

Wiltshire Council

Cabinet

29 June 2021

Agenda Item 6 – Wiltshire Local Plan Review Update

Question from Adrian Temple-Brown

To Councillor Nick Botterill Cabinet Member for Development Management, Strategic Planning and Climate Change

Statement

I attended the Strategic Planning Committee (SPC) Incinerator meeting yesterday to see how the local government works and to be honest, I'm still reeling. I have learnt a very, very difficult lesson:

No matter how expert you are, no matter how valid your opinion, no matter how well-founded your emotion, no matter how big your cause, or how large your numbers, you will not be listened to by the conservative majority of the committee unless you are advocating increased Economic Growth, which is Wiltshire Council's single, key, prime and only core policy.

The chairman of the committee went to great lengths to tell the committee members to give very little weight to anything and everything said by the informed public, received verbally, by written communication or through public consultation. He went on to explain that the committee members had no responsibility for any form of damage caused by their decision, because none were expert enough in any subject related to the decision set before them, didn't need to find out and it didn't matter anyway because national government would correct their decision if they got it wrong. Most risible was his statement that the decision should not fall along party lines. The ***Planning Officer*** then 'made the case' for the developer with a 20 minute presentation !!! Most depressing was the realisation that this group of conservatives control the raw power of money in our county.

Correction – their county.

I was ... disgusted.

To address your Leadership by Example in these times of climate and ecological crisis: I'm seriously considering cancelling my GSHP installation, dusting off my '57 3.4L Jag to drive regularly, skipping my windsurf kit & buying new, then driving daily to the coast to learn to carve gybe in my '67 Oxford; there's certainly going to be a great deal more wind in the coming years because your Local and National policy *accelerates* climate change – so, why not plan to enjoy it ?

As for this 24-hrs-to-respond agenda "consultation" and "next steps" ... ho ho ...

The leader of the council will whip his acolytes prior to the final meeting, the chair of the SPC will make the same greasy speech, the same impassioned public performance will be endured by the moneyed and the same result will be voted through:

Economic Growth, tick VG.

Next project, Sir Developer, if you please.

Question 1 - (21-166)

Why not cut the hypocrisy associated with claiming to actually *care* and just say it how it is:

We only care about money and we're going to make a shedload of it with "build, build build" ?

Just stating the truth would save those who care about all the other things a lot of time and effort.

And of course, it would save you council types a heap of cash.

Just Tell the Truth ... perhaps just the once in your upcoming term ?
Pretty Please ?

Response:

The planning application for the energy from waste facility at Northacre Industrial Estate was considered against the policies of the Development Plan and all other material considerations, in accordance with planning legislation. As explained in the report to the Strategic Planning Committee, the Development Plan policies are supportive of such development in this location, the Estate being designated as an area suitable for strategic scale waste treatment type uses. In terms of both the national and local 'Waste Hierarchy', an energy from waste facility qualifies as a 'recovery' operation and so fulfils the two roles identified in national planning policy for such facilities – namely to generate low carbon power and to treat waste so as to divert it from landfill.

It follows that the application was considered, and decided, in the context of both local and national land use planning policies which are supportive of such development. All other matters of detail - relating to, for example, traffic, ecology and amenity - were also taken into account, but none were of sufficient concern to justify a refusal of planning permission.

Wiltshire Council

Cabinet

29 June 2021

Agenda Item 6 – Wiltshire Local Plan Review Update

Question from Anne Henshaw – CPRE Wiltshire

To Councillor Nick Botterill Cabinet Member for Development Management, Strategic Planning and Climate Change

Statement

Given the recent very public loss of support for the housing and road proposals for Chippenham by the local MP and Town Council, does the Council now accept that its policies must be formed by better evidence which is responsive to what its residents wish, not on what speculative development financial return seeks?

Will the Council;

Question 1 – (21-167)

Make public the agreement with Homes England in order to gain effective participation by the Chippenham communities on a way forward.

Response:

Following questions about the publication of the GDA HIF Agreement advice was sought from Homes England. Their advice is that the GDA should not be published.

Agree that;

Question 2 – (21-168)

The Council must now deliver the commitment to understanding the consultation responses from the public, and that the lessons of avoidance of unacceptable proposals, not merely mitigation, be built into the Local Plan Review.

Response:

The Council is committed to a fair consultation process, which involves taking into consideration the views of all stakeholders including the local community.

Question 3 – (21-169)

The re-visiting of the housing numbers is based on proper evidence of present and future local housing need and mechanisms are explored to meet the essential future

local employment growth.

Response:

As set out in the Cabinet report, the proposal is to undertake further work in response to the consultation and the need to update parts of the evidence base including housing need and employment growth is recognised.

Question 4 – (21-170)

The brownfield figures for the county are properly scrutinised and more rigorously assessed for Homes and local Employment.

Response:

This point has been made in the consultation comments and will be given due consideration alongside other comments in preparing the draft Plan.

Question 5 – (21-171)

The review of the Transport Strategy is radical and closely integrated with the Local Plan Policies.

Response:

Transport assessments and evidence are an integral part of a Local Plan and the report recognises that further studies are needed to inform the development of the draft plan (paragraph 30).

Wiltshire Council

Cabinet

29 June 2021

Agenda Item 6 – Wiltshire Local Plan Review Update

Statement from Bill Jarvis

To Councillor Nick Botterill Cabinet Member for Development Management, Strategic Planning and Climate Change

Statement

Climate

Having just approved a development that will cause more CO2 emissions than all the development in the County and for the next 25 years, your proposed Local Plan development now needs to become significantly carbon negative and “15 minute” developments mandatory to reduce car journeys by some 150,000km per year simply to support the private business you have just licensed.

This appears to be a legal requirement as indicated in your report p27 reference to the Planning and Compulsory Purchase Act “*Development plan documents must (taken as a whole) include policies designed to secure that the development and use of land in the local planning authority's area contribute **to the mitigation of, and adaptation to, climate change***”.

Developer inclusion

In the short time available to review the update report, a significant issue is the weight you are putting on developer concerns as to where housing is best placed and developed.

The Local Plan is for the County and its people, not a charter for developers. Statements such as “...the development industry was generally either supportive of the higher number or considered it should be raised further to boost housing and deliver more affordable homes...” And “...developers, suggesting higher scales reflecting the role of the town...”, AND, on brownfield sites “...Developers considered that this source should not be relied upon...” AND “ ... Local communities were cautious about further growth, whereas those with a development interest sought an increase...” AND “...” General support ... developers for the proposed scale of growth...” are stating the obvious at its most polite.

The development industry (house builders) will inevitably see large house numbers and greenfield building as a good thing. Surely they are there to deliver what the people of Wiltshire want, not to be the driver behind development of the County.

Specifically, you refer to developer concerns regarding the costs of addressing the need to address zero carbon development. “...a significant lobby from the development

industry who stressed a rapid transition to net zero carbon development would be unduly costly. Developers questioned the Council's evidence on the true costs of building to zero carbon standards..."

The markets will drive pricing and a competitive market place will resolve costs. I repeat my earlier statement, the Local Plan is not a charter for developers.

Local Plan extension of validity

Also, having the Local Plan be extended to 15 years would mean no meaningful change in policy for that time. The existing period is bad enough and you only have to look back 15 years from today to see what a straightjacket that would be. A better solution would be to have 3 year interim reviews of local plan policy to give flexibility to responding to change in the same way any business does. This might mean more effort, but it would at least ensure that the Council were proactive and not reactive to change.

Extension to enable Public Comment

There is much more in this report that needs consideration by the many people who have already contributed.

Please enable the people you are there to serve the time to do so by having a further debate at your next cabinet meeting.

Response:

While we don't normally provide written responses to Statements, there are a few matters that require clarification.

Firstly, the report does not give weight to developer's comments or anyone else's. It is intended to provide an initial summary of the main issues that were raised through the consultation and highlight some of the key areas where the evidence base will need to be developed further; including an assessment of the potential to achieve net zero carbon development.

Secondly, there is no need to allow people to comment on the outputs of a consultation, as these are a matter of fact.

No decisions are being made at this meeting on policies for the draft Plan. As set out in the report (paragraph 5), once the draft Plan has been prepared it will be brought back to Cabinet and onto Council for approval before a further stage of public and stakeholder consultation is undertaken.

Wiltshire Council

Cabinet

29 June 2021

Agenda Item 6 – Wiltshire Local Plan Review Update

Question from Charlie Caffyn

To Councillor Nick Botterill Cabinet Member for Development Management, Strategic Planning and Climate Change

Question 1 (21-172)

In view of climate issues and the need for biodiversity, how can the amazing natural habitat that is the golf course (otters, badgers, bats etc) even be considered, this area needs and must be be conserved, once built on there is no turning back.

Response:

Similar concerns have been raised about this site through the consultation and will be given due consideration alongside other comments in preparing the draft Plan.

Question 2 (21-173)

Infrastructure in Braford on Avon is already stretched, and the access to the Golf Course site is untenable, all roads leading to the site are via residential areas, and with the on street parking are in affect single lane roads through built up residential areas populated with many children and young families.

Why has Wiltshire council continued during the consultation process to seek a Joint Venture (JV) partner offering county owned farm land to development partners? It is even prepared to offer land outside of Chippenham to seal the deal!

Response

See response to Question 1.

There is no Joint Venture in relation to Bradford on Avon.

Wiltshire Council

Cabinet

29 June 2021

Agenda Item 6 – Wiltshire Local Plan Review Update

Question from Charmian Spickernell

To Councillor Nick Botterill Cabinet Member for Development Management, Strategic Planning and Climate Change

Statement

The message from Consultation 18 and from the Parliamentary Committee's responses to the Planning White Paper is loud and clear. Does the Cabinet agree that:

Question 1 – (21-174)

The need now is to plan for the environment and climate change, health, education and transport infrastructure, jobs and the range of housing needed, prioritising brownfield re-development?

Response

These are all matters that need to be addressed in the preparation of any Local Plan in line with the National Planning Policy Framework.

Question 2 – (21-175)

The housing numbers need to be re-visited so they are calculated and allocated according to need rather than allowing for the wider opportunities pressed for by developers?

Response

As set out in the Cabinet report, the proposal is to undertake further work in response to the consultation and the need to update parts of the evidence base including that relating to housing need. The Local Plan needs to be based on robust evidence.

Question 3 – (21-176)

Experience has shown that building on the periphery and not re-developing in the town centre leads to serious economic decline?

Response

In developing the draft Plan, consideration will need to be given to the health of town centres and the potential for their regeneration as well as planning for the growth of places through greenfield expansion.

Question 4 – (21-177)

Wiltshire Council will give continued strong support to effective Neighbourhood Planning?

Response

The Council will continue to support communities to prepare their neighbourhood plans as we have done in the past.

Wiltshire Council

Cabinet

29 June 2021

Agenda Item 6 – Wiltshire Local Plan Review Update

Statement and Question from Chris Caswill

To Councillor Nick Botterill Cabinet Member for Development Management, Strategic Planning and Climate Change

Statement

The authors of the Appendix which forms the basis of the proposals to Cabinet admit that there has been a large response to the Council's Local Plan initial consultation, and that they have been able to produce only a preliminary account of the responses. Yet the intention is that the process moves forward on this very preliminary attempt at analysis which offers no proper account of the number, and content of critical or supportive responses. So that this paper is altogether premature and should have been deferred to a later meeting, where at least a more thorough evidence could have been available to the Cabinet and for the public to examine.

It is now also proposed that that more thorough account should not be brought back to cabinet, let alone the Council and only signed off behind closed doors by a Cabinet member. It will then be posted in public as the final account, which will then be evidence for the eventual Examination in Public, with no opportunity for the public to consider and comment on its accuracy and validity. This is democratically unacceptable.

The process is also problematic in the way the response summary gives equal presentational weight to the views of the profit-driven and national 'development industry' and the views of the citizens of Wiltshire in whose name this Plan is being prepared. It is an established fact that the development industry is a major financial contributor to the political party to which this Cabinet and Council majority belong, so this approach to response analysis sends an unfortunate message to the people of Wiltshire – your views are no more important than those of a national industry, many of whose main players are Conservative Party donors. I suggest this is an impression that this Cabinet should take urgent steps to correct, and not just with hot air.

I have seen a preliminary private analysis of Appendix 1, which lists at least 60 different examples of responses which were critical of the original Local Plan proposals, and suggesting changes. Yet the recommendations before Cabinet do not include the expectation that the next steps should take serious account of those objections, which is at best unfortunate and further undermines the Local Plan process. This at least should be corrected by the addition of a clear recommendation to this effect.

Response:

While we don't normally provide written responses to Statements, there are a few

matters that require clarification.

Firstly, the report is in response to a resolution of Cabinet on 1 December to receive a report on the main issues raised. It is intended to provide an initial summary of the main issues that were raised through the consultation and highlight some of the key areas where the evidence base will need to be developed further. This is not to the exclusion of all the other necessary steps that need to be taken to develop a sound plan based on evidence including as is made clear within the report proper consideration of all consultation responses.

Secondly, there is no need to bring another report back to Cabinet as the consultation report when completed will be a factual summary of the responses received. There is no need to allow people to comment on the outputs of a consultation, as this is a statement of fact.

No decisions are being made at this meeting on policies for the draft Plan. As set out in the report (paragraph 5), once the draft Plan has been prepared it will be brought back to Cabinet and onto Council for approval before a further stage of consultation is undertaken.

Question 1 – (21-178)

I submitted a detailed response to the Local Plan consultation which drew on national evidence and examples to make the point that the Local Plan proposals ignored, and should not ignore, the economic and social benefits that local farms bring to Wiltshire communities now, and the opportunities for these benefits to increase in the future with new environmentally friendly agricultural approaches. I also drew attention to the specific opportunities that public ownership of County Farms provide. In Appendix 1 I see there are only three brief and similar references to retaining farms for food production, one of which mentions County Farms, and one similarly brief which mentions Chippenham farms being retained for agriculture. This reductionist tick box approach has the effect of obliterating the argument and evidence about the social and economic benefits of local farms and their potential in the future. I am confident there are hundreds of other detailed arguments about the weakness of the Council's Local Plan proposals and consultation, similarly reduced in effect and attention by this bean counting approach.

What steps have you taken, or will you take, to ensure that the Council has the capacity and appetite for the competent review of consultation responses from the public and Town and Parish Councils that is needed to produce credible and useful evidence for decision making – evidence that is adequate for the Local Plan process and for giving confidence to the public that their views are being taken properly into account?

Response:

The initial summary of main issues, as you rightly point out, does refer to the issue that you raised through the consultation about the importance of retaining farms for food production. As a high-level summary, it provides the reader with an understanding of the issues that have been raised rather than the detail, which are in the representations themselves and will be published in due course. Officers have and will continue to use

the detailed comments received in taking the work forward. I can assure you that the views of all stakeholders are being taken into consideration.

Question 2 – (21-179)

As far as I can recall this is the first time that an account of responses to a planning consultation by this Council has given equal billing and apparent presentational weight to responses from the 'development industry', alongside an aggregation of responses from the public, and Town and Parish Councils. It is a clear statement that this Council does not believe in the primacy of its residents and its constituent Councils

(a) Why has this happened now?

Response

The report does not give weight to the comments from the development industry or those received from anyone else. It is intended to provide an initial overview of comments received. It is normal practice for local planning authorities to group responses received to consultations from different types of respondents.

(b) And (b) What right does a national industry whose primary aim must be profit have to comment substantively on issues such as local place shaping, the needs of Wiltshire rural communities, and local ambitions to address climate change?

Response

The development industry carries out business in the area and has a right to comment on consultations like other stakeholders. Paragraph 3.2 of the Council's adopted Statement of Community Involvement defines 'Our Community' as meaning "*residents, businesses, community and interest groups, town and parish councils, developers, adjoining local authorities...*".

Wiltshire Council

Cabinet

29 June 2021

Agenda Item 6 – Wiltshire Local Plan Review Update

Questions from Dr Helen Stride

To Councillor Nick Botterill Cabinet Member for Development Management, Strategic Planning and Climate Change

Questions are linked to supporting documents, appendix 1

Question 1 – (21-180)

The point has been raised that the impact on the environment of the plans for housing in Chippenham and other areas, will be too great. By what date will WC have conducted an assessment of the environmental impact of its local plan?

Response:

The plan will be prepared to meet the tests of soundness as set out in the National Planning Policy Framework and legislative requirements. It will need to be underpinned by evidence and support the delivery of sustainable development across Wiltshire. Both Sustainability Appraisal and Habitats Regulations Assessment are an integral part of the Local Plan process.

When the draft Plan is completed and published for consultation this will be accompanied by the necessary evidence to support it, including the environmental assessments referred to.

Question 2 – (21-181)

Why do housing plans unnecessarily exceed the standard method requirement?

Response:

The Government's National Planning Policy Framework requires that plans "as a *minimum*" seek to meet the area's objectively assessed needs. So, the Government's standard method is the minimum level that should be planned for. There may be local evidence that suggests a higher figure.

Question 3 – (21-182)

When will carbon accounting and measurable carbon targets be included in the plan to ensure that WC meets its own target of being carbon neutral by 2030?

Response:

In developing the plan regard will continue to be given to the Wiltshire Council climate emergency declaration. It is too early to say what policies will be included in the draft plan as these will need to be based on evidence.

Question 4 – (21-183)

By when will WC have conducted an evidence based, flood risk assessment of the impact of the proposed housing and feeder road in the Avon and Marden valley, on Chippenham and the surrounding villages?

Response:

A Strategic Flood Risk Assessment has already been prepared to inform the plan (see [Link](#)). We will continue to work with the Environment Agency to ensure that flood risk is appropriately addressed in preparing the draft Plan and where necessary more detailed assessments are undertaken.

Wiltshire Council

Cabinet

29 June 2021

Agenda Item 6 – Wiltshire Local Plan Review Update

Statement and Question from Gail Delahaye

To Councillor Nick Botterill Cabinet Member for Development Management, Strategic Planning and Climate Change

Statement and Questions

I am writing to express, amongst other things, my disappointment that the Local Plan Responses and next steps have been added to the cabinet meeting agenda at such short notice. Apart from the fact that many people may not revisit the agenda regularly it has left them with little if any time to respond by 12 noon today.

I have had very little time myself but these are things I have been able to identify. I am a Chippenham resident so some are town specific but many are equally applicable to other areas of the County.

- The surveys and statistics used in the formulation of the plan were pre Covid and pre Brexit and we all know that these events have had a large impact on both employment and industry generally. The end results of these changes are still not completely clear so new needs assessments need to be made.
- High street shopping is changing but town centres must remain as a destination to keep the heart of the town. This may well mean less shops but many still have attractions which should be improved and promoted e.g. Chippenham has the river side which could be improved visually at the very least.
- Development to the north east side of Chippenham will be out on its own, similar to Pewsham, so traffic/transport will still have to go to facilities such as shops, doctors, dentists, superstores etc adding to the load on the existing roads. The present infrastructure won't cope. Presently at peak times such as bank holidays and Christmas there are insufficient parking spaces.
- The proposals do not address climate change issues yet a carbon zero target has been set!
- The proposed housing numbers are disproportionate to both the need and the locations. We need to see the evidence of this need!
- The effect on green spaces and countryside is very detrimental to both nature and to the people who enjoy and benefit from it. It plays a big part in peoples mental health and well being as well as providing an alternative traffic free route for cyclists. Putting in a distributor road that slices across such a well used cycle path and other footpaths is unacceptable.

I could say much more but time is against me and so much has been previously said by many others.

I would ask the following -

Question 1 – (21-184)

Given the large of objections, with very good reasons, from public, councillors and our local MP, will the Cabinet accept that the HIF bid is no longer relevant and feasible to meet current and future needs?

Response:

A report on Future Chippenham is being brought to Cabinet on 13 July.

Question 2 – (21-185)

Will they now liaise and listen to local councils and communities as they are the people that live there and know the area so well?

Response:

In respect of the Local Plan, we are listening to the comments made on the recent consultation as expressed by local communities and other stakeholders. It is important that we take into consideration all comments made not only in relation to Chippenham but for the whole of Wiltshire as we move forward in preparing the draft Plan.

Once the draft Plan is completed, this will be considered by Cabinet and Council before it is published for consultation.

Wiltshire Council

Cabinet

29 June 2021

Agenda Item 6 – Wiltshire Local Plan Review Update

Statement from Ian James

**To Councillor Nick Botterill Cabinet Member for Development
Management, Strategic Planning and Climate Change**

Question 1 – (21-186)

Para 4

- a) The council failed to publish the 17 webinars to the public. Many residents were working at the time of the arranged sessions. Does the cabinet member consider 1300 attendees a good response from a population of 500,000 in Wiltshire?

Response:

Yes, the attendance was good. These were held at 7pm to avoid the normal working day. We did publish the presentations from the webinars after the events for people to see, as well as a write up of the questions asked at those sessions.

- b) Arrangements were made in the last week of the Consultation for people that did not have internet access to have a paper copy of the Local Plan. Please provide the names and addresses who received such copies to their Parish Clerk so that there is a record of just how many copies the Council sent out.

How many copies did the Council distribute to those with no internet access?

Response:

People could ask for hard copies of documents throughout the consultation, this was not limited to the last week.

All requests were dealt with at the time they were received but we do not have specific numbers of how many. We would not be able to provide details of who they went to due to data protection issues.

Question 2 – (21-187)

Para 10

- a) The complexity of the responses is entirely the Council's making. Many

members of the public could not understand the process, running two Consultations at the same time was confusing for many, and the documents were hard to find on the Council website. Many I am told just gave up.

Was the software used for the Webinars piloted if so are those comments and feedback available to the public to view?

- b) Why were many of the public excluded from the Webinars? Was it software issues or did the Council want to keep the numbers low purposely?

Response:

The Local Plan consultation was well publicised with weblinks provided and officers available to assist anyone who was having trouble accessing information.

The software used for the Webinars had been used successfully prior to the Local Plan events. Checks were made when we were alerted to the fact that a few people had trouble logging on and steps taken to improve instructions for people attending subsequent events.

The software was chosen purposely because it didn't limit attendee numbers.

Question 3 – (21-188)

Para 13

The algorithm to calculate the housing figure of 40,840 is the 2014 algorithm, the later 2018 one has reduced number of houses. Why has the council gone with a higher figure?

Response:

The 40,840 figure referred to in the consultation reflected the standard methodology calculation at April 2019. As the Government's standard methodology uses inputs that change periodically including an affordability factor, this can fluctuate.

Question 4 – (21-189)

Para 15

Will the Council determine affordable housing numbers of 40% or will the Council rollover and accept the cash from the developers for a lesser number?

Response:

In developing the Local Plan, a viability assessment will need to be undertaken to test options for affordable housing delivery. A level of affordable housing provision will be set in policies that is based on robust evidence to ensure that on-site delivery is maximised. The preference is to see on site affordable housing delivery.

Question 5 – (21-190)

Para 17

It is good to see the Council reviewing the local plan in light of COVID. Will the cabinet member review the housing numbers in Chippenham in the light of less people commuting using the railway station and the M4?

Response:

As set out in the Cabinet report, the proposal is to undertake further work in response to the consultation and the need to update parts of the evidence base including housing need and employment growth is recognised.

The point made about commuting is reflected in the consultation comments and is just one of the many points made that will be considered in looking at the spatial distribution of growth.

Wiltshire Council

Cabinet

29 June 2021

Agenda Item 6 – Wiltshire Local Plan Review Update

Statement and Question from Isabel McCord

To Councillor Nick Botterill Cabinet Member for Development Management, Strategic Planning and Climate Change

Statement

If I want to attend the Cabinet meeting I understand I have to do so in person. This means a car journey to Trowbridge from Chippenham and then an indeterminate time spent at County Hall waiting for my specific agenda item. This is not good use of my time when I could be economically active, and neither is it good for the environment. There will be other residents who do not wish to attend in person due to Covid concerns. How is it that you had the technical know how to consult online in the recent consultations on Future Chippenham and the Local Plan and yet do not give the public remote access to Cabinet and committee meeting. In the interests of public engagement with your residents remote access is required.

The Local Plan Update records at Appendix 1 significant objections to the scale of housing growth proposed for Chippenham. The report notes the evidence base for housing numbers and employment land needs reviewing in the light of the consultation submissions. If you look at the responses from Chippenham Town Council and Bremhill Parish Council you will see both councils were against the number of houses proposed for Chippenham and Bremhill Parish Council. In the light of these submissions and those of the general public opposing the numbers, and the need to review the numbers, surely this increases the risk that you will not deliver the number of houses in the right location in Chippenham and Bremhill Parish to meet the requirements of the HIF. As the HIF agreement with Homes England has not been published I, along with other Wiltshire Council residents, do not know how great this risk is and what impact taking such a risk would have on Wiltshire Council.

Question 1 – (21-191)

In the interests of transparency and public confidence please will you now publish the agreement as promised by your predecessor.

Response:

Following questions about the publication of the GDA HIF Agreement advice was sought from Homes England. Their advice is that the GDA should not be published.

Wiltshire Council

Cabinet

29 June 2021

Agenda Item 6 – Wiltshire Local Plan Review Update

Statement and Questions from Jane Durrant – Lacock Parish Council

**To Councillor Nick Botterill Cabinet Member for Development
Management, Strategic Planning and Climate Change**

Statement

We would like to raise our concern with regard to the fact that this meeting has been called at short notice with no notification. It is only today we have been made aware of this by a local resident and today is the deadline at midday for questions to be submitted.

This is completely unacceptable for an issue of such major significance to everyone impacted by this Local Plan and appears to undermine any due process. The Wiltshire Council local plan website has had no updates for some while on any progress or next steps.

Question 1 – (21-192)

On behalf of Lacock Parish Council we would like confirmation that the additional 5000 houses have now been removed from the local plan.

Response:

No decisions are being made at this meeting on policies for the draft Plan. As set out in the report (paragraph 5), once the draft Plan has been prepared it will be brought back to Cabinet and onto Council for approval before a further stage of consultation is undertaken.

It is therefore too early to say what the housing requirement should be. Further work needs to be undertaken in response to the consultation on key parts of the evidence base including testing the upper and lower levels of housing need and spatial distribution of growth for the plan period.

Wiltshire Council

Cabinet

29 June 2021

Agenda Item 6 – Wiltshire Local Plan review Update

Statement from Janet Giles

To Councillor Nick Botterill Cabinet Member for Development Management, Strategic Planning and Climate Change

Statement

Like the cabinet I have just ploughed through the 158 pages of the support pack for this meeting including the comments made in relation to the Local Plan Review for Wiltshire. Whilst I have previously read individual and area specific proposals, the impact of reading this report entire is shocking.

There is an overwhelming feeling that all of Wiltshire is being bombarded with developments they neither want nor need. We are a rural county with rural communities, market towns and villages and we do not want an urban sprawl imposed on us under the guise of “affordable housing” or any other Government algorithm.

Our countryside with rolling hills and canals is our biggest asset and we are planning to ruin it to comply with metropolitan edicts. People need houses where there is employment and there is no plan for expansion of that in our market towns so new housing sites will become dormitories and out of county journeys will further impact on climate change. More journeys, more roads, less carbon neutral.

COME ON WILTSHIRE JUST SAY NO TO SHEELA.

Wiltshire Council

Cabinet

29 June 2021

Agenda Item 6 – Wiltshire Local Plan Review Update

Statement and Questions from Jeremy Wire

**To Councillor Nick Botterill Cabinet Member for Development
Management, Strategic Planning and Climate Change**

Statement

I resent that my right to question this key decision by cabinet has been reduced to a few hours in the dead of night. There are lessons to be learnt here from the Chesham and Amersham by election where a strong Conservative majority was overturned because the electorate felt they were being taken for granted and overlooked specifically with respect to planning regulation.

I expected more from the new council after the lead party lost 10% of its seats in the latest local election. The electorate need to be able to have their say in a timely manner. You seem to have rushed this proposal to a decision to facilitate further landbanking by the development profiteers.

It is disproportionate to break down the responses into two strands without giving an indication of the numbers of responses from each side. This will give undue weight to the lesser responses.

Question 1 – (21-193)

Why is it deemed satisfactory to do it this way?

Response:

The report is intended to provide an initial summary of the main issues that were raised through the consultation and highlight some of the key areas where the evidence base will need to be developed further. It is normal practice to group comments into different types of stakeholders and to provide a summary of the points they make. The intention is not to give weight to any set of comments over another.

Question 2 – (21-194)

My second question relates to bullet point three of item 3 of the proposal to Cabinet: 'Wiltshire wide assessment of potential for renewable energy, zero carbon development and off grid energy networks at main settlements'. I would remind you that ALL development needs to be zero carbon if we are to address the greatest crisis facing humanity in its existence. Why is this being ignored?

Response:

This point about all development being zero carbon has been raised through the consultation and will be given consideration.

The Local Plan will need to be based on evidence and as such further assessments are needed to see whether this is possible at the present time.

Wiltshire Council

Cabinet

29 June 2021

Agenda Item 6 – Wiltshire Local Plan Review Update

Statement from Kim Power

**To Councillor Nick Botterill Cabinet Member for Development
Management, Strategic Planning and Climate Change**

Statement

Malmesbury is a small market town in the rural north of the County. How our historic town grows and develops is of considerable importance to the people who live here, so much so that we made the first Neighbourhood Plan in Wiltshire, which is successfully delivering housing and well exceeding targets.

However, over the last year or so, amendments to the NPPF and other planning changes have meant planning permission has been given for housing which is not in our Neighbourhood Plan and was objected to for other reasons. Unfortunately, there are more of such applications in the pipeline. This situation is of great concern to residents, especially given the Government's 'Planning For the Future' White Paper, which appears to further reduce local influence and decision making.

Question 1 – (21-195)

So, what does the Cabinet consider will be the effects of the Government's on-going planning reforms in respect of the Wiltshire Local Plan and also the weight and role given to Neighbourhood Planning?"

Response:

It is too early to say what the effects of the Government's future planning reforms will be in respect of the Local Plan and Neighbourhood Planning. This will need to be monitored as the plan progresses.

Wiltshire Council

Cabinet

29 June 2021

Agenda Item 6 – Wiltshire Local Plan Review Update

Statement from Kim Stuckey

To Councillor Nick Botterill Cabinet Member for Development Management, Strategic Planning and Climate Change

Statement

This update on the Wiltshire Local Plan has been produced before the full Consultation Report has been completed. It is not apparent what selection criteria was used by officers to select comments for inclusion in Appendix 1 or the weight of numbers that “support” or “object to” a particular comment.

It appears the full Consultation Report will not be approved by Council or Cabinet in a formal meeting, with the associated opportunity for the public to comment on it. For this reason the agenda item appears premature.

The report in Appendix 1 gives as much weight to Developer and Agent comments as to those of the Public and Town/Parish Councils lumped together. It appears from the report that Wiltshire Council is where every developer matters. Surely a Local Plan should be shaped by local people and groups plus their elected representatives. There should then be a parallel and separate process of identifying possible sites from promotion by landowners and developers, with their comments taken there.

Finally the Proposals for the Cabinet to agree on Page 2 of the Review seem to miss some major areas of further work that need to be addressed the review of the local plan, in particular:

- A review of the impact of COVID on working and transport requirements, particularly home working, provision of fast broadband, reduced car and public transport dependence and design of houses to support homeworking.
- A review of Principal settlement town centres for brownfield opportunities, especially the mix of retail vs housing in the light of changing retail patterns leading to unoccupied premises.

These should be added to the list of items in Part iii of the Proposals.

Response:

While we don't normally provide written responses to Statements, there are a few

matters that require clarification.

Firstly, the report is in response to a resolution of Cabinet on 1 December to receive an update report on the main issues raised.

The report does not give weight to developer's comments or anyone else's. It is intended to provide an initial summary of the main issues that were raised through the consultation and highlight some of the key areas where the evidence base will need to be developed further. This is not to the exclusion of all the other necessary steps that need to be taken to develop a sound plan based on evidence, including as is made clear within the report proper consideration of all consultation responses.

Secondly, the consultation report when completed will be a factual summary of the responses received. There is no need to allow people to comment on the outputs of a consultation through a committee process.

No decisions are being made at this meeting on policies for the draft Plan. As set out in the report (paragraph 5), once the draft Plan has been prepared it will be brought back to Cabinet and onto Council for approval before a further stage of consultation is undertaken.

Wiltshire Council

Cabinet

29 June 2021

Agenda Item 6 – Wiltshire Local Plan Review Update

Statement and Questions from Louise Weissel

**To Councillor Nick Botterill Cabinet Member for Development
Management, Strategic Planning and Climate Change**

Statement 1

On the Inclusiveness of the consultation itself: You state:

Executive Summary

“The consultation can be considered a success and encouraged a significant response. Overall, in excess of 3,500 representations were made from 2,682 people and organisations”.

Equalities Impact of the Proposal

41. The Council is subject to a public sector equality duty introduced by the Equality Act 2010. Consultation has been carried out in accordance with the Council’s adopted Statement of Community Involvement and associated Temporary Arrangements that are in place in the light of the COVID-19 situation. The consultation took an inclusive approach ensuring that everyone can be involved.

42. An Equality Impact Assessment will be carried out alongside the preparation of the draft Plan and will accompany the draft Plan when it is submitted to the Secretary of State for examination.

I continue to argue (as set out in my response to the Local Plan consultation) that this was NOT an equitable or inclusive consultation, not least because it was conducted during Lockdown. The amount of non-online information was minimal, and insufficient to inform the vast majority of older people who were both shielding and not online/IT literate. We have compiled written and verbal evidence for these claims, from angry members of the public who felt excluded by the process. Moreover, no extra time was allocated to give those people who found out later through local word of mouth about the consultation. We (local residents in Bradford-on-Avon), fund-raised & leafletted throughout the town to tell people to respond. The breakdown of the response numbers indicates very clearly that we were successful in our efforts (BonA had by far the greatest numbers of responses & respondents), whereas other towns were not so lucky as to have such vociferous and engaged activists, and because of Wiltshire Council’s mishandling of the consultation, very few responses were received from other market towns. See image below for the numbers as set out in your Appendix 1:

Amesbury (18 comments, 18 respondents)
Bradford on Avon (674 comments, 667 respondents)
Calne [no number listed]
Corsham (40 comments, 40 respondents)|
Devizes (118 comments, 111 respondents)
Malmesbury (61 comments, 61 respondents)
Marlborough (52 comments, 48 respondents)
Melksham (102 comments, 95 respondents)
Royal Wotton Bassett (59 comments, 57 respondents)
Tidworth and Ludgershall (14 comments, 14 respondents)
Warminster (25 comments, 24 respondents)
Westbury (39 comments, 33 respondents)

Question 1 – (21-196)

What will you do to ensure that those who have been excluded by the consultation can still have their voices heard?

Response:

All reasonable steps were taken to raise awareness and ensure that people had the opportunity to comment including those without access to the internet. The consultation was carried out in line with the Council's Statement of Community Involvement (Temporary Arrangements) in accordance with Government recommendations for working within COVID guidelines.

Your efforts to help raise awareness are commendable and appreciated. I do not agree though that there was a mishandling of the consultation. The consultation resulted in a good representation of views from within the Bradford-on-Avon community including the Town Council, which will all be given due consideration as the draft Plan is developed.

There will be a further opportunity for people to comment once the draft Plan is prepared and published for consultation.

Statement 2:

On the community response, including that of the Town Council:
You have not indicated in your report, the strength of feeling against the Local Plan Review, as captured in our own Town Council response. See screenshot below:

Town Council Public Statement

Response to the Consultation on the Draft Wiltshire Local Plan



At a full meeting of the Town Council 2 March 2021, to reject the Wiltshire Local Plan in its entirety for not only our town, but the whole county. It is not so much a plan, as an allocation of houses in unsuitable places. It lacks vision for the future of our communities and our county.

It lacks integration and due consideration with other key strategies such as Highways and Blue Green Spaces, and many other infrastructure issues. It does not recognise or take appropriate account of our Neighbourhood Plan. It is, at best, a 'business as usual' plan, intended simply to mark time to 2036; it does not address the Climate Emergency in any meaningful way and would not attain our shared target of Carbon Neutral by 2030, but would take us backwards.

We reject all three green sites proposed for housing, for the reasons laid out below. It clearly does not appreciate the true value of the land for our wellbeing, the environment and biodiversity and how much is lost irretrievably, by developing on these kinds of sites.

Question 2 – (21-197)

How will you address the true and heartfelt concerns of communities which, as Bradford on Avon has done, have outrightly rejected the Local Plan in its entirety? Also: what recognition has been made that we already have a democratically endorsed Neighbourhood Plan, which was made with inclusive community involvement?

Response:

The concerns of the Town Council are fully appreciated as are those of the wider community and will be taken into consideration alongside all other comments received as the plan is progressed. The neighbourhood plan was recognised in the consultation material and will continue to be taken into consideration.

Statement 3:

On Health, wellbeing, access & inclusion:

Environmental Sustainability, and Planning is integral to community health and wellbeing. Therefore, public health, access and inclusion should be at the heart of strategies and proposals. There is no mention in any of the key consultation documents of health and wellbeing, equality, access or inclusion. Housing type, tenure, location, local facilities, access to natural spaces and transport links will impact positively or adversely on residents' health and wellbeing.

It is not good enough, in my opinion, to simply state that Public Health is an unrelated department, upon which Planning has no impact. Planning MUST be made with the health and wellbeing of local residents as a core concern.

Question 3 – (21-198)

How will the Local Plan Review seek to address issues of public health (including health inequalities), access & inclusion? Why haven't the Local Plan key documents included the public health implications of its proposals?

Response:

The consultation was not on a draft Local Plan but designed to inform key parts. Health and wellbeing and accessibility are important issues that flow through Local Plans and are being addressed as the draft Plan is prepared.

Statement 4

Finally: I was told about this Cabinet meeting today – as I understand the documents were only recently (this week) uploaded. You have given members of the public less than 24 hours to submit questions by the deadline of Wed 23 June.

Question 4 – (21-199)

To those who ticked 'YES' on the form asking if we'd like to be kept updated, why were we not emailed about this meeting? This flies, again, in the face of your claims of inclusivity, since even those who are well-connected IT-wise are not kept in the loop. How on earth are people who are not online, to be made aware of when the meetings are and the deadlines for asking questions?

Response:

The report is in response to a resolution of Cabinet on 1 December to receive an update report on the main issues raised. It is a factual report and not taking any decisions on the draft Plan and its content. The tick box on the form is used to notify people about progress on key stages of the plan's preparation, for example, publication of the draft Plan for consultation

Wiltshire Council

Cabinet

29 June 2021

Agenda Item 6 – Wiltshire Local Plan Review Update

Statement and Questions from Margaret Green

**To Councillor Nick Botterill Cabinet Member for Development
Management, Strategic Planning and Climate Change**

Statement

I have a question for the cabinet about their plan for carbon sequestration to counterbalance their carbon emissions from road building, greenfield housing development and the planned incinerator.

The destruction of natural carbon sinks (green fields) and associated huge emissions from road/housing/incinerator building do not seem to add up.

It is worthy of note that Wales have halted all road building while they resolve similar challenges.

Question 1 – (21-200)

How can Wiltshire hope to reach zero emissions whilst increasing them at this scale and also destroying our natural carbon sinks?

Response:

The points you raise about zero emissions have been raised through the consultation and will be given due consideration as the Local Plan is progressed.

As set out in the report, the Council is mindful of its legal duty to prepare a Local Plan that contributes to the mitigation of, and adaptation to, climate change.

Wiltshire Council

Cabinet

29 June 2021

Agenda Item 6 – Wiltshire Local Plan Review Update

Statement from Martin Valatin

**To Councillor Nick Botterill Cabinet Member for Development
Management, Strategic Planning and Climate Change**

Statement

- Bradford on Avon Town Council's observation that this is 'not so much a plan as an allocation of houses in unsuitable places is to the point and by no means unfair.
- Developer comments about affordable homes and employment are to a large extent crocodile tears (the main industrial sites here have now all been turned into expensive developer housing).
- Planners have the unenviable task of implementing exponential house building targets set by central government while vainly hoping that this can be done in such a way that will not cause irreversible harm to our environment.
- This is essentially a political crisis, by the recent by election result at Chesham and Amersham, planning without any real plans (apart from housing numbers) may prove electorally unsustainable.

Wiltshire Council

Cabinet

29 June 2021

Agenda Item 6 – Wiltshire Local Plan Review Update

Statement from Maureen Lawrence

To Councillor Nick Botterill Cabinet Member for Development Management, Strategic Planning and Climate Change

Statement

I was surprised to see without warning a report going to Cabinet on Tuesday detailing the responses to the Local Plan and would firstly suggest that this be widely circulated to all parish councils for further comment.

I would like to point out that the webinars held between January and March this year were unable to be accessed by myself and many others so we could not contribute live to the debate. Many people would have been unaware of any consultation.

I live in a large village, Alderbury, near Salisbury which has had significant executive development in recent years resulting in loss of hundreds of trees, habitat, peace and quiet - rural areas attract residents looking for peace and quiet. Alderbury is already the bypass to the A36 bypass as it is routinely used as a rat road, causing significant noise and air pollution exacerbated by this loss of established trees.

I believe the local housing plan is based on the out of date algorithm of 2014 which stated thousands of houses were needed in South Wiltshire, many built on green belt, with no concern for the environment. Importantly the resultant housing is often poorly designed, bland and frequently out of keeping with the heritage of the area and other nearby properties. I am pleased to see that council will be reviewing the needs analysis as clearly Brexit with the exit of Eastern Europeans, plus control on future immigration, Covid, and numbers of deaths and people living with long Covid, will affect any economic data. In addition, the rise in home working plus the death of High Streets to internet use, must change the figures. I would hope that Wiltshire Council will look more sensitively and carefully at places designated for development, looking both at actual numbers required and then the designs of those houses which are passed for planning; properties should be allowed only where they are needed, based on all the economic, social and environmental evidence and especially not at the expense of the environment, to promote a more creative and sustainable vision for the future.

The need for smaller non-executive housing schemes (up to 12) with green areas including tree planting schemes and preferably used as council housing or housing for different needs eg disabled people is paramount in all villages; this will mitigate against further air and noise pollution and allow residents to stay in the area they know. The arbitrary 40% affordable housing figure which developers are supposed to meet doesn't

work as it is promised and then reduced by developers as they claim it is 'uneconomic'. Land banking for years should not be allowed after planning permission is given.

The other two major issues are transport and flooding - in our village there are numerous underground springs which should be taken into account when planning any further development and often are not. Sustainable drainage plans should be considered everywhere. Public transport which works at night and bank holidays, car sharing schemes, people friendly streets in cities and towns which limit the use of cars and lorries should all be considered.

Wiltshire Council

Cabinet

29 June 2021

Agenda Item 6 – Wiltshire Local Plan Review Update

Statement from Melissa Hillier

**To Councillor Nick Botterill Cabinet Member for Development
Management, Strategic Planning and Climate Change**

Statement

As a constituent of Nick Murry I would very much like to know the answers to the questions he has raised below and to understand more about future development plans for Chippenham. A balance clearly needs to be struck between actual demand for housing and the current plans which seem to create a vast extension of the town. Chippenham is already a dormitory/commuter town with most people driving out of town to work, increasing housing will simply increase current issues around congestion, lack of amenities etc.

Current plans seem to have little or no support from Chippenham Town Council or any residents, and as a resident I can confirm it has been hard to engage with this work as deadlines are short and finding out what is going on often happens by accident (eg stumbling across petitions online!). For something that will have huge impact on the town for the future, I feel more work is needed to bring about reasonable and sensible housing allocation, alongside discussion on amenities and local resources, rather than the current projection of 7,500 houses and a ring road - which is excessive.

Wiltshire Council

Cabinet

29 June 2021

Agenda Item 6 – Wiltshire Local Plan Review Update

Statement from Cllr Myla Watts – Deputy Leader Chippenham Town Council

**To Councillor Nick Botterill Cabinet Member for Development
Management, Strategic Planning and Climate Change**

Statement

With no advance notice, Wiltshire Council Cabinet has included a paper on the Local Plan Consultation Responses on its agenda. I believe this was only published online yesterday, giving the public around a day to read and digest the lengthy document and send in Statements and Questions for the meeting. I was only alerted to the agenda this morning (23 June) at 9.15am, and only have until noon to send a statement in. However, like many people, I work and do not have time during my working day to read all the information in time to make an informed statement. This is not democracy, this is the Cabinet deliberately trying to push things through without allowing proper public scrutiny. I think this is an appalling misuse of power, particularly given how much public interest there has been in the local plan, and it makes me understand why the general population has so little trust in our elected members.

Wiltshire Council

Cabinet

29 June 2021

Agenda Item 6 – Wiltshire Local Plan Review Update

Statement and Questions from Richard Ecclestone

**To Councillor Nick Botterill Cabinet Member for Development
Management, Strategic Planning and Climate Change**

Introduction

I am having to be necessarily brief on account of the very short notice provided by the Council to submit statements and questions. I would ask that more notice be given in future to allow citizens the opportunity to fully digest the material being discussed at Cabinet, so as to allow sufficient time to contribute.

Statement

In the Cabinet paper 'Wiltshire Local Plan Review Update' the sections relating to climate change fail to either grasp, or offer proposals to address, the magnitude of the task ahead, i.e. the need to radically reduce greenhouse gas emissions within the county in order to have any prospect of achieving either the legal reduction targets of 68% by 2030 and 78% by 2035 ([hWps://www.gov.uk/government/news/ukenshrines-new-target-in-law-to-slash-emissions-by-78-by-2035](https://www.gov.uk/government/news/ukenshrines-new-target-in-law-to-slash-emissions-by-78-by-2035)), or the local target of net zero by 2030. This is a fundamental flaw in the considerations about the Local Plan and is an omission that must be addressed urgently.

It will be absolutely necessary to measure the embodied and operational GHG emissions impact of the developments proposed in the plan, to identify whether they are compatible with the carbon reduction strategy the Council must pursue if it is to comply with the requirements of the legislation relating to climate change.

The Local Plan identified that climate change adaptation and mitigation strategies must be woven into a number of planning policy areas and act as a 'golden thread' through the plan. Despite the consultation responses highlighting the incompatibility of the proposals with emissions reduction requirements, this is still not evident in the Council's thinking. For example, paragraph 36 of the update, whilst encouragingly affirming the legal duty to ensure policies of the Local Plan address climate change, does not appear to focus on how the plan will contribute to the radical GHG emissions reductions that legal duty requires.

I submit that there is still insufficient understanding within the Council of the radical rethink needed if the climate change targets are to be met.

Question 1 – (21-201)

Will Cabinet commit to ensuring that the Local Plan policies will be compatible with the Carbon Reduction strategy, and ensure that the Local Plan contributes to the necessary GHG emissions reductions, rather than adding to them, thereby making the legal duty to address climate change unattainable?

Response:

Firstly, I would like to reassure you that the report to Cabinet is intended to provide an initial summary of the main issues that were raised through the consultation and highlight some of the key areas where the evidence base will be developed further. This is not to the exclusion of all the other necessary steps that need to be taken to develop a sound plan based on evidence. It is not therefore the complete response to the consultation, which will not be fully formed until the draft Local Plan has been prepared.

As set out in the report (paragraph 5), once the draft Plan has been prepared it will be brought back to Cabinet and onto Council for approval before a further stage of consultation is undertaken.

Wiltshire Council

Cabinet

29 June 2021

Agenda Item 6 – Wiltshire Local Plan Review Update

Questions from Ros Oswald

To Councillor Nick Botterill Cabinet Member for Development Management, Strategic Planning and Climate Change

Question 1 – (21-202)

On Monday the 21st I heard an excellent talk by Paul Robertson about the Community Environmental Toolkit which has been developed by the Council. It included a lot of information about all the steps volunteers can take to improve their environment and reduce the risks attached to Climate Change. What steps is the Council taking to ensure that each element of the Local Plan contributes positively to a significant reduction in carbon emissions in Wiltshire

Response:

Thank you for the positive feedback about the Council's Environmental Toolkit, which has been passed onto the officer concerned.

The point you raise about reduction in carbon emissions have been made through the consultation and will be given due consideration as the Local Plan is progressed.

As set out in the report, the Council is mindful of its legal duty to prepare a Local Plan that contributes to the mitigation of, and adaptation to, climate change.

Question 2 – (21-203)

Why doesn't the Council impose a condition that every new build in Wiltshire must be passive in terms of emissions

Response:

A requirement for all houses to be passive would need to be underpinned by national and local policy and evidence in respect of building fabric and energy performance standards. Work is being undertaken to inform draft policies for the Local Plan on building standards.

Wiltshire Council

Cabinet

29 June 2021

Agenda Item 6 – Wiltshire Local Plan Review Update

Questions from Rowena Quantrill – Climate Friendly Bradford on Avon

To Councillor Nick Botterill Cabinet Member for Development Management, Strategic Planning and Climate Change

Question 1 – (21-204)

First, and most importantly, will the council prioritise reduction of carbon emissions in all its decisions? The effects of climate change are already being felt all over the world and are likely to have a huge detrimental impact on the lives of our children and grandchildren. The council has declared a climate emergency and must act accordingly. Specifically we would like to see the council insisting that all new build housing is built to the highest environmental standards, preferably with solar panels. We would also like to see much more encouragement of onshore wind. As there are welcome plans to encourage electric car use and home heating to be by heat pumps, we will need more and more renewable energy generation and onshore wind turbines are the most economical way to produce this. We would also like to see better and more affordable public transport to reduce car use and thus alleviate congestion and air pollution.

Response:

The points you refer to have been raised through the consultation and will be given due consideration as the Local Plan is progressed.

As set out in the report, the Council is mindful of its legal duty to prepare a Local Plan that contributes to the mitigation of, and adaptation to, climate change.

Question 2 – (21-205)

In light of considerable objections from the local public, has the council re-considered its proposals of three sites for housing development in Bradford on Avon, particularly the old golf course and the allotments. The golf course is of considerable ecological value, particularly as a green corridor, the importance of which is being increasingly recognised and, at a time when the importance of local food and of the benefits to mental health of growing it are also being increasingly recognised, it seems completely perverse to consider building on allotments. We recognise the need for more affordable housing in the town but consider it is possible to provide this by small scale 'infill' developments on brownfield sites.

Response:

Similar concerns have been raised about these sites through the consultation and will be given due consideration alongside other comments in preparing the draft Plan. The Council is committed to a fair consultation process, which involves taking into consideration the views of all stakeholders including the local community.

No decisions are being made at this meeting on policies for the draft Plan or which sites should or should not be taken forward as further work needs to be undertaken.

As set out in the report (paragraph 5), once the draft Plan has been prepared it will be brought back to Cabinet and onto Council for approval before a further stage of consultation is undertaken.

Wiltshire Council

Cabinet

29 June 2021

Agenda Item 6 – Wiltshire Local Plan Review Update

Statement from Steve Perry

**To Councillor Nick Botterill Cabinet Member for Development
Management, Strategic Planning and Climate Change**

Statement

First, I wish to state that I fully support the statement made to Cabinet by Cllr. Matthew Short, Chippenham Hardens and Central ward. He makes the same points that I and many, many other residents of Chippenham have been making for literally years, and I won't waste your time by going over them again.

Second, there is a petition against the road containing more than 6,000 signatures. Please take notice!

Third, in the CEO's report contained in the documents, it appears to ignore the fact that Chippenham, Calne and Bradford on Avon Town Councils have all unanimously rejected the Local Plan as well as the road altogether! Also the two local MP's have also either not given or have withdrawn their support for the proposals. That must tell you something, as should the fact that Chippenham has totally rejected the Conservative Policies for the town in the recent elections. PLEASE LISTEN to the electorate, not the developers!

Wiltshire Council

Cabinet

29 June 2021

Agenda Item 6 – Wiltshire Local Plan Review Update

Statement and Questions from Steve Perry – Chair of CAUSE

To Councillor Nick Botterill Cabinet Member for Development Management, Strategic Planning and Climate Change

Statement

1. This document is premature. By its own admission, it is not based on a full analysis and it is not safe to use it as a basis for decision making. How can it proprot to be a summary ahead of the full analysis having been completed? The full version MUST come to Full Council or Cabinet in advance of any decisions being made, and must be presented in advance for public scrutiny. It is clearly not acceptable for Cabinet to agree that “the Cabinet Member for Development Management, Strategic Planning and Climate Change signs off the completed consultation report prior to its publication on the Council’s website” before the analysis has been completed and the report published! This Cabinet Member would be signing off on a critical report, on the future of our County, regardless of and potentially in contempt of Wiltshire residents views.
2. The Spatial Strategy for Wiltshire should be determined by the people of Wiltshire, and not by developers or their agents, whose sole interest is in profiting financially. This summary presents the views of developers alongside those of Town and Parish Councils, the public and their elected representatives, *as though they had some sort of equivalence*. The development industry should not determine - or have any major influence on - the Spatial Strategy and the number of houses and their locations within our County. Land-owners and developers are there to facilitate and support the delivery of the Local Pan in strict accordance with its policies (including those of Neighbourhood Plans). To legitimise the development industry views in this way is frankly shocking. For example, comments such as “There is too much emphasis upon brownfield land” which of course support the financial interest of developers, should carry no weight relative to the overwhelming support from towns, parishes and the public to prioritise brownfield sites. It begs the question as to whether Wiltshire Council is representing the interests of the development industry or its residents?

3. Cabinet should take account of the fact that in spite of the above, there is no support whatsoever for the HIF bid, distributor road and associated 7,500 houses. If anything, this should be one of the key conclusions, leading to a proposal that work now be done to dissolve the Agreement with Homes England (which is still being kept secret from the public), in line with the complete lack of any local support, this being a key eligibility criterion. Anything else would be indefensible, unethical and a clear example of Wiltshire Council supporting developer interests over its own residents' interests.
4. Cabinet should also take account of the fact that there is no local support for the Local Plan proposals for Chippenham, and refer to the response recorded in the Minutes below, which states that:
 - i. "The housing target allocated to Chippenham is much too high, bears no relation to Chippenham's actual housing needs and is predicated on substantial numbers of people relocating here, in order to commute back out, causing more congestion and significant damage to the climate;
 - ii. The proposals to develop large suburbs to the East (Site 1) and South (Site 2) would have a severe adverse impact on the town and cause unacceptable damage to the local environment through the destruction of high-quality farmland and wildlife habitat in the Avon and Marden Valley;
 - iii. The Chippenham housing numbers and their location should not be dictated by a grant application for a road, which did not undergo any public consultation, and which serves to predetermine the spatial strategy; and
 - iv. Wiltshire Council needs to develop an alternative Spatial Strategy, which is employment led, "appropriate in scale" and "environmentally sustainable" as stated in the Vision for the Chippenham Neighbourhood Plan."
<https://www.chippenham.gov.uk/wp-content/uploads/2021/03/PET-Minutes-180221.pdf>
<https://www.chippenham.gov.uk/wp-content/uploads/2021/06/Draft-Minutes-Extraordinary-Full-Council-250221.pdf>
<https://www.chippenham.gov.uk/chippenham-town-council-say-no-to-proposed-new-housing-in-wiltshire-councils-local-plan-review-consultation>

The Proposal (ii) on page 16 should acknowledge this and all the other Town and Parish Council objections, by stating that Cabinet "Agrees that progress continues to be made to develop the Wiltshire Local Plan Review in line with the democratic will and clearly expressed views of Wiltshire's residents."

Question 1 – (21-206)

Why has this report been brought forward in such a rush and in an incomplete form to this Cabinet meeting, rather than bringing it forward once the analysis has been completed and the findings shared with the public?

Response:

Firstly, the report is in response to a resolution of Cabinet on 1 December to receive an update report on the main issues raised. It is intended to provide an initial summary of the main issues raised through the consultation and highlight some of the key areas where the evidence base will need to be developed further. There is no weight or bias given to developers' representations, it is merely a record of what comments were made.

No decisions are being made at this meeting on policies for the draft Plan. As set out in the report (paragraph 5), once the draft Plan has been prepared it will be brought back to Cabinet and onto Council for approval before a further stage of consultation is undertaken.

Secondly, there is no need to bring another report back to Cabinet or Council as the consultation report when completed will be a factual summary of the responses received. There is no need to allow people to comment on the outputs of a consultation.

Question 2 – (21-207)

Does the Cabinet agree that the Spatial Strategy for Wiltshire should be determined by the residents of Wiltshire, and not by developers or their agents? Please include a YES or NO in your answer and explain your reasons.

Response:

The legislation governing local-plan making makes it clear that in developing a plan consideration needs to be given to the views of all stakeholders including the local community. This is recognised in the Council's adopted Statement of Community Involvement that defines 'Our Community' as meaning "*residents, businesses, community and interest groups, town and parish councils, developers, adjoining local authorities...*".

Wiltshire Council

Cabinet

29 June 2021

Agenda Item 6 – Wiltshire Local Plan Review Update

Statement from Sue Deedigan

**To Councillor Nick Botterill Cabinet Member for Development
Management, Strategic Planning and Climate Change**

Statement

As a climate concerned citizen of Wiltshire living in Calne Without I was very pleased to see the papers relating to the Local Plan Consultation Responses and that there were in excess of 3,500 representations from 2,682 people and organisations. At a time when it is often said that the public lack the motivation to engage in local politics as they feel that nothing changes and they do not have a voice and are not heard, it is refreshing to see so many have come forward. This I feel reflects the strength of feeling from local people and organisations on this matter.

I would like to thank the Wiltshire Council staff concerned who have sifted through all the responses on a variety of mediums to produce the initial summary and to lay out the next steps. That is no mean feat and I would like to congratulate each and every WC person involved.

As the papers have only just been released, this has not given me enough time to respond properly - indeed I am still digesting them as I type - but I assume this is because they were so many responses. But as I am aware that questions need to be submitted by 12 noon today to be included. I submit the following question as this is what is jumping out at me as I initially look through the papers:

How can developers and their agents who may or may not live in Wiltshire be allowed to influence plans for Chippenham? Their comments seem to reflect only their own vested interests and the profits they can make from a higher number of homes being built with no consideration of the climate emergency and the need for mitigation and adaption plans, the impact of Covid-19 and Brexit. Indeed I note that one of their concerns (point 35 Wiltshire Local Plan Review Update) was the costs involved in a rapid transition to net zero carbon development. This is an incredibly individualistic viewpoint and I am sure fills me and others with horror. The Climate Change Committee recently published their advice to government (<https://www.theccc.org.uk/publication/independent-assessment-of-uk-climate-risk/>) in which they stated that the UK is failing to keep pace with the impacts of a warning planet and on the webinar that I attended they highlighted

the costs involved in converting recently built homes to carbon zero and bemoaned the fact that developers are still pushing through with plans to build more.

Please can I request that Wiltshire Council put its Climate Strategy at the forefront of all planning and development decisions and show brave leadership at this important juncture of human history.

Wiltshire Council

Cabinet

29 June 2021

Agenda Item 6 – Wiltshire Local Plan Review Update

Statement from Susan McGill

**To Councillor Nick Botterill Cabinet Member for Development
Management, Strategic Planning and Climate Change**

Statement

I wish to object in the strongest possible terms to the inclusion in the agenda papers for the Cabinet meeting, 29 June 2021, of a summary of the Council's Local Plan Review Consultation held in March.

A full report of the consultation has not been published in advance of these Cabinet agenda papers. The summary included is not in any way an adequate basis for decision-making.

I am, like the rest of Wiltshire residents (and, presumably, Wiltshire Councillors), unable to check or confirm a single assertion among the many contained in the related documents.

Item 6 must be struck from the 29 June 2021 agenda. It must be reintroduced only when the full results of the Local Plan Review consultation have been in the public domain for sufficient time for Wiltshire residents to have read it.

I remind you of what is written on the Council's Consultation Portal—

“The Spatial Planning Service carries out research and develops the policies that plan for physical, social and economic development in Wiltshire. Mindful of the necessity to protect and enhance our built and natural environment, the spatial planning service works with local communities to deliver change while protecting our heritage for future generations.” (<https://bit.ly/3xBH3bc>)

The Cabinet document takes no account of the aim to “protect and enhance our built and natural environment”. It refers repeatedly to the “development industry” without specifying—

1. The identity of individual “developers” (undefined in the document) included in the collective term “industry”;
2. The number of “developers” included in that term;
3. Most seriously—which “developers” included in the term “industry” have headquarters based in Wiltshire; and the numbers of their permanently contracted employees who live in Wiltshire, thus participating in the lives of their local communities.

The document utterly fails to demonstrate that the Council’s spatial planning department is working “with local communities to deliver change while protecting our heritage for future generations.”

The documents refer to respondents and summarize selected replies to questions in the consultation. They do not support their classifications of those replies by reference to a methodology. They make no attempt to enumerate replies within those classifications.

For example, regarding Chippenham—

Quote<<

- There was a significant amount of objection from the local community to the scale of growth on a variety of grounds, the most common being: environmental harm, traffic congestion, lack of justification and undermining tackling the climate emergency.
- There were considerable objections to new road proposals. Some suggested that the existing road infrastructure is sufficient and some suggested road improvements (e.g. Bridge Centre roundabout and further improvements to the A350 could be made instead).
- Support for Chippenham as a focus for growth came from developers and landowners, although questions were raised about whether the homes could be delivered in the timescale. There were no objections from statutory environmental agencies, pending further details
- Land was promoted as further development for employment at M4 Junction 17. Residential redevelopment was proposed for parts of Langley Park and Emery Gate.
- Possible opportunities from development were seen as local economic benefits (greater self-containment), restoration of the Wilts and Berks Canal and an extensive riverside park.

>>Unquote.

(1) By their use of the passive voice, the authors of the documents not only hold back the underlying data from which they have drawn the above inferences but also the number and identity of those respondents.

(2) In describing “significant amount of objection from the local community” the authors do not say what they mean by *significant*. They confound this omission because *significant* is a statistical term with specific implications for prediction, analysis, and the drawing of conclusions.

(3) In support of their claim of absence of objection, the authors do not specify which, if any, “statutory environment agencies” actually responded to the consultation.

(4) In failing to identify the “developers and landowners” who supported the expansion of Chippenham, the authors evade the issue that these people and organisations stand to profit from such growth.

I can find no reference to a Consultation Management Strategy, nor to plans for disclosure of consultation materials. I can find no reference to an evidence handling strategy—for example, methods used to collate, classify, or cross-reference replies. I can find no reference to quality assurance mechanisms—for example, testing the validity and reliability of methods used; supervision of the people entering data; piloting data storage/retrieval methods.

I can find little account of detailed reasoning behind Council officers’ reviews of all the information submitted by respondents to the consultation, including that which officers evaluated as not relevant to their purposes. In fact, Council officers acknowledge that the updates provided are a preliminary step towards full analysis of responses to the consultation.

I can find no reference to how material relevant to the consultation will be retained—for example, in case future re-analysis is required.

I reiterate that Item 6 must be struck from the 29 June 2021 agenda. It must be reintroduced only when the full results of the Local Plan Review consultation have been in the public domain for sufficient time for Wiltshire residents to have read it.

Wiltshire Council

Cabinet

29 June 2021

Agenda Item 6 – Wiltshire Local Plan Review Update

Statement from Sylvia Wyatt

**To Councillor Nick Botterill Cabinet Member for Development
Management, Strategic Planning and Climate Change**

Statement

I am a resident of Great Bedwyn and responded at length to the consultation on the Wilts Local Plan in Jan- March 2021.

Very poor Process and engagement of residents of Wiltshire: I am astonished that I have not been sent the summary of review of the local Plan being now considered by the WCC. As someone who spent at nearly one day trying to understand the proposals (they were very technical, complicated and extensive) it is very surprising that I have not been sent this information. Instead, we are being given zero notice that comments on the local plan are being discussed . **Please can this item be postponed and a special meeting convened to consider it properly, given its huge importance.**

Comments on WCC summary of the local plan:

The summary of summaries does not mention the WCC's climate emergency resolution more does it relate the Wilts local plan to the developments being planned eg Westbury Incinerator (discussed at the planning committee yesterday)

The UK's Climate Change Committee has said the UK will fail to meet the Fifth and Sixth carbon budgets (our national carbon reduction targets) if it (including WCC) continue to pursue current policies, including national and local planning policies, which are currently targeting rural counties such as Wiltshire for climate damaging commuter extension housing. Wiltshire Council needs to play its part in protecting our future and must stop pursuing environmentally destructive and climate damaging policies that undermine national and local carbon reduction targets.

To achieve carbon footprint reduction, and stop climate change Wiltshire residents to significantly **change their behaviours**, the WCC needs to move quickly to support local organisations to help them work towards changing behaviours. This includes building zero carbon houses, encouraging Electric Car use, building up public transport to reduce commuter traffic and removing fossil fuel cars from roads.

Comments on specific points

Prior to the council election WCC (Cllr Clewer and others) stated that the additional 5,000 houses Wiltshire had voluntarily taken on, would be removed from Wiltshire's housing target and the Local Plan would be adapted in accordance with the significant consultation response which identified:

- That the local housing need (closer to 2,500 houses for the 2016-36 plan period according to ONS growth figures (**not** the 7500 houses proposed in the HI
- There are likely to be few new local employment opportunities (no new employment has resulted from the last phase of the plan)
- The housing targets completely ignore brownfield/ town centre regeneration opportunities.

Additional people living in Wiltshire, but commuting to work, bring **few benefits to local residents**, adds congestion, air pollution and strains on existing services, as well as destroying or degrading local amenities eg cycle path on railway lines, local river landscapes, open spaces and footpaths. And most serious of all, it contributes to damaging the lives of future generations by generating huge quantities of greenhouse gas emissions (from commuting) and destroying natural carbon sinks.

Actions for WCC to support reducing impact of Climate Change

1. The Government has pledged to meet net zero carbon by 2050, with a 78% reduction in emissions (on a 1990 baseline) by 2035. Wiltshire Council have declared a Climate Emergency and with the aim of reaching net zero by 2030 **so WCC needs to work to support this in every way possible.**
2. The Cabinet must confirm and operationalise that climate change must be an over-arching priority for this Council (and the Government and society) and **should test every decisions against the need to reduce carbon footprints .**
3. How can the Cabinet expect the public to engage in the way forward with these crucial issues without knowing what has been agreed? **The Local plan summaries and actions MUST be circulated and discussed in Parish Councils and Town Councils and WCC must listen to the responses.**
4. **Postpone discussion of the local plan by WCC and hold a special meeting about the Local Plan** with the normal amount of time and opportunity to comment and contribute to gain more support from local communities.
5. **Ensure that local residents in their communities (not developers) should have the major say in what happens in their own community** as they are trying to do by supporting the Neighbourhood Plans)?
6. Local business should need people who live in affordable housing which will help make small communities sustainable and enable people to work locally. **WCC should encourage local green businesses** to develop rather than destroying carbon sinks and creating huge car commuter extensions.
7. Ensure that steps are being taken to ensure that all housing, road and business developments in the next 5 years are **zero carbon or generate carbon savings and encourage biodiversity.**

Wiltshire Council

Cabinet

29 June 2021

Agenda Item 6 – Wiltshire Local Plan Review Update

Statement from Viv Talbot

**To Councillor Nick Botterill Cabinet Member for Development
Management, Strategic Planning and Climate Change**

Statement

The public has been given an astonishingly short period of time to make comments or questions regarding this crucial item on the Cabinet agenda. The summary of views does not reflect the depth of concern regarding proposals on new housing and road development and glosses over the urgency to prioritise reducing carbon emissions over a 'business as usual' scenario.

Wiltshire Council

Cabinet

29 June 2021

Agenda Item 6 – Wiltshire Local Plan Review Update

Questions from Karen Crawford

To Councillor Nick Botterill Cabinet Member for Development Management, Strategic Planning and Climate Change

Question 1 – (21-208)

Has the council removed the 5000 excess houses from its housing target and removed the over allocation from it's structural plan?

Response:

No decisions are being made at this meeting on policies for the draft Plan. As set out in the report (paragraph 5), once the draft Plan has been prepared it will be brought back to Cabinet and onto Council for approval before a further stage of consultation is undertaken.

It is therefore too early to say what the housing requirement should be. Further work needs to be undertaken in response to the consultation on key parts of the evidence base including testing the upper and lower levels of housing need and spatial distribution of growth for the plan period.

Question 2 – (21-209)

Will the council insist on cycle paths being integral to all new housing and planning decisions? I understand that the new housing in Rudloe, just outside Corsham does not have a cycle path into town

Response:

The current Local Plan (Wiltshire Core Strategy) has policies promoting cycling which are considered in appraising planning applications currently. Accessibility by different

modes of travel, including bikes, will be considered when developing new plan proposals and policies.

Wiltshire Council

Cabinet

29 June 2021

Agenda Item 6 – Wiltshire Local Plan Review Update

Statement and Questions from Cllr Ernie Clark

**To Councillor Nick Botterill Cabinet Member for Development
Management, Strategic Planning and Climate Change**

Statement

Hilperton Parish Council unanimously rejected Wiltshire Council's draft 2036 Local Plan proposal for the Hilperton area. The reasons were a) excessive housing numbers and b) the proposed site allocation to the east of the existing village.

The proposed allocation brings no benefit to local residents. On the contrary, it will add congestion, air pollution, strain on existing services, and destroy open space and footpaths.

I believe that, prior to the May 21 election, it was stated that the additional 5,000 houses Wiltshire had voluntarily allocated, would be removed from Wiltshire's housing target and the Local Plan would be adapted. Removal of these 5,000 'voluntary' houses from the target would totally remove any need for the 2,000+ houses in Hilperton parish.

Question 1 – (21-210)

Can Wiltshire Council now confirm that the 5,000 'voluntary' houses have been removed from the Local Plan?

Response:

No decisions are being made at this meeting on policies for the draft Plan. As set out in the report (paragraph 5), once the draft Plan has been prepared it will be brought back to Cabinet and onto Council for approval before a further stage of consultation is undertaken.

It is therefore too early to say what the housing requirement should be. Further work needs to be undertaken in response to the consultation on key parts of the evidence base including testing the upper and lower levels of housing need and spatial distribution of growth for the plan period.

Question 2 – (21-211)

Is the Cabinet aware of Hilperton Parish Council's objection to the proposed housing numbers and site allocation for the parish?

Response:

Yes.

Wiltshire Council

Cabinet

29 June 2021

Agenda Item 6 – Wiltshire Local Plan Review Update

Statement and Questions from Cllr Nick Murry

To Councillor Nick Botterill Cabinet Member for Development Management, Strategic Planning and Climate Change

Statement 1

Chippenham Town Council unanimously rejected the Local Plan's Spatial Strategy for Chippenham in terms of both its excessive housing numbers and its proposed site allocations to the East and South-East of Chippenham. It also rejected the HIF bid proposals for a feeder road and associated 7,500 houses several times, including unanimously confirming its opposition at its Annual Council meeting on 19th May 2021, as well as unanimously voting to write a letter of opposition to the HIF, to Wiltshire Council, Homes England and the Secretary of State for MHCLG, at its meeting on 17th June 2021.

Chippenham's MP Michelle Donelan stated in the press on 15th June 2021 that "I have not been given the assurances I sought regarding infrastructure and investment in the town" and "It is important that the interests of Chippenham's current residents are prioritised - yes we do need more affordable homes for families and young people to stay in the town but we certainly do not need 7500," concluding that "Now more than ever we all appreciate the beautiful countryside around our town and we must preserve it for future generations."

I do not intend to repeat all the evidence provided against the HIF during the consultation, which I assume will be available on Wiltshire Council's website, or to detail all the multiple Town Council resolutions rejecting the HIF and local plan proposals for Chippenham – I would simply ask Cabinet members to click and read the links below:

Town Council resolutions:

Full Council resolution with regard to Housing Infrastructure Funding and the Local Plan Review on 21st June 2021:

<https://www.chippenham.gov.uk/full-council-resolution-with-regard-to-housing-infrastructure-funding-and-the-local-plan-review>

Chippenham Town Council, Annual Council meeting on 19th May 2021:

<https://www.chippenham.gov.uk/wp-content/uploads/2021/06/Draft-Minutes-Full-Council-190521-1.pdf>

Extraordinary Council meeting on 4th March 2021:

<https://www.chippenham.gov.uk/wp-content/uploads/2021/03/Draft-Minutes-Extraordinary-Full-Council-040321.pdf>

<https://www.chippenham.gov.uk/chippenham-town-council-reject-all-options-presented-by-wiltshire-council-for-future-chippenham-consultation>

Extraordinary meeting of Full Council on 25th February 2021:

<https://www.chippenham.gov.uk/wp-content/uploads/2021/06/Draft-Minutes-Extraordinary-Full-Council-250221.pdf>

<https://www.chippenham.gov.uk/chippenham-town-council-say-no-to-proposed-new-housing-in-wiltshire-councils-local-plan-review-consultation>

Meeting of the Planning, Environment and Transport Committee, 18th February 2021

<https://www.chippenham.gov.uk/wp-content/uploads/2021/03/PET-Minutes-180221.pdf>

News articles:

Town Council letter to Wilts Council and Homes England (17th June):

<https://www.chippenham.gov.uk/wp-content/uploads/2021/06/Council-resolution-with-regard-to-Housing-Infrastructure-Funding-and-the-Local-Plan-Review-18.06.21.pdf>

<https://www.gazetteandherald.co.uk/news/19380121.chippenham-council-try-decline-75m-road-funding/>

Michelle Donelan to fight housing numbers in Chippenham (15th June):

<https://www.gazetteandherald.co.uk/news/19372607.michelle-donelan-fight-housing-numbers-chippenham/>

Chippenham MP says Wiltshire housing numbers must be reduced (3rd June):

<https://www.gazetteandherald.co.uk/news/19345839.chippenham-mp-says-wiltshire-housing-numbers-must-reduced/>

Town council votes to reject Future Chippenham scheme (8th March):

<https://www.gazetteandherald.co.uk/news/19143407.town-council-votes-reject-future-chippenham-scheme/>

Chippenham Town Council reject all options presented by Wiltshire Council for Future Chippenham consultation (4th March)

<https://www.chippenham.gov.uk/chippenham-town-council-reject-all-options-presented-by-wiltshire-council-for-future-chippenham-consultation>

Chippenham Town Council say no to proposed new housing in Wiltshire Council's Local Plan Review Consultation (26th Feb):

<https://www.chippenham.gov.uk/chippenham-town-council-say-no-to-proposed-new-housing-in-wiltshire-councils-local-plan-review-consultation>

Chippenham councillors unanimously voted to reject the local plan for the town (26th Feb):

<https://www.gazetteandherald.co.uk/news/19120550.chippenham-unanimously-votes-reject-wiltshire-local-plan/>

Calne Town Council objects to Future Chippenham scheme (25th Feb):

<https://www.gazetteandherald.co.uk/news/19118103.calne-town-council-objects-future-chippenham-scheme/>

Prior to the election Cllr Clewer and others stated that the additional 5,000 houses Wiltshire had voluntarily taken on, would be removed from Wiltshire's housing target and the Local Plan would be adapted in accordance with the significant consultation response. Taking 5,000 houses off the target means a significant reduction for Chippenham (even if some houses are withdrawn elsewhere) and would completely remove the need for the HIF bid, which is conditional on 7,500 houses.

The scale of the HIF bid proposed development (which was used to predetermine the Local Plan Review Spatial Strategy numbers and location for Chippenham) bears no relation to local housing need (which is closer to 2,500 houses for the 2016-36 plan period according to ONS growth figures) or to employment opportunities (no new employment has resulted from the last phase of the plan) and completely ignores brownfield/ town centre regeneration opportunities. It brings no benefits to local residents and adds congestion, air pollution and strains on existing services, as well as destroying or degrading local amenities such as the Old Railway line Cycle Path and local river

landscapes, open spaces and footpaths. And most serious of all, it contributes to damaging the lives of future generations by generating huge quantities of greenhouse gas emissions (from commuting) and destroying natural carbon sinks.

The Government has pledged to meet net zero carbon by 2050, with a 78% reduction in emissions (on a 1990 baseline) by 2035. Wiltshire Council and Chippenham Town council have both declared a Climate Emergency and with the aim of reaching net zero by 2030. The UK's Climate Change Committee has said the UK will fail to meet the Fifth and Sixth carbon budgets (our national carbon reduction targets) if it continues to pursue current policies, including national and local planning policies, which are currently targeting rural counties such as Wiltshire for climate damaging commuter extensions. Wiltshire Council needs to play its part in protecting our future and must stop pursuing environmentally destructive and climate damaging policies that undermine national and local carbon reduction targets.

Question 1 – (21-212)

Will Cllr Clewer now confirm that the 5,000 additional houses have been formally removed from Wiltshire's housing target?

Response:

No decisions are being made at this meeting on policies for the draft Plan. As set out in the report (paragraph 5), once the draft Plan has been prepared it will be brought back to Cabinet and onto Council for approval before a further stage of consultation is undertaken.

It is too early to say what the housing requirement should be. Further work needs to be undertaken in response to the consultation on key parts of the evidence base including testing the upper and lower levels of housing need and spatial distribution of growth for the plan period.

Question 2 – (21-213)

Is the Cabinet aware of Chippenham Town Council's outright objection to the HIF bid and proposed housing numbers and site allocations for Chippenham? (see links to resolutions in statement)

Response:

The recent resolution of the Town Council is a matter of public record.

Question 3 – (21-214)

Is the Cabinet aware of Chippenham MP's withdrawal of her support for the HIF bid and her objections stated in the Wiltshire press last week? (see links to press articles above)

Response:

Recent correspondence with Michelle Donelan MP is available on the Chippenham

Futures website [Wiltshire Council responds to a letter from Michelle Donelan MP regarding Future Chippenham - Wiltshire Council](#) It is understood that The MP's support of the Future Chippenham programme has not been withdrawn and is dependent on the council delivering specific outcomes for Chippenham and its residents.

Question 4 – (21-215)

Will Cllr Clewer now publish the agreement with Homes England, as originally promised by Cllr Whitehead. If not, why not?

Response:

Following questions about the publication of the GDA HIF Agreement advice was sought from Homes England. Their advice is that the GDA should not be published.

Question 5 – (21-216)

How can the Cabinet expect the public to engage on a way forward with these crucial issues without knowing what has been agreed?

Response:

The Council is committed to providing information on the Future Chippenham programme so people can make informed comments. However, the Council will not publish information that is commercially sensitive and would be prejudicial to its current interests

Question 6 – (21-217)

Will the Cabinet share with its electors and local MPs, a commitment to understanding the consultation responses (which were overwhelmingly opposed to the HIF bid proposals and Local Plan spatial strategy for Chippenham) and how the lessons will be built into the Local Plan Review?

Response:

All representations received on the Local Plan will be given due consideration as the preparation of the draft Plan is progressed.

Question 7 – (21-218)

Has the Future Chippenham team now been dissolved? If not why not?

Response:

No. The team will continue to progress the Future Chippenham programme in line with direction from Cabinet.

Question 8 – (21-219)

If not, how does Future Chippenham relate to the Council's plans to sign up to a Joint Venture Partnership?

Response:

A report on Future Chippenham is being taken to Wiltshire Council's Cabinet in July.

Question 9 – (21-220)

Who exactly will be part of this JV partnership and what is its purpose/ objectives?

Response:

This is not known at this stage and is subject to on-going independent advice and a procurement process in due course.

Question 10 – (21-221)

Will Cllr Clewer confirm or deny that the proposed Joint Venture Partners could be comprised of developers with financial interests in future development in or around Chippenham?

Response:

The parties to the Joint Venture (with the Council) will be selected by an appropriate procurement process, it is not possible to say at this point the identity of parties that may choose to express an interest.

Question 11 – (21-222)

How can developers, driven by vested interests and profit, be allowed to influence plans for the future of Chippenham (including the Local Plan)?

Response:

Developers have a right to comment on Local Plans like anyone else. This is recognised in the Council's adopted Statement of Community Involvement that defines 'Our Community' as meaning "*residents, businesses, community and interest groups, town and parish councils, developers, adjoining local authorities...*". However, this does not mean they have any undue influence over and above any other stakeholders.

If a joint venture partnership is developed to bring forward development it will be on land allocated via the Local plan review post that review. Any development proposals will be subject to the statutory planning process.

Question 12 – (21-223)

Shouldn't Chippenham's residents (not developers) have the major say in what happens in their town (as they are trying to do by supporting the Neighbourhood Plan)?

Response:

See response to Question 11.

Question 13 – (21-224)

What steps are being taken to avoid corrupt practice in the JVP arrangement, given the obvious opportunities for insider trading and private deals between the JVP and the Council?

Response:

The parties to the Joint Venture (with the Council) will be selected by an appropriate procurement process

Question 14 – (21-225)

Does the Cabinet agree that climate change must be an over-arching priority for this Council (and the Government and society) and if so, that destroying carbon sinks and creating huge commuter extensions is not a viable proposition?

Response:

The points you raise have been made through the consultation alongside many others and will be given due consideration as the Local Plan is progressed.

As set out in the report, the Council is mindful of its legal duty to prepare a Local Plan that contributes to the mitigation of, and adaptation to, climate change.

Question 15 – (21-226)

Will the Cabinet acknowledge that the HIF bid is dead and start engaging with local councils and their local communities on a new way forward, that's fit for the future?

Response:

A report on Future Chippenham is being taken to Wiltshire Council's Cabinet in July.

Statement 2:

1. It was not known in advance that the Local Plan Review would be on this agenda and is completely unfair to put such an important item on the agenda mere hours before the deadline for public questions that will receive an answer expires (noon today).
2. The report is not only incomplete but the methodology is highly suspect in presenting the views of (a few) developers alongside those of Town and Parish Councils, the public and their elected representatives (all lumped together), as though they were somehow equivalent. The Spatial Strategy for Wiltshire should be determined by the people of Wiltshire not by developers, whose sole interest is financial gain. The development industry should not determine or have any major influence on the Spatial Strategy and the number of houses and their locations within our County. Comments from developers such as “Support for Chippenham as focus for growth,” and “Developers of land within preferred sites generally supportive,” and “There is too much emphasis upon brownfield land” which support their vested financial interests, should carry no weight in determining the Spatial Strategy, and relative to the overwhelming opposing views to these comments from towns, parishes and the public to prioritise brownfield sites. How are comments given by a single developer in relation to promoting their site comparable to unanimously supported Chippenham Town Council (representing c. 45k residents) representations in the opposite direction? Where is the appropriate weighting being applied? Is Wiltshire Council representing the interests of the development industry or its residents?
3. Cabinet needs to take account of the fact that, in spite of developer opinions, there is no local support for the HIF bid, distributor road and associated 7,500 houses. This should be one of the key conclusions of this summary report, which should have led to a proposal the Agreement with Homes England be urgently reviewed with a view to dissolving. It is important to point out that a key criterion for the HIF bid was local support, and that there is a complete lack of any local support (from residents, Town Council or Chippenham’s MP). Anything other than a withdrawal from this agreement would be supporting developer vested interests over Wiltshire’s residents’, and given the associated climate damage, Chippenham’s and the County’s future residents’, interests.
4. Cabinet also needs to take account of the fact that there is no local support for the Local Plan proposals for Chippenham, and refer to Chippenham Town Council’s consultation response, which states that:
 - i. “The housing target allocated to Chippenham is much too high, bears no relation to Chippenham’s actual housing needs and is predicated on substantial numbers of people relocating here, in order to commute back out, causing more congestion and significant damage to the climate;
 - ii. The proposals to develop large suburbs to the East (Site 1) and South (Site 2) would have a severe adverse impact on the town and cause unacceptable damage to the local environment through the destruction of high-quality farmland and wildlife habitat in the Avon and Marden Valley;
 - iii. The Chippenham housing numbers and their location should not be dictated by a grant application for a road, which did not undergo any public consultation, and which serves to predetermine the spatial strategy; and

iv. Wiltshire Council needs to develop an alternative Spatial Strategy, which is employment led, “appropriate in scale” and “environmentally sustainable” as stated in the Vision for the Chippenham Neighbourhood Plan.”

This was reconfirmed by the new Council (post May 2021 elections) via a resolution objecting to the HIF and associated housing proposals and by a letter sent to the Chief Executive of Wiltshire Council on 18th June 2021, stating that:

“Chippenham Town Council wholly opposes the construction of such a road and the use of HIF funding for highway infrastructure, to the east and south of Chippenham; disagrees with the proposals for 7,500 houses in the Avon and Marden Valley area defined by the proposed road routes that would be part funded by the HIF; and requests that the £75m funding for this road is withdrawn on the basis that there is overwhelming opposition from residents and local town/parish councils, including Chippenham and Calne, for this carbon intensive and environmentally damaging scheme.”

The proposal (ii) under item 6 needs to acknowledge this and other Town and Parish Council objections to the Spatial Strategy by adding that further development of the Local Plan *will take account of the democratic will and clearly expressed views of Wiltshire’s residents.* Perhaps one of the Cabinet members could propose this amendment.

Question 16 – (21-227)

Does the Cabinet agree that the Spatial Strategy for Wiltshire should be determined in the best interests of the residents of Wiltshire, including taking account of the need to minimise carbon emissions, and not by developers?

Response:

See response to Q11.

In developing any plan, the interests of the local community are key considerations.

Question 17 – (21-228)

For what reason has this incomplete report been brought to this Cabinet meeting, rather than completing its analysis and sharing with the public in advance?

Response:

The report is in response to a resolution of Cabinet on 1 December to receive a report on the main issues raised. Paragraphs 9 and 10 explain why only an initial summary has been provided. There is a need to press ahead with the preparation of the Local Plan and it was not felt necessary to delay the reporting to Cabinet.

The consultation report when completed will be a factual summary of the responses received. There is no need to allow people to comment on the outputs of a consultation through a committee process.

No decisions are being made at this meeting on policies for the draft Plan. As set out in the report (paragraph 5), once the draft Plan has been prepared it will be brought back to Cabinet and onto Council for approval before a further stage of consultation is undertaken.

Wiltshire Council

Cabinet

29 June 2021

Agenda Item 5 – Future Chippenham / HIF

Statement and Questions from Cllr Clare Cape

To Councillor Nick Botterill, Cabinet Member for Development Management, Strategic Planning and Climate Change

Statement

Chippenham Town Council emphatically and overwhelmingly rejected the Future Chippenham (HIF) distributor road; and the proposals in the Local Plan for a suburb of 7,500 homes to the south and east of Chippenham in February and March this year. In May, members of the new Chippenham Town Council voted unanimously to re-affirm the previous Council's position.

The recent Chesham and Amersham by-election, historically a safe Conservative seat, was won by the Liberal Democrats, at least in part due to this government's inappropriate desire for excessive development of the countryside. This was as clear on the Buckinghamshire doorsteps as it was reported in the media; and closely mirrors what we've heard in locally. Concreting over the countryside; continuously do-nutting our market towns and destroying our natural capital and farmland to accommodate commuters is not what local people want. Even Chippenham's MP now seems to be of the opinion that 7,500 houses is excessive; and that Chippenham's residents must be listened to.

Just yesterday (Tuesday 22 June) the media were reporting that the Welsh government are stopping road building because of the need to mitigate the climate crisis.

Question 1 (21-229)

Is my understanding correct that the Leader and Cabinet have agreed to remove the excess 5,000 houses from the Local Plan which would then reduce the number required for Chippenham and hence the justification for the HIF bid for a distributor road to serve those houses?

Response:

No decisions are being made at this meeting on policies for the draft Plan. As set out in the report (paragraph 5), once the draft Plan has been prepared it will be brought back to Cabinet and onto Council for approval before a further stage of consultation is undertaken.

It is too early to say what the housing requirement should be. Further work needs to be undertaken in response to the consultation on key parts of the evidence base including

testing the upper and lower levels of housing need and spatial distribution of growth for the plan period.

A report on Future Chippenham is being brought to Cabinet in July.

Question 2 (21-230)

Would the Leader, Cabinet member and officers kindly provide to an update to Cabinet regarding their intentions regarding the following?

- a) To re-work the Local Plan proposals for Wiltshire **as a whole**, based on a **revised and evidenced number** of homes - particularly **affordable homes**; and with **alternative options included** for example prioritised use of brownfield sites; a garden village; a different spread of development; and smaller developments.
- b) To undertake traffic flow studies to inform options for a **very significantly less damaging solution to traffic problems** in Chippenham.

Further, in addressing a) and b), to undertake:

- c) To take into account the **climate and ecological emergencies**
- d) To reflect **post-pandemic changes** to the way our residents live, work, do business, travel and spend their leisure time
- e) To take on board the **strength of feeling amongst local residents** who are against the HIF and associated huge development; and also those who recognise the need for housing of appropriate type, in appropriate locations; and who want to find a way to solve traffic problems in Chippenham.
- f) To **fully involve local elected members** of all political persuasions, from both Chippenham itself and the neighbouring affected Parishes in finding a way forward.

Response:

The points raised about Local Plan proposals have been made through the consultation, alongside many others, and will be given due consideration as the Local Plan is progressed.

See response to Question 1 also.