



Chippenham Site Allocations Plan

Report of Proposed Further Modifications Consultation October – December 2016

May 2017

Wiltshire Council

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1. Introduction

- 1.1 A number of changes to the draft Chippenham Site Allocations Plan were consulted on in the Summer 2016 and put before the Inspector to inform hearings held as part of the Plan's examination between 27 September and 4 October 2016. As a consequence of the hearing sessions further changes were proposed to the draft Chippenham Site Allocations Plan. It was those changes that were the subject of consultation and an accompanying addendum to the Sustainability Appraisal Report.
- 1.2 All the information that has been published is available on the Council's website at <http://www.wiltshire.gov.uk/planninganddevelopment/planningpolicy/chippenhamsiteallocationsplan.htm>
- 1.3 Representations on the proposed modifications were invited over the 6 week period from the 31 October to 12 December 2016. This document provides a summary of the process of consultation and the consultation responses. It highlights new issues that have been raised.
- 1.4 All representations to the proposed modification were forwarded to the Inspector for his consideration and will be considered alongside those already submitted.

2. Process of Consultation

- 2.1 The consultation on the Chippenham Site Allocations Plan pre-submission draft ran from 9am on Monday 31 October and closed at 5pm on Monday 12 December 2016.
- 2.2 Everyone on the Chippenham Site Allocations Plan contact list (composed of those who had previously commented on the Chippenham Site Allocations Plan and those who advised they wanted to be kept informed of the Plans progress) were sent an email/letter informing them of the consultation.
- 2.3 Approximately 828 emails and 191 letters were sent out to consultees, and an example of the letter that was sent out is attached as **Annex 1** of this report.
- 2.4 This letter was also sent to all those required by duty to cooperate regulations as well as diversity groups in and around the Chippenham area.

- 2.5 A Public notice was placed within the local newspaper covering the area; namely the Wiltshire Gazette and Herald. The formal notice that was used is attached as **Annex 2** of this report.
- 2.6 As stated in the letter and notice, the consultation documents were made available to view on the council's website (see Figures 2.1 and 2.2) as well as documents being made available for viewing at the council's main office hubs (Chippenham, Salisbury and Trowbridge) and at Calne, Chippenham and Corsham libraries. Respondents were able to respond to the consultation via post, email or the council's consultation portal.

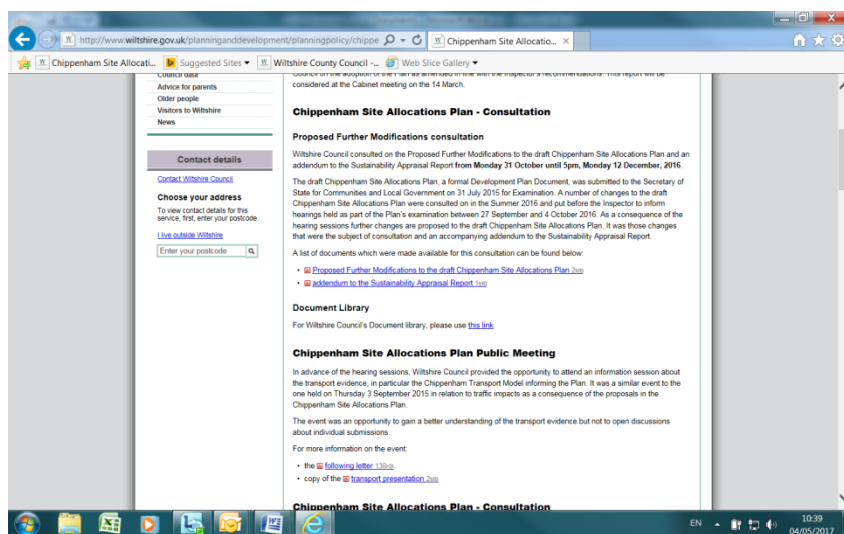


Figure 1 Print screen of the council's Chippenham Site Allocations webpage

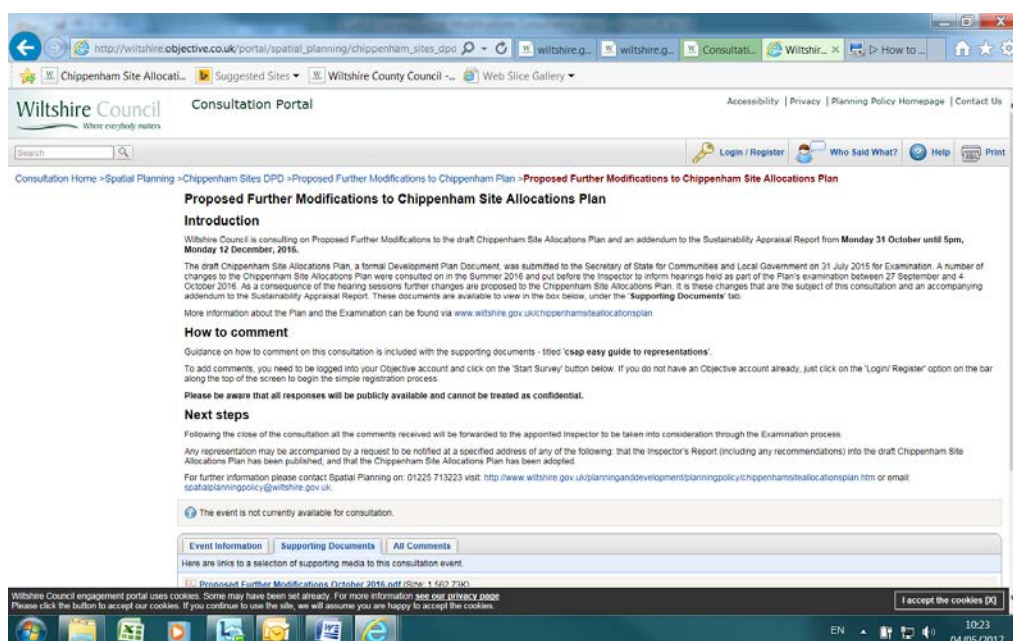


Figure 2 Print screen of the council's consultation portal page for the Proposed Further Modifications consultation

3. Overview of Consultation Responses

- 3.1 85 separate comments on the Proposed Further Modifications to the Chippenham Site Allocations Plan (CSAP) have been received from 42 contributing consultees. Of these almost a half relate to Policy CH2 (Rawlings Green) and its supporting text whilst the remainder are raising other more general comments. In relation to the predominant themes being discussed these are relating to highways, landscape, flood risk and the overall strategy of the Plan. (Some comments related to more than one theme.) Figure 1 and 2 illustrate the distribution of comments by policy and theme.

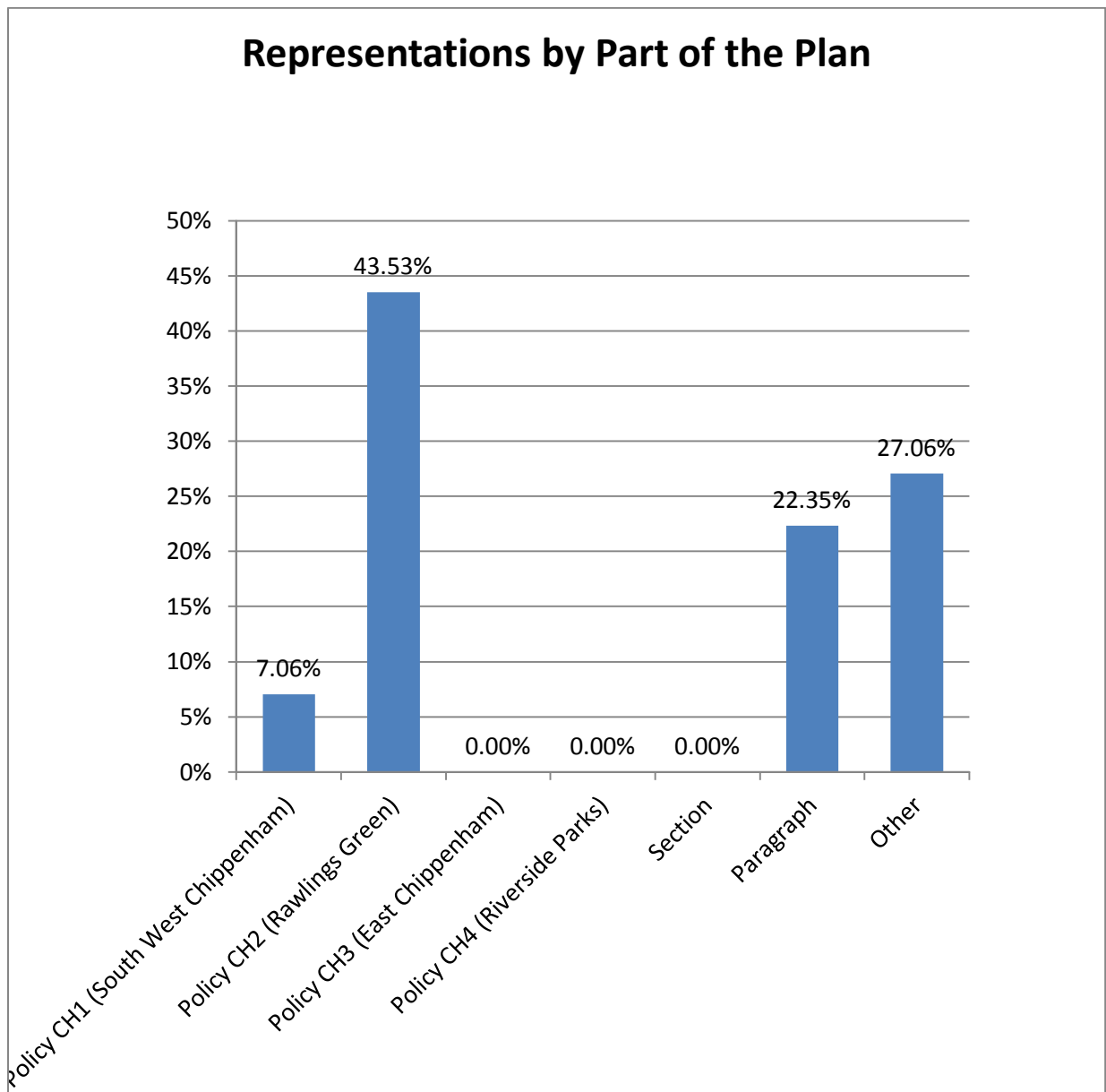


Figure 3 Representations by part of the Plan

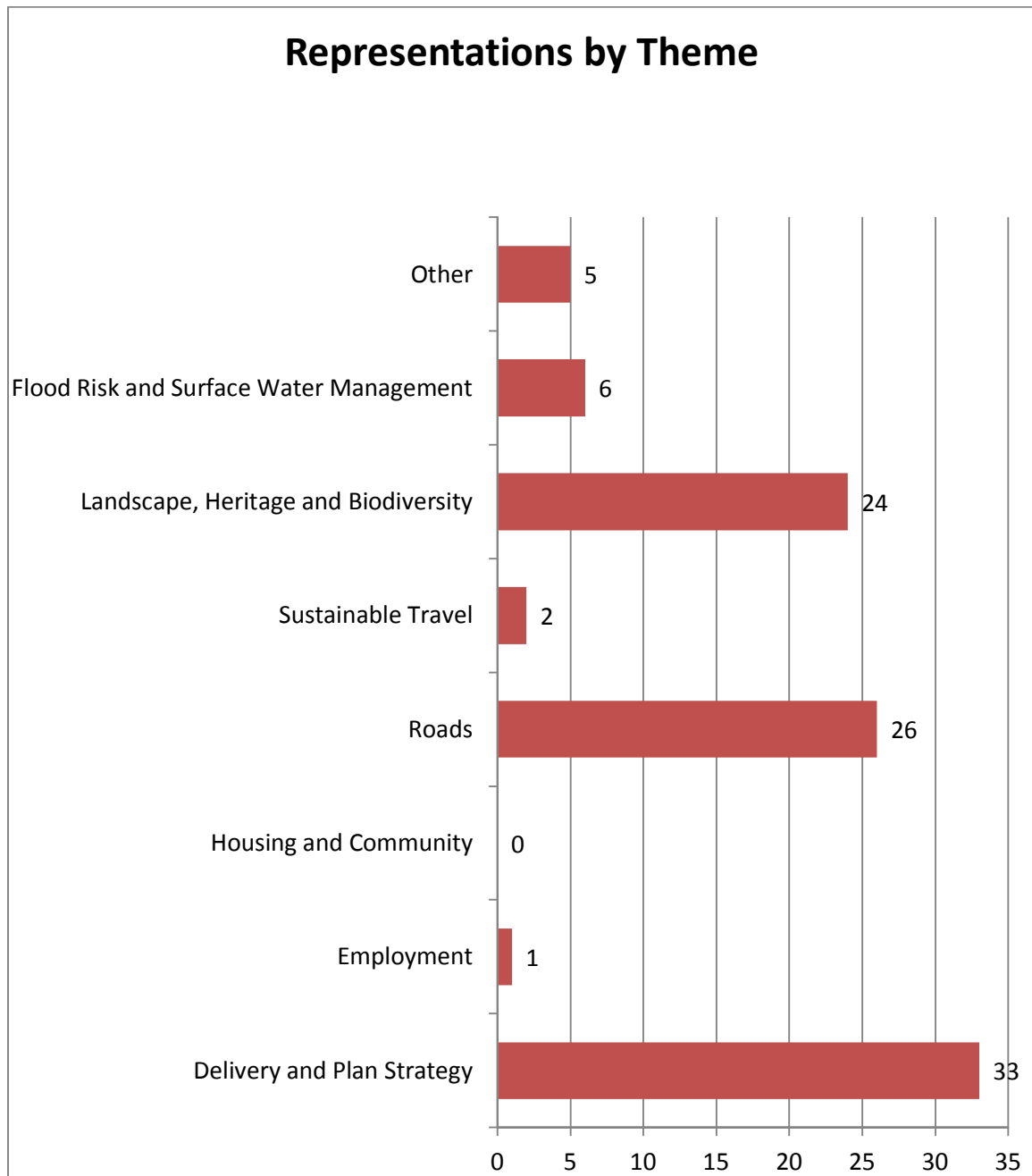


Figure 4 Representations by theme

4. Issues Raised in Consultation Responses

- 4.1 Set out below is a summary of the consultation responses to the CSAP Proposed Further Modifications consultation. The summary is provided to illustrate the distribution of comments and highlight the main issues being raised.
- 4.2 This report is organised to follow the Chapter order of the Plan. A table records the number of comments received for each individual proposed modifications to each Chapter and lists the representation reference number (The 'Comment Id'). A second table records the range of issues raised listing all the comments for

each modification accompanied by a very brief summary of the comments received.

Chapter 3: Vision and Objectives

Proposed Modifications: S98, s112, s115, s116

<i>Proposed Modification</i>	<i>Paragraph or plan reference</i>	<i>Number of representations</i>	<i>Comment Id</i>
S97	Paragraph 3.6	1	38
S112	Paragraph 2.3	3	2,29,67
S115	Paragraph 2.4	0	
S116	Footnote 31	1	70

Proposed Mod s97

Comment Id	Name	Summary of Comment
38	Mr David Mannering	Travel by cycle is important and should be considered separately from roads.

4.3 Issues raised in these representations include:

- Improve cycle route provision

Proposed Mod s112

Comment Id	Name	Summary of Comment
2	Allington Action Group	Supports the Proposed Further Modification on the grounds of improving clarity.
29	Malcolm Toogood	Supports change
67	Francis Morland	Does not agree that the A350 should be seen as a barrier to development

4.4 Issues raised in these representations include:

- Support for greater protection against development to the west of the A350
- It makes no sense at all for the Wiltshire and Swindon LEP to be directing funds to dualling the existing A350 Chippenham Bypass, supposedly to increase economic activity and development along that route, if Wiltshire Council Spatial Planning policies then preclude any development there at all on its western side.

Proposed Mod s116

Comment Id	Name	Summary of Comment
70	Francis Morland	Out of date footnote - should now be referring to 2016 HLSS

4.5 Issues raised in these representations include:

- It makes no sense at all to be including figures beyond the Plan period in Table 6.1 and simply underlines how very far policies have fallen short in delivering the required level of house building in Chippenham.

Chapter 4: Development Strategy

Proposed Modifications: s98, s117, s120

<i>Proposed Modification</i>	<i>Paragraph or plan reference</i>	<i>Number of representations</i>	<i>Comment Id</i>
S98	Paragraph 4.4	3	22,26,48
S117	Paragraph 4.21	2	33,47
S120	Figure 4.1	0	

Proposed Mod s98

Comment Id	Name	Summary of Comment
22	CAUSE 2015	Ensure provision of employment land is prioritised.
26	Terence O'Rourke	Text should be added to state that alternative sites should be permitted if delivery rates are not met.
48	David Wilson Homes	there is a need to identify additional sources of supply to contribute to developable supply, i.e. Gate farm

4.6 Issues raised in these representations include:

- Priority should be given to the early development of employment land to bring in new jobs, which will encourage new employees to find local homes enabling sustainable commuting
- The plan states that delivery should take place within the plan period to meet the requirements of Wiltshire Core Strategy, but South West Chippenham trajectory shows it will extend beyond the plan period. Alternative sites should be permitted if delivery rates are not met.
- There is a risk that the area won't deliver, or the delivery of housing will be slower than anticipated, therefore the housing requirements set out in the WCS will not be met by the Plan. There is a need to identify additional sources of supply to contribute to developable supply

Proposed Mod s117

Comment Id	Name	Summary of Comment
33	CPRE	Alternative transport provision required prior to building of new roads.
47	David Wilson Homes	Not all sites which are required for the completion of the Eastern Link Road have been safeguarded within the plan and they should be. Not providing the ELR isn't positive planning

4.7 Issues raised in these representations include:

- Modification isn't sound as it is not made clear that new road links on the periphery will not be built before effective transport alternatives to the car for accessing the town centre have been achieved. Without this prioritisation any attempt to reduce car use and its attendant problems is rendered ineffectual
- Not all sites which are required for the completion of the Eastern Link Road have been safeguarded within the plan and they should be.
- Not providing the Eastern Link Road is not positive planning as the submitted strategy has the most beneficial effects and is not being taken forward

Chapter 5: Site Allocations

Proposed Modifications: s99, s100, s101, s102, s103, s108, s109, s110, s111, s113, s118, s119

<i>Proposed Modification</i>	<i>Paragraph or plan reference</i>	<i>Number of representations</i>	<i>Comment Id</i>
S99	Paragraph 5.1b	0	
S100	Paragraph 5.18	1	49
S101	Paragraph 5.18b	3	7,19,85
S102	Paragraph 5.18b	4	20,43,73,84
S103	Paragraph 5.33	3	9,23,38
S108	Policy CH1	2	32,50
S109	Policy CH1	1	35
S110	Paragraph 5.1a	1	45
S111	Paragraph 5.10	0	
S113	Policy CH1	4	13,34,62,65
S114	Paragraph 6.14b	1	69
S117	Paragraph 4.21	2	33,47
S118	Policy CH2	27	6,8,39,1,11,14,15,16,17,24,28,31,36,37,40,41.44, 53,54, 55,56, 57,58, 59,63, 64, 71,72
S119	Figure 5.2	5	14, 18, 42, 57, 64

Proposed Mod s100

Comment Id	Name	Summary of Comment
49	David Wilson Homes	The specific areas to be safeguarded for the Eastern Link Road should be shown on a map to ensure that the most sustainable alignment is able to be provided in the future

4.8 Issues raised in these representations include:

- the specific areas to be safeguarded for the Eastern Link Road should be shown on a map to ensure that the most sustainable alignment is able to be provided in the future

Proposed Mod s101

Comment Id	Name	Summary of Comment
7	Kim Stuckey	The B4069 or Station Hill roads could be the sole access for traffic if North Chippenham link road is not completed leading to congestion
19	CAUSE 2015	Reliance/need for Northern Link Road not mentioned.
85	Mr Roger Taylor	Issue of land ownership between the railway line and Parsonage Way

4.9 Issues raised in these representations include:

- There is no criteria within Policy CH2 which requires the completion of the link road from the A350 to the B4069 before any or all of the Rawlings Green houses are built. If the railway bridge was completed, all 650 homes could be built at Rawlings Green with potentially no link road to the A350 in place at all. This would take all traffic from the development either onto the unsuitable B4069 or onto Station Hill in Chippenham.
- The land ownership between the railway line and Parsonage Way needs to be resolved.

Proposed Mod s102

Comment Id	Name	Summary of Comment
20	CAUSE 2015	Uncertainty over the delivery of the Cocklebury Link Road.
43	Hallam Land Management	Questions deliverability of the Cocklebury Link Road, proposed change makes this more uncertain
73	Cllr Chris Caswill	There is nothing in the planning application/conditions that secure funding for the railway bridge, therefore putting the delivery of CH2 at risk
84	Ms Marilyn Mackay	Figure 5.2 and Planning Application master plan do not match up Nothing in S106 agreement to confirm funding for bridge Land ownership at Parsonage way is still not resolved

4.10 Issues raised in these representations include:

- The Proposed Modification fails to provide clarity. It compounds the uncertainty that the Cocklebury Link Road is deliverable.
- The modification is not consistent with the Heads of Terms approved by the Council's Planning Committee on 14 September 2016, which contain no reference to the delivery of the bridge

Proposed Mod s103

Comment Id	Name	Summary of Comment
9	Kim Stuckey	Concerned that the master planning process will lead to a massive reduction in the area allocated as country park. Wants further reassurance within policy that there will not be an overall reduction in size of park
23	CAUSE 2015	Planning Application master plan doesn't match figure 5.2.
38	Mr David Mannering	Travel by cycle is important and should be considered separately from roads. New link roads should be built to incorporate cycle ways. Pedestrian access to key locations is a disgrace with potholes and brambles blocking the way

4.11 Issues raised in these representations include:

- Master planning may be required to define precise boundaries of County Parks, however there is no protection within paragraph 5.33 for master planning to remove great areas of park from the indicative diagram in 5.2 (revised in these modifications), with no further consultation with the public.
- Until the CH2 planning application is aligned to the modified CSAP, the CSAP must be considered ineffective and thence unsound.
- Include suggestions for cycleway and pedestrian links as a part of the sustainable transport package.

Proposed Mod s108

Comment Id	Name	Summary of Comment
32	CPRE	Revised wording needs to be accompanied by an evidenced explanation.
50	David Wilson Homes	Seeks to set out the land uses within the SW Chippenham site, rather than identifying the site boundary and allowing the master planning process to set out the layouts. This approach is different from the WCS approach and could constrain development

4.12 Issues raised in these representations include:

- Removal of "mixed use development" results in an imbalance and is contrary to the desire to see less blocks of housing, and more variable uses across parcels of land. There is no written explanation of this amendment.
- The modification is contrary to the Wiltshire Core Strategy, it is also overly prescriptive and inflexible, prejudicing the ability for more sustainable or less constrained areas to be developed for appropriate land-uses in the light of evidence developed through the master-planning process.
- There is no justification for the approach proposed by this modification.

Proposed Mod s109

Comment Id	Name	Summary of Comment
35	CPRE	More emphasis required to retain hedgerows

4.13 Issues raised in these representations include:

- Not sound as it is too simple to argue that it is appropriate to take out hedgerows in order to build much needed housing or access to housing. Revert to original wording

Proposed Mod s110

Comment Id	Name	Summary of Comment
45	David Wilson Homes	Modification should be removed as it is a duplication

4.14 Issues raised in these representations include:

- This modification is unnecessary as it duplicates the phrase in the subsequent sentence.

Proposed Mod s113

Comment Id	Name	Summary of Comment
13	CAUSE 2015	Supports provision for future Southern Link Road
34	CPRE	Brownfield development should come before greenfield development and be carried out prior to road connections being required to the east.
62	Dr Nicolas Murray	Support the need and provision for the Southern Link Road
65	Mr T Molloy	Development in the east will lead to increased traffic and congestion.

4.15 Issues raised in these representations include:

- Support the proposed modification
- The emphasis on creating outward development and connections is not balanced by reference to town centre (brownfield) development first. A proviso is needed showing that brownfield redevelopment in the centre comes before future connections to land to the east.

Proposed Mod s114

Comment Id	Name	Summary of Comment
69	Francis Morland	Housing numbers are too low to justify Chippenham as a Principle Settlement

4.16 Issues raised in these representations include:

- The targets for house building in Chippenham are so low and are being cut further. Why is Chippenham given the status of a Principal Settlement in the Wiltshire Core Strategy?

Proposed Mod s117

Comment Id	Name	Summary of Comment
33	CPRE	Alternative transport provision required prior to building of new roads.
47	David Wilson Homes	Not all sites which are required for the completion of the Eastern Link Road have been safeguarded within the plan and they should be. Not providing the ELR is not positive planning (as required by the NPPF) as the submitted strategy has the most beneficial effects and is not being taken forward

4.17 Issues raised in these representations include:

- Modification unsound as it is not made clear that new road links on the periphery will not be built before effective transport alternatives to the car for accessing the town centre have been achieved. Without this prioritisation any attempt to reduce car use and its attendant problems is rendered ineffectual.
- Modification identifies that the 2 strategic allocations "safeguard the potential for future road alignments to the east and south of the town". However, this is not entirely true and would benefit from clarification.

Proposed Mod s118

Comment Id	Name	Summary of Comment
1	Kim Stuckey	How will the country park be funded? - What form will the country park take? - How will the riverside park protect and enhance landscape & biodiversity? - There is no evidence of the Inspectors suggestion (letter dated 12 October 2016) being incorporated into the plan, that prior to the occupation of the 201st dwelling, a 25m wide tree belt will be present.
6	Kim Stuckey	CH2 causes significant harm to landscape and character of villages
8	Kim Stuckey	The B4069 or Station Hill could be the sole access for traffic if North Chippenham link road is not completed leading to congestion
11	Tytherton Lucas Residents Association	CH2 no longer required due to housing numbers coming forward. Infrastructure costs too high. Who will fund the bridge? Land for bridge still not certain, NLR delay until 450 homes. CH2 Delivery uncertainty. Landscape effects cannot be mitigated.
14	CAUSE 2015	Scale of Development is not needed at CH2 Major adverse landscape impact which can't be mitigated Infrastructure costs will be too great and impact deliverability Access via Parsonage Way and the prior completion of the Northern Link Road is critical The need for a Cocklebury Link Road is not proven
15	CAUSE 2015	CH2 does not match planning application map - development in country park

		CH2 should contain less than 700 homes.
16	CAUSE 2015	Railway bridge delivery and funding uncertainty. Uncertainty over delivery of CLR/timing of delivery and whether the NLR will be delivered in time for when the CLR is completed.
17	CAUSE 2015	Noise and light pollution the CLR is not clearly mitigated against.
24	CAUSE 2015	Loss of Landscape is not being mitigated within CH2.
28	Kim Stuckey	Suggests completing the CLR before employment land is developed to help traffic congestion. Concerns about air quality assessment in SEA
31	Graham Young	Development worsens congestion. Building adjacent to floodplain contrary to NPPF. Irreversible losses to landscape (hedgerows)
36	Nick Leatherhead	Development at CH2 not required with other brownfield sites available. Loss of landscape unnecessary with other options available.
37	Helen Minto	Scale of development at Rawlings Green not required due to brownfield provision. Development at Rawlings Green will affect the wildlife diversity present on site. Effect Tytherton Lucas conservation village.
39	Mr David Mannering	Support changes. Concern that master plan of application does not meet CSAP requirements and developers should be told it needs to be brought into line
40	Marilyn Adcock	Brownfield provision not fully explored. Restrict development at Rawlings Green to that suggested in Inspectors letter of 12/10/16 Must maintain quality of County Wildlife site
41	Environment Agency	No buildings in any FZ2/3 part of the site unless the Sequential Test, and if appropriate the Exception Test, is passed.
44	Bremhill Parish Council	Housing numbers indicate the size of Rawlings Green no longer required. Viability is questionable. Question remains over land ownership issue. Delays to NLR could cause a large increase in traffic congestion. Rawlings Green is elevated in the countryside, 3 storey dwellings will be very visible and cause harm to the environment. Flooding is already an issue, and this development will only make things worse.
53	Mr Edwin Helps	Supports that development should be limited until a road linking the B4069 and Cocklebury Road has been constructed, seeking to secure this through planning permission. Hope the country park is enforced with the same weight
54	Mr A Birch	Questions deliverability of the CLR, proposed change makes this more uncertain
55	Ian Humphrey	Funding for railway bridge is in doubt. Wiltshire College campus housing will mean that the road will become even more congested before any accesses are built. No evidence of recent air quality monitoring, which will now get worse with additional traffic.
56	Susan Harnell	No longer need a 650 home development at Rawlings Green. Rawlings Green is unviable due to the construction costs associated with the railway bridge and burying pylons Rawlings Green is set in the Avon Valley and is highly

		visible. Abundant wildlife threatened by development Flooding has become worse in recent years and this loss of greenfield land will make it worse.
57	Dr Nicholas Murry	Development no longer required. Rawlings Green is not viable due to cost of bridge, country park etc. Is not deliverable due to Parsonage Way land dispute. NLR not being delivered until 450 homes are built could lead to large increases in congestion. 200 house trigger for CLR is unsuitable due to out of date traffic modelling.
58	Dr Nicholas Murry	Road will be in too close proximity to Tytherton Lucas and will cause noise and light pollution. Future link road would be highly visible on outward facing slopes, screens and filters would not be capable of avoiding or adequately mitigating these impacts.
59	Dr Nicholas Murry	Development of the land at Rawlings Farm would have major significant permanent adverse impacts on the character and visual qualities of the area
63	Mr N Hartnell	CH2 area floods and building on this site will increase flood risk
64	Rosalind Robinson	The residual requirement could be found from brownfield development so there is no need to develop Rawlings Green - if development does occur it should be no more than 650 houses and Figure 5.2 should be followed for site layout. Development at Rawlings Green will be highly visible from Tytherton Lucas and will significantly affect the surrounding landscape which is a haven for wildlife and is designated a County Wildlife Site.
71	Cllr Chris Caswill	The scale of development is not needed at Rawlings Green Infrastructure costs put deliverability at risk Access via Parsonage Way and the prior completion of the Northern Link Road is at significant risk The need for a Cocklebury Link Road is not proven - could increase traffic at Station Hill The effectiveness of and impact of the Cocklebury Link Road have not been properly assessed
72	Cllr Chris Caswill	Supports the 650 homes limit, as it would allow some improved landscaping and the proper location of a country park

4.18 Issues raised in these representations include:

- What is the form of the Country Park?
- There appears to be no common ground on funding the country park going forward.
- It appears something over £50-60K a year is required for the country park, which probably would need £2.5m to be commuted to provide the endowment. Is this committed by the developer as part of Policy CH4 or in the Statement of Common Ground? What happens if this is not provided?
- The Inspector made a recommendation in his letter of 12th October 2016 to the Council (bullet point 3) stating *“prior to the occupation of the 201st dwelling a tree belt at least 25m wide shall be established along the west bank of the River Avon”*. There is no modification to Policy CH2 or CH4 to bring this recommendation into effect.

- Development of the Rawlings Green site causes significant harm to the character and visual qualities of the area, and conflicts with Wiltshire Core Strategy Core Policy 51.
- The S106 agreement for the development at North Chippenham (Birds Marsh) allows for 450 houses to be built, or four years after first occupation, before any road from the Malmesbury Road A350 roundabout to Maud Heaths Causeway B4069 is complete. There is no requirement within Policy CH2 for the completion of this link road from the A350 to the B4069 before any or all of the Rawlings Green houses are built.
- If the railway bridge was completed, all 650 homes could be built at Rawlings Green with potentially no link road to the A350 in place at all. This would take all traffic from the development either onto the unsuitable B4069 or onto Station Hill in Chippenham.
- **The scale of homes is not needed.** With 1400 homes proposed in CH1 and 150 homes which were approved at Langley Park there is a requirement of only 230 homes. These can be delivered by windfall brownfield sites as well as other non-strategic sites. An additional 650 homes at Rawlings Green is not required and the overprovision of development is not sustainable.
- **The infrastructure costs are too high which will affect deliverability and viability.**
- **Who will pay for the bridge?**
- **Access to the bridge** - there is still a dispute as to who owns the land. It is open to the council to compulsory purchase the land however this will be extremely expensive and again underlines the problems relating to viability and deliverability of the site.
- Wavin is proposing that the link from the B4069 will be via a new road rather than Parsonage way. This needs to be clarified.
- **CH2 is very vague on deliverability.** It should be made crystal clear that the developer will provide a bank guarantee or suitable bond covering infrastructure including the railway bridge, purchase of any land to access the bridge and building the road. Without this there is no guarantee that the developer will be able to complete the development. A partially built development would be the worst of all worlds in that traffic would be far worse yet the number of homes would not have met the number of homes listed in the consent.
- **It is critical that** the number of houses is reduced from 700 to 650 as suggested by the inspector and that the size and location of the country Park follow the inspector's recommendation. CH2 should make both of these clear.

Proposed Mod s119

Comment Id	Name	Summary of Comment
14	CAUSE 2015	Scale of Development is not needed at CH2 Major adverse landscape impact which can't be mitigated Infrastructure costs will be too great and impact deliverability Access via Parsonage Way and the prior completion of the Northern Link Road is critical The need for a Cocklebury Link Road is not proven
18	CAUSE 2015	Figure 5.2 does not match master plan. Re-run viability assessment. Burying of electricity pylons is not included in current viability assessment, cost of managing country parks is not currently included in viability assessment.

42	Environment Agency	Development master plans must respect floodplain associated with "ordinary" watercourse not shown on a map.
57	Dr Nicholas Murry	Development no longer required at Rawlings Green. Rawlings Green is not viable due to cost of bridge, country park etc. Rawlings Green is not deliverable due to Parsonage Way land dispute. NLR not being delivered until 450 homes are built could lead to large increases in congestion. 200 house trigger for CLR is unsuitable due to out of date traffic modelling.
64	Rosalind Robinson	The residual requirement could be found from brownfield development so there is no need to develop Rawlings Green - if development does occur it should be no more than 650 houses and Figure 5.2 should be followed for site layout. Development at Rawlings Green will be highly visible from Tytherton Lucas and will significantly affect the surrounding landscape which is a haven for wildlife and is designated a County Wildlife Site.

4.19 Issues raised in these representations include:

- **Scale of development is not needed**
- If it is to be included then we agree with the proposed modification to Figure 5.2 to **"include land in the Country Park area up to the 50m contour"**, because this now excludes all land liable to flooding and enhances the potential for protection of biodiversity alongside the River Avon County Wildlife Site (CWS) in line with the Sustainability Appraisal objective 1.
- The viability assessment needs to be revisited and is likely to show that the CH2 site is not viable. Since the Council only needs to find an additional 230 homes by 2026 and not the 650 included in CH2, we would suggest that this could more easily be achieved by making use of windfall brown field sites and non-strategic infill sites.
- This proposed modification appears to be bringing the proposed development area further away from the eastern watercourse and potentially closer to the ordinary watercourse to the north of the site. It is good that the intention is to propose a larger area for the Country Park, which will result in setting development well back from the main river floodplain (FZ3/2), however it is important to be mindful that the proposed development area respect the floodplain [if any] associated with the 'ordinary' watercourse.

Chapter 6: Monitoring and Implementation

Proposed Modifications: s107, s114

<i>Proposed Modification</i>	<i>Paragraph or plan reference</i>	<i>Number of representations</i>	<i>Comment Id</i>
S107	Table 6.1	4	21,27,51,68
S114	Paragraph 6.14b	3	46,52,69

Proposed Mod s107

Comment Id	Name	Summary of Comment
21	CAUSE 2015	CLR & NLR should be built prior to the construction of the 200th dwelling at Rawlings Green.
27	Terence O'Rourke	table 6.1 should include the delivery trajectories for hunters moon and north Chippenham
51	David Wilson Homes	CH1 will not deliver by April 2017 - delaying housing trajectory/causing a lack of 5 year housing land supply. Other sites may also not deliver - leading to fragile 5 year housing land supply. Include other sites - Gate Farm.
68	Francis Morland	Table 6.1 should not extend beyond plan period.

4.20 Issues raised in these representations include:

- No more than 200 homes should be built at Rawlings Green before the completion of both the Cocklebury Link Road and the Northern Link Road through to the A350. Add a note to Table 6.1.
- It is not clear why Table 6.1 includes housing trajectory information for Rawlings Green and South West Chippenham, but does not include similar information for Hunter's Moon or North Chippenham, especially given that previous versions of the plan included a Table 6.2 which did include such information. Amend the Plan.
- The Council's 2016 Housing Land Supply Statement identifies a 4.88 year land supply across the HMA once a 5% buffer is included (and using the Liverpool approach). With the correct NPPG compliant Sedgefield approach the Council's figures would indicate that there is a 4.65 year land supply. Once the Chippenham allocations are added to the deliverable supply and assuming the delivery trajectories identified in modification S107, the land supply position increases to 5.42 years using the Liverpool approach or 5.16 years using the correct Sedgefield approach. Therefore, even on the Council's figures there is a need for additional allocations at Chippenham in order to restore a five year land supply across the HMA.
- The Wiltshire Core Strategy only covers the period to 2026; it makes no sense at all to be including figures beyond the Plan period in Table 6.1 as proposed in Appendix 1 and simply underlines how very far Wiltshire Council's Spatial Planning policies have fallen short in delivering the required level of house building in Chippenham.

Proposed Mod s114

Comment Id	Name	Summary of Comment
46	David Wilson Homes	Modification will stall review of plan, which may be necessary prior to 2020 as South West Chippenham will not deliver to the projected housing trajectory.
52	Hallam Land Management	Uncertainty of delivery - reserve sites should be triggered if targets not met.
69	Francis Morland	Housing numbers are too low to justify Chippenham as a Principle Settlement

4.21 Issues raised in these representations include:

- Modification S114 sets a series of triggers for a plan review. The second part of modification S114 will actively prevent an early review, as even when the Council identify delays to the strategic allocations in advance of 2020, the modification will not require any review to be commenced until 2020 at the earliest. This would simply stall much needed housing delivery, by failing to recognise and react to delays in a timely fashion. Reword modification.
- The proposed revisions to the triggers for review of the Plan compound the concerns regarding deliverability given that half of the plan period has already elapsed. Given that the adoption date of the Plan has extended outwards from that originally anticipated, the triggers for review based on delivery rates should be commensurately shorter and relate to higher dwelling quanta. If the Inspector accepts that the inclusion of reserve sites is an appropriate expedient to mitigate the delivery uncertainties, then triggers need to be included relating to the release of the reserve sites. The trigger points must give sufficient time for the reserve site(s) to be progressed through the development management process and preliminary works to be undertaken to enable delivery of dwellings as soon as possible after 2020. This will require a commitment to their release no later than 2020.
- The targets for house building in Chippenham are so low and are being cut further. With these figures, why is Chippenham given the status of a Principal Settlement in the Wiltshire Core Strategy?

Other Comments

<i>Proposed Modification</i>	<i>Paragraph or plan reference</i>	<i>Number of representations</i>	<i>Comment Id</i>
	Other	15	3, 4, 5, 10, 66, 74, 75, 76, 77, 78, 79, 80, 81,82,83,

Comment Id	Name	Summary of Comment
3	Bath & North East Somerset Council	No Comments
4	Southern Water	No Comments
5	CLH Pipeline Systems Ltd	CLH Pipeline may be affected by development.
10	Natural England	No comments
66	Highways Agency	Highways England's position on the CSAP remains unchanged
74	Fionn Pilbrow	Fully support the representation made by CAUSE.
75	Mrs Saritha Pilbrow	Fully support the representation made by CAUSE.
76	Mrs Patricia Wilkinson	Fully support the representation made by CAUSE.
77	Mrs Pauline Hillier	Fully support the representation made by CAUSE.
78	Mrs Ruth Baldwin	Fully support the representation made by CAUSE.
79	Mr Peter	Fully support the representation made by CAUSE.

	Baldwin	
80	Mr Mark Baldwin	Fully support the representation made by CAUSE.
81	Mr David Baldwin	Fully support the representation made by CAUSE.
82	Mr Peter Burgess	Fully support the representation made by CAUSE.
83	Mrs Nichola Johnson	Fully support the representation made by CAUSE.

4.22 Issues raised in these representations include:

- CLH Pipeline may be affected by development
- Support for representations submitted by CAUSE 2015

Sustainability Appraisal

<i>Proposed Modification</i>	<i>Paragraph or plan reference</i>	<i>Number of representations</i>	<i>Comment Id</i>
Other	Sustainability Appraisal	5	12,25,30,60,61

Comment Id	Name	Summary of Comment
12	Mr Kim Stuckey	Questions how CH2 country park can have a positive impact to biodiversity when the rest of the land is to developed and questions landscape assessment/impacts.
25	CAUSE 2015	Unclear how the creation of 650 homes and office space can improve biodiversity according to the SA, can the council provide evidence. Hard to understand how landscape can be positively rated in the SA when the site will destroy a sloping greenfield riverside environment.
30	Mr Malcolm Toogood	There is not sufficient air quality monitoring points in Chippenham (especially when compared to Salisbury). There is little evidence which can be used to judge the effects of development, meaning that developers can lie.
60	Dr Nicolas Murry	SA doesn't acknowledge any medium or long term impacts of development.
61	Dr Nicholas Murry	SA doesn't acknowledge any negative impacts to the landscape, incorrectly suggesting that the country park will mitigate all negative effects.

4.23 Issues raised in these representations include:

- *SA Objective 1* - What have been the biodiversity impacts on other green field sites, when one fifth of the land is reserved for recreational use and four fifths of the land are developed? Surely the impacts cannot be strongly positive as the Council has asserted here? Amend the SA assessment to be "Short term: --- , Medium Term: -- Long term: --/+ "

- SA Objective 7 - It is impossible to understand how the assessment of impacts can be +/- for the short term to becoming ++/- for the medium to long term. Amend the SA assessment to be “Short term: --- , Medium Term: -- Long term: --/+”
- There are references throughout this document to air quality. Apart from one specific confined location at the Bridge Centre, Wiltshire Council has insufficient evidence of current air quality in the vast majority of Chippenham.

Annex 1: General Email informing of Chippenham consultation



Spatial Planning
Economic Development and Planning
Wiltshire Council
County Hall
Bythesea Road
Trowbridge
Wiltshire
BA14 8JN
spatialplanningpolicy@wiltshire.gov.uk

30 October 2016

Our reference: CSAP161030

Dear Sir / Madam

Chippenham Site Allocations Plan – Consultation

Wiltshire Council is consulting on Proposed Further Modifications to the draft Chippenham Site Allocations Plan and an addendum to the Sustainability Appraisal Report **from Monday 31 October until 5pm, Monday 12 December, 2016.**

The draft Chippenham Site Allocations Plan, a formal Development Plan Document, was submitted to the Secretary of State for Communities and Local Government on 31 July 2015 for Examination. A number of changes to the draft Chippenham Site Allocations Plan were consulted on in the Summer 2016 and put before the Inspector to inform hearings held as part of the Plan's examination between 27 September and 4 October 2016. As a consequence of the hearing sessions further changes are proposed to the draft Chippenham Site Allocations Plan. It is these changes that are the subject of this consultation along with an accompanying addendum to the Sustainability Appraisal Report.

How to view the consultation documents

The consultation documents can be viewed:

- online at www.wiltshire.gov.uk/chippenhamsiteallocationsplan
- in local libraries at Chippenham, Corsham and Calne during normal opening hours; and
- at the council's main office hubs at Monkton Park (Chippenham), Bourne Hill (Salisbury) and County Hall (Trowbridge) during normal opening hours.

How to comment on the Proposed Further Modifications to the Plan

A representation form and accompanying guidance note have been prepared to assist you in responding to the consultation.

We welcome your comments in writing by 5pm on 12 December 2016 via the following means:

Telephone: 0300 456 0100 • Textphone: 01225 712500 • Web: www.wiltshire.gov.uk

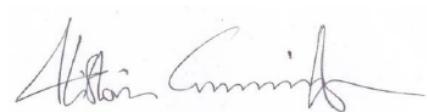
- online via the council's consultation portal: <http://consult.wiltshire.gov.uk/portal>
(You are encouraged to respond in this way if you can, to assist the council in managing the representations received)
- by email using the representation form available at www.wiltshire.gov.uk/chippenhamsiteallocationsplan and returned to spatialplanningpolicy@wiltshire.gov.uk; or
- by post in writing to: Spatial Planning, Economic Development and Planning, Wiltshire Council, County Hall, Bythesea Road, Trowbridge, Wiltshire, BA14 8JN.

Following the close of the consultation all the comments received will be forwarded to the appointed Inspector to be taken into consideration in the production of his report following the Examination of the draft Chippenham Site Allocations Plan.

Any representation may be accompanied by a request to be notified at a specified address (email preferable) of any of the following: that the Inspector's Report (including any recommendations) into the draft Chippenham Site Allocations Plan has been published; and that the Chippenham Site Allocations Plan has been adopted.

For further information please contact Spatial Planning on 01225 713223 or email spatialplanningpolicy@wiltshire.gov.uk.

Yours faithfully



Alistair Cunningham

Associate Director
Economic Development and Planning
Wiltshire Council

Annex 2: Public notice placed in the local newspaper

The following notice was placed in the local newspaper:

- Gazette & Herald

**Wiltshire Council Local Development Framework
Planning and Compulsory Purchase Act 2004 (as amended)
The Town and Country Planning (Local Planning) (England)
Regulations 2012 and
The Environmental Assessment of Plans and Programmes Regulations 2004
Consultation on Proposed Further Modifications to the draft
Chippenham Site Allocations Plan**

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Availability of Documents

The consultation documents can be viewed at: www.wiltshire.gov.uk/chippenhamsiteallocationsplan and at the following locations during normal opening hours: the council's main offices at Monkton Park (Chippenham), Bourne Hill (Salisbury) and County Hall (Trowbridge); and in local libraries at Chippenham, Corsham and Calne.

How to submit comments

We welcome your comments in writing by 5pm on 12 December 2016 via the following means:

- online via the council's consultation portal: <http://consult.wiltshire.gov.uk/portal>
- by email using the form available at: www.wiltshire.gov.uk/chippenhamsiteallocationsplan and returned to spatialplanningpolicy@wiltshire.gov.uk; or
- by post in writing to: Spatial Planning, Economic Development and Planning, Wiltshire

Council, County Hall, Bythesea Road, Trowbridge, Wiltshire, BA14 8JN.

Next steps

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Any representation may be accompanied by a request to be notified at a specified address of any of the following: that the Inspector's Report (including any recommendations) into the draft Chippenham Site Allocations Plan has been published; and that the Chippenham Site Allocations Plan has been adopted.

**Report of Proposed Further
Modifications Consultation October –
December 2016**

May 2017

This document was published by the Spatial Planning team, Economic Development and Planning, Wiltshire Council.

For further information please visit the following website:

[www.wiltshire.gov.uk/planninganddevelopment/planningpolicy/
chippenhamsiteallocationsplan.htm](http://www.wiltshire.gov.uk/planninganddevelopment/planningpolicy/chippenhamsiteallocationsplan.htm)