

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

MATTERS TO BE EXAMINED BY WAY OF PUBLIC HEARINGS

Introduction

The Examination into the Chippenham Site Allocations Plan was suspended in November 2015 to enable Wiltshire Council to undertake a Schedule of Work in response to concerns raised in my letter dated 16 November. The Council has now responded with Proposed Modifications to the Submission Plan and a revised Sustainability Appraisal Report.

This Examination is now resumed and will consider whether, with those Proposed Modifications, together with any further Modifications arising during the course of the resumed Examination, the CSAP can now be found sound. This document gives a brief indication of the Matters and Issues to be considered by the Examination at the Public Hearings. They are based on my consideration of the Submission Chippenham Site Allocations Plan as amended by the Council's submitted Proposed Changes, the revised Sustainability Appraisal, the evidence base and the submitted representations.

The National Planning Policy Framework (paragraph 182) makes clear that to be sound, a Local Plan should be:

- a. positively prepared;*
- b. justified;*
- c. effective, and*
- d. consistent with national policy.*

This is an interim list of matters and issues which can be expanded and participants may help by giving any indication of potential omissions prior to the preparation of a final list for incorporating in agendas for hearing sessions (this is NOT a call for additional statements or evidence).

Matter 1 – Legal requirements

Although reviewed at the previous Hearings, it is necessary to revisit this Matter to ensure the Submission Plan together with the Proposed Modifications remains compliant with the legal requirements.

Issues

- Has the CSAP been prepared in accordance with the Local Development Scheme?
- Has consultation been compliant with the requirements of the Statement of Community Involvement?
- Has the Plan been subject to Appropriate Assessment in accordance with the Habitats Directive?
- Is the Plan compliant with national planning policy?

- Has the Duty to Co-operate been properly discharged?

Matter 2 – Site Selection Procedure

The Site Selection procedure was a significant concern with the Submission Plan and the Council has responded with an Enhanced Methodology which underpins the Proposed Modifications. This is a Matter which must be revisited.

Issues

- Has removing the two stage approach to site identification resulted in a fairer comparison of alternative development strategies?
- Has the new Strategic Site Assessment Framework, replacing the ranking of the Core Strategy criteria, resulted in a more appropriate interpretation of the CP10 criteria?
- Does the specific new evidence properly support the revised methodology?
- The exercise of planning judgement is necessary for the process of selecting appropriate sites for development. Has the Enhanced Methodology resulted in the appropriate sites being taken forward?
- Has the balance between the Site Selection Process and the results of the revised Sustainability Analysis resulted in the most appropriate proposals for including in the CSAP?

Matter 3 – Sustainability Appraisal

The Sustainability Appraisal was subject to detailed examination at the previous Hearings and was not found to be adequate. The Council commissioned an updated SA Report together with an SA of the Proposed Modifications. This is a Matter which must be revisited.

Issues

- It is a requirement that the Sustainability Appraisal should be adequate: does the SA, as updated and supplemented, provide an adequate framework for assessing the sustainability of the alternative strategic areas?
- Has the identification of a larger set of strategic site options aided the process of selecting strategic sites for development?
- Does the appraisal provide a satisfactory means of identifying a preferred development strategy?
- Is the resulting preferred strategy sufficiently robust in meeting the Core Strategy objectives?

Matter 4 – The Revised Evidence Base

It was agreed that parts of the evidence base would have to be revisited as part of the Schedule of Work and supplementary documents have been submitted in respect of:

- *Habitats Regulation Assessment;*
- *Highway network resilience;*
- *Transport & Accessibility Evidence;*
- *Strategic Site Viability Assessment;*
- *Planning for air quality;*
- *Future management of the Riverside Country Park.*

Issues

- Does the additional evidence support the chosen strategy?
- Has the additional transport evidence properly considered the strengths and weaknesses of the Strategic Site Options?
- Is there sufficient evidence to show that the preferred development allocations would not have an adverse impact in terms of transport and accessibility?
- Does the supplementary evidence show that road proposals in support of the development sites are deliverable?
- Does the revised viability assessment provide convincing evidence that the selected development sites will be able to support the provision of necessary infrastructure whilst also supporting 40% affordable housing provision?
- Do the future management proposals for the country park areas provide sufficient clarification to ensure the long term management of the parks?

Matter 5 – General (Proposed Modifications S4; S15)

Issues

- Does the Proposed Modification S4 provide appropriate wording to ensure the barrier to development provided by the A350 is not breached?
- Does the chosen Mixed Strategy represent the best overall solution to the delivery of the required homes and jobs within the Plan period?
- Has the Plan recognised the full potential for brownfield and windfall opportunities within the town to contribute to the overall development needs?
- Has the selection process taken full account of the potential performance of a southern link road?
- Have the Proposed Modifications resulted in a total re-write such that there is, effectively, a new plan?

Matter 6 – South West Chippenham (Proposed Modifications S18 – S30)

Issues

- Has the addition of further housing to the South West Chippenham development been adequately justified?
- Have the infrastructure requirements required for the scale of development included in CH1 been properly assessed?
- Has the Site Selection Process robustly evaluated alternatives to the three Smaller Extension Sites?
- Has sufficient account been taken of the impact of the proposals on the wider road network, including on Lacock?
- Are sufficient safeguards in place to ensure the future protection of the Rowden Park Conservation Area?

Matter 7 – Rawlings Green (Proposed Modifications S31 – 44)

Issues

- Is the development of the Rawlings Green Strategic Site deliverable within the Plan period?
- Is the development of Rawlings Green fully justified without the further development to the east and provision of an Eastern Link Road?
- Has the traffic impact of the Cocklebury Link Road (CLR) been properly assessed?
- Should provision of the CLR be considered as a pre-requisite to development of the CH2 Strategic Site?
- Has sufficient consideration been given to the prominence of the area in the wider landscape?
- Has there been sufficient consideration of flood risk associated with major development in this area located upstream of the built-up area?

Matter 8 – East Chippenham (Proposed Modifications S69; S78; S80)

Issues

- Should the East Chippenham Strategic Site and the Eastern Link Road be reinstated as part of the development strategy?
- Does the development strategy provide sufficient flexibility to meet the housing requirement within the Plan period?
- Should the site at Gate Farm, part of the CH3 Strategic Site, be reinstated?

Matter 9 – Omission sites

Issues

- Land at Saltersford Lane
- Land north and east of Barrow Farm
- Land at Forest Farm
- Land east of the B4528, west of the River Avon & south and east of the Nursery

Matter 10 – Other matters including Monitoring and Implementation

Issues

- Should the CSAP include more detailed provision for indoor and outdoor sports, including 'pooled off-site provision'?
- Are further textual changes necessary to provide clarity and effectiveness?
- Will the revised Monitoring and Implementation Chapter provide an adequate framework to ensure the CSAP delivers the required homes and jobs together with related infrastructure within the Plan period?
- Does the new anticipated housing delivery trajectory reflect realistic rates of delivery for each of the strategic sites?

Patrick Whitehead (Inspector)

5/09/2016