the comments are also submitted as the representation of the Chippenham Chamber of Commerce.

I have been involved in the Chamber of Commerce and the Chippenham Vision since 2008. The Chippenham Vision Board consists of a large number of public and private sector, residents and business stakeholder groups within the town representing a range of diverse views. Whilst there are disagreements, the approach is positive and all members have the interests of Chippenham at heart.

	<p>The Chippenham Chamber of Commerce was instrumental in establishing the forerunner of the current Chippenham Vision Board, and commissioning Sutton Griffin Architects to undertake a review of observations of the town and undertook workshops and consultations on what could be done to improve the town. At the time this was under the name Chippenham Vision 2020, and has no relationship with the company called Chippenham 2020 who are currently promoting sites around the town.</p> <p>I am an Architect and RIBA Client Adviser practicing in the Chippenham Community Area, and a governor at Sheldon School in Chippenham with 2 children at school in Chippenham.</p> <p>I am a member of the RIBA Client Adviser Steering group.</p>
<p><b>What change(s) are necessary to make the DPD sound?</b></p>	<p>10. Suggestions for changes/ Possible Resolutions.</p> <p>10.1. The proposed Area Strategy for Chippenham doesn't work for Chippenham. There is an opportunity to make Chippenham function better as a town. The Core Strategy needs to balance new housing with new infrastructure to meet the strategic objectives of the plan and comply with the NPPF. Upon the assumption (which we are not in a position to test or challenge) that the housing number allocated for Chippenham is the minimum which Wiltshire Council considers can be justified as sound, and therefore cannot be reduced this leaves two options. These are accompanied by notes on issues raised by these options, and there may be technical issues related to the Core Strategy process which may require further consideration of how these could work.</p> <p>Option 1</p> <p>10.2. Maintain the proposed housing number, but only allocate strategic sites which can provide adequate supporting infrastructure to fully integrate the developments with the town. Leave the remaining housing numbers as sites to be identified such that these can be dealt with through a site allocations DPD, or through neighborhood planning, possibly assisted by the Chippenham Masterplan.</p> <p>Option 2</p> <p>10.3. Extend the infrastructure of the town to accommodate new development, and tailor the housing numbers to a level which facilitates the provision of adequate infrastructure.</p> <p>Exploring the two options further:</p> <p>10.4. Option 1 above</p> <p>10.4.1. The southern site should not be allocated as a strategic site as proposed. The number of houses remaining to be identified within the plan period will rise, but the problem for Chippenham is not the availability of possible housing land, but finding the best location and making any development work for the town.</p> <p>10.4.2. The strategic housing allocation will still well exceed the basic requirement for allocation of 5 years supply (+buffer) as required in the NPPF. The future options could then be considered on a more comprehensive basis utilising principles of localism, possibly through a site allocations DPD to achieve the best solution. It may be that this delay then offers the possibility of considering a form of development which fully works with Chippenham over the longer term rather than a partial allocation which fails to deliver the necessary supporting infrastructure. This is most likely to result in allocation of North and North East Chippenham and not the southern option as Strategic Sites within the Core Strategy based upon the available evidence and the need to allocate 5 years housing supply as a matter of urgency for the Core Strategy to be sound and to allow ad hoc housing developments which fail to make adequate contribution to the town to be resisted.</p> <p>10.4.3. It is recognized that a Neighbourhood Plan is likely to be difficult to achieve with the cross boundary issues in the locations of the urban extensions, but it should be considered how this may be resolved.</p> <p>10.4.4. The recently appointed consultants undertaking the Chippenham Masterplan, currently intended to be an SPD would be expected to contribute to the evidence base for this in assessing the strengths, weaknesses, opportunities and threats for the town centre, and how improvements to the town centre and its links with the wider town and hinterland can be best facilitated.</p> <p>10.4.5. PPS12 at 4.8 says "The core strategy should be supported by evidence of what physical, social and green infrastructure is needed to enable the amount of development proposed for the area, taking account of its type and distribution. This evidence should cover who will provide the infrastructure and when it will be provided. The core strategy should draw on and in parallel influence any strategies and investment plans of the local authority and other organisations. In the case that the Core Strategy is not informed by robust evidence and allocating strategic sites without robust evidence will undermine the future ability to achieve a better outcome, the Southern site should not be allocated within the Core Strategy unless it is clear that it remains viable in relation to the supporting infrastructure required.</p> <p>10.4.6. However, within this option, if it proves that the Eastern option (Option 3 in the TRC) is able to provide an eastern link within the 800</p>

	<p>housing number as the promoters of the site suggest, and there is a need to allocate sites for the housing numbers currently allocated, then this could be allocated in preference to the south western option, as this will contribute to the town more effectively than the south western development within the required housing numbers. However, this too could be considered alongside a fuller evidence base at site allocations/DPD stage.</p> <p>10.4.7. The NPPF at para 21 suggests that criteria or strategic site allocations can be used to match the strategy to anticipated demands over the plan period. Paragraph 47 at bullet 2 requires a 5 year housing supply (+buffer), and that an annually updated list be maintained of deliverable sites. This mechanism could be used to sequence and orientate the delivery to best meet the needs of the town.</p> <p>10.4.8. It is recognized that it is unlikely that the balance of options will be completely reconsidered given the revised housing numbers as set out in the strategic site allocations section above, and the need to have a deliverable 5 year supply in place at the inception of the Plan.</p> <p>10.4.9. It may be that the example of the South Oxfordshire Core Strategy for Thame is followed. (<a href="http://www.southoxon.gov.uk/services-and-advice/planning-and-building/planningpolicy/core-strategy-examination">http://www.southoxon.gov.uk/services-and-advice/planning-and-building/planningpolicy/core-strategy-examination</a>) recommendation 37a.</p> <p>10.5. Option 2 above</p> <p>10.5.1. This will require a further process of strategic planning building upon the outputs of the previous consultations, worked through to indicate implications of different approaches for the future of Chippenham, beyond the level which could be anticipated or tested through previous consultations, and to seek views on these. This may mean a complete review of all housing options rather than building upon the assumption that the apparently deliverable developments at North Chippenham/Hill Corner Lane and at Rawlings Farm, each of which is of sufficient critical mass to deliver its own self contained and strategic infrastructure, will proceed. See also the notes on the consultation and evidence base.</p> <p>10.5.2. This will mean undertaking a resilient analysis of site viability alongside detailed and comprehensive reviews of infrastructure requirements to achieve a workable solution for the town prior to adoption of the Core Strategy, either accepting an increased housing supply over the plan period, or acknowledging that development may continue beyond the plan period within the framework for development and infrastructure provision set out in this plan. This may mean taking the step of being strategically ahead of the game and looking beyond 2026 at this stage rather than leaving these matters to be considered afresh at the next review and facing the same problems exacerbated. This will either result in a significant delay in the Core Strategy, which is likely to be detrimental to Wiltshire as a whole, including Chippenham, and will be a significantly more expensive and long term project.</p> <p>10.5.3. This is likely to be considerably less popular within the town, but if considered as an alternative should form the basis of a resilient consultation exercise, based upon more extensive comparative, qualitative and viability information which still needs to be prepared.</p> <p>10.5.4. The likely problem with this is the potential delay to the Core Strategy or the lack of allocated 5 year housing supply if all sites are removed from the Core Strategy and a separate Site Allocations DPD is undertaken for the town as a whole. It is likely therefore that Option 1 will be the most likely solution.</p> <p>10.5.5. It is acknowledged that the fear of the Council, and the danger in this approach is that applications come forward from developers proposing the Eastern site proposed in 2009, and the South West site currently included as well as Hunters Moon and possibly others, and are each difficult to resist, resulting in significantly more development than Chippenham residents want.</p> <p>10.5.6. Greater consideration may be required on how to address this risk, but it is suggested that the Core Strategy should state that it is intended that the remaining allocation of 800 houses is to be identified through a site allocations DPD, or alternatively through a community led neighbourhood planning process to identify which site and related infrastructure provision best achieves the sustainable growth of Chippenham. All of the sites, selection of which evidence suggests is finely balanced, should be included within the plan area for consideration.</p> <p>10.5.7. It is also understood that in the context of emerging policy, the Localism Act, and the particular Town and Parish Boundaries around Chippenham, it may be difficult to conceive of an arrangement for a neighbourhood Plan which considers all of the possible residential growth areas together, but it seems that such consideration, on a fuller evidence base is the intention of emerging policy so should be able to be facilitated effectively.</p>
<b>Other comments</b>	
<b>Reasons for oral participation</b>	To support the successful reslution of the remaining concerns.

<b>Attachments</b>	
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<b>Comment ID:</b>	997	<b>Consultee</b> Sir / Madam Unknown Chippenham and District Chamber of Commerce & Industry	<b>Agent</b>	<b>Person ID:</b> 392504	<b>Is the DPD legally compliant?</b>  <b>Is the DPD sound?</b>	Yes  No
<b>Comment point</b>	Core Policy 10 The Spatial Strategy: Chippenham Community Area Policy Core Policy 10		<b>Oral participation?</b>	Yes	<b>Reasons for unsound</b>	Justified  Effective  Consistent with national policy
<b>Reasons for not legally compliant</b>						
<b>What change(s) are necessary to make the DPD legally compliant?</b>						
<b>Reasons for not sound</b>	<p>Preliminary Comments on Wiltshire Core Strategy Submission Document Tom Jacques – Executive Summary of Comments on CP10.</p> <p>1 . Support</p> <p>1.1. The general approach to the Core Strategy, the Strategic Objectives, and the Core Policies is supported. This represents the culmination of a significant amount of good work and evidence gathering through difficult circumstances and changing legislation. It is supported by much more comprehensive and clearer documentation and evidence base than was available for previous consultations. It is better resolved and clearly expressed than previously, and it is recognised that further consultation has taken place.</p> <p>1.2. It is understood that the Council is under an obligation to facilitate sustainable development to the county in line with national objectives, and that the Council considers that the evidence leads to the proposed housing number to facilitate and control the growth of Chippenham in accordance with its obligations and the outcome of public consultations. It is also clear that the Council considers that the Strategic housing site allocations proposed are the best way of protecting Chippenham from unwanted growth.</p> <p>2. Objection</p> <p>2.1. The main weakness relates to a lack of sound evidence for the strategic allocation of housing to the South West in the form proposed. The allocation of this strategic site is not justified or effective in realising the wider strategic objectives of the core strategy.</p> <p>2.2. There is evidence that the allocation of 18 ha of employment land at Showell Farm may have viability issues potentially effecting delivery. The lack of allocation of alternative large sites may lead to a shortage of viable employment land and be detrimental to the aims of the core strategy by resulting in the loss of employment opportunity within Chippenham.</p> <p>2.3. This employment land is being promoted separately from the residential land. Location of employment land in itself does not adequately justify the strategic allocation of the residential land at SW Chippenham. Allocation of employment land should be on its own merits, and not based upon its associated with the residential land allocation unless the impacts of the combined development on the town are more fully assessed. This housing land is included with a lack of integration, direct connection or continuity with the town as a whole, and will bring an additional burden to existing constricted infrastructure. The premise that this residential land joins the employment land to the town is flawed in practical terms.</p> <p>2.4. Development of residential land in SW Chippenham should only be allocated if there is adequate supporting infrastructure, including adequate transport links to the parts of the town providing services and facilities to this area. Without such links, the negative impact of a development here would significantly and demonstrably outweigh its benefits, having a detrimental impact on the sustainability, and self containment of the town. It</p>					

will lead to increased traffic congestion in the centre, and will further compromise already poor network resilience across the town, specifically at the Bridge Centre roundabout. The likely mitigation, a transport link through the development to both the west and east of the town across the river, has not been assessed or included in the Core Strategy, any Transport Studies, or in the Infrastructure Delivery Plan.

2.5. The Sustainability Appraisal and previous consultation responses have not been used to inform the outcomes required from the commissioned evidence base, and comparisons remain based on assumption and supposition. Of particular concern is the lack of Transport Study to inform the emerging Core Strategy and answer questions posed throughout the process.

2.6. The eventual Study relating to Chippenham, the SKM/Colin Buchanan Transport Strategy for Chippenham - Land Allocation Report dated January 2012 (TSC) falls short in terms of briefing, content and timing, and tested options are sub-optimal. The TSC:

2.6.1. has not assessed the full range of options for development to inform the selection of strategic sites,

2.6.2. does not consider whether a direct link from the SW strategic residential site to the east of the town would be preferable when tested against the strategic objectives of the Core Strategy or LTP3;

2.6.3. considers and compares options on a sub-optimal basis, including considering Option 3 without a link road;

2.6.4. uses an incorrect traffic generation baseline which does not adequately address the likely differing traffic generators from different site locations;

2.6.5. has not adequately assessed the future impact of traffic accessing the Abbeyfield school site or other facilities to the east of the town;

2.6.6. does not include or assess the impact of predicted growth within Wiltshire as a whole on the highway network around Chippenham;

2.6.7. does not consider or acknowledge the significant detrimental impact on Lacock;

2.6.8. assumes that the costs of improving the A350 will be met out of contributions from development in Chippenham resulting in limited additional funding for other transport infrastructure. Contributions should be spread across development throughout Wiltshire which contributes to the need for, and will benefit from enhancements to the A350;

2.6.9. is selective on the criteria which are scored, ignoring strategic aims such as network resilience and alleviation of the Bridge Centre roundabout.

2.6.10. has not been used as a tool to inform selection of an optimal solution for Chippenham, but appears tailored to support a pre-determined outcome.

2.6.11. Is significantly less comprehensive, informative or reliable than reports for Devizes and Trowbridge for example.

2.7. This report cannot be relied upon as a basis for selecting the land allocations.

### 3. Suggested Change

3.1. The SW housing allocation should be omitted as a Strategic Site from CP 10 of the Core Strategy, and for the housing numbers allocated to this site to remain to be identified. Of the alternative suggestions, this is the most likely to facilitate the adoption of a sound Core Strategy on the available evidence, providing more than the required 5 years housing supply through strategic housing land allocations at the North and North East (Rawlings Farm). This approach appears to be supported by Paras 47-49 of the National Planning Policy Framework (NPPF)

3.2. It is acknowledged that the fear of the Council, and the danger in this approach is that applications come forward from developers proposing the Eastern site proposed in 2009, and the South West site currently included as well as Hunters Moon and possibly others, and are each difficult to resist, resulting in significantly more development than Chippenham residents want.

3.3. Greater consideration may be required on how to address this risk, but it is suggested that the Core Strategy should state that it is intended that the remaining allocation of 800 houses is to be identified through a site allocations DPD, or alternatively through a community led neighbourhood planning process to identify which site and related infrastructure provision best achieves the sustainable growth of Chippenham. All of the sites, selection of which evidence suggests is finely balanced, should be included within the plan area for consideration .

3.4. It is also understood that in the context of emerging policy, the Localism Act, and the particular Town and Parish Boundaries around Chippenham, it may be difficult to conceive of an arrangement for a neighbourhood Plan which considers all of the possible residential growth areas together, but it seems that such consideration, on a fuller evidence base is the intention of emerging policy so should be able to be facilitated effectively.

3.5. The lack of clarity on how this process may be organised administratively and technically should not lead to the allocation of a strategic housing land allocation in a form where the adverse impacts clearly and demonstrably outweigh the benefits when assessed against the NPPF and the Strategic Objectives of the Plan.

3.6. Two pieces of work will contribute to clarity on criteria under which this final allocation will be most effective, and it is understood that these have been commissioned already:

3.6.1. A more detailed, informative and resilient Transport Strategy for Chippenham (TSC). This should adequately address the shortfalls in the TSC Land Allocations Report, address questions and concerns raised in successive consultation responses from the Chippenham Vision, and should more effectively assess the infrastructure required to support and integrate development around Chippenham.

3.6.2. A Town Centre based master plan led through the Chippenham Vision. This will help to inform how the town may benefit from changes facilitated by sustainable development around the town. This should help to inform the criterion and relationships with the Town Centre and surrounding town through which development around the town can promote self containment.

3.7. With the benefit of these pieces of work, it should be clearer what infrastructure is required to promote the integration and self containment of the town, and therefore the viability and deliverability of the housing options.

1. Introduction.

1.1. The general approach to the Core Strategy, the Strategic Objectives, and majority of Core Policies are soundly based and represent the culmination of a significant amount of good work and evidence gathering through difficult circumstances and changing legislation.

1.2. The Core Strategy is supported by much more comprehensive and clear documentation and evidence base than was available for previous consultations. It is much better resolved and clearly expressed than previously, and it is recognised that further consultation has taken place. However, significant omissions and apparent errors remain in the evidence base, and responses from the previous consultations have not been adequately addressed.

1.3. These comments and objections mainly relate to the Area Strategy for Chippenham (Core Policy 10), which fails to adequately reconcile the various aspects of the evidence base with the strategic objectives of the Core Strategy to provide an acceptable solution for the town.

1.4. This comment also makes various suggestions about how the Area Strategy could be resolved. The intention is to suggest the basis upon which the Area Strategy could be revised, and to contribute to the next (and hopefully sound) iteration of the strategy. The intention is to overcome the serious problems envisaged under this area strategy and promote an approach which maximises the benefits of sustainable development to the town by improving self containment and self reliance through a vibrant economy and the creation of resilient communities alongside the overall aims of the Chippenham Vision and Strategic Objectives of the Core Strategy.

1.5. The time constraints, the desire to expedite, and the route to adopting a sound core strategy are understood. The hope is that this process of consultation and examination will provide the opportunity for Wiltshire Council to take the extra steps to resolving the conflicts which remain between the Strategic Objectives and their application to Chippenham. There is not a shortage of options for meeting the housing need for Chippenham, the issue is getting the right combination over this time frame, and ensuring that they are adequately supported by infrastructure provision.

2. Primary Objection

2.1. The proposed Area Strategy for Chippenham is not justified or effective in relation to the strategic objectives of the Core Strategy. It falls short in terms of all 6 strategic objectives, and in terms of meeting Core Policies 1 and 3. Core Policy 2, in so far as it specifically identifies the strategic sites for each settlement under the Strategic Development heading, follows rather than leads the Area Strategies, and should be revised accordingly.

2.2. The main problem is in the relationship between the provision of housing and the associated highways and other infrastructure, particularly in the extent to which use of and access to the town centre is compromised. Traffic impacts within the wider town will also severely hamper its function, self containment, economic viability, resilience and sustainability. An extra step is required to resolve the evidence base with a workable solution, which may involve further improvements to the evidence base.

2.3. As a basic requirement, the construction of new housing should not be detrimental to the town. If there is a likelihood that new housing will be detrimental to the town, then the new housing should not be allocated until this is dealt with, and the balance can be tipped such that new housing is beneficial to the town in terms of the Strategic Objectives set out in the Core Strategy. Whilst it is recognised that Spatial Planning has a larger scale regional and national strategic function, Government policy<sup>1</sup> is clear that this should not be to the detriment of local communities. As it stands, the core strategy is detrimental to Chippenham.

2.4. In particular, the housing site at South West Chippenham for 800 houses should not be included as a strategic site within the core strategy. There is insufficient evidence to justify this as a strategic allocation for residential development within the Core Strategy. To do so has the potential

to remove the flexibility to achieve the objectives of the core strategy in the future.

2.5. There are opportunities to allocate or facilitate the required housing numbers for Chippenham through more robust processes. This should be informed by more comprehensive and sound transport studies relating specifically to Chippenham and taking into account the questions raised through this and previous consultations; the forthcoming Masterplan for the town facilitated by the Chippenham Vision, and should be supported through more effective participation by the community organisations involved in the Chippenham Vision, and through engagement with the Town Team supporting the Cherish Chippenham initiative currently bidding for Portas Pilot funding.

### 3. Housing numbers

3.1. Much debate and consultation has revolved around the (abstracted) issue of absolute housing numbers over the fixed timeframe dictated by the plan period. The consultation has examined these numbers, and a number has been decided upon which has then been applied to the combination of land areas available. Consideration and consultation with the community has been based upon arriving at an absolute number in itself, rather than through consideration of town specific impacts and opportunities<sup>2</sup>. In order to arrive at an effective Area Strategy, this number then needs to be applied and/or moderated in relation to physical constraints and opportunities, including viability and the provision of supporting infrastructure. It is this step which remains to be taken to resolve the Area Strategy.

3.2. The housing number and how this has been arrived at is not the point of this comment. There is a significant local lobby which still considers the housing number to be excessive. The critical issue for Chippenham is that whatever housing number is required needs to be satisfactorily incorporated into the town. If this cannot be achieved in a sustainable manner to integrate with the town and promote self containment, the number should perhaps be revisited. The current Core Strategy does not yet achieve this.

3.3. The housing numbers, and ways of generating these are part of the evidence base, but are not the complete picture. How does the location and number of new houses, the infrastructure provided, and the design and integration of the development contribute to, rather than detract from the town?

3.4. The abolition of the RSS and fixed housing numbers allowed the possibility for councils to move away from an externally defined housing number forming the main generator of forward plans. Housing numbers requirements could thus become part of the evidence base, along with other things beneficial to any community. As long as adequate housing supply is provided, this takes considerable pressure off the council such that it can make more qualitative rather than purely quantitative decisions. This opportunity has not been taken. A different, lower, moderated but technically generated housing number has dictated the form of the forward plans. It should act as part of the baseline information to contribute to effective forward planning.

3.5. The apparent problem is that the reduction in housing numbers through the exercise undertaken, when reconciled with the particular physical realities of Chippenham appears to have resulted in a number not large enough to provide the necessary infrastructure and not small enough to avoid detrimental impact on the town. This needs to be resolved somehow for the area strategy to be successful. Some approach to dealing with this within the Core Strategy are suggested below.

3.6. Development sites should not be allocated in a sub-optimal way, as this compromises the future by using land allocations ineffectively. The risk of piecemeal or ad-hoc development is that it is not of sufficient critical mass to provide adequate infrastructure to mitigate its impact or maximize the benefit of development, resulting in severe residual cumulative impacts<sup>3</sup>. This seems to be the case with the SW Strategic Housing Land Allocation, which seems to fall short of providing strategic benefit, and is allocated on the basis that it "spreads the pain".

3.7. If infrastructure funding is insufficient to provide adequate transport infrastructure through allocating 800 houses to this site, whereas an allocation of 1500 houses or more would facilitate such infrastructure, it should be properly assessed whether the 800 houses can be adequately accommodated within existing infrastructure. If infrastructure improvements are made elsewhere (the A350 for example), financed by this development the ability to undertake more beneficial improvements may be lost. It may still be in the future that there will be a need for more housing, but a further 800 houses in (say) 20 years may also not be sufficient to support the provision of the required infrastructure, but this increase cannot be accommodated acceptably within existing infrastructure. Will this mean that the site is sterilized and cannot be developed further, or that another suboptimal solution is imposed? It will be even more difficult to secure the delivery of required infrastructure through later stages alone.

3.8. It may be that a resolution to this problem is in specifying the required housing number over the plan period through the Core Strategy, but not allocating the southern development site through the core strategy itself, awaiting a Site Allocations DPD or neighbourhood planning route to be taken in due course following further evidence, and in time to maintain the required 5 year housing supply (+5% or 20% depending upon the



category that Wiltshire falls into). It would appear that this approach is supported by the NPPF (Para 47-49) which required an annual list of 5 year housing supply to be prepared by the LA to allow it to resist development outside the plan. I note that the Corsham Area Strategy, and other areas include larger housing numbers without allocating strategic sites. It would not be inconsistent for Chippenham to take this approach. As a possible avenue, it could be that the further housing numbers and location are considered under a more Chippenham centred approach, along with more comprehensive transport strategies and Town Centre masterplanning can contribute to the evidence base.

#### 4. Infrastructure - Transport.

4.1. Provision of the necessary infrastructure is central to whether the Area Strategy for Chippenham is a success.

4.2. The Chippenham Vision has been asking for the county wide Highways model to be utilized since the first consultation on the Core Strategy in 2009 in order to test scenarios and answer concerns and questions on the strategy proposed at that time. Only in January 2012 has such work been undertaken through the SKM/Colin Buchanan Transport Strategy for Chippenham Land Allocation Report (TSC). Unfortunately this study appears incomplete and flawed in the testing of scenarios and in the resulting conclusions. This evidence does not adequately support or justify the Area Strategy for Chippenham set out in the core strategy. The failure of Wiltshire Council to adequately and fully test these options to inform the development of the Area Strategy for Chippenham over the last 3 years is a serious cause for concern in the soundness of the core strategy.

4.3. Despite the apparent weaknesses, it does contain useful further insight to indicate the problems with the current Area Strategy. However, further work will be required to provide a full evidence base. A complete assessment of the options around Chippenham has never been undertaken to inform the development of the Core Strategy.

4.4. If we understand correctly from the Developers for these alternative options, the south western option is being promoted on the basis that it cannot support a link road at 800 dwellings, but can contribute to improvements in the A350, and the eastern option is being promoted on the basis that it can support a link road at 800 dwellings. In spite of this, that there is no test in the TSC of a southern link is a serious omission in the evidence base, as this is a strategic option which could have an influence on the overall approach to strategic housing allocations within the core strategy. A southern link was considered viable by the developer of the southern option when this site was originally promoted for a higher housing number.

4.5. The TSC is described as being prepared as a report "which supports the proposed spatial strategy" (4.3). This is significantly different from the requirement to "inform" the spatial strategy. The Chippenham Vision Board has made its concerns clear and has asked Spatial Planning and the Sustainable Transport Department that it be consulted in the formulation of the brief for this transport study in order that the recognised problems with Chippenham can be adequately addressed through this work. The Chippenham Vision has not had adequate involvement in this study and it fails to comply with the objectives of LPT3. This results in a report which fails to consider the issues properly or to answer the critical questions for Chippenham.

4.6. A further primary concern with this document is set out in s7.2.1 which states that Option 3 has been tested without the benefit of the proposed completed eastern distributor road, and scoring has been undertaken on this basis. There is no point in considering Option 3 without the proposed distributor road. This is confused by the last paragraphs of this section which is not written clearly, and suggests that the link is then tested. However it appears that much of the relative scoring is undertaken without this link.

4.7. The secondary school catchment does not appear to be taken into account, with pupils from the southern site likely to attend Abbeyfield school. (2010 admissions cut off area for Sheldon 1.7km from school gate, 200m further than walking isochrone shown on Fig 6.7. Other schools had wider catchment areas). This could also apply to the East Chippenham development, although not as extreme as there would be more chance of them being within the Hardenhuish catchment area. In 2010 Monkton Park children were outside the Sheldon catchment area. This was an extreme year, but would be more likely to be repeated with a larger population.

4.8. The basis of modeling for journey numbers, using journeys generated from Cepen Park North to assess other sites, will fail to adequately take into account journeys to secondary school, or other journeys which would be required from the south west of town as those existing from Cepen Park North will involve journeys to Sheldon and Hardenhuish, a high proportion of which will be by foot or bicycle, whereas the options for East and South will require journeys to Abbeyfield, a much larger portion of which are likely to be by car. This will significantly increase congestion and journey times over that shown by the model. It also does not appear to adequately take account of journeys to other parts of the town to the east of the river, including the town centre and Stanley Park Sports ground.

4.9. Whilst it may be a matter of detail, the terminology used in the report when considering other links refers to "Distributor" Road which implies a

bypass type approach. This may or may not be necessary for Chippenham, but the real need is for an alternative route to the east-west pinch point at the Bridge Centre, primarily for Local traffic, and designed less for highways efficiency, and more for integrated quality and integration and self containment of the town as a whole.

4.10. The Bridge Centre roundabout is not considered as a significant weakness in the transport network within the town in any assessment as part of the TRC. This is a significantly critical point in the resilience of the local highway network. That no attempt is made to measure or mitigate this is a significant failing. This weakness is recognised in s.2.9.1, and in opportunities a) and b) in 2.9.2, as well as 4.3d), to improve network resilience. It is also clear that this is a significant weakness in the network from the 2010 multi-modal model validation report (PFA Associates), and from the Chippenham Town Centre Public Realm Study undertaken by Hamilton Baillie Associates in 2009, which should form part of the published evidence base. It has been the view of the Chippenham Vision that alleviating this is one of the keys to achieving the aims of the Chippenham Vision and unlocking the potential of the town centre, and that the likeliest way to mitigate this is by way of a southern link, but the possible eastern link provides an alternative if the southern link is not deliverable. The Chippenham Vision Board was assured that this comparison would be undertaken after the last consultation. With the forthcoming Chippenham Masterplan being commissioned, CP10 as set out significantly compromises the potential outcomes of this Masterplan.

4.11. The TSC includes no assessment or comparison of the impact of junctions in the town other than the A350, and the information on this is incomplete and flawed. assessments of the general traffic increases within other parts of the town are referred to in passing in the report with an acceptance that all of the options considered will make traffic flow considerably worse. The only figures on traffic generation used in the report (in relation to flows on the A350) indicate that the significantly favourable option is Option 3. The assessment of wider benefits (7.10) is significantly flawed.

4.12. The method of assessment, grouping objectives together into evaluation criteria (4.3/4.4) significantly skews the results, and disregards a large number of the important objectives for Chippenham in the assessment. A number of the stated objectives of the study in para4.3 are subsequently disregarded, thus further giving a skewed result to the TRC.

4.13. Option 3 is considered and marked on a considerably sub-optimal basis in a number of areas, particularly by the majority of marking taking place without the inclusion of the associated link road. Without this link road, this option should not be considered.

4.14. Some of the assessment criteria are irrelevant, further skewing the results, including:

Current accessibility by public transport (6.4) is not a forward looking criteria.

Potential for future bus accessibility (6.5) has not been considered on an equal basis, with housing numbers inflated for the Rowden Park site, and sub optimal bus route which fails to connect to the London Rd for the Option 3 site. (Fig 6.3-6.6)

A fourth option of development entirely located in the south has not been considered on a comparative basis, although this may provide the critical mass to provide a southern link road.

Whilst on many measures within the report the eastern option with an eastern link is considerably preferable to the south without a link, this does not come across in the conclusions.

The traffic light system of analysis and comparison is based upon poor input information, is selective and flawed. The conclusion that there is little in highways terms to distinguish between the options is therefore incomplete and cannot be relied upon.

4.15. The Chippenham Vision commissioned a study by Hamilton Bailey Associates in 2009 "Town Centre Public Realm Study" to assist us in gaining a clearer understanding of the relationship between the function of the town centre and certain key roads. This study reviews the relationship between traffic volumes and the ability to improve the public realm, and the importance of improving the quality of the public realm to the success of Chippenham as a town. This is supported and reinforced through the strategic objectives of the core strategy, yet undermined by the Area Strategy for Chippenham. It is also inadequately accounted for in the SKM/Colin Buchanan Transport Report for Chippenham.

4.16. The TSC comes across more as an executive summary and is a more superficial document without the substance present in other reports prepared, for example for Devizes and Trowbridge. Given that Chippenham appears to be one of the most problematic towns in terms of finding a suitable solution to the conflicting requirements, it seems unwise to commission a less substantial evidence base for a more complex problem.

4.17. There is no consideration or acknowledgement of the significant detrimental impact upon Lacock from the increased use of the alternative route across the causeway and up Bowden Hill by traffic heading from the south to the east and wishing to bypass congestion at the Bridge Centre Roundabout.

4.18. There appears to be no consideration of extra journeys generated from other housing growth in the district, including Calne which is likely

increase loads on the routes to the M4 and the West, currently all by way of the Bridge Centre roundabout.

4.19. There is no account of the strategic importance of the A350 past Chippenham to the towns to the south and West of Chippenham, including Trowbridge, for access to the M4, and the likely traffic increases on the A350 which result from growth in areas other than Chippenham.

4.20. The assessment of mitigation costs is therefore flawed, as no account is taken that a large part of the generator for improvements to the A350 will come from outside Chippenham and should be financed on a Wiltshire wide strategic basis (possibly through CIL) rather than financed through a single development to the South of Chippenham. If this viability is verifiable, the eastern option would appear to provide a preferable solution for Chippenham to meeting the housing numbers than the current Area Strategy. Unfortunately this report fails to provide a adequate information or a sound enough base to review or verify this.

4.21. It seems to be the case that a further piece of work relating to a Transport Strategy for Chippenham is about to be commissioned. It may be that this will be more comprehensive and answer the questions which have been asked over several years of consultations, but it is not clear that this is the case, and it is also not clear whether the timing of this will be adequate to influence the strategic housing land allocations within the core strategy review process should the current South West housing land allocation prove unviable with additional infrastructure requirements, or should the East Chippenham option prove preferable.

4.22. At a personal level, my son plays football for our closest football club. The team train at the excellent new 3G pitches at Stanley Park midweek during the winter. There are no available equivalent facilities to the west of the town. Training starts at 5.30pm. We need to leave at 4.50 to get there in time. I could get to similar facilities in Bath, Bristol, South Gloucestershire or Swindon more quickly at that time of day. Although I have to get into Chippenham from the West in the first place, the majority of the traveling time is within Chippenham itself. I can take alternative routes to the Bridge Centre roundabout, but there is no alternative to the Bridge Centre roundabout. There is no public transport option. This does not contribute to self containment of the town.

4.23. This comment reflects on infrastructure at all levels, not just roads, but where the location of the other infrastructure, such as sporting facilities, schools, etc, is fixed, and provision limited, roads are necessary for us to get there. This is merely an illustration of the wider issue from personal experience which contradicts the TRC.

4.24. The IDP app 1. requires link roads to all development to facilitate effective bus routes(p301), considered to be low risk of failure to deliver. The southern development as proposed fails to deliver adequate links.

4.25. It is understood that there is a cost to running these models, but relative to the overall cost of the work relating to the core strategy for Chippenham, and the economic, social and environmental impacts of the Area Strategy on Chippenham, this should be completed satisfactorily at an appropriate stage to inform the core strategy.

4.26. An interpretation of the approach taken to the TSC could be that the strategic priority to Wiltshire of improving the A350 past Chippenham has overridden the strategic objectives of the Core Strategy in relation to Chippenham. The reason that the Chippenham Vision suggested that the southern option be considered against the eastern option in the 2009 consultation (Vision comments enclosed) was concern over deliverability of the eastern road link, and concern that an alternative southern road link may be more readily deliverable and beneficial to the function of the town in accordance with concerns which now relate strongly to the strategic objectives of the Core Strategy. The final outcome, a southern development which does not link to the east of the town, where a large portion of its services are located, is a significantly worse option for the town than that originally proposed in 2009.

4.27. It is not apparent why the issue of allowing improved movement of traffic around Chippenham has been omitted from para 5.48 of the Core Strategy as this remains an aim for unlocking Chippenham's potential.

5. Infrastructure – Social, Leisure, retail and services and education.

5.1. Much of this remains located in the Town Centre, with facilities in other parts of the town, in particular to the west (Rugby Club, Chippenham Sports Club, Sheldon and Hardenhuish facilities) and east of the town (Abbeyfield, Stanley Park, Cemetary etc). It is not clear that these have been taken into account in the TRC. The residential developments include a large portion of green infrastructure, which must be appropriately managed, but it does not appear to be the case than any of the developments will provide or improve facilities for the whole town. The aspirations which relate to access to and around the town and quality of the town centre should be prioritized.

6. Employment Land

6.1. The priority in the core strategy on facilitating adequate employment land is fully supported. However, it appears that one of the primary reasons for allocating the Rowden (South West) strategic residential site for housing growth within the Core Strategy is its location adjacent to the

Showell Farm employment site.

6.2. The increase in Chippenham's population in recent years is largely because of the quality of schools. Its proximity to road and rail links enables people to move here without having to change from jobs in Bath, but particularly Bristol, Swindon, and further along the M4 corridor to London. Therefore the level of outcommuting is a direct result of the quality of schools alongside increased housing availability, and in itself should not be too much of a cause for concern. It is a function of its location, prices and demographic, as well as the age of the existing housing stock. It does not therefore reflect an indigenous population of Chippenham having to find jobs elsewhere, but is a function of well educated, aspirational population with good jobs elsewhere choosing to live in Chippenham. This is part of the growth of the town. As children go to school and people embed more into the life of the town, and residents move on in their careers and working life, it is important that there is adequate opportunity for employment to grow within the town. Some may wish to set up their own companies, some may wish to work for existing companies more locally, and others may try to relocate their existing companies into the area from elsewhere. Others may just choose to work more from home. It is important that there is adequate availability of employment land and resources to allow this to happen. Restrictions in supply of employment land and premises need to be avoided.

6.3. The danger that employment growth will be constrained is recognized and is a generator for the Area Strategy for Chippenham. Constraining employment land availability will limit the tendency for people to seek employment closer to where they live. This is in danger of perpetuating outcommuting and the disconnection between the residents and the town centre.

6.4. To place such reliance on the Showell Farm site within the Core Strategy seems dangerous. There has been some concern about the deliverability of this site. It is understood that £3.1m in regional growth fund funding was secured for a local company (DTR-VMS) to increase the viability of the employment site at Showell Farm. It was also thought that this was specific to this site. This company now appears to be leaving Chippenham to move to a site in Trowbridge. If this site is not viable as employment land even with this additional funding, there is a risk that this ends up as a repeat of the Hunters Moon employment allocation which has restricted the availability of employment land for some time. Greater resilience would exist by also allocating an alternative large employment site.

6.5. There are further alternative sites which should be considered, in particular the land adjacent to the A350, which is mentioned in Tables 6.2 and 6.4 of the Wiltshire Workspace and Employment Land Review Final Report by Roger Tym and Partners (ELR) but does not appear to be considered and is not included without explanation or detailed comparison. It is immediately adjacent to residential areas and key supporting infrastructure, so does not require adjacent residential development to "join" it to the town. This is adjacent to a residential nursing home, golf club and hotel, therefore adjacent to the existing town, is closer to the M4, thus reducing the need for vehicles on the A350 past Chippenham other than for connections to Wiltshire itself. Whilst it is understood that this site was promoted late, it is not clear why this has not been considered further. The logic of paragraph 7.20 of the ELR is not clear in suggesting that restricting competition between large sites will provide greater clarity to the market. Allocation is only of the single large site at Showell Farm (as well as other smaller sites). Neither of these sites is likely to be developed on a speculative basis, but only to meet the needs of a particular occupier, and it would be beneficial for there to be options in terms of deliverability and land cost issues to avoid losing further Chippenham Companies to lower cost sites elsewhere as has happened with DTR-VMS.

6.6. It is not appropriate to use the preferred location of employment land to justify the location of a residential development which does not adequately facilitate or fund sufficient infrastructure to mitigate its own impact on the town. Whilst the logic of infilling between this employment site and the existing town is understood, the way this works in this particular arrangement is to create a residential development which repeats the recognized weaknesses in the developments at Pewsham, Cepen Park North, and Cepen Park South, in creating a separate residential development only loosely connected, rather than integrated with the town, and acting as a significant extra burden on the infrastructure of the town without making an adequate contribution to improving it. The employment land will not be more or less connected to the town by the creation of a relatively disconnected residential development on an adjacent site. There is still a strategic need for this employment land, but not at an inflated price which may be demanded if this is the only option for this sort of employment land. This is primarily to prevent the further loss of major employers from Chippenham beyond the loss of DTRVMS, as well as to attract employers to the town.

6.7. During the recent consultation undertaken by Roger Tym and partners in the preparation of their report, there appeared to be a consensus that employment land options should be over-provided in order to introduce competition and flexibility. Whilst there is overprovision, this does not apply to the larger land areas of the sort which would be required by DTRVMS or Herman Miller. This is reflected in the notes from the event, but not in the strategy for Chippenham. The previous allocation for employment land at Hunters Moon was undeliverable, was a sole allocation, and has

resulted in the current constraint on supply of employment land in Chippenham which is proving problematic. It is important that this is not perpetuated through the current Core Strategy process.

6.8. It would also be desirable to provide an alternative vehicular access to Bumpers Farm Industrial Estate to relieve pressure on the A350/A420 (Bumpers Farm) roundabout. This could be considered to provide strategic benefit to the town and Wiltshire as a whole by removing the considerable burden at the Bumpers Farm roundabout, and could therefore be considered through the Core Strategy and the Infrastructure Delivery Plan. It may be that this is better considered through the masterplan for the town, but the current intention and commission is that this should focus on the town centre and links to the wider town rather than on the whole town.

6.9. The primary concern of the Chippenham Vision in relation to Town Centre is to ensure that best use is made of key strategic employment land adjacent to the town centre and train station to allow Chippenham to capitalize on its sustainable accessibility to mainline rail services. This again should be taken into account in the forthcoming masterplan.

#### 7. Strategic Site Allocation

7.1. The South Western residential site for 800 houses is included as a Strategic Site allocation although it does not appear to offer strategic benefit to the town, and is not necessarily central to the strategy. Progress on the core strategy should not be held up by inclusion of non strategic sites." NPPF para 21 requires that criteria or set of sites allocated to match the strategy and to meet anticipated needs over the plan period. It is not required that all provision is allocated, but that 5 years is required for a plan to be considered up to date (NPPF para 49).

7.2. Allocating strategic sites without robust evidence will undermine the future ability to achieve a better outcome, the South West Chippenham Strategic Housing site should not be allocated within the Core Strategy without proper consideration of its impact on the town and whether mitigation can be satisfactorily achieved with the development remaining viable. Appendix A, which sets out development templates, refers to the emerging Chippenham Transport Strategy but does not recognize that connectivity to the East of the town, including Abbeyfield School will be desirable and should be tested, and that the need to provide such a link could effect the viability and deliverability of the site.

Links to the east of the town are similarly not noted in the sections relating to North Chippenham and Rawlings Green, although other specific transport infrastructure is mentioned with each of these sites.

7.3. If it were to provide a southern road link, then there would be better reason for such an allocation. The effectiveness of a southern road link is not considered in the evidence base supporting the Core Strategy, and this is a serious omission. The allocation of this site to fill a rural land gap between the strategic employment land allocation and the existing town, but integrated with neither, does not appear to fall into the requirement for strategic site allocations. There is no indication that the delivery of this site will subsidise or facilitate the adjacent employment site within the Core Strategy documents or evidence. This site as allocated is a burden on meeting the strategic needs of the town where the adverse impacts outweigh the benefits, not a strategic enhancement.

7.4. In overall terms there remains a concern that with the housing numbers proposed, it may be more beneficial for Chippenham to consider locating all the housing growth within the southern area of search in order to support the employment land allocation and provide a critical mass of development in the south if this provides better outcomes for the town as a whole. This may then be able to provide the east west alternative link road and the strategic upgrades to the A350, maintaining development proximity to the strategic highway network whilst improving network resilience and improving east/west connections and access to the town centre, along with supporting infrastructure such as a secondary school and sports and leisure facilities. However, it is recognized that the strategic advantages and deliverability of the northern and north eastern sites offer benefits in themselves and in combination. Combined with the advanced stage of the Core strategy and the consultations to date it is unlikely that proposals will be revisited to this extent. There is a strong imperative in moving quickly towards adoption of a sound Core Strategy for the county, and whilst there appear to be sound alternative approaches, the allocation of the northern and north eastern sites appears sound, even if it may be the case that upon more detailed examination other options may be preferable.

#### 8. Consultations/evidence base/sustainability appraisal.

8.1. Whilst Wiltshire council has undertaken an additional round of consultations on the Chippenham aspects of the core strategy, this has still not resulted in a sound evidence base. The sustainability appraisals (SA) carried out have been insubstantial and inconclusive. The opportunity does not appear to have been taken to use one round of the SA process to inform the need for enhancements to the evidence base, and to commission suitable reports. The Chippenham specific report eventually carried out by skm/Colin Buchanan (TRC) is insubstantial and does not consider all the options. The employment report does not adequately consider all proposed employment sites and continues to constrain supply such that costs are higher than the market appears to be able to support.

8.2. The public consultations have been largely based upon discussion of an overall housing number, and have appeared to substitute for, rather than guide, supplement and inform professional input, and the evidence base and consultation process is therefore incomplete.

8.3. Consultation has concentrated on housing numbers as an absolute, not on working with the community to draw out the basis of the concerns about housing numbers and addressing these concerns from first principles on the allocations. It is clear from the work undertaken that there are concerns relating to the loss of and impact on open countryside, and people's access to it, and to overloading existing infrastructure, which many consider to be already overloaded. These are not fully addressed in the evidence base supporting the proposed Core Strategy.

9. Consultation history – Chippenham Vision/Chippenham Chamber of Commerce

9.1. The Chamber of Commerce, as a key member of the Chippenham Vision has been heavily involved in the comments of the Chippenham Vision and it's expressed concerns with the outcomes for Chippenham. The responses to previous consultations on the Core Strategy have often taken the form of concerns and questions, a number of which remain unanswered by the evidence base to the current form of the Core Strategy, in particular on the matter of highways infrastructure. However, the evidence base is much improved, and now offers greater clarity on the extent to which the current Area Strategy will be detrimental to the town. Copies of these previous responses are enclosed to reinforce the consistency of approach and message over the course of these consultations.

9.2. The Chippenham Vision has not made comment on housing numbers, other than welcoming the flexibility that relief from the constraints of the RSS has offered, and a resultant reduction in housing numbers.

9.3. Unfortunately the resultant Area Strategy for Chippenham represents the worst of all worlds, particularly in the allocation of the southern housing site without providing adequate links across the town. This provides adequate housing growth to severely disrupt the function of the town, but insufficient to provide infrastructure to relieve the pressures or to support the town.

9.4. In the Chippenham Vision response to the original Core Strategy consultation in 2009, the preference at that time for the eastern site was questioned on the basis that it seemed preferable to the function of the town and town centre, as well as more likely that the southern link road could be provided through allocating development to the south. That the southern site has been preferred in subsequent core strategies, but without including the essential link road now seems perverse in logic and terms of the potential for harm which this will cause to the town.

9.5. Topic Paper 12, Appendix 3, which summarises and deals with the consultations for June 2012 mentions , yet does not adequately deal with the consultation comments from the Chippenham Vision. However, it gives disproportionate attention to the subsequent comments of "one member of the Vision Board" to substantiate the response to these consultations. The Chamber of Commerce did not submit separate or subsequent comments to those agreed through the Vision Board, and it appears that the alternative view seems to have been used to justify a lack of evidence base to seek answers to the questions raised through these consultations. i.e. How can it be demonstrated that the anticipated harm to Chippenham from the Southern development can be mitigated whilst retaining the viability of the development.

9.6. It is necessary to undertake a more meaningful outcome based process to determine a more positive Strategy for Chippenham by more effectively balancing housing and employment growth with supporting infrastructure. This will build upon the previous consultations which have focused on elements contributing to the strategy such as housing numbers.

10 - see change box below.

11. Summary

11.1. A satisfactory Area Strategy for Chippenham has not been achieved, whereas it seems completely feasible to do so. That the issues remain the same in principle to those raised 3 years ago, and that there either appears to be insufficient evidence or information to definitively answer the concerns, or that solutions have not been found which resolve the issues is a matter for concern for Chippenham, and for the soundness of the Cor Strategy.

11.2. The opportunity of this forward planning process should be taken to resolve dysfunctional elements of the town, but if technical and planning rules prevent this at this time, sites should remain undeveloped until they can be developed to support themselves alongside their full contribution to the town.

11.3. Allocating the south western site as a strategic site in the Core Strategy for development of 800 houses is not justified by the available evidence. To do so has the potential to remove the flexibility to achieve the objectives of the core strategy in the future. The cumulative impact of this, with past residential development, non strategic housing and other growth within Wiltshire is detrimental to the town, and is not adequately considered in or supported by the evidence base. The allocation perpetuates the mistakes made in the previous large scale residential expansions to the town at Pewsham, Cepen Park North and South, in particular by relating the developments more to the ring road than the town itself.

	<p>11.4. There is not sufficient infrastructure included to justify this site as a strategic site. This southern site could be a strategic site which could provide significantly more infrastructure and better connection with the wider town, including a strategic east-west southern link across the town, and facilities to reduce the need for such cross town journeys. Allocating the southern site as just housing contributes to addressing the required housing number, but is not central to achievement of the overall strategy as set in the core strategy, the chippenham vision and as required in accordance with pps12.</p> <p>11.5. Development of this south western site without maximising it's potential, or by misdirecting developers contributions to finance improvements to the A350 will compromise the potential for such strategic infrastructure to be provided in the future.</p> <p>11.6. As a first option, the south western residential development site should not be included as a strategic site, but the Core Strategy should proceed with a strategic site allocation in excess of the 5 year supply through maintaining the allocation of the North and North east sites. Within this option, the alternatives are</p> <p>11.6.1. that the 800 houses should be allocated as "sites to be identified", and that further residential allocations are considered through a masterplanning or neighbourhood planning process,</p> <p>11.6.2. if strategic housing land allocations are required as part of this core strategy, the eastern site is allocated if it is considered that with 800 houses it is viable for the development to include a link road to provide an alternative overall east-west link to relieve the Bridge Centre roundabout and ease pressure on the town centre.</p> <p>11.7. Alternatively as a second option, all the strategic sites could be re-considered in balance against more resilient evidence more fully considering the options available. This could beneficially include recognition that there needs to be adequate flexibility to enable recognition that development can continue beyond the end of the plan period, such that the provision of adequate infrastructure can be secured through the first stages of development of strategic sites. Either the southern or northern/eastern options could provide adequate infrastructure to enable them to make positive contributions to the town. It is recognised that this second option is likely to have greater impact upon the timing of the Core Strategy as a whole, and is therefore less likely to be the favoured approach. It may also result in increased housing numbers in order to facilitate adequate infrastructure, so is also less likely to be popular locally.</p> <p>11.8. The issue is not so much which site is allocated, but ensuring that whichever proceeds is beneficial, not detrimental to the town. The core strategy as presented is detrimental to the town and will remove flexibility from the forthcoming master planning process.</p> <p>This document is the personal view of Tom Jacques. However, this view has also been endorsed by the Chippenham Chamber of Commerce Executive Committee, and the comments are also submitted as the representation of the Chippenham Chamber of Commerce.</p> <p>I have been involved in the Chamber of Commerce and the Chippenham Vision since 2008. The Chippenham Vision Board consists of a large number of public and private sector, residents and business stakeholder groups within the town representing a range of diverse views. Whilst there are disagreements, the approach is positive and all members have the interests of Chippenham at heart.</p> <p>The Chippenham Chamber of Commerce was instrumental in establishing the forerunner of the current Chippenham Vision Board, and commissioning Sutton Griffin Architects to undertake a review of observations of the town and undertook workshops and consultations on what could be done to improve the town. At the time this was under the name Chippenham Vision 2020, and has no relationship with the company called Chippenham 2020 who are currently promoting sites around the town.</p> <p>I am an Architect and RIBA Client Adviser practicing in the Chippenham Community Area, and a governor at Sheldon School in Chippenham with 2 children at school in Chippenham.</p> <p>I am a member of the RIBA Client Adviser Steering group.</p>
<p><b>What change(s) are necessary to make the DPD sound?</b></p>	<p>10. Suggestions for changes/ Possible Resolutions.</p> <p>10.1. The proposed Area Strategy for Chippenham doesn't work for Chippenham. There is an opportunity to make Chippenham function better as a town. The Core Strategy needs to balance new housing with new infrastructure to meet the strategic objectives of the plan and comply with the NPPF. Upon the assumption (which we are not in a position to test or challenge) that the housing number allocated for Chippenham is the minimum which Wiltshire Council considers can be justified as sound, and therefore cannot be reduced this leaves two options. These are accompanied by notes on issues raised by these options, and there may be technical issues related to the Core Strategy process which may require further consideration of how these could work.</p> <p>Option 1</p> <p>10.2. Maintain the proposed housing number, but only allocate strategic sites which can provide adequate supporting infrastructure to fully</p>

integrate the developments with the town. Leave the remaining housing numbers as sites to be identified such that these can be dealt with through a site allocations DPD, or through neighborhood planning, possibly assisted by the Chippenham Masterplan.

#### Option 2

10.3. Extend the infrastructure of the town to accommodate new development, and tailor the housing numbers to a level which facilitates the provision of adequate infrastructure.

Exploring the two options further:

#### 10.4. Option 1 above

10.4.1. The southern site should not be allocated as a strategic site as proposed. The number of houses remaining to be identified within the plan period will rise, but the problem for Chippenham is not the availability of possible housing land, but finding the best location and making any development work for the town.

10.4.2. The strategic housing allocation will still well exceed the basic requirement for allocation of 5 years supply (+buffer) as required in the NPPF. The future options could then be considered on a more comprehensive basis utilising principles of localism, possibly through a site allocations DPD to achieve the best solution. It may be that this delay then offers the possibility of considering a form of development which fully works with Chippenham over the longer term rather than a partial allocation which fails to deliver the necessary supporting infrastructure. This is most likely to result in allocation of North and North East Chippenham and not the southern option as Strategic Sites within the Core Strategy based upon the available evidence and the need to allocate 5 years housing supply as a matter of urgency for the Core Strategy to be sound and to allow ad hoc housing developments which fail to make adequate contribution to the town to be resisted.

10.4.3. It is recognized that a Neighbourhood Plan is likely to be difficult to achieve with the cross boundary issues in the locations of the urban extensions, but it should be considered how this may be resolved.

10.4.4. The recently appointed consultants undertaking the Chippenham Masterplan, currently intended to be an SPD would be expected to contribute to the evidence base for this in assessing the strengths, weaknesses, opportunities and threats for the town centre, and how improvements to the town centre and its links with the wider town and hinterland can be best facilitated.

10.4.5. PPS12 at 4.8 says "The core strategy should be supported by evidence of what physical, social and green infrastructure is needed to enable the amount of development proposed for the area, taking account of its type and distribution. This evidence should cover who will provide the infrastructure and when it will be provided. The core strategy should draw on and in parallel influence any strategies and investment plans of the local authority and other organisations. In the case that the Core Strategy is not informed by robust evidence and allocating strategic sites without robust evidence will undermine the future ability to achieve a better outcome, the Southern site should not be allocated within the Core Strategy unless it is clear that it remains viable in relation to the supporting infrastructure required.

10.4.6. However, within this option, if it proves that the Eastern option (Option 3 in the TRC) is able to provide an eastern link within the 800 housing number as the promoters of the site suggest, and there is a need to allocate sites for the housing numbers currently allocated, then this could be allocated in preference to the south western option, as this will contribute to the town more effectively than the south western development within the required housing numbers. However, this too could be considered alongside a fuller evidence base at site allocations/DPD stage.

10.4.7. The NPPF at para 21 suggests that criteria or strategic site allocations can be used to match the strategy to anticipated demands over the plan period. Paragraph 47 at bullet 2 requires a 5 year housing supply (+buffer), and that an annually updated list be maintained of deliverable sites. This mechanism could be used to sequence and orientate the delivery to best meet the needs of the town.

10.4.8. It is recognized that it is unlikely that the balance of options will be completely reconsidered given the revised housing numbers as set out in the strategic site allocations

section above, and the need to have a deliverable 5 year supply in place at the inception of the Plan.

10.4.9. It may be that the example of the South Oxfordshire Core Strategy for Thame is followed.

(<http://www.southoxon.gov.uk/services-and-advice/planning-and-building/planningpolicy/core-strategy-examination>) recommendation 37a.

#### 10.5. Option 2 above

10.5.1. This will require a further process of strategic planning building upon the outputs of the previous consultations, worked through to indicate implications of different approaches for the future of Chippenham, beyond the level which could be anticipated or tested through previous consultations, and to seek views on these. This may mean a complete review of all housing options rather than building upon the assumption that



	<p>the apparently deliverable developments at North Chippenham/Hill Corner Lane and at Rawlings Farm, each of which is of sufficient critical mass to deliver its own self contained and strategic infrastructure, will proceed. See also the notes on the consultation and evidence base.</p> <p>10.5.2. This will mean undertaking a resilient analysis of site viability alongside detailed and comprehensive reviews of infrastructure requirements to achieve a workable solution for the town prior to adoption of the Core Strategy, either accepting an increased housing supply over the plan period, or acknowledging that development may continue beyond the plan period within the framework for development and infrastructure provision set out in this plan. This may mean taking the step of being strategically ahead of the game and looking beyond 2026 at this stage rather than leaving these matters to be considered afresh at the next review and facing the same problems exacerbated. This will either result in a significant delay in the Core Strategy, which is likely to be detrimental to Wiltshire as a whole, including Chippenham, and will be a significantly more expensive and long term project.</p> <p>10.5.3. This is likely to be considerably less popular within the town, but if considered as an alternative should form the basis of a resilient consultation exercise, based upon more extensive comparative, qualitative and viability information which still needs to be prepared.</p> <p>10.5.4. The likely problem with this is the potential delay to the Core Strategy or the lack of allocated 5 year housing supply if all sites are removed from the Core Strategy and a separate Site Allocations DPD is undertaken for the town as a whole. It is likely therefore that Option 1 will be the most likely solution.</p> <p>10.5.5. It is acknowledged that the fear of the Council, and the danger in this approach is that applications come forward from developers proposing the Eastern site proposed in 2009, and the South West site currently included as well as Hunters Moon and possibly others, and are each difficult to resist, resulting in significantly more development than Chippenham residents want.</p> <p>10.5.6. Greater consideration may be required on how to address this risk, but it is suggested that the Core Strategy should state that it is intended that the remaining allocation of 800 houses is to be identified through a site allocations DPD, or alternatively through a community led neighbourhood planning process to identify which site and related infrastructure provision best achieves the sustainable growth of Chippenham. All of the sites, selection of which evidence suggests is finely balanced, should be included within the plan area for consideration.</p> <p>10.5.7. It is also understood that in the context of emerging policy, the Localism Act, and the particular Town and Parish Boundaries around Chippenham, it may be difficult to conceive of an arrangement for a neighbourhood Plan which considers all of the possible residential growth areas together, but it seems that such consideration, on a fuller evidence base is the intention of emerging policy so should be able to be facilitated effectively.</p>
<b>Other comments</b>	
<b>Reasons for oral participation</b>	To support the successful resolution of the remaining concerns.
<b>Attachments</b>	

<b>Comment ID:</b>	1027	<b>Consultee</b> Mr Tim Baker Strategic Land Partnerships	<b>Agent</b> Mr John Baker Peter Brett Associates	<b>Person ID:</b> 644492 556318	<b>Is the DPD legally compliant?</b>	No
					<b>Is the DPD sound?</b>	No
<b>Comment point</b>	Core Policy 10 The Spatial Strategy: Chippenham Community Area Policy Core Policy 10	<b>Oral participation?</b>		Yes	<b>Reasons for unsound</b>	Justified  Effective  Consistent with national policy
<b>Reasons for not legally</b>	The Council's Housing requirement of 37,000 is not justified by the available evidence. As such a considerable amount of additional dwellings will					

<b>compliant</b>	<p>need to be provided for in the Core Strategy. Chippenham is a key strategic settlement and should take a considerable amount of this new growth.</p> <p>The current level of growth allocated towards this key settlement is not in line with its role as a strategic settlement for north Wiltshire as well as its employment ambitions. In order to demonstrate the current needs of the town it will be necessary to provide approximately 1,400 dwellings just to sustain its current population of 43,930 (2009). This is merely catering for the change in household size and does not reflect any increase in population. The low level of housing growth at Chippenham will have severe consequences for the achievement of economic development and jobs and also for the delivery of affordable housing which is a key priority for the Council as set out in their Corporate Business and Community plans.</p> <p>The policy allocates only 2250 homes on strategic sites. This is far lower than was previously identified in the Wiltshire 2026 consultation and the previous consultation Draft June 2011. The justification for this is due to nothing less than a reduction in the overall housing requirement which is not justified and appears to be a consequence of realigning the figures to provide employment for local residents and seeks to reduce out commuting to zero – an aspiration that is totally unachievable. As discussed in reference to Core Policy 2 there is insufficient evidence provided about how this has been calculated, with no transparency about the assumptions used. The Topic paper does not comprehensively address these essential evidential matters, and it is also unclear whether this realignment can be achieved. If such an approach is required it needs to be supplemented with a mechanism to ensure its implementation and to be monitored closely. It should be supported by a policy which explicitly links the creation of jobs with houses. This approach is rightly not pursued in the Core Strategy because there is concern as expressed by the topic paper 15 at paragraph 12.15 that it would serve to ‘constrain development’ and ‘constrain the ability to address the current acute need for housing’.</p> <p>The policy identifies 2250 new homes on strategic sites. For the size of settlement and its role as a strategic settlement it has a surprisingly low level of development. As paragraph 2.2 states ‘Chippenham is one of the largest settlements in Wiltshire. It is a focus for employment growth due to proximity to M4, excellent access and transport links’. It is therefore surprising that it does not have a higher level of housing proposed, especially when compared with the other principle settlement of Salisbury which is identifying 3950 new homes on strategic sites and also the 1350 homes at Kings Gate Amesbury which is a market town.</p> <p>The selection of sites in Chippenham has been complicated by considerable change in views of the planning department on the various sites. Tracing the history of the various options around the town demonstrates the contradictions that exist in this site selection process.</p> <p>The Local Plan Inspector identified the site as a suitable location for development and recognised that it was the best site to be brought forward if necessary. Wiltshire 2026 consultation in 2009 opted for the preferred strategic sites to be a much larger site at land east of Chippenham and nothing to south. The land now allocated at the south west was previously dismissed in Wiltshire 2026 strategic sites background paper 2009 because “The land contains grade 1 agricultural land, is in a Minerals Safeguarding Area and is affected by a buffer zone for the sewage works. The smaller sites would be isolated without wider development taking place in the area.”</p> <p>However, this position changed and a larger site for the whole of the south west area was contained in the Sept 2011 consultation (both in options 1 and 2), although option 2 covered a smaller land area because it also included an area to the east of the town. Justification for its inclusion in 2011 seems to be that the Showell Farm employment site is a key site and can be delivered quickly, in order to link this to the Town Centre a sustainable urban extension should be proposed, and an area of search was proposed.</p> <p>The previous proposals in Wiltshire 2026 identified 5,740 homes for the Community Area as a whole, of which 5,230 were proposed at Chippenham itself. This appears not to have been supported through the consultation event. The Topic Paper 15 refers to the examination of a number of population projection scenarios at a special Area Board meeting to determine what an appropriate figure might be. However, these scenarios are not explained in the documentation and there is no evidence based justification provided for the revised figure of 4,000 new homes, other than the consultation results that demonstrated objection to a high figure.</p>
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In the current proposal the strategic site has now been reduced in size and excludes Saltersford Lane site (indicated by a red circle on the map below) as well as the wider Hunters Moon area. Topic paper 14 at page 59 justifies this approach in terms of “the reduced housing requirement for Chippenham means that the entire site is not required”. It is not agreed that this is the case (see separate comments on housing requirement) because there is no justification for a reduced level. As a consequence of requiring more dwellings across Wiltshire, further land will be required at Chippenham, because it is such an important strategic settlement. The Saltersford Lane site and wider Hunters Moon area has previously been recognised as a suitable site and should now be recognised by the Core Strategy as providing important housing able to be delivered in the short term. This could either be by including it as part of the South West Chippenham strategic site, and including it accurately in the list in the policy, or by recognising it as a separate deliverable site which makes an important contribution to short term housing delivery to support the Showell Farm employment allocation.

This site at Saltersford Lane is capable of being developed on its own or in conjunction with the wider area known as Hunters Moon for residential development to would provide a comprehensive development adjacent to the settlement in the most sustainable location. Bloor Homes are pursuing an adjacent site and representations on the larger site have been submitted on behalf of Bloor Homes and SLP. Both the smaller site and the larger site could be developed either separately or together as a sustainable and deliverable development to complement the employment strategy for Chippenham.

This site is on the edge of Chippenham and is well served by local facilities and bus services. It is adjacent to an employment site and other employment opportunities. It is within 0.5m of retail facilities including a supermarket, a nursery and a bus stop which provides regular half hourly services to Chippenham Town Centre, Bath and Corsham. It is also within 1mile of health facilities including Chippenham Community Hospital, a variety of schools and community facilities. The site has previously had permission for employment uses, however, this has not be renewed. Its use for housing would support the existing employment uses and allocations in the area and would provide a genuinely sustainable and deliverable site. There are also no unusual constraints or infrastructure requirements which threaten the short term delivery of these sites.

Saltersford Lane site to be included within Core Strategy as a deliverable housing site

#### General policy wording

The policy is confusing because it includes a non strategic site at Abbeyfield School. It is not clear why this non strategic site is included and whether other non strategic sites should also have been considered and included within the policy. The table 5.4 includes the calculation of both these sites as making up the 2,400 figure as houses to be identified at strategic sites. This is patently wrong as it includes the 150 at Abbeyfield School which is a non strategic site.

The policy seeks to identify the appropriate development within the community area, however the Topic Paper 15 states that it is inappropriate to assess housing delivery at community area scale. This recognises that it is possible to have ‘over-delivery at one location relative to others, without compromising the strategy’. While this might be a practical recognition of the artificial nature of boundaries it is not clear how this policy, and the other strategic policies deal with these conflicting approaches or how this will be monitored across the different community areas. Chippenham has a strong housing market and deliverability here could be achieved within the plan period.

The policy recognises that additional sites over and above the ‘330 remainder to be identified’ could come forward as long as they consider the issues identified at paragraph 4.48. We support the recognition that the requirement as a minimum figure and other sites could be suitable, deliverable and contribute to achieving the sustainable development of urban extensions as part of the most appropriate spatial strategy for Chippenham. However, we are concerned that paragraph 4.48 refers to phasing to enable employment development come forward in advance of housing. There is no mechanism set out that identifies how this phasing would work in practice and what trigger mechanisms will be in place or how it is monitored. Any attempt to do this is contrary to the text of topic paper 15 which is referred to above and recognises the importance of not constraining the market in delivering much needed housing.

<p><b>What change(s) are necessary to make the DPD legally compliant?</b></p>	<p>The policy as it currently stands is neither justified, effective nor consistent with NPPF. The housing requirement for Chippenham is too low and should be increased to recognise the role the town plays in the area. The housing requirement for Wiltshire as a whole is not based on robust evidence but is clearly too low to meet the housing requirement however calculated, or to present an integrated and implementable strategy and one which reflects the duty to cooperate. The overall housing provision figure in the plan will need to increase and there will need to be a consequent increase in the requirement to be delivered at Chippenham.</p> <p>The figure of 4000 stated for Chippenham in Policy CP10 should be increased therefore. Whilst the figure will have to reflect what is to be stated in an amended Policy CP2, this should be at least 5000.</p> <p>Policy CP10 should then demonstrate how the provision is to be made, though the policy is already confused by the inclusion of some non-strategic provision whilst not dealing comprehensively with how the entire provision will be made. All of this has to be sorted out, though at very least there has to be reference to further sites. The best location for additional sustainable and deliverable development is the Saltersford Lane site, which can be developed either separately or in conjunction with the wider Hunters Moon site. This should either be recognised as part of the strategic site at South West Chippenham as was previously considered and supported by the Council in their previous consultation September 2011, or by identifying it separately as a site which could deliver short term growth to support the economic objectives of the Council.</p> <p>The policy should be changed at least to make it clear that the reference to South West Chippenham includes land west of the railway line and east and west of Saltersford Lane, and that this combined area could accommodate at least 1300 dwellings with a corresponding amount of employment provision.</p> <p>The area proposed for development needs to be identified in blue on the plan included as fig 5.4, and table 5.4 needs to be amended accordingly.</p>
<p><b>Reasons for not sound</b></p>	<p>The Council's Housing requirement of 37,000 is not justified by the available evidence. As such a considerable amount of additional dwellings will need to be provided for in the Core Strategy. Chippenham is a key strategic settlement and should take a considerable amount of this new growth.</p> <p>The current level of growth allocated towards this key settlement is not in line with its role as a strategic settlement for north Wiltshire as well as its employment ambitions. In order to demonstrate the current needs of the town it will be necessary to provide approximately 1,400 dwellings just to sustain its current population of 43,930 (2009). This is merely catering for the change in household size and does not reflect any increase in population. The low level of housing growth at Chippenham will have severe consequences for the achievement of economic development and jobs and also for the delivery of affordable housing which is a key priority for the Council as set out in their Corporate Business and Community plans.</p> <p>The policy allocates only 2250 homes on strategic sites. This is far lower than was previously identified in the Wiltshire 2026 consultation and the previous consultation Draft June 2011. The justification for this is due to nothing less than a reduction in the overall housing requirement which is not justified and appears to be a consequence of realigning the figures to provide employment for local residents and seeks to reduce out commuting to zero – an aspiration that is totally unachievable. As discussed in reference to Core Policy 2 there is insufficient evidence provided about how this has been calculated, with no transparency about the assumptions used. The Topic paper does not comprehensively address these essential evidential matters, and it is also unclear whether this realignment can be achieved. If such an approach is required it needs to be supplemented with a mechanism to ensure its implementation and to be monitored closely. It should be supported by a policy which explicitly links the creation of jobs with houses. This approach is rightly not pursued in the Core Strategy because there is concern as expressed by the topic paper 15 at paragraph 12.15 that it would serve to 'constrain development' and 'constrain the ability to address the current acute need for housing'.</p> <p>The policy identifies 2250 new homes on strategic sites. For the size of settlement and its role as a strategic settlement it has a surprisingly low level of development. As paragraph 2.2 states 'Chippenham is one of the largest settlements in Wiltshire. It is a focus for employment growth due</p>

to proximity to M4, excellent access and transport links'. It is therefore surprising that it does not have a higher level of housing proposed, especially when compared with the other principle settlement of Salisbury which is identifying 3950 new homes on strategic sites and also the 1350 homes at Kings Gate Amesbury which is a market town.

The selection of sites in Chippenham has been complicated by considerable change in views of the planning department on the various sites. Tracing the history of the various options around the town demonstrates the contradictions that exist in this site selection process.

The Local Plan Inspector identified the site as a suitable location for development and recognised that it was the best site to be brought forward if necessary. Wiltshire 2026 consultation in 2009 opted for the preferred strategic sites to be a much larger site at land east of Chippenham and nothing to south. The land now allocated at the south west was previously dismissed in Wiltshire 2026 strategic sites background paper 2009 because "The land contains grade 1 agricultural land, is in a Minerals Safeguarding Area and is affected by a buffer zone for the sewage works. The smaller sites would be isolated without wider development taking place in the area."

However, this position changed and a larger site for the whole of the south west area was contained in the Sept 2011 consultation (both in options 1 and 2), although option 2 covered a smaller land area because it also included an area to the east of the town. Justification for its inclusion in 2011 seems to be that the Showell Farm employment site is a key site and can be delivered quickly, in order to link this to the Town Centre a sustainable urban extension should be proposed, and an area of search was proposed.

The previous proposals in Wiltshire 2026 identified 5,740 homes for the Community Area as a whole, of which 5,230 were proposed at Chippenham itself. This appears not to have been supported through the consultation event. The Topic Paper 15 refers to the examination of a number of population projection scenarios at a special Area Board meeting to determine what an appropriate figure might be. However, these scenarios are not explained in the documentation and there is no evidence based justification provided for the revised figure of 4,000 new homes, other than the consultation results that demonstrated objection to a high figure.

In the current proposal the strategic site has now been reduced in size and excludes Saltersford Lane site (indicated by a red circle on the map below) as well as the wider Hunters Moon area. Topic paper 14 at page 59 justifies this approach in terms of "the reduced housing requirement for Chippenham means that the entire site is not required". It is not agreed that this is the case (see separate comments on housing requirement) because there is no justification for a reduced level. As a consequence of requiring more dwellings across Wiltshire, further land will be required at Chippenham, because it is such an important strategic settlement. The Saltersford Lane site and wider Hunters Moon area has previously been recognised as a suitable site and should now be recognised by the Core Strategy as providing important housing able to be delivered in the short term. This could either be by including it as part of the South West Chippenham strategic site, and including it accurately in the list in the policy, or by recognising it as a separate deliverable site which makes an important contribution to short term housing delivery to support the Showell Farm employment allocation.

This site at Saltersford Lane is capable of being developed on its own or in conjunction with the wider area known as Hunters Moon for residential development to would provide a comprehensive development adjacent to the settlement in the most sustainable location. Bloor Homes are pursuing an adjacent site and representations on the larger site have been submitted on behalf of Bloor Homes and SLP. Both the smaller site and the larger site could be developed either separately or together as a sustainable and deliverable development to complement the employment strategy for Chippenham.

This site is on the edge of Chippenham and is well served by local facilities and bus services. It is adjacent to an employment site and other employment opportunities. It is within 0.5m of retail facilities including a supermarket, a nursery and a bus stop which provides regular half hourly services to Chippenham Town Centre, Bath and Corsham. It is also within 1mile of health facilities including Chippenham Community Hospital, a variety of schools and community facilities. The site has previously had permission for employment uses, however, this has not be renewed. Its use for housing would support the existing employment uses and allocations in the area and would provide a genuinely sustainable and deliverable

site. There are also no unusual constraints or infrastructure requirements which threaten the short term delivery of these sites.

Saltersford Lane site to be included within Core Strategy as a deliverable housing site

General policy wording

The policy is confusing because it includes a non strategic site at Abbeyfield School. It is not clear why this non strategic site is included and whether other non strategic sites should also have been considered and included within the policy. The table 5.4 includes the calculation of both these sites as making up the 2,400 figure as houses to be identified at strategic sites. This is patently wrong as it includes the 150 at Abbeyfield School which is a non strategic site.

The policy seeks to identify the appropriate development within the community area, however the Topic Paper 15 states that it is inappropriate to assess housing delivery at community area scale. This recognises that it is possible to have 'over-delivery at one location relative to others, without compromising the strategy'. While this might be a practical recognition of the artificial nature of boundaries it is not clear how this policy, and the other strategic policies deal with these conflicting approaches or how this will be monitored across the different community areas. Chippenham has a strong housing market and deliverability here could be achieved within the plan period.

The policy recognises that additional sites over and above the '330 remainder to be identified' could come forward as long as they consider the issues identified at paragraph 4.48. We support the recognition that the requirement as a minimum figure and other sites could be suitable, deliverable and contribute to achieving the sustainable development of urban extensions as part of the most appropriate spatial strategy for Chippenham. However, we are concerned that paragraph 4.48 refers to phasing to enable employment development come forward in advance of housing. There is no mechanism set out that identifies how this phasing would work in practice and what trigger mechanisms will be in place or how it is monitored. Any attempt to do this is contrary to the text of topic paper 15 which is referred to above and recognises the importance of not constraining the market in delivering much needed housing.

The Council's Housing requirement of 37,000 is not justified by the available evidence. As such a considerable amount of additional dwellings will need to be provided for in the Core Strategy. Chippenham is a key strategic settlement and should take a considerable amount of this new growth.

The current level of growth allocated towards this key settlement is not in line with its role as a strategic settlement for north Wiltshire as well as its employment ambitions. In order to demonstrate the current needs of the town it will be necessary to provide approximately 1,400 dwellings just to sustain its current population of 43,930 (2009). This is merely catering for the change in household size and does not reflect any increase in population. The low level of housing growth at Chippenham will have severe consequences for the achievement of economic development and jobs and also for the delivery of affordable housing which is a key priority for the Council as set out in their Corporate Business and Community plans.

The policy allocates only 2250 homes on strategic sites. This is far lower than was previously identified in the Wiltshire 2026 consultation and the previous consultation Draft June 2011. The justification for this is due to nothing less than a reduction in the overall housing requirement which is not justified and appears to be a consequence of realigning the figures to provide employment for local residents and seeks to reduce out commuting to zero – an aspiration that is totally unachievable. As discussed in reference to Core Policy 2 there is insufficient evidence provided about how this has been calculated, with no transparency about the assumptions used. The Topic paper does not comprehensively address these essential evidential matters, and it is also unclear whether this realignment can be achieved. If such an approach is required it needs to be supplemented with a mechanism to ensure its implementation and to be monitored closely. It should be supported by a policy which explicitly links the creation of jobs with houses. This approach is rightly not pursued in the Core Strategy because there is concern as expressed by the topic paper 15 at paragraph 12.15 that it would serve to 'constrain development' and 'constrain the ability to address the current acute need for housing'.

The policy identifies 2250 new homes on strategic sites. For the size of settlement and its role as a strategic settlement it has a surprisingly low

level of development. As paragraph 2.2 states 'Chippenham is one of the largest settlements in Wiltshire. It is a focus for employment growth due to proximity to M4, excellent access and transport links'. It is therefore surprising that it does not have a higher level of housing proposed, especially when compared with the other principle settlement of Salisbury which is identifying 3950 new homes on strategic sites and also the 1350 homes at Kings Gate Amesbury which is a market town.

The selection of sites in Chippenham has been complicated by considerable change in views of the planning department on the various sites. Tracing the history of the various options around the town demonstrates the contradictions that exist in this site selection process.

The Local Plan Inspector identified the site as a suitable location for development and recognised that it was the best site to be brought forward if necessary. Wiltshire 2026 consultation in 2009 opted for the preferred strategic sites to be a much larger site at land east of Chippenham and nothing to south. The land now allocated at the south west was previously dismissed in Wiltshire 2026 strategic sites background paper 2009 because "The land contains grade 1 agricultural land, is in a Minerals Safeguarding Area and is affected by a buffer zone for the sewage works. The smaller sites would be isolated without wider development taking place in the area."

However, this position changed and a larger site for the whole of the south west area was contained in the Sept 2011 consultation (both in options 1 and 2), although option 2 covered a smaller land area because it also included an area to the east of the town. Justification for its inclusion in 2011 seems to be that the Showell Farm employment site is a key site and can be delivered quickly, in order to link this to the Town Centre a sustainable urban extension should be proposed, and an area of search was proposed.

The previous proposals in Wiltshire 2026 identified 5,740 homes for the Community Area as a whole, of which 5,230 were proposed at Chippenham itself. This appears not to have been supported through the consultation event. The Topic Paper 15 refers to the examination of a number of population projection scenarios at a special Area Board meeting to determine what an appropriate figure might be. However, these scenarios are not explained in the documentation and there is no evidence based justification provided for the revised figure of 4,000 new homes, other than the consultation results that demonstrated objection to a high figure.

In the current proposal the strategic site has now been reduced in size and excludes Saltersford Lane site (indicated by a red circle on the map below) as well as the wider Hunters Moon area. Topic paper 14 at page 59 justifies this approach in terms of "the reduced housing requirement for Chippenham means that the entire site is not required". It is not agreed that this is the case (see separate comments on housing requirement) because there is no justification for a reduced level. As a consequence of requiring more dwellings across Wiltshire, further land will be required at Chippenham, because it is such an important strategic settlement. The Saltersford Lane site and wider Hunters Moon area has previously been recognised as a suitable site and should now be recognised by the Core Strategy as providing important housing able to be delivered in the short term. This could either be by including it as part of the South West Chippenham strategic site, and including it accurately in the list in the policy, or by recognising it as a separate deliverable site which makes an important contribution to short term housing delivery to support the Showell Farm employment allocation.

This site at Saltersford Lane is capable of being developed on its own or in conjunction with the wider area known as Hunters Moon for residential development to would provide a comprehensive development adjacent to the settlement in the most sustainable location. Bloor Homes are pursuing an adjacent site and representations on the larger site have been submitted on behalf of Bloor Homes and SLP. Both the smaller site and the larger site could be developed either separately or together as a sustainable and deliverable development to complement the employment strategy for Chippenham.

This site is on the edge of Chippenham and is well served by local facilities and bus services. It is adjacent to an employment site and other employment opportunities. It is within 0.5m of retail facilities including a supermarket, a nursery and a bus stop which provides regular half hourly services to Chippenham Town Centre, Bath and Corsham. It is also within 1mile of health facilities including Chippenham Community Hospital, a variety of schools and community facilities. The site has previously had permission for employment uses, however, this has not be renewed. Its use

	<p>for housing would support the existing employment uses and allocations in the area and would provide a genuinely sustainable and deliverable site. There are also no unusual constraints or infrastructure requirements which threaten the short term delivery of these sites.</p> <p>Saltersford Lane site to be included within Core Strategy as a deliverable housing site</p> <p>General policy wording</p> <p>The policy is confusing because it includes a non strategic site at Abbeyfield School. It is not clear why this non strategic site is included and whether other non strategic sites should also have been considered and included within the policy. The table 5.4 includes the calculation of both these sites as making up the 2,400 figure as houses to be identified at strategic sites. This is patently wrong as it includes the 150 at Abbeyfield School which is a non strategic site.</p> <p>The policy seeks to identify the appropriate development within the community area, however the Topic Paper 15 states that it is inappropriate to assess housing delivery at community area scale. This recognises that it is possible to have 'over-delivery at one location relative to others, without compromising the strategy'. While this might be a practical recognition of the artificial nature of boundaries it is not clear how this policy, and the other strategic policies deal with these conflicting approaches or how this will be monitored across the different community areas. Chippenham has a strong housing market and deliverability here could be achieved within the plan period.</p> <p>The policy recognises that additional sites over and above the '330 remainder to be identified' could come forward as long as they consider the issues identified at paragraph 4.48. We support the recognition that the requirement as a minimum figure and other sites could be suitable, deliverable and contribute to achieving the sustainable development of urban extensions as part of the most appropriate spatial strategy for Chippenham. However, we are concerned that paragraph 4.48 refers to phasing to enable employment development come forward in advance of housing. There is no mechanism set out that identifies how this phasing would work in practice and what trigger mechanisms will be in place or how it is monitored. Any attempt to do this is contrary to the text of topic paper 15 which is referred to above and recognises the importance of not constraining the market in delivering much needed housing.</p>
<p><b>What change(s) are necessary to make the DPD sound?</b></p>	<p>The policy as it currently stands is neither justified, effective nor consistent with NPPF. The housing requirement for Chippenham is too low and should be increased to recognise the role the town plays in the area. The housing requirement for Wiltshire as a whole is not based on robust evidence but is clearly too low to meet the housing requirement however calculated, or to present an integrated and implementable strategy and one which reflects the duty to cooperate. The overall housing provision figure in the plan will need to increase and there will need to be a consequent increase in the requirement to be delivered at Chippenham.</p> <p>The figure of 4000 stated for Chippenham in Policy CP10 should be increased therefore. Whilst the figure will have to reflect what is to be stated in an amended Policy CP2, this should be at least 5000.</p> <p>Policy CP10 should then demonstrate how the provision is to be made, though the policy is already confused by the inclusion of some non-strategic provision whilst not dealing comprehensively with how the entire provision will be made. All of this has to be sorted out, though at very least there has to be reference to further sites. The best location for additional sustainable and deliverable development is the Saltersford Lane site, which can be developed either separately or in conjunction with the wider Hunters Moon site. This should either be recognised as part of the strategic site at South West Chippenham as was previously considered and supported by the Council in their previous consultation September 2011, or by identifying it separately as a site which could deliver short term growth to support the economic objectives of the Council.</p> <p>The policy should be changed at least to make it clear that the reference to South West Chippenham includes land west of the railway line and east and west of Saltersford Lane, and that this combined area could accommodate at least 1300 dwellings with a corresponding amount of employment provision.</p>



	The area proposed for development needs to be identified in blue on the plan included as fig 5.4, and table 5.4 needs to be amended accordingly.
<b>Other comments</b>	
<b>Reasons for oral participation</b>	The issues involved in the consideration Chippenham Community Area and the suitability of sites for development is important in terms of the appropriateness of the strategy and its deliverability. Consequently they are best dealt with through discussion with a range of parties involved. In addition further evidence may become available which should be shared through the examination.
<b>Attachments</b>	2158838_0_1.rtf

<b>Comment ID:</b>	1132	<b>Consultee</b> Dr Nicholas Murry	<b>Agent</b>	<b>Person ID:</b> 544734	<b>Is the DPD legally compliant?</b>	
<b>Comment point</b>	Core Policy 10 The Spatial Strategy: Chippenham Community Area Policy		<b>Oral participation?</b>		<b>Is the DPD sound?</b>	
<b>Reasons for not legally compliant</b>						
<b>What change(s) are necessary to make the DPD legally compliant?</b>						
<b>Reasons for not sound</b>						
<b>What change(s) are necessary to make the DPD sound?</b>						
<b>Other comments</b>	<p>Democratic deficit Wiltshire Council has clearly not taken sufficient notice of the local community in Chippenham in developing its Core Strategy, most recently evidenced by its failure to reduce Chippenham's housing allocation of 4,500 (for the Community Area) and 4,000 for the town, by a single dwelling, since the last consultation held in August 2011.</p> <p>This is despite that fact that the vast majority of those present at public meetings and consultation workshops indicated that they want to see substantially lower housing numbers and did not believe that the high number options they were asked to vote for, were acceptable. Two of the workshops indicated that 1,500 new dwellings was a more appropriate number.</p> <p>At a key Wiltshire Council workshop held in the town on 14th March 2011, which included a wide range of different interests (including a significant proportion of college students, presumably invited to add opinion in favour of larger scale development), the majority of those present indicated that the preferred the total number of additional dwellings in the town to be somewhere between 770 and 2570, something which has not been included in the documentary evidence as having been the case.</p> <p>A number of surveys have also been carried out, including one by the Council's own Vision Board in February 2011, all of which have clearly indicated that the proposed scale of development is not wanted or believed to be justifiable by the town's inhabitants. Chippenham Community Voice, representing many of the local residents groups in Chippenham, undertook the largest survey of residents so far undertaken, the results of which demonstrated once again, a cross cutting and on-going opposition to the scale of development being proposed. (N.B. the questions were based on those previously asked by the Vision Board, so as to avoid any potential bias).</p>					

Chippenham Town Council, despite being under pressure to go along with the Core Strategy proposals, made a clear statement in August 2011, to the effect that it believed the housing numbers were too high and needed to be reduced (no reduction was made). The Chippenham Area Board has not come out in support of the Core Strategy and several Chippenham constituency 'Wiltshire councillors' have expressed their opposition and serious concerns about the scale and location of the proposed development. The Council needs to urgently consult with the local community in a meaningful way and take account of not only the strength of feeling against its plans but the soundness of what is being said, which in the long run will help it achieve some of its laudable aspirational statements on more resilient communities and sustainable development. One way of quickly achieving this and addressing the perceived democratic deficit (whilst at the same time gaining credibility and community buy-in, which would benefit both the town and the Council) would be to hold a referendum, with wording to be agreed by representative of the local community, to determine whether there is any support for its unjustifiable and unsustainable housing number proposals.

#### Failure to properly consider alternatives

Whilst the Council's rejection of the East of Chippenham option (encompassing Hardens and New Leazes farms) is demonstrably sound, other options, which were they included could remove the need to develop along the river altogether, have not been adequately appraised. These include land on the periphery of the A350 and land around Allington Farm. Moreover, some of the reasons given for rejection are not only inadequate but are also reasons for rejecting those sites that have been put forward (e.g. the fact that a site contains grade 1 agricultural land). Other options such as land near the M4 Junction 17 (available and ideal for employment land) and land at Hunters Moon, seem to have been rejected for arbitrary reasons.

The fact that considerable employment land already exists in Chippenham also seems to have been overlooked. For example, a recent survey found that up to a third of existing business park space in Chippenham is currently unutilised. And according to the Estates Gazette there is approximately 170,000 square feet of empty office space within the Chippenham area. This corresponds to type B1 (Retail and Office) which according to Future Employment Needs in Wiltshire, Wiltshire Council, April 2011 is precisely the type of industrial expansion currently needed in the town; see: [http://www.wiltshire.gov.uk/future\\_employment\\_needs\\_in\\_wiltshire\\_\\_april\\_2011\\_.pdf](http://www.wiltshire.gov.uk/future_employment_needs_in_wiltshire__april_2011_.pdf)

Brownfield sites do not seem to have received serious consideration, in contravention to the Government's National Planning Policy Framework, which states brownfield sites need to be selected ahead of greenfield ones. In particular, Langley Park could receive a much higher density of housing, which when combined with housing on some of particularly suitable smaller sites, could significantly remove the need for greenfield development, potentially removing the socially and environmentally damaging Rawlings Farm proposals altogether.

#### Delivery

The Delivery Strategy seems to be fundamentally flawed in a number of respects. Firstly, allowing developers to build substantial numbers of houses, which are not locally needed and will generate private profits at the expense of the existing community, is unacceptable.

Local housing need, according to the Council's own analysis, does not imply anything like the numbers of dwellings currently being proposed. If the current housing numbers are adopted, the result will be large scale in migration from other areas, more competition for local employment, pressure on local services provision and a substantial increase in out-commuting.

The strategy seems to have been designed around land area rather than numbers of jobs and does not indicate the type of business or industry that is planned for. Warehouses may create almost no new jobs, for example, whilst creating traffic congestion and greenhouse gas emissions. Certain industries will require their workforce commute into the area and others may increase congestion, pollution and adverse human health and environmental impacts for very limited local benefit. Ignoring the number and type of employment opportunities is not acceptable.

I am informed that the 'employment led development' that could help ensure local employment becomes a priority and could limit excessive housing being built with no link to local employment, has now been abandoned as a strategy. Building houses ahead of providing employment opportunities will mean that in-commuting and out-commuting substantially increase, with consequent adverse impacts in terms of greenhouse gas emissions, congestion and economic decline of town centre. Under the current strategy, there is very little to stop this happening.

There is also a dependency on the Council obtaining sufficient section 106 and/or Community Infrastructure Levy funding in order to meet critical infrastructure requirements. Such reliance on developer charges have failed to achieve sufficient funds for the necessary infrastructure in the past and are even less unlikely to do so in the current economic circumstances, which may persist for some time. The result will be greater strain on existing infrastructure, in particular for the town's already overcrowded roads.

In terms of the spatial strategy referred to in Core Policy 10; the selection of Option 2 flies in the face of the consultation responses the Council received in August 2011: out of 567 consultation responses, 16 expressed a preference for Option 1, and only 7 expressed any preference for Option 2 (which includes the Rawlings farm strategic site), several of these coming from developers with a vested interest in the site.

The Rawlings Farm strategic site, extending along the banks of the River Avon almost as far as Langley Burrell, represents a pristine area of countryside and a valuable natural asset - the closest thing Chippenham has to an Area of Outstanding Natural Beauty. It is unsuitable for development for a number of reasons:

It would result in substantial carbon emissions as a result of the 'in-migration' of 'out commuters' (i.e. the main reason for locating here would be to take the train or the M4 to other places of employment such as London, Bristol or Swindon), which also directly contradicts the Council's exiting policies on climate change and out-commuting.

It would also result in substantially more pressure on the existing road and rail network, with very limited opportunity to mitigate this.

There would be particularly adverse consequences for traffic congestion, since traffic coming from what will be a very large housing estate, plus business park or industrial units, would enter and exit the town via Cocklebury Road and Station Hill, creating noise, pollution and bringing traffic to a halt at busy times of day.

The risk of flooding would be further increased as a result of the substantial amount of run-off from the development, something that will increase over time with the increasing intensity of rainfall events. The extent of sustainable urban drainage required to offset does not seem to have been considered and would likely be impractical and unaffordable, even if feasible.

There would be a significant loss of valuable grade 1 and 2 agricultural land; not sensible given the increasing need for national and local food production, in the face of changing climatic conditions.

There would be impacts on the groundwater and aquifer recharge, creating water stress for the river and surrounding environment and increasing the level of pollution in the river, affecting current users such as walkers, anglers, canoeists, as well as fish and wildlife.

There would be substantial and irreversible impacts of biodiversity and the ecosystem services currently provided by the land and river, including habitats fragmentation and impacts on protected species.

The public amenity enjoyed by walkers, anglers, canoeists and others, will be adversely impacted, for both the existing user population and the wider (and future) population of Chippenham. This would also extend downstream due greater fluctuations in water level and the pollution that would result from a development of this scale so close to the river.

Many of these impacts are reiterated in the Council's own Sustainability Appraisal of Option 2, including increased greenhouse gas emissions (which would be worse for this site than alternative sites for the reasons given above), loss of valuable grade 1 and 2 agricultural land and adverse impacts on water quality and groundwater recharge.

**Conclusion**

In conclusion, the Core Strategy proposals for Chippenham need to reduce the housing numbers substantially to come in line with local needs and the vision of the local population. House building should be properly linked to phased local employment provision and should avoid allowing the town to sprawl into the countryside, increasing out commuting, putting pressure on transport and other infrastructure and providing little benefit to the local community (and considerable costs to some parts of the community, in particular).

There are better alternative sites around Chippenham than alongside the River Avon, which would not cause the depth and scale of adverse effect described above. The Rawlings Farm site should therefore be withdrawn from the Core Strategy, alternative sites away from the river considered properly and greater emphasis placed on denser, affordable housing on exiting brownfield sites such as Langley Park, removing the need to destroy countryside, farmland and damage one of Chippenham's most valuable natural resources, the River Avon

**Reasons for oral**

<b>participation</b>	
<b>Attachments</b>	

<b>Comment ID:</b>	1173	<b>Consultee</b> Monkton Park Residents Group Monkton Park Residents Group	<b>Agent</b>	<b>Person ID:</b> 646016	<b>Is the DPD legally compliant?</b>	
<b>Comment point</b>	Core Policy 10 The Spatial Strategy: Chippenham Community Area Policy Core Policy 10		<b>Oral participation?</b>		<b>Is the DPD sound?</b>	
<b>Reasons for not legally compliant</b>						
<b>What change(s) are necessary to make the DPD legally compliant?</b>						
<b>Reasons for not sound</b>						
<b>What change(s) are necessary to make the DPD sound?</b>						
<b>Other comments</b>	<p>Core Policy 10 - the Spatial Strategy : Chippenham Community Area . We regard this policy to be fundamentally flawed in a number of crucial respects.</p> <p>Firstly, the proposed areas of employment land and the proposed numbers of dwelling are far too high, as has been consistently highlighted by the local community and even the Town Council, who at the last consultation in August 2011, stated (in their official response) that they would like to see the numbers reduced. Wiltshire Council has clearly not taken any notice of the local community or its elected representatives by failing to reduce the allocation of 4,500 by a single dwelling, since the last consultation.</p> <p>Further evidence of this includes consultation workshops at which participants consistently indicated that they would like to see substantially lower housing numbers. This includes a Wiltshire Council workshop held in the town on 14th March 2011, which included a wide range of different interests (including a significant proportion of college students), the majority of whom indicated that the total number of additional dwellings in the town should be somewhere between 770 and 2570 (rather than 4,500).</p> <p>A number of surveys have also been carried out, including one by the Council's own Vision Board in February 2011, the results of which have clearly indicated that the proposed scale of development is not wanted or believed to be justifiable by the town's inhabitants.</p> <p>Chippenham Community Voice, representing many of the local residents groups in Chippenham, undertook the largest survey of residents so far undertaken, with questions based on those previously posed by the Vision Board, the results of which demonstrated, a cross cutting and on-going opposition to the scale of development being proposed.</p> <p>Monkton Park Residents Group undertook its own survey of more than 1,000 residences, covering the majority of the population in this part of the town, with 93% of respondents indicating that they disagreed with the scale of development being proposed and 94% objecting to green field development. The survey had a response rate of nearly 44% (470 residences out of 1,078). The results of this survey are available on request.</p> <p>Secondly, there has been a failure to properly consider alternative sites put forward by the community or widely supported at previous consultation workshops, such as land close to the Bristol Road around Allington Farm, land to the north of Cepen Park North and land around Junction 17 (for</p>					

employment purposes).

The grounds for dismissing these sites, which have many advantages over developing along the River Avon corridor, are incomplete and insufficient (e.g. one site is dismissed because it has some grade 1 agricultural land, whilst the Rawlings Farm site has far more such high quality farmland). Far more houses could also have been incorporated on existing brownfield sites such as Langley Park, which it is now rumoured could see yet another supermarket (with all the consequent damage which that will do to the town centre).

Thirdly, the selection of Option 2 flies in the face of the consultation responses the Council received in August 2011: out of 567 consultation responses, 16 expressed a preference for Option 1, and only 7 expressed any preference for Option 2 (which includes the Rawlings farm strategic site), several of these coming from developers with a vested interest in the site.

Fourthly, the Rawlings Farm strategic site allocation, extending along the banks of the River Avon, almost as far as Langley Burrell, is a pristine area of countryside - probably the closest thing Chippenham has to an Area of Outstanding Natural Beauty - and a valuable natural asset.

It is unsuitable for development for a number of reasons, including:

a.) Development of this site would result in substantial carbon emissions (and substantially larger than alternative sites), as a result of the 'in-migration' of 'out commuters'. In other words, the main reason for locating here would be to take the train or the M4 to other places of employment (e.g. London, Bristol, Bath or Swindon), in direct contradiction to the Council's existing policies on climate change and out-commuting.

b.) This would of course also result in substantially more pressure on the existing road and rail network, with very limited (or zero) opportunity to relieve this.

c.) There would be a particular further impact for Monkton Park, since traffic coming from what will be a very large housing estate, plus the business park or industrial units, will enter and exit the town via Cocklebury Road and Station Hill, even if a crossing is built over the railway line, turning what is already a congested road into a virtual car park at certain times of day;

d.) A significant area of valuable grade 1 and 2 agricultural land would be lost from the Rawlings farm site, which according to Defra/ Natural England would be objected to by them in the strongest terms under normal circumstances. Here again the consequences of climate change, which will require more and more local food supply, have been ignored by the Council in their site selection;

e.) The risk of flooding, which is already significant in some parts of Monkton Park (as evidenced by an increase in the number of households unable to obtain insurance, which continues to rise) will be increased further, as a result of the substantial amount of run-off from the development, something that will increase as the impacts of climate change materialise (more intense rainfall events). The extent of sustainable urban drainage required to offset this would be impractical and unaffordable, even if technically feasible.

f.) There would be significant impacts on the groundwater and aquifer recharge, creating water stress for the river and surrounding environment and increasing the level of pollution in the river, affecting a large number of current users such as anglers, canoeists, as well as fish and wildlife.

This would be further exacerbated by climate change;

g.) There would be substantial and irreversible impacts of biodiversity and the ecosystem services currently provided by the land and river Habitats would be fragmented, species lost and protected species significantly impacted.

h.) The public amenity that exists along this part of the River Avon, for walkers, anglers, canoeists and others, will be adversely affected, at the expense of the existing user population and wider population of Chippenham. This will extend to other parts of the Avon that are likely to be affected by the greater fluctuations in water levels and the pollution that would result from a development of this scale so close to the river;

Many of the significant adverse impacts mentioned above are reiterated in the Council's own Sustainability Appraisal of Option 2, including increased greenhouse gas emissions (which would be worse for this site than alternative sites for the reasons given above), loss of valuable grade 1 and 2 agricultural land and adverse impacts on water quality and groundwater recharge.

For all these reasons, the residents of Monkton Park do not want to see development along the River Avon corridor, on either side of the river, and consider that the Rawlings Farm site should be withdrawn from the Core Strategy forthwith.

We consider that there are far better alternative sites around Chippenham that would not cause this scale and seriousness of impact, some of which have been dismissed for reasons that are difficult to understand, given their availability and suitability for development, and the relative lack of impacts compared to the Rawlings Farm site (e.g. Hunters Moon). 5

We also believe that much more of a brown field first policy is needed and that sites such as Langley Park could accommodate far more dwellings

	than are currently being proposed, removing the need to permanently destroy pristine countryside, high quality agricultural land and negatively impact one of Chippenham's most valuable natural resources, the River Avon.
<b>Reasons for oral participation</b>	
<b>Attachments</b>	

<b>Comment ID:</b>	1698	<b>Consultee</b> Unknown Bloor Homes	<b>Agent</b> Jonathan Porter Barton Willmore	<b>Person ID:</b> 556573 556577	<b>Is the DPD legally compliant?</b>	No
<b>Comment point</b>	Core Policy 10 The Spatial Strategy: Chippenham Community Area Policy CP10		<b>Oral participation?</b>	Yes	<b>Is the DPD sound?</b>	
<b>Reasons for not legally compliant</b>						
<b>What change(s) are necessary to make the DPD legally compliant?</b>						
<b>Reasons for not sound</b>	<p>3.1 We have highlighted in relation to the spatial strategy, the Council's overriding focus on delivering employment land and jobs first. We are concerned by the extent to which this has determined the choice of strategic allocations in Chippenham.</p> <p>3.2 The three proposed strategic allocations of North Chippenham, Rawlings Green (East Chippenham) and South West Chippenham are very large sites which include and are aligned to employment area. It is interesting that here in Core Policy 10, contrary to Core Policy 2, Showells Farm has been subsumed within the South West Chippenham allocation.</p> <p>3.3 The Council's apparent formula for trying to wed employment development to the residential allocations would seem to be at the expense of other stated Strategic Objectives such as enhancing the natural, historic and built environment, providing new homes and addressing climate change.</p> <p>3.4 Topic Paper 12 provides background to the site selection process and acknowledges the effects that the proposed strategic allocations will have on the natural, historic and built environment. This includes impacts on ecology and biodiversity (Birds Marsh Wood and the River Avon corridor) and the historic environment (Listed Buildings, a Scheduled Monument and Rowden Conservation Area).</p> <p>3.5 It is also notable how there has been significant public objection to the allocations. Consultation responses have been particularly concerned by the potential impact on Birds Marsh Wood and Rowden Conservation Area. By contrast Topic Paper 12 notes that there have been few comments in relation to Hunters Moon.</p> <p>3.6 The Development Templates for the proposed Strategic Allocations in Appendix A of the draft Core Strategy indicates the essential infrastructure that need to come forward to enable the delivery of each site. This includes major new transport connections and large country parks required to reduce the impact on the River Avon.</p> <p>3.7 Aligned to this is the stated key objective (in keeping with the strategy of the Council) that housing development will be phased to enable employment development to come forward in advance of further residential development. The implication and apparent hope of the Council is that by associating employment with residential development of the proposed strategic allocations, it will help with phasing and cross subsidisation. This is an artificial and naïve approach. Experience does not support this view and there is no evidence to suggest that it is workable in the long term.</p> <p>3.8 The essential infrastructure and employment uses of the proposed Strategic Allocations will slow the delivery of housing and place a financial burden which could compromise the level of affordable housing and sustainability of the developments. The draft Core Strategy proposes that both affordable housing (Core Policy 43) and sustainable construction and low-carbon energy (Core Policy 41) will be subject to viability.</p> <p>3.9 The errata to the Annual Monitoring Report 2010-11, which forms part of the evidence base provides the amended housing land supply figures</p>					

for North Wiltshire. In relation to the housing requirement proposed by the Core Strategy Table 1 indicates 5.8 years of deliverable supply. Table 2 compares the housing land supply with the requirement of the Proposed Changes of the RS and indicates 3.2 years for Chippenham. This illustrates the marginal nature of the proposed housing land supply compared to need.

3.10 The Core Strategy needs to make reference to the ability to develop and deliver the sites (and the Council should satisfy itself in this respect to ensure a robust housing trajectory). We are not convinced that the Council can ensure the delivery of the purported supply from the proposed Strategic Allocations.

3.11 The strategy for Chippenham is heavily reliant on the three large proposed strategic allocations which as set out above are far from straight forward to deliver. Experience indicates that sites of this nature do not come forward quickly. This will be particularly true in the face of public opposition and the need to satisfy the duties of the Localism Act.

3.12 The previous draft of the Core Strategy provided two options for the location of future growth in Chippenham. Both rightly included the land at Hunters Moon (and for that matter Abbeyfield school) as sites for housing and community uses within the areas of search. Both sites were examined at the North Wiltshire Local Plan 2011 inquiry in 2005 and the Inspector concluded that they were suitable for development. Therefore, if the Council were to consider development sites within the areas of search, clearly these two sites should be allocated to come forward first.

3.13 In relation to Hunters Moon, the Local Plan Inspector, considering the use of the whole site for housing and employment, commented: "I accept that the area is not constrained in terms of agricultural quality. Nor is it of significant landscape quality and it is not an area of environmental protection. Its development would not have a significant effect on the landscape of the area or the setting of the town, subject to the small hill at the centre of the area remaining undeveloped."

(para 10.106)

"However, having regard to the availability of employment and housing land within the town and the allocations made within the RDDLP, to allocate the extensive objection site for mixed use development at the present time could result in the Structure Plan requirements being exceeded. Consequently, while I recognise the development potential of the Hunters Moon area, I consider the allocations made in the RDDLP to be appropriate and no additional land in the area should be allocated for development at the present time."

(para 10.107)

3.14 The Inspector was therefore satisfied that the site was suitable for mixed use development, acknowledging that it had few constraints to development, but considered that there was no need for the site at the time.

3.15 Since the Local Plan inquiry, Bloor Homes has promoted the site for solely residential use which we considered was more appropriate. Bloor Homes confirmed the sites availability in representations on the Core Strategy in August 2011 and provided a draft Concept Statement which illustrated how it could provide in the region of 650 dwellings without significant constraint. Bloor Homes have said to officers at the Council that they are happy to explore mixed-use development options for the site, but officers have not indicated that this would be preferable.

3.16 Despite the above, the revised draft of the Core Strategy omits the site from the proposed strategic allocations.

3.17 Page 19 of Topic Paper 12 provides a table which summarises the Council's strategic site selection process. On the outcome it states that: "Option 2 is being taken forward as it offers the best opportunity to achieve the strategy for Chippenham, ensure employment land is delivered with housing and community facilities alongside"

3.18 This could not be clearer on the overriding focus of the Council in the site selection process. Not that they offer the most sustainable solution, not that they will have the least impact on the environment, or that they meet with the greater public support, but that they are perceived as the best way to delivery employment land with housing.

3.19 In relation to Hunters Moon, paragraph 11.35 of Topic Paper 12 states that:

"Although Hunters Moon and Saltersford Lane sites would provide an opportunity to round off development to the west of Chippenham and help to meet the strategic housing requirement for Chippenham, it is unclear what further benefits they will have for the town and to meet the strategy set

out in the Core Strategy and the vision objectives."

3.20 We would question the Council's approach whereby the most appropriate site for sustainable residential development which could come forward without significant environmental harm or public objection needs to deliver further benefits. It appears that the site has fallen foul of the Council's bias towards delivering employment land and the

'formula' that it has invented to do so.

3.21 As part of the evidence base to support the Core Strategy the Council has produced a Sustainability Appraisal of the options. The Appraisal states at paragraph 5.12.69 that:

"it is considered that there are no absolute constraints to development in sustainability terms for any of the options and at any individual location"

But paragraph 5.12.15 states that:

"Key issues in Chippenham which need to be resolved before development takes place are traffic (particularly the A4 through the town and the A350) and potential impacts to the River Avon."

3.22 Hunters Moon and land north of Saltersford Lane do not affect the River Avon and are located adjacent to the southern section of the A350 which is less affected by traffic. There are therefore no sustainability grounds not to bring forward the sites as a Strategic Allocation. We attach as Appendix 2 of these representations a transport technical note by FMW Consultancy Ltd which models scenarios for growth in Chippenham and concludes that Option 1 (which includes Hunters Moon) would have least traffic impact and unlike other options would not require significant mitigation.

3.23 Figure 5.4 in the draft Core Strategy and included in Appendix 1 illustrates the proposed strategic allocations. As indicated by paragraph 11.35 of Topic Paper 12, Hunters Moon and Saltersford Lane are conspicuous by their absence from the proposed built area within the A350.

3.24 Bloor Homes and its consultants have prepared an updated draft Concept Statement for Hunters Moon which is provided with these representations. The Statement supports the opportunity to deliver a sustainable and integrated development on the south western edge of Chippenham. It also illustrates that the site is available for early development.

3.25 The development can also link into development north of Saltersford Lane (the subject of separate representations) which is illustrated by the Draft Concept Statement. The proposals are complementary, but can come forward independently (which was confirmed by both representations at the last stage).

3.26 The Concept Statement has been updated to include additional options for the development of the site in light of comments received from officers and also to illustrate the potential to include an element of employment use. The options illustrate that the land north of Saltersford Lane and Hunters Moon could deliver between 500-725 dwellings with a primary school and up to 4 ha of employment land (including circa 100 dwellings on the Saltersford Lane site).

3.27 Figure 5.4 above and the Concept Statement illustrate how the Hunters Moon site is well located in relation to the existing Principal Employment Location at Methuen Park but also the proposed employment area at Showells Farm. The illustrative concepts indicate how pedestrian and cycle links could be created between the sites to enhance connectivity.

3.28 Core Policy 2 identifies Showells Farm as an independent site and evidence suggests that it is deliverable in its own right. The development of Hunters Moon and land at Saltersford Lane would complement the development of Showells Farm which could come forward without the need to develop the land at South West Chippenham for residential use. This would preserve the green wedge on this side of the town and overcome the objections to its development on the grounds of its impact on the natural and historic built environment.

3.29 The lower overall housing figures in the draft Core Strategy places greater emphasis on the identified sites to delivery the required housing trajectory. We are concerned that the basis of the draft Core Strategy is unsound because the site selection process is not based on a balanced interpretation of the evidence and that the proposed Strategic Allocations at Chippenham will not deliver the required number of new homes in accordance with the trajectory.

3.30 The implication of delays to the adoption of an up to date development plan is that the district will have an extended period without a clear



	framework for determining planning applications to meet the housing need. This would lead to the piecemeal development of housing and infrastructure.
<b>What change(s) are necessary to make the DPD sound?</b>	3.31 We submit that Hunters Moons remains the most appropriate location to deliver significant additional new homes early in the plan period. The Council will need to justify the overall level of housing provision for the district and the other sites where it should be located. 3.32 To reduce the risk of the Core Strategy being found unsound the Council should reinstate Hunters Moon as a Strategic Allocation to help ensure an adequate supply of housing early in the plan period. This change could be consulted on along with any changes resulting from the review following the publication of the NPPF.
<b>Other comments</b>	
<b>Reasons for oral participation</b>	We consider the scope and implications of our representations warrant participation at the Examination.
<b>Attachments</b>	2167519_0_1.pdf  2167581_0_1.pdf

<b>Comment ID:</b>	1726	<b>Consultee</b> Unknown Crest Strategic Projects Limited & Redcliffe Homes Ltd	<b>Agent</b> Mr Desmond Dunlop D2 Planning Limited	<b>Person ID:</b> 392725 558013	<b>Is the DPD legally compliant?</b>  <b>Is the DPD sound?</b>	Yes  Yes
<b>Comment point</b>	Core Policy 10 The Spatial Strategy: Chippenham Community Area Policy Core Policy 10		<b>Oral participation?</b>	Yes	<b>Reasons for unsound</b>	
<b>Reasons for not legally compliant</b>						
<b>What change(s) are necessary to make the DPD legally compliant?</b>						
<b>Reasons for not sound</b>						
<b>What change(s) are necessary to make the DPD sound?</b>						
<b>Other comments</b>	1. CONTEXT 2. CREST STRATEGIC PROJECTS 3. REDCLIFFE HOMES LIMITED 4. SOUTH CHIPPENHAM-HELPING TO DELIVER THE VISION FOR WILTSHIRE 5. SUITABILITY AND DELIVERABILITY OF SOUTH WEST CHIPPENHAM 6. SOUTH WEST CHIPPENHAM MERITS 7. RECOMMENDATIONS					

DOCUMENTS attached

1. Vision Statement
2. Landscape and Visual Assessment by Cooper Partnership
3. Agricultural Land Use
4. Biodiversity
5. Cultural Heritage
6. Flood Risk
7. Land Contamination
8. Noise
9. Key Infrastructure and Services
10. Transportation
11. Employment Issues
12. Geology and Mineral Resources
13. Air Quality
14. Renewable Energy

1. CONTEXT

1.1. This report has been prepared on behalf of Crest Strategic Projects (CSP) and Redcliffe Homes Limited (the promoters) in response to Core Policy 10 Spatial Strategy Chippenham Community Area and in particular that part of the policy which identifies South West Chippenham as a strategic expansion area comprising 18ha of employment and 800 dwellings.

1.2. Crest and Redcliffe Homes are the preferred development partners for a consortium of landowners and their agents specifically formed to promote and deliver a sustainable extension to South West Chippenham. They consider that such an expansion offers considerable merits over all other development options around Chippenham in that it has:

i) The potential to integrate development without adverse impact;

iii) The potential to provide strategic employment opportunities as an early phase of development;

iv) The potential to improve recreational, and biodiversity interests along the River Avon corridor.

v) The availability of existing infrastructure; and

vi) The ability to respect and enhance cultural heritage issues.

1.3. CSP initially submitted representations in September 2008 in respect of the then North Wiltshire District Council's intention to prepare a Development Management Note for possible options for growth around Chippenham. Furthermore, both companies submitted representations to the 2009 Consultation exercise in respect of possible options for growth around Chippenham.

1.4. In addition, the promoters submitted a Delivery Statement in May 2011 to indicate the broad land uses including likely quantum of development as well as the Wiltshire Core Strategy Pre Submission Document (February 2012 deliverability and phasing for a proposed southern expansion comprising up to 2,500 dwellings, employment etc and a southern link road).

1.5. Finally, they submitted representations to the Wiltshire Core Strategy Consultation Document in June 2011. These representations indicated why a southern expansion of the town had significant advantages and benefits over other options.

1.6. Crest & Redcliffe are therefore pleased to see the land within their control has been recognised by the Council as representing part of the strategy for meeting future employment and housing needs in Chippenham in the period up to 2026 (albeit they consider that the period for the Core Strategy should be extended to 2013).

1.7. The promoters welcome the opportunity to submit further representations in respect of the Wiltshire Core Strategy Consultation Document. They support in principle Core Policy 10 Spatial Strategy Chippenham Community Area which identifies South West Chippenham for 18ha of employment land and 800 dwellings. These representations will provide a summary of the technical work that has been undertaken to date which underpins the Core Strategy's justification for this allocation and confirms that the allocation is deliverable.

1.8. The Vision Statement prepared by NEW identifies the possible concept for this quantum of development. (Document 1)

## 2.CREST NICHOLSON

2.1. Crest Nicholson is a leading developer of sustainable communities with an established record of delivering innovative, inspiring developments with close attention to detail. They are dedicated to excellence in design and construction, to providing high quality locations and to customer service. Each of their schemes has, as its main focus, the potential to generate a true community spirit through the incorporation of key features. These include distinctive residential areas with their own character and identify generous areas of open space, and central amenities such as school, shops and sports facilities.

2.2. Their work in the field of sustainable development has been recognised by a number of awards. Crest was the industry's first representative in the Business in the Community 'Companies that Court Top 100'. They were ranked joint first by WWF (the global environmental organisation) and Insight Investment for their demonstrable commitment to sustainable development. More recently Crest has been awarded the Queen's Award for Enterprise for their contribution to sustainable development. Awards for their developments include three CABA Building for Life Gold Standard awards.

2.3. Crest Nicholson has increasingly adopted a 'concept' scheme approach to development whereby real communities are created. Innovative development design contributes to the creation of the sense of identify and belonging embodied in their schemes.

2.4. Crest is working with BioRegional Quainton to deliver two of the Country's first economically viable zero carbon schemes. In February 2007, their joint venture won the contract to develop the One Gallions residential development, the Mayor of London's Zero carbon exemplar scheme, the Royal Docks. In the same month planning permission was granted for the New England Quarter sustainable

community in Brighton. Both schemes have been developed in accordance with the ten 'One Planet Living' principles, established to provide the most environmentally advanced developments in the UK.

## 3;REDCLIFFE HOMES

3.1. They were established in 1984 to develop desirable homes in sought after locations for the discerning individual. They focus their efforts and energies on developing a select number of individually designed schemes in carefully chosen and often sensitive locations, to create quality homes appropriate for their environment and setting.

3.2. Over the years they have developed a wide range of housing from Italianate villas in the grounds of listed buildings to bespoke scheme within the Cotswolds and the World Heritage City of Bath.

3.3. Their experience covers the refurbishment of listed buildings, the redevelopment of brownfield sites and the creation of schemes within Conservation Areas and similarly sensitive locations.

3.4. Current schemes include the refurbishment of a Grade 1 listed building in Sherbourne, Dorset and the redevelopment of a brownfield site within the village of Pewsey.

3.5. Their sympathetic approach to design has secured two National Housing Design Awards for their developments in the cathedral City of Wells and in the Cotswolds village of South Cerney, together with a host of quality and health and safety awards for their work.

3.6. Perhaps the best testament to their commitment to quality, however, can be seen from examples of their work, which demonstrate not only their skills and experience but also their enthusiasm and passion for the built environment.

3.7. Crest and Redcliffe's vision for South Chippenham embodies principles of sustainability, design and community building. Their experience and track record underpins their commitment to delivering a development that fulfils this vision.

3.8. Both companies have experience of undertaking development in Chippenham.

Crest assembled and promoted the western expansion of Chippenham known as Cepen Park during the 1980's and 1990's. This development comprised some 1,100 dwellings as well as substantial components of the town's eastern bypass.

Whilst Redcliffe have recently completed a scheme of 40 dwellings at Rowden Lane known as "Brooklands".

4.1. CSP and Redcliffe are generally supportive of the Vision for Wiltshire and Chippenham in particular. They believe that development to the South of Chippenham has the potential to make a significant contribution to the strategy, objectives and overall vision for Chippenham.

4.2. The Core Strategy recognises the key challenges for Wiltshire over the next 15-20 years. Providing jobs locally and promoting the economic growth of Wiltshire is a significant challenge given the size and rural nature of the County. Chippenham has a big role to play in generating jobs

locally and taking advantage of Wiltshire's position in the prosperous northern part of the South West region. Land south of Chippenham at Showell Farm is identified for large scale employment development and can help to make a significant contribution to Wiltshire's economy moving forward.

4.3. This applies not only to the creation of employment land but also to the delivery of housing, also recognised as a key challenge. If housing supply is not able to match local demand, it is younger and more vulnerable members of Wiltshire's existing community that will find it difficult to afford house prices or rents. This will put strain on local social housing or force younger people to leave the area they grew up in. Development of housing as identified in south of Chippenham next to the employment land is clearly the most sustainable way of accommodating this housing growth and adapting to minimise the future impact on climate change.

4.4. The promoters strongly advocate that development at Rowden and Patterdown and Showell Farm has the potential to add the greatest benefit for existing residents of Chippenham that are unique to the south. Through the retention and creation of jobs in the town, through the enhancement of a significant environmental and informal leisure area in the River Avon Corridor green park and by providing better walking and cycling links to Lackham College helping to draw it into the town.

4.5. Allied to opportunities to provide new walking, cycling and public transport links to Chippenham Town Centre, development south of Chippenham can make the most of Chippenham's existing transport infrastructure, improving it as necessary and avoiding significant road building projects which would require significantly higher levels of growth to be viable. This will release planning obligations for social, green and environmental on site facilities, which could otherwise be tied up in delivering very expensive enabling infrastructure.

4.6. Land south west of Chippenham represents clearly the best option for expanding Chippenham that is most sustainable, deliverable and capable of providing benefits for existing communities whilst meeting the objectives of the draft Core Strategy. This is recognised in the Topic Paper 12 "Site Selection" which states

"The South West Area of Search was identified in Core Policy 5 of the Core Strategy Consultation Document 2011 to deliver either 1,500 houses and 28ha employment land as part of Option 1 or 800 houses and 28ha employment land as part of Option 2. The site selection process and consultation document acknowledged that part of the area is within Corsham Community Area rather than Chippenham Community Area but this is not a valid planning policy consideration in the selection of strategic sites for Chippenham.

The area of search is Greenfield land, but is not designated Green Belt land and it is not located within or adjacent to the designated Lacock Conservation Area. Therefore the proposals for Chippenham will not have a detrimental effect on the village of Lacock's natural surroundings. Lacock Village is recognised in the Core Strategy as having buildings of architectural merit and being an important tourist destination in the Corsham Community Area. It is felt that although the proposal for an area of search south west of Chippenham includes land within the administrative boundary of Lacock Parish, it will not have a detrimental impact on those factors.

The Area of Search includes land in the Rowden and Patterdown area (i.e. west of the River Avon), but does not include Land South of Pewsham (East of the River Avon). This land has been promoted and

because the reduced housing requirement for Chippenham means that the entire site is not now required.

A principal reason for including the South West Area of Search as part of the options was due to the strategically important employment site at Showell Farm being located within this area. This site was recognised by participants during the Chippenham Workshop in March 2011 as being the largest potential employment site at Chippenham and one which if developed could meet the employment needs of the town. This site offers the best potential to provide for significant job and business growth (i.e.

it would help to retain existing local businesses seeking to expand) at the town due to its location and easy access point adjacent to the A350. However, it has been previously recognised as part of the site selection process, that on its own it is divorced from the town centre and therefore should form part of a high quality, sustainable urban extension to Chippenham, which needs to be fully integrated to the town and town centre, including via the River Avon corridor.

Since the consultation questions have been asked about the deliverability of Showell Farm, Members of the local community fear the site will be an example similar to Hunters Moon, whereby the site won't be marketed on an equitable basis and eventually the developer will seek to change the allocation to an alternative use such as housing or retail.

It is necessary to be able to demonstrate that all the strategic allocations in the Core Strategy are deliverable. Officers have been in contact with the developers who are promoting Showell Farm. The developer has now confirmed in writing that they are fully committed to delivering

employment land at Chippenham. This is available to view at <http://wiltshire.gov.uk/planninganddevelopment/planningpolicy/planningpolicyevidencebase.htm>. In addition, funding has recently been secured by Wiltshire Council to enable the delivery of Showell Farm. Showell Farm was identified as a potential site of 28ha in the summer consultation document. Community groups have questioned the validity of this site area. The developers promoting the site confirmed that their freehold ownership is approximately 18ha. It has always been recognised that the Showell Farm employment site contains listed buildings. The Council is of the opinion that a lower site area with appropriate landscaping will ensure the setting of the listed buildings is not affected by development. Therefore, it is proposed that Showell Farm remains as a strategically important employment site for Chippenham which once developed will help to redress the issue of out-commuting of the town and help to ensure Chippenham becomes a vibrant business location. The site area will be 18ha.

The South West Area of Search also includes the Rowden Conservation Area, the River Avon and its floodplain. During the site selection process in recognition of these factors, a Country Park was included on the proposals map as it was felt that this will provide an opportunity to manage the area's landscape quality, biodiversity and to promote recreational uses along with enhanced pedestrian and cycle access to the Town Centre. This could be delivered through a management plan for the area, with the agreement of the landowners and in collaboration with Wiltshire Wildlife Trust. The site selection process for Chippenham leading up to the Core Strategy identified that the area contains a heritage assets including scheduled Monuments and listed buildings.

The Wiltshire Historic Environment Assessment (January 2012) has stated that proposed development has a high risk of impact on the Rowden Scheduled Monument. Rowden and Chippenham Conservation Area and that no mitigation measures can alleviate the risks. However, the Council is of the opinion that the inclusion of greenspace rather than built development where the Rowden Conversation Area and Bristol

Road or the A350 South.

Traffic travelling northbound, reassigned from the A350 could use the new link road through the East Chippenham and North East Chippenham developments, creating additional west to east cross town traffic.

In the evening peak, conditions are predicted to be generally better, without any significant area experiencing impact apart from the town centre, where congestion predicted in the base case is exacerbated.

Improvements at junctions would form the most likely approach, and dualling would be less likely to be a consideration. However, the mitigation package for Option 2 delivers improvements spread more widely across the town than in the other options.

Concerns have been raised during the consultation that the location of Abbeyfield School in relation to the South West area of search means that any potential journeys for young people will be difficult and would significantly add to the traffic congestion. This is not an issue which participants raised during the additional consultation events, which included students from Abbeyfield School. Appropriate transport measures will be put in place to ensure that travelling to school from all the strategic sites is as safe as possible for students.

Parental rights mean it is not necessarily the case that all students will necessarily attend Abbeyfield School. In addition, it remains the case that further modelling work is required to ascertain whether there is a need for a new secondary school. Education Services have requested that a reserve site be put aside for a secondary school. There is a need for at least a IFE primary school in this area. Education have suggested that one combined school may be appropriate. This will be considered further as part of the ongoing Infrastructure Delivery Plan work and masterplanning for the site.

Saltersford Lane sites with Showell Farm/Patterdown/Rowden and the Methuen Park employment site and A4 to the north create barriers to connectivity with Cepen Park and the town centre. Therefore, it is now agreed that the site is separated from the remainder of the area of search by the railway line and therefore should be treated as a standalone site. The council has suggested that improvements could be made to the site layout through having a lower amount of housing and with the hill as focal point.

Although the Hunters Moon and Saltersford Lane sites would provide an opportunity to round off development to the set of Chippenham and help to meet the strategic housing requirement for Chippenham, it is unclear as to what further benefits they will have for the town and to meet the strategy set out in the Core Strategy and the vision objectives.

Therefore, it is considered that Hunters Moon and Land at Saltersford Lane should not be taken forward as part of the South West Area of Search

at present.

Consequently it is proposed that only the Patterdown, Rowden and Showell part of the Area of Search site remain as a strategic site providing 18ha employment land and 800 houses. The strategically important Showell Farm employment will be delivered which will contribute to the employment led strategy at Chippenham, will help to redress the issue of out-commuting at the town and ensure it becomes a vibrant business location. Delivery of houses on this site will contribute to meeting the strategic housing requirement for Chippenham. Together this will help to improve the self-containment of the town, helping to provide opportunities for a range of people but most importantly allowing young people to live and work in the town. The dispersed option now proposed for development including at Showell Farm, Rowden and Patterdown will allow for development further south east of Chippenham on Land South of Pewsham and Forest Farm to be beyond the plan period.

4.7.Redcliffe and Crest fully support the identification of South West Chippenham including Showell Farm and Patterdown and Rowden for a mixed use development comprising 18ha of employment and 800 dwellings. It is considered that the land under their control could accommodate additional housing should:

i)any of the other strategic allocations in Chippenham fail to deliver their requisite housing numbers and/or;

ii)the overall housing provision be increased as a result of the Core Strategy period being extended (see Core Strategy Policy 1 and 2) or as a result of an increase recommended by the inspector.

#### 5.SUITABILITY AND DELIVERABILITY OF SOUTH WEST CHIPPENHAM

5.1. NPPF states that to be deliverable, sites should offer a suitable location for development and be able to contribute to the creation of sustainable mixed communities. The Vision Statement demonstrates how the principals of sustainable development are embraced in South West Chippenham expansion.

5.2. The various issues which Local Planning Authorities should take into account in identifying specific sites for development are identified in NPPF. The detailed issues raised in that paragraph together are addressed in the following paragraphs, together with the Vision Statement. Landscape and Visual Amenity (Document 2 (CD))

5.3. Cooper Partnership have undertaken a Landscape and Visual Assessment of the land to the south of Chippenham. That assessment includes an assessment of the character and appearance of the Conservation Area. The work has been informed by a trawl of relevant background information as well as field survey work

#### The Landscape Strategy

5.4. The main elements of the Landscape strategy are:

Areas of development will be kept to the eastern side of the Avon Valley, outside the Conservation Area, and integrated with the extensive green infrastructure of the river valley;

Existing trees and hedgerows would be retained, and those on the eastern edge of the development strengthened with additional planting.

Substantial new woodland planting would be implemented using locally occurring native species;

Footpath and cycle routes would link the employment and residential areas

with the existing network of routes, providing links with the town centre and Pewsham estate. Routes would be clearly way marked, and bridges and boardwalks provided to take them over the river and brooks;

•Additional footpath routes have been proposed as part of the landscape strategy to link existing footpaths and tracks, so providing a substantial increase in the number of circular routes within the valley, and more effective links with adjacent residential areas;

•Strategic pedestrian nodes will be defined by interpretation boards are proposed to explain the historical, landscape and historical importance of the area, the local flora and fauna, and the environmental benefits of the proposed energy facility.

•Situated on the eastern edge of the development, the new school would have direct links to footpath and cycle routes within the valley, providing opportunities for active learning.

•Historic views from and the setting of Rowden manor would be maintained and enhance by the retention of the historically important surrounding fields, and by new tree planting west of Pewsham way which will provide visual enclosures of the existing carriageway and other development.  
5.5. A landscape management regime will be developed to avoid excessive demands on the local authority. This will take the form of a community partnership which will ensure input from schools, wildlife trusts, and local communities, all of whom will follow a green infrastructure management plan to be developed as part of the proposals.

#### Benefits of the Conservation Area

5.6. There will be no direct landscape impact on the Rowden Conservation Area, as the proposed development would lie well outside its boundary.

5.7. There will be no direct landscape effects on the listed building or scheduled monument at Rowden manor, or on the ancient woodland at Motimores Wood. The strategy protects the Conservation Area by:

The retention of trees, hedgerows and woodland belts along the eastern edge of the development will be strengthened with additional tree planting; New woodlands would be introduced where appropriate to the landscape character;

Historic views from Rowden Manor will be maintained, while views east and north-east towards Pewsham Way and the higher Pewsham estate will be enhanced by substantial new tree planting, west of Pewsham Way;

Historic ownerships mentioned in the Conservation Area assessment will be retained, and enhanced by interpretation boards and by appropriate public access to allow the public to explain this fascinating area;

Public rights of way through the Conservation Area, including historic routes, will be retained and enhanced by clear way marking and the position of bridges and boardwalks to take them over the river and brooks, and interpretation boards at strategic points; and

New cycle ways will provide access to the town and cross links along its southern boundary. Cycle routes will be added to link the proposed employment and residential areas to the town centre, the Pewsham estate and countryside to the south, creating circular routes within the valley, links with the proposed school and opportunities for active learning.

5.8. Materials and colours appropriate to the character of the conservation area will be used in the proposed development, which will appear as an extension of the existing settlement on the west side of the valley

#### Summary

5.9. Substantial components of the land to the south of Chippenham have 'high landscape capacity' making the area suitable to support a major town expansion without offending the principles of good planning.

5.10. NPPF states that the presence of best and most versatile agricultural land (defined as land in grades 1, 2 and 3a of the Agricultural Land Classification), should be taken into account alongside other sustainability considerations (for example biodiversity, landscape character and quality, heritage interest, accessibility to infrastructure, workforce and markets, maintaining viable communities, and the protection of natural resources), when determining planning applications. Where significant development of agricultural land is unavoidable, NPPF stipulates that local planning authorities should seek to use areas of poorer quality land (Grades 3b, 4 and 5) in preference to that of higher quality, except where this would be inconsistent with other sustainability considerations.

5.11. A review of the Department for Environment, Food and Rural Affairs (DEFRA)

'provisional' agricultural land classification (ALC) information for the area around Chippenham has been undertaken.

5.12. In broad terms, the majority of land surrounding Chippenham is classified as Grade 3 agricultural land on the provisional mapping, with the exception being Grade 4 land bordering the River Avon and adjacent to the Grade 4 areas Grade 1 and 2 land. These smaller areas of Grade 1, 2 and 4 land are located immediately to the north east and south of Chippenham, broadly corresponding with the location of the River Avon corridor and immediate surroundings.

#### Summary

5.13. Indications to date suggest that the expansion of the town southward would not result in the loss of best and most versatile agricultural land.

Biodiversity (Document 4 (CD))

5.14. An extended Phase 1 Habitat Survey of the site was initially undertaken by Nicholas Pearson Associates during March and April 2008. Further updated work has been undertaken by Environmental Gain. Additional surveys are ongoing of the River Avon and its tributaries as well as of other protected and notable species.

5.15. The survey was undertaken using the standard methodology as set out in the Joint Nature Conservation Committee Handbook, for the Phase 2 Habitat Survey, 'A Technique for Environmental Audit' (JNCC 1993).  
The River Avon and a block of woodland to the south east are designated as County Wildlife Sites (CWS). A further four CWSs occur adjacent to the Site and within up to 1km of its boundaries. No UK or European sites designated for nature conservation occur within the Site however a component of the Bath and Bradford-on-Avon Bats Special Area of Conservation (SAC) lies within 6.5km, to the southwest.  
Records for several protected species have been retrieved for land within the Site and within 1km of its boundaries, including records for badger (*Meles meles*), white-clawed crayfish (*Austroptamobius Pallipes*), otter (*Lutra lutra*), water vole (*Arvicola terrestris*), great crested newt (*Triturus cristatus*) and 11 of the UK's 16 native bat species, including lesser horseshoe (*Rhinolophus hipposideros*) and greater horseshoe (*Rhinolophus ferrumequinum*).  
Habitats likely to be of intrinsic nature conservation value within the Site include the River Avon CWS and associated habitats, such as streams and flood plains (including small areas of swamp or grazing marsh), and the network of hedgerows and mature and veteran trees. Other habitats recorded such as semi-natural woodland, mature trees and ponds are also likely to be of value, at least at the local level.  
Habitats within the Site also provide features which are potentially suitable for an array of protected and notable species identified in Document 5.

Summary

5.16. With the considerable biodiversity evidence base collected to date it is apparent that the land to the south of Chippenham has the capacity to accommodate a substantial scale of development with a relatively low potential adverse ecological impact. The Vision Statement not only respects the findings of the Biodiversity Appraisals undertaken to date but illustrates how enhancement can take place especially along the River Avon corridor.

Cultural Heritage (Document 5)

5.17. A preliminary archaeological assessment was undertaken by Nicholas Pearson Associates in August 2007.

5.18. Data has been collected from the following sources:  
Archaeological information held in the Wiltshire County Council Historic Environment Record (WHER).  
Information on archaeological sites and investigations, and historic buildings held by the National Monuments Record (NMR), Swindon. The NMR also holds copies of the published index of listed buildings.  
The index of the registry of air photographs in the NMR National Air Photo Library, Swindon has been checked.  
Early map sources, principally the first series Ordnance survey 6" map, have been viewed but are not considered here in detail.

5.19. The range of data collected and reviewed for the assessment defined all of the statutory constraints, all known archaeological monuments, sites and 'fmdspots' within the potential development area. It is sufficient to identify those zones of greatest heritage potential and significance.

5.20. The following statutory constraints to development have been identified:  
Rowden Conservation Area, the objectives of which include preservation of an historic landscape setting.

The scheduled monument centred on Rowden Manor.  
The individual listed buildings at Rowden Manor, Showell Farm and Patterdown Farm.  
Archaeological potential around Showell Farmstead and Cottages and Rowden Manor.  
Mortimers Wood including associated non scheduled Ancient Monument with the wood.

Summary

5.21. Further investigation of the area between Showell Farm and the Conservation Area might indicate some archaeological interest. The Vision Statement illustrates how development can be designed to avoid such areas of archaeological interest.

Flood Risk (Document 6)

5.22. Discussions have taken place with the Environment Agency and PBA have prepared a flood risk and surface water drainage strategy for the development of the site.

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5.23. The FRA concludes that whilst the South West area of search abuts the floodplain of the River Avon that it would be entirely possible to locate the proposed development area at a level above the "1 in 100 year plus climate change" flood level and outside of the areas shown to be at risk from flooding as indicated by Flood Zones 2 and 3 on the Environment Agency's Flood Map.

5.24. The distribution of development shown on the Vision Statement will not affect the conveyance of flood flows or flood plain storage capacity.

5.25. The proposed development would not increase the risk of flooding elsewhere from all rainfall events up to and including the 100 year climate change event.

5.26. The development could incorporate sustainable drainage systems in accordance with the guidance in NPPF and CIRIA C697.

5.27. Whilst satisfactory strategies for the disposal of surface water run off to the proposed development are achievable, we have yet to settle on the storm water mechanism preferred by the Environment Agency. As the site lies to the south of the weir in Central Chippenham there are two possible alternatives. The EA may favour direct discharge to the Avon on the basis that the development run off would reach the Avon in advance of any surge from further up stream. Alternatively they may wish to attenuate runoff to spread the burden placed on the Avon. Both options are achievable.

Summary

5.28. In view of the above, the proposed development can comply with the requirements of NPPF.

Land Contamination (Document 7)

5.29. SLR Consulting Limited have carried out an assessment of land quality issues including the potential for contamination by previous and existing land uses. This included a walkover exercise and desk study work which examined the potential for contamination by previous and existing land uses. The majority of land is currently farmland and as such land quality issues are unlikely to present any constraints to development. There is a small historic landfill site less than 1ha within the site boundary where white asbestos may have been deposited.

Summary

5.30. Whilst further investigation will need to be undertaken this issue does not represent a constraint to development proceeding.

Noise (Document 8)

5.31. PBA Consulting Limited have prepared advice in respect of the potential constraint to development relating to external sources of noise. Their preliminary semi quantitative assessment of noise constraints on development at South Chippenham has identified the Great Western Mainline railway to the west, the A350 Chippenham to Melksham Road and to a lesser extent Rowden Hill as potential noise sources.

5.32. Noise generation calculations based on road and rail traffic indicate that modest stand offs would be sufficient to reduce noise exposure to levels which would be consistent with development of housing without any specific noise mitigation measures.

Summary

5.33. It is therefore concluded that exposure to ambient noise levels is not a significant constraint to development within the site. The Vision Statement demonstrates how development can respect this issue.

Key Infrastructure and Services (Document 9)

5.34. NPPF states that local planning authorities should be aware of issues relating to:-

"Accessibility of proposed development to existing local community facilities, infrastructure and services including public transport."

5.35. PBA have been in discussions with Wessex Water with regards to how the site can be connected to the sewage treatment works. It is understood that the existing Chippenham Sewage Treatment Work has spare capacity and consequently the foul sewerage connection for the development can be discharged easily without the need for major sewerage infrastructure upgrade works that other sites require.

5.36. Turning to other infrastructures the respective gas, electricity and water companies have confirmed that supplies can be made available to the development by the usual method at developer funding extensions and reinforcements.

Summary

5.37. There are no infrastructure or service constraints to development proceeding.

Transportation (Document 10)

5.38. PBA has considered the strategic transport case for an employment and housing allocation in the South West.

5.39. The site lends itself extremely well to an early release of a significant area of employment land, due to its excellent strategic location adjacent to the A350, and potential to be connected to the town centre and station via direct bus links and pedestrian and cycle connections both on street

and through the riverside conservation area.

5.40. A comprehensive package of transport measures and new connections could be delivered in phases as development proceeds to further enhance the accessibility of the area, and mitigate any potential impact. The land needed to deliver these measures lies within the control of Crest/Redcliffe or the Council.

5.41. The site will result in the delivery of employment and 800 residential units in one cluster (South West), which inherently makes the development and associated infrastructure more viable compared with options that split the housing allocation. This also enhances the potential for people to live and work in the same area thereby reducing pressure of the transport network.

5.42. These measures are set out in Figure 7.1 and summarized attached:

#### Pedestrian and Cycle Links

5.43. A network of pedestrian and cycle links already exist to the town centre and to other areas of Chippenham from the South West area of search. They can be readily improved to complete a more comprehensive network linking the housing and employment land to the town centre and other local destinations. The majority of local destinations could be reached within a reasonable walking or cycling time. The potential measures outlined would:

- attract further usage of the existing walk and cycle routes

- improve access to the conservation area and river to the South of Chippenham for existing and new employees/residents

- provide improved riverside walks.

- deliver non-trafficked routes to the town centre

- connect routes to existing employment areas, facilities and schools

- improve connections to Lackham College

- be readily deliverable, as the land is under the control of Crest/Redcliffe or the Council

- reduce external car trips, as a result of internalisation of trips (people living and working within the development area, and using locally provided facilities) based on a 800 home allocation.

- lead to greater viability to sustain supporting facilities, such as schools, convenience stores, community facilities, leisure facilities, which can be reached by walking and therefore reducing car trips compared with option 2

- Minimise the number of new foot/cycleway required to connect the development sites to the key facilities/employment and therefore increase the viability for the delivery of high quality facilities.

- lead to greater usage of routes and therefore more natural surveillance to improve security.

#### Bus Services

5.44. New, diverted or extended bus services could be implemented to:

- include stops for the 234 and X34 services to Melksham, Trowbridge and

- Frome from the outset

- provide a high quality direct service to the town centre and railway station

- deliver an orbital service between connect the residential areas, employment areas, schools to the development

- improve bus accessibility from existing housing and recent development in the Rowden Hill area.

- improve bus connections across Chippenham as a whole

- make use of a 'bus only' link road through the development, and potential bus priority measures on Rowden Hill

- maximise the potential patronage on any new services by clustering the employment and housing in a single setting

- minimise the number of vehicles required to deliver high quality bus services compared with a more dispersed land allocation

- minimise the requirement for bus priority measures to ensure reliable services

5.45. All these factors will help improve the commercial viability of the services, therefore protecting sustainable travel options for the long term and reducing any potential future burden on local authority budgets.

#### Rail

5.46. Access between the South West area and the station could be improved by introducing new pedestrian and cycle links connecting to, and

completing the established network. The railway station is within a 'commuting' walk distance from the site, and comfortably within a reasonable cycling distance.

5.47. Existing bus services to the town centre could be used in the early stages of development to provide access to the station, and would be complemented and enhanced with new, frequent, direct services making use of bus priority measures as development proceeds.

#### Highways

5.48. Highway Improvements can be delivered to:

readily achieve access to employment land without the need to wait for the construction of major new link roads or bridges

provide relief to current traffic problems

build on previous investment to safeguard the A350 for widening.

draw back any rat-running traffic on the urban roads to return to the strategic

A350.

relieve some town centre and residential roads.

enhance the potential to deliver development and public realm improvements in the town centre

ensure that service vehicles/HGV's to the new development area will not pass through the town centre

provide for the opportunity to deliver a future link road to the south of

Chippenham.

#### Employment Issues (Document 11)

5.49. The Wiltshire Economic Needs Assessment confirmed that there is a strong demand and a serious shortage of supply of employment land at Chippenham and that Chippenham is in danger of being overlooked as a potential business location in the future. With regards Showell Farm they concluded that it represented the best strategic employment site in Chippenham.

5.50. The allocation of Showell Farm is also supported by Chippenham Vision, Chamber of Commerce and the North Wiltshire Economic Partnership. They recognize its potential in the short term as a preferred relocation for existing employers in the town. The promoters have been in discussions with a number of local companies regarding possible relocation of their businesses to Showell Farm. In addition the promoters are actively undertaking the proprietary work for the submission an early planning application to facilitate the delivery of the employment land as a first phase of development.

#### Geology and Mineral Resources (Document 12)

5.51. SLR Consulting Limited have undertaken an assessment of geological and mineral resource issues including the potential for sterilisation of viable mineral resources.

5.52. They have advised that the sand and gravel resources within the site are not capable of being worked as a viable mineral extraction operation and have made representations to the Wiltshire Minerals Core Strategy to that effect. This conclusion is consistent with the land not being recognised as being within a Mineral Resource Zone by the Minerals Authority. As part of the proposed development of Option 1, there is an opportunity to extract minerals prior to development for example as part of any flood prevention measure.

#### Air Quality (Document 13)

5.53. SLR Consulting Limited have provided a preliminary assessment of the potential constraint to development relating to air quality issues.

5.54. This preliminary assessment has concluded that it is highly unlikely that road traffic on the A4 Chippenham to Caine and the A350 Chippenham to Melksham roads would pose constraints on development even at the frontages of such roads based

on other latest monitoring results.

5.55. The Chippenham Waste Water Treatment Works lies within the site and an arbitrary 400m 'cordon sanitaire' has been identified around the Works by its operator (Wessex Water pic). However it is understood that this is not based on any modelling of actual odour omissions.

5.56. Based on experience elsewhere it is considered that this zone may be conservative and that it does not recognise the potential to locate a range of land uses close to the works e.g. employment or the co location of an energy centre to provide renewable energy to future development. Neither has the potential for improving the works and enclosing or covering some of the operations yet been explored.

#### Renewable Energy (Document 14)

5.57. PBA have provided an assessment of the options to provide renewable energy. In addition, the promoters have been in discussions with the

Malaby Group with regards their expressed interest in establishing a Biomass plant on the site (see correspondence). They are in the process of developing a Biogas Plant and Visitor Centre at Borehill Farm, Warminster. Accordingly, they have the necessary local experience and expertise at developing and operating such a facility on the site. This would greatly reduce the carbon footprint of the proposed development.

#### Summary

5.58. The South West Chippenham allocation complies with the advice in Paragraph 38 of NPPF. It is therefore available, achievable and deliverable within the timescales of the Core Strategy. As already stated the site has the potential to accommodate additional development within the boundaries of the allocation if required. In addition, the promoters control land to the east of the River Avon which if it were identified in the period post 2026 (or 2031) could provide the completion of a southern relief road.

#### 6. SOUTH WEST CHIPPENHAM

6.1. South West Chippenham comprises 18ha of employment land and 800 new dwellings. The following key issues can be made:

i) The site is available, achievable and deliverable in line with the guidance in NPPF;

ii) Substantial components of the land to the south of Chippenham and west of the River Avon have high landscape capacity making the area suitable to support a major urban expansion without offending the principle of good Planning; (see Landscape Statement)

iii) The development can take place on land outside of the functional floodplain if the River Avon and in line with the guidance in NPPF;

iv) Considerable ecological surveys have been undertaken on the site and are ongoing. A southern expansion can be accommodated with a relatively low adverse ecological impact; (see Ecological Statement)

v) Development can take place without infringing any area of archaeological interest;

vi) Development can take place within the Conservation Area which ensures that it preserves and enhances the character and appearance of the Conservation Area;

vii) There are no background noise levels which would be a constraint for development;

viii) All of the requisite utilities can be made available e.g. gas, electricity, water etc. to the development by the usual method of developer funding

levels which would be a constraint for development;

ix) The development could establish a Riverside Park which would manage the area landscape quality, biodiversity and to promote recreational uses along with enhanced pedestrian and cycle access to the Town Centre. No other option can deliver this proposal; (see Vision Statement)

x) The development would not sterilise any area which contains minerals of high quality. Minerals could be extracted as part of the development; xi) The expansion of the town south would not result in the loss of best and most versatile agricultural land;

xii) The development could deal with the existing traffic constraints and problems whilst providing a number of potential improvements e.g. to public transport, infrastructure and the redirection of through and local traffic from the town urban area; (see Transport Statement)

xiii) The development would release a prestige employment sites at an early stage which would assist the needs of firms looking to relocate in Chippenham; (see Vision Statement)

xiv) The development would provide a range and mix of house types including affordable housing to specifically meet local needs;

xv) A development which would contribute to reducing its carbon footprint by embracing the principles of renewable energy.

6.2. In conclusion, the identification of a south west expansion to Chippenham is

'sound' when assessed against all of the principles of good planning and in terms of a comparison of other alternative sites.

#### 7. RECOMMENDATIONS

7.1. The Pre Submission Document identifies South West Chippenham as a strategic allocation for development.

7.2. The promoters fully support Core Strategy Policy 10. A proper analysis of the evidence and the possible alternative options for growth reveals

	<p>that it represents the best and most sustainable option to accommodate part of the town's future development requirements.</p> <p>7.3. From the work undertaken by Crest and Redcliffe it is recommended that the allocation and vision be retained as an allocation within the Submission Core Strategy.</p>
<b>Reasons for oral participation</b>	The issues raised need to be the subject of debate at examination.
<b>Attachments</b>	<p>2167801_0_1.pdf , 2167803_0_1.pdf , 2167805_0_1.pdf , 2167806_0_1.pdf , 2167807_0_1.pdf , 2167808_0_1.pdf , 2167809_0_1.pdf , 2167810_0_1.pdf , 2167811_0_1.pdf , 2167812_0_1.pdf , 2167813_0_1.pdf , 2167817_0_1.pdf , 2167814_0_1.pdf , 2167936_0_1.pdf , 2167910_0_1.pdf , 2167911_0_1.pdf , 2167912_0_1.pdf , 2167913_0_1.pdf , 2167918_0_1.pdf , 2167923_0_1.pdf , 2167924_0_1.pdf , 2167925_0_1.pdf , 2167927_0_1.pdf , 2167931_0_1.pdf , 2167937_0_1.pdf , 2167938_0_1.pdf , 2167939_0_1.pdf , 2167941_0_1.pdf , 2167942_0_1.pdf , 2167943_0_1.pdf , 2167944_0_1.pdf , 2167945_0_1.pdf , 2167946_0_1.pdf , 2167947_0_1.pdf , 2167948_0_1.pdf , 2167949_0_1.pdf</p>

