

**WILTSHIRE COUNCIL'S CHIPPENHAM SITE ALLOCATIONS PLAN
(CSAP)
INDEPENDENT EXAMINATION**

INITIAL APPRAISAL

Introduction

1. This document is intended to give a brief indication of those aspects of the Local Plan where main modifications are likely to be necessary for soundness reasons. These will form matters to be examined, including at the planned hearing sessions. They are based on my initial consideration of the Submission CSAP, together with the Council's Proposed Changes [doc CSAP/02], the evidence base and the submitted representations. This does not represent a final assessment of the Plan's soundness since that must also involve the results of the hearing sessions.
2. At this initial stage of the Examination there is nothing to suggest that the legal requirements for plan preparation, including the Duty to Co-operate, have not been met.
3. The CSAP has a very specific remit and must be considered in the context of the Council's adopted Core Strategy. The Core Strategy was adopted in January 20015 and, through Core Policy 10, provides for 26.5ha of new employment land and "at least" 4,510 new homes at Chippenham. The overall housing requirement was rigorously tested through examination and, as a consequence, the total was raised from 37,000 to "*..at least 42,000*". The evidence base included a Strategic Housing Market Assessment [CHSG02] dated December 2011 and there is a Housing Land Supply Statement [CHSG01] dated April 2014. As a consequence the Core Strategy's identified housing requirement for Chippenham provides an up-to-date evidence-based total. There is no contrary evidence to suggest this should be revisited and, indeed, it is not the purpose of this Examination to question the overall requirement of Core Policy 10.
4. The broad strategic areas for growth identified in the Core Strategy diagram at para 5.56 are indicated by barriers such as main roads, rivers and the main railway line. The A350 is identified as one such barrier to development so that the CSAP does not identify strategic areas to the west of the A350. This is a logical consequence of the appraisal at strategic level and there is no contrary evidence to suggest otherwise.

Affordable housing

5. There appears to be a discrepancy between the Sustainability Appraisal (SA) [CSUS/02 & 03] and the Strategic Sites Viability Assessment (VA) [CEPS/18].
6. For each of the 3 Strategic Sites (policies CH1 – CH3) the SA indicates a green colour grading against SA Objective 8: *providing everyone with the opportunity to live in good quality affordable*

housing and ensure an appropriate mix of dwelling sizes, types and tenures. This indicates a strongly or moderately positive effect.

7. However, the conclusion of the VA (para 7.1.3) is that “*..with the exception of South West Chippenham the sites do not currently support a policy compliant level of affordable housing*”. Looking at the detail, even at the lower CLG range of gross site values (£0.250m per hectare), North and East Chippenham, and Rawlings Green cannot support more than 30% affordable housing. At the higher CLG gross site value (£0.350m per hectare) none of these three sites will support more than 20%.
8. Taken at face value, on the basis of the VA conclusions, none of these Strategic Sites can be said to be policy compliant with Core Policy 43: Providing Affordable Homes. The Core Policy identifies Chippenham as within the zone intended to provide 40% affordable housing – on the basis of a broad assessment of viability across the Plan area.
9. During consideration of the submitted Core Strategy, the Inspector refers to further work undertaken by the Council with regard to affordable housing and development viability (CWC007, para 109) and states this has led the Council to acknowledge a two tier approach to requiring the provision of affordable housing. He concludes that the approach does risk being a rather blunt tool to address the issue but nonetheless that the revised Policy 43 does maintain an important flexibility.
10. The matter is of concern since it is the stated intention of the Core Strategy that approximately 13,000 affordable homes will be delivered within the Plan period. If one of the settlements within the 40% zone intended to provide a significant proportion of those affordable dwellings cannot be developed viably, then the “*..clear and robust policy framework..*” referred to in the Core Strategy (para 6.42) cannot be delivered in respect of a key location for delivery of affordable housing. In this respect supporting text to Core Policy 45 advises that “*it is fundamental to the success of this strategy that the right types of homes are delivered*” (para 6.51).

The Eastern Link Road

11. The proposals include the provision, through development, of an “Eastern Link Road” (ELR). However, there is no specific section of the Plan which provides a case for the road which, effectively, forms a northern by-pass linking the A350 in the north to the A4 in the east. The first specific reference to an eastern link road occurs as a bullet point in para 4.5 in the context of the North Chippenham Strategic Site. However, the indicative master plan for the North Chippenham development [doc CSAP03, para 4.3] shows the first stage of the route as a limited access distributor road outside of the development envelope and showing a possible ‘parkway’ character. For clarity reasons the Plan should give a clear indication of intent that a distributor road linking the A350 to the A4 in the east is part of the Plan’s proposals, in the same way that Policy CH4 has been introduced to give clarity to the proposal for Riverside Country Parks.

12. The recommendations in Evidence Paper 3 – Transport & Accessibility (Part 2) [doc CEPS05-EP3] stress “*in transport and accessibility terms, the most preferable long term development strategy for Chippenham is to focus development to the north and east of the town*” (para 4.4). It then advises that “*the Eastern Link Road through Strategic Areas A,B and C is proposed as the key piece of transport infrastructure required to unlock the town’s long term development potential*” (para 4.5). However, it acknowledges that, due to the expected costs of the rail and river crossings, the road would need to be funded, at least in part, by the developments (para 4.7) with the road delivered in phases alongside housing development.
13. There appear to be two inescapable consequences of the costs and timing of the Road: firstly, that there will be an inevitable impact on the amount of affordable housing which the developments can support – and it is not clear from the documentation if this would be over and above the reduced provision anticipated by the VA – and secondly; that the delivery of development, notably in the South West Strategic Site, appears to be skewed to ensure the phases of the road proposal can be delivered without undue delays [doc CEPS05-EP3, para 4.11] .
14. The Chippenham Transport Strategy Development Assessment, dated May 2013, [doc CTRAN01] includes consideration of delivery of the spatial strategy for Chippenham envisaged in the (then) draft Core Strategy, but does not consider road proposals to the east of Rawlings Green – although it does indicate that all of the scenarios tested would accommodate the predicted demand from the Core Strategy allocation (as then envisaged). The Wiltshire Infrastructure Delivery Plan, Chippenham Extract, September 2013 [doc CWCO06] also makes no mention of development east of Rawlings Green Chippenham and therefore includes no identified funding for the link incorporated into the East Chippenham Strategic Site. It does, however, include estimates totalling over £5m for transport related costs, including the railway bridge, in respect of the Rawlings Green Strategic Site and some £6.7m for the South West Strategic Site.

Environmental considerations

15. The residual housing requirement, after allowance is made for completions 2006-2014 and commitments at April 2014, is 1,935 dwellings (Table 4.1). At para 4.22, the Plan indicates that the three sites can accommodate a total of approximately 2,500 homes, of which 2,350 may be built within the Plan period to 2026. It also states that the remainder – 150 houses – will contribute to meeting the requirements for the next Plan period. The benefit is seen as reducing the potential for fall-off in housing supply whilst a new plan is emerging. It is further justified as providing a flexible choice of deliverable sites in terms of the range of housebuilders and locations. However, the resulting over-provision amounts to some 560+ dwellings or an additional 25-30%.

16. The Plan also indicates, at para 5.20, that of the two areas allocated for employment generating uses in the East Chippenham Strategic Site, the smaller is intended to meet needs within the Plan period, whilst the larger is safeguarded for development "*..focussing on needs up to and beyond 2026*". However, Policy CH3, second bullet, advises that the further 15ha is safeguarded for employment development beyond 2026 – a subtle, but important difference. The timing of development is seen as depending upon the road connection to the A350 by completion of that part of the ELR. Excluding this second employment site, the three Strategic Sites provide for 28ha of employment land, against a residual requirement of 21.5ha – again a significant over-provision of some 30%.
17. In itself, a degree of over-provision is not necessarily an issue; as indicated, it provides for a degree of flexibility in development location and aids deliverability. However, this has to be seen against the consequences of the over-provision in terms of location. In the case of both the employment land, and the housing provision (notably the isolated allocation to the north of the North Wiltshire Rivers Route which is a National Cycle Route), the allocations are on the periphery and clearly closely connected to provision of the final part of the ELR: indeed, access is dependent on the ELR.
18. The Plan acknowledges that landscape impact in this area is a significant concern, as is the need for considerable work to avoid increased flood risks to the town and elsewhere. (para 4.21). The former point is recognised in the Landscape Setting Assessment [doc CEPS06] at para 6.25 "*The open character and strong association with the rivers and floodplain are important characteristics to safeguard. The generally remote character to the north of the North Wiltshire Rivers Route and at the eastern end of Stanley Lane is important to conserve*". In respect of the latter point, Evidence Paper 6: Flood Risk and Surface Water Management [doc CEPS10-EP6] concludes that, "*on balance Area C appears the least attractive for development in terms of flood risk and surface water management compared to the others because of the degree to which flooding is an issue to tackle and the extent of flood risk land*" (para 4.17).
19. The matter of concern here is that the Plan is over-allocating in both housing and employment land requirements, specifically in an area which the evidence base suggests is environmentally sensitive and the least attractive in terms of flood risk.

Soundness issues

20. From this initial appraisal I have identified three matters which appear to raise significant concerns regarding soundness
 1. Although the Plan does not, itself, deal specifically with the issue of affordable housing, Objective 2, reflects both the Core Strategy, Strategic Objective 3, indicating that there will be a mix of house types and locations (open market and affordable) (para 3.6), and the Wiltshire Community Plan which seeks to address the lack of affordable homes. The evidence suggests

the Plan is not policy compliant with the Core Strategy and will not deliver the expected proportion of affordable homes. On the surface, this appears to be largely a result of infrastructure and other costs associated with the development sites.

2. The second concern is that the site allocations strategy has been driven to a significant extent by the perceived need to complete an ELR providing, effectively, a northern bypass to the town. The evidence base does not appear to include estimated costs for the eastern part of the route, associated with the East Chippenham Strategic Site and there must remain some doubt that the development will be viable and deliverable since it would involve a new river bridge, with additional works to ensure the structure does not impede water flows, presumably (although not actually mentioned) a bridge crossing for the North Wiltshire Rivers Route and, in addition, significant flood prevention works.
3. It is clear that the over-allocation of both housing and employment land is driven primarily by the need to support and justify the eastern part of the ELR. This appears to ignore significant and legitimate environmental, landscape and flood risk concerns which would suggest that inclusion of the housing allocation to the north of the North Wiltshire Rivers Route and the larger of the two employment allocations intended for development beyond the Plan period, are unsound.

Future Examination of the CSAP

21. The Council will naturally be disappointed that potentially serious concerns with soundness have been identified at this stage. However, these are matters which require further consideration, investigation or clarification. In order to establish the best way to proceed with the Examination it would be helpful if the Council could respond to the concerns by the 28 September.
22. Other matters have been raised in representations. If the Examination proceeds in line with the initial Draft Programme of Events [PTW/26.08.2015] these and other matters which arise as the Examination progresses will be included in the final Matters and Issues to be fully debated at the hearing sessions.

Patrick Whitehead (Inspector)

14/09/2015