



## Chippenham Site Allocations Plan

# Proposed Modifications Consultation

# Summary of Responses

July 2016

## Wiltshire Council

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# Chippenham Site Allocations Plan Proposed Modifications Consultation : Summary of Responses

## 1. Introduction

- 1.1 The Inspector, whilst examining the soundness of the Chippenham Site Allocations Plan, concluded that the process of preparing the Plan was flawed. The Inspector set out perceived flaws in the methodology used to prepare policies of the Plan in a letter to the Council (Letter to the Council, 16<sup>th</sup> November 2015). A suspension of hearings has provided the Council with the opportunity to remedy those flaws with further work. This has been carried out in accordance with an enhanced methodology presented to the Inspector.
- 1.2 Further work has resulted in a set of proposed modifications to the Plan that were approved by the Council in May. These were supported by a set of new documents including a replacement for the previous Site Selection Report and further sustainability appraisal. Other documents presented new evidence. All the information that has been published is available on the Council's website at <http://www.wiltshire.gov.uk/planninganddevelopment/planningpolicy/chippenhamsiteallocationsplan.htm>
- 1.3 Representations on the proposed modifications were invited over the period from the 23<sup>rd</sup> May to 5<sup>th</sup> July 2016. Previously, at a meeting between Council officers and the Inspector on 21<sup>st</sup> January, the Council undertook to provide the Inspector with a summary of the consultation responses (letter from the Council to the Inspector 18<sup>th</sup> March 2016). This document represents that report. It highlights new issues that have been raised and officers have provided the Council's initial response.
- 1.4 It is anticipated that the Inspector will resume hearings into the soundness of the Plan in the Autumn 2016. All representations to the proposed modification have been forward to the Inspector for his consideration and will be considered alongside those already submitted.

## 2. Overview

- 2.1 184 separate comments on the Proposed Modifications to the Chippenham Site Allocations Plan (CSAP) have been received from 88 contributing consultees. Of these almost a quarter relate to Policy CH1 (South West Chippenham) and its supporting text while a further 30% are raising other more general comments. In relation to the predominant themes being discussed these are relating to highways and the overall strategy of the Plan. (Some comments related to more than one theme.)

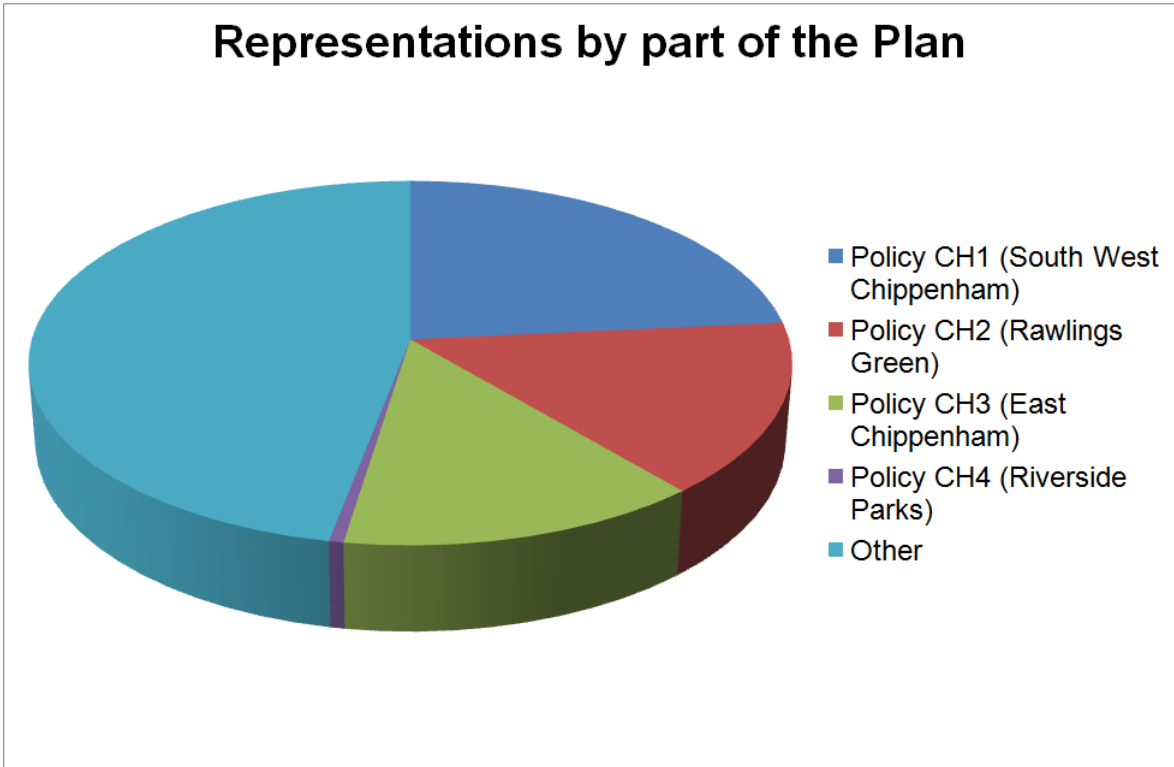


Figure 1: Representations by part of the Plan

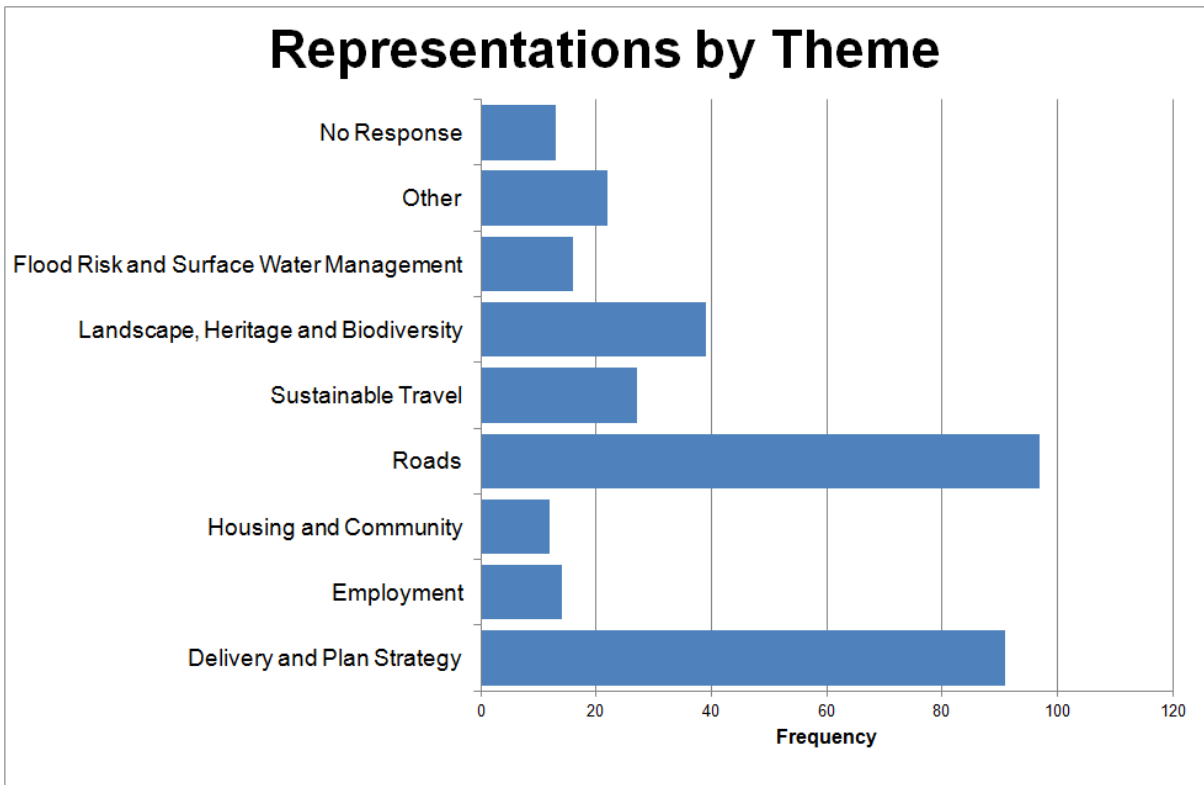


Figure 2: Representations by theme

### 3. Issues Raised in Consultation Responses

- 3.1 Set out below is a summary of the consultation responses to the CSAP Proposed Modifications consultation. The summary is provided to illustrate the distribution of comments, highlight the main issues being raised and provide a brief initial response from Wiltshire Council to new issues raised.
- 3.2 There are a number of issues raised that are already before the Inspector based on comments received in relation to the submitted plan. Initial officer comments are not therefore provided in relation to these issues. Instead, they concentrate on the new issues raised and identify where evidence is currently provided. These are not intended to be full, comprehensive responses to individual representations and provide the Council's initial response, as requested by the Inspector (note of 21 January 2016 meeting).
- 3.3 There are also a number of comments that raise very specific alternative wording to policy clauses or sentences in the Plan, for example the Environment Agency and Highways Agency. These are reported below but are not addressed directly. Instead officers will discuss with the individual respondents the merits of each suggestion and report to the Inspector the outcome of these discussions separately, for example through updated or new Statements of Common Ground.
- 3.4 This report is organised to follow the Chapter order of the Plan. A table records the number of comments received for each individual proposed modifications to each Chapter and lists the representation reference number (The 'Comment Id'). A second table records the range of issues raised listing all the comments for each modification accompanied by a very brief summary of the comments received. An overview of issues raised is provided with an outline of the Council's response to issues considered to be new.

#### Chapter 1: Introduction

#### Proposed Modifications: S1, S88

<i>Proposed Modification</i>	<i>Paragraph or plan reference</i>	<i>Number of representations</i>	<i>Comment Id</i>
S1	1.6	No comments	42
S88	1.10	1 comment	

#### *Proposed modification S88*

<i>Comment Id</i>	<i>Name</i>	<i>Summary of Comment</i>
42	Gleeson	Support removal of East Chippenham

## Chapter 2: Context

### Proposed Modifications: S2-S4, S92

<i>Proposed Modification</i>	<i>Paragraph or Plan reference</i>	<i>Number of representations</i>	<i>Comment Id</i>
S2	2.6	No comments	11, 12,16, 21, 27, 41, 79
S3	Strategy Box	No comments	
S4	2.3	7 comments	
S92	2.26.	No comments	

#### *Proposed modification S4*

<i>Comment Id</i>	<i>Name</i>	<i>Summary of Comment</i>
11	Mr Eades	West of A350
12	Mr Ham	West of A350
16	Mrs Barrow	West of A350
21	Mr Phillips	West of A350
27	Mr Toogood	Inaccuracies in list of proposed modifications, west of A350
41	Chippenham Without PC	West of A350
79	Mrs Knowland	West of A350

3.5 Issues raised in these representations include:

- Inaccuracies in the list of proposed modifications
- The need for greater protection against development to the west of the A350

#### **Issue 1 Inaccuracies in the list of proposed modifications**

3.6 Representations have correctly identified a referencing error in relation to Proposed Modification S4. The change is to paragraph 2.15 on page 10 of the submitted Plan and not paragraph 2.3 as set out in proposed modification schedule. This should be corrected.

#### **Issue 2 Development west of the A350**

3.7 Originally, a number of representors expressed concern about the inclusion of the proviso “*unless other options are exhausted*” in the reference to the A350 forming a clear and logical boundary in paragraph 2.15 of the Plan. This section of the Plan is reporting on the content of the Wiltshire Core Strategy which states that “*broad ‘strategic areas for growth are indicated by barriers such as main roads, rivers and the main railway line. The A350 may be considered as one such barrier to development.’*” (CWCS /01)

3.8 Briefing Note 2: Definition of Strategic Areas (CEPS/13) explains why the Council considered that the A350 provided a clear and logical boundary to the town to the west for the purpose of the CSAP. Land to the west of the A350 is already protected by being outside the Limits of Development for Chippenham. However, there are adopted policies within the Wiltshire Core Strategy which would allow development in this

location, for example an affordable housing exceptions policy. The CSAP should be in conformity with the WCS. Therefore to imply a blanket protection from development would not be in conformity with this higher tier policy document. The proposed modification reflects this position.

### Chapter 3: Vision and Objectives

#### Proposed Modifications: S5-S8, S89, S93-S95

<i>Proposed Modification</i>	<i>Paragraph or plan reference</i>	<i>Number of representations</i>	<i>Comment Id</i>
S5	3.6	1	162
S89	3.2	1	139
S93	3.5	No comments	
S5	3.6	1	30
S6	3.7	1	47
S7	3.8	2	82, 161
S94	3.1	No comments	
S8	3.11	No comments	
S95	3.12	No comments	

#### *Proposed modification S5*

<i>Comment Id</i>	<i>Name</i>	<i>Summary of Comment</i>
162	Anne Henshaw CPRE	Paragraph unclear

#### *Proposed modification S89*

<i>Comment Id</i>	<i>Name</i>	<i>Summary of Comment</i>
139	Crest and Redcliffe	South West Chippenham site supports the vision for Chippenham

#### *Proposed modification S89*

<i>Comment Id</i>	<i>Name</i>	<i>Summary of Comment</i>
30	Mrs Spickernell	Sustainable transport to J17, age of traffic modelling, public transport and pedestrian connectivity, supports dropping the ELR and East Chippenham

#### *Proposed modification S6*

<i>Comment Id</i>	<i>Name</i>	<i>Summary of Comment</i>
47	Louisa Haines	Paragraph sound, objective for 2 form entry primary schools not met at Pewsham

### Proposed modification S7

<i>Comment Id</i>	<i>Name</i>	<i>Summary of Comment</i>
82	Stagecoach	Support
161	Anne Henshaw CPRE	Sentence is unclear

3.9 The main issues raised in these representations include:

- The plans approach to public transport and pedestrian connectivity
- Policy for primary schools
- Currency of the Chippenham Transport Model
- Support for South West Chippenham
- Support for the deletion of the East Chippenham allocation and the ELR

### **Issue 3 Sustainable transport**

3.10 Access to and support for public transport and pedestrian connectivity has been a consideration when developing a preferred strategy for Chippenham. Core Policy 10 of the Wiltshire Core Strategy specifically requires the CSAP to consider:

- improvements to accessibility by alternatives to the private car to the town centre, railway station, schools and colleges and employment, and
- improved access to and enjoyment of the countryside.

3.11 Transport and Accessibility evidence (CSAP/04, 04a, 05, 05a) has included access to public transport and pedestrian connectivity as part of Key Theme 1 : Sustainable Access within each assessment. For example, in relation to each strategic area and strategic sites, walking distance to existing public transport corridors is considered to understand both the area or sites potential to increase the use of public transport and the area or sites potential to support improved public transport services. Walking distances to schools, the town centre and community hospital are other factors taken into consideration.

3.12 Sustainability Appraisal objective 10 seeks to 'reduce the need to travel and promote more sustainable transport choices'. This is supported by two decision aiding questions 'Occur in an area currently accessible by public transport/ walking and cycling? If not, is there scope to make it so?' and 'Support improvements to public transport connectivity and pedestrian and cycle links to the town, town centre, railway station and Wiltshire College campuses in Chippenham? '. Accessibility to and support for public transport has therefore been a consideration throughout the Plan's development.

3.13 Sustainable transport improvements are a component of the Chippenham Transport Strategy, 2015 (CTAN/08) and will remain a component of the strategy once it has been refreshed to relate to the Proposed Modifications to the Plan.



#### **Issue 4 Objective for 2 form entry schools**

3.14 The Education Authority’s commitment to seeking to provide for larger primary schools where achievable (e.g. 2 forms of entry or 420 places) is explained in the Education addendum to Evidence Paper 2: Housing and Community Facilities (CEPS/03). The proposed policies of the Plan seek to support this objective by requiring land for a 2 form entry primary school at both South West Chippenham and Rawlings Green. Proposed Modification S6 reflects this position. The Education Authority working in partnership with existing schools will seek to extend this objective to existing schools across Wiltshire.

#### **Issue 5 Currency of the Chippenham Transport Model**

3.15 Transport Briefing Note 3: Suitability of the Chippenham S-Paramics Transport Model (CTAN/06) was prepared in response to concerns raised regarding the length of time since the last extensive data collection programme was undertaken across the Chippenham highway network. This Transport Briefing Note sets out the reasons why the Chippenham Transport Model, in its current form, is considered to be a suitable and proportionate tool for the high level option testing that has been undertaken during transport evidence preparation.

### **Chapter 4: Development Strategy**

#### **Proposed Modifications: S9- S17, S90**

<b>Proposed Modification</b>	<b>Paragraph or plan reference</b>	<b>Number of representations</b>	<b>Comment Id</b>
S9	4.3	No comments	
S10	4.4	1	160
S11	4.5	1	48
S12	4.6	1	75
S13	Table 4.1	No comments	
S14	Table 4.2	No comments	
S90	4.8	No comments	
S15	4.10-4.24	25	8, 15, 28, 29, 39, 57, 60, 70, 71, 74, 85, 97, 106, 110, 111, 114, 116, 125, 126, 127, 138, 148, 159, 168, 172
S17	Figure 4.1	2	48, 157

#### *Proposed modifications S10*

<i>Comment Id</i>	<i>Name</i>	<i>Summary of Comment</i>
160	Anne Henshaw CPRE	Statement has no way of being enforced. Needs re-wording.

*Proposed modifications S11, S17*

<i>Comment Id</i>	<i>Name</i>	<i>Summary of Comment</i>
48	L Haines	Pewsham a good location for growth, support bus services, close to Abbeyfield school, support better primary school
157	Hallam Land Management	Option E6 should not have been rejected. Support deletion of land in Area C.

*Proposed modification S12*

<i>Comment Id</i>	<i>Name</i>	<i>Summary of Comment</i>
75	Stagecoach	Support Rowden Park, bus priority needed, loss of ELR, capitalise on existing bus routes, deliverability of Rawlings Green, support Cocklebury Link to improve congestion in town centre

*Proposed modification S15*

<i>Comment Id</i>	<i>Name</i>	<i>Summary of Comment</i>
8	Mr Myers	Land to west of A350 should be considered
15	Mr Bishop	Clarity in correspondence
28	Mr Toogood	Strengthen plan against unsuitable development
29	Mr Toogood	Up-to-date, correct air quality data
39	P Tennant	Remove all references to an ELR. Support for CAUSE15
57	H Stuckey	Link roads are by-passes, Southern Link Road (SLR) performs best at reducing peak hour flows, free-standing SLR is preferred
60	Ms Greaves	Impact on A350
70	Strategic Land Partnerships	Not enough land for housing, relies on strategic sites, should identify smaller sites within the settlement boundary, need for greater choice and certainty, allocate Saltersford Lane
71	CAUSE2015	As per 57
74	Stagecoach	Endorses conclusions that proposals will support bus services, critical mass needed, support Barrow Farm
85	P Ranson	As per 57
97	Langley Burrell PC	Support South West Chippenham allocation, loss of agricultural land at Rawlings Green, Areas D and E better places for growth, delivery of Cocklebury Link Road, object to Barrow Farm, support development on brownfield land
106	N Hartnell	As per 57
110	C Caswill	As per 57
111	Greensquare	Reinstate submitted strategy

<i>Comment Id</i>	<i>Name</i>	<i>Summary of Comment</i>
114	HD Town Planning	Barrow Farm, inconsistencies and inaccuracies in evidence, use latest evidence in application, flawed assessment process, withdraw the Plan
116	T Molley	ELR v SLR
125	L Ranson	ELR v SLR
126, 127, 156, 159	Anne Henshaw, CPRE	The south west sites cannot show any alternatives to the car, in order to reach the main urban area. Definite proposals are essential. Proposal needs an explanation of risks
138	P Moss	As per 57
148	N Leatherhead	As per 57
168	L Ranson	As per 57
172	N Murry	No justification for assuming that an Eastern Link Road (ELR) will necessarily be part of a long term strategy for Chippenham

### 3.16 Issues raised in these representations include:

- The submitted strategy should remain the preferred strategy. The submitted strategy optimises the provision of market and affordable housing and employment land and it provides greater choice and certainty.
- The preferred strategy should recognise the role of brownfield development
- The preferred strategy should focus on land in Areas D and E.
- South west sites cannot show any alternatives to the car, in order to reach the main urban area (See issue 3 above)
- The proposed modifications rely on very large strategic sites which provide limited choice, flexibility and resilience. The Plan should, include smaller appropriate sites within the settlement boundary such as Slatersford Lane.
- Support for development in Area E (South West Chippenham, CH1)
- Support for Barrow Farm (in Area A)
- Link roads act as by-passes. In this context an SLR performs better than an ELR and should be built independently of development
- The need for better and up-to-date air quality monitoring data and a better understanding of the impact of development on air quality in Chippenham
- Concerns about the impact of new development on the A350
- The need for a more explicit focus on public transport measures
- Site option A1 (Barrow Farm) has not been properly tested and the assessment is based on inconsistencies and inaccuracies in evidence
- Land to the west of the A350 could be an optimum location for development and has not been properly considered.

The issue relating to development to the west of the A350 has been discussed above in relation to Issue 2, sustainable transport has been discussed as Issue 3, above

## **Issue 6 The preferred plan strategy**

- 3.17 The Site Selection Report: Enhanced Methodology (CSAP/12) explains the process and justification for proposing the mixed strategy as the preferred strategy in Chippenham. It was a difficult choice given the range and variety of locations promoted at Chippenham.
- 3.18 The Mixed Strategy has the benefit of:
- early delivery of employment land (that is attractive to business) and housing land;
  - delivery of housing during the Plan period at a level more closely aligned with the residual requirement;
  - delivery of the Cocklebury Link Road linking the east of the town to the A350 via permitted development at North Chippenham mitigating the adverse impacts of growth on the local roads;
  - Improving sustainable access via an enhanced river corridor providing links to the town and countryside along the River Avon consistent with the Chippenham Vision.
- 3.19 The more ambitious strategies which promote levels of growth significantly higher than the Wiltshire Core Strategy residual housing requirement (for example the Submitted Plan and Southern Link Road strategy) have greater risk of delivery thus less certainty and result in higher levels of development beyond the Plan period. A strategy which focuses on the delivery of the Eastern Link Road is dependent on delivery of infrastructure and therefore compromises early delivery of employment land (attractive to businesses) and housing.
- 3.20 In relation to the role of windfall sites as an approach to reducing the need for an allocation at Rawlings Green, the Site Selection Report (paragraphs 12-24) explains the unpredictability of windfall, as a source of supply, and the limited contributions that have been made to housing land supply in Chippenham from this source. The Mixed Strategy provides certainty and choice whilst respecting the 'at least' 4510 homes at Chippenham by 2026
- 3.21 There was a fundamental judgement to be made, based on the available evidence, which would lead to a strategy that delivers the homes and jobs needed now (at least a further 1780 homes by 2026 and 21.5 hectares of employment land) without prejudicing the longer term development needs at Chippenham. The Council has concluded the strategy included within the Proposed Modifications delivers that growth in the most sustainable way.

## **Issue 7 Brownfield development**

- 3.22 The Site Selection Report (paragraphs 12-24) explain the unpredictability of this source of supply and the limited contributions that have been made to housing land supply in Chippenham from this source.
- 3.23 The Plan recognises that some housing needs will be met by brownfield, windfall opportunities within the town and makes an allowance through the commitments

informing the housing land supply position, which include the policy commitment for 250 homes at Langley Park.

- 3.24 While sites such as Middlefield and the Old Police Station may deliver additional homes there is no certainty at this stage of how many homes might come forward and by when, particularly when there may be alternative and competing land uses.
- 3.25 The Core Strategy refers to the limited opportunities for the redevelopment of brownfield sites in Chippenham. The historical rate of delivery on unallocated small brownfield sites is also not significant. The Council considers that an additional allowance for brownfield land over and above land already committed is not justified in this plan due to a lack of certainty over its quantum, unpredictability as to if and when it might happen and the town's own track record of limited small scale housing projects. Instead, the 'at least' figure at Chippenham provides the flexibility for housing on brownfield sites to be delivered alongside allocated strategic sites.
- 3.26 A reliance on brownfield sites to deliver the housing requirements of the Plan may leave the town vulnerable to speculative development if the low level of historical delivery continued.

#### **Issue 8 SLR performs better than an ELR**

- 3.27 Neither an eastern or southern link road are proposals of the Plan although the Plan does seek to safeguard their future delivery.
- 3.28 The relative potential for either a southern link road or eastern link road has been tested as part of the evidence base. The conclusions are included in Transport and Accessibility Evidence Paper Part 1 (CEPS/04) and Part 2a (CEPS/05a). It is discussed further in Position Statement on Network Resilience at Chippenham (CTAN/12). Specific issues were identified in relation to the performance of a Southern Link Road at its junction with the A350 and in relation to the geographic extent of delays across the town during peak periods.
- 3.29 Policies for both South West Chippenham (Policy CH1) and Rawlings Green (Policy CH2) include a requirement that the design and layout of development must not prohibit a potential future road connection to land across the river to the south-east (In the case of Rawlings Green, this is proposed modification S37).

#### **Issue 9 Air quality**

- 3.30 Wiltshire Council does have a clear understanding of and policy approach to air quality in Chippenham. There are no Air Quality Management Areas designated at Chippenham.
- 3.31 Wiltshire Core Strategy Core Policy 55 (CWCO/01) already requires all development, which because of its size, nature or location will have the potential to exacerbate known areas of poor air quality, to overcome this barrier to development by

demonstrating the measures they will take to help mitigate air quality impacts. This policy will apply to all applications arising from the proposed allocations.

- 3.32 The Sustainability Appraisal includes air quality as an objective within the assessment criteria. Objective 4 is to 'improve air quality throughout Wiltshire and minimise all sources of environmental pollution' (CSUS/12). The consideration of air quality has, therefore informed the assessment of strategic areas, individual strategic sites and the development strategy options.
- 3.33 The Chippenham Transport Strategy, 2015 (CTRAN/08) recognises the potential Increase in issues associated with air quality, noise and light as a result of planned development as an issue to be considered and addressed as part of the strategy. The consequences of development on air quality are considered at each stage of strategy development. The Chippenham Transport Strategy will be refreshed once more to reflect the proposed changes to the Plan included in the Proposed Modifications. The issue of air quality will continue to be part of the strategy.
- 3.34 Addendum to Evidence Paper 2: Housing and Community Facilities: Planning for Air Quality in Chippenham (CEPS/02a) was published alongside the Proposed Modifications to place on record Wiltshire Councils current understanding of air quality in Chippenham. There are no designated Air Quality Management Areas in Chippenham. Air quality in Chippenham is monitored using nitrogen dioxide diffusion tubes. The location of these is reviewed annually as it is the annual mean objective for nitrogen dioxide that is of primary concern both within Wiltshire and the UK more generally. Initial results in 2012 indicated an elevated level in the vicinity of the Bridge Centre. As a consequence survey locations at the Bridge Centre were reviewed and have been monitored since 2012. The data is included in the Air Quality Addendum up to 2015. Monitoring is continuing.
- 3.35 As the addendum indicates a monitoring location has recently been established close to the A350 on Malmesbury Road following concerns being raised about levels in this locality. Monitoring is continuing but there is currently no exceedence of air quality standards.

## Chapter 5: Site Allocations – South West Chippenham (Policy CH1)

### Proposed Modifications: S18 – S30, S62

<i>Proposed Modification</i>	<i>Paragraph or plan reference</i>	<i>Number of representations</i>	<i>Comment Id</i>
S18	Policy CH1	41	1, 2, 4, 26, 31,34, 40, 43, 44, 48, 50, 51, 59, 61, 62, 65, 86, 88, 92, 93, 94, 95, 96, 113, 115,117, 118, 119, 129, 130, 132, 133, 137, 139, 140, 151, 152, 155, 158, 174,163, 165,
S20	Figure 5.1	1	164
S21	5.1, 5.1a, 5.1b	4	64,153, 154, 165

<i>Proposed Modification</i>	<i>Paragraph or plan reference</i>	<i>Number of representations</i>	<i>Comment Id</i>
S22	5.2	No Comments	
S23	5.3	No Comments	
None	5.4	1	119
S24	5.5	1	134
S25	5.6	1	113
S26	5.7	2	120, 76
S27	5.5	No Comments	
S28	5.9	2	121
S29	5.8	No Comments	
S30	5.10	1	9
S62	CH1	1	144

**3.36** Following the close of the consultation on 5 July 2016 a petition was received on 12 July 2016 from residents of Lacock and Reybridge. This petition has been added to the document library as CCON/17. 39 individuals signed the petition and propose that the plan is unsound on the same grounds as those submitted in Comment Id 94 in relation to proposed modification S18.

*Proposed modification S18*

<i>Comment Id</i>	<i>Name</i>	<i>Summary of Comment</i>
1	Fisher German LLP	Redundant Pipelines may be affected.
2	CLH Pipeline Systems Ltd	The CLH Pipeline System may be affected
4	Phillip Glen	Incorporate a cycle way and walkway into town.
26	John Scragg	Increase in housing will place additional burdens on the conservation of the area's character and existing roads. Area is the furthest location from the secondary schools.
31	Chris Sykes	Langley Park has not been taken into account. Traffic impact at peak times is understated, including through Lacock. Smaller Extension sites don't include foot and cycle access from Lackham to the development alongside the B4528.
34	Chippenham Town Council	The additional houses will have an impact on the road network and local service provision, lack of public transport provision will place an additional strain on the area.
40	Peter and Jane Fennell	Objects: expansion into rural area, high grade agricultural land, impact on Lackham House, flood risk, poor foot and cycle links
43	Chippenham 2020	Insufficient weight has been given to cultural heritage matters.
44	Gleesons	Decision to enlarge the allocation unsound. Allocate Land at Forest Farm instead of smaller sites extensions.

<i>Comment Id</i>	<i>Name</i>	<i>Summary of Comment</i>
48	Louisa Haines	Sites proposed does not allow Pewsham to be in accordance with CP10 requirements 3 &4.
50	Lacock Parish Council	Additional housing and land is unjustified. Alternative site at Langley Park available. Fails to provide sufficient new highway infrastructure and take account of increased traffic flows on the wider road network e.g Lacock
51	Richard Hames, Tytheron Lucas Residents Association	Supports the increase of houses. Insufficient account has been taken of a number of small building sites and brownfield sites. Southern Link Road has not been looked at correctly.
59	J Heseldon	Objects. Evidence of flooding, Radon gas emitting soil and high levels of carcinogenic and Toxic chemicals
61	Showell Protection Group	Objects to the additional homes and land identified. Incorrect traffic modelling.
62	Jenny Marshall	Objects Incorrect traffic modelling. Alternative site at Langley Park available.
65	Sandra Hames	Supports the increase of houses. Insufficient account has been taken of a number of small building sites and brownfield sites. Southern Link Road has not been looked at correctly.
82	National Trust	Object to additional housing land: Visual impact, traffic, flood risk and water quality
86	Joanna White	Incorrect traffic modelling. Southern Link road required.
88	Peter & Anne-Marie Hickman	Objects Will increase flooding. Incorrect traffic modelling.
92	Nancy Robertson	Unsound. Increase in traffic.
93	Susan Fothergill	Unsound. Object to the scale of the development which is too near Lackham and Lacock. Incorrect traffic modelling and having regard to impact upon Lacock.
94	Helen Stride	Object Incorrect traffic modelling and having regard to impact upon Lacock. Allocate only the Rowden Park site.
95	Mike Green	Proposals are unsound. Incorrect traffic modelling and having regard to impact upon Lacock. Allocate only the Rowden Park site.
96	Tony Rolls	Incorrect traffic modelling
113,115,117, 118, 129, 130,132, 137, 139, 140	Crest and Redcliffe Homes	Support identification of Rowden Park in Policy CH1 to provide 1000 homes, 18ha employment, local centre. Support identification of three smaller extensions to provide up to 400 homes. Support for primary provision plan statements Some outstanding objections



<i>Comment Id</i>	<i>Name</i>	<i>Summary of Comment</i>
151, 152,	Taylor Wimpey	Support identification of Showell Nurseries. Objections to current wording on the basis of deliverability
155, 163	Hallam Land Management	Allocate land south of Showell Nurseries. Option E6 should not have been rejected. Support deletion of land in Area C
158	Anne Henshaw, CPRE	Incorrect traffic modelling and requirements.
174	Hollins Land	Support the inclusion of land at Patterdown Farm as a 'Smaller Extension Site'.

*Proposed modification S20*

<i>Comment Id</i>	<i>Name</i>	<i>Summary of Comment</i>
164	Hallam Land Management	Option E6 should not have been rejected. Support deletion of land in Area C

*Proposed modification S21*

<i>Comment Id</i>	<i>Name</i>	<i>Summary of Comment</i>
64	Strategic Land Partnerships	Propose additional extension (2.4ha) to land allocated under Policy CH1
153	Taylor Wimpey	Support identification of Showell Nurseries. Object to the current wording on the basis of deliverability. Clarity of implied phasing needed.
154	Anne Henshaw, CPRE	Incorrect traffic modelling and requirements.
165	Hallam Land	Reasonable alternatives haven't been assessed correctly. Allocate Land East of Showell Farm instead of smaller extension sites.

*Proposed modification S24*

<i>Comment Id</i>	<i>Name</i>	<i>Summary of Comment</i>
134	Crest and Redcliffe Homes	Heritage assessment has been submitted as part of planning applications for site.

*Proposed modification S25*

<i>Comment Id</i>	<i>Name</i>	<i>Summary of Comment</i>
113	Crest and Redcliffe Homes	Objects to requirement for 2FE primary school and how it would be provided.

*Proposed modification S26*

<i>Comment Id</i>	<i>Name</i>	<i>Summary of Comment</i>
76	Stagecoach West	Modification is sound. Supports the widest range of sustainable transport choices. Supports the modification proposing links between CH1 and Methuen Park.
120	Crest and Redcliffe Homes	The 'Rowden Mile' and a riverside walk have been identified as part of the planning application.

*Proposed modification S28*

<i>Comment Id</i>	<i>Name</i>	<i>Summary of Comment</i>
121	Crest and Redcliffe Homes	Reference to northwestern part of the site around Patterdown being left undeveloped and incorporated into green space, is unjustified and incorrect.

*Proposed modification S30*

<i>Comment Id</i>	<i>Name</i>	<i>Summary of Comment</i>
9	Environment Agency	Reorder sentences in Paragraph 5.10 to ensure different issues are not mixed up and to make it clearer to the reader.

*Proposed modification S62 (Superseded)*

<i>Comment Id</i>	<i>Name</i>	<i>Summary of Comment</i>
144	Anne Henshaw CPRE	Detailed proposals for cycle and pedestrian links are necessary

3.37 Issues raised in these representations include:

- Support for development at South West Chippenham (CH1) including Rowden Park, and two of the smaller extension sites (Land at Patterdown and Land at Showell Nurseries)
- Additional housing and land at South West Chippenham is unjustified. Return to 1000 homes only on Rowden Park.
- Take account of the proposed 350-400 new houses at Langley Park which would reduce the number of houses required at South West Chippenham to 1000. Reduce the area to that proposed previously.
- The Mixed Strategy fails to provide sufficient new highway infrastructure to deal with the proposed new developments in the CSAP and to take account of the implications of increased traffic flows on the wider road network including Lacock.
- Lack of consideration of sustainable transport links between south of site and Chippenham. Planning application for Showell Farm includes a roundabout off A350. This should be included in the proposals.
- Southern Link Road hasn't been considered properly.

- 5 year land supply - Deliverable sites ( e.g. Showell Nursery) should be brought forward at the earliest opportunity to reduce the possibility of the needs of Chippenham being met elsewhere.
- Site Selection Process – Options/Alternative Sites have not been subject to robust evaluation. E.g. Option E6(includes Land East of Showell Farm)
- Land East of Showell Farm should be identified as an alternative to the three Smaller Extension sites.
- Forest Farm should be identified instead of South West Chippenham.
- A Transport Strategy should not be excluded from the Rowden Park Site masterplan.
- The order of the wording in paragraph 5.10 regarding flooding, groundwater protection should be changed around to ensure different issues are not mixed up and to make it clearer to the reader.

3.38 Specific comments about Policy CH1 wording and criteria include:

- Clarification is required as to how the additional 2FE primary school will be provided.
- Objection to Cocklebury Road Link being provided before 800 homes are completed.
- Statement requiring northwestern part of the site around Patterdown to be left undeveloped and incorporated into greenspace is incorrect and unjustified.
- Expand Paragraph 5.2 to include reference to “direct and easy access to the A350 and M4...”
- Delete from Paragraph 5.4 sentence “To help limit traffic impacts, housing development will commence adjacent to the B4528 between Showell Farm and Milbourne Farm...”
- Amend the scale of the Riverside Park to 78ha
- Unclear whether CH1 permits development at the small extension sites to be brought forward in isolation to the main Rowden Park site. Needs to be clear that that there are no restraints in bringing forward development on the latter at the earliest opportunity.

3.39 The preferred plan strategy (Issue 6), sustainable transport (Issue 3), the preference for a southern link road compared to an eastern link road (Issue 8) and the role of brownfield sites (Issue 7) have already been discussed above.

## **Issue 10      Langley Park**

3.40 There is a current planning application for Langley Park (16/03515/OUT) which proposes 400 homes as part of a mixed use development. The planning application has yet to be determined by the Council. The Plan makes an allowance using the policy commitment for 250 homes. The Council considers that an additional allowance for brownfield land over and above land already committed is not justified in this plan due to a lack of certainty over its quantum and unpredictability as to if and when it might happen. Instead, the ‘at least’ figure at Chippenham provides the flexibility for housing on brownfield sites to be delivered alongside allocated strategic sites.

## **Issue 11      Impact upon Lacock**

- 3.41 The Chippenham Transport Strategy highway network covers the Chippenham Urban Area including the A350 (CTRAN/03 Section 4). Transport Briefing Note 4 (CTRAN/07) explains how Strategic Transport Modelling works. The modelled area has been divided into zones, representing the start and end locations for trips, with new developments represented by separate zones (CTRAN/07 Figure 2). External zones are used for trips that start or end outside Chippenham allowing the portion of these trips that pass through Chippenham to be represented. Ten external zones exist, one of which is “A350, at Lacock, south of Chippenham” (CTRAN/07 Figure 1).
- 3.42 Each Alternative Development Strategy has been assessed in a ‘without wider highway improvements’ and a ‘with wider highway improvements’ scenario. The ‘without wider highway improvements’ scenarios provide suitable highway access arrangements to connect Strategic Site Options to the nearest existing roads. The ‘with wider highway improvements’ scenarios incorporate additional highway infrastructure improvements to attempt to deal with the wider traffic impacts of Strategic Site Option development (Supplement to Evidence Paper 3 Transport and Accessibility Part 2a: Assessment of Alternative development Strategies (CEPS/05a). The Refresh of the Chippenham Strategy will add a range of further more detailed mitigation measures for local traffic impacts and measures to support more sustainable means of travel. There is therefore an understanding of the impact of the proposals on the immediate and wider network.

### **Chapter 5: Site Allocations – Rawlings Green (Policy CH2)**

#### **Proposed Modifications: S31 – S44**

<i>Proposed Modification</i>	<i>Paragraph or plan reference</i>	<i>Number of representations</i>	<i>Comment Id</i>
31	Figure 5.2	No comments	
32	Policy CH2	22	81, 53, 68, 102, 38, 56, 69, 84, 91, 100, 105, 108, 124, 136, 18, 142, 147, 5, 54, 97, 167, 170
33	Policy CH2	No comments	
34	Policy CH2	4	78, 3, 35, 90, 80, 184
35	Policy CH2	No comments	
36	Policy CH2	2	19,46
37	Policy CH2	3	20, 24, 150
38	5.11	No comments	
39	5.12	No comments	
40	5.16	No comments	
41	5.16	No comments	
42	5.17	No comments	
43	5.18	12	89, 103, 57, 85, 106, 110, 116, 125, 71, 109, 138, 148
44	5.18	1	149

Proposed modification S32

<i>Comment Id</i>	<i>Name</i>	<i>Summary of Comments</i>
81	Wavin	Lack of justification for strategic role of Cocklebury Link Road (CLR), detrimental impact on operations, delivery involves Wavin land
53	Tyherton Lucas Residents Assoc	Traffic evidence is flawed, risk in whether the rail bridge will be built
68	S Hames	Traffic evidence is flawed, risk in whether the rail bridge will be built
102	C Ranson	Development not needed, adverse landscape impacts, rail bridge too costly, no clear design
38	P Tennant	Allocation not needed to meet residual housing requirement
56	H Stuckey	Development not needed, adverse landscape impacts, rail bridge too costly, no clear design, dependent on Northern Link Road (NLR), need for CLR not proven
69	CAUSE2015	Development not needed, adverse landscape impacts, rail bridge too costly, no clear design, dependent on NLR, need for CLR not proven
84	P Ranson	Development not needed, adverse landscape impacts, rail bridge too costly, no clear design
91	T Church	Development not needed, adverse landscape impacts, rail bridge too costly, no presumption in favour of ELR
100	T Molloy	Adverse landscape impact, development not needed, rail bridge too costly, poor location encourages out-commuting
105	N Hartnell	Development not needed, adverse landscape impacts, rail bridge too costly, dependent on NLR,
108	C Caswill	Development not needed, rail bridge too costly, delayed delivery because of rail bridge, dependent on NLR, need for CLR not proven, impact on J17, air quality and road safety on Station Hill compromised
124	L Ranson	Development not needed, adverse landscape impacts, rail bridge too costly, no clear design
136	P Moss	Justification for CH2 less without ELR, rail bridge too costly, traffic modelling out of date, site selection driven by road benefits
18	N Murry	CH2 unjustifiable without Area C development (bridge cost), traffic modelling out of date and underestimates impacts, rail bridge deliverability, underestimates impacts on villages
142	K Stuckey	Dependence on NLR, impact on B4069, CLR before CH2

<i>Comment Id</i>	<i>Name</i>	<i>Summary of Comments</i>
147	N Leatherland	Development not needed, adverse landscape impacts, rail bridge too costly, no clear design, dependent on NLR, need for CLR not proven
5	P Bishop	CLR should be a pre-requisite for development of CH2
54	S Hartnell	Not required because of brownfield. Landscape impact cannot be mitigated. Unviable with 40% dwellings - bridge costs under-estimated. Dependent upon N Chippenham NDR.
97	Langley Burrell PC	Sites in Area D and E should be favoured. CH2 issues with ownership at bridge, impact before link to A350, cumulative impact with Wavin and N Chippenham is unacceptable
162	L Ranson	Development not needed, adverse landscape impacts, rail bridge too costly, no clear design, dependent on NLR, need for CLR not proven
170	N Murry	Development not needed, adverse landscape impacts, rail bridge too costly, dependent on NLR, issues and impact for CLR not understood

*Proposed modification S34*

<i>Comment Id</i>	<i>Name</i>	<i>Summary of Comments</i>
78	Stagecoach West	Additional traffic congestion is unacceptable
3	Kington Langley PC	Interim impact on B4069 is unacceptable
35	Chippenham TC	Recognise uncertainty of rail bridge and reliance on developer
90	J Harris	Impact on B4069 and villages, rail bridge too costly, safety of access
80	I James	Impact on B4069 and villages, rail bridge too costly, safety of access
184	Bremhill PC	Impact on B4069 and villages, rail bridge too costly, safety of access

*Proposed modification S36*

<i>Comment Id</i>	<i>Name</i>	<i>Summary Comments</i>
19	N Murry	Loss of countryside, development not needed
46	Gleeson developments	Evidence is flawed, judgements are inconsistent and/or unsupported by evidence. Proposals and rejection of

		strategic site option D7 are each not justified.
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*Proposed modification S37*

<i>Comment Id</i>	<i>Name</i>	<i>Summary of Comments</i>
20	N Murry	ELR v SLR, need for a transport strategy ahead of development
24	J Scragg	Traffic assessment has anomalies and impacts not properly understood
150	A Henshaw	Remove preference for eastern area

*Proposed modification S43*

<i>Comment Id</i>	<i>Name</i>	<i>Summary of Comments</i>
89	S Hartnell	Remove ELR
103	C Ranson	Remove ELR
109	C Caswill	Remove ELR reference

*Proposed modification S44*

<i>Comment Id</i>	<i>Name</i>	<i>Summary of Comments</i>
149	A Henshaw	Clarification on short term impacts of CLR, duration and certainty of delivery

Issues raised in these representations include:

- Traffic evidence miscalculates the effects of the Cocklebury Link Road (CLR) as data is out of date
- Co-ordination of CLR delivery; should be provided entirely before development commences, may not be delivered at all, relies on development at N Chippenham and will lead to increased traffic on the unsuited B4069
- The costs of a rail bridge have been under-estimated, land ownership issues will delay construction. More realistic estimates make the site unviable.
- Impact of traffic from development will require improvements to junction 17 of the M4
- Impact of CLR on Wavin's operations and prospects for future expansion
- Adverse visual impact on local landscape and urban encroachment is unjustified and cannot be mitigated
- Site allocation is not required because housing needs can be met on brownfield opportunities or alternative sites that are more suited and easily developed
- The justification for a CLR is less without an ELR and development east of the River Avon
- Remove references to third access, presumption of further development east and properly define the design for a CLR

- 3.43 Comments that question the need for the Rawlings Green allocation are already considered in relation to preferred plan strategy (Issue 6) and the role of brownfield sites (Issue 7) which are discussed above. Rawlings Green has been assessed as an appropriate location for development as set out in the site selection report.

### **Issue 13 Traffic impacts of CLR**

- 3.44 Concerns about the traffic impacts of the CLR elaborate on questions about co-ordinating road construction. They are considered in the Evidence Paper: 'Improving highway network resilience at Chippenham'. Evidence Paper 3 Transport and Accessibility Part 2 explains the justification for a threshold of 200 dwellings for a completed link across the Rawlings Green site. Construction of the entire link before housing development would be an unnecessary and unacceptable burden on the development, which would be contrary to national policy (NPPF paragraph 173)
- 3.45 A road connecting Parsonage Way to the A350 is expected to be completed ahead of completion of the Cocklebury Link Road from Parsonage Way, over the railway line and on into Rawlings Green. Traffic management measures are available to direct traffic from using the B4069. The Evidence Paper 'Improving highway network resilience at Chippenham' refers to a contingency, via the Local Enterprise Partnership (e.g. Growing Places Fund), to resolve any financial imbalances should a developer be temporarily unable to fund the provision of part of the road.

### **Issue 14 Impact of CLR on Wavin's operations and prospects for future expansion**

- 3.46 Wavin did not object to the Plan when it was first submitted and it is surprising that objections should arise at this late stage. The route of Parsonage Way has always been envisaged as having the potential for a greater amount of traffic and a 'wider' role than just, as at present, solely serving Wavin. The road has that capacity without a need for further improvements. For this reason the road, built by Wavin themselves to accommodate their first expansion in the 1990s, also reflected the intention for adopted highway to extend to the railway line. The intention to dedicate the section of land beyond the built road is unambiguously demonstrated on the stamped adopted plan where it is identified as an 'area for future possible extension to Parsonage Way to be dedicated to Wiltshire County Council Highway Authority' and an annotation to show the precise extent of the road. The extent of the road is then shown in red on the scaled plan extending to the railway line.
- 3.47 More recently the future significance of Parsonage Way was discussed with Wavin as part of planning applications to secure their next phase of expansion (15/04763: Construction of car park and storage area: approved 15 December 2015). The Committee Report dealing with the application refers to Parsonage Way. It states that '*a consideration for this application is to ensure that these current proposals by Wavin are designed appropriately so as not to prevent the distributor road being delivered and being built to the necessary standards and compromise the potential future delivery of strategic growth in the area.*' The Company have therefore planned their expansion in full knowledge of the CSAP proposals and therefore the need to accommodate the intended role of Parsonage Way. The operational needs of the



Company were fully discussed at that time. Evidence in the form of this recent planning permission shows the CLR/Parsonage Way does not prevent expansion. The Council remain in discussion about support for their operations in Chippenham.

**Issue 15      The justification for a CLR is less without an ELR**

**3.48** The Site Selection Report provides the justification for the allocation of a strategic site at Rawlings Green. The evidence papers: ‘Improving highway network resilience at Chippenham’ (CTTRAN/12) explains that two access points are connected within the development site, providing a through route known as the Cocklebury Link Road. This connection is required to gain access to the site and support the number of homes proposed. This position is also explained in Transport and Accessibility Evidence Paper 2a (CEPS/05a)

**Chapter 5: Site Allocations – East Chippenham (Policy CH3)**

**Proposed Modifications: S69, S78, S80**

<i>Proposed Modification</i>	<i>Paragraph or plan reference</i>	<i>Number of representations</i>	<i>Comment ID</i>
69	CH3	26	17, 25, 33, 52, 58, 66, 72, 101, 123, 128, 141, 146, 37, 55, 67, 83, 98, 99, 104, 107, 112, 131, 48, 63, 166, 169
78	Figure 5.3	No comments	
80	5.19-5.31	1	48

*Proposed modification S69*

<i>Comment Id</i>	<i>Name</i>	<i>Summary of Comments</i>
17	N Murry	Support
25	J Scragg	Support
33	Chippenham TC	Support, but no ELR will impact traffic network
52	Tytherton Lucas Residents Assoc	Support
58	S Hartnell	Support
66	S Hames	Support
72	Stagecoach West	Withdraw Plan
99	T Molloy	Support
101	C Ranson	Support
123	L Ranson	Support
128	Jacques Partnership	Retain proposal for ELR
141	K Stuckey	Support
146	N Leatherhead	Support
37	P Tennant	Support
55	H Stuckey	Support

67	CAUSE2015	Support
83	P Ranson	Support
98	Chippenham 2020 LLP	Re-instate contrary to Plan objectives
104	N Hartnell	Support
107	C Caswill	Support
112	David Wilson Homes	Re-instate: ELR, housing delivery, deliver job growth
131	P Moss	Support
48	L Haines	Good location for development
63	R Robinson	Support
166	L Ranson	Support
169	N Murry	Support

*Proposed modification S80*

<i>Comment Id</i>	<i>Name</i>	<i>Summary of Comments</i>
48	N Murry	Good location for development

3.49 Most comments support removing the allocation at East Chippenham (Policy CH3), for the reasons set out in the site selection report or for different ones. Those that oppose the deletion of the allocations argue that deleting the allocation significantly hampers economic growth of the town, frustrates housing delivery, produces unacceptable traffic impacts and will cause harm to the natural, historic and built environment. The case is also made that to delete the allocation is so significant that the plan should be withdrawn.

**Issue 16 Re-instate the East Chippenham Allocation**

3.50 Step 8 of the Site Selection Report Enhanced Methodology, 2016 explains the reasons behind revisions to the plan strategy. Proposed modifications to the Plan deliver sufficient land for housing and employment development to at least meet strategic requirements over the plan period. This can be achieved without unacceptable traffic impacts or unacceptable harm to the natural, historic and built environment.

**Issue 17 The Plan has changed so significantly it should be withdrawn**

3.51 National Planning Policy Framework underlines the need for sustainable development to be plan-led (NPPF paragraph 17).

3.52 The revised strategy has been subject to public consultation. In substance, it retains two of the three strategic allocations that were part of the submitted plan and does not frustrate longer term opportunities for growth at Chippenham. Changes to the Plan are not so fundamental that it must be withdrawn.

3.53 The Inspector's notes of the progress meeting held on the 21<sup>st</sup> January 2016 includes:

*“ It went without saying that it was in everyone's best interest that the Chippenham Site Allocations Plan should be made capable of adoption by the end of 2016 and the*

*Inspector would do his best to ensure the Council had the best opportunity to achieve a satisfactory result.”*

## **Chapter 5: Site Allocations – Other**

### **Proposed Modifications: S45-S48**

<i>Proposed Modification</i>	<i>Paragraph or plan reference</i>	<i>Number of representations</i>	<i>Comment Id</i>
S45	Policy CH4	No comments	
S46	5.32	No comments	
S47	5.33	1	145
S48	new paragraph 5.34	2	143, 14

#### *Proposed modifications S47 and S48*

<i>Comment Id</i>	<i>Name</i>	<i>Comments</i>
14	Highways Agency	Agreement has been reached with Wiltshire Council on the transport strategy needed to support the Plan, in so far as the SRN is concerned and there is an in-principle agreement for the part signalisation of M4 Junction 17. Minor wording alterations suggested
143	CPRE	Bus lanes and pedestrian priority in relation to J17
145	CPRE	Connection to existing pedestrian/cycle network not mentioned

3.54 Comments in relation to the consideration of sustainable transport are discussed above under Issue 3.

## **Chapter 6: Monitoring and Implementation**

### **Proposed Modifications: S49 – S53, S87, S96**

<i>Proposed Modification</i>	<i>Paragraph or plan reference</i>	<i>Number of representations</i>	<i>Comment Id</i>
S49	Figure 6.1	No comments	
S50	Figure 6.1	1	122
S51	6.4-6.6	No comments	
S87	6.10, 6.11, Table 6.2	No comments	
S96	6.9	No comments	
S52	6.14	No comments	
S53	6.15	No comments	

*Proposed modification S50*

<i>Comment Id</i>	<i>Name</i>	<i>Comments</i>
122	Crest Strategic Projects Ltd and Redcliffe Homes Ltd	There is a realistic prospect of the site delivering all of its dwellings within the plan period.

**Glossary****Proposed Modifications: S54**

<i>Proposed Modification</i>	<i>Paragraph or plan reference</i>	<i>Number of representations</i>	<i>Comment Id</i>
S54	Glossary	No comments	

**Other Representations**

<i>Proposed modification</i>	<i>Paragraph or plan reference</i>	<i>Number of Representations</i>	<i>Comment Id</i>
No comment or rep of support	-	5	7,10,13,22,49
Support for CAUSE15	-	12	87, 171, 173, 175, 176, 177, 178, 179, 180, 181, 182, 183
Other	-	3	23, 36, 32

<i>Comment Id</i>	<i>Name</i>	<i>Summary of Comments</i>
7	Southern Water	No comment
10	Bath & North East Somerset Council	Supportive of proposed modifications
13	Natural England	No comment
22	Sport England	No comment
23	J Scragg	Presentation unclear
49	Historic England	No comment
36	RADAR	Safeguard Westinghouse Sports Ground
32	Chippenham TC	Traffic - no overview of highway network and peak flows, traffic data out of date, impact on surrounding villages and air quality. Insufficient account of economic requirements. Prioritise brownfield sites. Include expansion of the railway station
87	C Kent	Support CAUSE15
171	M Adcock	Support CAUSE15
173	F Pilbrow	Support CAUSE15
175	S Pilbrow	Support CAUSE15
176	P Wilkinson	Support CAUSE15
177	R Baldwin	Support CAUSE15
178	P Baldwin	Support CAUSE15
179	P Hillier	Support CAUSE15
180	M Baldwin	Support CAUSE15
181	D Baldwin	Support CAUSE15
182	P Burgess	Support CAUSE15

<i>Comment Id</i>	<i>Name</i>	<i>Summary of Comments</i>
183	N Johnson	Support CAUSE15

3.55 Comments by CAUSE15 are discussed elsewhere. Chippenham Town Council refer to a range of issues. Air quality is considered under Issue 9, the currency of the Chippenham Transport Model is considered under Issue 5 and the role of brownfield development under Issue 7 (above). Other issues are already under consideration.

