Working towards a core strategy for Wiltshire

Wiltshire Core Strategy

Appendix D – Representations received on Sustainability Appraisal

with officer comments

June 2014
<table>
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<tr>
<th>Comment ID: 66</th>
<th>Consultee</th>
<th>Agent</th>
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<tbody>
<tr>
<td>Person ID: 837808</td>
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**Please give details of why you support or do not support the updates to the Sustainability Appraisal Report.**

3.8.2 The Neighbourhood Plan Steering Group are alarmed to see that the Wiltshire Core Strategy SA Addendum still states for Devizes that "there is a lack of available brownfield sites so the majority of growth will need to be located on greenfield sights on the edge of the urban area". This statement is completely at odds with both the Wiltshire SHLAA and the Devizes Area Neighbourhood Plan.

**Does your representation relate to a previous one you submitted. If so, has the Council satisfied your objection through the proposed changes**

**Attached files (Please see Objective)**

**Officer Response**

Comments noted. It is recognised that the draft Devizes neighbourhood plan (consultation version January 2014) proposes the allocation of a number of brownfield sites within the settlement boundary of Devizes and that the plan has identified sites to 2026 for 444 dwellings (page 51). The latest version of the Core Strategy (EXAM/34b), which includes the additional housing requirement figures, shows a housing remainder figure for the town of 437 dwellings to be identified. It is possible that the remaining housing requirement at Devizes could be located on brownfield sites if those brownfield sites are available and deliverable.
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| **Consultee** | Mr Simon Fisher  
Devizes Town Council |
| **Person ID:** | 838183 |
| **Agent** | Person ID: |

**Please give details of why you support or do not support the updates to the Sustainability Appraisal Report.**

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**Does your representation relate to a previous one you submitted. If so, has the Council satisfied your objection through the proposed changes**

**Attached files (Please see Objective)**

**Officer Response**

Comments noted. It is recognised that the draft Devizes neighbourhood plan (consultation version January 2014) proposes the allocation of a number of brownfield sites within the settlement boundary of Devizes and that the plan has identified sites to 2026 for 444 dwellings (page 51). The latest version of the Core Strategy (EXAM/34b), which includes the additional housing requirement figures, shows a housing remainder figure for the town of 437 dwellings to be identified. It is possible that the remaining housing requirement at Devizes could be located on brownfield sites if those brownfield sites are available and deliverable.
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| **Consultee** | Mr Mark Funnell  
National Trust |
| **Person ID:** | 840469 |
| **Agent** |  |
| **Person ID:** |  |

**Please give details of why you support or do not support the updates to the Sustainability Appraisal Report.**

Para 3.3.4 should arguably also refer to the "setting" of the World Heritage site, given the content of para. 6.140 of the Core Strategy (i.e. the need to protect the WHS and its setting from inappropriate development). Once this step is taken, it should be ensured that the "sizeable increase" in the housing allocation for the Amesbury Community Area could indeed be delivered whilst avoiding adverse effects on the historic environment.

**Does your representation relate to a previous one you submitted. If so, has the Council satisfied your objection through the proposed changes**

**Attached files (Please see Objective)**

**Officer Response**

Comments noted. It is agreed that paragraph 3.3.4 could be clarified to refer to 'setting', consistent with references elsewhere in the Sustainability Appraisal.
<table>
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| Consultee | Mr Mark Funnell  
National Trust |
| Person ID: | 840469 |
| Agent | |
| Person ID: | |

**Please give details of why you support or do not support the updates to the Sustainability Appraisal Report.**

Para 3.3.6 notes that the "considerable number of additional homes" involved with the Army rebasing proposals would have "cumulative effects on landscape and infrastructure". Cumulative effects are also likely to apply to the historic environment. Para 3.3.6 also notes that the specific numbers and locations of new Army homes are "not known" at this stage, and that "further assessment of the effects of army rebasing will be required". However, according to the MOD consultation from February 2014, the proposals involve an additional 1380 dwellings for service families, and nearly 3000 units of single living accommodation. (This is despite the insertion of a reference to Army rebasing in the August 2013 version of the Core Strategy being classed as a "minor modification"). It is questioned how it can be ensured that the increased housing allocation for the Amesbury area combined with the significant Army rebasing proposals can still avoid adverse effects on the World Heritage Site and its setting, and achieve sustainable development.

**Does your representation relate to a previous one you submitted. If so, has the Council satisfied your objection through the proposed changes**

**Attached files (Please see Objective)**

**Officer Response**

The Core Strategy proposed modifications do not refer to the specific number of additional MOD homes to be provided. However, Core Policy 37 provides the strategic policy context within which the Army Rebasing proposals will be assessed, which has in itself been subject to Sustainability Appraisal as well as policies on the protection of the Stonehenge and Avebury World Heritage Site.

The revised Core Strategy refers to approximately 2785 new homes to be provided with about 2440 occurring at Amesbury. The Sustainability Appraisal Addendum does state that the additional housing required is ‘considered achievable in sustainability terms, depending on the future location of development sites, which are not known at this stage, and the mitigation of any adverse effects. Future development will need to avoid adverse effects on the Stonehenge and Avebury World Heritage Site, but this is achievable through careful selection of future sites’.
I write to place on record my reservations about the Sustainability Appraisal within the Core Strategy, as reflected in the updated Addendum of April 2014. My comments are made particularly in reference to the assumptions underlying the intended future expansion of the built-up area of Chippenham and the concomitant adverse impact on the adjacent countryside.

My concerns about the soundness of the documentation apply to the implications of references to Chippenham in the details in Exam99, the ‘Sustainability Appraisal (SA) Addendum (April 2014)’, linked to the main Strategic Appraisal document. I am particularly concerned about the threat to build upon the greenfield site at Birds’ Marsh, Chippenham. In this respect I fear that the presumptions about sustainable development within this documentation are not robust.

3.2.3 It is disappointing that the allocation of proposed housing at Chippenham is to be substantially increased. The modified document appears to be even more out of step with principles of sustainability.

3.6.1 The text appears to be sprinkled with unwarranted, value-laden assumptions. I question the soundness of this. There have been consultations for several months and years. What now appears to be proposed – an increase in building, alongside the inspector's implication that there may be a dilution of the percentage of new housing that is affordable housing in the county (c.f. EXAM86), undermines the case that such developments will address the issues of housing need, healthy communities, social inclusion or poverty. The kinds of developments proposed for greenfield sites such as ‘North Chippenham’ [sic] referring to the land at Birds’ Marsh, Chippenham are for car-dependent communities, attractive to developers due to their proximity to the M4 corridor and opportunities for out-commuting.

Terms like ‘economic growth’ are cited in an ill-defined way as a public good. The growth of what kind of economic activity, and for whose benefit? Economic growth is a blunt instrument as an indicator of positive social value, especially high-impact and non-distributive. It is not sound to put forward economic growth as being in some way an unalloyed public good. A road accident, fatal fire or any kind of natural or human disaster might contribute to reconstruction and increased expenditure and so inevitably boost economic growth but it would be perverse to attribute to this public good. In the Twenty-First century we need more nuanced and intelligent indicators of social well-being. Notions of growth in this document seem to be based on the premise that they will continue more or less as they have done in the Twentieth Century. We know with at least 95% certainty from the newly published Intergovernmental Panel on Climate Change report that this will not happen. Economic growth for example has not been decoupled from increased emissions of increased energy consumption and climate change gases.

The Fifth Assessment report of the IPCC includes the conclusions that: Atmospheric concentrations of carbon dioxide, methane, and nitrous oxide have increased to levels unprecedented in at least the last 800,000 years”. Human influence on the climate system is clear. It is extremely likely (95-100% probability) that human influence was the dominant cause of global warming between 1951-2010.

It is imperative that these factors are taken into account and addressed at the local level in areas of the affluent West if progress is to be made globally. The area at Birds’ Marsh is exactly the kind of location that we need to protect due to its varied habitat contributing to biodiversity, its status as accessible countryside for recreation and well-being and its value as agricultural land for ensuring food
security for future generations.

This section of EXAM 99 is grounded in the principles set out in the larger Sustainability Appraisal document. To my understanding there is a significant mismatch between the rhetoric set out in the following and what is actually proposed in Chippenham and doubtless elsewhere in the county:

Chippenham and Salisbury. Market towns and service centres will have become more self contained and supported by the necessary infrastructure, with a consequent reduction in the need to travel. In all settlements there will be an improvement in accessibility to local services, a greater feeling of security and the enhancement of a sense of community and place. This pattern of development, with a more sustainable approach towards transport and the generation and use of power and heat, will have contributed towards tackling climate change. Wiltshire will be thriving and vibrant, where people can learn and develop their skills, enjoy a good quality of life and good health in a safe, clean neighbourhood, appreciate a superb environment which makes the most of the natural landscapes and historic buildings and compliments them with exciting new buildings. It will be a place where people, irrespective of their background, can realise their potential and enjoy their lives. Employment, housing and other development will have been provided in sustainable locations in response to local needs as well as the changing climate and incorporating exceptional standards of design. Partnership working with communities will have delivered a number of neighbourhood plans in a manner that allows the community to receive the benefit of managed growth’.

In the case of the Birds’ Marsh development it is reasonable and objective to consider it as a high- volume estate favoured by developers’ for its ready commuter to the M4 corridor. The developers had not provided a required transport assessment during 2013 nor, as far as I am aware, have they delivered one since.

The development at Birds’ Marsh does not make the most of the natural environment; it threatens the hedgerows and meadows above Hill Corner Road, these being both valuable in their own right and the ecological support system for the last surviving large wood in the Chippenham area. Additionally the notion of ‘partnership working with local community’ is belied by attempts to overturn a village green designation that was democratically achieved to preserve the green space for wildlife, common access and public recreation. This does not ‘safeguard the natural and built environment’.

Another statement about sustainability in the supporting contextual documentation claims that: 5.12.65 “All development should meet high levels of energy and water efficiency and consider meeting the majority, if not all, of the energy and heat demand through renewable or low carbon forms of generation. There is potential on the strategic sites to provide renewable forms of energy and heat on site, and to link in with adjoining residential/employment areas”.

Contrary to this claim I have seen nothing in the plans for this site to suggest that there will be measures such as passivhaus technology or combined heat and power to that would be necessary to make this a carbon neutral development. Again terms like ‘should…consider’ and ‘potential…to’ are vague, are not robust and tend to render the sustainability documentation greenwash rather than a serious statement of future intention.

3.6.3 “Limited land opportunities have inhibited development in the past, and this needs to be addressed urgently, but growth also needs to be underpinned by investment in new infrastructure.” This is a further rather subjective assertion and, as such, vulnerable to
counterclaims. This is not my perception of what has happened in Chippenham in recent decades. The town has grown rapidly with lots of poor quality development and semi-urban sprawl where a proliferation of out of town developments have been accompanied by low-grade ‘shed’ architecture, ring roads and increasing traffic burden, the loss of agricultural land and green spaces, the closure of hospitals, public toilets, a diminished market and the loss of distinctive independent shops and key cultural venues such as Golddiggers. Positive cultural developments have taken place such as the construction of the Wiltshire History Centre, the expansion of the College and the restoration of the Buttercross have not required the destruction of the natural environment or the construction of new roads.

Building on prime agricultural land does not to my mind ‘deliver a more resilient long term future’. Even the statement put forward by Turley Associates concedes that the development will cause the loss of higher grade agricultural land against which it is not possible to mitigate (http://www.wiltshire.gov.uk/corestrategypositionstatement?directory=Matter%2009C%20Chippenham%20CA&fileref=13 section 1.12)

The loss of such land in the context of increasing climate change and concerns about future food security is unacceptable.

3.6.11 “Chippenham is relatively unconstrained with regard to national and European environmental designations.” It is not clear to me what this means. It is not sound to represent the countryside at Birds’ Marsh to the north of Chippenham as having no environmental value. In terms of advocacy, the question of the environmental value of this location is particularly controversial, given the working partnership of the Wiltshire Wildlife Trust with the developers in this case.

Greenfield development in such a sensitive area, a rich habitat, accessible to, heavily used and cherished by the local community, needs to be reconsidered. The cultural value of this location should also not be overlooked, particularly given its close ties to both Francis Kilvert the diarist and Robin Tanner a prominent Twentieth-Century artist. There are plenty of undeveloped and brownfield sites in the West Country as a whole, it makes no sense to build dormitory estates by the motorway for out-commuting.

There appears to be some confusion throughout the sustainability appraisal statements in the conflation of contradictory notions of sustainability. Sustainable development implies, even in its weakest sense, meeting the needs of the present generation without jeopardizing the interests of future generations, while sustaining continuous, infinite growth on a finite planet would inevitably eventually jeopardize the interests of future generations.

To conclude, to in my opinion the modified sustainability documentation is not sound in respect to the proposed developments in Chippenham in so far as it fails to demonstrate that the intended dwellings would be in any sense sustainable. Proposals to build on this site have been rejected in the past due to their detrimental impact on the environmental. It seems perverse that the Wiltshire Core Strategy would now, when the environmental challenges facing us are even more severe, seem to facilitate such a development. This would be seriously detrimental to the character of Chippenham and, furthermore, would set a precedent for additional unsustainable development in the future.
The Sustainability Appraisal (SA) Addendum focuses on predicting those significant effects considered likely from the proposed modifications to the Chippenham policy CP10. The amount of housing required in Chippenham, and in Wiltshire generally, has increased and the disaggregation of additional housing to community areas is described in the Addendum to Topic Paper 15 Housing Requirement Technical Paper (EXAM84).

The SA Addendum recognises that strategic sites in Chippenham will now be allocated through a specific Chippenham Site Allocations DPD which will be informed by its own Sustainability Appraisal. The SA Addendum states in paragraph 3.6.5 that ‘the revised policy includes a significant minimum increase in additional new homes for the community area and it is considered that the range of significant effects already highlighted in the SA Report are still relevant and likely to occur through this level of growth’. Paragraph 3.6.6 states ‘the precise nature of the impacts of development is less certain now because of the removal of the strategic allocations. There are short-term uncertainties of housing delivery now and with no strategic sites allocated, there is the real possibility of applications being made on sites that are less sustainable, sites that have not been considered through the Core Strategy consultation process and not subject to SA or HRA’.

There is a requirement for the SA to consider the potential significant effects of policy and to recommend mitigation measures that may reduce or remove adverse effects. The SA Addendum and main SA Report contain recommendations of such measures throughout. It is considered that the SA Addendum has predicted the likely significant effects of the proposed modifications in an accurate and appropriate way which meets the requirements of the Strategic Environmental Assessment Directive.
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| **Consultee** | Campaign for Better Transport JD Raggett  
Campaign for Better Transport, Bristol and Bath  
Travel to Work Area |
| **Person ID:** | 466498 |
| **Agent** |
| **Person ID:** |

**Please give details of why you support or do not support the updates to the Sustainability Appraisal Report.**

We have read the addendum to the Sustainability Appraisal and also the Viability Study. Our conclusions are that:  
That it seems unlikely, given that a great deal of the housing in West and North Wiltshire is so marginally viable, that there will be sufficient developer contributions and funds to deliver the sustainable transport needs of large areas of housing in a place which already has a deficit.  
The SA Addendum builds on the previous SA reports. However with a lack of funds now apparent, to offset the many unsustainable effects already noted in the first SA report, we question whether it is really the case that substantially more housing can be assimilated in North and West Wiltshire. Will the development of West and North Wiltshire really deliver sustainable development in the context of the NPPF, or are there simply not enough funds to do much more than build the houses and very basic infrastructure to support them?  
We remain concerned that there is little if anything in the SA or indeed in the modifications to the Core Strategy proposed regarding how West and North Wiltshire relates to Bath, and in particular how transport (all modes) will work between Bath and the new commuter suburbs of Wiltshire.

**Does your representation relate to a previous one you submitted. If so, has the Council satisfied your objection through the proposed changes**

**Attached files (Please see Objective)**

**Officer Response**

Comments noted. The Sustainability Appraisal (SA) Addendum has highlighted and discussed any additional significant effects considered likely to result from the Core Strategy modifications. It must be read in conjunction with the main SA Report which has assessed predicted effects for transport. All future applications for housing will be assessed against the transport policies Core Policy 60 to Core Policy 66.
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<tr>
<td>Person ID:</td>
<td>382216</td>
<td>Mr Charles Routh</td>
<td>Person ID:</td>
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**Consultee**  
Mr Charles Routh  
Natural England

**Agent**

**Please give details of why you support or do not support the updates to the Sustainability Appraisal Report.**

We have no comments to make on the Sustainability Appraisal of the modifications to the Core Strategy.

**Does your representation relate to a previous one you submitted. If so, has the Council satisfied your objection through the proposed changes**

**Attached files (Please see Objective)**

**Officer Response**  
Comments noted.