WILTSHIRE CORE STRATEGY
EXAMINATION IN PUBLIC
STATEMENT OF COMMON (UNCOMMON) GROUND

as agreed between
Wiltshire Council

and

CSJ Planning Consultants Ltd representing Chippenham 2020 LLP

Concerning

Non Allocation of land to the East of Chippenham

May 2013

Final Version (03.05.13)
1. **Introduction**

1.1. This Statement of Common Ground (SoCG) is provided in respect of the non allocation of land to the east of Chippenham in Core Policy 2 and 10 of the Wiltshire Core Strategy.

1.2. This Statement is structured to provide the Inspector with clarity of the areas of agreement between the Council and Chippenham 2020 and summarise those areas of dispute. In both respects the comments are structured by the main themes of:

- General
- Employment Strategy
- Transport and Accessibility
- Sustainability Appraisal
- Secondary Schools
- Consultation
- Viability and Deliverability
- Flood Risk

1.3. This Statement does not address Chippenham 2020’s concerns on the strategic housing requirement.

1.4. This Statement has been prepared following the Inspector’s 6th Procedural Letter dated 4 April 2013 requesting that the parties continue to work together with a view to producing a Statement of Common (Uncommon) Ground. It does not address all points of disagreement.

2. **General**

2.1. Both parties agree that the National Planning Policy Framework (March 2012) contains the up to date national planning policy and that the Wiltshire Core Strategy should be in accordance with this policy.

2.2. Both parties agree that Wiltshire 2026 ‘Planning for Wiltshire’s Future in 2009 identified a preferred option for development at Chippenham that included land bring promoted by Chippenham 2020 to the east of Chippenham.

2.3. Both parties agree that the Council’s Cabinet resolved on 20 April 2010 to approve further consultation on the future development options for Chippenham.

2.4. Both parties agree that representations were duly made by Chippenham 2020 to both the Wiltshire Core Strategy Consultation Document (June 2011) and the Wiltshire Core Strategy Pre-Submission Document (February 2012). As part of their representations Chippenham 2020 provided information including their own specialist reports on transport, sustainability, flooding and employment that compare the sites to the south and east.
2.5. Both parties agree that Appendix 3, Topic Paper 12 summarises how the Council has identified the proposed strategic sites within Core Policy 10 (it is acknowledged that Chippenham 2020 do not agree with all of Appendix 3). In relation to the Wiltshire 2026 (October 2009) document, paragraph 3.2 (page 48) uses the following words to summarise the Council’s reasoning for selecting the preferred strategic site option for Chippenham at that stage in the process:

“This option was preferred because it provided one main coherent urban extension to the east and north of Chippenham that would provide a mix of housing and employment, within close proximity of the town centre and the railway station. It could also enable the development of an eastern distributor road. The town centre site would enable regeneration opportunities in the town to be taken forward.”

3. Employment Strategy

Areas of Agreement

3.1 The Roger Tym & Partners Wiltshire Workspace and Employment Land Review (December 2011) which forms part of the Council’s evidence base indicates that the great majority of the employment required to 2026 is for B1 accommodation1.

3.2 It is agreed that Showell Farm, located adjacent to the A350, is located on the edge of the Chippenham urban area away from the town centre.

Areas of Disagreement

3.3 Chippenham 2020’s position is that:

(i) the bulk of Wiltshire’s employment opportunities lie in small businesses with 89% of Wiltshire businesses employing 10 persons or less.

(ii) the town centre should be the starting point and principal focus for an employment strategy, as identified in the NPPF (paragraph 23, ‘ensuring the vitality of town centres’) and a sequential approach should have been taken to employment site selection.

(iii) the Central Area Masterplan should have been produced ahead of the Core Strategy to identify specific central sites. This Masterplan should have informed the Core Strategy, rather than subsequently support it.

(iv) the spatial site selection processes for residential and employment allocations in the South has not been informed by a Sequential Assessment.

(v) no Central Area Masterplan for Chippenham has been produced.

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1 Wiltshire Workspace & Employment Land Review Final Report, December 2011, paragraph 5.65, page 61 (STU/20)
3.4 In respect of each of these points, the Council position is that:

(i) In common with all areas of the UK, businesses registered in Wiltshire are predominately micro-sized (i.e. 1-10 employees), although the share of micro businesses in Wiltshire (87%) is slightly above the national figure of 85%. These micro businesses provide 26% of jobs in Wiltshire\(^2\).

(ii) (iv) While the vitality of the town centre is an important part of the overall economic strategy, it is not the only focus. It should also consider other NPPF requirements including the positive and proactive encouragement of economic growth (paragraph 21).

In doing this, the strategy supports the economic role of Wiltshire’s principal settlements and market towns whilst encouraging inward investment and provides a choice of sites to the market (choice of location, type and use). In Chippenham, to attract inward investment, as well as provide for growth and expansion of existing businesses, a range of employment sites are required to meet the needs of the town and Wiltshire. Attractive greenfield sites close to the strategic road network (A350) on the edge of Chippenham with potential for a mix of B Use Classes (B1, B2 and B8) as well as central opportunity sites equally form an important part of the strategy. Chippenham does not have the critical mass of cities such as Bristol to deliver significant B1(a) uses in the central area.

The sequential approach to employment site selection relates to ‘main town centre uses’ as defined in the NPPF\(^3\). Out of the B1 use classes only B1(a) office use is defined as a ‘main town centre use’, not B1(b) and (c). The Plan identifies those central and edge of centre locations most suitable for office development in Chippenham. ‘Chippenham Central Area of Opportunity’ (Core Policy 9) focuses on redevelopment opportunities close to the town centre and railway station and supports office development (para 5.54) alongside other town centre uses.

(iii) (v) There was no need to prepare a master plan to inform the preparation of strategic policy (Core Policy 9), as it is only required to ensure its implementation which is why it is being progressed at this stage\(^4\).

Paragraph 5.1.13 of the Wilts\(h\)ire Core Strategy Consultation Document (June 2011) recognises this:

“A Chippenham Central Area Masterplan will be developed to provide a framework for the delivery of the aspirations of local people as expressed through the vision statements for Chippenham”.

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\(^2\)Wiltshire Workspace & Employment Land Review Final Report, December 2011, paragraph 3.2 and Table 3.1, page 24 (STU/20)

\(^3\)National Planning Policy Framework, April 2011 paragraph 24 and Glossary (NPP/142)

\(^4\)see Appendix 1 to Wiltshire Council Position Statement on Chippenham (WC-PS-M9c) and Chippenham Masterplan Strategic Framework (CPP/144)
4. **Sustainability Appraisal**

*Areas of Agreement*

4.1 Both parties agree that Sustainability appraisal should be carried out in accordance with European Directive 2001/42/EC, the Environmental Assessment of Plans and Programmes Regulations 2004 and the Planning and Compulsory Purchase Act 2004 (as amended).

4.2 Both parties agree that the sustainability appraisal process is iterative and necessarily evolves as policies and plans develop.

4.3 Both parties agree that the ‘Wiltshire Sustainability Appraisal Report (October 2009)’ informed ‘Wiltshire 2026’ (consultation document to inform the Wiltshire Core Strategy October 2009), which identified the Chippenham 2020 site as part of the preferred option for strategic development at Chippenham.

4.4 Both parties agree that in April 2010, Wiltshire Council’s Cabinet resolved to undertake further public consultation on development options for Chippenham. This comprised of a review of all options at Chippenham and resulted in two options being presented in the Wiltshire Core Strategy Consultation Document (June 2011), which excluded Chippenham 2020’s land.

4.5 Both parties agree that Appendix G (pages 293 to 301, 308 to 316) of the June 2011 Sustainability Appraisal includes a direct comparison of the east (including the Chippenham 2020 site) with the south.

4.6 It is agreed that the Sustainability Appraisal Report (June 2012) at Appendix G recognises that Chippenham 2020 has submitted their own Sustainability Appraisal (by Phlorum Ltd) and that the findings differ from those of the Council.

4.7 Both parties do not agree the reasons why the preferred option status for Chippenham 2020 land referred to in paragraph 4.3 above was removed from the Plan.

*Areas of Disagreement*

4.8 Chippenham 2020’s position is that:

(i) Matters of sustainability are critical to the selection of strategic sites. The findings of the 2009 Sustainability Appraisal, identifying the Chippenham 2020 site as part of the preferred option, have been discounted in subsequent iterations of the SA. There is no clear justification to discount the previously preferred option and the evidence underlying the decision is flawed.

(ii) The only direct comparison of the eastern site against the southern site in sustainability terms is to be found in App G of the 2011 SA (referred to in 4.8 above).

(iii) This comparison was on the basis of the eastern site providing an unspecified number of homes within a second phase, i.e. East of the River Avon.

(iv) In the above comparison the sites scored equally across all 17 indicators.
The results of the above mentioned comparison fed into the sustainability scoring of the options in the 2012 SA.

This work is summarised in Tables 2 and 3 (pages 23 and 26) in paras 7 and 8 of Topic Paper 12.

In Table 2 Options 1, 2 and 3 (Wiltshire Council’s previously preferred option) all have 4 double minus (red) scores but Option 3 only has 3 double plus (green) scores whilst Options 1 and 2 have 6 double plus (green) scores.

By reference to the scores in Table 2, and how these relate to the scores in Table 3, that the same +/- score for Flood Risk and Pollution for Options 2 (east) and Option 5 (south), when added to the scores for Option 1a (north), give single minus scores for new Options 1 and 2 and double minus for the Previously Preferred Option (now Option 3).

The same +/- scores for Poverty and Deprivation, Community Facilities, and Education and Skills for Options 1a, 2 and 5, when aggregated in Table 3, give double plus scores for Options 1 and 2 and single plus scores for Option 3.

The above inconsistencies enabled Wiltshire Council to use the following words in paras 7.2 and 7.4, page 24, Topic Paper 12:

“The SA...was unable to recommend one particular site above other options because one site did not stand out above all others in sustainability....The larger urban extension proposals, in the south and east, were very similar in their assessment scores, and further detailed information would be required to be able to differentiate further.”

Had this work been fairly and accurately recorded and summarised, the conclusion would have been different. Therefore the Sustainability Appraisal is unsound and cannot be relied upon to inform decisions within the Plan.

The SA in terms of appearing to elect for a dispersal as opposed to concentration strategy is not accepted either:-

(a) It is not accepted to be a dispersal strategy;

(b) To be the most sustainable strategy the elements within in also need to be the most sustainable elements;

Reference to paragraph 5.B.10 of A Practical Guide to the SEA Directive (2005) - “However quantification is not always practicable, and qualitative predictions can be equally valid and appropriate...” see the February 013 WCC response to Opinion para 3.18 has to be read in conjunction with para 5.B.11 which follows:

“However, qualitative does not mean ‘guessed’. Predictions need to be supported by evidence, such as references to any research, discussions or consultation which helped those carrying out the SEA to reach their conclusions. The Environmental Report must document any difficulties such as uncertainties or limitations underlying both qualitative and quantitative predictions. Assumptions, for instance about underlying trends or details of projects to be developed under the plan or programme, need to be clearly stated.” The 2011 SA Assessment cannot be supported by reference to “subjectivity”, when objectively the evidence does not support it.
(c) This is a use of a reduced housing number overall in order to seek to bolster the sustainability credentials of the peripheral employment site to the south;

(d) The option of a reduction in numbers (compared to 2009) to the east- which could be properly integrated to the Town Centre- was not identified or accordingly duly consulted upon.

(xiii) Whilst the legal framework and relevant case law identified in the legal submission provided by Chippenham 2020 (referred to as the Opinion) are agreed, the application of that framework to the facts is in dispute.

Chippenham 2020 remain of the view that the framework correctly applied to the facts does show the Sustainability Appraisal to be unsound.

4.9 In response to each of the above points, the Council’s position is that:

(i) The Chippenham 2020 site was identified as the preferred option in 2009. The responses to that consultation, specific events in Chippenham and further evidential analysis on site selection then informed the next iteration of the Sustainability Appraisal published June 2011 and the Wiltshire Core Strategy Consultation Document June 2011. The original conclusions were not set aside but re-evaluated and the Chippenham 2020 site was assessed in the June 2011 Interim Sustainability Appraisal (paragraph 5.7.14) as part of one of the 9 site options. From this assessment of sites two new strategic options were identified (see Appendix 1, pages 6 to 8).

These two new strategic options (with different combinations of land) were assessed as being more favourable in sustainability terms when compared to the 9 options and the Wiltshire 2026 previously preferred option⁶. The conclusion starting at page 41 of draft Topic Paper 14 summarises the reasons for discounting the 2009 preferred option. This included the emphasis on the delivery of employment land to support the strategic employment role of Chippenham in accordance with the Spatial Strategy of the Plan and a more dispersed approach to development at Chippenham.

After June 2011 further evidence was gathered on transport, employment and through consultation, which led to the next iteration of the Sustainability Appraisal in the February 2012 Sustainability Appraisal Report.

The chronology attached at Appendix 1 shows the iterative nature of the Sustainability Appraisal. For every option considered since the 2009 Sustainability Appraisal the criteria and sustainability objectives have been the same.

⁶ Table at Paragraph 5.7.16 compared with Table at 5.7.61 of the Interim Sustainability Appraisal, June 2011
Appendix G of the June 2011 Sustainability Appraisal is not the only iteration which allows a comparison to be undertaken between the east and the south. The Sustainability Appraisal references where the east and south are both assessed is as follows: Appendix G (pages 293 to 301) of the June 2011 Interim Sustainability Report; Appendix I (pages 2, 35 to 43) of the February 2012 Sustainability Appraisal Report; Appendix I (pages 2, 35 to 43) of the June 2012 Sustainability Appraisal Report; and Appendix I (pages 2, 35 to 43) of the September 2012 Sustainability Appraisal Report.

East Chippenham was included in the appraisal process in 2009 as part of strategic options and in combination with Forest Gate Farm in June 2011 (option 2 (of 9)). In response to further consultations in summer 2011 the February 2012 SA Report considered 2 further strategic site options, option 3 included 800 new homes east of Chippenham (see Appendix 1).

While the scoring may be the same in the June 2011 Sustainability Appraisal for the east when compared to the south, the discussion of likely effects and the judgement made in relation to these are different. This, in combination with the judgements and discussions for the rest of the 9 options, helped inform the decision to pursue two new strategic options (see paragraph 4.11(i) above also). The findings for option 2 (east) and option 5 (south) are summarised in paragraphs 5.7.25 to 5.7.30 and paragraphs 5.7.39 to 5.7.44 respectively. In addition, Appendix G provides an assessment of all effects (pages 293 to 301 - east; pages 317 to 325 - south).

Appendix 3 (Site Selection Update for Chippenham), Topic Paper 12 must be read as a whole, as it sets out how the Council has identified the proposed strategic sites within Core Policy 10. Tables 2 and 3, which show the scoring of the Wiltshire 2026 preferred option with the scoring of the June 2011 Sustainability Appraisal 9 options and the June 2011 two new options respectively, should not be looked at in isolation.

It is unclear where these scores have been quoted from. Table 2, Appendix 3, Topic Paper 12 does not contain this information.

It is incorrect and artificial for Chippenham 2020 to aggregate the scores from Table 2 to formulate the scoring in Table 3, as the options in Table 3 were new combinations of land that necessitated an assessment of each option in its own right against the sustainability objectives, which included taking into account previous assessment findings.

There were no inconsistencies in the scoring process and Chippenham 2020 has taken the quotations out of context. Paragraphs 7.2 and 7.4 form part of the summary of the assessment of the 9 options, which lead to the identification of new strategic options 1 and 2 in the June 2011 Wiltshire Core Strategy Consultation Document.

It is the Council's position that the work has been fairly and accurately summarised and recorded with reasonable alternatives assessed. Some
judgement will inevitably be made when carrying out Sustainability Appraisal, which is subjective based on the evidence available at the time of the assessment. The chronology (Appendix 1) demonstrates the iterative nature of the Sustainability Appraisal which has informed the selection of sites within each stage of the Plan’s evolution. It outlines the reasoning why the dispersed approach was favoured (see pages 8 and 11).

(xiii) The Council is of the view that the legal framework has been complied with and is aware of the case law which has been referred to. The difference in view appears to be the application of the law to the facts.

5. Transport and Accessibility

Areas of Agreement

5.1 Both parties agree that the SKM Colin Buchanan, ‘Transport Strategy for Chippenham’ (January 2012), report includes modelling work that considers the Chippenham 2020 site without the ‘Eastern Distributor Road’ in place. It is agreed that the traffic generated by the Chippenham 2020 development was modelled (without a river bridge crossing) loading onto the network via the A4 London Road.

5.2 Both parties agree that in the case of both Options 2 and 3, the North Chippenham site was modelled with the Northern Distributor Road and the Rawlings Green site was modelled with the link road over the railway.

5.3 Both parties agree that in principle the Chippenham 2020 site cannot be developed without a new Eastern Distributor Road linked to the Northern Distributor Road via a new crossing over the railway line.

Areas of Disagreement

5.4 Chippenham 2020’s position is that:

(i) The SKM Colin Buchanan, ‘Transport Strategy for Chippenham’ (January 2012), report includes modelling work that considers the Chippenham 2020 site without the ‘Eastern Distributor Road’ in place. The traffic generated by the Chippenham 2020 development was modelled without a river bridge crossing thereby loading onto the network via the A4 London Road.

(ii) In the case of both Options 2 and 3, the North Chippenham site was modelled with the Northern Distributor Road and the Rawlings Green site was modelled with the link road over the railway.

(iii) the Chippenham 2020 site should have been modelled in the Transport Strategy with the benefit of the Eastern Distributor Road, as it is essential infrastructure and not mitigation.

Please see paragraphs 3.23 to 3.24 of the Council’s February 2013 Response to Mr Gary Grant’s Opinion which appears to Chippenham 2020 to indicate to the contrary.

8 Not stand alone.

9 Not stand alone.
the overall conclusion within the Transport Strategy that “no particular option comes out as a clear preferred option in transport terms” (paragraph 8.4) is wrong, as the Chippenham 2020 site is better than the south, as would have been shown had it been modelled with the completed Eastern Distributor Road.

the Chippenham 2020 site is closer to the town centre (and key facilities including Wiltshire College, the railway station and leisure centre) than the south and should score higher in the Sustainability Appraisal10.

5.5 The Council’s position is that:

(i) (ii) (iii) it was appropriate to model the Chippenham 2020 site as a standalone development without the Eastern Distributor Road and to assess the site with the road as mitigation. - an explanation was provided at paragraph 3 to 9, Appendix 3 of the Council’s letter to the inspector dated 22 March 2013;

(iv) SKM Buchanan has indicated that there are a number of possible approaches that could be taken to such an assessment, the approach taken is credible and the overall assessment within the Transport Strategy is sound (see final paragraph Appendix 2, Council’s letter to the Inspector dated 22 March 2013). The Entran Ltd modelling on which Chippenham 2020 rely on is based on an incorrect assumption that the traffic generated by the Chippenham 2020 site would load onto the network via a new link road over the River Avon connecting with the rural green site. As such, the report would need to be significantly revised.

(v) the Sustainability Appraisal has considered distance of options between the town centre, although no site was close enough to the town centre where a significant modal shift to sustainable modes of transport could be expected. The scale of development of every option, whatever the location, was scored as significant adverse effect because of the large increase in traffic volumes expected.

6. Secondary schooling

Areas of Agreement

6.1 Both parties agree that Hardenhuish and Sheldon Schools are at capacity.

6.2 Both parties agree that Abbeyfield School has spare capacity and could be expanded, and that the Chippenham 2020 site is located close to the school.

6.3 Both parties agree that Abbeyfield School has potential to physically expand to accommodate the extra school places that arise as a result of the new housing.

6.4 Both parties agree that for every 100 houses that are occupied there will be the need to provide 22 new secondary school places based on the Council’s current policy and

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10 The particulars of the superiority of the Chippenham 2020 site (with particular reference to a comparison to the south) in transport terms is set out in the Entran report (App 2 to Chippenham 2020, March 2012, submission).
as reflected within the paragraph 7, page 45, Wiltshire Infrastructure Delivery Plan 2011-2026.

6.5 Both parties agree that based on this calculation for the 2250 new homes provided for in the strategic allocations for Chippenham around 500 secondary school spaces would be required.

Areas of Disagreement

6.6 Chippenham 2020’s position is depicted in Map A. This shows the most likely routes by which children will travel to Abbeyfield School from the strategic sites currently proposed in the core strategy. The ‘Wiltshire 2026 preferred option’ would ensure that not one single extra child will need to travel via the town centre.

6.7 The Council’s position is that children of secondary school age from all sites, because parents will exercise parental choice, can attend any of the three secondary schools in Chippenham (two of which are in the north west of Chippenham). As such Map A does not show a fair reflection of potential routes to secondary schools for all sites.

7. Consultation

Areas of Disagreement

7.1 Chippenham 2020’s position is that;

(i) In Table 4, starting on page 29 of Appendix 3 of Topic Paper 12, is the Site Selection Analysis which seeks to explain the identification of Options 1 and 2 in the 2011 Consultation Document. This table includes analysis of 11 sites including the East (Site 3 – Rawlings Farm and Site 4 – Hardens and New Leaze Farm) and the South (Site 9 – Rowden and Patterdown).

(ii) This considers sites 3 and 4 together.

(iii) Within Table 5.3 (Chippenham strategic housing options - March 2011) on page 93 of the 2012 SA, the above sites compare loosely to site 2 East Chippenham and Site 5 Patterdown and Rowden.

(iv) The Community Feedback for Sites 3 and 4 (page 38 of Table 4) is summarised as follows:-

“During Wiltshire 2026 and since then, the local community have objected to the proposed allocation and development at east Chippenham because of:

(a) the detrimental impact development could have on the Monkton Park Estate, particularly in terms of the risk of surface water flooding and the proposed access route through the estate.
(b) the visual impact of development at east Chippenham on nearby villages with the Bremhill Parish such as Tytherton Lucas.

(c) the risk of flooding and surface water flooding upstream towards Tytherton Lucas.

A Monkton Park Residents Survey indicated that the issues of most concern for those who responded was traffic congestion caused by traffic travelling into town via Station Hill. One of the suggestions during consultation as a way to foster links between education and employers is to develop a business hub and housing for key workers in the Abbeyfield School area.”

(v) The Community Feedback for Site 9 (page 50 of Table) is summarised as follows:-

“Comments submitted during Wiltshire 2026 suggested that development could take place south of the town. Additional consultation has taken place since then in which the desire has been expressed to see employment development and that there may be opportunities for pockets of development in the Showell Farm area.”

(vi) The above represents the identified community feedback which contributed to the subsequent identification of options.

(vii) On page 55 of Appendix 3 of Topic Paper 12 it is stated (under Site Selection Update for Chippenham following Wilts Core Strategy Consultation 2011) as follows:-

“The responses from the WC Core Strategy Consultation June-August 2011 show there is a mix of views about the proposals for Chippenham. There were 550 responses altogether. 17 of the responses specifically supported Option 1 whilst 8 specifically supported Option 2. Some respondents although they gave support to either Option 1 or 2, went on to give reasons as to why they didn’t support the options outright. The majority of the responses did not support either Option 1 or 2 including the proposed level of development, but some did appear to support specific elements of the proposed strategy, although they didn’t acknowledge this.”

(viii) The above is WC’s summary of the 2011 consultation responses.

(ix) Para 9.5 on page 56 of Appendix 3 of Topic Paper 12 lists nearly a page of objections to development to the south of the town by Lacock Parish Council which are not reflected or mentioned in the summary’s referred to above.

(x) Para 9.6 on page 57 lists half a page of comments from Chippenham Vision, which are not reflected in the summary’s above, including the following:-
• “A transport mechanism (such as a link road) is urgently required to divert through traffic to and from the east and thereby relieve congestion and make access to the town centre easier. Future major developments should be required to enable such a link and other means for new residents to access the town centre.

• Access to Abbeyfield School is currently poor from the majority of the town. Improved sustainable transport links from existing and new development are required.

• The omission of the previously preferred Eastern development option needs a much clearer rationale to illustrate why it is believed to be no longer viable. With the dropping of the originally preferred East Chippenham Option, the prospect of a north-east link has been removed. Because of the lack of transport analysis, the Vision does not believe this was taken into account when this option was dropped.”

(xii) Within appendix 5 in the CH2020 2012 Evidence Pack an analysis shows that 328 respondents specifically opposed development to the south of Chippenham, 43 specifically opposed development to the north or east, and 124 specifically supported either development to the north or east, or development which would deliver a link road around the north east of the town.

As demonstrated above, the consultation responses are not fairly or accurately reflected by Wiltshire Council in the Core Strategy documentation.

7.2 The Council’s position is that;

(i) (iv) These points include extracts from Table 4 Appendix 3 of Topic Paper 12 taken out of context. Sections 6-8, which includes Tables 2, 3 and 4 need to be considered in full for a summary of the work that took place following Wiltshire 2026 and ultimately led to the identification of strategic Options 1 and 2 in the 2011 Wiltshire Core Strategy Consultation Document. This included holding two consultation workshops which considered the 11 sites (i) set out in Table 4. It is incorrect to assume that Table 4 alone is the site analysis for Chippenham as it only sets out a summary.

The Community feedback sections in Table 4 provide a summary of the key points which were considered to have emerged from the workshop consultations on the 11 sites. It was the full representations made at the workshops (paragraph 6.7 and 6.12 provide links to the source documents) which contributed to the subsequent identification of options.

(ii) Table 4 considers Sites 3 and 4 of the 11 Sites together (Appendix 3, Topic Paper 12) because at that time the developer (Barratts) was promoting both sites together (although Site 3 is identified as Phase 1 and Site 4 is identified as Phase 2).

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11 Chippenham Workshop (March 2011) and STU/106 Chippenham Visioning ATLAS Report on Visioning Event held on 23 September 2010 (CON/20)
12 Chippenham Workshop (March 2011) and STU/106 Chippenham Visioning ATLAS Report on Visioning Event held on 23 September 2010 (CON/20)
(vii) (viii) Topic Paper 12 Appendix 3 Section 9 (pages 93-100) gives a summary of the responses received during the Wiltshire Core Strategy Consultation 2011. Full details of the consultation responses are detailed in the Wiltshire Core Strategy Consultation Document, Consultation Statement, Appendices and Record of Comments.\textsuperscript{13}

(ix) (x) Lacock Parish Council and Chippenham Vision Board comments were made during the June 2011 consultation, which was after the consultation responses for the 11 sites which are summarised in Table 4. The summary of comments from Chippenham Vision and Lacock Parish Council have been listed in Section 9 (paragraphs 9.6 and 9., Topic Paper 12) with the Council’s response set out in Section 10 (paragraphs 10.1 to 10.35), which included reflecting back on the previous evidence and where appropriate reference was made to the new evidence which had come to light following the June 2011 consultation e.g. Workspace and Employment Review 2011; Chippenham Traffic Modelling Work and Wiltshire Historic Landscape Assessment.

(xi) The numerical analysis provided by Chippenham 2020 at Appendix 5 of the evidence pack is too simplistic, the Council has considered the detail of each response in the round at each stage in the process.

(xii) It is considered that the consultation responses have been fairly and accurately reflected by the Council in the Core Strategy documentation.

8. Viability and Deliverability

Areas of Agreement

8.1 Both parties agree that viability was not a factor that informed the decision to discount the eastern site as a Strategic Site.

Area of Disagreement

8.2 Chippenham 2020’s position is that the Chippenham 2020 site compares more favourably than the south in terms of its ability to deliver transport and green infrastructure requirements.

8.3 The Council’s position is that all strategic sites identified are deliverable.

\textsuperscript{13} Working Towards a Core Strategy for Wiltshire – Wiltshire Core Strategy Consultation Document - Consultation Statement Jan 2012 and Con/26 Wiltshire Consultation 2011 Responses to Question 5 - Chippenham Community Area (CON/16)
9. **Flood Risk**

*Areas of Agreement*

9.1 Both parties agree that the Waterman’s FRA submitted by Chippenham 2020 in October 2012, is a piece of evidence which the Inspector can consider in the context of the Examination.

9.2 Both parties agree that this evidence considers points of concern that the Council has with regard to flooding and its impact upon sites to the east of Chippenham.

**Signed on behalf of Wiltshire Council (Local Authority)**

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Name: Georgina Clampitt-Dix  
Position: Head of Spatial Planning, Economy and Regeneration, Wiltshire Council  
Date: 3 May 2013

**Signed on behalf of Chippenham 2020 LLP (Developer)**

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Name: Michael Orr  
Position: Director, CSJ Planning Consultants Ltd  
Date: 3 May 2013
# APPENDIX 1: Wiltshire Core Strategy Sustainability Appraisal chronology of events relating to assessment of Chippenham sites/policies (Not agreed by Chippenham 2020)

<table>
<thead>
<tr>
<th>Plan-making stage</th>
<th>Date</th>
<th>What was considered in the Core Strategy SA Report with regards Chippenham policies/sites?</th>
<th>SA Report findings and reasons for those findings</th>
<th>Link to SA Report and further Core Strategy evidence</th>
</tr>
</thead>
<tbody>
<tr>
<td>North Wilts DC</td>
<td>May 2007</td>
<td>The former district council published its Core Strategy issues and options draft which considered three options for the location of development, including the scale of development in north Wiltshire. An SA Report was published for consultation alongside that document. The three spatial options considered in the Core Strategy were:</td>
<td>The North Wilts DC Issues &amp; Options SA Report that was published alongside the Issues &amp; Options report assessed the proposed Core Strategy strategic objectives only (paras. 5.2 and 5.3). The 3 spatial options were assessed as part of the SA for Wiltshire 2026 (October 2009) - see next entry. No further iterations of a North Wilts Core Strategy were published after May 2007 and prior to formation of Wiltshire unitary authority.</td>
<td>(CON/60) North Wiltshire Core Strategy Second Issues and Options Consultation Paper</td>
</tr>
<tr>
<td>Issues &amp; Options</td>
<td></td>
<td>Spatial Option 1: Tier 1 – Chippenham Tier 2 – Calne, Corsham, Malmesbury and Wotton Bassett Tier 3 – Ashton Keynes, Box, Bradenstoke, Christian Malford, Colerne, Cricklade, Curdwell, Derry Hill, Great Somerford, Hullavington, Kington St Michael, Luckington, Lyneham, Oaksey, Purton, Sherston, Sutton Benger and Yatton Keynell.</td>
<td>The Issues &amp; Options SA Report explains (para 4.3) that the SA is limited in its scope, as it concentrates on testing the strategic objectives. The SA Report explains (para 4.4) that ‘this was due to the Core Strategy Issues and Options document largely consisting of a series of questions to establish what the views are on the overall context for future growth in North Wiltshire. Only when this process is complete and the outcomes used to inform the Preferred Options document will there be options with enough detail and focus to appraise.’ The SA Report points to (para 4.4) the 2005 ODPM SA guidance (now officially replaced with guidance by PAS) to justify the lack of spatial options assessment, which states that ‘The SA Report must be issued with the DPD during the pre-submission public participation stage on the preferred option or options under Regulation 26 of the Local Development Regulations.’ The SA Report further explained (para 4.5) that SA work is still underway and will continue to be developed and revised in preparation for the final sustainability appraisal report which will accompany the Preferred Options stage of the Core Strategy DPD.</td>
<td>(SUS/37) North Wiltshire Core Strategy Issues and Options Sustainability Appraisal</td>
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<td>SA Report</td>
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<tr>
<td>Scale of Development:</td>
<td></td>
<td>Draft RSS: Chippenham 4500; Elsewhere: 4500; West of Swindon: 1000</td>
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<td>Proposed Options for Growth at Chippenham</td>
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<td>Identified that the expected growth cannot be accommodated in the existing urban area resulting in a need for new expansion. The options were:</td>
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<td>1. Rely upon existing allocations of land supplemented by windfall and development on previously developed land.</td>
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<td>2. Bring forward all large promoted sites.</td>
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<td>3. Concentrate on the promotion of growth to the south of Chippenham. This would include a southern distributor road or a link road across the River Avon.</td>
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<td>4. Concentrate on the promotion of growth in the eastern direction. This would include a northern and eastern distributor road.</td>
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<td>5. Incremental growth on a small-scale in numerous locations.</td>
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<td>Wiltshire 2026 SA Report (Wiltshire Council)</td>
<td>Oct 2009</td>
<td>An SA Report was published for consultation alongside 'Wiltshire 2026 - Planning for Wiltshire’s future'. It considered spatial options and strategic site specific options:</td>
<td></td>
<td>(CON/04) Wiltshire 2026 Planning for Wiltshire’s Future - Consultation document to inform the Wiltshire Core Strategy (Oct 2009)</td>
</tr>
<tr>
<td>1. Spatial options assessed</td>
<td></td>
<td>Three spatial options (as described above) that were originally published by North Wilts DC were assessed (paras 5.4.3 - 5.4.11) using SA objectives. A summary of assessment findings is shown in Table 5.6 (para 5.4.11) of the SA Report.</td>
<td></td>
<td>(SUS/30) Wiltshire 2026 - Wiltshire Sustainability Appraisal Report (Oct 2009)</td>
</tr>
<tr>
<td>1. Spatial options assessed</td>
<td></td>
<td>SA Report concludes (paras 5.4.9 - 5.4.11) that Option 3 performs much more positively overall than Options 1 and 2.</td>
<td></td>
<td>(STU/104) Wiltshire 2026 Strategic Sites Background Paper (Oct 2009)</td>
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<td>Overall, a similar SA assessment was recorded for Options 1 and 2, although Option 2 had the least positive outcome. This was as the majority of growth was directed to only Chippenham and Calne which was thought likely to be at the expense of the</td>
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2. Strategic site options assessed

Wiltshire 2026 sets out the general location of preferred site options for sites to help provide for growth within each community area, and provides a brief description of the option, together with the reason for its choice. A fuller description of the preferred option, together with the alternative options considered and the reasons why these were not selected, is given in the ‘Strategic Sites background paper’ (October 2009). Wiltshire 2026 states that ‘the preferred options do not at present represent the Council’s policy but are presented for public consultation and detailed consideration because, on the basis of the information currently available to the council, they appear to represent the best options for the delivery of housing and employment across Wiltshire, in response to the perceived local needs. Your views on section 3 and the selection of the preferred options are therefore most important” (para 1.9).

Four spatial options (the one described as ‘preferred’ in Wiltshire 2026 and three reasonable alternatives) were considered in the SA Report (paras 6.4.1 - 6.4.16):

Strategic Site Option 1 - a mixed use urban extension to the north of Chippenham for up to 800 dwellings, combined with a mixed use urban extension to the east provision of improved facilities associated with increased development within the other main settlements.

Option 3 performed much more positively overall as development was focused on a combination of a wider range of market towns and a narrower range of larger villages. This was thought to maximise community value and minimise the scale of growth being directed towards locations with poorer accessibility. Option 3 was identified as the preferred option and following further work set out in the Spatial Strategy.

2. Strategic site options assessed

The SA Report noted (paras 6.4.17 - 6.4.19) that the assessment had found a “high degree of similarity between the four options”. However, Options 1 and 2 were found to be the most favourable out of the four options assessed, in sustainability terms, and Option 3 the least favourable in sustainability terms.

Likely significant negative effects were identified for all of the options assessed and mitigation was suggested to be required if development were to proceed. A particular issue related to the topics of Air Quality and Pollution and Transport, and it was suggested that all of the options would need careful phasing, the provision of new employment and the implementation of sustainable transport solutions, to ensure the sites are as self-contained as possible.

A number of likely minor positive and negative effects were also identified. The detailed SA assessment for strategic site options at Chippenham is set out within Appendix 5 (Table A5.1) of the SA.

The SA Report states that the SA process helped to inform selection of a preferred option for Chippenham and that Option 1 was identified as
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<td>of the town for up to 2850 dwellings;</td>
<td>preferred in the Wiltshire 2026 document.</td>
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<td><strong>Strategic Site Option 2</strong> - the eastern urban extension identified within Option 1, but with a higher number of dwellings, for up to 3650;</td>
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<td><strong>Strategic Site Option 3</strong> - a southern urban extension site of up to 3650 dwellings; and</td>
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<td><strong>Strategic Site Option 4</strong> - a combination of the northern urban extension included within Option 1, with the southern urban extension included in Option 3, with a lower level of growth for up to 2850 dwellings.</td>
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<td>In addition, all four options consisted of proposed employment sites located to the south of Chippenham and town centre regeneration sites for up to 350 dwellings.</td>
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**Decision Making: 20 October 2009**
Following the coordination, annexation and updating of all former District Council work, Wiltshire Council’s Cabinet considered and approved the ‘Wiltshire 2026’ consultation document for public consultation in October 2009.
(DEM/09) Wiltshire County Council Cabinet - Wiltshire Core Strategy Public Consultation Document

**Decision Making: 20 April 2010**
Following the logging and consideration of the ‘Wiltshire 2026’ consultation representations, a report was presented to Cabinet outlining the next steps to be taken in the preparation of the Wiltshire Core Strategy.
(DEM/10) Wiltshire Council Cabinet - The Next Steps in Developing the Wiltshire Core Strategy

- Wiltshire Council’s Cabinet approved further public consultation be undertaken on development options for Chippenham.

**Wiltshire Core Strategy Consultation Document Interim SA Report**
June 2011
The SA Report that was published for consultation alongside the Wiltshire Core Strategy Consultation Document (June 2011) summarised the key findings of the Wiltshire 2026 SA Report, including the findings for the North Wiltshire DC spatial options and strategic site options (paras 4.3.12 - 4.3.14). The summary of the 2009 SA findings (para 4.4.3) reiterated that the SA had

(SUS/19) Working towards a Core Strategy for Wiltshire - Interim Sustainability Appraisal Report (June 2011)
(CON/01) Working towards a Core Strategy for Wiltshire - Wiltshire
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|                   |      | "helped identify a preferred strategic option to take forward for each settlement". It listed in Table 5 (para 4.4.3) the preferred option for Chippenham (from) Wiltshire 2026 as ‘3650 dwellings, employment land and mixed use development located to the northeast and east of Chippenham and a town centre strategic site’. The SA Report went on to further assess Chippenham Core Policies 4 and 5 and further strategic sites for Chippenham as outlined below: | 1. Core Policy 4 - Chippenham Central Area of Opportunity Two options were assessed (para 5.6.2) for this policy: Policy Option 1: Adopt the policy as proposed; that is, development with the benefit of an overarching Vision Policy Option 2: Develop sites as Option 1, but in accordance with standard planning policies and without the benefit of an over-arching vision | Core Strategy Consultation Document (June 2011) The nine site options were derived from sites identified/promoted in the SHLAA. (TOP/25) Draft Topic Paper 14 Site Selection Process Wiltshire Core Strategy Consultation - Appendix 1 explains the site selection process for Chippenham |}

1. Core Policy 4 - Chippenham Central Area of Opportunity

The SA Report concluded (paras 5.6.3 - 5.6.6) that policy Option 1 was likely to be the most sustainable option. Option 1 was found likely to be the most sustainable option because significant benefits were considered likely with regards biodiversity, landscape, housing, healthy communities, access to community facilities, transport, the local economy and employment. The number of benefits of this policy option far outweighed those considered likely from Option 2.

2. Core Policy 5 - Spatial Strategy: Chippenham Community Area

Two options were assessed (para 5.7.2) for this policy:

Policy Option 1: Adopt the policy as proposed

Policy Option 2: Do not regulate development according to an overall spatial strategy, but allow the market to determine level and location of both housing and employment, and to provide infrastructure

The assessment found (paras 5.7.3 - 5.7.11) that both options resulted in very similar scores. The significant positive and negative effects highlighted relate mainly to the levels of housing and employment growth proposed in Chippenham.

The SA Report concluded (para 5.7.12) that, despite the assessment of both options being very similar, Option 2 does not encourage a sustainable form of development but rather would leave it up to developments to come forward as and when. This may not result in developments being located in areas where adverse impacts are minimised. Effects

Chippenham Visioning Event (STU/106) Chippenham Visioning - ATLAS report on the visioning event of the 23rd of September 2010

Chippenham Workshop (CON/20) Chippenham Workshop - Report of the event held on 14th March 2011

The housing requirement was discussed at the second event. Broader evidence set out in (TOP/21) Topic Paper 15 Housing Requirement Technical Paper
### Plan-making stage | Date | What was considered in the Core Strategy SA Report with regards Chippenham policies/sites? | SA Report findings and reasons for those findings | Link to SA Report and further Core Strategy evidence
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### 3. Strategic housing site options assessment

After the publication of *Wiltshire 2026* and before the publication of the Core Strategy Consultation Document in June 2011, Wiltshire Council carried out a review of strategic sites to assess whether the sites were still strategic. Through this review the Council identified and assessed (paras 5.7.14 - 5.7.58) through the SA nine new strategic site options for Chippenham. This SA assessment was first consulted on in the June 2011 consultation. These nine further site options (listed after para 5.7.14) were:

**Site option 1a** - North Chippenham (North Chippenham Consortium)

**Site option 1b** - North Chippenham (Robert Hitchins)

**Site option 2** - East Chippenham

**Site option 3** - Forest Farm

**Site option 4** - South of Pewsham

**Site option 5** - Patterdown and Rowden

**Site option 6** - Hunters Moon

**Site option 7** - West Chippenham

**Site option 8** - Town centre strategic site

From the review of strategic sites and SA of these nine options, the council decided to take forward two new strategic site options (listed after para 5.7.60) into the June 2011 Core Strategy document and to consult on both. These were:

**Site Option 1**: Delivery of suitable brownfield sites in the town; Non Strategic site; land SW Abbeyfield School; Strategic Option 1: North East Chippenham Site Allocation; South West Chippenham Area of Search.

**Site Option 2**: Delivery of suitable brownfield sites in

would very much depend on where development is located, the type of development and mitigation measures proposed to reduce or avoid adverse effects.

### 3. Strategic housing site options assessment

The SA Report at paragraphs 5.7.14 - 5.7.54 summarises the assessments of the 9 site options presented in Appendix G (pages 278 to 348) and conclusions are drawn at paragraphs 5.7.55 - 5.7.58 on the assessment of the nine strategic site options.

Of the nine strategic options assessed, the SA Report concluded that, at that stage, it was unable to recommend any one particular site above other options. Development could be considered in a number of locations to maximise the strengths that each site offers, whilst avoiding areas of particular environmental concern, including the River Avon meadows and Birds Marsh Wood. It was recommended that further consideration was given to the locations for strategic housing in Chippenham, taking account of the findings of that SA work.

The SA stated that the town centre strategic option was likely to give the greatest benefits overall in terms of proximity to existing services, facilities and public transport hubs, making use of brownfield sites and being able to provide higher density development. However, in terms of housing provision, it is only likely to meet a fraction of future need in Chippenham and there are some constraints relating to impacts of development on heritage areas, listed buildings and valued landscapes, including the River Avon meadows.

The larger urban extension proposals, in the south and east, were very similar in their assessment scores, and further detailed information would be required to be able to differentiate further. The

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Not agreed by Chippenham 2020
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<td>the town; Non Strategic site- land SW Abbeyfield School; Strategic Option 2: North East Chippenham Site Allocation; South West Chippenham Area of Search; East Chippenham Site Allocation.</td>
<td>smaller site options assessed, on their own, would be unlikely to result in the same level of environmental, social and economic benefits as the larger options across the range of sustainability objectives, unless combined with the larger options. However, the smaller size of these sites and their location meant there were fewer environmental impacts than the larger options. <strong>Consideration of the two further strategic site options</strong> - Two new strategic options were derived from the assessments of the 9 options. This took into account maximising the strengths each site offered (paragraph 5.7.58), the judgements made in the assessments of the 9 options, consideration of views expressed by stakeholders and other interested parties through consultation events in September 2010 and March 2011 (paragraph 5.7.59), the proposed reduction in housing numbers and evidential analysis. The summary of SA findings of those two further options is presented in paragraphs 5.7.62 - 5.7.88, with the more detailed assessment in Appendix G (pages 349 to 375), with further information provided within the Core Strategy and Topic papers. Appendix 1, Topic Paper 14 ‘Site selection process’ sets out how the two options were identified (Section headed - ‘Full reappraisal of all options in Chippenham’.) The SA stated (paras 5.7.85-5.7.88) the similarity in the assessment scores and that there are no absolute constraints to development at any of the sites. The SA Report suggested that both options distribute development on a number of sites which could mean there are fewer environmental impacts as there are opportunities to avoid development in proximity to sensitive environmental receptors. The more dispersed nature of these new options will</td>
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<tr>
<td>4. Strategic employment site options assessment</td>
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<td>allow adverse impacts to be reduced as development is not concentrated in one place. There will be a more localised impact of development distributed over several areas of the highway network, although perhaps reduced scope to deal with highway capacity issues in a coherent manner and to deal with significant infrastructure requirements.</td>
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<td></td>
<td>The SA Report stated in relation to these options that further details of strategic sites were needed in order to make a more detailed assessment, including specific details of levels of sustainability being incorporated into developments, details of specific transport improvements and details of environmental mitigation measures.</td>
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<td></td>
<td>Site Option 1: Hill Corner</td>
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<td>significant adverse effects on biodiversity were considered likely, including indirect effects on Birds Marsh Wood - a County Wildlife Site (CWS) and priority habitat area. Development considered likely to increase recreational pressure on this area. The issue of recreational pressure on Birds Marsh Wood would need to be resolved, perhaps through limiting access or creating significant GI links that are more convenient for people to use. A sufficient sized buffer zone would also be required.</td>
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<td>Site Option 2: Hunters Moon</td>
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<td>no significant effects were considered likely, either positive or negative. No specific constraints to development in terms of effects on any designated areas.</td>
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<td>Site Option 3: Showell Farm</td>
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<td>the SA considered that the size of this proposed employment site meant that there are likely to be significant benefits for the local economy</td>
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<td>and employment opportunities. There will also be likely benefits in terms of improving income levels of local people and reducing social exclusion. However, it was noted that this location is remote from Chippenham town centre and the site is not adjacent to the urban area. This is a rural area and impacts relating to traffic, air pollution, noise and light could be significant.</td>
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**Decision Making: 24 May 2011**

Having reviewed all consultation material received to date; and revised the emerging Wiltshire Core Strategy accordingly, Cabinet considered proposals for a further round of public consultation. Approval of the draft document and all supporting evidence was provided following discussion at the May Cabinet meeting.

(DEM/11) Wiltshire Council Cabinet - Wiltshire Core Strategy Consultation Document

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**Wiltshire Core Strategy Pre-Submission Document SA Report**

(Jan) Feb 2012

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<tr>
<th>Chippenham Central Area of Opportunity (renumbered Core Policy 9)</th>
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<tr>
<td>The SA Report provided a summary (Section 4) of previous Core Strategy SA work undertaken, including for those Core Strategy consultations listed above.</td>
<td>No significant adverse effects were considered likely (para 5.11.6) from implementation of either option.</td>
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1. Chippenham Central Area of Opportunity (renumbered Core Policy 9)

The SA Report considered (Section 5.11) the same two options as stated for Wiltshire Core Strategy Consultation Document Interim SA Report. The assessment had been reviewed and updated to take account of more up-to-date evidence for Chippenham and to take account of the previous consultation responses.

 Significant benefits were considered likely (para 5.11.6) through Option 1 which would be implemented through a Chippenham Central Area Master Plan, to be developed to provide a more detailed framework for the delivery of the regeneration opportunity sites. Option 1 was thought likely to lead to significant benefits in terms of transport and the local economy.

 Option 1, implementing the policy as proposed, was thought likely (para 5.11.7) to lead to more significant and positive effects, as it benefits from a cohesive overall plan aimed at achieving sustainability goals as well as growth. Option 1 was considered the more favourable option in sustainability terms.

2. Spatial Strategy: Chippenham community area (renumbered Core Policy 10)

(STU/20) Wiltshire Workspace & Employment Land Review (Dec 2011)


(STU/52) Historic Landscape

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(WCS/01) Wiltshire Core Strategy Pre-submission Document (Feb 2012)

(SUS/11) Working towards a Core Strategy for Wiltshire - Sustainability Appraisal Strategic Environmental Assessment (Feb 2012)

(TOP/18) Topic Paper 12 Site Selection Process

Appendix 3 explains the site selection process for Chippenham, informed by the SA, outcomes from June 2011 consultation and updated evidence including:
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<td>The SA Report considered (para 5.12.2) two options for this policy. Policy Option 2 was amended from that option previously considered in June 2011 as it was recognised that previous Option 2 (did not regulate development according to an overall spatial strategy) could be considered to not be a reasonable alternative as the Core Strategy is proposing an overall spatial strategy for Chippenham. The amended policy Option 2 is:</td>
<td>Option 1 was considered (para 5.12.13) the most sustainable option because of the greater level of benefits it will bring to the community area, particularly regarding levels of growth, infrastructure provision and preventing development in unsustainable locations. The policy as proposed highlights specific issues that need to be taken into account as and when development comes forward; it specifies a level of housing and employment growth that is appropriate to the community area, taking into account current evidence and issues that have been highlighted through consultation, discussions with stakeholders and through the sustainability appraisal.</td>
<td>Assessment for the Wiltshire Core Strategy (Jan 2012) (TOP/18) Topic Paper 12 Site Selection Process Appendix 3 Section 10 Page 98 onwards - Consideration of representations made to Chippenham Proposals. Includes SA Update. Section 11 Page 109 onwards - Review of Strategic Sites Following Core Strategy Consultation June 2011. Includes reasons for identifying Option 2 and reasons for not identifying Hardens Farm and New Leaze Farm.</td>
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<td>'Do not have a specific policy for the Chippenham Community Area but allow the market to determine the level and location of housing, employment and infrastructure in the community area'.</td>
<td>Option 2 was considered (para 5.12.14) a less sustainable option because it does not encourage a sustainable form of development and may lead to development coming forward in less sustainable locations without adequate mitigation and infrastructure that can reduce potential effects.</td>
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<tr>
<td>3. Strategic housing site options assessment</td>
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<td>The SA Report listed and summarised (paras 5.12.16 - 5.12.24) the findings of the sustainability appraisal of all previous strategic site options considered, including those from Wiltshire 2026 (October 2009) and Wiltshire Core Strategy Consultation document (June 2011). The SA Report, having summarised the assessment findings of all previous strategic site options from previous Core Strategy iterations, then explained (para 5.12.25) that following on from further consultation with interested stakeholders and developers between June - August 2011, the council then considered two further strategic site options, in addition to the two strategic sites proposed in the June 2011 consultation document. These were (listed after para 5.12.25 Table 5.5):</td>
<td>3. Strategic housing site options assessment The SA Report found (paras 5.12.27 - 5.12.77) that a number of positive and negative significant effects were considered likely with each option and these were highlighted taking into account the latest information available.</td>
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<td>Strategic site Option 3</td>
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<td>Strategic site Option 3 - Delivery of suitable brownfield sites in the town; Non Strategic site - land SW</td>
<td>It was considered that there were no absolute constraints to development in sustainability terms for any of the options and at any individual site location. Significant adverse effects were envisaged for all options against sustainability objectives relating to land and soil, water and climatic factors - this was due to the level of growth proposed. Significant benefits were envisaged for all options against sustainability objectives relating to housing, economy and employment, again because of the level of growth proposed. (para 5.12.69)</td>
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<td>Abbeyfield School; North Chippenham site allocation - 750 dwellings; East Chippenham site allocation (Rawlings Green) - Up to 700 dwellings; <strong>East Chippenham site allocation - Up to 800 dwellings at Harden's Farm and New Leaze Farm (Chippenham 2020)</strong>&lt;br&gt;&lt;br&gt;<strong>Strategic site Option 4</strong> - Delivery of suitable brownfield sites in the town; Non Strategic site - land SW Abbeyfield School; Land to the south of Chippenham including Showell Farm - 2250 dwellings</td>
<td>Mitigation was thought to be possible to reduce the significance of some of these effects and was thought likely to take place at site level and at the wider transport network level including through measures to reduce transport impacts, reduce environmental impacts and measures to maximise the sustainability standards of new buildings to increase energy and water efficiency, including renewable energy provision. (para 5.12.70)</td>
<td>Options 1, 3 and 4 were considered likely to lead to significant adverse effects on the sustainability objectives relating to air quality and environmental pollution and transport because the majority of new development would be concentrated in one location. Option 2, however, was not considered likely to lead to significant adverse effects in these areas because of the dispersed nature of development; this would result in the dispersal of traffic impacts over a wider area with no specific concentration of impacts. Strategic development would have good access to the strategic road network (A350), including Rawlings Green via a new railway crossing which also has good proximity to the railway station and employment areas to the north. (para 5.12.71).&lt;br&gt;&lt;br&gt;The SA Report considered that the decision as to which option to take forward in terms of sustainability effects is likely to hinge on the relative advantages and disadvantages of a dispersed versus non-dispersed approach. A non-dispersed approach was considered likely to concentrate impacts in one or two locations and these impacts will possibly be greater in terms of the environmental objectives. A dispersed approach could spread impacts over a wider area; these effects are less likely to be as significant against the environmental objectives but any cumulative effects of developing a number of sites will need to be considered. (para 5.12.75).</td>
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<td>4. Strategic employment site options assessment</td>
<td>The SA Report highlighted that previous sustainability appraisal work undertaken post Wiltshire 2026 had stated that development could conceivably take place in a number of different locations to maximise the strengths that each option offers, avoiding areas of particular environmental concern, including the River Avon corridor, Rowden Conservation Area and Birds Marsh Wood and reducing impacts concerning landscape and transport. (para 5.12.76)</td>
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<td>In addition to the three employment sites assessed in the SA Report in June 2011, the pre-submission SA assessed (paras 5.12.80 – 5.12.105) a further three sites:</td>
<td>The SA Report stated that development adjacent to the existing urban area was considered more sustainable than development that is divorced from the urban area as it is likely to be able to take advantage of existing services, facilities and infrastructure and be able to contribute more to regeneration of the town centre because of closer proximity. Proximity to existing public transport services and public transport interchanges in the town centre was also considered more likely to reduce the need to travel, facilitate a modal shift to sustainable transport modes thus improving air quality and congestion levels. (para 5.12.77)</td>
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<td>• Land near M4 Junction 17 (Sealy Farm)</td>
<td>4. Strategic employment site options assessment</td>
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<td>• Land off A350</td>
<td>The SA findings for the three additional sites are as follows:</td>
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<td>• Kington Park, Kington Langley</td>
<td>Land near M4 Junction 17 (Sealy Farm) (paras 5.12.89 - 5.12.95)</td>
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<td>There were considered to be no absolute environmental constraints to development in this location, subject to further ecological, landscape and archaeological assessment. Some likely significant adverse effects were noted in the assessment. A site of this size was considered likely to lead to the loss of a significant area of agricultural land, although none is of the higher value Grades</td>
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<td>and II, and the site does not have good access to local facilities, public transport links and key infrastructure within Chippenham. Significant benefits were considered likely in relation to proposals for waste recycling facilities in the northern section of this site adjacent to the motorway. <strong>Land off A350</strong> (paras 5.12.96 - 5.12.100) There were considered to be no absolute environmental constraints to development in this location, subject to further ecological, landscape and archaeological assessment. Significant adverse effects were considered most likely to relate to land and soil resources, air quality and environmental pollution and transport. Benefits considered likely to be significant related to economic development and employment provision. <strong>Kington Park, Kington Langley</strong> (paras 5.12.101 - 5.12.105) The extent of effects resulting from development at this site will depend on the location of any proposed development and what future uses are proposed. At the time of undertaking the assessment of Kington Park the proposed location of any new development was not known and this made it difficult to assess likely future effects. Kington Park has good access to the A350 and M4 but is approx 2.5-3km from Chippenham town centre. Any increase in traffic volumes, including additional lorry movements, associated with additional development will likely add to traffic pressures on the A350. There are considered to be few environmental constraints at this location.</td>
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**Democratic Process:**
17 January 2012 Cabinet - Covering report
(DEM/13) Wiltshire Council Cabinet - Pre-Submission Draft Wiltshire Core Strategy Development
Plan-making stage | Date | What was considered in the Core Strategy SA Report with regards Chippenham policies/sites? | SA Report findings and reasons for those findings | Link to SA Report and further Core Strategy evidence
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7 February 2012 Council - Covering report (DEM/27) Wiltshire Council - Pre-Submission Draft Wiltshire Core Strategy Development

| Wiltshire Core Strategy Submission SA Report | June 2012 | The SA Report provided a summary (Section 4) of previous Core Strategy SA work undertaken, including for those Core Strategy consultations listed above.  
1. Core Policy 9 Chippenham Central Area of Opportunity (Section 5.11)  
No amendments made to the assessment of this policy and options since Core Strategy pre-submission document.  
2. Core Policy 10 Spatial Strategy: Chippenham community area (paras 5.12.1 - 5.12.15)  
No amendments made to the assessment of this policy and options since Core Strategy pre-submission document.  
3. Strategic housing site options assessment (paras 5.12.16 - 5.12.79)  
One amendment was made to the assessment of the strategic housing options (paras 5.12.42 and 5.12.51) to make reference to consultation comments received from English Heritage at pre-submission regarding the Historic Landscape Assessment for the Wiltshire Core Strategy and the potential for archaeological constraints to development at Rawlings Green.  
4. Strategic employment site options assessment (paras 5.12.80 - 5.12.110)  
No amendments made to the assessment of the strategic employment site options since Core Strategy pre-submission document. However, a short section has been added (paras 5.12.108 - 5.12.110) to make it clear as to what site options the SA was recommending in sustainability terms. | | (SUS/11) Working towards a Core Strategy for Wiltshire - Sustainability Appraisal Strategic Environmental Assessment

1. Core Policy 9 Chippenham Central Area of Opportunity (Section 5.11)  
No amendments made to the assessment of this policy and options since Core Strategy pre-submission document.  
2. Core Policy 10 Spatial Strategy: Chippenham community area (paras 5.12.1 - 5.12.15)  
No amendments made to the assessment of this policy and options since Core Strategy pre-submission document.  
3. Strategic housing site options assessment  
The comments received from English Heritage, which were added (paras 5.12.42 and 5.12.51) as a reference to the assessment discussion did not affect the overall findings of the SA.  
4. Strategic employment site options assessment (paras 5.12.80 - 5.12.110)  
No amendments made to the assessment of the strategic employment site options since Core Strategy pre-submission document.  
The SA Report concluded (paras 5.12.108 - 5.12.110) that the two smaller sites (Hill Corner and Hunters Moon) were likely to lead to lesser environmental effects generally because of their...
Plan-making stage | Date | What was considered in the Core Strategy SA Report with regards Chippenham policies/sites? | SA Report findings and reasons for those findings | Link to SA Report and further Core Strategy evidence
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| | | size but also unlikely to give the benefits of the larger employment sites in terms of economic growth and employment. Of the larger proposed employment sites (Showell Farm, Sealy Farm and Land off A350), it was difficult to identify a site that was clearly more sustainable than others against the sustainability objectives and a more detailed assessment at site level would be required. All of the larger sites were considered relatively remote from Chippenham town centre and on Greenfield land, and significant impacts were considered likely relating to land and soil resources, air quality, climatic factors and transport.

Site option 4 (Sealy Farm) was not considered likely to have the same level of economic benefits for Chippenham town centre because of its location, making it unlikely to help meet Chippenham Vision objectives regarding town centre regeneration. However, proposals at this site for waste management facilities were considered likely to lead to significant benefits.

**Democratic Process:**
19 June 2012 Cabinet – Covering report (DEM/35) Wiltshire Council Cabinet - Submission of Wiltshire Core Strategy