

WILTSHIRE COUNCIL

CHIPPENHAM SITE ALLOCATIONS PLAN RESPONSE TO INSPECTOR'S INITIAL APPRAISAL

1. Introduction

1.1 The following statement sets out Wiltshire Council's response to the points raised by the Inspector in his 'Initial Appraisal' of the Chippenham Site Allocations Plan (core document reference EXAM01).

1.2 Within the statement the Council refers to the process which underpins the development strategy included within the Chippenham Site Allocations Plan (CSAP), which is explained in the Site Selection Report (CSAP/03) and Briefing Note 1 - Strategic Site Selection Methodology (CEPS/12). The site selection process evolved from the six requirements for strategic site development in Core Policy 10 of the adopted Wiltshire Core Strategy (CWCO/01), which are:

1. *The scope for the area to ensure the delivery of premises and/or land for employment development, reflecting the priority to support local economic growth and settlement resilience.*
2. *The capacity to provide a mix of house types for both market and affordable housing, alongside the timely delivery of the facilities and infrastructure necessary to serve them.*
3. *Offers wider transport benefits for the existing community, has safe and safe and convenient access to the local and primary road network and is capable of redressing transport impacts, including impacts affecting the attractiveness of the town centre.*
4. *Improves accessibility by alternatives to the private car to the town centre, railway station, schools and colleges and employment.*
5. *Has an acceptable landscape impact upon the countryside and the settings to Chippenham and surrounding settlements, improves biodiversity and access and enjoyment to the countryside.*
6. *Avoids all areas of flood risk (therefore within zone 1) and surface water management reduces the risk of flooding elsewhere.*

1.2 The Inspector's Initial Appraisal concludes with three concerns regarding:

- Affordable housing
- The eastern link road; and
- Environmental considerations

This statement addresses each in turn.

2. Affordable housing

- 2.1 The Inspector in his Initial Appraisal raises concerns about the delivery of affordable housing at paragraph 20 (1) of his appraisal:

“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.”

- 2.2 This section addresses the Inspector's reasons for concern contained in Paragraphs 5 to 10.

- 2.3 Wiltshire Council considers that the evidence supporting the CSAP demonstrates that the Plan does comply with the Wiltshire Core Strategy (WCS) policy on affordable housing. The CSAP will deliver the number of affordable dwellings envisaged by the WCS (CWCO/01), even on pessimistic assumptions of costs and development values. The Council considers that the CSAP is also capable of achieving a 40% proportion of affordable homes on each of the strategic sites. The Council's reasons for this are set out below.

Context

- 2.4 Objective 2 of the CSAP '*providing housing supported by appropriate infrastructure*' reflects WCS Strategic Objective 3 '*providing everyone with access to a decent and affordable home*'. Paragraph 3.6 of the WCS in relation to Objective 3 states:

“This strategy makes provision for at least 42,000 new homes in Wiltshire in the plan period from 2006 to 2026. It sets out a plan for an appropriate mix of types, sizes and tenures, particularly affordable housing over the plan period that is aligned to job growth and infrastructure delivery”.

- 2.5 It goes on to explain these will be delivered in the most sustainable locations, with primary focus at the three Principal Settlements including Chippenham and the market towns.
- 2.6 The WCS states that: *“It is anticipated that this strategy will deliver approximately 13,000 affordable homes within the plan period”* (paragraph 6.42, WCS). This is to be provided through delivery on all sites involving 5 dwellings or more, including strategic sites at Chippenham, and on exception sites. With a plan wide minimum housing requirement of 42,000 new homes over the period 2006 to 2026, proportionally the affordable housing target is about 31% of this total.

2.7 Core Policy 43 introduces two zones for affordable housing delivery. Chippenham is within the 40% zone. In accordance with Core policy 43, therefore, 40% of the homes on the strategic sites at Chippenham should be affordable.

2.8 The evidence shows Chippenham falls on the edge of the of the 30% zone. Indeed a small part of the East Chippenham strategic site does come within the zone for this lower level. The WCS Inspector accepted a 40% proportion in the light of evidence comparable to the CSAP VA, but in so doing he recognised the two tiers are a rather blunt tool and that policy could reasonably be aspirational as well as needing to be capable of delivery (Paragraphs 105 and 110, WCS Inspector's Report, CWCO/07).

2.9 As the Inspector identifies in his Initial Appraisal at paragraph 9, Core Policy 43 also includes flexibility to aid the effectiveness of the Plan. This is recognised by the WCS Inspector at paragraphs 108 and 110 of his report stating: "*Core Policy 43 does maintain an important flexibility to consider on a specific site basis the necessary provision of affordable housing*" (Paragraph 110, CWCO/07).

2.10 Core Policy 43 itself states:

"The provision of affordable housing may vary on a site-by-site basis taking into account evidence of local need, mix of affordable housing proposed and, where appropriate, the viability of the development".

2.11 It is also worth noting, paragraph 6.45 of the supporting text, which states:

"The approach set out in Core Policy 43 will provide both certainty to the market and sufficient flexibility to allow development proposals to accommodate variations in scheme costs while still meeting the policy requirements of the plan."

This is an important qualification as the evidence of need, mix and viability will be assessed in detail at the time of the application not at the point of preparing the development plan when deliverability and policy compliance are considered based only on a broad set of assumptions and standardised costs.

The scale of delivery of affordable housing

2.12 At Paragraph 10 of his Initial Appraisal, the Inspector concludes his consideration with the concern that the CSAP may not comply with an objective of the WCS to deliver 13,000 affordable homes within the plan period.

2.13 The sites proposed for allocation within the CSAP (Policies CH1, CH2 and CH3), are for 2,350 homes within the remainder of the plan period, which implies a target of 940 affordable homes (40% of 2,350). To comply with the WCS objective to contribute to a target of 13,000 affordable homes, the CSAP should be expected to provide 774 affordable dwellings (40% of 1,936 in accordance with Core Policy 43).

2.14 A Viability Assessment carried out on behalf of the Council by BNP Paribas (BNPP), the Chippenham Site Allocations Plan: Strategic Site Viability Assessment, (VA) (CEPS/17) suggests a lower range of 555 to 790 homes and this is the reason for the Inspector's concern. Nevertheless, this range does encompass the target scale of affordable homes expected by the WCS of 774.

2.15 Taking the VA results at face value, the CSAP does therefore match up to the key strategic objective of achieving a policy compliant scale of affordable housing. It is effective in being able to deliver the anticipated number of affordable homes and complies with the relevant objective of the WCS.

Viability Assessment and Core Policy 43

2.16 Paragraph 7 of the Inspector's Initial Appraisal refers to a statement in the VA and this appears to be the single, main reason for concern. The VA says at paragraph 7.1.3:

"The results generated by these appraisals indicate the sites can viably provide the required strategic infrastructure costs, CIL, and S106 obligations. However with the exception of South West Chippenham the sites do not currently support a policy compliant level of affordable housing"

2.17 The VA , has been undertaken in response to the National Planning Policy Framework, which requires that *"the sites and scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened"* (paragraph 173, NPPF). It cannot provide an accurate forecast of how many affordable homes the Plan will deliver. The VA, however, gives an indication of policy compliance and these are based on assumptions contained in those appraisals

2.18 The primary purpose of the VA, however, is to test the deliverability of the CSAP's proposals and not to predict numbers of dwellings. The VA therefore uses the most testing assumptions to verify the feasibility and reasonableness of proposals.

2.19 The VA goes on to conclude that:

"Our assessment makes broad judgements and assumptions using industry guides and generally toward the least optimistic in terms of costs and values... Even so, our high level assessment of the sites demonstrates deliverability and provision of greater clarity in respect of detailed scheme proposals may serve to improve results"

(Paragraph 7.1.8, CEPS/17)

2.20 Evidence on viability for CSAP shows that the Plan satisfies the central test set for it - that policies are deliverable when taking into consideration the flexibility intrinsic within Core Policy 43 (see Paragraphs 2.9 to 2.11 above).

- 2.21 By using pessimistic assumptions for costs and values it follows that appraisals indicate lower proportions of affordable housing. Less pessimistic assumptions suggest higher levels of affordable housing can be achieved. It should also be noted that WCS Core Policy 43 is necessarily flexible and aspirational, which is considered below.

Using less pessimistic assumptions

- 2.22 Section 4.3 of the VA, recognises that there is very little information available on recent new build housing values in Chippenham. The VA assumes a 4 bed house has a value of £280,000. The sensitivity analysis in Chapter 6 of the VA report shows that sites are much more capable of achieving a 40% proportion of affordable housing in a scenario of a 5% increase in costs and a 10% increase in sale value.
- 2.23 The VA however reports evidence of a new build 4 bed semi-detached house for sale at £340,000 in Chippenham (para 4.3.5, VA); a figure that is more than 20% higher than the one used for the assessment (paragraph 4.3.7, VA).
- 2.24 The VA also goes on to explicitly state that "...benchmark land values have a significant influence on the level of affordable housing that each site can support. Assumptions about owners' expectations of land value make a large difference in terms of viability" (paragraph 7.1.7, VA). In the knowledge of the considerable infrastructure costs involved with the development of a large mixed-use site, it is reasonable to consider that cautious and realistic option agreements would reflect the lower end of the range (£0.250m) and this in itself suggests both a greater certainty over deliverability and a greater commercial scope to achieve affordable housing as a part of a detailed scheme.
- 2.25 The VA is based on a broad set of assumptions to demonstrate deliverability of each strategic site. It was prepared at a specific moment in time using national benchmarks in many cases rather than Chippenham specific information. This is entirely appropriate to support plan making. As the sensitivity testing within the VA small variations can have a significant influence on the outcomes. The actual affordable housing to be delivered will be negotiated at the time of application based on actual local costs and circumstances.

The aspirational basis for Core Policy 43

- 2.26 The Inspector considering the WCS recognised in his Report that:

"The CS can reasonably be aspirational but must also be capable of effective delivery."

(Paragraph 105, CWCO/07)

- 2.27 The CSAP approach to affordable housing is also both aspirational and capable of delivery. Achieving a level of 40% can only ever be certain when more information is known at detailed planning application stages. Implicit is also a recognition that Chippenham has a less certain position as a part of a 40% zone compared to other

places and therefore the policy must include a degree of aspiration (See paragraph 2.8 above). Evidence on viability for delivery of the CSAP is consistent with the levels of certainty found sound and satisfactory at the adoption of the WCS and follows the approach the WCS sets. Flexibility was introduced to acknowledge that market conditions and specific local circumstances will have to be taken into account. Indeed paragraph 6.43 of the core strategy states:

“The provision of affordable housing linked to open market housing development must be realistic, with regard to economic viability, but flexible to variations between sites and changes in market conditions over the plan period.”

This approach is part of the normal planning process.

- 2.28 As recognised at paragraph 1.1.7 of the VA, the assessment necessarily includes a number of broad assumptions. It goes on to acknowledge that:

“When planning applications are submitted there can be detailed assessments for each individual strategic site. This is the point at which scope for affordable housing could be considered more definitively as at this stage assessments can look more accurately at known site costs and development values.”

- 2.29 The Council will seek to achieve its affordable housing target over the Plan period and there do not appear to be insurmountable barriers to Chippenham making an appropriate contribution, as envisaged in Core Policy 43.

Sustainability Appraisal (CSUS/02)

- 2.30 At Paragraph 6 of his Initial Appraisal, the Inspector questions whether the Sustainability Appraisal (SA) is correct to conclude that the CSAP has positive effects in terms of providing everyone with the opportunity to live in good quality affordable housing (Objective 8 of the SA).

- 2.31 This SA judgement is however reasonable given Objective 8's definition in the SA framework and the decision aiding questions, as follows:

1. *Provide an adequate supply of affordable housing?*
2. *Provide housing in sustainable locations that allow easy access to a range of local services and facilities?*
3. *Support the provision of a range of house types and sizes to meet the needs of all sectors of the community?*
4. *Ensure adequate provision of land to meet housing needs?*

(Page 83, SA Report, CSUS/02)

- 2.32 The objective touches on different aspects of housing such as location, size and types, access to services and reference to the settlement hierarchy as well as affordable homes. The judgement is made balancing the range of effects on all of them.

- 2.33 The SA recognises that:
"In combination, the effects are likely to be considerable given that the policies provide a substantial quantity of dwellings, thus helping the Council meet its target."

(Page 146, SA Report CSUS/02)

- 2.34 Based on the considerations above the Council considers that there is no discrepancy between the VA and SA with respect to affordable housing.

Conclusions on policy compliance with respect to affordable housing - Point 1, Paragraph 20, Inspector's Initial Appraisal

- 2.35 On the least optimistic appraisal assumptions, the CSAP is capable of delivering the scale of affordable housing it is expected to deliver to meet the WCS target of 13,000 homes.
- 2.36 The purpose of the VA is to test the deliverability of CSAP proposals and not to forecast affordable housing delivery.
- 2.37 The evidence suggests less pessimistic assumptions can quite easily achieve a 40% proportion of affordable homes on each site, but there can be no certainty until detailed costs are known and replace assumptions. This is to be expected and usual. The policy is made deliberately flexible to allow for this uncertainty and so it has to be operated in an aspirational rather than a mechanical manner. The CSAP, on the other hand, has to be robust and certain sufficient to be effective and deliverable in the worst of scenarios and this is what the VA verifies."

3. Eastern Link Road

- 3.1 The Inspector's second concern is that the site allocations strategy has been "*driven by the perceived need for an Eastern Link Road*" (ELR), as set out in Paragraph 20 (2) of his appraisal:

"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."

- 3.2 The Inspector's reasons for his concern are set out in paragraphs 11 to 14 of his Initial Appraisal.

- 3.3 The site allocation strategy development strategy for Chippenham has been led by the evidence, as set out in the Site Selection Report, CSAP/03. The approach uses evidence across all the aspects of the six criteria contained in Core Policy 10 of the WCS. This is summarised in Briefing Note 1 (CEPS/12). Evidence Paper 3 on Transport and Accessibility (Parts 1 and 2, CEPS/04 and 05) therefore represents one element of the evidence base underpinning the Plan; the others being economy, housing and community, landscape, flood risk and surface water management and biodiversity. The preferred strategy is based on a balance of all this evidence.

Context

- 3.4 Part 1 of the Transport and Accessibility evidence helped to inform the choice of preferred strategic areas. Part 2 of the Transport and Accessibility evidence helped determine site options within the preferred strategic areas. Area D was excluded from this stage of the process (Part 2) as it had not been selected as a preferred strategic area.
- 3.5 At Paragraph 12 of the Initial Appraisal, the Inspector refers to the Transport and Accessibility Assessment (Part 2) where it draws on conclusions reached in Part 1 of the Assessment. It is important to set these quotes into context. As the Transport Assessment states at paragraph 4.3:

"The recommendations are not endorsements for developments of the sizes stated, as the suitability of any given development will depend on the access arrangements proposed and wider consideration through the statutory planning process. The overall development strategy will depend on the conclusions drawn from across the full range of economic, environmental and social assessments being undertaken in parallel by Wiltshire Council".

- 3.6 Large scale mixed use development at Chippenham needs to have an acceptable impact upon the local road network and can offer wider transport benefits to be in accordance with core policy 10 of the WCS. Specifically Criteria 3 of Core Policy 10 of the WCS requires that strategic development:

"Offers wider transport benefits for the existing community, has safe and convenient access to the local and primary road network and is capable of redressing transport impacts, including impacts affecting the attractiveness of the town centre."

Criteria 4 of Core Policy 10 relates to non-car transport. Transport evidence to support the development of the CSAP is therefore needed to address both requirements.

Selection of Preferred Areas and Strategic Sites

- 3.7 Evidence Paper 3 on Transport and Accessibility (Part 1) considered three scenarios to address the question of wider transport benefits to Chippenham as part of the high

level first assessment of strategic areas (Paragraphs 7.9 - 7.11, CEOS/04) . These were:

1. Dispersed growth across the 5 strategic areas (Scenario 1)
2. A north eastern focus with new infrastructure to link strategic areas A, B and C (Scenario 2)
3. A southern focus with new infrastructure to link strategic areas D and E (Scenario 3)

3.8 The conclusion, at paragraph 7.11 of the review, was:

“Scenario 2: A north/east development focus, with eastern link road, is forecast to lead to average journey times which are approximately 30-50% shorter than journey times under Scenario 1, or 15-20% shorter than under Scenario 3. Time spent queuing on approaches to The Bridge Centre is also forecast to be considerably lower than it is under both Scenarios 1 and 3”

(Paragraph 7.11, CEPS/04)

3.9 The conclusions lead to the view that a road linking the A4 to the A350 in conjunction with the town's expansion provides better impacts than dispersed growth without such a link. The report states:

“It would be possible to capitalise on the dependencies which exist between strategic areas A, B and C to deliver growth and supporting infrastructure which is more advantageous, in transport and accessibility, than completely dispersed growth”.

(Paragraph 7.13, CEPS/04)

3.10 This factor has been weighed in the balance of considerations when the Council selected preferred areas for strategic sites based on all the Core Policy 10 criteria. In so doing, as the evidence suggests it has taken into account the greater benefits that accrue from an eastern route compared to a southern one and conclusions earlier in Part 1 if the Transport and Accessibility evidence that Areas A and E demonstrate the most favourable attributes across all transport themes (CEPS/04, figure 7.1).

3.11 The recent Information Event held in Chippenham held to explain further the transport evidence supporting the CSAP included a presentation confirming the reasons for preferring an eastern over a southern link road (CTAN/02). This confirms that the modelling work suggests a 10% reduction in vehicle numbers within the town centre with an Eastern Link Road (ELR) compared to a 4% reduction with a southern link road. It also suggests increased delays on the A350 and to the north of the town centre with a southern link road compared to an eastern link road due to the need for traffic to still cross Chippenham to access the A350 corridor. Appendix E (CEPS/05) illustrates the relative benefits to the highway network with a completed ELR compared to the network without this infrastructure improvement.

3.12 Proposals have not been formulated based on the best means to deliver one or other of the road links. Preferred strategic areas have been selected with transport

benefits and impacts as one factor in the balance of all the considerations set by the criteria in Core Policy 10. Site allocations have not been driven by a 'perceived need to complete an Eastern Link Road' but by the published methodology, as explained in the Site Selection Report (CSAP/03) and Briefing Note 1 (CEPS/12).

- 3.13 The development strategy for the Plan does, ultimately, include proposals for an ELR which is delivered incrementally through the allocations and particular thresholds, expressed in dwelling numbers, by which sections of the ELR and the Cocklebury Link Road need to be provided. These thresholds follow the evidence of traffic impacts described in Part 2 of Evidence Paper 3 as illustrated in Figure 4.1 and explained in Table 3.2 (CEPS/05). Like with other proposals, this evidence suggests that traffic impacts of developing South West Chippenham should be managed, as unacceptable impacts on the highway network may occur if development proceeds beyond 800 dwellings without the ELR having been completed. The purpose of such thresholds is to maintain the proper functioning of the local highway network and it is justified by evidence from traffic modelling of the network.
- 3.14 The ELR is the cumulative result of roads necessary to support individual strategic sites. A function of the Plan is to link them as anticipated in the WCS when reference to made to solving strategic infrastructure issues (criteria 3, Core Policy 10, WCS). The ELR is one part of a preferred pattern of sustainable development which involves balancing a number of dimensions and roles for the Plan (NPPF paragraph 7); it is not in itself a policy objective of the Plan.
- 3.15 As the Inspector has identified at Paragraph 11 of his Initial Appraisal there is no specific section of the Plan which provides the case for the road, instead elements are referred to in the development strategy (paragraph 4.23) and individual policies (Policy CH2- Rawlings Green and paragraphs 5.17-18, Policy CH3 - East Chippenham and paragraphs 5.30-31). Instead the justification is explained in the supporting evidence. It is therefore suggested that to add clarity to the Plan new supporting text and policy could be inserted based on the published evidence, as set out at Appendix 1.

Costs and Timing of the ELR

- 3.16 At Paragraph 13 of his Initial Appraisal, the Inspector says that:

“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.

- 3.17 The Council does not consider that it is inevitable that there will be an impact on affordable housing as a consequence of the costs of the ELR. The cost of the ELR is

included in the VA of each site. The VA merely indicates the consequences of a possible 'worst-case scenario'. Thresholds for road construction are necessary to protect the functioning of the road network and are justified by traffic modelling identifying impacts arising from traffic growth associated with the development of each strategic site.

Costs

- 3.18 The cost of site specific strategic transport links has been taken into account in the VA at Table 4.7.7 (Page 14, (CEPS/17). The cost of new road infrastructure at the East Chippenham site was estimated at £8.856m. This estimate was to enable a link road and river crossing to be delivered by the developer as part of the development. The Council took into account costs prepared by the prospective developer independently of the Council which included an overview and thorough report cost appraisal.
- 3.19 The Inspector at Paragraph 15 of his Initial Appraisal also refers to the additional works to ensure that the new bridge does not impede water flows. The design of the bridge will require Flood Defence Consent from the Environment Agency as well as planning consent from the Local Planning Authority. A contingency for this is factored in to the overall estimate included in the VA report.
- 3.20 The Inspector refers to the North Chippenham master plan at Paragraph 11 of his Initial Appraisal and the way it represents the northern section of the ELR. It is important to understand the nature of the proposed road - it is not to be part of the Primary Road Network. Instead it is to be built to standard carriage way widths involving two lanes and will be a minor upgrade to what is considered to be a standard distributor road to serve a new development. The North Chippenham site needs to improve access to its site through a distributor road on its northern boundary which will form the first phase of the ELR. A road of this nature should not compromise the function of the cycle route. Crossing the cycle path is, therefore, not viewed as an abnormal cost but part of reasonable build costs when roads of this nature are constructed.
- 3.21 The costs for the ELR do not include a bridge crossing for the North Wiltshire Rivers Route. Whether a bridge may be provided will not be known until more detailed design has been undertaken and the levels and alignment of the ELR are fixed, however it is not considered necessary on road safety grounds to keep the two routes separate.
- 3.22 Construction costs above normal have, therefore, already been factored into the VA. For the reasons given in answer to the first of the Inspector's concerns there is reasonable prospect of the CSAP delivering the scale and levels of affordable housing envisaged in the WCS.

Timings

- 3.23 Tables 3.1 to 3.2 of Part 2 of Evidence Paper 3 show various scenarios during the development of the proposed strategic sites and its traffic impacts on the network, such as the increase in journey time that will result from different scales of development. The timing of different sections of the ELR and Cocklebury Link Road are set at points where further development without those sections will result in significant traffic impacts. For example, an increase from 800 to 1,200 dwellings in Strategic Area E leads to almost a 20% increase in morning peak hour average journey times. This leads to the recommendation that higher levels of development in Strategic Area E should not take place alongside development in Strategic Areas B and C, without a completed ELR.
- 3.24 This recommendation is transposed into a policy requirement in Policy CH1. The approach is to protect the proper functioning of the local network, in accordance with Criteria 3 of Core Policy 10 and is not justified in a way that can reasonably be described as “*skewed to ensure the phases of the road proposal can be delivered without undue delays*” (Paragraph 13, Inspector's Initial Appraisal).

Chippenham Transport Strategy and Infrastructure Delivery Plan

- 3.25 The Inspector in paragraph 14 of has drawn attention to the May 2013 Chippenham Transport Strategy (CTS), (CTAN/01) and the Wiltshire Infrastructure Delivery Plan: Chippenham Extract of September 2013 (CWCO/06) in his letter at paragraph 14. The CTS strategy), and the background work, supports the previous pattern of development and a lower scale of growth of 4,000 homes proposed in the WCS at that time. The Council is in the process of refreshing its Transport Strategy for Chippenham and intends this to be published for submission before the forthcoming hearings. Consequently, the refreshed strategy will take account of the CSAP proposals for around 5,000 homes over the plan period.
- 3.26 Similarly the Chippenham extract of the IDP was prepared to support the proposals in the WCS. The IDP is an iterative document which is to be updated during the Plan period and is being updated to relate to the demands of the CSAP. It will continue to contain cost estimates in relation to new road infrastructure at Rawlings Green (previously referred to as East Chippenham, Rawlings Green) but will also include costings for road links proposed within the East Chippenham Strategic site and update the requirements relating to the South West Chippenham site.

Conclusions in relation to the justification for the Eastern Link Road - Point 2, Paragraph 20, Inspector's Initial Appraisal

- 3.27 The Council's position is that the development strategy for Chippenham has been led by the evidence (as set out in the Site Selection Report, CSAP/03). The iterative approach to using the evidence across all themes presented in Core Policy 10 of the WCS is summarised in Briefing Note 1 (CEPS/12). The potential benefits of an ELR were part of this iterative process not a decisive factor.
- 3.28 Estimates of costs for new road construction have been included in the VA to ensure that the proposed allocations are deliverable. The Council consider that they are

appropriate to support plan making and will deliver development that responds to the overarching requirements established in the WCS.

4. Environmental Considerations

- 4.1 The third area of concern raised by the Inspector in his Initial Appraisal at paragraph 20 (3) is as follows:

“It is clear that the over-allocation of both housing and employment is driven primarily by the need to support the eastern part of the ELR. This appears to ignore significant and legitimate environmental, landscape and flood risk concerns which would suggest the inclusion of the housing allocation to the North Wiltshire Rivers Route and the larger of the two employment allocations intended for development beyond the Plan period are unsound.”

- 4.2 Paragraphs 15 to 19 set out the Inspector's considerations around this matter, which are discussed in turn below.
- 4.3 The levels of growth proposed in the CSAP are justified on their own terms and are not justified by the need to support any part of the ELR. To enhance Chippenham's resilience and growth prospects, land is needed for employment to ensure a continuity of land supply for jobs and business. The additional amounts of land proposed over the WCS indicative scale of growth do not bring about development north of the North Wiltshire Rivers Way.

Justification for proposed scales of development

Housing

- 4.4 An overarching aim of both the WCS and CSAP is to provide a significant boost to the supply of housing at Chippenham. The WCS housing requirement for Chippenham is 'at least 4510 homes' delivered over the period 2006-2026. As recognised by the Inspector at Paragraph 15 of his Initial Appraisal and illustrated in Table 6.1 of the CSAP, the proposals in the CSAP will result in the delivery of 2,350 homes by 2026, with 150 homes beyond the plan period (2026 to 2028). Taking into account existing housing completions and commitments as set out in the housing land supply data at 1 April 2014 this means that 4,925 homes will be provided at Chippenham within the Plan period. This would amount to an oversupply of less than 10% or about 12% if the supply to 2028 is considered. In the context of 'at least 4510' this scale of additional growth proposed is considered to be reasonable and provides contingency to ensure the delivery of 'at least 4,510' homes over the Plan period.
- 4.5 In preparing the CSAP, the Council was mindful of three significant factors relating to housing at Chippenham:

1. The scale of growth was set to an indicative level that was considered realistically capable of delivery in the plan period solely in order to ensure sufficient land supply across the HMA as a whole. The WCS does not prevent a scale of development in excess of this level and expresses strategic requirements in terms of 'at least' 4,510 homes;
2. A slow rate of growth that has occurred at the town since the start of the Plan period, with only 995 homes delivered over the period 2006 to 2014 or approximately 125 homes per annum (Table 4.1, CSAP) . The Plan provides a buffer of land supply in the region of about 10% in order to provide a realistic prospect of achieving the planned supply and to ensure choice and competition in the market for land; and
3. Under provision at Chippenham is having an impact on nearby market towns where there has been additional pressure for housing. Over time this could undermine the sustainable settlement strategy within the WCS which is to focus growth at the Principal Settlements, supported by the market towns (Housing Land Supply Statement August 2014, CHSG/01).

Employment

- 4.6 The three strategic sites within the Plan, as recognised by the Inspector in his Initial Appraisal at paragraph 16, provide for 28ha of employment land in the plan period against a residual requirement of 21.5 ha. However, this does not equate to an “*over-provision of some 30%*” as suggested. The employment strategy for the Plan is discussed in more detail below.
- 4.7 The WCS firmly establishes that the Plan's approach for Chippenham should be employment led.

“The strategy for Chippenham is based on delivering significant job growth, which will help to improve the self-containment of the town by providing more jobs for local people. To ensure employment is accessible to the local population, a sustainable distribution and choice of employment sites will be provided at the town.”

(Paragraph 5.46, WCS, CWCO/01)

- 4.8 The CSAP has responded by identifying a choice of employment land at each strategic site. As with housing there has been a limited supply of new employment land in Chippenham in recent years. The Swindon and Wiltshire Local Enterprise Partnership identify the town as part of the A350 growth zone (CECON/O1) and pressure for inward investment as well as business retention illustrates the importance of supply. Evidence Paper 1 - Economy provides evidence of the ongoing demand for sites in the town (CEPS/01).
- 4.9 The sites promoted to be developed in the Plan period for traditional, B class employment uses amount to 23ha - 18 ha at South West Chippenham and 5 ha at East Chippenham for delivery in the Plan period. This employment land is explicitly

referred to in Policies CH1 and CH3 as being for “B1, B2 and B8 uses of the Use Classes Order”.

- 4.10 The further 5 ha employment land is allocated for ‘employment generating uses’ at Rawlings Green, which is explicitly referred to in Policy CH2 as uses within “B1, B2, C2, D1 and D2 of the Use Classes Order”. This is because the Rawlings Green site has different employment generating potential given its proximity to the town centre and unsuitability for large industrial buildings (paragraph 5.14, CSAP). Policy CH2 therefore permits C2 (residential institutions), D1 (non-residential institutions) and D2 (assembly and leisure) uses to be provided within the employment land identified.
- 4.11 When the overall WCS employment requirement of 178 ha (Core Policy 2, WCS) was established this related to the land required to deliver traditional class B employment (business, general industry and storage and distribution). However, the anticipated growth in jobs over the Plan period also included the growth of service industry and non-traditional employment jobs that will not be accommodated on such land. The Rawlings Green site anticipates the demand for such developments.
- 4.12 The specific allocations on face value therefore appear to seek to deliver 28 ha of land against the residual requirement of 21.5 ha (Table 4.2, CSAP), whilst in reality the extent of traditional B class uses on the Rawlings Green allocation is unknown and may result in less than 28 ha dedicated to traditional employment.
- 4.13 Paragraph 16 of the Inspector’s Initial Assessment suggests there is an anomaly in the Plan in relation to the employment sites for the East Chippenham Strategic Site: “...at para 5.20...*the smaller is intended to meet needs within the Plan period, whilst the larger is safeguarded for development “...focusing 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 Inspector then goes on to note in relation to the timing of the safeguarded employment land that its development “...is seen as depending upon the road connection to the A350 by completion of that part of the ELR”.
- 4.14 The Plan anticipates the long term attractiveness of a new business location at East Chippenham by safeguarding 15ha of land for employment beyond 2026. This is to avoid a repeat of the recent situation where there is very little planned employment growth beyond the Plan period and retains this opportunity for discussion as part of a planned review and roll forward of policy in Chippenham. It is an ambition of both the WCS and community plan to create resilient communities which relies on job growth commensurate with housing: safeguarding employment land at this stage supports this ambition. While it is likely that its development would be post 2026, paragraph 5.20 could be amended to make the policy and supporting text more consistent to say that:

“a second larger area is safeguarded for development focusing on needs up to and beyond 2026 unless specific proposals for inward investment appropriate to Chippenham come forward that cannot be accommodated on existing and other employment sites.”

- 4.15 The CSAP assumes the attractiveness of the second employment site depends upon the completion of a link to the A350 and not necessarily the full Eastern Link Road (paragraph 17.8, Site Selection Report). Table 6.1 indicates that this could happen between 2020 and 2026, the period during which it is expected that the link to the A350 will be completed.
- 4.16 The justification for the additional employment land and safeguarding is set out at paragraphs 17.6 and 17.7 of the Site Selection Report.

East Chippenham (Policy CH3): North of the North Wiltshire Rivers Way

- 4.17 The Inspector's Initial Appraisal is concerned about the impact of any '*over-provision in terms of location*' in the case of both employment and housing and in particular the part of the allocation to the north of the National Cycle Route, the North Wiltshire Rivers Route (paragraph 17). Paragraphs 18 and 19 clarify the nature of these concerns in relation to landscape impact and flood risk.

East Chippenham (CH3)

- 4.18 The Site Selection Report (SSR) describes the process by which each of the preferred areas was selected in turn (CSAP/03). The method applies the six criteria established by Core Policy 10 of the Core Strategy. Towards the end of this process, a third preferred strategic area was required which involved undertaking a comparison of Area C with the remaining opportunities (paragraphs 14.1-16.10, SSR refers). Although Area C is recorded as ranking least in terms of flood risk, the SSR considers it to have relatively better performance in relation to landscape, wider transport benefits, comprehensive management of the riverside environment and improved sustainable transport access to the town centre via the river corridor than other remaining options. Despite the flood risks the SSR also recognises the opportunities offered by new development in Area C to reduce the causes of flood risk in accordance with national policy (paragraph 100, NPPF, SSR paragraph 16.6)
- 4.19 All allocations have the potential to increase flood risk hence the requirement to provide '*surface water management that can achieve less than current Greenfield rates of run-off and decreases flood risk*' in each allocation policy (Policy CH3, CSAP - repeated in Policy CH2 and CH1). The additional text in paragraph 5.19 (as amended by Proposed Change 44) in relation to East Chippenham clarifies the nature and timing of surface water management measures.
- 4.20 Evidence Paper 6 'Flood Risk and Surface Water Management' (CEPS/10) compares the strategic areas and ranks their suitability for development in terms of surface water management and flood risk. The SSR considers this evidence and notes that measures "*may be more likely to be complex and time consuming because of the particular risks attached to this area even if the scale, for and cost of the measures required is ultimately much the same as other areas*" (paragraph 16.4.). There is no indication that a good solution is not deliverable.

- 4.21 All proposals will inevitably have a marked visual impact on the landscape and this is expressed in Evidence Paper 4 – Landscape Assessment (CESP/06 and /07), hence the requirement for a Landscape and Visual Impact Assessment as part of each master plan process. Overall, particular landscape impacts, however, do not constitute an absolute barrier to development of a strategic site in Area C. However, this is not to say that more sensitive areas are not properly recognised or treated. In relation to East Chippenham, there is relatively detailed advice included in the Plan at paragraphs 5.22-5.24.

North of the North Wiltshire Rivers Way

- 4.22 Policy CH3 allows less than half of the allocation to be developed before a river bridge and connection to Rawlings Green (Policy CH3 2nd requirement). The area of land North of the North Wiltshire Rivers Way will not therefore be the final section of the ELR. There is no direct trade-off between this specific area of land and exceeding WCS indicative scales of development.
- 4.23 The indicative plan (Figure 5.3, CSAP) is not definitive. Instead the mix and distribution of land uses will be determined through the master plan process associated with a subsequent planning application - as required by Policy CH3. The 'indicative plan' does however reflect the site promoters intention to have housing development coming forward from two access points during the plan period – one served from the A4; the second from the Eastern Link Road once the river bridge is complete to aid in the viability of the scheme. This accords with policy CH3.
- 4.24 In the context of the CSAP, land to the north of the North Wiltshire Rivers Route is not a separate isolated allocation. It is part of a comprehensive treatment for the whole of this part of the CSAP proposals. It is though one of several areas around Chippenham assessed as '*an area where development would be more difficult to accommodate*' (TEP A3 proforma, (CEPS/08). However, even though the land north of the North Wiltshire River Route is not subject to any specific landscape designations, the Plan aims to minimise the scale of development north of the North Wiltshire River Route and includes the need for lower density development recognising the constraint that applies to this part of Area C. This could be included within policy if it would aid clarity. However, the evidence establishes that much of the remainder of the strategic site is much less constrained in terms of its visual impacts.
- 4.25 The land uses shown in Figure 5.3 of the CSAP are indicative only. A final masterplan is not constrained by this illustration and may not promote development for housing North of the North Wiltshire Rivers Way. Detailed landscape visual impact assessment as part of the master plan process for the site may propose alternative internal layouts within the site boundaries. The only CSAP requirement for this part of the site is to make the road connection with a minimum amount of visual impact.
- 4.26 This is justified in transport terms by evidence that suggests that developing more than 1,200 homes across areas A, B and C without supporting road infrastructure

would increase journey times on average by 31% across the network (Table 3.2, CEPS/05). This represents a considerable delay and would undermine WCS objectives to improve the resilience of the town by, for instance, harming the attractiveness of the town to prospective employers. Investment in road infrastructure, therefore, is part of the solution. A Cocklebury Link Road provides a marked benefit, but as the scale of growth in Areas B and C increase to deliver the indicative levels set in the WCS, this benefit wanes. At these greater scales it would appear that an Eastern Link Road provides the most benefit (Table 3.2, CEPS/05). This was a factor in the comparative assessment including the consequential impact on the attractiveness of the town to employers.

Conclusions in relation to the environmental impact of the over allocation of housing and employment, and delivery of the ELR - Point 3, Paragraph 20, Inspector's Initial Appraisal

- 4.27 There are clear justifications for the scale of proposals in the Plan to exceed the 'at least' floor set in the WCS. There is an historic under provision of housing land for which sites are needed to compensate. The poor growth of Chippenham, despite it being a Principal Settlement, is diverting development pressures to less suited areas, with the costs and harm this involves, coupled with the potential to undermine the WCS Spatial Strategy for a sustainable pattern of development if not fully and comprehensively addressed.
- 4.28 Growth at Chippenham needs to be employment led, which includes providing a long term supply of developable land for employment uses. East Chippenham, as a location that will be linked directly from the A4 to the M4, provides an attractive location that represents a realistic alternative that relieves direct pressure on the A350 to the west of Chippenham. It is reasonable for a strategic site of the scale proposed to make a positive contribution to the Town's longer term sustainable development.
- 4.29 In this context, by comparison to remaining areas, Area C provides justified and effective proposals that secure the long term role and function of the Town. Correct requirements and safeguards have been put in place to manage any potential impacts on flood risk and the wider landscape. The final relationship of land uses within each site will be developed through the master plan process informed by site specific landscape and visual impact assessment, heritage assessment, biodiversity report, surface water management plan and flood risk assessment.

28 September 2015