



Wiltshire Council **LOCAL PLAN** Looking to the future

Formulating Alternative Development Strategies (ADSs) Wiltshire Council
Chippenham Housing Market Area



Wiltshire Local Plan Review

Formulating Alternative Development Strategies - Chippenham Housing Market Area

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Purpose

The purpose of this paper is to formulate alternative development strategies that will then each be tested to develop a preferred spatial strategy.

Introduction

1. The Local Plan Review is re-assessing the current spatial strategy for Wiltshire. A spatial strategy distributes the scale of growth for each part of the County. It is expressed in numbers of additional homes and land for employment development over the plan period 2016-2036. The public will be consulted on an emerging strategy that will result from an assessment of different alternatives. This paper formulates these alternatives.
2. A Local Housing Need Assessment has identified four housing market areas (HMAs) in Wiltshire and forecast a scale of need for each¹. Meeting the forecast need of each HMA helps to ensure needs are met where they arise. The subject of this paper is how scales of growth are distributed within each.
3. This paper sets out the conclusions of various assessments to identify reasonable alternative development strategies in the Chippenham Housing Market Area. They can then be tested through Sustainability Appraisal from which a preferred development strategy can emerge.
4. The aim is not to identify all conceivable alternative development strategies. This would be impractical. The aim instead is to have a set that contains sufficiently different alternatives that represent sensible choices, capable of being tested.

¹ Swindon and Wiltshire Local Housing Needs Assessments 2018-19, ORS, (April 2019)

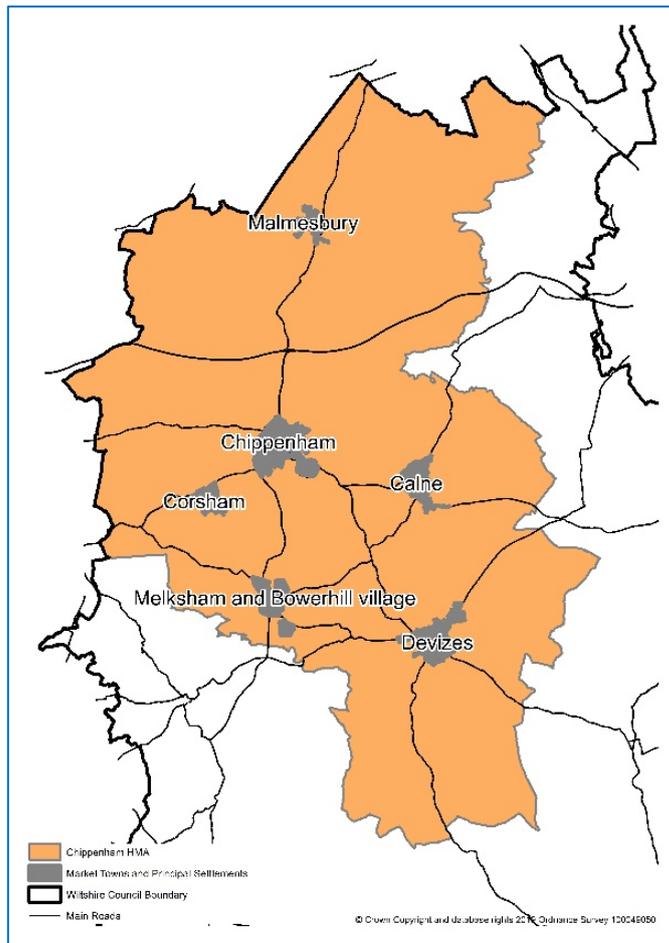


Figure 1 Chippenham Housing Market Area

5. The process is carried out through comparison with rolling forward the current spatial strategy (as set out in the Wiltshire Core Strategy). Rolling forward the current strategy uses the forecast scales of need and applies it to a distribution that has already been found sound.
6. Assessments examine where there may need to be changes by a set of comparisons. They examine:
 - The risks of unacceptable environmental impacts;
 - Comparisons with social and economic factors (such as employment projections); and
 - Deliverability
7. The results of public consultation also help to highlight where alternatives may need to be considered, in terms of new issues and opportunities. Possible alternatives are also influenced by the capacity of the infrastructure necessary to support new development.
8. Assessment is divided into two parts:
 - By place; and
 - By potential scales of growth.

Rolling forward the current strategy

What scales of growth would there be continuing the current strategy?

9. Each part of the Housing Market Area (HMA) accommodates the equivalent share of housing and employment needs as the current Wiltshire Core Strategy.
10. A local housing need assessment for Wiltshire is based upon a standard national method². The standard method identifies a minimum number of homes that addresses projected household growth. Local housing need assessment suggests a higher figure than the minimum taking account of long-term migration trends, the balance of workers to jobs, amongst other aspects³. The higher figure (45,630 homes) is used to develop alternatives. It recognises this additional assessment and the benefit of having some contingency as a part of housing delivery.
11. Overall, the evidence suggests a need to plan for 43% more homes in the Chippenham HMA over the plan period compared to 2006-2026, as shown in Table 1 below. Rolling forward this increase in the same distribution as the current strategy suggests the following housing requirements to meet the needs of the HMA:

Settlement/Area	Wiltshire Core Strategy 2006-2026	Rolling Forward the Current Strategy
	2006-2026	2016-2036
Calne	1440	2050
Chippenham	4510	6440
Corsham	1220	1740
Devizes	2010	2870
Malmesbury	885	1260
Melksham	2240	3200
Rest of HMA	1990	2840
	14295	20400

Table 1 Housing Requirements - Rolling forward the current strategy for 2016 - 2036

12. The basis for the total amount of employment land needed over the period 2016-2036 has been established in the Swindon and Wiltshire Functional Economic Area Assessment (FEMA) 2016⁴

² The Government has consulted on wider reforms to the planning system, including the standard method for assessing housing numbers in strategic plans in 'Changes to the current planning system - Consultation on changes to planning policy and regulations', MHCLG, (Aug 2020). See also 'Swindon and Wiltshire Strategic Housing Market Assessment', ORS, (Nov 2017) and 'Swindon and Wiltshire Local Housing Needs Assessments 2018-19', ORS, (April 2019)

³ Swindon and Wiltshire Local Housing Needs Assessments 2018-19, ORS, (April 2019), figure 15

⁴ Swindon and Wiltshire Functional Economic Market Area Assessment Associates (2016)

(supplemented by the 2018 Wiltshire Employment Land Review (ELR)⁵. The employment land requirement total has been distributed according to the equivalent share of employment under the current strategy for the period 2016-36.

13. There would be an 8% reduction in the amount of employment land planned for in the next 20 years in this HMA (except Malmesbury), compared to 2011-26. The distribution to settlements and the rural area would be as follows:

Principal Settlement/Market Town	Wiltshire Core Strategy requirement 2011-26	Rolling forward for 2016-36
	Ha	Ha
Calne	6	5.5
Chippenham	28	25.7
Corsham	6	5.5
Devizes	9.9	5.5
Malmesbury	5	7.2
Melksham	6	7.2
Rest of HMA	1.6	2.9
TOTAL	62.5	61.4

Table 2 Employment Requirements - Rolling forward the current strategy for 2016 - 2036

⁵ Wiltshire Employment Land Review, Final Report, Hardisty Jones Associates (April 2018)

Context

14. Choices over what alternatives may be suitable cannot be made without considering the context in which they are being formulated. It is important to take account of the current circumstance, especially where it has changed significantly since the current strategy was adopted. There may be shifts in the local economy to which a planning framework will need to adjust, for example where there are growth or regeneration strategies in place⁶.
15. At a more practical level, the scope for alternatives must take account of commitments to development that are already in place and which would not be realistic or sensible to reverse. A proportion of the land that would be required for development has already been completed or committed (e.g. granted planning consent or has been allocated). These commitments help to define the scope for alternatives. The scale of commitments in each part of the HMA is as follows⁷:

Principal Settlements and Market Towns	Dwellings built, with planning permission or allocated, April 2018
Calne	1190
Chippenham	4610
Corsham	475
Devizes	845
Malmesbury	545
Melksham	1350
Rest of the HMA	1370
TOTAL	10390

Table 3 Current housing commitments

16. Around half the scale of local housing need is already committed. However, what is in the pipeline is not evenly distributed around the HMA.

The Chippenham and Wiltshire Housing Site Allocations Plans

17. The Chippenham Site Allocations Plan was adopted in 2017 and the scale of development estimated at each is included in the commitments above.

⁶ Paragraph: 010 Reference ID:, 2a-010-20190220Planning Practice Guidance, MHCLG (July 2019)

⁷ The baseline for data in this paper is 2018. Further work will be based on following years, but differences will not affect the high-level consideration and conclusions of this paper. Totals include sites proposed in the draft Housing Site Allocations Plan including proposed modifications which, at the time of writing, had yet to complete examination.

18. A Housing Site Allocations Plan was adopted in February 2020 that includes a number of sites for housing development at other towns and villages in the HMA. The Plan's contribution to housing supply is estimated in the commitments above⁸ from a draft stage of preparation.

Deliverability

19. The assessment of housing needs for the period 2016-2036 is much higher than current strategic requirements 2006-2026. Planning policy guidance suggests that in these circumstances it might be appropriate to apply a cap⁹. A cap is applied to help ensure that the figure is as deliverable as possible. The scale of housing need for the Chippenham HMA is equivalent to many district and other unitary authorities to which the standard method would limit the minimum number generated to an increase of 40% above current strategic requirements.¹⁰
20. Applying a similar cap to the Chippenham HMA would result in a housing need assessment of around 400 dwellings less. When developing an appropriate strategy and deciding on a strategic housing requirement, it may be necessary later to also consider how housing needs can be met and whether they are deliverable.
21. At this stage, however, it is appropriate to formulate and then test alternatives that accommodate the full scale of assessed housing need.

Wiltshire Employment Land Review

22. An Employment Land Review (ELR) for Wiltshire, dated April 2018, sets out an assessment of the future demand for Business Use Class employment land in Wiltshire, a review of the supply of sites, and assesses the fit between the two. The ELR builds on the Functional Economic Market Area (FEMA) Assessment 2016. It also provides an indicative distribution of growth within each FEMA based on alternative scenarios. The ELR then makes recommendations on practical and policy interventions needed to ensure that there is a sufficient supply of sites in Wiltshire over the period to 2036.
23. The ELR data informed the baseline analysis and strategy development in this document and the FEMA data therein has been used to derive HMA based employment data.

Green belt

24. Green belt covers a western section of the HMA (see Figure 2). Great importance attaches to green belt with the aim of preventing urban sprawl by keeping land permanently open. The outer boundary affects the future growth of some settlements in the HMA.
25. Green belt designation severely constrains development at Box. The boundary abuts the settlements of Colerne and Rudloe and affects scope for their expansion.
26. The National Planning Policy Framework states that:

⁸ The submitted draft Wiltshire Housing Site Allocations Plan included housing sites in the f the Chippenham HMA, one of which is proposed to be removed.

⁹ Paragraph: 007 Reference ID:, 2a-007-20190220 Planning Practice Guidance, MHCLG, (July 2019)

¹⁰ See Housing Need Consultation Tables, MHCLG, (Sept 2017), Bath and North East Somerset Council 626 dwellings per annum, Cotswold District Council 421 dwellings per annum, compared to Chippenham HMA 1,039 dwellings per annum

“Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans. Strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period.”¹¹”

27. Box, Colerne and Rudloe have together accommodated less than a hundred additional homes over a decade¹². This is below the scale of development that might be expected at other settlements of similar sizes. This situation might be likely to continue.
28. The scale of housing need suggests they could also be expected to accommodate a greater scale of development. However, it is not considered that pressures at settlements justify an exceptional circumstance that green belt boundaries should be altered. This might, however, suggest a result, if not accommodated, of pressures to release land that would be greater at other settlements.
29. Green belt covers land south of Colerne and west of Rudloe leaving opportunities for land release, if necessary, in other directions. Later stages of plan preparation could consider whether a green belt boundary should be established around the built up area of Box to allow a more flexible approach to redevelopment within its urban area - similar to villages around Bradford-on-Avon .

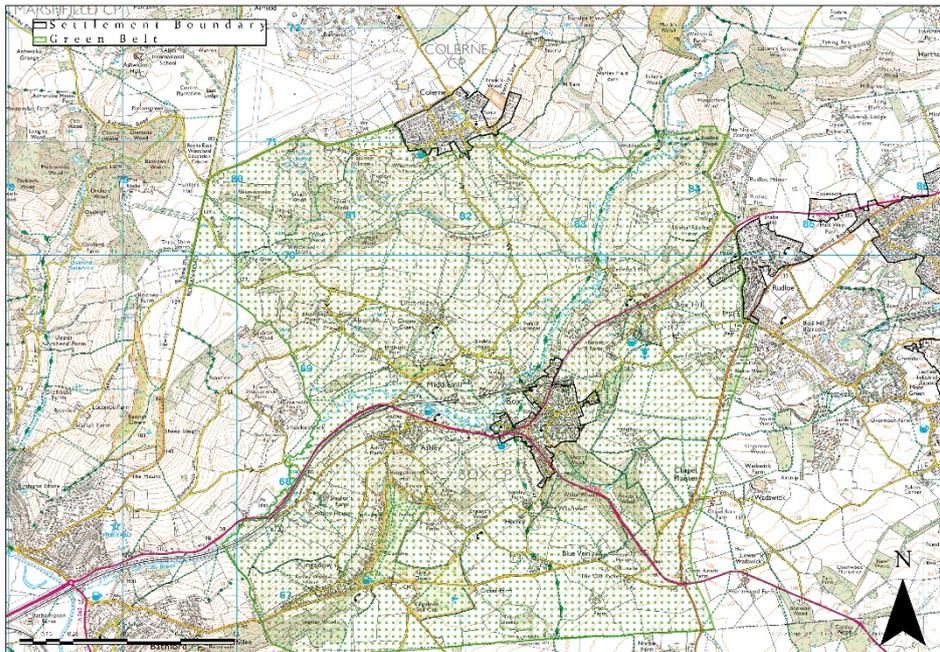


Figure 2 Green Belt boundary

Assumptions

30. At face value, assessments of need suggest a strategy that would result in planning for more homes but less employment development. The Wiltshire Core Strategy (WCS) strategy,

¹¹ Paragraph 136, NPPF, MHCLG (Feb 2019)

¹² Box 65 dwellings, Colerne 19 dwellings and Rudloe 5 dwellings over the period 2006-2016

however, deliberately allocated a large amount of land for employment land more than assessed need. It allows business greater choice and flexibility and provides much greater encouragement to local economic growth.

31. There are several assumptions at this stage.

Assumptions

Alternative development strategies should accommodate the scale of housing and employment needs identified

It is not proposed to review current plan allocations. In general, these are necessary to support a developable supply of land for housing development.

It is assumed there that there is no strategic need for a review of green belt designation boundaries.

Table 4 Assumptions

Place based assessment

Environmental Impacts

32. This element of assessment asks the question: would the continuation of the existing strategy result in unacceptable environmental impacts? It considers environmental aspects to sustainable development. The assessment considers the residual growth that would be necessary to meet the current strategy after completions and current commitments that are shown in table three are taken off. This gives a better indication of the impact of likely revised requirements on the environment in and around a settlement.
33. A high level environmental assessment is made in four topic areas:
 - Biodiversity
 - Flood risk
 - Heritage
 - Landscape
34. Each assessment highlights both threats and opportunities that might be delivered by rolling forward the current strategy at each settlement. An overall judgement reflects the risk of unacceptable harm resulting from the additional amount of development each settlement would need to accommodate. Levels of risks are graded from low to high (green is low; amber is moderate, red is high).
35. At this stage of plan making, without identifying specific directions for growth or sites for development, an assessment is necessarily a broad judgement. A high level of risk would suggest lower rates of growth than those suggested. A lower level of risk might suggest it could be acceptable or possibly higher. The assessment method is summarised in annex one. All judgements would be subject to further testing.
36. The rest of the HMA, outside Market Towns and Principal Settlements, encompasses the rural area of the HMA. It is not possible to make a judgement about this area because it is so extensive and diverse. The need to protect countryside and manage development to meet local needs will continue. Individually, settlements within the rest of the HMA will be expected to accommodate a small proportion of overall housing needs. Past planned and actual rates of housing and employment growth are a proxy guide to environmental risks at this stage of plan preparation and to what constitutes reasonable alternative levels. More detailed assessment will take place in later stages of plan preparation.
37. The conclusions in summary are shown in the table below:

	Biodiversity	Landscape	Heritage	Flood Risk
Chippenham	Green			
Malmesbury	Green	Red		
Calne	Yellow			
Corsham	Red	Red		
Devizes	Red	Red		Green
Melksham	Green			Yellow

Table 5 Environmental aspects of rolling forward the current strategy for 2016 - 2036

Conclusion

38. Both **Chippenham** and **Melksham** are relatively less constrained environmentally compared to others in the HMA. At Melksham there would be concerns about encroaching onto the rising ground to the east and conserving the landscape character of river corridors. A main concern at Chippenham is the potential impact on outlying rural settlements.
39. Scope for growth at **Calne** would need to be constrained to avoid impacts on the Area of Outstanding Natural Beauty and protecting the setting to Bowood Park and Garden and the character of the River Marden Valley. 'Stepping stone' woodlands to the west and south west, around Bowood may also be significant for bat species
40. Rolling forward the current strategy was seen as involving the most risk at **Corsham** and slightly less at **Devizes** and **Malmesbury**. Elsewhere risks were considered low or medium.
41. At **Malmesbury** it was considered challenging to implement the numbers without detriment to the setting and hence the character of the town itself. The historic town core, including the abbey and its setting, need to retain strong connections with countryside along river valleys from outlying countryside. Large areas of land are at risk of groundwater flooding resulting in minimal development opportunity and any development to have careful consideration of its impact downstream.
42. Groundwater issues are prevalent at **Corsham**. Green belt lies to the west and it has several landscape, notably the Cotswold Area of Outstanding Natural Beauty and heritage designations like Corsham Park that will constrain urban expansion. There are also key flight routes to and from hibernation and swarming sites for bats roosting and foraging to the south and south east of Corsham.
43. Similar constraints to development are necessary to protect bats at **Devizes**. Development would be extremely challenging due to the town being constrained by the Area of Outstanding Natural Beauty to the north and east and wooded slopes to the west and south. Expansion of the town could have harmful impacts on its setting, including to a conservation area and to castle fortifications.

Infrastructure constraints and opportunities

44. The provision of infrastructure necessary to properly support growth is an issue common to all the plan area. At this point, the capacity for the transport network and secondary education at each settlement are central infrastructure concerns. If there is a likelihood of fundamental infrastructure inadequacies or a need for substantial additional investment in these areas, then these factors should influence the formulation of alternative development strategies.
45. It will be more difficult to roll forward the current strategy if a new secondary school will be needed. The assessment estimates how many years before a new school will be necessary using implied rates of housing development arising from rolling forward the current strategy. Committed development and planned school investment have already been taken into account in this assessment.
46. Rolling forward the current strategy will be better supported by locating future development where it has the best access to a range of transport modes. The best performing settlement's will be defined by the following factors :
1. Have a Rail station
 2. Have direct access to the Key Bus Route Network
 3. Have direct access to Wiltshire's Road Freight Network / Primary Route Network
 4. Have a town Cycle Network
- 47.
48. Main settlements have therefore been classified per their access to a range of transport modes (a rail station, bus services etc). Settlements with access to all are graded five. Settlements that have 3 of any combination of the above are graded four and so on. Definitions of each are set out in annex 2.

Principal Settlement/Market Town	Education (years before a new secondary school)	Transport (settlement accessibility level)
Calne	42.2	3
Chippenham	13.8	5
Corsham	21.8	4
Devizes	25.4	3
Malmesbury	4.6	4
Melksham	12.8	5
Rest of HMA	n/a	1-2

Table 6: Education and Transport constraints of rolling forward the current strategy for 2016 - 2036

49. Growth at **Malmesbury** could be constrained by the need to increase secondary school capacity. Elsewhere new secondary schools would be needed in over a decade's time.
50. An impact of rolling forward the current strategy could be an increase in road traffic in the rural area due to the relatively poor access to alternative modes of travel compared to the main settlements, although this indicator is less useful given it involves a large area and there may be areas that perform better individually.

51. Given the increase in local housing needs there is likely to be significant concerns about pressures on the network from traffic growth.

Conclusion

52. The lack of secondary capacity at **Malmesbury** is a possible constraint to future growth. **Chippenham** and **Melksham** might also require further capacity to support growth in the second half of the plan period.
53. The size of the increase in growth carrying forward the current strategy, would be likely to create widespread concern from the local community about the impact of traffic growth on local networks.
54. In terms of transport infrastructure, Chippenham and Melksham appear the best served settlements in the HMA possibly indicating potential for higher growth.

Public consultation

Issues Consultation 2017

55. The Council consulted the public in November 2017 on a number of strategic issues the plan might need to address. Issues were articulated for each HMA and there were ones specific to a settlement. It was also an opportunity to raise new issues. A full summary of the results of the consultation is contained in a set of separate reports. The following table sets out some of the key findings.
56. The current strategy can be compared to these issues and assessed to see whether alternatives need to be considered. The level of support for growth from business, developers and landowners is a factor. For example, the scale of land being offered for development at a particular place can play a large part in determining how much growth is realistic. It is also important not to rule out reasonable opportunities suggested as a result of public consultation.

Town	Issue	Consultation response
Chippenham	Should the continued growth of the town be of a scale and location to provide a new road linking the A4 to the A350?	<p>There is recognition that a link road from the A4 to the A350 could be beneficial. There were differences of view over the benefits and costs of possible eastern and southern routes.</p> <p>Transport was raised frequently as a topic, generally as a constraint to growth pointing to the need for investment.</p>
Chippenham	How can a strategy for the town ensure redevelopment opportunities are maximised?	Additional sites would help to address delays building on some current sites for development already allocated. . Further work should understand and combat reasons for under-performance. A common suggestion was a greater mix of sites. The need to utilise land such as police station and Bridge Centre was voiced.
Chippenham	Constraints to development must be recognised	<p>The following constraints were raised frequently:</p> <p>Lacock village</p> <p>River Avon corridor/River Marden valley.</p> <p>North Wiltshire Rivers Cycle Route.</p> <p>Leisure and Recreation</p>
Chippenham	How should the town's development relate to the advantages offered by Junction 17 on the M4?	<p>Development opportunities around J17 of the M4 do not lie on any strategic commercial public transport corridor.</p> <p>Alternative strategies should try to assist the development of existing strategic bus corridors.</p>

Town	Issue	Consultation response
Calne	What should be the future strategy of the settlement? For instance, could higher rates of growth stimulate more investment in the town centre?	<p>The town could continue to play a complementary role to Chippenham as a focus where development is being delivered. However, this was a minority view. A large number of responses pointed out that over the past 10 years Calne has seen a 25% increase in its population. During this time the levels of employment and job opportunities have not reflected this growth which has led to a number of concerns, namely; air quality, excessive car travel/ownership and congestion.</p> <p>Overwhelming response suggesting that any future development should help develop the vitality of the Town Centre and invest in its regeneration.</p>
Calne	Are there other approaches that could be taken to the town's development that can address traffic issues and improve air quality?	<p>Continuing strategy would exacerbate current employment and housing imbalance</p> <p>Specific constraint on future development and the main current problem coming from representations was the congestion of the town centre and Curzon Street/Wood Street.</p> <p>An opportunity widely suggested was that planning further development should open up the opportunity of an eastern relief road.</p>
Corsham	Should further growth be geared to support re-opening the rail station?	<p>Train Station was named as a major opportunity and something development should be geared towards supporting.</p> <p>Transport planning was, however, a broader issue and concerned access to Bath in particular:</p>

Town	Issue	Consultation response
		<p>Bus services: along A4 corridor. Belief that Corsham should be treated as being in a closely related functional area with Bath – which will have significant effects on Corsham.</p> <p>Congestion: Suggestion that congestion west of the town at Box and within BANES requires imaginative solutions if already severe problems are not to be exacerbated.</p>
Corsham	What growth might attract more investment in the town centre?	<p>Growth would support investment and should be coordinated to improve the town centre and make it more attractive – improving employment opportunities including a second supermarket.</p> <p>It was noted that Corsham lies on a ‘primary route network’, a strategic bus route and has a potential railway station. It is the closest settlement of any notable size to Chippenham and represents the most logical alternative settlement to account for and supplement under delivery at Chippenham.</p>
Devizes	What should be the future strategy of the settlement? Should it prioritise measures to support more affordable homes and stimulate greater economic development?	<p>It was widely suggested that future development needs to encourage employment investment in the local area. The suggestion arose that the lack of recent employment growth in the area may be a symptom of smaller residential allocations coming forward in the town more recently.</p> <p>It was generally reported that the future strategy for Devizes should be to prioritise employment growth through the allocation of larger urban extensions in suitable locations around the town to stimulate greater economic led development.</p> <p>It was suggested that the main issues for Devizes were due to the recent lack of strategic sites in Devizes, with a suggestion that small sites are not capable of providing the infrastructure needed to begin to solve the highlighted problems.</p>

Town	Issue	Consultation response
		<p>Devizes was therefore proposed as a suitable location for strategic housing and employment development over the plan period, to try to provide some of the infrastructure needed.</p> <p>Opinion seemed to indicate that there is a general appetite/need for affordable housing within Devizes.</p> <p>Other representations highlighted the main constraints affecting the potential for growth at the town.</p>
Devizes	<p>Are there other approaches to the town's development that can address traffic issues and improve air quality?</p>	<p>Air quality was widely mentioned as a problem. Traffic congestion is a big issue and a potential obstacle to future growth. Invest in road infrastructure needed to relieve this.</p> <p>It was suggested that large strategic sites, whilst having the potential to increase vehicle usage, provide the opportunity for highway improvements (secured through section 106 obligations) which may improve traffic flows - in turn reducing air quality issues caused by congestion.</p>
Malmesbury	<p>What should be the future strategy of the settlement? Are there approaches to the town's development that could help diversify the local economy?</p>	<p>A significant decrease in self-containment was reported – suggestions arose that new housing allocations should be delivered alongside employment (making use of the strategic links to Chippenham and Swindon) to help improve self-containment.</p> <p>The town has attracted significant inward investment but continues to rely heavily on a single employer. The town however is well located to attract more development.</p>

Town	Issue	Consultation response
		<p>Many comments pointed to constraints at the town including: impact on the character of the town, growth potentially overwhelming its services and infrastructure.</p> <p>Impacts on heritage and tourism – the Core Strategy describes Malmesbury as having a "high quality built and natural environment" which must be protected</p> <p>South and east Malmesbury is constrained by floodplain and AONB to the east</p> <p>Preserving the individual character of the town needs to be recognised as a constraint on development</p> <p>The town offers very little public transport that can credibly compete with car use, and the distances to higher-order settlements are relatively long (development strategy could align with a wider public transport plan).</p>
Melksham	How should town centre regeneration opportunities be realised?	Widely stated that there is a need to regenerate the town centre, encourage a wider variety of employment opportunities into the town and possibly pedestrianise parts of the town centre. Suggested that investment must continue in town centre and brownfield opportunities must be maximised.
Melksham	Should the current strategy for the town be continued or should there be a different approach? What contribution could the restoration of the canal make to the town's future?	<p>A number of representations suggested that the town's characteristics (large employment centre, proximity to larger settlements, strategic road links, railway station, historic high delivery rate) lend itself to a continued large level of growth. This was taken further in one representation that suggested Melksham should be elevated in the settlement hierarchy.</p> <p>On the other hand, it was suggested that there should be consideration given to the possibility of locating development on a large scale closer to the M4 in the shape of a new settlement.</p> <p>Comments suggested that the future strategy for Melksham should focus on employment provision -- providing land to encourage further large employers to the</p>

Town	Issue	Consultation response
		<p>area. Providing a wider employment base for a variety of skill levels may assist in discouraging the high level of 'out commuting'</p> <p>Large amount of support for the restorations and preservation of the Wilts & Berks canal.</p> <p>Widely reported that development can help contribute to enhanced transport network including improvements to railway station, bus network and eastern road link.</p>
HMA	<p>The SHMA suggests an increase in housing needs. Do settlements in the HMA have the potential for economic development to support balanced growth? If not and it is then decided that not all the suggested housing need should be met in the HMA, where else should the remainder be met?</p>	<p>It was suggested that there were opportunities to develop the former Hullavington RAF base into a new village or market town, especially as it has good links to the M4 and railway links and would solve many housing challenges within this HMA.</p> <p>There was no consideration of the role and function Larger Villages can perform in accommodating some of the housing requirement over the Plan period</p>
HMA	<p>Are some settlements much more constrained? Are some settlements more suited to growth than others? If so, which ones would be and why?</p>	<p>Malmesbury has the most reported range of individual environmental constraints although analysis shows Corsham the most constrained by type.</p>
HMA	<p>Is there scope to bring about more re-use of brownfield sites to limit the loss of greenfield land? If so, how could this be realised?</p>	-

Town	Issue	Consultation response
HMA	What would be the effect on commuting patterns of higher rates of house building? Looking to 2036, what should be the key investments in transport?	Key investments: Link roads (Chippenham, Melksham) Inter-urban bus services Rail stations (Corsham and Melksham)

Table 7 Summary of consultation responses

57. In 2017 the Council also consulted on the evidence base underpinning the then proposed Swindon and Wiltshire Joint Spatial Framework. The Functional Economic Market Area Assessment (FEMAA) informs the evidence on economic growth in each of the FEMAs which in turn can be aligned with the Housing Market Areas.
58. The responses relevant to the Chippenham HMA highlight the need for growth at market towns and in rural parishes. It was also queried what the Council's intervention strategy is to deliver employment at Chippenham. Responses emphasise the need to consult the business community and specialists on what land is required where to attract key sectors to the Wiltshire area.

Town and Parish Workshops on Distribution of Growth

59. Informal consultation took place between October and November 2018 with local members, town and parish councils and representatives of neighbourhood plan groups at which preliminary findings were presented as a basis for discussion. Discussions are summarised below alongside how they influenced the development of alternative development strategies.

Settlement	Summary
Calne	<p>The exercise emphasised a general consensus to prioritise employment growth given recent failures to deliver this alongside housing. In terms of new housing, concern was voiced that it may add to current infrastructure constraints without providing any solutions. Options for higher growth were discussed to enable the delivery of road infrastructure to relieve congestion in the town centre and Air Quality Management Area (AQMA) within the town. Alternatively, options for lower growth were also discussed to try and avoid a worsening of the current situation.</p> <p>Higher growth options are represented in levels to meet increased assessed need (see Table 1 above). It would also be appropriate to test lower growth options.</p>
Chippenham	<p>Potential for significant growth supported by strategic road investment that could form a new boundary to the town on the east and south was recognised by some; integral to this was high quality design with green infrastructure and recreation routes linking existing community to countryside. Areas were identified that could accommodate the residual level of growth identified at this stage. There was a broad move to place development towards the south and south east of the town with the remaining numbers being accommodated by the odd site around the periphery of the settlement boundary along with a significant number within the town itself in the form of brownfield development. However, a number of potential constraints were highlighted in attempting to accommodate the level of growth being proposed including the loss of agricultural land, impacts on air pollution, building in flood risk zones (and the impact of climate change on this constraint), traffic congestion, the capacity of the road infrastructure to adapt and accommodate this level of growth along with concerns over the viability of the solutions to the current levels of congestion within the town. There was more support for a southern link road which was seen as a more viable solution to relieve current congestion.</p>

	<p>There were no additional, previously unidentified, constraints and issues to suggest higher growth options should not be tested.</p>
Corsham	<p>Discussions identified that new housing should be located with good access to town centre facilities which supported existing public transport and was a reasonable distance to primary schools. However, it was also identified that the proposed growth may lead to existing facilities and road infrastructure becoming increasingly under pressure, with the Corsham Train Station considered unlikely. Furthermore, there were concerns that the community feel quality of life would be worsened due to the potential development of open space and large housing estates.</p> <p>The range of concerns put forward supported assessment thus far and testing lower growth option.</p>
Devizes	<p>The exercise emphasised a concern over infrastructure capacity, specifically road infrastructure. It was also identified that when accommodating housing growth, new facilities should be delivered alongside the development, namely but not exclusively, road infrastructure, medical and education provision.</p> <p>The range of concerns put forward supported assessment thus far, emphasising issues with local infrastructure capacity and support for testing a lower growth option.</p>
Malmesbury	<p>It was agreed that the housing figure identified was appropriate for the town given the number of constraints that were highlighted. Land was identified at Malmesbury, using a combination of brownfield sites, some already being promoted for redevelopment, to accommodate the current indicative figure. Concerns were voiced over the capacity of education, impact on Abbey views and the need for better transport infrastructure including car parking provision.</p> <p>Generally supported the assessment thus far and that it would also be appropriate to test lower growth options.</p>
Melksham	<p>It was felt that the town had taken significant growth in recent years with a lack of infrastructure including medical provision. The importance of delivering infrastructure before any large-scale future growth could be accommodated was emphasised. This included a specific focus on the provision of an eastern bypass, without which it was felt development would be difficult to accommodate. Other constraints included education provision (and the need for a new secondary school) and the improvement of transport infrastructure, not only roads but also sustainable transport options and the improvement of the railway station.</p> <p>There were no additional, previously unidentified, constraints to suggest that higher growth options should not be tested where these included significant infrastructure provision, notably the possibility of an eastern bypass.</p>

Table 8 Town Summary of Town and Parish Workshops on Distribution of Growth

Conclusion

60. In terms of future growth prospects, there was a different outlook for each main settlement, there was widespread concern about the impacts of growth on the local environment.
61. Where higher growth was promoted or recognised as a possibility, there was commonly a focus on the infrastructure necessary to support it. Sometimes, a specific element of infrastructure could be a result or a pre-requisite. At **Corsham**, an alternative with higher rates of growth than continuing the current strategy was linked to transport investment (a rail station, better inter urban bus services). At **Chippenham**, when large scale development and higher rates of growth suggested a long-term strategy this would involve significant infrastructure investment and relief road connection of the A4 to A350. Employment land delivery was also a key issue. **Melksham** was also considered in the same vein as a candidate for a large scale and long-term strategy and higher growth rates than current strategy.
62. Elsewhere, there were stronger suggestions for periods of consolidation, such as at **Calne** and **Devizes**, or for less growth because of constraints as in the case of at **Malmesbury**. There were, however, arguments for less restriction on housing development at villages in order to better support rural communities.

Assessment of potential scales of growth

63. The comparisons look at social and economic aspects of sustainable development, how much forecast economic growth and how the distribution of housing needs matches the pattern of development rolling forward the current strategy.
64. A first comparison, however, looks at how achievable and realistic it is to roll forward the current strategy – is it deliverable? This can provide insight into the range and scope of alternatives that should be tested.
65. There are therefore three sets of comparisons:
 - **Deliverability** - Would the current strategy be capable of being delivered in terms of housing and employment?
 - **Economic aspects** - Would the current strategy match jobs and prospects for economic growth?
 - **Social aspects** - How well would the distribution of housing match where people live? Is it capable of meeting different needs for homes – in particular affordable homes

Deliverability

Do recent trends, current commitments and available land indicate that the current strategy can be delivered?

66. Whether a future strategy is realistic and achievable depends upon several factors. This section looks at three:

Trends - Past development trends: if past rates of development at a settlement have been much lower than expected then this may indicate there would be issues to resolve. The higher the increase in rates necessary to roll forward the current strategy the less realistic this strategy may be. Conversely, the less an increase the more realistic it may be.

Land availability - Land committed: a proportion of the growth envisaged is already in the pipeline. This would show whether continuing the current strategy was more achievable at some places and less at others. The less land still needing to be identified the greater the prospects are that the current strategy can be delivered.

Land availability - Land promoted for development: a large or small amount of land may be being promoted for development but not allocated or have consent. This may limit or widen options for growth and the amount can show whether the current strategy was reasonable. Levels also provides a market signal of commercial interest. The more land promoted the greater the scope and therefore prospects of delivering the current strategy.

67. Land promoted for development is recorded in the Strategic Housing and Employment Land Availability Assessment and this can be used to provide a broad estimate of the scale of development that can be considered at each settlement and how soon it could be made available. Some areas have been considered in previous plans. Others have been promoted more recently; for instance, as a response to a call for sites and consultation as a part of plan preparation.

Housing

68. Meeting forecast housing needs in the HMA requires a substantial increase in rates of house building. This raises the question of whether the scale of need can be delivered rolling forward the current strategy.
69. **Trends – past development trends:** A step change in delivery would be needed. Development everywhere in the past ten years has been much less than that forecasted over 2016 -2036, but the extent varies from place to place. The graph below shows how much house building has been below what would be needed to roll forward the current strategy. Rates of housing development at **Chippenham** and **Corsham** have been considerably lower. Rolling forward the current strategy would require house building rates to nearly treble at Chippenham and increase by 54% at Corsham.
70. On the other hand, rates of development at **Calne** and the **rest of the HMA** have not been far below what would be necessary to meet their share of forecast housing need.

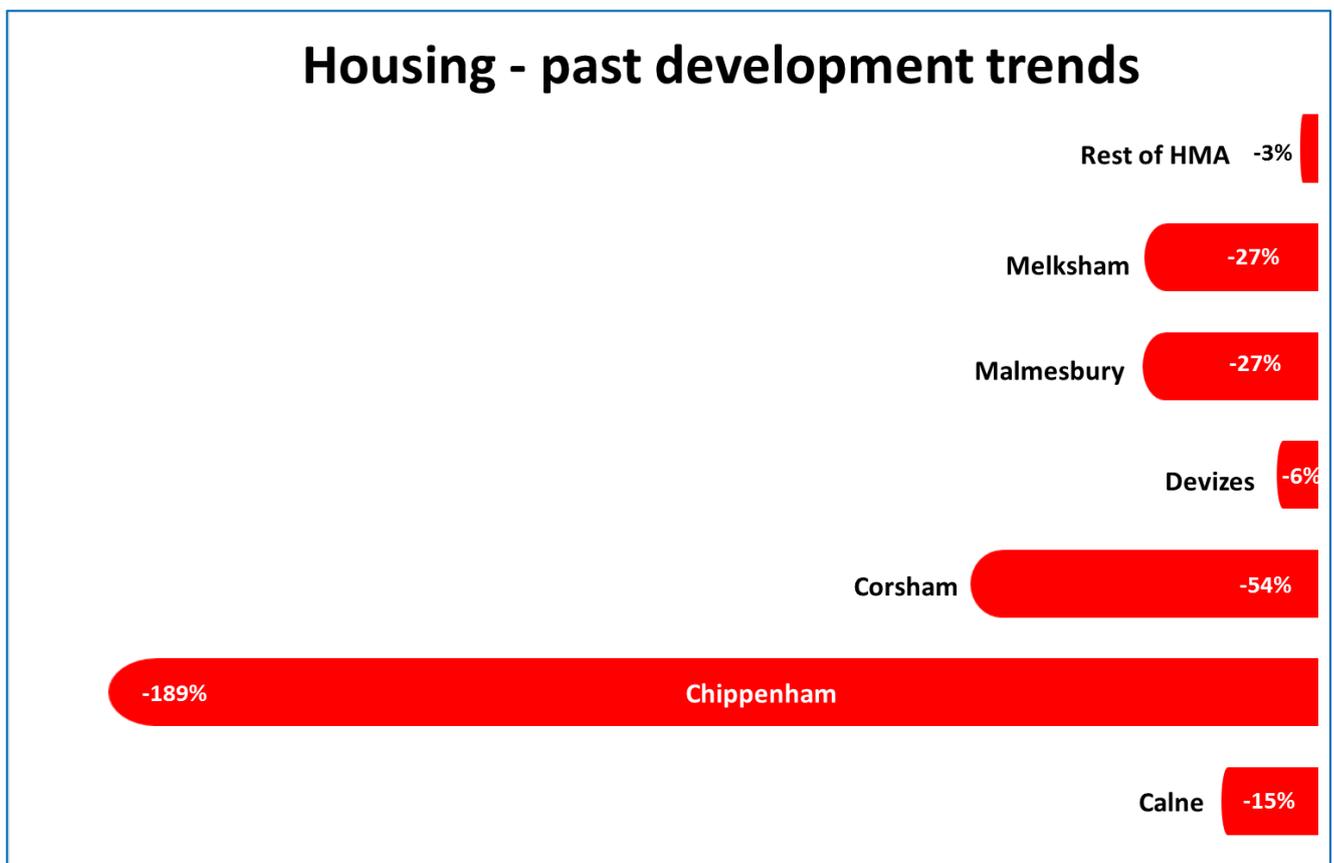


Figure 3 Housing - development trends (2006-2018)

71. However, there have been very low rates of house building in Chippenham in recent years because (until recently) there has been little land available for development.
75. **Land availability - Land committed:** Land supply at Chippenham has only recently been addressed through the preparation of the **Chippenham** Site Allocations Plan and now more than two thirds of the land that would be needed to roll forward the current strategy has been built, has permission or is allocated in a plan.

76. The graph below shows how much of the land needed to roll forward the current strategy is already in the pipeline at 1 April 2018.

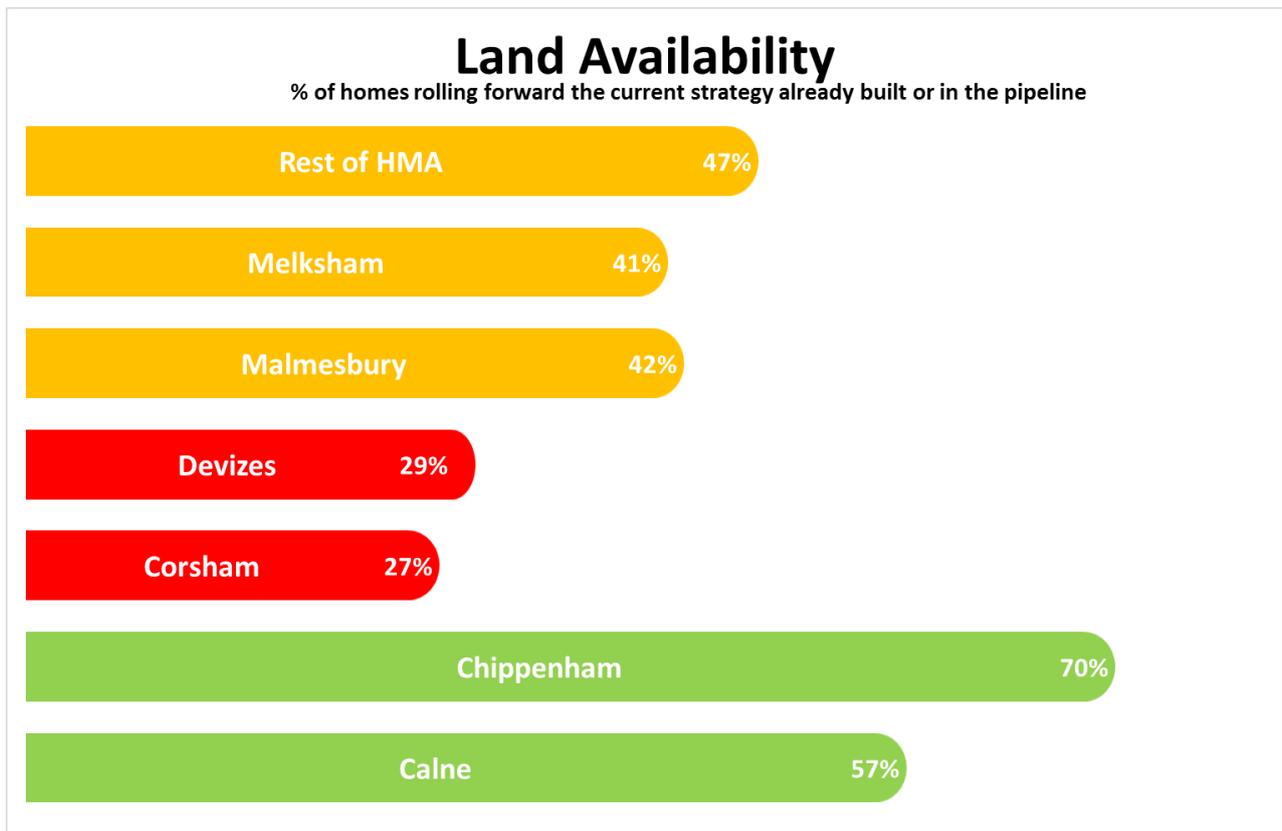


Figure 4 Housing land availability (2018)

77. Unlike Chippenham, **Devizes** and **Corsham** each have less than a third of the land needed to roll forward the current strategy. Whereas the **rest of the HMA** has just under half.
78. **Land availability - Land promoted for development:** To varying degrees, it will be challenging to increase housing delivery in the HMA. A substantial proportion of the land necessary to achieve higher rates of development has yet to be identified. This increases uncertainty.

Table 9 Housing land availability (2018)

Principal Settlement/Market Town	Outstanding Planning Permissions at April 2018	Outstanding Allocations at April 2018	Developable Supply 2018-2036	Land promoted for development ¹³			Total
				Short term	Medium term	Long term	
Calne	810	20	830	2245	4055	745	7045
Chippenham	2779	1655	4434	19740	6180	3195	29115
Corsham	395	0	395	2755	545	1250	4550
Devizes	447	200	647	4070	4145	580	8795
Malmesbury	83	209	292	1690	1190	60	2940
Melksham	1047	0	1047	12085	2400	205	14690
Rest of HMA	748	300	1048	-	-	-	-
Total	6309	2384	8693	42585	18515	6035	667135

79. Looking at the scale of land promoted for development, there does appear to be a larger pool of land opportunities at **Chippenham** and **Melksham**, whilst there is a smaller pool at **Malmesbury**.
80. The amount of land potentially available for development only gives one broad indication of deliverability. Further much more detailed assessment is necessary, but it can be inferred that the more opportunities there are, the greater will be choice and competition improving the chances of higher rates of house building being achieved.

Employment

81. **Trends - Past development trends:** If the pattern of employment development that has taken place differs to what the current strategy intends, this might indicate the need for alternatives. Employment land requirements can be distributed within the HMA according to the pattern of recent development and compared to the distribution suggested by rolling forward the current strategy. The graph below highlights the differences.
82. This comparison shows that **Chippenham** is underperforming in terms of the employment development that was envisaged. The same applies to the market towns of **Calne** and **Devizes**.

¹³ Strategic Housing and Employment Land Availability data, Wiltshire Council. An approximation of dwellings is estimated on the number of units on the site area which is suitable (i.e. not subject to constraints such as Green Belt, Flood Zones, wildlife/environmental constraints) at a density of 30-45 dwellings per ha.

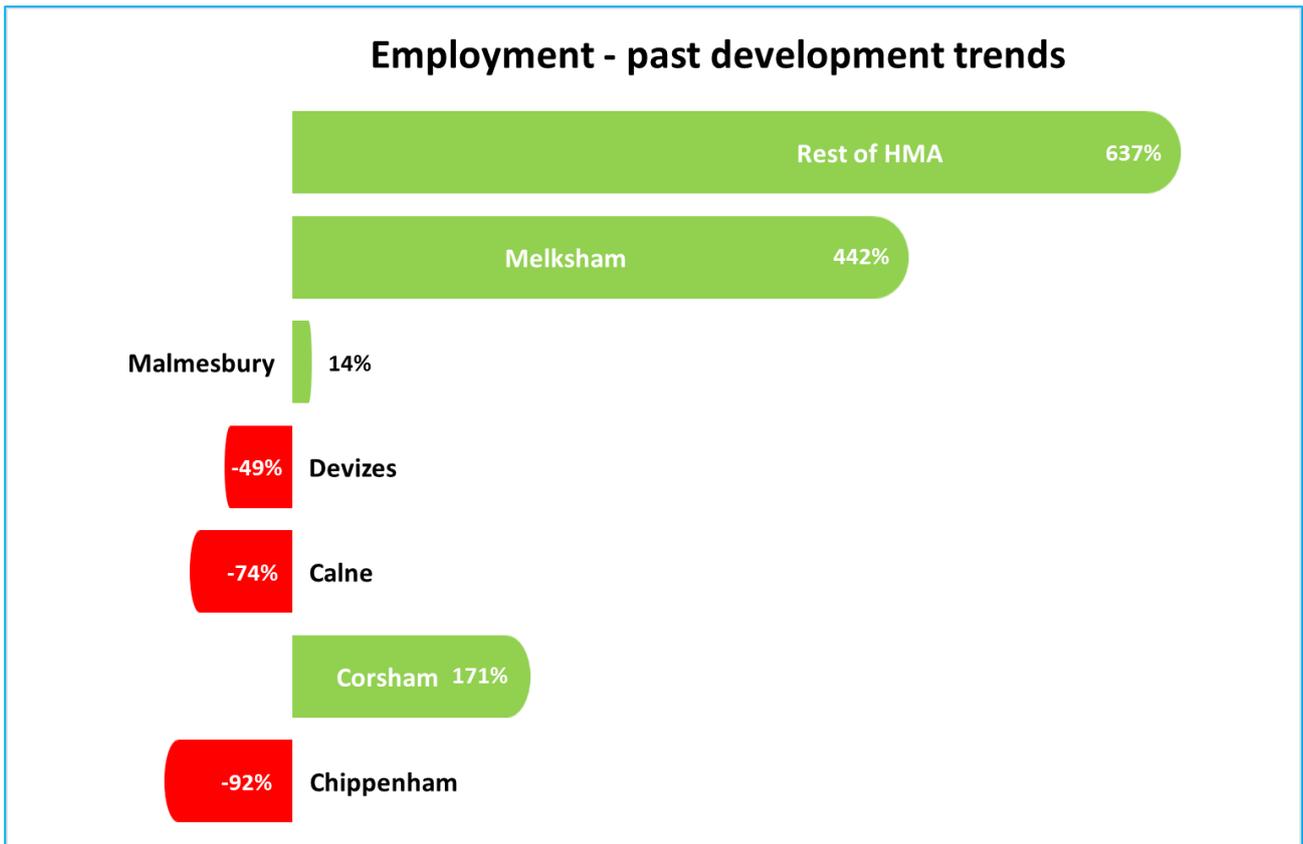


Figure 5 Employment - past development trends (2006-2018)

83. By contrast both the **rest of the HMA** and **Melksham** have experienced higher rates of employment development than envisaged in the current strategy. This might suggest that they should plan for over and above the level of growth in the current strategy. Four times the amount of land allocated in the current strategy was built on in Melksham. No employment land was allocated in the rest of the HMA so any such development would report a significant percentage increase. However, the ELR does note there are a significant number of jobs in the rural areas¹⁴.
84. **Land availability - Land allocated or with consent:** Further evidence that complements these findings can be drawn from 'deliverable supply' i.e. unimplemented planning permissions and plan allocations for employment development considered capable of delivery within five years. This may point to investments in the pipeline that might also suggest change in a local economy and market preferences.
85. If a high proportion of land needed to roll forward the current strategy is already in the pipeline, then this suggests exploring alternatives for higher amounts of employment land. Where the opposite occurs, this might indicate alternatives for less growth.
86. The graph below shows the substantial land supply already in the pipeline, including unimplemented permissions and outstanding deliverable allocations in development plans. Corsham, Calne, and Melksham would be the only settlements requiring additional employment land to be identified to carry forward the current strategy. Corsham and Calne

¹⁴ ELR (2018), Appendix 3, Figure 9. This is common to all HMAs.

both did not benefit from specific land allocations in the Core Strategy. While Corsham has seen growth in connection with the Joint Cyber Command project, delivering new land within the vicinity of the town, there is very little additional employment land in the pipeline at Calne. Melksham’s allocations are partly built out and additional land would therefore be required. Malmesbury currently has additional deliverable supply due to outstanding allocations and completions recorded in 2017 linked with Dyson.

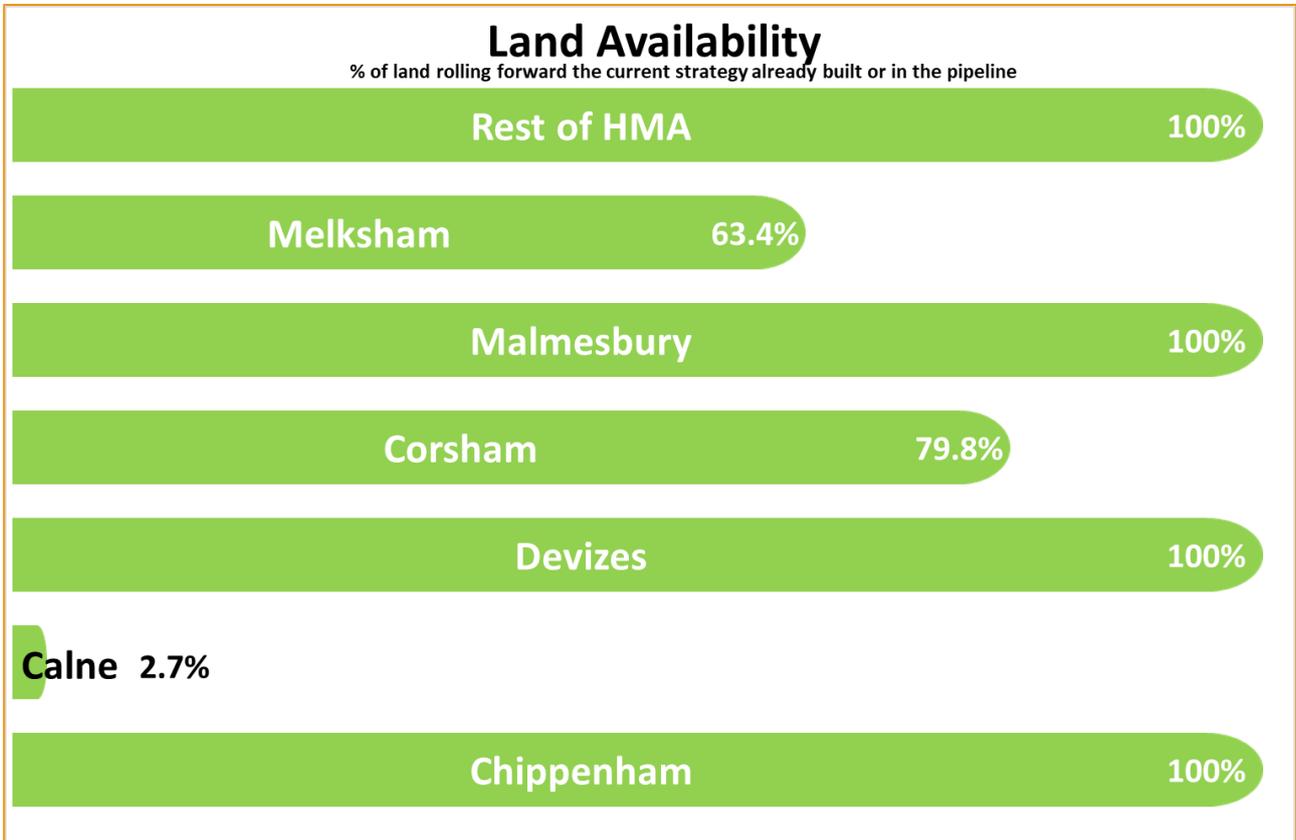


Figure 6 Employment Land Availability (2018)

- 87. Devizes has sufficient deliverable supply but this largely depends on the delivery of a single site (Land between Horton Rd and the A361).
- 88. The remainder of the HMA has sufficient supply to meet current strategy requirements.
- 89. The analysis of deliverable supply also shows that despite the historic trend the strategy remains deliverable for Chippenham. This is due to granting permission for the majority of employment site allocations in the adopted Chippenham Site Allocations Plan.¹⁵

Economic Aspects

How would growth be distributed if it was led by forecast employment land needs?

- 90. The ELR produced different scenarios for the demand for employment land over the plan period¹⁶. Scenarios are based on the current distribution of employment, past job growth and

¹⁵ The analysis does not include the major permission granted at Chippenham Gateway (Junction 17) which is considered to be an exception site in line with Core Policy 34 of the Wiltshire Core Strategy.

¹⁶ Employment Land Review, Appendix 5 page 14

market signals. This comparison provides some insight into how the distribution might need to be different to rolling forward the current strategy in terms of both housing and land for employment development.

Housing

91. Economic forecasts, produced by the ELR, provide a distribution of job growth that can be translated into a distribution of housing requirements within the HMA. This is compared to the distribution that results from rolling forward the current strategy. Comparing one with the other can indicate where the prospects for growth of each settlement, in terms of economic development, may differ from those suggested by the current strategy direction.
92. Economic growth less than the current strategy can imply less settlement self-containment. Lower housing growth might constrain future economic growth and increase local affordability issues. Worsening imbalances either way implies increased levels of commuting.
93. There are some settlements where economic prospects would not appear to match those implied by rolling forward current strategy.
94. At **Calne**, prospects for job growth indicate there should be lower rates of housing development than rolling forward the current strategy.
95. At **Chippenham** the scenario shows quite modest growth trends behind strategy expectations. However, the Employment Land Review suggests that a main reason for this has been a lack of land available for business development (Appendix 5.1, para 4.3.1). The situation is similar to housing delivery (above). The Review indicates a strong market demand due to the proximity to M4 (Junction 17), very different to past trends, and when this is factored into forecasts, prospects exceed levels indicated by continuing the current strategy. This supports higher rates of house building.
96. Both **Corsham** and **Malmesbury** show stronger prospects for job growth that also suggest higher rates of housing development than rolling forward the current strategy.

Housing - economic forecasts

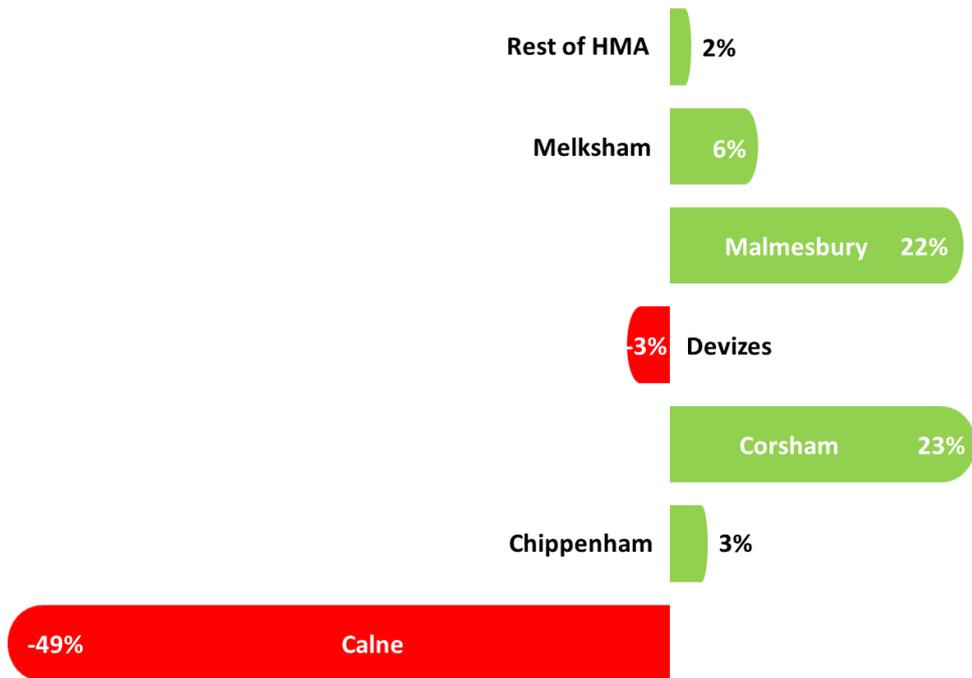


Figure 7 Housing - economic forecasts

Employment

97. For employment, the Employment Land Review scenarios broadly support the findings of the previous analysis for **Melksham**, **Corsham** and the **rest of the HMA** which suggest an employment land provision needing to be higher than under the current strategy. They also confirm the outlook for **Calne** and **Malmesbury** which are forecast to see lower growth than under the current strategy.
98. **Chippenham** would see lower employment land growth compared to rolling forward the current strategy, but higher compared to following past trends. The market-led scenario for the town broadly accords with the current strategy which dovetails with the evidence on market interest in the strategic sites by way of planning permissions.
99. **Devizes** is forecast to see higher growth compared to the rolling forward of the WCS strategy.

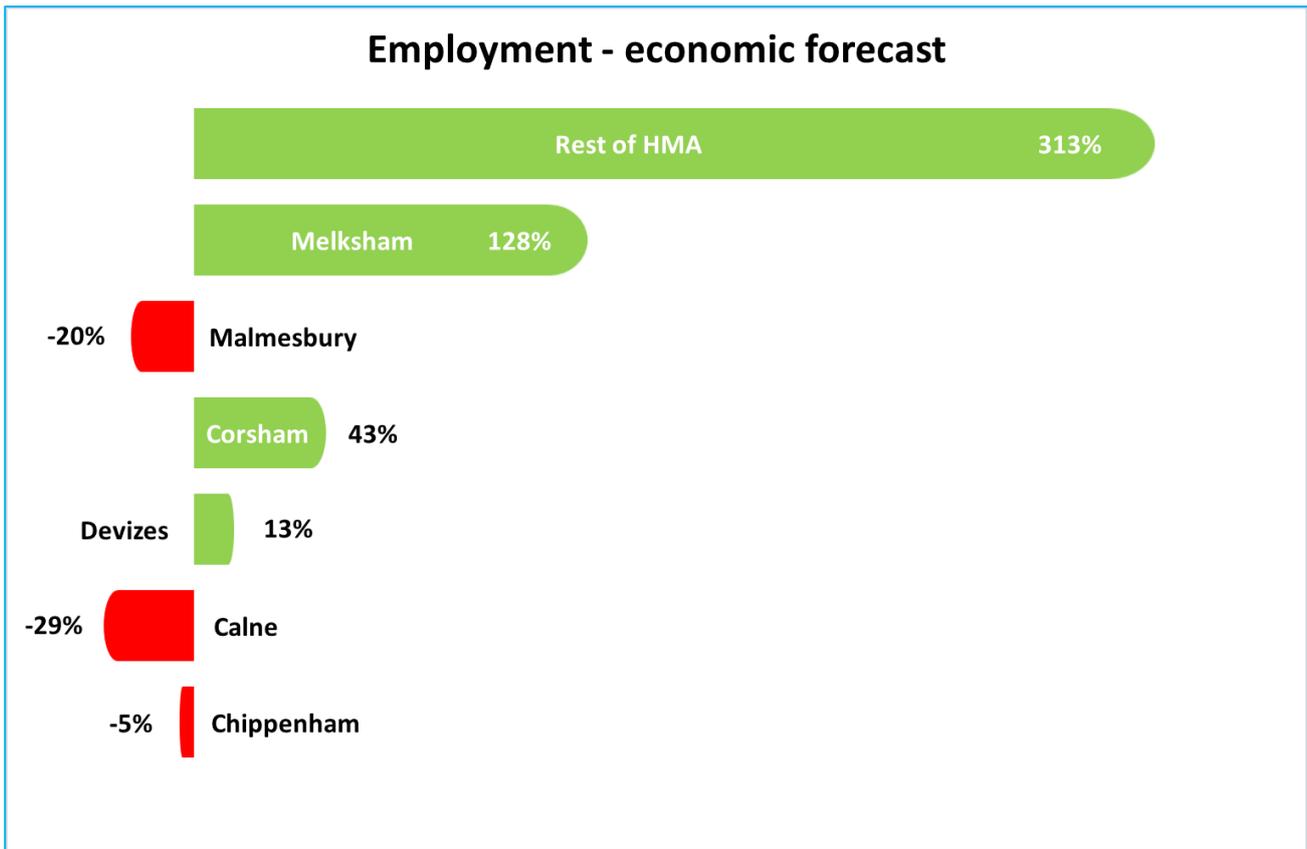


Figure 8 Employment - economic forecasts under ELR market-led scenario

100. Levels of growth forecast to be lower than under the current strategy would not necessarily result in no new employment land. Lower growth indicates that the current level of growth may not be capable of being sustained but some additional employment land up to 2036 may still be required.

Social Aspects

How well does the distribution of housing match where people live and registered affordable housing needs?

101. **Population** - This analysis compares the population distribution of the HMA to the distribution of housing if the current strategy was rolled forward.
102. Most needs for new homes will arise where most people live. The analysis shows how much the current population distribution suggests a higher or lower proportion of growth than that suggested by rolling forward the current strategy.
103. **Affordable housing** - Delivering affordable housing is an important outcome sought by the Local Plan. The housing register, at any point in time, provides a snapshot of the distribution of the need for affordable dwellings. The analysis compares a distribution based on need, as expressed on the register, with rolling forward the current strategy and suggests where the scale of growth might need to be higher or lower.
104. **Population** - The most striking conclusion of a comparison with the distribution of population, is the proportion living in the **rest of the HMA**. It indicates potentially that a greater allowance for new homes should be made for rural settlements.

105. Elsewhere, as a result of the large proportion of the population living outside main settlements, the comparison therefore suggests less growth in the main towns, but **Malmesbury** and **Corsham** are exceptions. **Devizes** appears to have more growth rolling forward the current strategy than is suggested by its size alone.

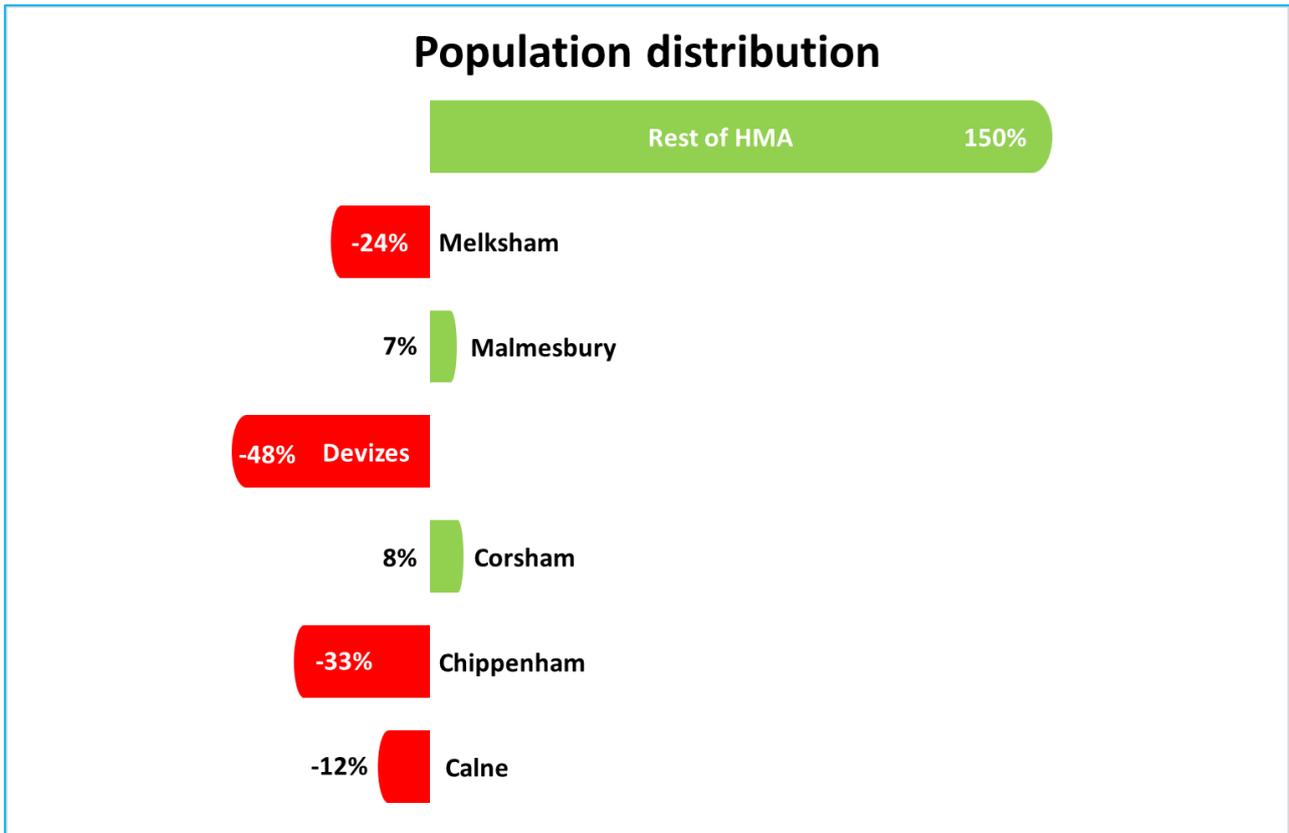


Figure 9 Housing - population distribution (est 2016)

106. **Affordable housing** - The pattern of needs for affordable housing, as measured by a snapshot of preferences¹⁷ listed on the Council's housing register, suggest a much higher level of need at **Devizes** and to a lesser extent **Calne**. There does not appear to be so significant a need for affordable housing in the **rest of the HMA**. **Melksham** also appears to have a lower need compared to elsewhere.

¹⁷ Preferences on the register at September 2017

Affordable housing

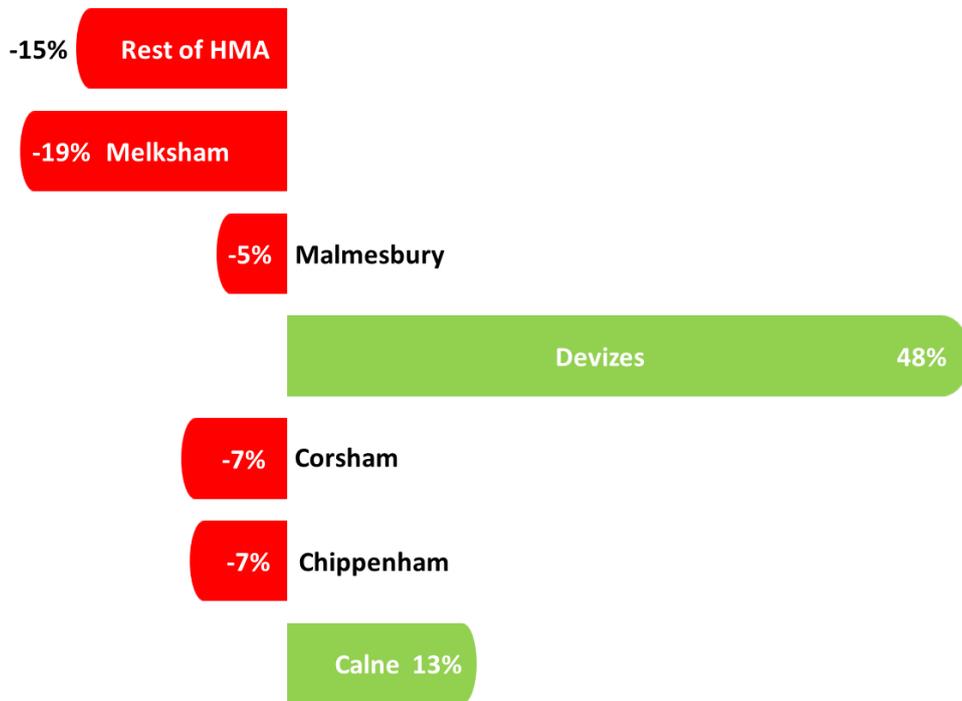


Figure 10 Housing - affordable housing (Sept 2017)

Development of Alternative Development Strategies

107. The information collated in relation to the 'place based assessment' and 'potential scales of growth' use a baseline of rolling forward the current strategy. The results are summarised in the table below and an informed planning judgement is therefore made on what alternatives to test:

	Place based assessment							Assessment of potential scales of growth					
	Environmental aspects				Infrastructure			Deliverability		Economic aspects		Social aspects	
	Biodiversity	Landscape	Heritage	Flooding	Education	Transport	Consultation	Trends	Land availability	Housing	Employment	Population	Affordability
Calne	Yellow	Yellow	Yellow	Yellow	Green	Yellow	Red	Yellow	Yellow	Red	Red	Yellow	Green
Chippenham	Green	Green	Green	Yellow	Yellow	Red	Green	Red	Green	Green	Green	Red	Yellow
Corsham	Red	Red	Red	Red	Green	Green	Yellow	Red	Yellow	Green	Green	Yellow	Yellow
Devizes	Red	Red	Red	Green	Green	Yellow	Yellow	Yellow	Red	Yellow	Red	Red	Green
Malmesbury	Green	Red	Red	Red	Red	Green	Red	Yellow	Red	Green	Red	Yellow	Yellow
Melksham	Green	Green	Green	Yellow	Yellow	Yellow	Green	Yellow	Yellow	Yellow	Green	Yellow	Red
Rest of HMA	n/a					Red	Green	Yellow	Green	Yellow	Green	Green	Red

Indicators for growth	
Higher	
Neither higher or lower	
Lower	
No information	

Table 10 Summary of results

108. The assessment takes into consideration economic, social and environmental factors as well as delivery and infrastructure constraints. A settlement might accommodate less growth because of the high risk of unacceptable impacts on a nationally protected habitat. The assessment may show little evidence to change the current strategy, but in some cases the results could also pull in opposing directions. There may be forecasts to support increased growth, but environmental or infrastructure constraints also suggest less. In summary, the assessment process suggests alternatives that should include the following:

Principal Settlement/Market Town	Summary conclusion	Higher or Lower than rolling forward the current strategy
Chippenham	<p>Environmentally, the area is less constrained than elsewhere.</p> <p>Consultation responses point toward alternatives for a larger scale development and higher rates of growth that would involve significant infrastructure investment and a relief road connection off the A4 to A350. This might help to mitigate transport concerns. An alternative strategy that supported this approach can be tested.</p> <p>Employment growth prospects also indicate some scope to consider higher rates of growth, on the basis that business and job growth has been</p>	Higher

	<p>suppressed because of a lack of land available for development. It would be appropriate to include an alternative strategy with growth higher than rolling forward the current one..</p>	
Malmesbury	<p>Good prospects for continued economic growth contrasts with extensive environmental constraints. Constraints extend to local infrastructure and a relatively restricted pool of land available for further development.</p> <p>Consultation responses divided between higher and lower growth, largely taking either side of conflict along economic versus environmental lines.</p> <p>Rolling forward the current strategy involves a pro-rata increase on past requirements. In this context it would be appropriate to test a strategy that included a lower rate of growth.</p>	Lower
Calne	<p>Environmentally, there appear to be no fundamental barriers.</p> <p>Local infrastructure capacity seems in a similar position. Public consultation raised concern over recent rates of growth and further development pressures, pointing to the dormitory role of the town. Developer interest in the town continues.</p> <p>Prospects for economic growth do not appear to match the scale of housing growth envisaged rolling forward the current strategy. This would underline concern expressed over the changing character of the town.</p>	Lower

	<p>Rolling forward the current strategy also involves a pro-rata increase on past requirements. In this context it would be appropriate to test a strategy that included a lower rate of growth.</p>	
Corsham	<p>The settlement appears the most environmentally constrained of all the main settlements in the HMA.</p> <p>Economic prospects would, however, appear to suggest higher rates of growth. Public consultation also recognised that an alternative with higher rates of growth than continuing the current strategy could be linked to transport investment (a rail station, better inter urban bus services). Neither land availability nor affordable housing need, however, support higher growth strongly.</p> <p>Rolling forward the current strategy also involves a pro-rata increase on past requirements. In this context it would be appropriate to test a strategy that included a lower rate of growth.</p>	Lower
Devizes	<p>The town is amongst the more environmentally constrained in the HMA and the pool of potential land opportunities appears to be relatively limited.</p> <p>Consultation highlighted a priority to deliver local employment. Air quality was also a concern. There was a view that larger sites might help deliver new roads to help to tackle it. There also appears to be a relatively significant need for affordable homes.</p>	Lower

	<p>Prospects for employment growth do not seem to match rolling forward the current strategy and trends seem to align with concern over local employment. Rolling forward the current strategy involves a pro-rata increase on past requirements. In this context it would be appropriate to test a strategy that included a lower rate of growth.</p>	
Melksham	<p>Environmentally, the area is less constrained than elsewhere. A strand of consultation responses considered the town in the same vein as Chippenham, as a candidate for a large scale and long term strategy and higher growth rates than current strategy. Overall trends do not bear this out strongly, with the significant exception of economic prospects pointing to growth higher than rolling forward the current strategy. However, compared to other settlements in the HMA there was less need for affordable housing.</p> <p>Given relatively less environmental constraints and stronger than average economic growth prospects, it would be appropriate to include an alternative strategy with growth higher than rolling forward the current one.</p>	Higher
Rest of HMA	<p>It is not possible to gauge environmental constraints over such a wide area. Rolling forward the current strategy would retain a focus on growth at main settlements. Some consultation responses suggested a less restrictive approach on two counts; to better</p>	Higher

support local communities and to widen the mix of sites helping to enable housing delivery.

Employment prospects, past trends and housing needs all suggest higher scales of development than rolling forward the current strategy. Even in the context of a pro-rata increase on past requirements by rolling forward the current strategy, it would be appropriate to test an alternative with higher rates of growth at rural settlements..

Table 11 Summary of conclusions

Alternative Development Strategies

109. All alternative strategies in the HMA will tend toward higher rates of housing development than those planned in the Wiltshire Core Strategy, as the evidence shows housing needs in the HMA increasing significantly. The forecast scale of need for employment land is less than the overall amount already available in the land supply. Consequently, additional requirements are set only where necessary to test where the evidence has identified specific needs.
110. Some uncertainty is attached to Chippenham, over the extent of market demand and what might be the appropriate scale of development to plan for. Both Functional Economic Market Assessment and Employment Land Review report clear market signals of increased demand for land and premises from business. Only recently, however, is land now coming forward for development. This suggests that it would be appropriate to test scales of growth with a wide range. It might also suggest a need for public intervention or co-ordination. This could help to provide greater certainty to investment in the town when it has had such a suppressed track record over recent years from a lack of land opportunities.
111. Using these reasons and assumptions, a set of alternatives are being considered. The following alternatives allow testing of a range of choices about the future of the area.

Roll forward the Wiltshire Core Strategy Distribution of homes and jobs (CH-A)
Method
Housing and employment land requirements are increased and distributed pro-rata to roll forward the current strategy. New employment allocations proposed only at Calne, Corsham and Melksham.
Justification
The current strategy distribution has not been challenged as unreasonable, although there may be issues to resolve to ensure its delivery. All settlements and the rural area would see a marked increase in housing requirements to match higher assessed needs. Without an emphasis upon one or more settlements this would be likely to increase the delivery of homes by a wider choice of locations within the market area. The increase in housing at settlements throughout the market areas would need to be supported by equivalent levels of job growth to counteract levels of net out commuting. The strategy maintains current business and market expectations of each settlement established in the WCS and previous Local Plans. The distribution of development in the WCS and its spatial strategy can be better fulfilled now that land has been allocated for housing and employment growth at Chippenham. This would allay concern that development pressures have been diverted to other smaller nearby settlements that are less suited to growth. Continuing the roles and relationships of settlements within the area may ensure the best use of existing infrastructure, may reduce overall demand for additional infrastructure. The scale of development envisaged for the rest of the HMA would take the form of a number of sites determined in large part through the preparation of Neighbourhood

Plans. The scale of development implies similar rates of house building at rural communities to the past decade.

Risks

The approach duplicates the current WCS distribution without reviewing its effectiveness. The current strategy may not be capable of delivering enough new homes to meet the projected increase in housing needs. Employment land provision would decrease by 8% overall, continue to be concentrated at key settlements ignoring the recommendations in the ELR to increase provision in the rest of the HMA.

A pro-rata increase in growth may make better use of existing infrastructure (see above) but it might also create demand for new infrastructure to support it that is potentially widespread and difficult to supply from public sector resources.

A pro-rata increase in growth might risk greater harmful environmental impact than if it could be more effectively managed by a focus on fewer locations for development in less environmentally sensitive areas.

	Housing		Employment
	Requirement	Residual	Additional requirement
Settlement Area	Dwellings		Hectares
Calne	2050	860	5
Chippenham	6441	1830	-
Corsham	1740	1265	2
Devizes	2870	2025	-
Malmesbury	1260	715	-
Melksham	3199	1850	2
Rest of HMA	2840	1470	-
Total	20400	10010	9

Chippenham Expanded Community (CH-B)

Method

More constrained settlements (Corsham, Calne, Devizes and Malmesbury) and Melksham continue at Core Strategy rates of housing growth. Rest of the HMA at a scale equivalent to rolling forward the strategy. Chippenham receives the balance (from about 6,400 homes in CH-A to about 9,800 homes).

New employment allocations proposed only at Chippenham and Calne

Justification

Functional Economic Market Area Assessment points to strong employment growth along the A350 corridor to the M4, particularly at its northern end around Chippenham. The Employment Land Review anticipates a significant increase in business

investment at Chippenham reflecting on market signals and engagement with stakeholders. A focus on Chippenham for further housing development addresses suppressed demand for homes in recent years because of low house building rates. The area is relatively unconstrained and a longer-term growth plan may enable a comprehensive consideration of the infrastructure needed to support significant growth.

For employment, the strategy therefore responds to the conclusions of the Employment Land Review that new employment land should be considered at Chippenham and consultation concerns about the lack of employment growth in Calne.

Public intervention could help to raise rates of development such as by forward funding of strategic infrastructure. Bespoke Government finance may support work. It may involve compulsory purchase or create a 'delivery vehicle'. Initiatives might involve partnership with volume housebuilders as well as other commercial developers. The need for such interventions was introduced into discussion as a part of preparing the Chippenham Site Allocations Plan.

A larger scale of development requires a long term vision and strategy that would follow the principles of Garden Cities. A critical decision involves the need to link the A4 to A350 and supporting the future of the town centre.

The strategy diverts the amount of development needed to meet increased need away from settlements that are more environmentally constrained or sensitive. This could also relieve development trends that might increase net out-commuting and the dormitory roles of some settlements. Rates of development at other settlements in the market area nonetheless continue those expected over the current 2006- 2026 WCS plan period.

Risks

Housing delivery has been slow at Chippenham because of a lack of land opportunities to provide mixed use allocations that can secure land for economic investment as well as for new homes. Although progress will be reflected in housing and supply data in coming years there remains a risk that unforeseen constraints could slow down progress. While the ELR support additional growth at Chippenham, employment land delivery has been poor and Chippenham Site Allocations Plan permissions have only recently been granted.

Melksham is considered to be relatively unconstrained at this stage of the plan making process. More detailed assessment of the constraints themselves may limit the scope for growth envisaged by this strategy.

The scope for potential growth at Chippenham is hard to judge given the lack of a recent track record. Implied rates of house building have been approached in the past but not for any sustained period. This alternative envisages a step change that may be unrealistic to achieve and which may undermine the Council's responsibility to ensure a continuity of supply of deliverable land for housing.

This strategy would result in no additional employment at the rest of the HMA contrary to ELR recommendations.

Settlement Area	Housing	Residual	Employment
	Requirement Dwellings		Additional requirement Hectares
Calne	1440	250	2
Chippenham	9765	5155	7
Corsham	1220	745	-
Devizes	2010	1165	-
Malmesbury	885	340	-
Melksham	2240	890	-
Rest of HMA	2840	1470	-
Total	20400	10010	9

Melksham Focus (CH-C)

Method

Housing requirements based on economic forecast for Melksham and follow a recent track record of sustained economic growth (for housing this means from about 3,200 homes in CH-A to about 4,000 homes). Higher rates are also proposed in the rest of the HMA. The strategy diverts the scale of new housing away from the main settlements that are more environmentally constrained or sensitive (Calne, Corsham, Devizes and Malmesbury).

The rate of development at Chippenham represents a mid-point between rolling forward the current strategy uncapped, and a higher growth option (CH-B)

New employment land proposed only at Melksham and Corsham. This responds to the conclusions of the Employment Land Review that there is a case for new allocations in Melksham and Corsham.

Justification

Housing requirements based on economic forecast for Melksham and follow a recent track record of sustained economic growth.

Employment growth has been robust in the past exceeding strategy requirements, justifying testing a provision shift to Melksham. The Employment Land Review identified the ICT business cluster at Corsham as an area having further potential to grow.

As with the Chippenham Expanded Community Alternative, the strategy diverts the amount of development needed to meet increased need away from settlements that are more environmentally constrained or sensitive. However, a focus on Melksham does not reduce scales of development elsewhere to the same degree as the former. Rates of development at other settlements in the market area increase the rates implied in the current 2006- 2026 WCS plan period. It would be unreasonable to

anticipate an increase in rates of growth at Melksham equivalent to Chippenham. Consequently, the strategy may not relieve development trends that have seen a growth in net out-commuting and a more pronounced dormitory role for some settlements to the same degree.

Risks

Although there is a recent track record of growth in both housing and employment sectors, it may not be possible to sustain. The extent and depth of local services and infrastructure may not be sufficiently in-depth or have of limited capacity or attractiveness. This may well be tested by the development of new business and housing growth at Chippenham.

Melksham is considered to be relatively unconstrained at this stage of the plan making process. More detailed assessment of the constraints themselves may limit the scope for growth envisaged by this strategy. The alternative does not prevent rates of growth required at other settlements needing to be increased and this may threaten unacceptable environmental harm.

This strategy would result in no additional employment at the rest of the HMA contrary to ELR recommendations.

Implied rates of house building have been approached in the past but only exceptionally. This alternative envisages a change that may be unrealistic to achieve and which may undermine the Council's responsibility to ensure a continuity of supply of deliverable land for housing.

	Housing		Employment
		Residual	Additional requirement
Settlement Area	Dwellings		Hectares
Calne	1610	420	-
Chippenham	6930	2320	-
Corsham	1365	890	4
Devizes	2250	1405	-
Malmesbury	990	445	-
Melksham	3950	2600	5
Rest of HMA	3300	1930	-
Total	20395	10010	9

Annex 1 Summary of assessment method

The assessments look at potential impacts upon each place and how development trends compare to those anticipated by the new evidence. Impacts involve looking at what additional land requirements there would be for growth over and above what can already be accounted for with planning consent or plan allocations. The results of public consultation also help to highlight where alternatives may need to be considered because this has raised new issues and opportunities. As mentioned above, the result of each assessment method might indicate a higher or lower rate of growth in the future for a particular settlement. The assessment takes into consideration economic, social and environmental factors as well as delivery and infrastructure constraints.

Potential impacts <i>Place based assessment</i>	Development trends <i>Assessment of different scales of growth</i>
<p>Biodiversity: what is the risk of harming local biodiversity?</p> <p>(Source: advice from specialists based on published information)</p>	<p>Trends: How does forecast housing need compare with what has actually happened?</p> <p>(Source: implied future rates of development compared to actual past rates)</p>
<p>Landscape: what are the risks of harm to the character and attractiveness of the local landscape?</p> <p>(Source: advice from specialists based on published information)</p>	<p>Land availability: Is there land to continue the current strategy?</p> <p>(Source: future scale of housing and employment need compared to the amount already committed)</p>
<p>Heritage: what is the risk of harming heritage assets?</p> <p>(Source: advice from specialists based on published information)</p>	<p>Economy: housing and employment</p> <p>Do economic forecasts predict a need for more employment land or new homes than the current strategy?</p> <p>(Source: rolling forward the current distribution of development compared to forecast pattern of job growth)</p>
<p>Flooding: what is the likelihood of unacceptable risks of flooding?</p> <p>(Source: advice from specialists based on published information)</p>	<p>Social: population and affordable housing</p> <p>Are homes provided where people live and where there are the most needs for affordable homes?</p> <p>(Source: rolling forward the current strategy compared to the distribution of the population and registered needs for affordable homes)</p>
<p>Infrastructure: can the current strategy be supported by secondary school capacity and the local transport network?</p> <p>(Source: advice from specialists based on published information. An estimate of the number of years until secondary capacity is reached.)</p>	

<p>Consultation responses: what are the new issues and opportunities?</p>	
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(Source: summary reports of public consultation)

Annex Two: Transport Assessment Definitions

Rail Station

Defined as located within the urban extent of the settlement and has a usable passenger function. Affording residents direct access to the passenger rail network, for Wiltshire and national journeys.

Key Bus Route Network

As defined in Core Policy 2, Fig 4.1A. A settlement should have at least 1 Key Bus route within the urban extent of the settlement. The KBRN gives residents a regular public transport option to key destinations both locally and within the South West. Where the KBRN is not located directly within the settlement some officer judgement has been used to enable access to the network by reasonable walking distance (est. 400m).

Freight Network

As defined in Wiltshire Freight Strategy 2011-2026, the advisory freight network is included as a factor of the level of servicing a new development (both in construction and occupation) that may be required and ensuring that such developments have access to preferred routes for HGV traffic. Settlement should have at least 1 advisory freight route within the urban extent of the settlement. Some officer judgement has been used to enable access to this network by reasonable estimated direct road distance (500m), where the route does not fall directly within the settlement boundary.

Primary Route Network

The primary route network (PRN) designates roads between primary destinations with the aim of providing easily identifiable routes to access the whole of the country. Primary routes are marked green on most road maps, as opposed to the more common red of an ordinary A road. The inclusion of PRN recognises the settlements linkage to the wider road network and its potential for further capacity. Settlement should have at least 1 PRN within the urban extent of the settlement. Some officer judgement has been used to enable access to this network by reasonable estimated direct road distance (500m), where the route does not fall directly within the settlement boundary.

Town Cycle Network

As defined in Wiltshire Council Cycle Strategy 2014, Appendix 1 To enable residents within a settlement access to easy internal and inter-urban journeys servicing new and existing developments.

