

## **Statement to Wiltshire Council on the Chippenham DPD**

**From Ian James**

**14<sup>th</sup> July 2015**

### **Background**

Bremhill parish is a settlement to the east of Chippenham, of 394 houses and 970 residents. It is a large rural parish that once boasted 40 dairy farms. There are now just 3 supplying milk to Cadburys and Waitrose. With over 600 milkers and 400 others on the farms they take some feeding. Much of the local economy is agricultural based supporting the three dairy herds and other smaller farms.

The Council proposes to concrete over 300 acres of green belt farmland to build up to 2,600 houses in partnership with Chippenham 2020 (although only 850 are proposed in the C1 development, C2 will follow)

Farmers have to buy and rent land outside the parish to feed their cattle, Can this be right?

Tourism is also key to the local economy, walkers, and cyclists holiday happily in the parish visiting the local sights including Maud Heath's Causeway the oldest footpath in the world. The landscape of the Avon and Marden valley is unique.

The River Marden is one of the best coarse fishing rivers in the south of England.

The Council states its proposal to you today is sound. The consultation period has proved that parts of the Chippenham DPD are factually wrong, inaccurate, and misleading. I would ask that you reject the proposal from

the Chair, and propose the Council looks to other areas available that will have less impact, and provide better value for money to the taxpayer.

This is a statement on behalf of Bremhill Parish Council. The parish council is in the process of completing a Neighbourhood Plan, and a survey undertaken in the parish to evaluate many aspects of life found that 88% of those interviewed wanted to maintain green space between the villages and the towns of Calne and Chippenham. Of the 394 properties in the parish 187 responded to the questionnaire, giving a return of 47%.

The parish council therefore has a mandate under the Localism Act to protect this green space for the wildlife and recreation for those living in Chippenham, Calne and importantly visitors to our county.

The proposed Chippenham DPD for land to the east of Chippenham has been put forward with three aims to provide a country park alongside the River Avon, to provide 850 homes, and to provide a river crossing over the river Avon.

On the first point, the land to the east of Chippenham of which 50% is part of Bremhill parish already has public footpaths across the River Marden and Avon valleys. It has a dedicated cycle route, the North Wiltshire Rivers cycle route, which provides visitors and local people with an opportunity to come into the countryside. The route is suitable for mobility scooters, giving disabled and the elderly a safe passage to enjoy fresh air and views towards Cherill, Maud Heath's monument at the top of Wick Hill, and

views to Lyneham Banks. There is no need to create a Park, as it already exists. That experience will be lost to the public. Where else in the county can disabled, and young venture safely on a cycle route into the countryside. If the Council has its way those visitors will pass through 40 acres of employment land, and have to cross a major link road carrying HGV's, and other vehicles, air and light pollution will suffer.

The leader of the Council quite rightly suggested that rather than be negative regarding the Chippenham DPD, alternative sites should be suggested. Other sites have been suggested, but the council has incorrectly assessed those other sites, and shown site C as the favoured site. It appears to have ignored site D almost in its entirety. BUT it is close to Abbeyfield school, it is adjacent to Pewsham way, and has little impact on the countryside.

At the Cabinet meeting on 9<sup>th</sup> July it was pointed out that the traffic survey had double counted traffic in favour of site C. This makes this evidence UNSOUND. You are asked to judge the facts on the evidence supplied today, not in 2 months time as has been suggested by cabinet. In any judicial presentation if one side fails to present the correct evidence the case is dismissed. I suggest you consider the same.

There is no denying that housing needs to be built, but to build on two farms and lose a total of 300 acres of farmland alongside the river Marden and Avon is a high risk strategy. Flooding of Chippenham Town and those farms upstream is a serious risk, when there are other sites, which score more

favourably. Why has the council selected the highest flood risk site? You may well want ask the cabinet?

The land is clay and does not drain, the water table is high most of the year, and the site is adjacent to a flood plain. The Council is intent on developing here, but it will require two bridges to be built, one over the Great Western railway line just east of Chippenham, and the second over the river Avon, at the confluence of the river Marden. These would connect with a north eastern link road. The bridge would be 49 metres above sea level, and span 500 metres of flood plain.

Where is the money coming from to build this infrastructure?

This site is adjacent to a SSSI. This will be a huge concrete blot on the landscape, and will destroy this landscape forever.

Why do we want a NE link road? Chippenham does not need a NE link road. A southern link road will link the newly dualled A350 with the A4 across one bridge, and on a shorter route. This road will connect the east with the business community to the west of Chippenham and in Corsham and relieve traffic in the town. This provides better value for money. The only reason the Council is pushing for the NE link road is to remove the 6,000 cars that will be resident as part of the final development. Even the developer's traffic consultants admitted that most of the car journeys will be residents. Please do not be taken in by the Planning Departments desire to build a NE link road, this

will be for the developers benefit not Chippenham Town. A southern link road is the best value for money, and is shorter, and it has one bridge crossing, and achieves exactly the same benefits promoted by Chippenham 2020.

One clear statement made by Chippenham 2020 from their website “If there is no North East Link road there will be no development in Chippenham Town”

I’ll just repeat that “If there is no North East Link Road there will be no development in Chippenham Town” You may interpret that statement as you wish.

Housing can be accommodated on sites D, A, & E. There would be no need to concrete over the valuable landscape of the river valleys.

Residents in Monkton Park Chippenham and surrounding parishes have suffered from flooding in recent years. 2012, 2013, and 2014. In Bremhill parish a farmer lost 80,000 chickens at Foxham when the Avon flooded on 24<sup>th</sup> December 2013.

Shops in Chippenham were flooded. Roads were closed and many had difficulty getting to and from work for 2 – 3 days.

In 1474 Maud Heath left a bequest to the people of Bremhill, this was to be used to provide a foot crossing to cross the River Avon to allow the farmers to get their goods to market. The path, and crossing are still there today, and is the oldest private footpath in the world. It is still used today for people to get to Chippenham if the Avon floods, those on cycle, motor bike or horseback can take advantage as cars are left stranded in the water. This crossing is about 1km upstream from the proposed development. 600 years ago Maud Heath

recognized the threat of the River Avon, why has the Council not recognized the same the same threat.

The proposed development is on flood zone 1 but adjacent to flood zones 2 & 3.

The Council promised a Flood Risk Assessment 2 at the start of the DPD process, but this was soon downgraded to an FRA 1, this does not require a sequential test. Had an FRA 2 been undertaken it would have directed development to another safer site.

It is clear that the Council wants to develop at C1, and it will adjust the criteria to ensure that C1 is put forward to the Inspector in September.

What is the evidence? The traffic survey has been completed with a favourable emphasis for site C, when Site D clearly scores better

Site C scores the worst for flood risk, the Council reduced the criteria to allow site C to go forward, rather than another safer site be selected.

Site C has been selected even though two experience flood Council officers have expressed reservations on the building to the east. The parish council has written emails from both officers. (Submitted today for evidence for the EIP in September)

And what is all the more concerning the Council has an agreed memorandum of understanding with Chippenham 2020 that the Council will accept the Chippenham 2020

flood report submitted by Waterman in 2012. Why has the Spatial Planning Department agreed to this arrangement?

Council officers should propose that an independent report is conducted if the proposal to delay the submission of the DPD for Chippenham.

There were changes put into the Wiltshire Core Strategy Schedule proposed modifications August 2013 on FRA.

At the cabinet meeting on 9<sup>th</sup> July the Spatial planning team stated no changes were made to the core strategy to down grade the FRA.

Changes were made:

Changes made at SCG 21

Changes made at SCG 22

Appendix A HS121 where clearly it shows that the sequential test is deleted.

Why? As stated a sequential test would have required the Council to move the site to a less risky site, which would have been any of the other four nominated sites.

This clearly makes the choice of this site UNSOUND.

Although the Environment Agency has agreed for the plan to go forward, there is a caveat that a suitable engineering solution be found to prevent run off into the Rivers Avon & Marden.

Should this solution have been modeled prior to going forward to the Inspector in September?

In view of the geological make up of the ground there is a strong possibility this engineering solution will not hold back all the run off water from entering the rivers Avon and Marden.

We heard at the cabinet meeting that the land at Hardens Farm has been subject to recent land drains. So allowing water from the SuDs to flow down to the flood plain will mean that this water will be quickly drained into River Avon. The removal of the drains will mean the land becoming a marsh and not suitable for a riverside park. The Council is unaware of this additional drainage, which will make the implementation of an effective drainage solution even more challenging.

An EA representative on the Flood Working Group expressed reservations on the number of houses being built. (See statement from Willaim Bailey, member of the Flood Working Group)

We have been told that SuDS (Sustainable Urban Drainage Units) will be used.

Research shows that SuDS will fail 50% of the time in winter months, and 20% of the time in Summer months.

This will put Chippenham Town and the surrounding countryside at risk.

The developer will build to within 75 metres of the river Marden, one of the best coarse fishing rivers in southern England. Calne fishing club have fished this stretch of the



river for 40 years, they state that if development goes ahead it will be a disaster for the fishing and the wild life.

Any proposed development will add light and noise pollution into the valley, and in time water pollution as fuel, oil, and plastic will enter the rivers. The river Marden water is classed as pristine, and brown trout, Babel and other fish can be found here.

There are flaws in the Council's plan and this is fully explained in the CAUSE 2015 document which can be accessed on the CAUSE 2015.org website.

The Scott Wilson Flood report identified the land to east of Chippenham as being Oxford and Kellaways Clay and that several years of hydrological testing should be completed before development takes place. The Council will rely on a Flood report undertaken by the developer! We consider that Scott Wilson or another independent Flood engineering company should carry out an independent assessment. And that the Council should engage Scott Wilson to undertake an independent FRA of areas B & C. The cumulative run off from both sites alongside the River Avon could have a serious impact on Chippenham Town, and those downstream

Sir John Pitt (who reviewed the recent flooding in the South West) expressed a concern for the river Avon in the Chippenham area, "The river runs very deep, and is fast flowing, it rises very quickly."

It was admitted at the March Council meeting that the Spatial Planning Team had not read the National Planning Framework Policy Document (Technical) on Climate Change. *This is a major failing when considering building eventually 2,600 houses alongside the River Avon & Marden. It is possible the developer will need these numbers to pay for the bridges and infrastructure. The NPPF document states that river levels will rise by 10% and the flow will increase by 20% over the next 20 years. This will threaten Chippenham and the surrounding countryside before any development is built. How can the Spatial Planning Team miss this evidence, or may be it was convenient not to take note of it.*

Common sense says, do not build to the east of Chippenham, the evidence says do not build to the east of Chippenham, you as Councillors can say no to building to the east of Chippenham, this is your opportunity today to act on behalf of Localism, and preserve the countryside for future generations.

The evidence to build to the East of Chippenham is **unsound**, the Council will tell you otherwise, but if you have read the CAUSE2015 document you will see how badly flawed the Chippenham DPD proposal is.

There are other areas where housing can be sited, without losing valuable landscapes, and recreation for local people.

Development at Site C will threaten Chippenham Town, and the surrounding countryside with flooding, and pollution.

Development at site C will destroy a valuable wildlife habitat at the River Marden.

Development at site will destroy the landscape and two productive farms.

There are serious errors in the Chippenham DPD, the cabinet has admitted that there needs to be a further meeting with the Transport officer, and the Environment Agency in September. **This will be too late for Bremhill parish, and future generations. Do not be swayed to pass the Council's proposal.**

**It is better to get the plan right than submit a weak and risky plan to the Inspector to have it rejected. It was rejected last time, because the traffic survey was challenged. We have found the errors before the QCs this time. Please reject this Plan as unsound as it has been shown here and in supporting documentation from CAUSE 2015.**

**It is clear that the developer Chippenham 2020 is in the driving seat, and has cornered the Council. It is in your power to say NO to the developer, take him off the road and allow the Council to look at a safer, and a less damaging site.**

**This is your opportunity to exercise democracy in Wiltshire, and support David over Goliath.**

**Proposal: Delay submission to the Inspector, and request the Spatial Planning Team to find an alternative site to accommodate additional housing.**