



3/12 Kite Wing
Temple Quay House
2 The Square
Bristol, BS1 6PN

Direct Line: 0303 444 5412
Customer Services: 0303 444 500

e-mail: Stuart.liddington@pins.gsi.gov.uk

Economic Development and
Planning
County Hall
Bythesea Road
Trowbridge
Wiltshire
BA14 8JN

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Dear Ms Clampitt-Dix/Ms Gibson

Chippenham Site Allocations Plan (CSAP) – Resumed Examination in Public

I have now given consideration to the responses to the consultation on the Proposed Further Modifications. These emphasise the concerns which the local community have regarding the impact of the Rawlings Green allocation and which, in their view, have not been adequately addressed through the Main Modifications. As you are aware, whilst I have supported the Council's position regarding Policy CH2 and the Rawlings Green allocation as a key component of the CSAP, I have always taken the view that delivery of the development must be coordinated with infrastructure provision so that there is no significant and lasting adverse impact on the existing community. My view is supported by that of the Government, expressed in the NPPF, notably at paras 162, 173 and 177, the last mentioned unequivocally stating that there must be "*...a reasonable prospect that planned infrastructure is deliverable in a timely fashion*".

As a consequence there remain significant soundness issues which must be addressed by amendments to the Main Modifications submitted by the Council in order for the Plan to be found sound. These affect MM12, MM26 and MM34. The amendments address concerns with the access to the Rawlings Green site. I set out my reasons below.

It has become increasingly clear that the link road from the A350 through the North Chippenham proposed development and Rawlings Green (Policy CH2) is a fundamental component of the proposals without which the current congestion in the town centre might unacceptably worsen (the Council's own assessment - MM12, para 4.19 and the statement regarding Objective 3, para 3.8). It follows that the development at Rawlings Green should not proceed without a clear programme of road provision connecting the Cocklebury Link Road through to the A350. The statement in para 5.18, that "*Development of the site requires construction of a completed link road from Cocklebury Road via Darcy Close to Parsonage Way and the B4069*" suggests something which would fall far short of a complete link. These are concerns that were discussed at the hearing sessions.

The question of reliance on new road infrastructure is not new: I raised this as an issue of concern in my letter stating reasons for the suspension of proceedings, 16 November 2015: "*Clearly the chosen reliance on the northern arc (of development) requires a smooth and coordinated progress over the 10 year remainder of the Plan Period.*" In the light of this responses to the consultation make it clear that, in the eyes of the local community, the issue has not been satisfactorily addressed by the Further Main Modifications. In my opinion, their views carry weight.

It appears to me that there is a very real possibility that the development at Rawlings Green will exceed the 200 dwelling limit - triggering the need for the railway bridge - prior to the section of the link road connecting through to the A350 being available. The consequence would be the unacceptable worsening of congestion on routes into and out of the town centre, referred to in para 4.19. The Plan suggests this is expected to be an inevitable short term impact of the proposals. In my view it would not be an acceptable situation for residents of Monkton Park or the town as a whole as a prospect for the longer term. However, currently there is no mechanism included within the CSAP to ensure the smooth coordination of development so that a completed link to the A350 is in place prior to development at Rawlings Green progressing beyond the first 200 dwellings.

The Council has made it clear that, in the event of a developer being temporarily unable to fund the provision of part of a road it would seek to use its ability to resolve any financial imbalances (par 11.7; CTRAN-12) and that in certain circumstances the Council would consider the use of its compulsory purchase powers (para 11.8). In my opinion the Plan should indicate the Council's willingness to play a pro-active role in the provision of the highway infrastructure, including the provision of the new bridge over the railway, to ensure completion of the link road during the first phase of the residential development of the Rawlings Green allocation - in the same manner it proposes for the development of the employment land seen as a key element of the proposals for the Rowden Park allocation.

In addition to the concerns regarding provision of the infrastructure there are two matters relating to the acknowledged impact of the proposed development on the rural and remote character immediately surrounding the site and the need for a strategic landscape scheme. The Council's own Landscape Officer, commenting on the current planning application, stated that "*..the landscape strategy and development parameters fall short of the bold new landscape structure considered necessary to maintain a characteristic well wooded eastern settlement edge*" and considered the proposals were "*..without adequate landscape structure to contain and filter resulting effects*". There is nothing of substance in the current Policy CH2 to address these concerns, and my letter dated 12 October sought to address the issue through textual changes. These have not been incorporated in the Council's proposed main modifications but the matters must be addressed through text within the Policy to ensure the development's impact is subject to satisfactory mitigation.

Lastly, I have noted the Council's revised figures for Table 4.1 following publication of the 2016 Housing Land Supply Assessment and have incorporated these as an amendment to MM10.

I hope the Council will see these as constructive amendments to the Main Modifications to ensure soundness through a smooth progress of development whilst at the same time protecting the existing community and the town as a whole from potential long term adverse consequences. I have, as far as possible, used text provided through the Council's own evidence documents, or arising from discussion at the hearings and they do not, so far as can be foreseen, result in any adverse consequences for interested parties that were not aired fully at the hearings. I also consider it unnecessary to carry out further Sustainability Appraisal prior to their incorporation in the CSAP. However, the Council may wish to discuss the proposed revised Main Modifications with the parties having a direct interest in the Rawlings Green proposed development. In any event I would ask that any comments be forwarded through the Programme Officer by the end of next week, 13 January, so that delay in completion of my report is minimised.

Yours sincerely

Patrick T Whitehead (Inspector)

Textual amendments proposed to Main Modifications

(Amendments are underscored)

MM12.

Para 4.19 Penultimate sentence: "This new road link will continue ~~this new road link~~ through the site to Monkton Park, which would provide a new access route to the A350 for the north of the town avoiding the town centre. It will serve the development itself and relieve current congestion that might otherwise worsen unacceptably on routes into and out of the town centre. It is an objective of this Plan that the route through North Chippenham connecting the B4069 with the A350 be in place before any development commences beyond the first phase of 200 dwellings on the Rawlings Green allocation."

Para 4.21 First sentence: "Development at Rawlings Green involves building new roads in step with development, including completion of a link between Cocklebury Road and the A350, together with the provision of the new bridge over the railway, in order to ensure there are no unacceptable traffic impacts and so that the wider benefits to the network are achieved as soon as possible".

MM26.

Policy CH2

First bullet: "No more than 650 dwellings, including a first phase of no more than 200 dwellings"

Fourth bullet: "A link road from Parsonage Way to the eastern boundary of the site, including connection over the main railway line, and a road to Darcy Close (Cocklebury Link Road) to be completed and open for use as part of the first phase of development"

Fifth bullet: "Strategic landscaping and open space to retain and reinforce existing hedgerows and establish new areas of substantial planting, including strong groups of new tree planting along the lower eastern edge of development, in accordance with the principles set out at paragraph 5.12"

Sixth bullet, final sentence: "No new buildings should be located in the Country Park unless they are ancillary to the use of the Country Park, or to the east of the 50m contour

New sub paragraph 3: "Development beyond the first phase of 200 dwellings shall not commence before the link road to the A350 is open for use or a set of comprehensive transport improvement measure of equivalent benefit is in place"

MM34.

Para 5.18b last sentence: “Development of the site requires construction of a completed link road from Cocklebury Road via Darcy Close and a new bridge over the railway to Parsonage Way and the B4069 as an essential part of a first phase of development. The link road from the B4069 to the A350 must also be open to traffic prior to development commencing beyond the first phase of development of the Rawlings Green site.”

Para 5.18e new final sentence: “In implementing the Plan the Council will monitor the delivery of the necessary infrastructure to ensure that development comes forward in a timely and co-ordinated fashion. It will, with its partners, play a pro-active role in partnership with the developers to ensure completion of the link road to the A350 and railway bridge. It will use its powers, including its ability to resolve any financial imbalances, for example by providing early funding to accelerate the provision of infrastructure or in circumstances where delivery is significantly delayed and there are no other options, by using its compulsory purchase powers”.

MM10

Amend table 4.1 as follows:

Table 4.1 Chippenham Housing Land Supply at April ~~2014~~2016

Core Strategy Requirement	Completions 2006- 2014 <u>2016</u>	Commitments April 2014 <u>2016</u>	Residual Requirement
4510	995 1135	1580 1715	1935 1661

Source: Wiltshire Housing Land Supply Statement April ~~2014~~ 2016 (~~July 2014~~November 2016).