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Dear Ms Clampitt-Dix

Chippenham Site Allocations Plan (CSAP) – Examination in Public

Thank you for the Council's responses to my Initial Appraisal. On the basis of your reply I am content for the examination to proceed to the hearing stage. However, as you will expect, there are matters relating to soundness which will require testing through that process. Now that you have my list of Matters and Issues to be examined at the hearings I invite the Council to provide brief responses to those matters, elaborating where necessary on the officers' responses to representations.

I will keep in mind that the Core Strategy (CS) has recently been adopted following a rigorous testing of soundness by a different Inspector. The CS identified a strategy for Chippenham based on delivering significant job growth and a requirement for mixed-use urban extensions, incorporating housing and identifying greenfield sites on the edge of town. So far as the CSAP is concerned, I have particularly noted that CS Core Policy 10 has stated that the allocations will accommodate approximately 26.5ha of land for employment and at least 2,625 new homes. I have further noted that the areas for growth and site allocations will be guided by 6 criteria set down in Core Policy 10, including the need for wider transport benefits for the existing community.

Your comments regarding the delivery of affordable housing are noted. However, questions remain and I will expect to pursue these during the hearings. For example, I remain concerned at the apparent variance in the Viability Assessment conclusions between para 7.1.3, which suggests 3 of the sites do not currently support a policy compliant level of affordable housing; para 7.1.7 which suggests only South West Chippenham is not expected to involve significant road infrastructure costs and is the most clearly viable; and para 7.1.8 which suggests the assessment of the sites demonstrates deliverability. The Plan indicates the particular importance of the need to establish that the levels of development proposed would provide the road infrastructure identified along with other necessary infrastructure and policy requirements (para 6.9). It may be that an appearance by a representative of BNP Paribas Real Estate at the appropriate hearing session (Matter 12) would be helpful in support of the Council's defence of its proposals.

It would also be helpful to have a statement to give the up-to-date situation regarding

the proposed developments at Hunters Moon and North Chippenham. Clearly these two sites will make a significant contribution to the provision of housing to meet the CS housing requirement. Both of these are noted as approved subject to signing of a S106 agreement (CSAP paras 4.5 & 4.6): presumably these will include the provision of affordable housing units and, in the case of North Chippenham, the provision of the first stage of the A350 to A4 link road.

The proposed change to include a new Policy CH5 for the Chippenham Eastern Link Road is noted. Whilst this does provide clarification, it is also necessary to amend the Proposals Map to illustrate the Policy in order to conform to Part 4, S9(c) of the Regulations. I am aware that there is evidence contained within Evidence Papers 3 and 4 to support the provision of a link road, and that the North Chippenham permission includes the first part of the road link. However, the former Highways Agency (Highways England) has now brought to my attention its continuing concerns regarding the impact of proposals on the wider highways network. From this, and other evidence before the Examination, this matter will require further discussion at the hearings and it may be that the Council will wish to introduce more evidence in support of its proposals. In this context the Council will be aware of my response to Highways England through the Programme Officer. A matter which does concern me is the ambiguous nature and character of the actual road proposal, particularly in respect of the central section through Rawlings Green, where the developers' intentions appear at variance with the overall scheme (rep 304).

I am acutely aware that the proposal for the strategic site at East Chippenham is controversial and will require full justification for soundness reasons. In this context there remain many questions to be answered and I have identified those where I consider answers will be necessary under Matter 9: an example is that whilst the policy requirement for the route of the ELR to provide a visual boundary to the town has been deleted, the intention remains within the Development Strategy (para 4.21). A further example is the potential confusion caused by the Council's response in respect of housing development north of the North Wiltshire Rivers Way - that a final masterplan may not promote development for housing north of the NWRW. This may well be a function of the use of indicative plans on an OS base map, but it provides policy plans which display a spurious accuracy and cannot be relied upon to give a true indication of the Plan's intent. These are examples only, but give an indication of my concerns. It may be useful for the Council and Chippenham 2020 LLP to provide the Examination with a statement of common or uncommon ground.

I have included as matters 2 – 5, a more detailed consideration of some aspects of the evidence base where I consider there remain questions to be answered, particularly in respect of the site selection procedure, and transport and flood risk evidence. I have also included a more detailed look at the Sustainability Appraisal where I consider there are significant questions to be answered: it may be that the Council will wish to invite a representative of Atkins to be available to join in the discussion and answer more specific questions. I also have doubts that the housing delivery trajectory reflects realistic rates of delivery for each of the strategic sites and will wish to explore this in more detail at the hearings.

In order to ensure the smooth progress of the Examination, the Council will no doubt keep in mind that any necessary main modifications are best introduced as soon as the need is identified.

Yours sincerely

Patrick T Whitehead (Inspector)