

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

**MATTERS TO BE EXAMINED BY WAY OF PUBLIC HEARINGS**

**Introduction**

*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 the matters to be examined, including at the planned hearing session. They are based on my consideration of the Submission Chippenham Site Allocations Plan, together with the Council's Proposed Changes, 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**

**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 satisfactory regard been had to the Sustainable Community Strategy?
- 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**

**Issues**

- Has the selection process resulted in the most appropriate Development Strategy?
- Has the ranking of the Core Strategy criteria been properly justified?
- Does the narrative for selecting the preferred strategic areas properly reflect the relative weight of the Core Strategy criteria?

- Has the balance between the assessment against the Core Strategy criteria and the results of the Sustainability Analysis resulted in the most appropriate proposals for including in the CSAP?

### **Matter 3 – Sustainability Appraisal Issues**

- It is a requirement that the Sustainability Appraisal should be adequate: does the methodology provide an adequate framework for assessing the sustainability of the alternative strategic areas?
- Does the high level nature of the first assessment provide adequate justification to exclude Area D from further consideration?
- Has sufficient consideration been given to the options included for the second assessment?
- Are the results robust in the absence of any weighting of SA objectives?
- As an example, Area D is summarised as having significant adverse effects on air pollution and noise, performing worse than Area C against SA Objective 4, yet the detailed assessment tables have almost identical wording: does this indicate that the results are not robust?

### **Matter 4 – Transport and Accessibility Issues**

- Does the evidence provide a convincing case for an Eastern Link Road?
- Is there sufficient evidence to justify a development strategy based to a significant extent on performance in terms of transport and accessibility?
- Has there been adequate justification in transport and accessibility terms to justify exclusion of Area D from the Stage 2 Analysis?

### **Matter 5 – Flood risk Issues**

- Has sufficient regard been had to the flood risk information, and particularly to the surface water management issues identified in the Evidence Paper 6?
- Is the potential impact of infiltration resulting from SUDS a significant concern?
- Has sufficient weight been afforded to the high ranking of the strategic areas (notably B & C) having the most flood risk area and location upstream of the built-up area?

## **Matter 6 – The Development Strategy and Proposals**

### **Issues**

- Does the Development Strategy provide adequate justification for updating the Core Strategy's housing and employment requirement?
- Has the methodology for determining the Strategy been properly justified?
- Does the Development Strategy truly reflect the priority given to new employment provision acknowledged by the Core Strategy and has this translated into an 'employment-led strategy'?
- Is the development strategy too narrowly focussed by omitting consideration of small sites?

## **Matter 7 – Policy CH1**

### **Issues**

- Area E is the first preferred choice: is this fully justified by the evidence?
- Can the choice be robust when delivery of a significant part of the site is dependent on the provision of infrastructure elsewhere and outside the control of the developer?
- Are sufficient safeguards in place to ensure the future protection of the Rowden Park Conservation Area?
- Has there been sufficient consideration of the environmental issues regarding the Patterdown Rifle Range?
- Is the extent of the allocation appropriate?
- The more extensive Option E3 has been rejected: are the reasons for the rejection robust and soundly based?

## **Matter 8 – Policy CH2**

### **Issues**

- Is the necessary infrastructure deliverable to support development of Rawlings Green within the envisaged timescale?
- Has adequate account been taken of the potential harmful traffic impact on congested corridors?
- Has the complexity of the extent and form of risk posed by flood risk zones been fully explored prior to allocation?
- Has sufficient consideration been given to the prominence of the area in the wider landscape?
- Compared to Options B1 and B2, the chosen configuration for the allocation has no specific employment site: is this fully justified by the evidence?

## **Matter 9 – Policy CH3**

### **Issues**

- Area C is acknowledged to bring about a marked change to the setting of the town: how can this be justified?

- Is there robust evidence that the impact of development will be acceptable when it is acknowledged the area is visually prominent over a wide area of countryside?
- How can the flood risks associated with the River Avon in this locality be equated to the extensive development proposed, given the statement that the measures needed have not been investigated in detail?
- Can the area's separation from the town be overcome to any degree by a new road connection across the Avon, given its location and direction?
- The chosen Option allows for a scale of development almost twice that required to meet the balance of the housing requirement: how can this be justified?
- The choice of Area C as the third preferred area appears to be based – to a substantial degree – on the provision of an Eastern Link Road: since it is acknowledged this would, in turn, have the potential to adversely impact on SA Objective 4, has there been sufficient analysis of the consequences of this choice?
- Is the use of the Eastern Link Road to provide a visual boundary to the town properly justified as a concept?
- How can the proposal to include a housing allocation in the acknowledged open landscape to the north of the North Wiltshire Rivers Route be justified?
- Can a substantial allocation of employment land which will not be developed within the Plan period be justified?
- Has any consideration been given to protecting the rural nature of the North Wiltshire Rivers Route?

#### **Matter 10 – Policy CH4**

##### **Issues**

- Does the Policy provide adequate guidance to ensure the provision of the Country Parks?
- Is there adequate identification of the Country Parks areas within the Plan?
- Should the flood risk areas where new buildings or structures are to be prohibited be delineated on the Plan?
- Should key new rights of way and enhanced routes be identified on the Plan?

#### **Matter 11 – Settlement Boundary**

##### **Issues**

- Is the revised Settlement Boundary justified by the evidence?
- Can the exclusion of the strategic site allocations from the Settlement Boundary be justified?

**Matter 12 –Monitoring and Implementation**

**Issues**

- In the light of declining housing completions in recent years is the housing delivery trajectory realistic?
- Does the delivery trajectory reflect realistic rates of delivery for each of the strategic sites?
- Does the Plan include an adequate monitoring framework to ensure delivery of key infrastructure is co-ordinated with development requirements?
- How can the statement that the Viability Assessment concluded the site allocations are deliverable within the current policy context be true when it does not support compliance with the Core Strategy Policy 43 so far as the provision of affordable homes is concerned?

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