

CHIPP95

Chippenham Consultation Response Form

Ref:

(For official use only)

A series of 'Planning for' documents break down the work undertaken so far for each Principal Settlement and Market Town. Within these documents, information is presented, and questions asked to help shape proposals for each place.

To view these documents please visit the Council's Local Plan Review Consultation page on its website at: <https://www.wiltshire.gov.uk/planning-policy-local-plan-review-consultation>

Please return to Wiltshire Council by Tuesday 9th March 2021.

By post to: Spatial Planning, Economic Development and Planning, Wiltshire Council, County Hall, Bythesea Road, Trowbridge, Wiltshire, BA14 8JN.

By e-mail to: spatialplanningpolicy@wiltshire.gov.uk

This form has two sections:

Section One – Personal details

Section Two – Your response to the questions. Please use a separate sheet for each representation.

Section One – Personal details

*if an agent is appointed, please fill in your Title, Name and Organisation but the full contact details of the agent must be completed.

| | 1. Personal details | 2. Agent's details (if applicable)* |
|----------------------------------|------------------------|-------------------------------------|
| Title | █ | |
| First name | ██████ | |
| Last name | ██████████ | |
| Job title (where relevant) | Working for the Planet | |
| Organisation (where relevant) | | |
| Address Line 1 | ██████████ | |
| Address Line 2 | ██████████ | |
| Address Line 3 | ██████ | |
| Address Line 4 | | |
| Postcode | ██████████ | |

| | | |
|------------------|------------|--|
| Telephone Number | ██████████ | |
| Email Address | ██████████ | |

Section Two – Questions

CP1. What do you think to the scale of growth? Should there be a brownfield target?
Should this figure be higher or lower?

Answer:

The scientific measurement evidence clearly shows that we have made Zero progress to date in reducing the exponential rate of increase of every Global Climate Change measure.

*Given the facts, the evidence and the science to back it all up, the proposed scale of growth is **INSANE**.*

*The most immediate practical 1st step is to stop **all** urban expansion planning because it creates estates that emit vast amounts of Carbon in their preparation, construction and operation, until we have control of all Global Climate Indicators.*

The only places to consider building are places which have existing buildings that cannot be made to run carbon-zero operationally and where the sealed soil underneath them is dead already or not present – Brownfield sites.

In considering any brownfield site, a full carbon Life Cycle Analysis (LCA) assessment to 2050 should be made to compare best-effort refurbishment to demolition and rebuild.

*Rebuilding should always create a net-carbon-positive new building with **all** emissions amortised out to 2050 – that’s counting everything from the demolition fuel to the fitted carpets, as well as finished operational emissions (including the emissions of the living residents themselves).*

There should only be a Brownfield target.

CP2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?

Answer:

The scientific measurement evidence clearly shows that we have made Zero progress to date in reducing the exponential rate of increase of every Climate Change measure.

Given the facts, the evidence and the science to back it all up, the Top Priority is to urgently address both existential threats to the very existence of Chippenham and its community: the Climate Crisis and the Ecological crisis.

Chippenham contains a set of hard working people, a full government, transport and business infrastructure, all operating within the law to form a complex, productive, wealthy society. The purpose, aims and objectives of this fully-functioning community must be to put all of our resources - intelligence, structure, governance and industry to work - in an all-out effort which forges a path towards a future for this existing society. This is the right priority.

The Existential threat to humanity from Climate Change means that if we don't fix it, ALL human life and most of all life on this planet will be terminated. The climate problems alone are already so immense that they may be unfixable, but we have to try.

By focussing on the destruction of our farmland for housing, by planning to carve roadways through the living soil, by intending to create more sinks for fossil fuelled power, by wanting more space for energy intensive vehicles, by encouraging a bigger set of consumers, by ignoring the need to increase biodiversity, by not valuing our local food generation resources or the work that plants and trees do to clean and generate the very air we all breath, we are not only wasting the resources of this community, we are putting them to use with the aim of destroying its own life support systems.

The key priorities right now are for Chippenham:

- Locally harvest more renewable energy than our community uses whilst increasing biodiversity
- Locally generate more food that our community consumes whilst increasing biodiversity
- Locally sequester more CO₂ than we generate as a community whilst increasing biodiversity

However, in reality, there are tens of thousands of things to be done and at a County and Town Council level, this Friends of The Earth 50-point action plan is as good a place as anywhere to start in taking action commensurate with the scale of the problems we face.

But the Leadership needs to be fully behind these A-Political objectives.

CP3. What land do you think is the most appropriate upon which to build?

What type and form of development should be brought forward at the town?

Answer:

The scientific measurement evidence clearly shows that we have made Zero progress to date in reducing the exponential rate of increase of every Climate Change measure.

The only land on which it is appropriate to build is Brownfield land, but with constraints, as discussed above.

However, there are few technologies that have the energy potential to achieve the objective of harvesting the energy that Humanity demands to maintain our comfort and complexity and to simultaneously draw enough CO₂ out of the atmosphere and the oceans to remove the heat insulation which human activity has installed in the atmosphere.

We will require millions of big-wind turbines (globally) but these are effectively 'buildings' which bring all of the emissions associated with construction. We have no choice but to construct them. However, Life Cycle Analysis reveals that the renewable energy harvested by them quickly pays for the carbon emitted by construction and structure manufacture. By selecting carbon-heavy materials we have an opportunity to sequester carbon in the structure manufacture process.

In this case, the land most appropriate to build on can be calculated using a cost-benefit analysis which considers annual energy harvested against carbon consumed and ecological damage done. An ideal place would be an existing town centre car-park, or a brownfield site such as the Bridge Centre gyratory.

The problems to solve are SO immense that they require a massive amplification of ambition and a total change of mindset from the public, business and government alike.

We will require hundreds of square kilometres of solar farm. In this case, the most appropriate land on which to build is that which already sites a house, an industrial unit or a business building. It's obvious – but we need to get on and do it. After that, if the land underneath a countryside solar farm is enhanced for biodiversity, used for crops and sited on driven piles, it is suitable – as part of the compromise that humanity needs to make.

The key point is that in building anything we need to de-prioritise the financial cost-benefit, de-prioritise the human comfort cost-benefit and make net-carbon-positive construction and net-biodiversity-gain construction mandatory and top priority.

CP4. What are the most important aspects to consider if these sites are going to be built on?

Answer:

The first important aspect to consider is that we are going to shorten the time available to complex society to fix the Climate Crisis, if we accept that Urban Expansion and Economic Growth really are this community's top priorities.

The second important aspect to consider is that we are going to shorten the time before the first critical ecological life-support system is terminated, if we accept that Urban Expansion and Economic Growth really are this community's top priorities.

The business men and women embedded within Government, Local Government, Town and Parish Councils will not be remembered in future history for the devastation that their ignorance wrought because history is a luxury only afforded to a complex society. There is no history following an existential event, there is no more complex society.

It is interesting to note that even the super-rich developers, financiers and construction moguls who stand to gain £ billions over the next decades from building out against this Chippenham Urban Expansion plan are not exempt from climate change or biodiversity collapse. It doesn't matter how much wealth these people accrue, there is no escape from a super-hot, climate-hostile world where nothing grows.

As the stockpile of food, power and control dwindles, everybody can look up to these individuals and know they did absolutely nothing to help avert a total global crisis. And in the final generation, who would want to live in a society populated only by that type of person?

For the identified preferred development sites at principal settlements, concept plans have been developed. Concept plans for each area show a way the land identified can be developed. They show the undeveloped land, areas suggested for development and possible locations for uses within them.

Please state which concept plan your answer is in relation to.

If your comments relate to both sites, please make it clear in each answer to which site your comments relate

My answer is written in response to CP4 relates to both Concept plans and to any modified future Chippenham Urban Expansion concept plan(s) the developers may come up with.

CP5. How can these concept plans be improved?

Answer:

The driving force behind the national housebuilding plan is the UK Government. Their objective is to build 250,000 new houses annually, to accommodate the 250,000 workers which the UK Government imports annually, in order to drive GDP growth up when productivity from the UK workforce is flat. The top level of the executive is driven by personal wealth, personal advancement, political ideology, economic ideology or a mixture of any or all of these things. It is next to impossible to get this type of personality to listen or to learn about the Climate Crisis or the Ecological Crisis.

- *Future incarnations of this type of planning can be averted by voting for a climate-aware party at the next general election*
- *Mass housebuilding over the countryside may be averted by sustained campaigning, direct non-violent action and legal opposition, particularly around the UK contributions to the Paris Accord*

At the Local Government level, pretty much the same personality problems apply to the members of executive, but to a lesser extent. I firmly believe that if they allowed themselves to be educated on the urgency of the ecological crisis, the changed climate, the causes, the unavoidable effects and the range of mitigations and repairs, this type of concept Urban Expansion planning could be halted and replaced with concept Countryside Enhancement planning.

- *The politicians within Wiltshire Council need urgent, professional and sustained education about all aspects of the Climate & Ecological Crises*
- *All executive, councillors and officers who engage in or who have engaged in paid business related to land banking, development, construction or waste should step down*
- *No Wiltshire Council business should be conducted with third party contractors behind the closed doors that currently exclude public scrutiny and verification of deals and contracts*
- *Urban Expansion across the countryside may be averted by sustained campaigning, direct non-violent action and legal opposition particularly around the UK contributions to the Paris Accord.*

At the Town and Parish level, the same personality problems apply to the power players but to a much lesser extent. As can be seen from the set of unanimous council decisions to reject the Wiltshire Council executive's Local Plans, it has been possible to educate a significant proportion of councillors on the urgency of the ecological crisis, the changed climate, their causes, unavoidable effects and the range of mitigations and repairs, that this type of concept Urban Expansion planning can be democratically opposed and they could recommend sensible concept Countryside Enhancement planning instead.

- *Any climate and ecologically-aware residents over 18 should consider standing for town council election to remove politics from the local agenda and fight for a future for the people of the town and surrounding countryside, a future that totally rejects this type of concept plan.*
- *Any climate and ecologically-aware residents over 18 should consider fully engaging in generating a local plan and calling out the officer-moderators and business-interests that drive local plans towards countryside destruction and business-as-usual activity in the interests of profit.*

CP6. Do you agree with the range of uses proposed, what other uses should be considered?

Answer:

No.

[The scientific measurement evidence](#) clearly shows that we have made Zero progress to date in reducing the exponential rate of increase of every Climate Change measure.

Given the facts, the evidence and the science to back it all up, we know that we need to partner with the existing living environment and help it to repair, regenerate and thrive. Time is short. This Local Plan totally misses the required objective and needs to be adjusted to include

- A full plan to foster and encourage each hedgerow in the set of fields targeted for development
- A full plan to encourage company for each lone tree in the set of fields targeted for development
- A full plan to encourage spinney, copse and woodland expansion in the set of fields targeted for development

We need to extrapolate from [the scientific measurement evidence](#) and observe that the actions taken to date by our leaders – and ourselves for that matter – are nowhere near doing what is required to avert a collapse of complex society. The Local Plan should outline how to make the community as prepared as possible for the coming effects of further climate and ecological breakdown and needs to be adjusted to include

- A full plan on how to accommodate and feed our first allocation of 10,000 climate migrants
- A full plan on how the existing Chippenham town moves to energy self-sufficiency using locally harvested energy
- A full plan on how the existing Chippenham town moves to carbon net-zero using local harvested energy and local CO₂ sequestration
- A full plan on the existing Chippenham town moves to food self-sufficiency using local land, existing industrial units and sustainable farming

CP7. Do you agree with the location of the proposed uses? What should be located where and why?

Answer:

No.

The Chippenham Urban Expansion plans should be replaced with Chippenham Countryside Enhancement planning. This would render the proposed set of uses and their locations irrelevant.

CP8. Do you agree with the location and amount of employment provided on sites 1 and 2?

Answer:

No.

The land use on sites 1. and 2. should remain as is and every aspect of that piece of the existing countryside should be examined and a plan generated for how to repair, enhance and fully utilise both the above-ground and below-ground eco-systems in harmony with food farming and energy farming.

Examination, planning, maintenance and measurement of the existing countryside are all opportunities for real people to be employed in a different future vision. When the people that make up the UK workforce transition from economic sectors which destroy climate and ecosystems – such as housing estate construction – they become contributors to a Green Economy and by this sector de-growth/re-growth method we are on our way to sustainable Green Economic Growth.

When anti-future sectors are de-grown, they will release existing Chippenham industrial and office space for pro-future sectors to germinate and grow. Therefore, in a well-managed transition the community can avoid employment construction whilst connecting to the source of their wellbeing and encouraging local employment.

CP9. Do you agree with the proposed locations for self build and custom build housing?

Would you prefer alternative locations?

If so, please explain.

Answer:

No.

The Chippenham Urban Expansion plans should be replaced with Chippenham Countryside Enhancement planning. This would set all proposed housing numbers to zero including those allocated to self build and custom build housing.

CP 10. Do you agree with the proposed sites for renewable energy?

Is there a particular type of renewable energy that should be provided?

Answer:

Before answering, it is worthwhile pausing to consider that the most effective way to avoid burning fossil fuel energy is to not burn it at all. [This link](#) highlights how much Renewable Energy we could avoid needing if only we controlled our thoughtless consumerism through both our business and our personal lifestyles.

I do not agree with the proposed sites for renewable energy shown in these Urban Expansion Concept plans. Such as they are, they are ok. But they are almost infinitesimally small, compared to what is actually required. We need to harvest renewable energy sufficient to cover all of Chippenham's heating, cooling, electricity, industry, travel, farming, breathing, R&D, recycling, sequestration and food requirements ... to name but an important subset of our energy uses.

The technology does exist to make a good start immediately. We live in a [FIAT economy](#) and as we have seen from the £400Billion Covid costs, if global banks work in harmony, governments can print as much money as required to save humanity, with no market consequence. If that feels too uncomfortable, there's more than enough money sitting, ready to be used in the [Offshore finance system](#). The thing to remember is that when civilised complex society breaks down due to climate change, money has no value at all.

The Local Plan should propose a complete Site-Assessment for each non-residential and every residential property in Chippenham by its owner, using existing EU-backed [solar power estimation tools](#). These should be submitted and automatically collated and prioritised for yield. The real-estate that is the existing Chippenham should then be systematically retro-fitted with Solar Power before 2030.

The Local Plan should already contain a full assessment of Chippenham's total energy and carbon sequestration needs out to 2030. It should already contain an associated plan which shows how these energy needs will be fully met from locally sited generation sources. Implementation will initially require Solar Farms to be situated^[temporarily] on some of this agricultural land to achieve an immediate start. Solar Farming must be an integral part of Chippenham Countryside Enhancement local plan.

*The highest power-to energy footprint energy harvesting method is wind power. [GlobalWindAtlas](#) suggests that just **seven Halide-X 12MW** turbines at 42% CF could provide Chippenham's annual²⁰¹⁸ 310,000MWh of electrical and heating power. [OsMaps](#) show that there are 18 HV Pylons in the countryside targeted by this climate-unconscious Urban Expansion, spaced over 300m apart. Per the recommended wind farm [turbine spacing](#), the Chippenham Local Plan could have used this opportunity to address the local generation of renewable energy for the Chippenham community. Instead, the architects of this plan focus on the generation of financial profit.*

Both Solar Farming and Wind Farming extract energy from above the earth's surface. If that energy is not used for chemical storage, it is all dissipated as heat back above the earth's surface. Nuclear power and Geothermal Power move previously stored energy into the earth's atmosphere. The quantities of energy required to service Human Comfort and draw down the required CO₂ are not significant compared to the global heating caused by recent [IPCC²⁰¹¹-reported levels \(page 697\)](#) of [Solar Radiative imbalance](#).

Geothermal represents an extremely powerful store of harvestable energy and could provide all of the energy that humanity requires to solve all of the [UN Sustainable Development Goals](#), if only our Leaders understood enough to actually Act. Scalable [industrial technology](#) already exists to convert Geothermal energy from simple bore holes into electricity, the smallest implementation can generate a consistent 115kW of baseload power in a 2x2x2m footprint. The only other thing required is a constant flow of cool water – which is readily available in the existing Chippenham conurbation – it's called the River Avon.

*Our myopic Local Government leaders need to significantly raise the level of ambition for harvesting renewable energy across all of Wiltshire and **GET ON AND DO IT** on a scale commensurate with the problem that already exists - by creating enabling Policies - rather than whining about it not being possible and focussing instead on making money.*

CP11. Site 1 - Do you agree with the proposal for some housing to be located north of the North Rivers cycle path?

Answer:

No.

The Chippenham Urban Expansion plans should be replaced with Chippenham Countryside Enhancement planning. This would set all proposed housing numbers to zero including those located North of the North Rivers cycle path.

CP12. Site 1 - Are there any uses that would be most suitable for Hardens Farm and New Leazes Farm?

Answer:

Yes, farming.

More precisely, Sustainable Farming.

CP13. Are there important factors you think we've missed that need to be considered in planning for Chippenham?

Answer:

Indeed I do.

This Local Plan is a missed opportunity in the last decade that we have available to make a difference. Climate and ecological tipping points will kick in soon and then it will be too late to fix the planet's problems.

There are literally thousands of things to be done that do not include building any more roads or houses but which do focus of making much better use of what we already have, including people, places and resources.

Here is a short list; each plan would require significant work and significant change but would contribute to the concept of Green Economic growth for the good of the community, our wellbeing, our co-habiting lifeforms and our natural environment:

- *A full plan to educate the people of Chippenham about the urgency of the Climate & Ecological emergency*
- *A full plan for ubiquitous and effective cycle & pedestrian paths*
- *A full plan for cycle parking in the town centre with video security*
- *A full plan for repairing roadside potholes and smoothing side of road surfaces in all existing urban roadways to encourage cycling*
- *A full plan to expand the Chippenham market with locally grown food both standard and artisan*
- *A full plan to plant climbers or ivys to grow up all lamp posts and walls in the existing urban environment*
- *A full plan to re-wild, shrub or tree-plant all green spaces in Chippenham*
- *A full plan for how to use public buildings from offices to car parks in the aftermath of extreme weather events*
- *A full plan on how to make Chippenham fully serviced by busses that are >50% full at all times and cover all of Chippenham*
- *A full plan to retrofit every private, council and business property with insulation and (where possible) PV, ASHP or GSHP*
- *A full plan for Chippenham to recycle all of its own plastic back into plastic feedstock using locally harvested energy*
- *A full plan for Chippenham to collect and recycle its food waste into green fertiliser and methane and convert that into synthetic fuel, using locally harvested energy*
- *A full plan to engage the community of Chippenham in Citizens Assemblies, where to assemble, how to communicate and efficiently vote.*

We need a reset of our entire governance, community, business, education and money systems. For as long as this is not addressed, we will continue to sleepwalk into a dark future.

If you have any further comments you wish to make, please detail them below.

You might ask why I am so fixated on the Climate and Ecological Crises to the exclusion of what most people think of as improvements to their lifestyles and their wealth.

The answer is very simple: I can read [this graph](#).

*I understand what [this graph](#) actually means. I see where we've gone wrong, who needs to Act to get control of it, why it is a near-impossible task (given our human nature) and when trying to fix it will no longer matter. But I still consider it worthwhile spending 40+ hours **trying** to make others see through this "consultation", because I care about life on earth.*

Future notification

I wish to be notified of any future updates relating to the Local Plan Review:

YES:

NO:

Clicking yes will add you to the planning policy contact database. This will mean you are kept informed of any future planning policy updates and consultations.

Further information on how the Spatial Planning Department treats your personally identifiable information can be found by reading the privacy notice available via the link below:

<https://www.wiltshire.gov.uk/planning-privacy-notice>

Here you will also find information about how and why your data may be processed and your rights under the Data Subject Information Notice section further down the page.

Signature:

Date:

Thank you for completing this form.

Data Protection

Wiltshire Council has a duty to protect personal information and will process personal data in accordance with Data Protection legislation. The personal data you provide on this form will only be used for the purpose of the Wiltshire Development Framework. It may also be used for the prevention or detection of fraud or crime and in an anonymised form for statistical purposes. The data will be stored on computer and/or manual files. You have a right to a copy of your information held by any organisation, with some exemptions. To gain access to your personal data held by Wiltshire Council or if you have any Data Protection concerns please contact Wiltshire Council's Data Protection Officer on 01225 713000 (switchboard) or e-mail to dataprotection@wiltshire.gov.uk ."

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| | 1. Personal details | 2. Agent's details (if applicable)* |
|----------------------------------|---------------------|-------------------------------------|
| Title | | ████ |
| First name | | ██████ |
| Last name | | ██████████ |
| Job title (where relevant) | | Senior Director |
| Organisation (where relevant) | Robert Hitchins Ltd | Pegasus Group |
| Address Line 1 | | Pegasus House |
| Address Line 2 | | Querns Business Centre |
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| Address Line 4 | | Cirencester |
| Postcode | | GL7 1RT |

| | | |
|------------------|--|------------------------------------|
| Telephone Number | | ██████████ |
| Email Address | | ██████████ ████████████████████ |

Section Two – Questions

CP1. What do you think to the scale of growth? Should there be a brownfield target? Should this figure be higher or lower?

Answer:

Pegasus supports the increase in the level of growth identified in paragraph 9, The new strategy proposes a requirement of 9,225 homes for the plan period 2016-2036. The figure should be prefixed with “at least” in order to be consistent with Government guidance and to boost housing supply.

For reasons outlined in response to the Emerging Strategy it is considered that the plan period should be 2020 – 2040.

Chippenham is well place to support economic growth being located in the A350 Growth Zone, and the Swindon M4 Growth Zone i.e. two of the three Growth Zones identified by the Swindon and Wiltshire LEP, where there is a large agglomeration of economic activity and where there is the greatest capacity for supporting sustainable growth in the future. Chippenham is one of the largest towns in Wiltshire and has excellent transport links being close to the M4 and located on the Bristol to London railway route.

As Chippenham is located in both the Swindon -M4 Growth Zone and the A350 Growth Zone it is a pivotal location in the development of both the M4 and A350 Growth corridors. Its inclusion in the Swindon M4 Growth Zone offers the potential to extend growth into the area that has developed out of London through to Reading and Swindon, as well as potential to draw in investment from the west out of Bristol and Bath.

The Employment Land Review (May 2018) also supports further growth at Chippenham and Melksham. *“In the A350 FEMA, the potential supply (excluding sites that are un-allocated or at high risk of non-delivery) is just above the range of potential demand scenarios. The market is interested in Chippenham, and there is scope for more land to be allocated here, as well as at Melksham and Corsham.”*

Chippenham and Melksham are amongst the areas where there is forecast demand for new employment land, but insufficient supply. In Melksham the highest forecast demand scenario is more than double the currently available supply.

There is a strong case to support the future growth of the Chippenham HMA.

It is noted in the Chippenham HMA Alternative Development Strategies document at paragraph 31 states that it is not proposed to review current plan allocations as *“these are necessary to support a developable supply of land for housing development.”*

The PPG advises when determining whether a plan or policies within a plan should be updated that amongst the factors that can be considered are *“whether issues have arisen that may impact on the deliverability of key site allocations;”*

An outline planning application (15/12351/OUT) for the Rawlings Farm site for 650 dwellings, employment land, primary school and country park achieved a conditional 'resolution to permit' from Wiltshire Strategic Planning Committee on 16th September 2020 subject to the completion of a S.106 legal agreement within six months of the committee resolution. The committee resolution stated;

"Or in the event that the applicant declines to enter the agreement and/or it becomes clear that they will not do so then to refuse permission for the following reason:

The application proposal fails to provide and secure the necessary and required Services and infrastructure supporting the proposed residential development including Affordable Housing; Waste; Air Quality Management; Highways; Education and is therefore contrary to Policies CP3 CP43 & CP55 of the Wiltshire Core Strategy Adopted January 2015 and Paras 11, 12 & 54 of the National Planning Policy Framework July 2019."

Given delivery of the totality of the allocation is predicated on the construction of a new link road, including the provision of a new bridge over the mainline railway (permission for which is extant (18/02037/FUL)) it is most unlikely that the delivery of any new homes from this site to the east of Chippenham will be achieved within the plan period of the Core Strategy i.e., before 2026 or the emerging plan period. This in turn brings into question the prudence of relying on delivery from Site 1 during the emerging plan period, which relies not only on this infrastructure, but also a crossing of the Avon and extensive area of land within flood zones 2 and 3.

As referred to in our response to the Emerging Strategy, Pegasus is also concerned about the emphasis on brownfield sites and the introduction of a brownfield target for 10 years. What appears to be clear from the consultation is that the Council wish to identify as much brownfield land as possible within the urban areas, not only to make the best use of it but to "reduce the need to encroach into countryside".

The Council suggest a target of 240 homes to be built on brownfield land over the next 10 years – 2021-2031.

Whilst the principle of brownfield development is encouraged these sites are often fraught with difficulties in terms of delivery timescales. The promotion of an effective use of land set out in the 2019 NPPF is not a return to a brownfield first policy approach of the past. The Council's growth strategy should be a balanced rather than sequential approach. Housing delivery is optimised by the widest possible range of housing site sizes and market locations, which provides suitable land buying opportunities for small, medium and large housebuilding companies.

There needs to be a range and choice of sites in order to meet housing needs. The Council should avoid "town cramming", which would provide insufficient variety in house typologies to create balanced communities with the right types of new homes to meet the housing needs of different groups. There will be a limited capacity for higher densities and more taller buildings, which will only be appropriate in certain locations. A blanket approach to the intensification of housing densities everywhere would be inappropriate as a range of differing densities will be needed to ensure development is in keeping with the character of the surrounding area. The future deliverability of intensely developed residential schemes will also be dependent on the viability of PDL and market demand for high density urban living post Covid-19. The promotion of an effective use of land set out in the 2019 NPPF is not a return to a brownfield first policy approach of the past.

The widest mix of sites provides choice for consumers, allows places to grow in sustainable ways, creates opportunities to diversify the construction sector, responds to changing circumstances, treats the housing requirement as a minimum rather than a maximum and provides competition in the land market. A diversified portfolio of housing sites also offers the widest possible range of products to households to access different types of dwellings to meet their housing needs.

CP2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?

Answer:

The place shaping priorities refer in the main to new employment opportunities, the role of the town centre and supporting its role in the settlement hierarchy.

Place shaping priorities need to be bespoke to the settlement and relate to the development and use of land, which they do but there is no reference to meeting housing needs in the plan period.

CP3. What land do you think is the most appropriate upon which to build?

What type and form of development should be brought forward at the town?

Answer:

It is noted that sites have been assessed and subject to a Sustainability Appraisal, but land to the North of Barrow Farm (SHLAA ref 744) has not been selected as a preferred site irrespective of the fact that it scored relatively well in the SA and was taken forward following the Stage 2 Assessment on the basis that it did not appear to have any overriding significant impacts.

Land to the north of Barrow Farm has been promoted to the Council, at the time of the last consultation on the Alternative Development Strategies in August 2019 our representations were supported by a submission on the site which included a concept plan and delivery trajectory.

The concept plan was prepared showing how the site could be developed to provide for a mixed-use development (either as a whole or in part) which has regard to the settings of Listed Buildings, including the farmland setting of Barrow Farmhouse (to the north, west and east), retains and improves public access to Langley Common (non-designated heritage asset), and proposes a significant extension to Birds Marsh Wood and buffers both this extension and Dog Kennel Plantation. The concept plan demonstrated how the site could accommodate approximately 850 dwellings and a primary school and local/neighbourhood centre. Green Infrastructure to include: formal and informal leisure and recreation, extension to Birds Marsh Wood, biodiversity enhancements, improved public access and appropriate settings for Listed Buildings.

The land immediately adjoins the northern fringe of Chippenham, is very accessible to the town centre and the M4 and can be readily serviced, it is not reliant on major pieces of infrastructure. The site can be brought forward in the short-term and, unlike the sites to the east and south of Chippenham, without the need for major infrastructure and resultant time lag in lead in time.

The site could deliver between 75 and 100 dwellings per annum. A key advantage of this site is the flexibility to deliver individual phases (or part phases) in the short/medium term to respond to ongoing housing requirements; that is to say that its size can be tailored to the size of the requirement.

Phase 1 250
Phase 2 250
Phase 3a 250
Phase 3b 100
TOTAL 850

A planning application has recently been submitted on part of the site (which can be seen as a first phase) for up to 250 dwellings, a local centre, associated infrastructure, landscaping and access. A number of off-site improvements (which comprise pedestrian / cycle linkages to existing networks including: widening of the existing footway on the east side of the B4069 south of the existing roundabout and pedestrian / cycle linkages to the west of the B4069 and north of the North Chippenham Link Road) to the local pedestrian and cycle network are also proposed as part of the development, which have been informed by the Transport Assessment and public consultation. The off-site measures have been designed to provide walking / cycling enhancements along existing transport corridors and to provide linkages to existing recreational routes in the surrounding area. Vehicular access will be provided from the B4069 which provides a direct connection with the centre of Chippenham, yet the Council's assessment of the site in the Site Selection report concludes that the site has average accessibility to local facilities and rated "amber."

The site presents the opportunity to integrate the proposed development with the urban edge of Chippenham including development to the south; to enhance ecological habitats to provide a net gain in biodiversity and contribute to the local Green Infrastructure Network; to reduce greenhouse gas emissions through location of residential development near to existing services that reduce the need to travel, promotion of sustainable transport options and cycle / pedestrian linkages, and consideration of green infrastructure, ecological enhancements and SuDs to provide resilience to climate change.

The 'Flood Map for Planning' confirms that the site, in its entirety, falls within Flood Zone 1, which is at the lowest risk of flooding.

The Site Selection report, Land to North of Barrow Farm (SHELAA ref 744) is assessed, the RAG assessment assesses the site as "amber" for accessibility, flood risk, heritage, landscape and traffic; yet the Council's review of Site 744 states that "the site has no significantly harmful effects on any congested roads". The Stage 4 assessment recognises the site's "strength" with respect to accessibility (PSP4) being able to provide "well-connected footpaths and cycleways and connectivity for public transport". It is considered that the site should be assessed as "green."

The Environmental Statement to support the recently submitted planning application referred to above demonstrates that there are no overriding environmental constraints which would preclude the Proposed Development on the Application Site. The design of the Proposed Development has taken account of the likely significant environmental effects and where necessary, mitigation measures form an integral part of the Proposed Development to ensure that the environment is suitably protected.

Unlike SHELAA site 506b Land at East Chippenham (Hardens Farm and New Lease Farm), land north of Barrow Farm does not contain designated or non-designated heritage assets (Grade II Listed Hardens Farm, Tytherton Lucas Conservation Area are within site 506b).

Unlike the other settlements in the HMA, the potential sites at Chippenham have been assessed beyond Stage 2. Stage 3 is where the sites selected are assessed against 12 objectives that reflect social, economic and environmental aspects by which the effects of the development of each site can be identified. SHELAA site 744 becomes potential site 7 and is assessed against the objectives and scored. The results are that Sites 2, 3 and 7 scored the same and come 4th in the assessment. (Site 2 is one of the Preferred Sites in the identified to accommodate Chippenham's needs).

Stage 4 is the Selection of Sites where, "*The more sustainable site options resulting from Stage 3 are individually evaluated against the Place Shaping Priorities at each settlement, since it is important to select sites that support locally-specific and important outcomes.*" In this assessment Site 4 is assessed as weak against the Place Shaping Priorities the River Avon Corridor, New Infrastructure and Surrounding Villages, whilst its strengths are employment, town centre and accessibility.

New Infrastructure (PSP5) is shown as a weakness in that it “*wouldn’t provide further opportunities to provide a more resilient local network addressing traffic congestion within the town*”. This is the wrong approach for the reasons discussed below. The review also assumes that vehicular access would be from the Northern Distributor Road which is not correct as access is to be taken from the B4069. The site is well placed to benefit from the Northern Distributor Road which once complete will connect the A350 with the B4069. It is also well placed to benefit from a potential future eastern link road which will provide a connection between the A4 and A350.

For PSP5 it appears that unless a site is on land that can deliver either a “new eastern link road” or “new southern link road” then it has been flagged as a “weakness”. This is completely the wrong approach. Delivery of a site without the need for extensive new infrastructure (with uncertain delivery prospects) is a “strength” and not a “weakness”.

At the time of our submission in response to the consultation on the Alternative Development Strategies in August 2019, a Concept Plan was prepared which showed how the site could be developed to provide for a mixed use development (either as a whole or in part) which has regard to the settings of Listed Buildings, including the farmland setting of Barrow Farmhouse (to the north, west and east), retains and improves public access to Langley Common (non-designated heritage asset), and proposes a significant extension to Birds Marsh Wood and buffers both this extension and Dog Kennel Plantation.

The land is within the control of a highly experienced developer/promoter who has brought forward numerous strategic sites in Wiltshire including sites at Calne, Devizes, Westbury and Melksham.

The land immediately adjoins the northern fringe of Chippenham, is very accessible to the town centre and the M4 and can be readily serviced.

In summary land north of Chippenham offers the opportunity to provide for a flexible urban extension in a highly sustainable location on the edge of Chippenham which is deliverable at various scales from 250 up to around 850 dwellings. The site can be brought forward in the short-term without the need for new major infrastructure and resultant lag in lead time. Given the likelihood of substantial allocations being made at Chippenham, some of which will require extensive infrastructure, it is important the Local Plan takes a portfolio approach by allocating readily deliverable smaller/medium sized sites to ensure continuity/flexibility in delivery before larger sites can come on stream.

An objection is made to the Preferred Options for development i.e. Sites 1, 2 and 3, which is entirely reliant upon a strategy for growth to be accommodated to the east of Chippenham. Site 1 has been chosen to enable an eastern distributor road to be developed linking the A4 with the A350, which is reported to help address congestion in the town centre. It is noted that Sites 2 and 3 are also identified to support this objective/Place Shaping Priority and to support a southern distributor if required to link the A4 with the A350 at the Lackham roundabout. All three sites are adjacent to the River Avon and consequently can deliver against PSP3 (those that are not adjacent i.e. site 7 cannot satisfy this Place Shaping Priority).

It is considered that the strategy is too focussed upon the east of Chippenham, relies on uncertain delivery of extensive infrastructure and does not provide the range and choices of sites in order to ensure delivery. In short such a strategy risks failing the soundness test of being deliverable.

A strategic site allocated in the Chippenham Site Allocations Plan (2017) to meet housing need for the period up to 2026 has failed to deliver. An outline planning application (15/12351/OUT) for the Rawlings Farm site (to the west of Preferred Site 1) for 650 dwellings, employment land, primary school and country park achieved a conditional 'resolution to permit' from Wiltshire Strategic Planning Committee on 16th September 2020 subject to the completion of a S.106 legal agreement within six months of the committee resolution. Given delivery of the totality of the allocation is predicated on the construction of a new link

road, including the provision of a new bridge over the mainline railway (permission for which is extant (18/02037/FUL)) it is most unlikely that the delivery of any new homes from this site will be achieved within the plan period i.e., before 2026.

In order for the strategy for Chippenham to succeed in meeting housing needs it is considered that a range of sites is required including sites that do not rely on extensive and uncertain delivery of major infrastructure.

The update to the Lichfield report - "Start to Finish" Second Edition, February 2020 highlighted the risks of relying on larger sites, which must be all the greater here given the reliance on such extensive infrastructure.

There is already a 5 year housing land supply shortfall, land north of Barrow Farm provides a deliverable site in the short term which doesn't require extensive infrastructure and complements the strategy for Chippenham. The site is in a sustainable location for development. It is located in close proximity to the existing employment areas at north east Chippenham. Chippenham railway station is 1.3km from the site and the services and facilities of Chippenham Town Centre are located approximately 1.5km to the south. Educational facilities are provided at St. Paul's primary school 800m south west of the site, Hardenhuish Secondary School 1.5km to the south west of the site and at Wiltshire College approximately 1km due south of the site.

The site is available now and housing can be delivered within the plan period. Even allowing an average of 3 years (which was found to be the average time taken from an outline decision notice to first dwelling completions on site), in the NLP Report 'Start to Finish' (Feb 2020) with no major infrastructure required, and in this case assuming one outlet on site; the site can deliver a substantial number of dwellings within the next five years.

CP4. What are the most important aspects to consider if these sites are going to be built on?

Answer:

The most important aspect is to deliver sustainable development in a timely manner. Chippenham has failed to deliver sites in the past and it is important in the future that it doesn't continue to do so by pursuing a strategy that relies solely on the delivery of these sites.

For the identified preferred development sites at principal settlements, concept plans have been developed. Concept plans for each area show a way the land identified can be developed. They show the undeveloped land, areas suggested for development and possible locations for uses within them.

Please state which concept plan your answer is in relation to.

If your comments relate to both sites, please make it clear in each answer to which site your comments relate

CP5. How can these concept plans be improved?

Answer:

The concept plans should not pre-empt the planning of the sites through the preparation of the planning application. It is considered as proposed the concept plans are too prescriptive.

The Inspector in his preliminary conclusions and post hearings advice to South Oxfordshire District Council (28th August 2020) stated in respect of concept plans that: *“These are only valuable if they accurately reflect the realistic development plans of the site promoters as well as the Council and the County Council.The relevant policies need to make clear that they are for illustrative purposes only.”*

CP6. Do you agree with the range of uses proposed, what other uses should be considered?

Answer:

As Pegasus is not promoting the Preferred sites we have no comments on the range of uses.

CP7. Do you agree with the range of proposed uses? What should be located where and why?

Answer:

No comment.

CP8. Do you agree with the location and amount of employment provided on sites 1 and 2?

Answer:

No comment.

**CP9. Do you agree with the proposed locations for self build and custom build housing?
Would you prefer alternative locations?**

If so, please explain.

Answer:

An objection is made to the inclusion of self-build on Under the Self Build & Custom Housebuilding Act 2015, the Council has a duty to keep a Register of people seeking to acquire self & custom build plots and to grant enough suitable development permissions to meet identified demand.

The PPG sets out at paragraph 25 reference ID 57-025-201760728) the ways in which the Council should consider supporting self & custom build. These are :-

- developing policies in the City Plan for self & custom build ;
- using Council owned land if available and suitable for self & custom build and marketing such opportunities to entrants on the Register ;
- engaging with landowners who own housing sites and encouraging them to consider self & custom build and where the landowner is interested facilitating access to entrants on the Register ; and
- working with custom build developers to maximise opportunities for self & custom housebuilding.

Whilst self-build can make a contribution to the overall housing land supply, it should not be policy requirement for the inclusion of self-build or custom build housing on residential development sites which only changes housing delivery from one form of house building to another without any consequential additional contribution to boosting housing supply.

The Council should not seek to place the burden for delivery of self & custom build plots on to developers of strategic sites contrary to national guidance, which outlines that the Council should engage with landowners and encourage them to consider self & custom build. The Council's proposed policy approach should not move beyond encouragement by seeking provision of self & custom build plots as part of the housing mix on new housing development.

All policies should be underpinned by relevant and up to date evidence which should be adequate, proportionate and focussed tightly on supporting and justifying the policies concerned. The Council's Self & Custom Build Register alone is not a sound basis for setting a specific policy requirement. As set out in the NPPG the Council should provide a robust assessment of demand including an assessment and review of data held on the Council's Register (ID 2a-017-20192020), which should be supported by additional data from secondary sources to understand and consider future need for this type of housing (ID 57-0011-20160401). The Council should also analyse the preferences of entries as often only individual plots in rural locations are sought as opposed to plots on larger strategic housing sites. It is also possible for individuals and organisations to register with more than one Council so there is a possibility of some double counting. The Register may indicate a level of expression of interest in self & custom build but it cannot be reliably translated into actual demand should such plots be made available.

The Council's policy approach should be realistic to ensure that where self & custom build plots are provided, they are delivered and do not remain unsold. It is unlikely that the provision of self & custom build plots on new housing developments can be co-ordinated with the development of the wider site. At any one time, there are often multiple contractors and large machinery operating on-site from both a practical and health & safety perspective it is difficult to envisage the development of single plots by individuals operating alongside this construction activity. If demand for plots is not realised there is a risk of plots remaining permanently vacant effectively removing these undeveloped plots from the Council's overall HLS.

Where plots are not sold it is important that the Council's policy is clear as to when these revert to the original developer. It is important that plots should not be left empty to the detriment of neighbouring properties or the whole development. The timescale for reversion of these plots to the original housebuilder should be as short as possible from the commencement of development. The consequential delay in developing those plots presents further practical difficulties in terms of co-ordinating their development with construction activity on the wider site. There are even greater logistical problems created if the original housebuilder has completed the development and is forced to return to site to build out plots which have not been sold to self & custom builders.

As well as on-site practicalities any adverse impacts on viability should be tested. It is the Council's responsibility to robustly viability test the Local Plan in order that the cumulative financial impact of policy requirements are set so that most development is deliverable without further viability assessment negotiations and the deliverability of the Local Plan is not undermined. Self & custom build dwellings are exemption from Community Infrastructure Levy (CIL) contributions and affordable home ownership provision as set out in national policy. There may be a detrimental impact upon the level of affordable housing provision achieved on strategic housing developments. The Council may wish to adopt an aspirational approach in provision of plots to deliver self & custom build but this should not be pursued at the expense of delivering affordable housing.

CP 10. Do you agree with the proposed sites for renewable energy?

Is there a particular type of renewable energy that should be provided?

Answer:

No comment

CP11. Site 1 - Do you agree with the proposal for some housing to be located north of the North Rivers cyclepath?

Answer:

No comment

CP12. Site 1 - Are there any uses that would be most suitable for Hardens Farm and New Leazes Farm?

Answer:

No comment.

CP13. Are there important factors you think we've missed that need to be considered in planning for Chippenham?

Answer:

The preferred sites are focussed on development to the east of Chippenham - a new eastern road linking the A4 with the A350 through Rawlings Green and North Chippenham is identified as being required to help address congestion in and around the town centre. A southern distributor road linking the A4 with the A350 at the Lackham roundabout may be required. The potential options for housing sites for Chippenham are located on the outer edges of the towns. It is considered that the strategy for Chippenham fails to provide a range and choice of sites in deliverable locations, instead it relies on the delivery of extensive infrastructure (including a rail and river crossing) with all the inherent risks to deliverability of such a strategy.

If you have any further comments you wish to make, please detail them below.

Future notification

I wish to be notified of any future updates relating to the Local Plan Review:

YES: NO:

Clicking yes will add you to the planning policy contact database. This will mean you are kept informed of any future planning policy updates and consultations.

Further information on how the Spatial Planning Department treats your personally identifiable information can be found by reading the privacy notice available via the link below:

<https://www.wiltshire.gov.uk/planning-privacy-notice>

Here you will also find information about how and why your data may be processed and your rights under the Data Subject Information Notice section further down the page.

Signature: 

Date:

Thank you for completing this form.

Data Protection

Wiltshire Council has a duty to protect personal information and will process personal data in accordance with Data Protection legislation. The personal data you provide on this form will only be used for the purpose of the Wiltshire Development Framework. It may also be used for the prevention or detection of fraud or crime and in an anonymised form for statistical purposes. The data will be stored on computer and/or manual files. You have a right to a copy of your information held by any organisation, with some exemptions. To gain access to your personal data held by Wiltshire Council or if you have any Data Protection concerns please contact Wiltshire Council's Data Protection Officer on 01225 713000 (switchboard) or e-mail to dataprotection@wiltshire.gov.uk .”

CHIPP253

To the Planning Officer, Wiltshire Council

From: [REDACTED]

07/03/21

I fully support Chippenham Town Council's rejection of the proposed Local Plan and have therefore reproduced the Council's response verbatim here as fully representative of my personal views and response to the consultation:

Comments on Emerging Spatial Strategy (Chippenham)

Housing Figures: It is not clear whether the housing figures set out in Paragraph 1.1 of the document are up to date and have been amended to reflect the changes to the Government's Standard Method in December 2020, or the impact of the COVID-19 pandemic and economic recession on population and migration figures. I do not agree that there should be two housing figures (a lower and higher figure) as this confuses things. The Government has provided a Standard Method to calculate a housing figure for an area and this should be the only figure that is used. The higher figure is questionable particularly since the 2019 Local Housing Needs Assessment, from which this figure is derived, is based on even earlier projections of economic growth taken from the 2017 Economic Development Needs Assessment. Given the subsequent economic recession due to the COVID-19 pandemic, together with the fact that Wiltshire Council have not justified using a higher figure in aid of Paragraph 73 of the NPPF, there appears to be no justification for setting a higher figure of 45,630, and the Standard Method figure of 40,840 should be used. I object to the use of the higher figure when the Standard Method will be challenging enough to meet given the downward economic trend. The housing target allocated to Chippenham is much too high (at 9,225 and equivalent to 20% of the total number for Wiltshire), bears no relation to Chippenham's actual housing needs and is predicated on substantial numbers of people relocating here, in order to commute back out, causing more congestion and significant damage to the climate. There is concern about the impact of such large scale development on traffic, existing green spaces and cycleways. Wiltshire Council has not provided sufficient evidence to justify the housing numbers for Chippenham. The ONS growth rate, cited in the Housing Needs Assessment for the Chippenham Neighbourhood Plan, equates to a need for approximately 2500 new dwellings for Chippenham. The Chippenham housing numbers, and their location, should not be dictated by a grant application for a distributor road, which did not undergo any public consultation, and which serves to predetermine the Spatial Strategy. The decision to run the Local Plan Review consultation and the Future Chippenham consultation side by side has created confusion amongst the general public. Wiltshire Council needs to develop an alternative Spatial Strategy, which is employment led, "appropriate in scale" and "environmentally sustainable" (as stated in the Vision for the Chippenham Neighbourhood Plan).

Brownfield Target: I consider there should be an ambitious approach to prioritising use of brownfield sites through the provision of a brownfield target that is included within the overall housing target, so as to maximise the use of increasingly available brownfield office and industrial locations as a result of the COVID-19 pandemic, and the recent 'change in use'

provisions. These sites are able to deliver substantial numbers of homes on small footprints (e.g. the 333 low carbon homes proposed at Langley Park) and have the advantages of being affordable, close to the town centre, reducing the need for cars and helping keep the town centre alive. I should be open to further opportunities for changing building use in response to reducing need for retail. Paragraph 65 of the NPPF states that: “within the overall requirement, strategic policies should also set out a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development and any relevant allocations”. Paragraph 66 continues “where it is not possible to provide a requirement figure for a neighbourhood area, the local planning authority should provide an indicative figure, if requested to do so by the neighbourhood planning body”. In the Local Plan Review an indicative housing figure is provided for the urban area but not the Parish (neighbourhood area). The CTC Neighbourhood Plan has requested that Wiltshire Council provide a figure for the neighbourhood area, but this has not been forthcoming. I do not agree with the approach proposed that an indicative housing figure be provided for an urban area, and request that this is changed to follow government guidance, and separate figures should be supplied to Chippenham for neighbourhood planning purposes: Chippenham’s housing requirement; Chippenham’s windfall expectation (which is included within the Chippenham housing requirement); and Strategic additional housing requirement. The Local Plan Review proposes that the Local Plan allocates no land for brownfield development in Chippenham in the period up to 2036. The brownfield target figure is derived from past windfall figures and is in addition to the housing requirement figure for the area. It is then taken off the housing requirement for future Local Plan reviews. The above methodology appears muddled, with the brownfield target considered to be external to the housing requirement figure, yet windfall considered to be internal to the housing requirement figure. It is more than likely that some windfall development will occur on brownfield land. This is not splitting straws—allocations, indicative housing requirements, brownfield targets, windfall targets are all different concepts in planning and are not interchangeable. This causes difficulties for the CTC Neighbourhood Plan in a number of ways. First, the ‘brownfield target’ is based on past windfall figures (brownfield and windfall are not synonymous). The CTC Neighbourhood Plan does not allocate housing on brownfield sites but anticipates that brownfield development will occur on the Bath Road Car Park/Bridge Centre site (as part of mixed-use development) and in the town centre as residential conversions. Therefore, there will be new housing supplied in the town and this should be subtracted from the overall total. This might mean that the Strategic Allocations could be reduced in size. However, because the Local Plan Review is treating brownfield sites in addition to housing requirement met on Strategic Allocations, there is no scope to consider the town’s overall needs. In addition, Paragraph 3.11 of the Emerging Spatial Strategy refers to setting a brownfield target for the next 10 years of the Local Plan period, not for the whole of it. Firstly, I do not agree that the brownfield target should be in addition to the overall housing requirement figure. Secondly, I consider any brownfield target should align with the Plan period. I believe brownfield provision for Chippenham could be higher than the 240 houses proposed, given the potential for brownfield sites to come forward because of the COVID-19 pandemic and the change of use provisions. I recommend that Wiltshire Council further investigate allocating brownfield sites in their Plan, to reduce the amount of greenfield development proposed.

Addressing Climate Change & Biodiversity Net Gain

A1: Land-use policies need to be evidence based, realistic, viable and achievable. Is it reasonable to assume that the Local Plan can deliver outcomes that significantly reverse existing carbon emission trends before 2030?

Yes. It is possible for the plan to reduce dependency on car travel and to ensure future development is net carbon neutral. This would be in keeping with the policies being pursued by the CTC Neighbourhood Plan (e.g. on climate change, sustainable transport and electric vehicle charging). Imaginative approaches to transport across Wiltshire such as developing and connecting new rail stations (Devizes Gateway, Corsham and potentially Hullavington) with frequent, reliable, low carbon road transport, park and ride etc. could make a real impact on reducing the use of cars in Wiltshire and relieving traffic pressure on Chippenham. Any new roads built must prioritise cycling over car use, as an incentive to travel by sustainable transport modes and reverse carbon emissions.

A2: What practical and achievable steps should the Local Plan take to significantly reduce carbon emissions by 2030?

Please refer to CTC Neighbourhood Plan policies on carbon neutral development, sustainable construction, renewable energy, provision and enhancement of cycle paths, access to the bus network, electric vehicle charging infrastructure, biodiversity and green corridors as examples of policies I would like the Local Plan to emulate.

A3: How should these actions be delivered and measured?

They should be delivered through local employment-led development and policies such as the ones highlighted above. These should be measured in terms of their net carbon emissions over time and adjusted accordingly in line with Government and Wiltshire carbon reduction targets.

B1: If I are to successfully tackle flood risk and promote sustainable water management, would the measures set out above go far enough?

Avoid building on the low lying land adjacent to existing flood plains and within Flood Zones 2 and 3, and to reduce future flooding risk to other communities in lower parts of the Avon such as Melksham, Bradford on Avon and Bath

B2: If I are to successfully enhance our natural capital through place shaping and nature based solutions, would the measures set out above go far enough?

Avoid building on land that will destroy natural capital, which is finite and irreplaceable, rather than trying to mitigate the consequences.

B3: If we are to successfully plan for a net zero carbon future through sustainable design and construction, would the measures set out above go far enough?

I would endorse the UKGBC approach and use of sustainability statements suggested, which CTC is looking to adopt in its Neighbourhood Plan Carbon Neutral Development policy.

B4: Is the move to a position where all new development is rated as zero carbon achievable from the date the Local Plan is adopted (i.e. from 2023)? How might this be achievable and if not, why not?

By undertaking viability assessments on strategic sites as part of the revised Plan, as is now required, the viability of proposed development will be clear from the outset and developers will price any additional costs into their land purchase. Once a clear policy has been set, the additional costs of carbon neutral development will fall rapidly, as this becomes the standard method of building and developing sites. Government net zero carbon targets require this to happen as soon as possible (i.e. from 2023 or sooner). I would like to see this policy adopted immediately.

B5: Would a move to support the delivery of zero carbon new development materially affect scheme viability? Please refer to the answer given to B4

B6: In terms of performance standards for new buildings, what method(s) should the Council aim to implement?

The improvement in Part L of the Building Regulations being introduced as part of the Future Homes Standard is necessary but not sufficient in achieving net zero carbon development. The Government has indicated that it will not restrict local authorities from exceeding this standard, which many are already doing through their local plan policies. Please refer to the CTC Neighbourhood Plan Carbon Neutral Development policy for further guidance.

B7: How should the Council support the retrofitting and modernisation of existing buildings to achieve higher performance and reduce carbon emissions?

It should have policies which support the retrofit of insulation (including double glazing) and renewable energy generation devices (e.g. solar panels and ground source heat pumps).

B8: If we are to make headway in terms of decarbonising energy production, consumption and emissions, would the measures outlined above go far enough? If not, what are we missing and how would additional measures be delivered?

All development should be required to meet net zero carbon standards in line with the UKGBC approach (i.e. energy efficiency, on-site renewable energy and heat generation and carbon offset for any remaining operational emissions) with immediate effect if at all possible.

B9: Should the Council set out policies that favour particular technologies, or should it encourage all technologies to provide green energy in Wiltshire?

It should allow for all technologies but take account of their effectiveness, efficiency and any potential environmental and social impacts. And accommodate future innovation in technologies.

B10: Should the Local Plan set targets for the production and use of renewable energy? If so, what might they be and how would they be measured?

Yes. Local Authorities have a key role in ensuring the UK meets its climate change targets. Section 18(1A) of the updated NPPF requires the planning system support the transition to a low carbon economy and in particular “should help shape places that contribute to radical reductions in greenhouse gas emissions” and that “Plans should take a proactive approach to mitigating and adapting to Climate Change... in line with the objectives of the Climate Change Act.” I therefore recommend that the Local Plan sets a net zero target based on an assessment of its carbon reduction potential and develops policies consistent with this target. The generation of renewable energy will be critical in achieving this target, alongside sustainable development locations and carbon neutral development policy. A carbon inventory approach could be used to check progress

B11: What steps should be taken to retrofit existing buildings with ultra-low or zero carbon forms of energy production? In particular, how could such technology be incorporated into buildings within sensitive locations such as Conservation Areas and/or Listed Buildings?

Existing policy already allows for retrofitting and adapting existing buildings to accommodate ultra-low carbon or zero carbon forms of energy production in conservation areas and listed buildings, providing they are sympathetic to their setting and significance, and this balance should be maintained.

B12: If we are to tackle issues associated with air quality would the measures set out above go far enough and be effective in improving air quality in Wiltshire? If not, what measures are we missing and how should they be framed in land-use planning policy? A local employment-led development approach, and supporting policies, would prevent large scale commuting and sustainable travel options within sites, and would reduce the need to use cars for local journeys. Employment development should be for high quality attractive jobs in order to minimise out-commuting and deliver the best value for our communities. Policies to control the use of wood burning stoves/heating in densely built-up areas would help reduce non-vehicular air pollution. Increasing modal shift to public and active transport will not be achieved with the 'business as usual' approach to delivering cycling infrastructure or bus improvements as previously seen in Chippenham. A comprehensive strategy for cycling, walking and public transport is needed to fully analyse current, future and potential demands, and to set out how continuous networks will be delivered. Even if this can only be delivered at the cost of the loss of on-street parking or vehicle access. Unless sustainable transport networks can be established which are as quick and safe as routes for motor vehicles, modal shift will not occur. Whilst the shift to greener fuelled vehicles will in part improve local air quality through the reduction of emissions, it is not an all-encompassing solution to our problems. More than half of the UK's electricity is produced through non-renewable sources, and if electric vehicle uptake expands too quickly demand for power will in the short to medium term likely come from coal and gas. Electric cars still take up as

much road space as petrol cars -meaning they will still cause congestion thereby making bus travel slower and less reliable. Electric vehicles will still sit idle in parking spaces on the side of roads for most of the day, limiting highway space which could be transferred to walking and cycling infrastructure, and results in severance for pedestrians and reduces the perception of safety for cyclists.

B13: What practical policy steps should the Local Plan take to significantly increase modal shift to public and active transport, and speed up the transition to greener fuelled vehicles?

Install on-street EV charging infrastructure throughout Chippenham and in other parts of the county (particularly larger market towns) as soon as possible. Whilst sustainable transport infrastructure can encourage some modal shift, it has to be complemented with travel demand management. Inexpensive and plentiful parking results in the use of private car being the easiest mode choice, even for basic trips. A policy is therefore required to seek a reduction in parking supply and an increase in the cost of parking. Should the distributor road that will serve the proposed development in the south and east of Chippenham be formally proposed in the Local Plan then supporting policies will be required which limit through-traffic within Chippenham by implementing restrictions to private cars, and to transfer existing highway space to cycle, walking and bus infrastructure. Consideration should be given to transport hubs at strategic locations, intercepting longer distance trips by private vehicle and providing sustainable means of onward travel to employment, retail, leisure and education.

B14: The electricity grid system may not be able to cope with a rapid take-up of electric vehicles and the charging infrastructure needed to power them? What measures should the Council explore with Distribution Network Operators/Distribution Service Operators to resolve this?

More local renewable energy generation and policies which support this. Wiltshire should be more proactive in terms of working out how the distributor grid should work effectively.

B15: If all new development is to be future proof and promote zero carbon living in energy production and consumption terms, what impact would this have on the design and viability of schemes?

Forward thinking policies of the type described above. Viability will quickly catch up.

Planning for Chippenham

CP1. What do you think to this scale of growth? Should there be a brownfield target? Should they be higher or lower?

Scale of growth: The housing target allocated to Chippenham is much too high (at 9,225 and equivalent to 20% of the total number for Wiltshire), bears no relation to Chippenham's actual housing needs and is predicated on substantial numbers of people relocating here, in order to commute back out, causing more congestion and significant damage to the climate.

There is concern about the impact of such large scale development on traffic, existing green spaces and cycleways. Wiltshire Council has not provided sufficient evidence to justify their housing numbers for Chippenham. The ONS growth rate, cited in the Housing Needs Assessment for the Chippenham Neighbourhood Plan, equates to a need for approx. 2500 new dwellings for Chippenham. The Chippenham housing numbers, and their location, should not be dictated by a grant application for a distributor road, which did not undergo any public consultation, and which serves to predetermine the Spatial Strategy. The decision to run the Local Plan Review consultation and the Future Chippenham consultation side by side has created confusion amongst the general public. Wiltshire Council needs to develop an alternative Spatial Strategy, which is employment led, “appropriate in scale” and “environmentally sustainable” (as stated in the Vision for the Chippenham Neighbourhood Plan).

Brownfield target: See above response in Emerging Spatial Strategy

CP2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?

On the whole these priorities match the Town Council’s priorities and the CTC Neighbourhood Plan Vision. However, I recommend amending the priorities in line with the suggestions below:•

“i) Development to provide new employment opportunities...” Add reference to ensuring that there is a mix of employment types/uses/buildings on employment land to help SME’s and incubator units establish (in line with the CTC Neighbourhood Plan policy on Incubator Units)

Allocating employment land will not simply solve the problem of uptake. There needs to be a much more proactive lead from Wiltshire Council to help/encourage businesses to establish in Chippenham. Local employment opportunities need to be provided followed by housing provision, so as to avoid more commuting and car dependency (not the other way around).

•“ii) Improving the resilience of the town centre by...” Add references to other key sites identified in the CTC Neighbourhood Plan –these being Upper Market Place public realm improvements and River-Green Corridor masterplan I request that Wiltshire Council investigate how retail uses in the town centre can be retained in the light of current and proposed changes to enable E Class uses to switch to C3 uses in town centres as permitted development. Specific consideration needs to be given on how to retain the integrity of the historic town centre for retail and services. This will be a problem in all Wiltshire town centres and it should be addressed in the Local Plan Review.

• “v) Linking the A4 to the A350 which will provide for a more resilient local network...” Delete reference to the above. I consider roads as infrastructure required for development i.e. ‘essential infrastructure’ rather than ‘place shaping infrastructure’ as defined by CP3 of the Wiltshire Core Strategy. I would also be concerned about the impact of developing the road network on the town’s character, local natural capital, heritage features and wildlife habitats.

- Mention emphasis on protecting green spaces in town and enhancing biodiversity on these (particularly River Avon corridor)

- Would benefit from including a community infrastructure priority (in line with the CTC Neighbourhood Plan Vision)

- Would benefit from including sustainability priority i.e. carbon neutral development, sustainable building construction, sites for renewable energy

CP3. Do you agree these sites are the most appropriate upon which to build? If not, why not?

The proposals to develop large suburbs to the east (Site 1) and south (Site 2) would have a severe adverse impact on the town and cause unacceptable damage to the local environment through the destruction of high-quality farmland and wildlife habitat in the Avon and Marden Valley. The site selection criteria used in the Sustainability Appraisal is completely biased. It lumps together environment, landscape and climate into a single criteria and then discounts against speculative economic benefits, for which there is no evidence. A subjective methodology is also used to dismiss alternative options involving other sites, which would not require the costly and carbon intensive infrastructure of Sites 1 and 2. No brownfield or town centre sites are included as alternative options, even though town centre redevelopment has great potential to improve and restore the town's character and vibrancy. Sites 1 and 2 appear to have been selected purely for commercial reasons (i.e. Wiltshire Council owned land) and happen to coincide with the route of the proposed distributor road

CP4. What are the most important aspects to consider if these sites are going to be built on?

I consider the most important aspects to be:

- ACCESS TO INFRASTRUCTURE Access to existing and new public transport (including bus route provision to the town centre and railway station), employment, community infrastructure, schools and surgeries is very important. The CTC Neighbourhood Plan Pre-Vision Survey found that the second most important thing that the local community wanted to see in a 'future Chippenham' was the 'expansion of leisure, sport and recreation facilities'. Electric vehicle charging infrastructure needs to be provided (in line with the CTC Neighbourhood Plan policy).

- LAND ALLOCATION FOR RENEWABLE ENERGY The CTC Neighbourhood Plan, together with the Centre for Sustainable Energy (CSE), carried out a community workshop in 2020 on Future Energy Needs. It found that Chippenham was poor in covering its carbon footprint, and even if renewable energy measures were implemented as per the community's hypothetical energy plan it would only have provided 24% of Chippenham's annual electricity demand and 7% of its annual heat demand. Sitably sized land within the development needs to be allocated for renewable energy that can generate electricity for the development to make it self-sufficient, and also generate it for the wider town.

- GREEN BUFFER** It is important that green buffers to the surrounding countryside are substantially planted with trees, in line with the CTC Neighbourhood Plan policy. I recommend that new development boundaries are final (i.e. not to be changed in the next review of the Local Plan).

- GREEN CORRIDORS & LOCAL GREEN SPACES** Impact on access, amenity and biodiversity of existing Green Corridors and Local Green Spaces are identified as important by the CTC Neighbourhood Plan, i.e. River Avon corridor, Wilts & Berks Canal, Chippenham-Calne cycle path. Existing green corridors which cross Pewsham Way need to be improved, both for human travel and wildlife. Existing green spaces and parks were the second most popular item that the local community liked about living in Chippenham, according to the results of the Neighbourhood Plan Pre-Vision Survey.

- WALKING AND CYCLE PATHS** It is important that new development ties into the existing footpath and cycle path network, the adjacent urban area, the countryside, and key nodes such as the town centre and railway station. Without modification, Pewsham Way, in its current form, would present a barrier to any development on Site 2 linking into the existing urban area e.g. Pewsham to the north. Such roads should be incorporated within the 'development sites' to ensure that they are upgraded to provide for pedestrian and cycle friendly infrastructure and linkages (plus the incorporation of wildlife crossings across main roads where green corridors have been identified). With regard to Site 2 there would also need to be improved linkages to the south to Lacock.

- LANDSCAPE & VISUAL IMPACT** The landscape and visual impact of any development from the countryside, and surrounding villages such as Tytherton Lucas, Pewsham village & Derry Hill is important. The CTC Neighbourhood Plan seeks to avoid coalescence with neighbouring villages, and this was something that was highlighted as an issue in early discussions with neighbouring parishes, and repeated within the Pre-Vision Survey results.

- CARBON NEUTRAL DEVELOPMENT & SUSTAINABLE BUILDING CONSTRUCTION** All new development should be carbon neutral and be sustainably constructed

- BIODIVERSITY NET GAIN** All new development should demonstrate biodiversity net gain

- DESIGN PRINCIPLES** The CTC Neighbourhood Plan has worked up a Design Guide for new housing based on community consultation from three housing workshops held for the general public in 2020. Wiltshire Council's design principles are not borne out of any community consultation and are detailed (rather than strategic) principles that are better suited to the CTC Neighbourhood Plan to incorporate.

Key views between the town and countryside shown on Figure 8 of the Chippenham Landscape Setting Assessment Report for the Chippenham Site Allocations Plan DPD, and restated in the draft Neighbourhood Plan Design Guide, do not appear to be reflected in the concept plans.

The CTC Neighbourhood Plan Design Guide includes a main park at the local centre. The concept plans do not align with this. This should be reflected as a design principle.

Housing needs to be designed to provide high quality living conditions e.g. to National Technical Standards, bin storage, bike storage, balconies for apartments.

New tree-lined main streets within the development must not act as a barrier to pedestrians or wildlife.

A blanket density of 35dph would be quite dense and does not leave much scope for gardens for food or biodiversity. It would be better to ensure a mix of densities across the wider sites: with lower densities (15-25dph) with large plots/large houses at outer areas, and higher densities (40-60dph), including 3-4 storey apartment blocks, at local centres/road corridors.

“All homes within 400m of a Local Equipped Area of Play (LEAP)”. Suggest deleting reference, as most LEAPs are poor, and the equipment is suitable either for very young children, or for older children, thereby making them unattractive for many families within the communities they are intended to provide for. The community would be willing to walk further to access fewer, but larger and more diverse, NEAPs or MUGAs.

CP5. How can these concept plans be improved? I am surprised at the level of detail shown on the concept plans/masterplans at this early stage in the process. This level of detail is not strategic, and the Local Plan should not be dealing with this. It should be left to the CTC Neighbourhood Plan (and adjoining neighbourhood plans where sites fall outside the CTC Parish) to deal with, since community input has shaped the CTC Design Guide, and the CTC Guide can then be translated into an appropriate masterplan.

CP6. Do you agree with the range of uses proposed, what other uses should be considered? I broadly agree with the range of uses. The inclusion of renewable energy uses will be critical in achieving UK climate change targets.

CP7. Do you agree with the location of the proposed uses? What should be located where - and why?

Please see my response to CP5 that I believe the CTC Neighbourhood Plan is best placed to masterplan sites within the CTC Parish, according to the CTC Design Guide principles and community input into this. I am concerned with the location of employment land and local centre on Site 1. This should be located further south at the heart of the site, rather than on its outskirts adjacent to the Chippenham-Calne cycle path. Located here, noise and lighting generated from these uses would have an adverse impact on the quality of the green corridor, identified by the CTC Neighbourhood Plan as important for amenity, tranquillity and biodiversity. A local employment-led development approach and supporting policies to reduce car dependency should dictate the location of employment land and prevent large scale commuting, whilst sustainable travel options within sites would reduce the need to use cars for local journeys. Green space along the development site boundaries should not be left as farmland and there should be substantial tree belts planted to offset carbon, increase biodiversity, prevent future urban sprawl, and screen views of new development from the countryside.

CP8. Do you agree with the location and amount of employment provided on Sites 1 and 2?

I have concerns that simply allocating employment land does not guarantee employers will locate there or necessarily attract the skilled employment opportunities to allow people to

live near where they work. The CTC Neighbourhood Plan Pre-Vision Survey found that the third most important thing that the local community wanted to see in a 'future Chippenham' was that the town was 'attractive to business and employment'. 8ha of employment land does not appear sufficient to support the new 'sustainable communities' being proposed, when compared to the 26.5ha of employment land required under the current Core Strategy and where fewer houses were being proposed. Employment sites should be required to accommodate a range of unit sizes/types, including incubator units. Evidence collected from the Neighbourhood Plan is that existing employment land in Chippenham at Bumpers Farm Industrial Estate, Methuen Park and Parsonage Way does not have additional space or capacity for incubator units, despite there being demand for smaller units of less than 5000 sq. ft. in the local area. Future allocated employment land is either not being built out, or if it is being built out is being developed for large distribution/warehouse units, which are less beneficial for the local economy and job market. A key requirement is that employment land be located where it can be easily accessed by sustainable transport. Please refer to answer to CP7 regarding the location of employment on Site 1.

CP9. Do you agree with the proposed locations for self build and custom build housing? Would you prefer alternative locations?

No comments to make.

CP10. Do you agree with the proposed sites for renewable energy? Is there a particular type of renewable energy that should be provided?

I agree that there should be sites proposed for renewable energy and the CTC Neighbourhood Plan is exploring this. However, renewable energy sites identified on the concept plans would need to be larger than shown to actually make a difference/be viable. Solar energy and wind energy (away from any residential areas) were found to be the local community's preferred type of renewable energy on new sites at the Neighbourhood Plan's Future Energy Needs community workshop.

CP11. Site 1 –Do you agree with the proposal for some housing to be located north of the North Rivers cyclepath?

I do not agree with built up areas (either north or south) being located adjacent to the cycle path, which has been identified by the CTC Neighbourhood Plan as a green corridor. Located here, noise and lighting would have an adverse impact on the quality of the green corridor in terms of amenity, tranquillity and biodiversity. Housing located north of the cycle path would be contrary to policies in Bremhill's Neighbourhood Plan.

CP12. Site 1 –Are there any uses that would be most suitable for Hardens Farm and New Leazes Farm?

Agriculture/food production.

CP13. Is there anything we have missed that needs to be considered in planning for Chippenham?

I recommend that the table beginning on Page 20 is split into “strategic” and “local”. All the local needs can then be moved into the CTC Neighbourhood Plan. There would then be two complementary tables to each be delivered in the right document. Under the ‘Employment’ section of the table the view of Wiltshire Council that Chippenham is attractive for employment appears somewhat optimistic, given the town’s allocated employment sites are/have not been built out/attractive to the market.

Yours sincerely

██████████

CHIPP273

Chippenham Consultation Response Form

Ref:

(For official use only)

A series of 'Planning for' documents break down the work undertaken so far for each Principal Settlement and Market Town. Within these documents, information is presented, and questions asked to help shape proposals for each place.

To view these documents please visit the Council's Local Plan Review Consultation page on its website at: <https://www.wiltshire.gov.uk/planning-policy-local-plan-review-consultation>

Please return to Wiltshire Council by Tuesday 9th March 2021.

By post to: Spatial Planning, Economic Development and Planning, Wiltshire Council, County Hall, Bythesea Road, Trowbridge, Wiltshire, BA14 8JN.

By e-mail to: spatialplanningpolicy@wiltshire.gov.uk

This form has two sections:

Section One – Personal details

Section Two – Your response to the questions. Please use a separate sheet for each representation.

Section One – Personal details

*if an agent is appointed, please fill in your Title, Name and Organisation but the full contact details of the agent must be completed.

| | 1. Personal details | 2. Agent's details (if applicable)* |
|----------------------------------|-------------------------|-------------------------------------|
| Title | █ | |
| First name | █ | |
| Last name | █ | |
| Job title (where relevant) | Planning Officer | |
| Organisation (where relevant) | Chippenham Town Council | |
| Address Line 1 | The Town Hall | |
| Address Line 2 | High Street | |
| Address Line 3 | Chippenham | |
| Address Line 4 | Wiltshire | |
| Postcode | SN15 3ER | |

| | | |
|------------------|----------------------|--|
| Telephone Number | 01249 446 699 | |
| Email Address | ████████████████████ | |

Section Two – Questions

CP1. What do you think to the scale of growth? Should there be a brownfield target?
Should this figure be higher or lower?

Answer:

Scale of Growth

The housing target allocated to Chippenham is much too high (at 9,225 and equivalent to 20% of the total number for Wiltshire), bears no relation to Chippenham’s actual housing needs and is predicated on substantial numbers of people relocating here, in order to commute back out, causing more congestion and significant damage to the climate. There is concern about the impact of such large scale development on traffic, existing green spaces and cycleways.

Wiltshire Council has not provided sufficient evidence to justify the housing numbers for Chippenham. The ONS growth rate, cited in the Housing Needs Assessment for the Chippenham Neighbourhood Plan, equates to a need for approximately 2500 new dwellings for Chippenham. Over 2,000 houses approved in the previous Local Plan have yet to be built or receive planning permission, casting further doubt on the need for such large-scale development.

The Chippenham housing numbers, and their location, should not be dictated by a grant application for a distributor road, which did not undergo any public consultation, and which serves to predetermine the Spatial Strategy. The decision to run the Local Plan Review consultation and the Future Chippenham consultation side by side has created confusion amongst the general public.

Wiltshire Council needs to develop an alternative Spatial Strategy, which is employment led, “appropriate in scale” and “environmentally sustainable” (as stated in the Vision for the Chippenham Neighbourhood Plan).

Brownfield Target

We consider there should be an ambitious approach to prioritising use of brownfield sites through the provision of a brownfield target that is included within the overall housing target; so as to maximise the use of increasingly available brownfield office and industrial locations as a result of the COVID-19 pandemic, and the recent ‘change in use’ provisions. Brownfield sites are able to deliver substantial numbers of homes on small footprints (e.g. 333 low carbon homes proposed at Langley Park) and have the advantages of being affordable, close to the town centre, reducing the need for cars, and helping keep the town centre alive. We should be open to further opportunities for changing building use in response to reducing need for retail.

Paragraph 65 of the NPPF states that: *“within the overall requirement, strategic policies should also set out a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development and any relevant allocations”*. Paragraph 66 continues *“where it is not possible to provide a requirement figure for a neighbourhood area, the local planning authority should provide an indicative figure, if requested to do so by the neighbourhood planning body”*.

In the Local Plan Review an indicative housing figure is provided for the urban area but not the Parish (neighbourhood area). Our Neighbourhood Plan has requested that Wiltshire Council provide a figure for the neighbourhood area, but this has not been forthcoming. **We do not agree with the approach proposed that an indicative housing figure be provided for an urban area, and request that separate figures should be supplied to Chippenham for neighbourhood planning purposes in line with government guidance:** namely Chippenham's housing requirement; Chippenham's windfall expectation (which is included within the Chippenham housing requirement); and strategic additional housing requirement.

The Local Plan Review proposes that the Local Plan allocates no land for brownfield development in Chippenham in the period up to 2036. The brownfield target figure is derived from past windfall figures and is in addition to the housing requirement figure for the area. It is then taken off the housing requirement for future Local Plan reviews.

The above methodology appears muddled, with the brownfield target considered to be external to the housing requirement figure, yet windfall considered to be internal to the housing requirement figure. It is more than likely that some windfall development will occur on brownfield land. This is not splitting straws – allocations, indicative housing requirements, brownfield targets, windfall targets are all different concepts in planning and are not interchangeable.

This causes difficulties for our Neighbourhood Plan in a number of ways. The 'brownfield target' is based on past windfall figures (brownfield and windfall are not synonymous). Our Neighbourhood Plan does not allocate housing on brownfield sites but anticipates that brownfield development will occur on the Bath Road Car Park/Bridge Centre site (as part of mixed-use development) and in the town centre as residential conversions. Therefore, there will be new housing supplied in the town and this should be subtracted from the overall total. This might mean that the Strategic Allocations could be reduced in size. However, because the Local Plan Review is treating brownfield sites in addition to housing requirement met on Strategic Allocations, there is no scope to consider the town's overall needs.

In addition, Paragraph 3.11 of the Emerging Spatial Strategy refers to setting a brownfield target for the next 10 years of the Local Plan period, not for the whole of it.

Firstly, we do not agree that the brownfield target should be in addition to the overall housing requirement figure. Secondly, we consider any brownfield target should align with the Plan period.

We believe brownfield provision for Chippenham could be higher than the 240 houses proposed, given the potential for brownfield sites to come forward because of the COVID-19 pandemic and the change of use provisions. We recommend that Wiltshire Council further investigate allocating brownfield sites in their Plan, to reduce the amount of greenfield development proposed.

CP2. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?

Answer:

On the whole these priorities match the Town Council's priorities and our Neighbourhood Plan Vision. However, we recommend amending the priorities in line with the suggestions below:

- *"i) Development to provide new employment opportunities..."*

Add reference to ensuring that there is a mix of employment types/uses/buildings on employment land to help SME's and incubator units establish (in line with our Neighbourhood Plan policy on Incubator Units)

Allocating employment land will not simply solve the problem of uptake. There needs to be a much more proactive lead from Wiltshire Council to help/encourage businesses to establish in Chippenham.

Local employment opportunities need to be provided followed by housing provision, so as to avoid more commuting and car dependency (not the other way around).

- *"ii) Improving the resilience of the town centre by..."*

Add references to other key sites identified in our Neighbourhood Plan – these being Upper Market Place public realm improvements and River-Green Corridor masterplan.

We request that Wiltshire Council investigate how retail uses in the town centre can be retained in the light of current and proposed changes to enable E Class uses to switch to C3 uses in town centres as permitted development. Specific consideration needs to be given on how to retain the integrity of the historic town centre for retail and services. This will be a problem in all Wiltshire town centres and it should be addressed in the Local Plan Review.

- *"v) Linking the A4 to the A350 which will provide for a more resilient local network..."*

Delete reference to the above. We consider roads as infrastructure required for development i.e. 'essential infrastructure' rather than 'place shaping infrastructure' as defined by CP3 of the Wiltshire Core Strategy. We would also be concerned about the impact of developing the road network on the town's character, local natural capital, heritage features and wildlife habitats.

- Mention emphasis on protecting green spaces in town and enhancing biodiversity on these (particularly River Avon corridor)
- Would benefit from including a community infrastructure priority (in line with our Neighbourhood Plan Vision)
- Would benefit from including sustainability priority i.e. carbon neutral development, sustainable building construction, sites for renewable energy

CP3. What land do you think is the most appropriate upon which to build?

What type and form of development should be brought forward at the town?

Answer:

The proposals to develop large suburbs to the east (Site 1) and south (Site 2) would have a severe adverse impact on the town and cause unacceptable damage to the local environment through the destruction of high-quality farmland and wildlife habitat in the Avon and Marden Valley.

Sites 1 and 2 would require a distributor road be built across the Avon and Marden valley, serviced by a railway crossing, two extended river crossing and two canal crossings. None of this would be required without these excessive housing numbers.

The site selection criteria used in the Sustainability Appraisal is completely biased. It lumps together environment, landscape and climate into a single criteria and then discounts against speculative economic benefits, for which there is no evidence.

A subjective methodology is also used to dismiss alternative options involving other sites, which would not require the costly and carbon intensive infrastructure of Sites 1 and 2.

No brownfield or town centre sites are included as alternative options, even though town centre redevelopment has great potential to improve and restore the town's character and vibrancy.

Sites 1 and 2 appear to have been selected purely for commercial reasons (i.e. Wiltshire Council owned land) and happen to coincide with the route of the proposed distributor road. Designating such large sites seems to have been introduced into the Plan to support a business case for the distributor road (i.e. a circular argument that the road is needed for 7,500 houses, which are needed to then justify the road).

CP4. What are the most important aspects to consider if these sites are going to be built on?

Answer:

We consider the most important aspects to be:

- **ACCESS TO INFRASTRUCTURE**

Access to existing and new public transport (including bus route provision to the town centre and railway station), employment, community infrastructure, schools and surgeries is very important. Our Neighbourhood Plan Pre-Vision Survey found that the second most important thing that the local community wanted to see in a 'future Chippenham' was the 'expansion of leisure, sport and recreation facilities'.

Electric vehicle charging infrastructure needs to be provided (in line with our Neighbourhood Plan policy).

- **LAND ALLOCATION FOR RENEWABLE ENERGY**

Our Neighbourhood Plan, together with the Centre for Sustainable Energy (CSE), carried out a community workshop in 2020 on Future Energy Needs. It found that Chippenham was poor in covering its carbon footprint, and even if renewable energy measures were implemented as per the community's hypothetical energy plan it would only have provided 24% of Chippenham's annual electricity demand and 7% of its annual heat demand. Suitably sized land within the development needs to be allocated for renewable energy that can generate electricity for the development to make it self-sufficient, and also generate it for the wider town.

- **GREEN BUFFER**
It is important that green buffers to the surrounding countryside are substantially planted with trees, in line with our Neighbourhood Plan policy. We recommend that new development boundaries are final (i.e. not to be changed in the next review of the Local Plan).
- **GREEN CORRIDORS & LOCAL GREEN SPACES**
Impact on access, amenity and biodiversity of existing Green Corridors and Local Green Spaces are identified as important by our Neighbourhood Plan, i.e. River Avon corridor, Wilts & Berks Canal, Chippenham-Calne cycle path. Existing green corridors which cross Pewsham Way need to be improved, both for human travel and wildlife. Existing green spaces and parks were the second most popular item that the local community liked about living in Chippenham, according to the results of the Neighbourhood Plan Pre-Vision Survey.
- **WALKING AND CYCLE PATHS**
It is important that new development ties into the existing footpath and cycle path network, the adjacent urban area, the countryside, and key nodes such as the town centre and railway station. Without modification, Pewsham Way, in its current form, would present a barrier to any development on Site 2 linking into the existing urban area e.g. Pewsham to the north. Such roads should be incorporated within the 'development sites' to ensure that they are upgraded to provide for pedestrian and cycle friendly infrastructure and linkages (plus the incorporation of wildlife crossings across main roads where green corridors have been identified). With regard to Site 2 there would also need to be improved linkages to the south to Lacock.
- **LANDSCAPE & VISUAL IMPACT**
The landscape and visual impact of any development from the countryside, and surrounding villages such as Tytherton Lucas, Pewsham village & Derry Hill is important. Our Neighbourhood Plan seeks to avoid coalescence with neighbouring villages, and this was something that was highlighted as an issue in early discussions with neighbouring parishes, and repeated within the Pre-Vision Survey results.
- **CARBON NEUTRAL DEVELOPMENT & SUSTAINABLE BUILDING CONSTRUCTION**
All new development should be carbon neutral and be sustainably constructed
- **BIODIVERSITY NET GAIN**
All new development should demonstrate biodiversity net gain
- **DESIGN PRINCIPLES**
 - Our Neighbourhood Plan has worked up a Design Guide for new housing based on community consultation from three housing workshops held for the general public in 2020. Wiltshire Council's design principles are not borne out of any community consultation and are detailed (rather than strategic) principles that are better suited to our Neighbourhood Plan to incorporate.
 - Key views between the town and countryside shown on Figure 8 of the Chippenham Landscape Setting Assessment Report for the Chippenham Site Allocations Plan DPD, and restated in the draft Neighbourhood Plan Design Guide, do not appear to be reflected in the concept plans.
 - Our Neighbourhood Plan Design Guide includes a main park at the local centre. The concept plans do not align with this. This should be reflected as a design principle.
 - Housing needs to be designed to provide high quality living conditions e.g. to National Technical Standards, bin storage, bike storage, balconies for apartments.
 - New tree-lined main streets within the development must not act as a barrier to pedestrians or wildlife.

- A blanket density of 35dph would be quite dense and does not leave much scope for gardens for food or biodiversity. It would be better to ensure a mix of densities across the wider sites: with lower densities (15-25dph) with large plots/large houses at outer areas, and higher densities (40-60dph), including 3-4 storey apartment blocks, at local centres/road corridors.
- “All homes within 400m of a Local Equipped Area of Play (LEAP)”. Suggest deleting reference, as most LEAPs are poor, and the equipment is suitable either for very young children, or for older children, thereby making them unattractive for many families within the communities they are intended to provide for. The community would be willing to walk further to access fewer, but larger and more diverse, NEAPs or MUGAs.

For the identified preferred development sites at principal settlements, concept plans have been developed. Concept plans for each area show a way the land identified can be developed. They show the undeveloped land, areas suggested for development and possible locations for uses within them.

Please state which concept plan your answer is in relation to.

If your comments relate to both sites, please make it clear in each answer to which site your comments relate

Figures 2-10 i.e. concept plans for Sites 1, 2 and 3

CP5. How can these concept plans be improved?

Answer:

We are surprised at the level of detail shown on the concept plans/masterplans at this early stage in the process. This level of detail is not strategic, and the Local Plan should not be dealing with this. It should be left to our Neighbourhood Plan (and adjoining neighbourhood plans where sites fall outside our Parish) to deal with, since community input has shaped our Design Guide, and our Guide can then be translated into an appropriate masterplan.

CP6. Do you agree with the range of uses proposed, what other uses should be considered?

Answer:

We broadly agree with the range of uses. The inclusion of renewable energy uses will be critical in achieving UK climate change targets.

CP7. Do you agree with the range of proposed uses? What should be located where and why?

Answer:

Please see our response to CP5 that we believe our Neighbourhood Plan is best placed to masterplan sites within our Parish, according to our Design Guide principles and community input into this.

We are concerned with the location of employment land and local centre on Site 1. This should be located further south at the heart of the site, rather than on its outskirts adjacent to the Chippenham-Calne cycle path. Located here, noise and lighting generated from these uses would have an adverse impact on the quality of the green corridor, identified by our Neighbourhood Plan as important for amenity, tranquillity and biodiversity.

A local employment-led development approach and supporting policies to reduce car dependency should dictate the location of employment land and prevent large scale commuting, whilst sustainable travel options within sites would reduce the need to use cars for local journeys. Green space along the development site boundaries should not be left as farmland and there should be substantial tree belts planted to offset carbon, increase biodiversity, prevent future urban sprawl, and screen views of new development from the countryside.

CP8. Do you agree with the location and amount of employment provided on sites 1 and 2?

Answer:

We have concerns that simply allocating employment land does not guarantee employers will locate there or necessarily attract the skilled employment opportunities to allow people to live near where they work. Our Neighbourhood Plan Pre-Vision Survey found that the third most important thing that the local community wanted to see in a 'future Chippenham' was that the town was 'attractive to business and employment'.

8ha of employment land does not appear sufficient to support the new 'sustainable communities' being proposed, when compared to the 26.5ha of employment land required under the current Core Strategy and where fewer houses were being proposed.

Employment sites should be required to accommodate a range of unit sizes/types, including incubator units. Evidence collected from the Neighbourhood Plan is that existing employment land in Chippenham at Bumpers Farm Industrial Estate, Methuen Park and Parsonage Way does not have additional space or capacity for incubator units, despite there being demand for smaller units of less than 5000 sq. ft. in the local area. Future allocated employment land is either not being built out, or if it is being built out is being developed for large distribution/warehouse units, which are less beneficial for the local economy and job market.

A key requirement is that employment land be located where it can be easily accessed by sustainable transport. Please refer to our answer to CP7 regarding the location of employment on Site 1.

CP9. Do you agree with the proposed locations for self build and custom build housing? Would you prefer alternative locations?

If so, please explain.

Answer:

No comments to make.

CP 10. Do you agree with the proposed sites for renewable energy?

Is there a particular type of renewable energy that should be provided?

Answer:

We agree that there should be sites proposed for renewable energy and our Neighbourhood Plan is exploring this. However, renewable energy sites identified on the concept plans would need to be larger than shown to actually make a difference/be viable.

Solar energy and wind energy (away from any residential areas) were found to be the local community's preferred type of renewable energy on new sites at the Neighbourhood Plan's Future Energy Needs community workshop.

CP11. Site 1 - Do you agree with the proposal for some housing to be located north of the North Rivers cyclepath?

Answer:

We do not agree with built up areas (either north or south) being located adjacent to the cycle path, which has been identified by our Neighbourhood Plan as a green corridor. Located here, noise and lighting would have an adverse impact on the quality of the green corridor in terms of amenity, tranquillity and biodiversity. Housing located north of the cyclepath would be contrary to policies in Bremhill's Neighbourhood Plan.

CP12. Site 1 - Are there any uses that would be most suitable for Hardens Farm and New Leazes Farm?

Answer:

Agriculture/food production.

CP13. Are there important factors you think we've missed that need to be considered in planning for Chippenham?

Answer:

We recommend that the table beginning on Page 20 is split into "strategic" and "local". All the local needs can then be moved into our Neighbourhood Plan. There would then be two complementary tables to each be delivered in the right document.

Under the 'Employment' section of the table the view of Wiltshire Council that Chippenham is attractive for employment appears somewhat optimistic, given the town's allocated employment sites are/have not been built out/attractive to the market.

If you have any further comments you wish to make, please detail them below.

Future notification

I wish to be notified of any future updates relating to the Local Plan Review:

YES: NO:

Clicking yes will add you to the planning policy contact database. This will mean you are kept informed of any future planning policy updates and consultations.

Further information on how the Spatial Planning Department treats your personally identifiable information can be found by reading the privacy notice available via the link below:

<https://www.wiltshire.gov.uk/planning-privacy-notice>

Here you will also find information about how and why your data may be processed and your rights under the Data Subject Information Notice section further down the page.

Signature:

Date:

Thank you for completing this form.

Data Protection

Wiltshire Council has a duty to protect personal information and will process personal data in accordance with Data Protection legislation. The personal data you provide on this form will only be used for the purpose of the Wiltshire Development Framework. It may also be used for the prevention or detection of fraud or crime and in an anonymised form for statistical purposes. The data will be stored on computer and/or manual files. You have a right to a copy of your information held by any organisation, with some exemptions. To gain access to your personal data held by Wiltshire Council or if you have any Data Protection concerns please contact Wiltshire Council's Data Protection Officer on 01225 713000 (switchboard) or e-mail to dataprotection@wiltshire.gov.uk ."

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Note: this has been submitted as a Word document, as the Word provided form does not work with a large response to a question, text being apparently “lost” in the small boxes that do not go over pages.

The consultation is very difficult for a member of the public to follow and respond to, with questions being scattered over many sections of the plan. The online form does not allow saving of partially completed answers making it very dangerous to use for longer answers.

CP3. What land do you think is the most appropriate upon which to build?

Site 1 should not be selected as a site to build on.

The key reasons why the selection of Site 1 is not justified include:

- a. Employment should improve the self-containment of the town by providing more jobs for local people”. Site 1 is less attractive to businesses looking for employment land as it is the most remote from the A350 which Wiltshire Council promotes as key to growth prospects. Instead people with jobs outside Chippenham will be attracted to riverside housing and promulgate out-commuting.
- b. Avoiding the risk of flooding. Site 1 is upstream of Chippenham and will create the greatest risk of flooding of all sites. The flood plain is regularly flooded, the closure of Maud Heath’s Causeway has greatly increased. Wiltshire has a declared Climate Emergency. Developers will rely on SuDS but even the use of SuDS is questioned in Annex II “Consideration should be given to the inclusion of Sustainable Drainage Systems to control the risk of surface water flooding from impermeable surfaces. As this site covers a Source Protection Zone, the extent to which Sustainable Drainage systems can be used may be affected.”
- c. Landscape and biodiversity. The Landscape evidence report from 2015 concludes that for Site 1 is an “area where development would be more difficult to accommodate”. Site 1 is the most visually prominent from Chippenham and the surrounding rural and conservation villages, still completely unspoilt and therefore very rich in natural riparian vegetation and wildlife, with good access via footpaths and the North Rivers cycle track to enjoy the countryside. Bremhill Parish have commission two wildlife reports on Site 1 which show the rich and diverse nature of the ecology of the area. Upstream of Chippenham the Avon and Marden valleys should be left undeveloped to allow the wildlife to flourish, undisturbed by riverside paths, domestic animals and development.
- d. A premature decision with the impact of a Covid pandemic

There is a need for an urgent review of planning in the post Covid world. Rural areas such as ours should be evaluated for the ability for local provision of services, as more people work from home and need local access to shops, post offices, surgeries, schools. Perhaps limited development in rural areas around clusters of villages to reach crucial mass of people to have these services could provide this. At the same time town centres and the opportunity from unfortunate failed retail and leisure businesses can provide town centre residential development. The time for huge green field development based on outcommuting and on a premise of town centre services may well have passed.

Finally, and it pains me to write this as the Council has done many good things including the response to Covid. Wiltshire Council have eroded the trust with the residents of Tytherton Lucas in regards to planning, especially in their work with developers (including themselves as a major landowner in the guise of Future Chippenham). There is no clear separation of duties or unbiased value judgements and this is reflected in the tone and thrust of the reports around this consultation.

This also gives us no confidence that any mitigation required through the planning process in the future would take place and in the Council's enforcement of planning requirements for Site 1. This can be evidenced by:

- Wiltshire Council, in presenting this Site Selection, have ignored policies in the Bremhill Neighbourhood Plan with regards to development north of the North Rivers cycle route.
- Wiltshire Council have received a grant of £75m for a distributor road, with no consultation with Tytherton Lucas residents or Bremhill Parish Council on the need for this road. Instead we are presented with route options.
- Wiltshire Council planning officers have worked with developers to overturn modifications made by a Planning Inspector at the EIP on Chippenham Site Selection for the Rawlings Green site, to separate the development from surrounding villages. This will cause irreversible damage to the visual impact of development on Tytherton Lucas and the surrounding villages and countryside and overrides policies in the Langley Burrell Neighbourhood Plan.

CP11 Site 1 – Do you agree with the proposal for some housing to be located north of the North Rivers cyclepath?

No, there should be no development north of the cycle path, indeed there is a wider issue in that there should be no road north of the cycle track as well. The area is particularly landscape sensitive as shown with a mass of independent evidence including:

a) WILTSHIRE COUNCIL ASSESSMENT OF SITE 1 LANDSCAPE

The Chippenham Landscape Setting Assessment undertaken by TEP for Wiltshire Council in December 2014 has drawn together the existing character assessments and visual qualities and summarized:

- Strong visual connection between River Avon and limestone ridge to the south east;
- Enclosed character to slopes of floodplain created through mature hedgerows and linear woodland contrasting with open character to the floodplain;
- Wooded and rural character to the North Wiltshire Rivers Route a long-distance footpath and cycleway;
- Long distance views across the River Avon flood plain towards Bencroft Hill (limestone ridge);
- Long distance views towards Chippenham characterized by a wooded edge, most of the settlement screened except pockets of housing nestled in trees and occasional industrial building. The spire of St Paul's Church is a feature of the skyline;
- Wide open views across flat arable farmland with low hedgerows and infrequent hedgerow trees (present close to the River Avon);
- Limestone ridge forming a prominent backdrop to views throughout the landscape;
- Countryside has a strong sense of separation from Chippenham through strong wooded edge to the settlement;

- Separation between Chippenham and Tytherton Lucas.

The Landscape quality assessment categorizes the area as: 'Attractive and Peaceful and consistent with the wider judgements on landscape character. In summary the landscape is predominantly rural in character and either side of Stanley Lane and to the north of the North Wiltshire Rivers Route Cycleway. South of the Cycleway there are views across less intact boundaries to the urban edge of Chippenham, which considerably dilutes the remote, rural character and creates more of an urban fringe landscape.'

b) Report On Landscape of Site 1 (New Leaze Farm and Hardens Farm) by Gleeson 2015

In landscape terms, the Site Allocations Plan of 2015 notes that Site 1, " especially north of the cycleway, represents an area that is open and, like Rawlings Green, will have a wider landscape impact. This area has no obvious features that form a logical natural boundary " (paragraph 4.21). The Site Selection Report 2015 states that " development in this area would also need to avoid extending the town to a point that there are unacceptable impacts upon the character and setting to the villages of Tytherton Lucas and East Tytherton " (paragraph 4.9). Potential negative impacts and constraints include " development in this Area has the potential to reduce separation between Tytherton Lucas and Chippenham which would reduce its remote and tranquil character. In addition development would be visually prominent from surrounding high ground and could make this edge of Chippenham considerably more notable in the surrounding countryside " (criterion 5).

Evidence paper 4 (The Landscape Setting Assessment, 2014) has been carried out to inform the preparation of the Chippenham Sites Allocation Plan, by identifying the key landscape and visual characteristics of land around Chippenham and the key sensitivities and capacity of the settlement's landscape setting, and the setting to some of the outlying villages to accommodate development. A large part of Site 1 is also unsuitable for development as indicated by the following Evidence Paper extracts:

Encroachment of development - This Strategic Area is generally flat with long views possible across the landscape..... Development in this Strategic Area has the potential to reduce separation between Tytherton Lucas and Chippenham, which would reduce its remote and tranquil character. In addition development would be visually prominent from surrounding high ground and could make this edge of Chippenham considerably more notable in the surrounding countryside

Development Capacity - This is a landscape which is strongly associated with the Rivers Avon and Marden....Across much of this Strategic Area development would increase the prominence of the eastern edge of Chippenham and reduce the rural and remote character of the landscape and of Tytherton Lucas as well as being prominent in views from the limestone ridge. Any development that does take place within this landscape would need to seek to avoid the highest ground.... Large scale woodland is not characteristic of this landscape but would be required to adequately screen large scale employment development.

Enderby Associates has undertaken its own landscape assessment of the allocation on behalf of Gleeson Strategic Land. This assessment confirms that a large part of Site 1 is unsuitable for development in landscape and visual terms, as described below:

Whilst Site 1 has associations with both the adjacent urban and rural landscape, and proposed built form in this location would not introduce a completely new urban element into the landscape, it would result in the loss of open river valley landscape, and further erosion of the rural character of

the surrounding countryside, as highlighted in The Chippenham Landscape Setting Assessment (December 2014)

The area is crossed by three Public Rights of Way [BREM38, BREM39, and CHIP107] with some attractive open rural views across Site 1, and the wider Avon Valley and beyond to the limestone ridge at Wick Hill and Bencroft Hill

Site 1 is visible from elevated viewpoints on the limestone ridge to the east, at locations between Bencroft Hill and Wick Hill

Site 1 is also highly visible from several long lengths of the National Cycle Route 403, including views from the bridge over the River Avon

From these observations, it would appear that development on the sloping fields immediately below (north of) Hardens Mead would be acceptable from a landscape perspective. Development should not extend beyond the vegetated field boundaries at the foot of this slope on to the level fields around Harden's Farm to ensure that the open river valley landscape character is preserved and that the urbanising influence on the wider countryside is minimised

It is evident that development elsewhere in Site 1 would not be acceptable in landscape and visual terms – in particular, north of the National Cycle route 403, north of which the landscape character is distinctly rural nor should development extend (as proposed in the plan for Strategic Site 1) on to the higher land around Abbeyfields school, as noted in Council's own study underlined above. Employment uses would be particularly prominent in this area

The ring road which is proposed on the eastern edge of Site 1 would also be particularly damaging and have a significant adverse impact on the landscape and views, cutting across the grain of the landscape and not aligned with any landscape boundary features.

The site at Site 1 is located in a prominent area and there is no defensible edge to development, resulting in the encroachment of the urban area into a highly visible area of open countryside. The Site Allocations Plan stipulates that a strategic landscape scheme for the development must deliver some seemingly impossible objectives, given the site's prominence. For example, it must:

Create a bold landscape structure by reinforcing existing field boundaries and manage linear woodlands, and

Reinforce planting along the existing edges of Chippenham.

Even with these ambitious landscape proposals in place, we question whether this will be sufficient to ameliorate against the landscape impact of development in this area of Chippenham.

Finally, the sustainability appraisal considers the development of the site will have a, "limited adverse impact" on landscape (objective 7) with, "mitigation considered achievable". This is considered generous given the site's prominence in landscape terms. **Enderby Associates consider that the site would more appropriately be assessed as having "significant adverse impact", with "sustainability issues: mitigation considered problematic".**

The allocation of Site 1 is therefore in conflict with objective 5 of existing Wiltshire Core Strategy Policy 10, which seeks to minimise landscape impact and protect the natural, historic and built environment. This is exacerbated by the fact that because it is located to the east of the flood plain, the river valley separates the site from the rest of the built up area.

We do not consider the site's development for the level of proposed development to be justified when considered against reasonable alternatives, based on proportionate evidence. Because of significant infrastructure requirements, many of which are beyond the control of the landowners or developers, the full extent of the proposed allocation may also not be deliverable, thereby failing the test for policies being effective.

c) Tytherton Lucas Residents Association Independent Landscape Assessment

Tytherton Lucas Residents Association had an independent assessment of the landscape performed by WH Landscape Consultancy in 2015. The report included:

Although not covered by any statutory landscape designations **the river corridors and the surrounding countryside, particularly to the north of the cycle route, are of considerable landscape value**, being located in a tranquil and complete rural landscape and providing the landscape setting for the Tytherton Lucas Conservation Area.

This is highlighted by the proposed designation of the River Marden and its environs, within the Bremhill Parish boundaries, as area not for development in the Bremhill Neighbourhood Plan. This area has a low capacity and is susceptible to development. It is considered to have a High/Medium sensitivity and the magnitude of change will be Substantial, which will result in a Major to Major/Moderate adverse impact on the landscape resource, which cannot readily be mitigated.

The absence of any statutory designation (presumably not thought necessary for Wiltshire County farms, whose landscapes were managed for productivity rather than for "beauty") is, of course a major attraction for a land banker/developer.

The current proposals by Wiltshire Council indicate at least some development and a river crossing north of the cycle route, which is considered unacceptable in both cases in landscape terms.

To the south of the cycle route the landscape value is marginally lower and the susceptibility to change, although remaining in the Moderate adverse category, is also lower. Development would therefore have a lower adverse significance, than the area north of the Cycleway, due to a higher level of containment, a closer relationship with the urban edge of Chippenham, and a less intact receiving landscape with a diluted rural and remote character. However, despite this the landscape impacts of development in this area will remain significant and adverse.

Visually, the highest sensitivity receptors are users of the North Wiltshire Rivers Route, which follows the route of the former Chippenham to Calne railway and is an extremely popular tranquil and rural cycle path. It cuts through the northern part of site. At present users of the cycle route pass through a rural back-water until they reach the bridge over the River Avon. Over the years the embankments and track sides have become dominated by native shrub growth and mature native trees, which form a semi-natural landscape boundary.

Development will result in the visual character of the cycle route changing from rural tranquil to urban. Visually this will result in a Substantial adverse change to the view in which the nature of the existing view would change entirely. The North Wiltshire Rivers Route has a High receptor sensitivity, which indicates that the proposals will have a Major adverse impact on users of the cycle route. Users of other Public Rights of Way and residential properties in the vicinity will experience impacts in the range of Moderate/Major adverse. Although development to the south of the North Wiltshire Rivers Route will have a slightly lower visual significance than the area to the north, there will remain a significant change to views from the cycle route and from the limestone ridge to the south

and other local public rights of way, as well as residential views out over the countryside from Monkton Park.

CHIPP291

Wiltshire Local Plan Review: Emerging Strategy

Prepared by Savills
on behalf of Waddeton Park

1. Introduction

- 1.1 This Representation is made in response to the consultation on the Wiltshire Council (WC) Local Plan Review (LPR) 2016-2036. The representation is submitted by Savills on behalf of Waddeton Park who have a number of land interests across Wiltshire.
- 1.2 At the outset, we note that the plan period requires review. The base date, of 2016, is no longer appropriate given the delays in progressing the LPR, and the need for a comprehensive update of the evidence base. It is also necessary to extend the plan period: with the adoption of the LPR not anticipated until Q2 2023, it would fail to meet the requirement set out at paragraph 22 of the National Planning Policy Framework (NPPF) to have a minimum 15 year plan period.
- 1.3 The majority of the evidence base now requires updating, with most of the evidence drafted between 2016-2018; when the intention had been that the LPR would have been adopted by now. Following the update to the evidence base, the Authority should seek to ensure the LPR proceeds quickly to Examination to ensure that the evidence base does not become out of date again.
- 1.4 Of particular interest, the Authority have not yet updated the evidence supporting the housing requirement – and we recognise that this is due to the consultation document being drafted before the outcome of the Government’s consultation on the standard method was known. In proceeding to the next stage, a full update of the housing needs evidence base is required – including revised economic growth projections, and a detailed assessment of affordable housing need – with these both material in considering the nature of any uplift to the Local Housing Need (LHN) requirement.
- 1.5 This representation focuses on Waddeton Park’s interest in Land off Saltersford Lane, Chippenham and would welcome the opportunity to discuss this site further.

2. Emerging Spatial Strategy

Allocations, Housing Supply and Delivery

- 2.1 There is some uncertainty in regard to how allocations will be made across Wiltshire – and how this may vary depending on the respective settlement and individual site size. The housing strategy must be deliverable, and as such, at the Examination it must be clearly demonstrated that the scale of housing growth required for Wiltshire will be deliverable both in principle, and when the need arises.
- 2.2 The scale of the residual housing requirement across Wiltshire, and in particular in the Chippenham HMA (at 9,860 dwellings), is substantive. The allocation of a small number of large strategic sites is unlikely to be considered a robust strategy alone given the issues encountered on similar size sites within the adopted Core Strategy and the Chippenham Site Allocations Plan¹ – which will not see a single house delivered in the first 10 years post adoption of the plan. There must be a strategy in place to deliver housing on smaller sites in the short/medium term – as per paragraph 68 (NPPF).
- 2.3 This pertains both to the requirement to demonstrate a five year housing land supply on adoption of the LPR (as per paragraph 73, NPPF), but also the need to ensure that a housing trajectory sets out a realistic assessment of site delivery over the entire plan period.
- 2.4 Where there are circumstances where a Neighbourhood Plan is coming forward, this must be substantially advanced (i.e. Regulation 16 stage); and must positively address the housing requirements in the LPR. We note that these have been available in indicative form since 2018; and as such, three years have already passed when Neighbourhood Plans could have started the process of identifying suitable housing sites to meet these needs.
- 2.5 There is a clear role for the LPR to allocate a range of sites across the Principal Settlements and Market Towns to meet the short, medium and longer terms housing needs of Wiltshire.

¹ Ashton Park, Rawlings Green, West of Warminster

3. Addressing Climate Change and Biodiversity Net Gain

- 3.1 The national legislative and policy context in regard to climate change is going through a rapid change at the current time – with legislation anticipated on Future Homes, biodiversity net gain, energy provision, and electric vehicular charging within the coming months. Given the timelines anticipated with the LPR, it is likely that these will have taken place, or progressed significantly by the point at which the LPR is submitted to Examination. It is therefore going to be necessary for the LPR to be responsive to these.

Land Use Policies and Climate Change

- 3.2 By far the most significant opportunity to address climate change is through the spatial strategy with the delivery of a sustainable pattern of development (paragraph 11, NPPF). This is emphasised by the analysis provided within the supporting Paper which indicates 40% of Wiltshire’s Emissions pertain to transport (p9).
- 3.3 We have commented elsewhere within this consultation, that there is a lack of evidence supporting the Preferred Strategy. The size of an existing settlement is not a sufficient justification that further development represents the most appropriate sustainable pattern of development.
- 3.4 The consultation document references the emerging Local Transport Strategy – this must form part of the evidence base supporting the emerging LPR, and should be published as part of the consultation. The Local Transport Strategy should be undertaken in two parts – first, a comprehensive baseline providing an opportunity to test various patterns of development based upon the existing network (and potential interventions), and then the final Local Transport Strategy based upon the emerging Spatial Strategy.

Flood Risk

- 3.5 We agree with the measures set out in the consultation document. We note that this must accord with national flood risk policy – and as such, the reference that no built development should take place outside out Flood Zone 1 should be updated to reflect that the NPPF explicitly identifies the suitability of development based upon its level of vulnerability – and that development can take place within flood zones subject to the sequential and exception test.

Natural Capital

- 3.6 We support the aspirations set out in the consultation document – and recognise the multi-faceted benefits of enhancing existing, and delivering new Green and Blue Infrastructure. The document references an emerging Green and Blue Infrastructure Strategy; and this appears to form the basis of the maps included within the settlement specific topic papers, however, the document itself must be published as part of the evidence base supporting the LPR.

Zero Carbon Homes

- 3.7 Following the drafting of the consultation document, the Government have published its response to the consultation on the Future Homes Standard – with this confirming a two-stage approach to reach ‘carbon ready homes’ by 2025. The first stage in reaching this target has recently been published with draft Building Regulation changes at consultation.
- 3.8 The decision to take a two-stage approach, with zero carbon ready homes (a 75% reduction in carbon emissions) from 2025 is based upon the need to develop supply chains, skills and construction practices. In bringing forward local policies which differ from national standards, or are implemented earlier, it will be necessary to provide evidence on the feasibility, deliverability and financial cost of delivering these policy requirements.

Decentralised Energy

- 3.9 The delivery of decarbonised energy is intrinsically linked to the Future Homes Standard, and is also subject to separate legislative changes, for example the forthcoming gas boiler ban. It will be necessary to consider these in drafting the local policies.
- 3.10 The range of decarbonised energy production technologies available for new developments is wide, and constantly evolving. The most appropriate technology for any individual development will vary; for example, depending on the site specific characteristics, and the nature, scale and design of the development. We therefore suggest that the policy is flexible, and doesn’t set a particular preference in regard to which technologies are used.

Air Quality

- 3.11 We set out above our comments on the principle of development, sustainable pattern of development.
- 3.12 The Department for Transport undertook a consultation in 2019 which considered potential regulations for the installation of smart charging. This included indicative costs, which must be factored into the viability assessment, but it also recognised that there will be circumstances whereby the costs of charging provision will escalate due to the need for electrical capacity reinforcements; and that in these circumstances, there would be an exemption to the requirement to provide charging points. We suggest that the policy should specifically recognise such circumstances to avoid situations where development may be rendered unviable due to grid capacity constraints.
- 3.13 We support the intention of the Council to engage now with the network operators, and this will need to conform part of the Infrastructure Delivery Plan (IDP) supporting the LPR.

4. Chippenham

Brownfield Target

- 4.1 The target of 240 dwellings from brownfield between 2021-2031 is not supported. The 2019 Housing Trajectory indicates a current supply from small scale sites of just 66 units in the town; of which 57 are anticipated to be completed in the five year period to 2026. These are already included within the committed supply figure of 3,733 units; and as such, should be taken away from the brownfield target to avoid double counting. If a similar rate of delivery was secured in the second half of the plan period, then the brownfield target would be reduced by 183 units.

Preferred Strategy – Deliverability

- 4.2 The Preferred Strategy places significant reliance on the delivery of ‘two’ new suburbs (totalling 5,390 dwellings) – in practice, these are a single development site with significant inter-dependences; and it isn’t considered likely that either one can come forward significantly in advance of the other.
- 4.3 At the outset, it is necessary to demonstrate that the land is all available for development, and secondly, that there are appropriate measures in place to ensure that a coordinated approach to delivery will take place. For a development of this scale, with potentially significant numbers of landowners, it is going to be central to the delivery of the site and requirement infrastructure that there are appropriate mechanisms in place to manage the site’s detailed design and future delivery. This is going to result in a long-lead in, and a protracted planning application process.
- 4.4 In addition, the evidence base must demonstrate that the sites are deliverable without the proposed bypass. Whilst preliminary HIF approval has been given, this is not yet certain, and we anticipate being reliant on delivery of housing by a certain date (as is the case with other HIFs). Given the delays in bringing forward the LPR, and that it is not due for adoption until Q2023 at the earliest; it would seem that there is a significant risk that the HIF monies will no longer be available by the time the necessary planning permissions have been granted.
- 4.5 A detailed assessment of the deliverability of the Preferred Site must be undertaken – as per paragraph 72 of the NPPF: *“a realistic assessment of likely rates of delivery, given the lead-in times for large scale sites”*. We highlighted above our concerns that the selection of a single large scale strategic site would significantly undermine the deliverability of the LPR. Previous experience has illustrated how initial unrealistic delivery expectations have failed to be delivered in practice. The table below demonstrate four major sites – two of which are within Chippenham. The figures given in the left column are the expectations of delivery from the Authority’s AMR in 2015 – the year the Core Strategy was adopted, and the second column the most recent trajectory. None of these sites have delivered any housing to date; with each taking a number of additional years for lead-in, and then annual delivery rates at each site are below the original assumptions; in practice, we anticipate that at least a couple of these sites will slip back further in the plan period.

| | Ashton Park - 2,500 | | West of Warminster - 600 | | Rawlings Green - 650 | | Rowden Park - 1,000 | |
|---------|------------------------|------|-----------------------------|------|-------------------------|------|------------------------|------|
| | LPA | 2019 | LPA | 2019 | LPA | 2019 | LPA | 2019 |
| 2017/18 | 100 | | 90 | | | | 60 | |
| 2018/19 | 250 | | 125 | | 45 | | 150 | |
| 2019/20 | 250 | | 140 | | 80 | | 150 | |
| 2020/21 | 250 | | 145 | | 80 | | 150 | 10 |
| 2021/22 | 250 | | 145 | | 80 | | 150 | 50 |
| 2022/23 | 250 | | 140 | | 85 | | 150 | 70 |
| 2023/24 | 250 | | 115 | | 85 | | 150 | 70 |
| 2024/25 | 250 | 170 | | 138 | 85 | | 40 | 70 |
| 2025/26 | 250 | 225 | | 185 | 80 | 20 | | 70 |
| 2026/27 | 250 | ? | | ? | 80 | ? | | 70 |
| 2027/28 | 250 | ? | | ? | | ? | | 70 |
| 2028/29 | | ? | | ? | | ? | | 70 |
| 2029/30 | | ? | | ? | | ? | | 70 |
| 2030/31 | | ? | | ? | | ? | | 70 |
| 2031/32 | | ? | | ? | | ? | | 70 |
| 2032/33 | | ? | | ? | | ? | | 70 |
| 2033/34 | | ? | | ? | | ? | | 70 |
| 2034/35 | | ? | | ? | | ? | | 70 |
| 2035/36 | | ? | | ? | | ? | | 30 |
| 2036+ | | ? | | ? | | ? | | |

- 4.6 The residual requirement for Chippenham was identified as 5,100 dwellings: however this includes the delivery of all of Rawlings Green which as per the Authority's most recent trajectory is likely to be delivering post-2036.
- 4.7 In regard to the 'two' proposed sites, if we make an optimistic assumption that the planning applications would be submitted within 6 months of the adoption of the LPR in Q2 2023, and that they take c2 years to determine²; there would then be site disposal, reserved matter applications, discharge of conditions, and preparatory works. We would not anticipate the first dwelling being completed until at least 2027/28.
- 4.8 Assuming two outlets on each site, and taking the highest rate in Chippenham at Rowden Park; this would mean the combined sites of 5,390 dwellings would deliver circa 1,380 dwellings in the plan period.
- 4.9 This would leave a further requirement for 3,478 dwellings within Chippenham by 2036. It is therefore of significant importance that the LPR allocates additional sites to provide housing supply in the interim period.

Green and Blue Infrastructure

- 4.10 Without the full Green and Blue Infrastructure Strategy it is difficult to comment on the extract provided at Figure 11. We note that the base map is out of date, in particular around Corridors 4 and 10 which have been replaced by new built form – notably the development at Hunters Moon. We therefore assume that in moving to the next stage, that a full review of the baseline will be taken, and the GBI Strategy Plan updated as a result.

² Likely longer given the planning application period for strategic sites from the recent local plan.

Land off Saltersford Lane, Chippenham – Site 4 (803)

- 4.11 Waddeton Park submitted Site 4 (ref: 803) to the 2019 consultation on the LPR as an option for housing development.
- 4.12 The site is suitable, available and deliverable, and provides an opportunity to deliver housing in the short/medium term to assist the Authority in demonstrating a five year housing land supply in a highly sustainable location.

Sustainability Appraisal

- 4.13 We note that the Site scored favourably in the Authority's Sustainability Appraisal – ranking second out of the seven sites assessed.
- 4.14 The sustainability appraisal for site 4 is considered to be broadly accurate at this high level stage of assessment. We have the following additional comments to make:

| | |
|---|--|
| SA1 - Ecology | <p>A preliminary ecology report (dated February 2021) has been undertaken on the site, and this concludes that there were no significant ecology issues in regard to the site.</p> <p>We note the Sustainability Appraisal indicates that the site would require a <i>50m buffer strip for both the Pudding Brook watercourse and the railway corridor</i>. This is not supported by the findings of the ecology; whilst a buffer will be delivered, and net gain achieved, 50m is not a realistic assumption on the width of the buffer requirement.</p> <p>The assessment outcome could be raised from minor adverse effect to neutral</p> |
| SA2 - Efficient and Effective Use of Land | <p>The Assessment indicates that the adjacent land uses would reduce the number of dwellings delivered in this site. However the site will shortly be surrounded by residential development – to the west by Hunters Moon, and to the east (the other side of the railway) by Rowden Park. We do not consider that the adjacent land uses would be any determiner to the residential development of the site.</p> |
| SA4 - Climate change and vulnerability | <p>There is a small area of flood zone within the site – however this can be identified as green infrastructure. There remains significant land within the area to deliver a well planned residential scheme which in accordance with planning requirements, would deliver a reduction in greenfield rates, resulting in a local betterment.</p> <p>The site is sustainability located, and thus in principle will result in a reduction in carbon emissions through the sustainable travel choices being maximised. This differs from the Preferred Sites, which are significantly greater distances from the existing services/amenities of Chippenham, and are likely to result in people driving into the town centre.</p> |
| SA7 - Heritage | <p>It is unclear why the site's scores adverse in this respect; and should be updated to Neutral. The assessment concludes that there would be no significant effects on the closest listed building (Patterdown Farmhouse) – this is the opposite side of the railway and will shortly be surrounded by the Rowden Park urban extension.</p> <p>The Sustainability Appraisal also notes that the Site is unlikely to have any archaeological remains. This is supported by the 2005 planning consent on the site which was accompanied by an archaeological assessment.</p> |

| | |
|--|--|
| <p>SA11 - Reduce the Need to Travel and Promote Sustainable Travel</p> | <p>The site is in close proximity to employment, retail and health as confirmed in the Sustainability Appraisal.</p> <p>The Sustainability Appraisal indicates that primary school provision is at the upper 2km distance – however, we note that the Rowden Park Primary School under construction to the east will be within a 570m walking distance.</p> <p>The Hunters Moon site is delivering a new pedestrian/cycle link along Saltersford Lane, and a new pedestrian/cycle crossing over the A4 Bath Road. The site can tie directly into this provision.</p> |
|--|--|

4.15 The Site correctly passes through to the Stage 4 – Selection of Sites, on the basis of its high score in the Sustainability Appraisal and this is supported.

Stage 4 – Selection of Sites

4.16 Paragraph 64 appears to explain the reason why the site was not identified as a Preferred Option; with this explicitly recognising that whilst the Site is “more sustainable” than Sites 2 and 3 that they delivered more of the strategic priorities and as such, were taken forward ahead of the Site.

4.17 First, we note that the ‘sifting’ of sites is only required when there is not a need for additional housing sites. The Preferred Sites will not deliver sufficient housing to meet the residual needs of Chippenham over the plan period; and thus in accordance with the Sustainability Appraisal’s findings, Site 4 should also be identified for development now.

4.18 Notwithstanding this, we do not consider that the SWOT assessment for Place Shaping Priority 4 is a fair assessment for the site. The site is identified as having good accessibility within the Sustainability Appraisal and as with any development site, there will be opportunities for improvements to the local network of footpaths and cycleways. The site will be well placed to connect to the pedestrian/cycle improvements delivered for the Hunters Moon application. The SWOT assessment should be raised to neutral.

4.19 In regard to Place Shaping Priority 5, we note with concern that the locations most suitable for development shouldn’t be predicated on the delivery of a new bypass. The fact that the site will not result in a significant increase in congestion, and is well located to access employment and wider services/facilities via sustainable travel modes should be a positive. The fact that the site will not (either on site or via a s106 contribution) have to fund the delivery of a new road scheme should be considered a positive in light of the Authority’s climate emergency.

The Site

4.20 The site covers an area of approximately 5ha and abuts the established Chippenham settlement boundary. A copy of the Site Location Plan is attached. The site is presently low quality agricultural land. Access is provided by Saltersford Lane (B4528) to the west of the site which provides a vehicular, cycle and pedestrian route³ to the centre of Chippenham to the north and the A350 to the south.

³ Improvements to which are secured by the Hunters Moon Application under construction

- 4.21 To the north of the site is existing employment land – supporting a mix of retail and office development, and to the east is the railway, beyond which lies the Rowden Park development, which has secured a number of consents, and is now under construction. At the southern boundary of the site, there is a road under the railway; which provides access to Rowden Park and its proposed services and facilities; including the new primary school.
- 4.22 To the west of the site, is the consented Hunters Moon scheme, which secured planning approval in December 2017 for the construction of up to 450 dwellings, up to 2.41ha of employment land, alongside open space and associated works. The site is under construction, and some units are now occupied.
- 4.23 The Saltersford Lane site has previously been identified as a suitable location for development. In the North Wiltshire Local Plan 2011, it formed part of a strategic allocation for the extension of the Methuen Park Employment Site (BD1) alongside the now consented Hunters Moon site, and was included within the Chippenham settlement boundary as a result of that allocation. The Wiltshire Core Strategy undertook a review of extant employment allocations, and the site, alongside the wider area, was removed from the plan, but remained within the settlement boundary. The Chippenham Site Allocations Plan (CSAP) implemented a consistent approach to settlement boundary review – which snapped the boundaries tight to the settlement edge, and removed any land not developed, including allocations and sites with outline consent. The site was therefore removed from the settlement boundary, as was the Hunters Moon site.
- 4.24 Through the CSAP, the potential of the site to form an extension to the Hunters Moon site was confirmed. However, as the Hunters Moon scheme was considered as a ‘commitment’ for the purposes of the CSAP, it was not identified as a Strategic Site Allocation. Thus it was not considered acceptable at that time to ‘extend’ the Hunters Moon site through the allocation of Land at Saltersford Lane, as Hunters Moon was not a proposed allocation, and at that time had not secured consent⁴; thus there was a risk that the site could come forward in isolation should the Hunters Moon application fall away (see paragraphs 143-145, CSAP Inspectors Report 2017, and associated Statement of Common Ground⁵ No 16 dated 7 December 2016).
- 4.25 This concern has now been overcome – with the scheme consented and commenced. The site will therefore shortly be surrounded by development on all sides, and will have the benefit of the infrastructure being delivered as part of these strategic sites. The site represents an infill opportunity within what will be the built-up boundary of Chippenham.
- 4.26 The site presents a clear opportunity for allocation, or should the Authority not wish to allocate any additional sites at this stage, we suggest that the revised Development Boundary should capture the Hunters Moon and Rowden Park development; and thus the site would become subsumed into the Development Boundary.
- 4.27 The site could deliver 70/80 homes of a mix of types and tenures, and/or a care home.

⁴ The Hunters Moon consent was still subject to a s106 agreement at that time

⁵ Between Wiltshire Council and Strategic Land Partnerships (Waddeton Park)

Site Plan

Land at Saltersford Lane, Chippenham



North



Appendix 1 Site Location Plan

CHIPP292

Wiltshire Local Plan Review

Response on Behalf of Bloor Homes South
West – Land at West Chippenham

March 2021

Turley

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Client

Bloor Homes South West

Our reference

BLOA3036

9 March 2021

Executive Summary

1. This response has been prepared by **Turley** on behalf of **Bloor Homes South West** [“Bloor Homes”] in response to the **Wiltshire Local Plan Review** [“LPR”] consultation with respect to Bloor Homes interests at **West Chippenham**. This site is already known to the Council having been the subject of a previous ‘call for sites’ submission, and discussed at a meeting held with Officers.
2. It is essential that the plan period for the LPR is reviewed and extended, to be at least 15 years from the projected date of adoption for the plan, a plan period of at least 20 years would be preferable, given the scale of development to be provided within the plan.
3. The proposed Spatial Strategy which retains Chippenham as a Principal Settlement is supported, as Chippenham should clearly be a focus for sustainable growth over the plan period.
4. Care needs to be taken, in progressing a sound overall plan, to show how alternative Spatial Strategies for the County have been considered when formulating the plan.
5. Chippenham is very clearly a Principal Settlement within Wiltshire and at least the scale of growth proposed within the LPR is supported – Chippenham should be a focus for sustainable development given the scale and function of the existing settlement, and the opportunities available to accommodate new growth and development.
6. Robust evidence is required in respect of existing commitments in order to inform the LPR and any ‘residual’ quantum of new development to be planned for at the Town – this includes robust evidence of any ‘brownfield’ supply where sites do not already benefit from any planning permission for residential development.
7. It is not clear on what basis “access to the River Avon Valley” has been given prominence as a High Priority for the spatial strategy at Chippenham. Improved access and an improved GI network could be achieved in a number of ways and this specific factor should be tested via additional evidence as part of evolving the LPR.
8. The Spatial Strategy, and selection of Development Sites for Chippenham has been heavily informed by the ability to deliver substantial new road infrastructure alongside new development, whilst some of this infrastructure may be essential, there is not evidence to show that it is all necessary within the plan period, and there are alternative solutions/sites that are available without the need for substantial new strategic roads, and where access strategies based on active travel and public transport can be promoted.
9. It is appropriate for the spatial strategy for Chippenham to consider long term road infrastructure needs, including where these needs may extend beyond the plan period, although a balanced approach is required which accounts fully for deliverability and how a range of sites can contribute to the variety of strategic planning objectives for the town.

10. Deliverability of any selected site options is key. There is concern that reliance on only two very large strategic site options may risk continued under-delivery against planned growth targets, as can be seen in respect of sites already allocated within the Development Plan. Additional flexibility and resilience within the plan would be provided by a broader range of sites, and where these sites are not all reliant on the same (or similar) infrastructure interventions to be delivered – there is an opportunity to diversify the strategy to aid deliverability.
11. The West Chippenham site is available and suitable for residential led development, which can be brought forward without substantial new road infrastructure, and based on an access strategy which promotes active travel and public transport connections.
12. Additional evidence has been provided to illustrate the development opportunity which exists in this location, and address items of concern raised in the assessments that accompany the LPR in respect of access, flood risk and heritage impacts.
13. Whilst the A350 is perceived as a physical barrier to future growth to the West of the town, there is no reason why successful new pedestrian and cycle connections could not be made, enabling new development to be integrated, and providing new access routes into the countryside beyond for existing communities.
14. Beyond the perceived barrier presented by the A350, there are no substantive physical or environmental constraints that otherwise prevent the growth of the town to the West, and where sustainable new development within a landscaped setting can be achieved – meeting a variety of policy priorities.
15. We are keen to engage further with the Council as part of the preparation of the LPR in order that the merits of this site and location can be explored further, where development here could complement and add resilience to the strategy for sustainable new growth at Chippenham.

1. Introduction

- 1.1 This response has been prepared by **Turley** on behalf of **Bloor Homes South West** [“Bloor Homes”] in response to the **Wiltshire Local Plan Review** [“LPR”] consultation with respect to Bloor Homes interests at **West Chippenham**. Bloor Homes land interest at West Chippenham [“the Site”] is shown at **Figure 1** below. This site is already known to the Council having been the subject of a previous ‘call for sites’ submission, and discussed at a meeting held with Officers.



Figure 1 - West Chippenham location plan extract

- 1.2 Our response to the consultation is structured to firstly comment on the ‘Emerging Spatial Strategy’, which considers the County wide spatial strategy for the LPR. We then consider the ‘Planning for Chippenham’ consultation document which considers the role of Chippenham as part of the overall Spatial Strategy. Finally we set out further details of the development opportunity presented by the site, provide a Vision Document, and additional technical details and evidence to support the Council’s assessment of site options and the progression of the Local Plan Review.
- 1.3 We would welcome the opportunity to engage with the Council further in respect of the preparation of the Local Plan Review.

2. Emerging Spatial Strategy

- 2.1 We have considered the 'Emerging Spatial Strategy' document and supporting documents including the Local Housing Needs Assessment (ORS, April 2019), the Chippenham HMA: Formulating Alternative Development Strategies (ADSs) and Interim Sustainability Appraisal.
- 2.2 On review of the Council's online comment form it appears there is one key question formulated/posed for this document – *'Please enter any comments you have regarding the Emerging Spatial Strategy'*.
- 2.3 We have therefore considered the emerging spatial strategy and set out comments by relevant section in turn below. The context for our comments is found within the policy of the National Planning Policy Framework ["the Framework"], which states that for Plans to be considered sound they should be:
- a) Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
 - b) Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
 - c) Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
 - d) Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in this Framework.
- 2.4 We have considered the Emerging Spatial Strategy document with a view to highlighting where, in our opinion, there may be potential for compliance with the above tests of soundness with the draft Plan strategy. Our comments are therefore intended to maximise the future success of the LPR process by ensuring that the emerging plan, when scrutinised in later stages, is judged to be sound and provides a clear framework for future growth.

Growth and climate change

- 2.5 We generally support the objectives set out in relation to Carbon Neutrality by 2030 and recognise the potential role that the Bloor Homes site could play in delivering these outcomes. However when these objectives are carried through into LPR Policy, caution must be exercised on retaining deliverability and viability of the LPR allocations (and the plan as a whole), and ambitious local policy should not be significantly out of step with the climate and carbon requirements being set by national policy.

Delivering the spatial strategy

- 2.6 We generally support the spatial strategy delivery principles set out, and assume that the delivery principles are not intended to be presented in order of importance, as they are fundamentally interconnected in the way that they function – for example the need to allocate land for development to meet identified requirements is also a central part of ‘place shaping priorities’.
- 2.7 A further possible delivery principle might be to make clear that working closely with promoters and developers of the required large greenfield/strategic sites will form a key part of delivering the strategy. The intention being to explore and address deliverability issues in relation to infrastructure requirements, land ownership, housing density expectations and development viability. This will help to encourage effective delivery of the LPR strategy once adopted. Our general concerns about deliverability and the need for robust testing of this are also covered in subsequent parts of this LPR response.
- 2.8 We suggest removal of delivery principle (5) which appears to suggest that greenfield housing development will be restricted through phasing, to ‘ensure a priority is maintained on brownfield land’. Although we agree development of brownfield land should be encouraged, we do not consider that restricting other forms of development is a justified approach to take to delivering a spatial strategy. Taking the view that withholding deliverable, sustainable sites which are required to meet the full objectively assessed needs for the County would not amount to positive preparation of the LPR. It is important that the Council does not impose unnecessary constraints on allocated sites as that can result in adverse effects on deliverability.

Formulating the spatial strategy

Plan Period

- 2.9 The LPR Period is proposed as being up to 2036. We acknowledge that the 2036 figure is derived from the Strategic Housing Market Assessment and Functional Economic Market Area Assessments previously produced as part of the Plan evidence base, which both consider the requirement for new homes and jobs up to 2036.
- 2.10 Although we acknowledge there is efficiency for the Council in using the evidence base that has already been commissioned and produced, it must be fit for purpose to produce a positively prepared and effective Plan.
- 2.11 Fundamentally we caution against progressing the LPR with what we consider to be a relatively short plan period, and promote updating the relevant evidence base to allow adoption of a longer plan period for the LPR. This will allow the Council to plan for longer term strategic needs such as new infrastructure and large housing sites. The Framework states:

“22. Strategic policies should look ahead over a minimum 15 year period from adoption, to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure.” (our emphasis)

- 2.12 The Council's latest Local Development Scheme (July 2020) anticipates adoption of the LPR in Q2 2023, this would leave just 13 years from adoption to the expiry of the plan period, less than advised by the current, and emerging draft NPPF. On this basis the emerging LPR is not being positively prepared and is inconsistent with national policy.
- 2.13 In addition to this, the current consultation draft NPPF (January 2021)¹ adds wording to this paragraph to state:
- "Where larger-scale development such as new settlements form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery."* (our emphasis)
- 2.14 This is particularly relevant in Wiltshire where larger scale developments are proposed across the County and particularly at the Principal Settlements, including more than 1,800 homes for Trowbridge and over 5,000 homes at Chippenham. Given the scale of these developments it would seem prudent to allow for development to be delivered over a longer plan period.
- 2.15 We note that there are references within the consultation documents to strategic sites delivering a significant quantum of homes beyond the current plan period. It is critical for the preparation of the plan that there are clear and robust assessments of the likely (and expected) delivery from allocated site, so that there can be confidence that planned levels of growth and new development will be achieved.
- 2.16 We advise formulating the LPR for a period of at least 15 years from the possible adoption date to ensure soundness can be demonstrated as a minimum, however in the spirit of positive preparation, and given the scale of development proposed in Wiltshire, recommend formulating the LPR over a longer period such as to 2040 or beyond.

Alternative Strategies

- 2.17 The LPR has tested alternative development strategies within each HMA (which we come on to), and we acknowledge that the Council considers the LPR a review of the Core Strategy which has been the starting point for determining the distribution of growth. However, the Sustainability Appraisal, associated evidence base and resulting spatial strategy does not appear to have considered realistic alternative strategy options for the County. These could for example include; differing distributions of development between the HMAs; or a high distribution to Local Service Centres and Villages.
- 2.18 Whilst our client is generally supportive of the spatial strategy being proposed, our comments are raised in the interests of the Council ultimately securing a sound plan. Currently, it could be argued that we are not commenting on truly realistic alternative strategies for the County, but alternative distributions of development within HMAs which have been set largely by a pre-existing spatial strategy. For example, the Emerging Spatial Strategy document states:

¹ <https://www.gov.uk/government/consultations/national-planning-policy-framework-and-national-model-design-code-consultation-proposals>

“2.16 Needs vary around the County. There would not be a sustainable pattern of development if most building took place in the south of the county but most need was in the north.”

2.19 This statement is unsupported by the evidence base because the option hasn't been assessed. This approach may be argued as a flaw in the soundness of the preparation of the plan, particularly in considering whether the spatial strategy is justified, taking account of the reasonable alternatives.

2.20 The Framework states at paragraph 33:

“33. Policies in local plans and spatial development strategies should be reviewed to assess whether they need updating at least once every five years, and should then be updated as necessary. Reviews should be completed no later than five years from the adoption date of a plan, and should take into account changing circumstances affecting the area, or any relevant changes in national policy. Relevant strategic policies will need updating at least once every five years if their applicable local housing need figure has changed significantly; and they are likely to require earlier review if local housing need is expected to change significantly in the near future.” (Our emphasis)

2.21 Although the LPR is considered by the Council to be a 'review' of the Core Strategy, the review is occurring more than five years after the adoption of the CS, the LPR has its own evidence base including on housing and economic needs, and the CS plan period runs only up to 2026 so is very nearly completed. Furthermore, the LPR is being prepared under different national guidance (the 2018 NPPF and NPPG updates), with significant changes to the housing and economic evidence base (a new evidence base, which utilises a standard methodology for assessing housing need). In this regard, it can be argued the LPR is not a 'review' but essentially a new Plan for Wiltshire.

2.22 We recommend the evidence base is updated to include justification behind the formulation of the proposed spatial strategy, and clarifying that realistic alternative options have been considered in the preparation of the plan (this evidence may already exist but does not appear to form part of this consultation). This will ultimately assist in demonstrating compliance with the tests of the soundness at later stages.

2.23 We bring the Council's attention to the Inspectors' Letter (11 September 2019) on the West of England Joint Spatial Plan ('JSP') which following, among other issues, consideration of the sufficiency of the Councils' evidence to justify the chosen spatial strategy, the Inspectors' recommended returning to first principles and re-preparing the Plan. This ultimately led to withdrawal of the JSP and has caused significant delays in the preparation of up to date plans for the region. This example demonstrates the need to ensure that there is clear and demonstrable justification for the spatial strategy pursued, and that this should be clear at an early stage of the plan-making process.

Emerging Spatial Strategy for Chippenham Housing Market Area

2.24 Notwithstanding the comments above, we overwhelmingly support the continued retention of Chippenham as a Principal Settlement as it is a focus for existing homes

and jobs in the north of the County, has excellent transport links and potential for further sustainable growth.

- 2.25 Of the three alternative strategies for the Chippenham HMA, we generally support the hybrid approach taken by the Council which essentially adopts a high growth scenario for both settlements Melksham and Chippenham, blending scenario CH-B and CH-C. We consider this is logical given the findings of the Sustainability Appraisal, our understanding of the context and respective sustainability credentials of each settlement. A strategy which is focused on maximising development opportunities at Chippenham has clear merit and therefore this should be carried forward in future stages of the plan. The Council promoting a high level of growth at the most sustainable locations in the HMA, and where opportunity arises for accommodating an increased growth pattern (for example in accordance with planned infrastructure improvements at each settlement) amounts to positive preparation of the LPR.

Summary

- It is essential that the plan period for the LPR is reviewed and extended, to be at least 15 years from the projected date of adoption for the plan, a plan period of at least 20 years would be preferable, given the scale of development to be provided within the plan;
- The proposed Spatial Strategy which retains Chippenham as a Principal Settlement is supported, as Chippenham should clearly be a focus for sustainable growth over the plan period;
- Care needs to be taken, in progressing a sound overall plan, to show how alternative Spatial Strategies for the County have been considered when formulating the plan.

3. Planning for Chippenham

Scale of Growth

- 3.1 Chippenham is quite clearly a main (Principal) settlement within Wiltshire, it benefits from a critical mass of homes, jobs and services/amenities, and benefits from its location on key transport routes including the M4 motorway, mainline railway with connections to Swindon (and beyond) to the East, and Bath (and beyond) to the West (as well as other Wiltshire towns to the South), and is at the intersection of the key A4 and A350 road routes. There are significant opportunities to grow Chippenham further as a key town in the County, and the relative lack of environmental or policy constraints, as well as potential to significantly improve physical and social infrastructure make this a very realistic possibility. An ambitious level of growth is appropriate at Chippenham, which whilst proposed in the past has not always been delivered.
- 3.2 It is essential that the existing commitments that are relied on by the plan, and which inform the residual of 5,100 new homes to be identified by the plan to 2036, are robustly assessed and tested. Up to date evidence of availability and deliverability is required, particularly where the potential delivery trajectory for any existing 'committed' sites may extend beyond the plan period (2036). This available housing trajectory should be clearly presented as evidence alongside future versions of the plan.
- 3.3 Whilst development on previously developed (brownfield) land will form part of this strategy, care needs to be taken to ensure that any assumed capacity from this source is realistic and deliverable, and has accounted fully for other plan priorities, such as the retention of existing employment land.

Place Shaping Priorities

- 3.4 In general the Place Shaping Priorities identified for Chippenham are considered appropriate and would be supported, however the following comments are made:
- 3.5 **Priority i)** identifies that development is to provide new employment opportunities, with a strong emphasis on timely delivery so as to address net out-commuting within the town. The delivery of employment land and development as part of the Local Plan strategy for Chippenham is strongly supported; however this must be done in a way which supports and does not constrain essential housing delivery. Particular attention must be given to the delivery of the right types of employment land and development, in the right locations, to serve the various needs which will arise through the Plan Period. This may include some small scale employment provision as part of new mixed use development, although this will need to be complementary to larger format developments for offices, industry and logistics, and be devised to meet very specific needs as economic and employment trends will continue to evolve over the coming years, based on more flexible working patterns (including home working). The plan needs to be flexible, and responsive, to enable appropriate provision and to facilitate

appropriate economic growth for the County whilst complementing and not constraining housing growth at Chippenham.

- 3.6 **Priority iii)** relates to improved access to the River Avon valley through Chippenham as an important green infrastructure for the town. It is agreed that the River Avon is a significant and distinctive feature of Chippenham and generally support efforts to enhance this feature and access to it as a GI resource. However, there is concern around the extent to which this priority has informed the development strategy and the selection of preferred development sites. Access and other improvements to and around the river corridor should be possible irrespective of the location of substantial new built development, and that development, together with new road infrastructure will also have impacts on the priority GI areas which this priority seeks to address. A careful considered and balanced approach is required within the plan.
- 3.7 **Priority iv)** seeks the provision of a network of well-connected footpaths and cycle ways and connectivity for public transport. This ambition is supported and as set out within this response land at West Chippenham would be well placed to make a significant contribution to an improved network of pedestrian and cycle routes.
- 3.8 **Priority v)** relates to the linking of the A4 and A350 corridors. Whilst linking these key parts of the Strategic Road Network and providing relief to existing areas within the town centre may be suitable as part of the overall strategy for Chippenham, care needs to be taken to ensure that the relative merits and impacts of any associated development are fully assessed and understood, where there will be environmental impacts and costs associated with the development of significant new roads. As set out within the review document provided at Appendix 2:
- New strategic infrastructure will help to provide capacity to ‘unlock’ development in other locations at the town;
 - The ‘options assessments’ presented to consider new road alignment options identifies that large environmental costs will be borne by these developments;
 - Any funding shortfalls (above the £75million available via HIF) will require development contributions;
 - The developments proposed in association with the proposed road routes, will result in sub-optimal public transport solutions;
 - It is not certain that necessary high quality pedestrian and cycle infrastructure would be delivered alongside the proposed new roads, possibly risking isolated new communities.

Potential Development Sites

- 3.9 Three sites have been selected as preferred potential development sites, although these are effectively two options to the East and South of the town, within the Southern option comprising a combination of sites 2 and 3, linked by a shared new distributor road.
- 3.10 Both options are accompanied by Concept Plans which show how mixed use new neighbourhoods could be created, in both cases supported by new road infrastructure providing the A4/A350 links which are deemed to be necessary for the growth of the town. The review provided at **Appendix 2** includes comparison of the impact

assessment considered as part of the road Options Assessment, compared to infrastructure proposals that would be required for the delivery of the West of Chippenham site.

- 3.11 The text at 37-38 suggests that it is Eastern road which is considered most essential linking the A350 at the north of the town (from the M5) to the A4 in the East, ensuring traffic can bypass the town centre and other parts of the network through Chippenham. This route, through the North Chippenham development site, is that which has been anticipated through previous plan preparation processes. Paragraph 38 confirms that a further link road (the Southern route) is also likely to be required, but not certain. Clarity on the strategy for the town is essential as part of selecting the most robust site options, to ensure delivery of needed new homes and jobs during the plan period, as both roads are not fully funded by the HIF funds available, and otherwise development will be making this difference, possibly diverting funds from the provision of other obligations (such as affordable housing).
- 3.12 It is also the case that new development based on significant new road infrastructure will result in environmental effects that would not arise where existing road infrastructure can be used, and which can otherwise focus on active and public transport options, such as at West Chippenham. Whilst both road options and development to the East and South of the town may be appropriate in the longer term, realising the necessary delivery to 2036 from these locations is likely to be challenging and a robust and realistic trajectory will be needed in the plan to ensure no under-provision from the outset.
- 3.13 Each of the selected preferred options (Sites 1, 2 and 3) are scored strongly based on the ability to provide new infrastructure (primarily new roads) to help address congestion issues in and around the town. This is appropriate if these roads are essential but if evidence suggests that these roads are not essential, or are not required within this plan period then this broad strength would be overstated. Similar opportunities to provide (or contribute towards) new social infrastructure are likely to exist on all site options, alongside new GI areas and pedestrian/cycle infrastructure. As covered elsewhere Site 5 (West Chippenham) is well placed to link with and contribute to an improved public transport corridor on the A4 to the West of the town.

Deliverability

- 3.14 Deliverability and viability should be fundamental considerations for the assessment of sites as part of preparing the Local Plan. In this respect some care and caution should be taken where the provision for necessary growth at Chippenham over the plan period to 2036 (as currently defined) would rely on (effectively) only two large strategic sites (for 2,975 and some 2,600 respectively, when sites 2 and 3 are combined given the need for a shared distributor road).
- 3.15 Recent historic context is provided by the sites proposed and allocated for development within the Chippenham Site Allocations Plan (2017). This plan allocated two large strategic sites at Chippenham at **Rawlings Green** (650 homes) and **South West Chippenham** (1,400 homes total). Although large sites these were of lesser scale than those being proposed now within the Local Plan Review.

- 3.16 The adopted Chippenham Site Allocations Plan included at **Table 6.1** a delivery trajectory for these site allocations, suggesting that development would be commenced (first new homes delivered) in 2017/18 and 2018/19 respectively, with all development at Rawlings Green to be complete by 2024 and at South West Chippenham by 2029.
- 3.17 As it has transpired development has not been undertaken at all in accordance with this trajectory and delivery has been substantially delayed and is unlikely to be completed on either site by the end of the relevant plan period.
- **Rawlings Green** – has not been commenced and the latest published AMR suggested that development would only be commenced in 2025. A recently approved Outline Planning Permission for this site may improve this timescale, but delivery has been substantially delayed from that anticipated at the plan making stage;
 - **South West Chippenham** - Again the 2019 AMR suggested that for the sites comprised in the South West Chippenham allocation, development would only be commenced from 2020/21 and with a reduced annual delivery rate from that shown at Table 6.1 if the adopted plan. Whilst recent completions and projected trajectory data has not been published, it is likely that the completion of this development will be pushed significantly later than expected by the adopted plan.
- 3.18 Updated trajectories for these committed sites should be provided as evidence to support the emerging plan. The Council should also have regard to the significant delays experienced in bringing these sites forward, and consider how this would impact on the deliverability of the plan as a whole if either of the chosen main site options at Chippenham were to be similarly delayed, particularly where these developments are of a greater scale than the previous allocations, and are proposed to be delivered within additional substantial road infrastructure. Additional sites could help to spread any risk and mitigate the potential for under-delivery if one or both main site options were delayed for any reason, without relying on a review of the plan or planning applications only via the Development Management process. Additional detailed viability evidence should be provided for future stages to support the sites that are chosen (in whatever combination).

Summary

- Chippenham is very clearly a Principal Settlement within Wiltshire and at least the scale of growth proposed within the LPR is supported – Chippenham should be a focus for sustainable development given the scale and function of the existing settlement, and the opportunities available to accommodate new growth and development;
- Robust evidence is required in respect of existing commitments in order to inform the LPR and any ‘residual’ quantum of new development to be planned for at the Town – this includes robust evidence of any ‘brownfield’ supply where sites do not already benefit from any planning permission for residential development;

- It is not clear on what basis “access to the River Avon Valley” has been given prominence as a High Priority for the spatial strategy at Chippenham. Improved access and an improved GI network could be achieved in a number of ways and this specific factor should be tested via additional evidence as part of evolving the LPR;
- The Spatial Strategy, and selection of Development Sites for Chippenham has been heavily informed by the ability to deliver substantial new road infrastructure alongside new development, whilst some of this infrastructure may be essential, there is no evidence to show that it is all necessary within the plan period, and there are alternative solutions/sites that are available without the need for substantial new strategic roads, and where access strategies based on active travel and public transport can be promoted;
- It is appropriate for the spatial strategy for Chippenham to consider long term road infrastructure needs, including where these needs may extend beyond the plan period, although a balanced approach is required which accounts fully for deliverability and how a range of sites can contribute to the variety of strategic planning objectives for the town;
- Deliverability of any selected site options is key. There is concern that reliance on only two very large strategic site options may risk continued under-delivery against planned growth targets, as can be seen in respect of sites already allocated within the Development Plan. Additional flexibility and resilience within the plan would be provided by a broader range of sites, and where these sites are not all reliant on the same (or similar) infrastructure interventions to be delivered – there is an opportunity to diversify the strategy to aid deliverability.

4. Land at West Chippenham

- 4.1 The site (at West Chippenham) has been considered through the site selection process for the Local Plan Review, as 'Site 5' within the relevant assessments that accompany this consultation. It should however be noted that the assessed site extends beyond the land controlled by Bloor Homes, although it is not considered that this fundamentally alters consideration of any of the most relevant planning issues.
- 4.2 Whilst the Interim Sustainability Appraisal which accompanies the consultation suggests that Site 5 is the least sustainable when assessed against the alternatives, it is confirmed that there are no major adverse effects where mitigation is considered unachievable. The Stage 3 assessment of sites ranked Site 5 4th Joint, alongside other options which have been taken forward to be preferred as emerging proposed site allocations. It is suggested that Site 5 performs less well than alternatives in respect of various Place Shaping priorities, and the site is also scored down as a result of some perceived adverse effects. The responses summarised below seek to provide additional evidence to support the appropriate assessment of the site relative to alternatives.

A Vision for Land West of Chippenham

- 4.3 Enclosed at **Appendix 1** is a Vision Document which presents a Vision for the Site at West Chippenham, presenting a review of technical issues, opportunities and constraints, and a high level masterplan. This shows how a new community of some 1,400 new homes could be provided, with supporting local infrastructure, including a new Primary School, and also land available for a possible 'Sports Hub' (responding to evidence which has commented on the relative lack of these facilities on the Western side of the town).
- 4.4 The vision for the site is to provide a new sustainable community within the context of the existing urban area. The site is an exciting opportunity to deliver a new offer to the West of Chippenham. The design-led masterplan will provide a high quality residential community, design and landscape driven. There is opportunity for this site to provide an integrated green and blue infrastructure strategy and this has identified opportunities for ecological enhancements and climate change mitigation with woodland planting. Facilities to support this expansion area and the wider urban area can be included as potentially a new Primary School and Sports Hub. Walking loops connected to the wider footpath network within the site and connections to and from Chippenham's existing urban edge are included with viable solutions proposed for integration. There is also potential for a business and sustainable transport hub with park and change facility along the A4 Bath Road.
- 4.5 Whilst the A350 has consistently been seen as a barrier to development in this location, land on the western side of Chippenham is generally unconstrained and this location offers opportunities to deliver new development which is well connected to the existing urban area and other networks without the need for substantial new road infrastructure, which is already in place adjacent to the site. This will enable development to focus on other sustainable transport initiatives, where it is well placed

to link with the Bath Road public transport corridor, and enable delivery of affordable housing or other plan aspirations, without the risks associated with the significant infrastructure requirements at other sites that form part of the Council's preferred strategy. Land at West Chippenham can be considered alongside these other options as part of a more balanced overall distribution of development, which can help ensure delivery during the Local Plan Review plan period, and mitigate some of the risks which may be inherent in the very large sites that are preferred and which require significant new road infrastructure alongside new development.

Access Strategy

- 4.6 Throughout the LPR assessment of site options comment is made in respect of the potential severance provided by the A350 and consequent impacts for active travel options.
- 4.7 As identified within the emerging Vision for the site, an Access Strategy has been developed which identifies options for pedestrian and cycle connectivity. Six concepts demonstrate how access and connectivity can be achieved. These options will allow connectivity for pedestrians and cyclists to the facilities, amenities and employment opportunities which exist nearby to the site, as well as the town centre and other areas beyond via the wider networks which exist within the town. In the other direction these links would allow existing communities within the Western part of Chippenham to access the bridleway and PROW network which exists within the wider countryside to the West of the town, as well as access to new formal POS and other facilities which might be provided at the site.
- 4.8 A significant opportunity exists in this location to provide access to key employment sites at Bumpers Farm and other key employment locations on the western side of town, which will be more remote for the selected options to the North and South.
- 4.9 There is also a significant opportunity for the site to connect with the key public transport corridor along the A4 which provides connections into the town and to Corsham and Bath in the West. This includes potential to incorporate existing bus services into the development proposal in a way which will not dilute patronage of those existing services. Integration of public transport may include potential for an interchange point, and may build on the 'pocket park and ride' concept being explored by the Council with Bath and North East Somerset along this corridor. This ensure an active travel and public transport focus for the scheme, which meets numerous policy objectives and distinguishes this proposal from the other options being considered, despite all having good road access via either existing roads or the new road network being proposed as part of the Council's strategy.

Drainage and Flood Risk

- 4.10 An initial review of drainage and flood risk issues at the site has been prepared by Jubb and is appended to this response at **Appendix 3**. This specifically responds to the Stage 2 site selection assessment which has suggested that the site has medium flood risk, including recorded flood outlines and possible surface water risk.

- 4.11 The initial review of flood risk presented has considered a range of potential sources of flooding and historical flooding events have also been investigated. It has been confirmed that the full extents of the development will be located within Flood Zone 1 and therefore be at low risk of fluvial flooding. The risk of flooding from other sources including surface water, overland flows, groundwater and sewers is considered low.
- 4.12 The development proposals including the site drainage strategy will be designed in a manner that does not increase the risk of flooding to the site or the surrounding area.
- 4.13 Based on this review of flood risk to the site and the various factors considered, the overall risk of flooding to the development should be considered as low or can be suitably managed.
- 4.14 The site should not be considered less favourably than any others at Chippenham in respect of drainage of flood risk considerations. Groundwater source protection zones do not present a barrier to future development, given that this defined area covers much of the existing town of Chippenham.

Heritage

- 4.15 The Stage 2 and 3 site assessments presented with the consultation and also the Interim Sustainability Appraisal suggest that development at West Chippenham (Site 5) would result in significant impacts on designated heritage assets, primarily nearby listed buildings and the Registered Park at Corsham.
- 4.16 An Initial Heritage Appraisal has been prepared and is enclosed at **Appendix 4**. This appraisal has confirmed that the site does not contain any designated or non-designated built heritage assets (albeit such assets are present within Site 5 as assessed by the LPR documents). At the centre but outside the boundary of the Site is Chiverlins Farm (Grade II Listed). In the surrounding area are a number of other heritage assets with the potential to be affected:
- Mynte Farmhouse, Cartshed and Loft and Barn (Individually Grade II Listed)
 - Chequers Farmhouse (Grade II Listed)
 - Old Road Cottage (Grade II Listed)
 - Starveall Farmhouse and Barn Range (Individually Grade II Listed)
 - Stowells Farmhouse (Grade II Listed)
 - Sheldon Farmhouse (Grade II Listed)
 - Corsham Court Registered Park and Garden (Grade II*)
 - Medieval Settlement of Sheldon Scheduled Monument
- 4.17 The Site forms part of the wider rural or agricultural setting of these heritage assets. With the exception of Chiverlins Farmhouse, research has not identified any known historic or functional connections between the other heritage assets and the Site. A Zone of Theoretical Visibility (ZTV) has been produced based on the emerging proposals (assuming maximum height across the developable areas) with no mitigation measures. The ZTV confirms that without mitigation, limited views of built form could be experienced within the wider setting of the above heritage assets. These are all secondary views either from the assets or alongside them.

- 4.18 The introduction of additional mitigation measures in the form of new woodland, planting and landscape buffers would assist in screening any built form from these views. This has the ability to sustain the significance of the identified heritage assets.
- 4.19 Overall the assessment shows that the redevelopment of the Site has the potential to sustain the significance and setting of the majority of designated heritage assets within the surrounding area, subject to planting and height of built form. The proposals are likely to result in a degree of harm to the significance and setting of Chiverlins Farmhouse (Grade II listed) but this can be reduced through planting and an appropriate landscape buffer. The 'less than substantial' harm identified would need to be weighed in the wider planning balance.
- 4.20 The assessed harm as a result of this more detailed assessment and reflecting the emerging development proposals is not consistent with the significant or severe impacts assessed by the LPR documents, and the LPR should have regard to (and change) this going forward.

Summary

- The West Chippenham site is available and suitable for residential led development, which can be brought forward without substantial new road infrastructure, and based on an access strategy which promotes active travel and public transport connections;
- Additional evidence has been provided to illustrate the development opportunity which exists in this location, and address items of concern raised in the assessments that accompany the LPR in respect of access, flood risk and heritage impacts;
- Whilst the A350 is perceived as a physical barrier to future growth to the West of the town, there is no reason why successful new pedestrian and cycle connections could not be made, enabling new development to be integrated, and providing new access routes into the countryside beyond for existing communities.
- Beyond the perceived barrier presented by the A350, there are no substantive physical or environmental constraints that otherwise prevent the growth of the town to the West, and where sustainable new development within a landscaped setting can be achieved – meeting a variety of policy priorities;
- We are keen to engage further with the Council as part of the preparation of the LPR in order that the merits of this site and location can be explored further, where development here could complement and add resilience to the strategy for sustainable new growth at Chippenham.

Appendix 1: West Chippenham Vision Document

A VISION FOR

**LAND WEST OF
CHIPPENHAM**

Turley

Our vision for Land West of Chippenham is to provide high quality living in a green setting that connects with the existing western edge of Chippenham. The site has potential to offer a variety of housing to suit varying needs, a new primary school, a sports hub leisure facility, alongside an option for a business hub with park and change facility for cycle access to the centre of town, and A4 Bath Road public transport connections.

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Turley

Foreword

This Vision Document has been produced by Turley Design, in conjunction with Turley Planning, Landscape, and Heritage with a wider project team of environmental and technical consultants, on behalf of Bloor Homes. It refers to the future vision of land to the west of Chippenham.

Primarily based on desktop assessments, it sets out an indicative masterplan for the site, explains the principles behind its development and provides a vision for the overall progression and delivery of the proposal. The initial technical and design work that has been undertaken to inform the Vision Document has demonstrated that the land west of Chippenham is available, suitable and achievable for the scale of development proposed.

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Introduction

Concept & Vision

The vision for Land West of Chippenham is to provide a new sustainable community within the context of the existing area.

The site is an exciting opportunity to deliver a new offer to the West of Chippenham. The design-led masterplan will provide a high quality residential community, design and landscape driven. There is opportunity for this site to provide an integrated green and blue infrastructure strategy and we have identified opportunity for ecological enhancements and climate change mitigation with woodland planting, alongside a vision to deliver a new Primary School and Sports Hub. Walking loops connected to the wider footpath network within the site and connections to and from Chippenham's existing urban edge are included with viable solutions proposed for integration. There is also potential for a business and sustainable transport hub with park and change facility along the A4 Bath Road.



The Site

Site Location

The site is on the western edge of Chippenham between the A350 and A4 Bath Road. The site is 2 miles away from the centre of Chippenham and its centrally located train station. Bath is 12 miles to the west, Trowbridge to the south west is 14 miles and Swindon 22 miles to the north east all with good road and rail links. The site is strategically well connected via both major roads and public transport connections. The A350 runs along the eastern edge of the site providing direct access to the M4 corridor east and west.

Site Description

The site is 77ha in area, and is currently in use as agricultural fields and farm land. The site is bound to the east by the A350 which runs north towards the M4 and south to Trowbridge. To the south is the A4 Bath Road. The west and northern boundaries are adjoined by fields and track lanes that allow access to farms in the area. Towards the centre of the site area is Chiverlin's Farm which is outside the site area.

There is a Public Right of Way (PRoW) which crosses the site west to east which is picked up on the eastern side the A350 connecting with a network of paths into Chippenham. There is also a PRoW that also goes south towards the A4 Bath Road. There are watercourses that cross the site mainly in an east west direction with the most significant to the south which runs into Pudding Brook south of the A4.

Current access to the site is through informal farm gates and connecting fields. The town of Chippenham lies to the east with large residential areas bordering the eastern side of the A350 as well as a local centre to the south with retail uses and a Sainsburys store. Methuan Park to the south and Bumpers Farm to the north both provide a mix of employment uses off of the A350.

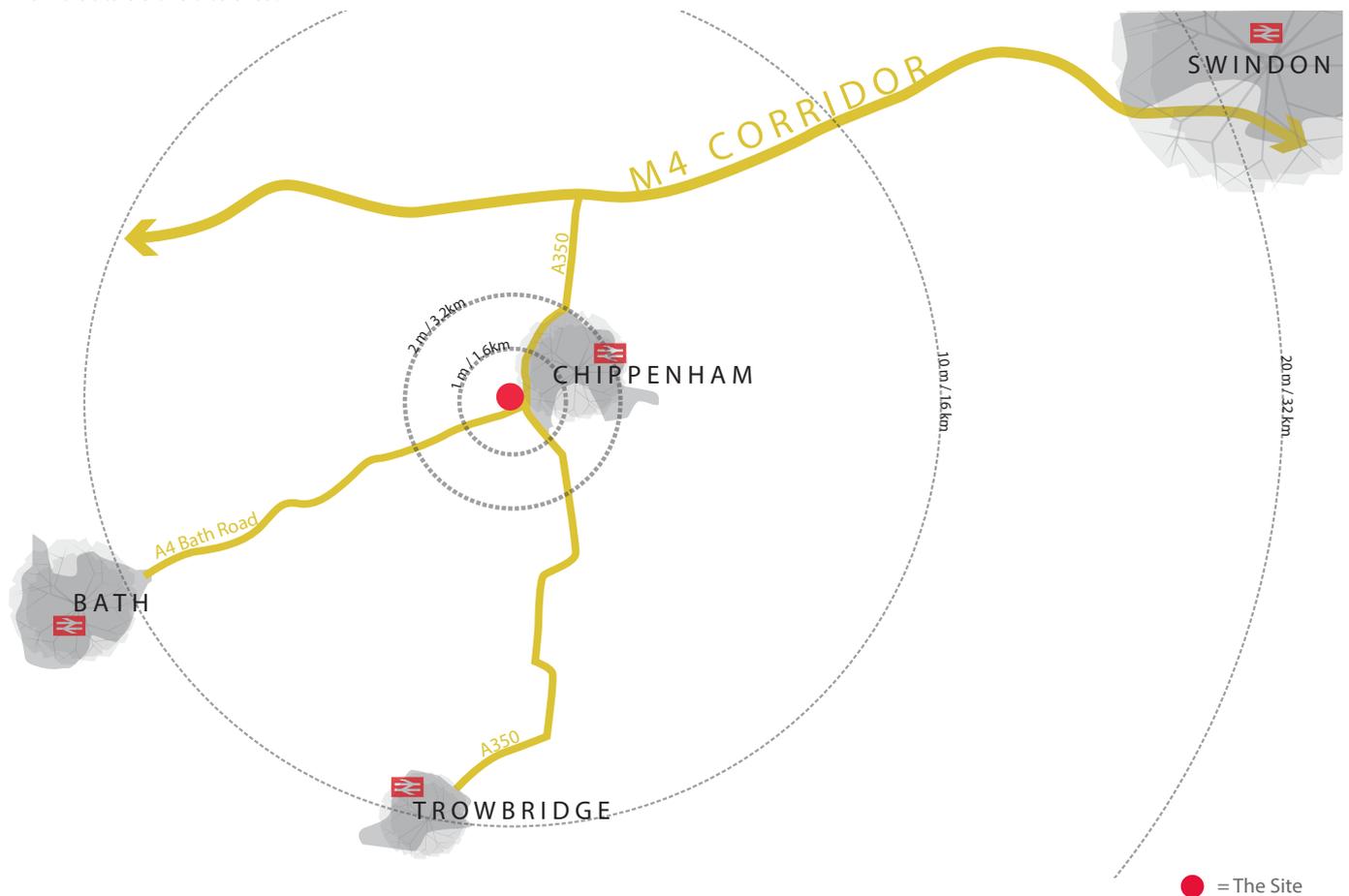


Fig.1. Site Location



Fig. 2. Site Aerial

Chippenham Lane

Frogwell

BUMPERS FARM

PRIORS COPSE

A350

VINCIENTS WOOD

Chiverlin's Farm

A350

CHIPPENHAM

Cep in Park South
roundabout Sandown Drive

Local Centre: Sainsbury's

Chequers
roundabout

METHUAN PARK

Chequer's Farm

A4 BATH ROAD

Pudding Brook

A350





Assessment



Planning Policy Context

Existing Planning Policy

Within the adopted Wiltshire Core Strategy Chippenham is identified as one of three Principle Settlements in the County, alongside Trowbridge and Salisbury. These towns and cities are strategically important centres identified to be a focus for development and growth.

The Chippenham Site Allocations DPD was adopted in May 2017 and identifies strategic sites to support the future growth of the town. These are as shown on the image opposite, together with other committed development. In order to meet needs in the most sustainable locations, and reflecting the status of Chippenham as a Principle Settlement within North Wiltshire, additional strategic sites will need to be identified at the town.

Emerging Planning Policy

The Council is preparing a Local Plan Review and it is expected that this will continue to identify Chippenham as a Principal Settlement and therefore that the town should be a primary focus for development, and will provide significant levels of jobs and homes. Emerging documents identify that the Chippenham HMA is forecast to have by far the largest additional housing need over the plan period.

Focusing new development at the County's main towns is expected to be most effective in ensuring development meets objectives for climate change mitigation and adaptation, and can also ensure that the benefits of infrastructure investment can be maximised.

A substantial quantum of new development at Chippenham will need to be identified for the emerging Plan Period, and it is essential that sites are selected which will meet the development needs by being deliverable for the quantum of development expected during the plan period. A range of sites may help to achieve this, so that (as has been the case in the past) delivery at a key Principal Settlement, with significant capacity for growth, is not delayed, where one or two key sites experience delay.

There is significant potential for land at West Chippenham to positively contribute to the emerging planning strategy for Wiltshire at Chippenham, where development at this site can play a key role in ensuring the timely delivery of a suitable quantum of development at the town – reflecting its role and function, and the contribution that can be made to various objectives by focusing substantial new development at this settlement.



Fig. 3. Site allocations plan ref: Wiltshire Local Development Framework, Adopted May 2017

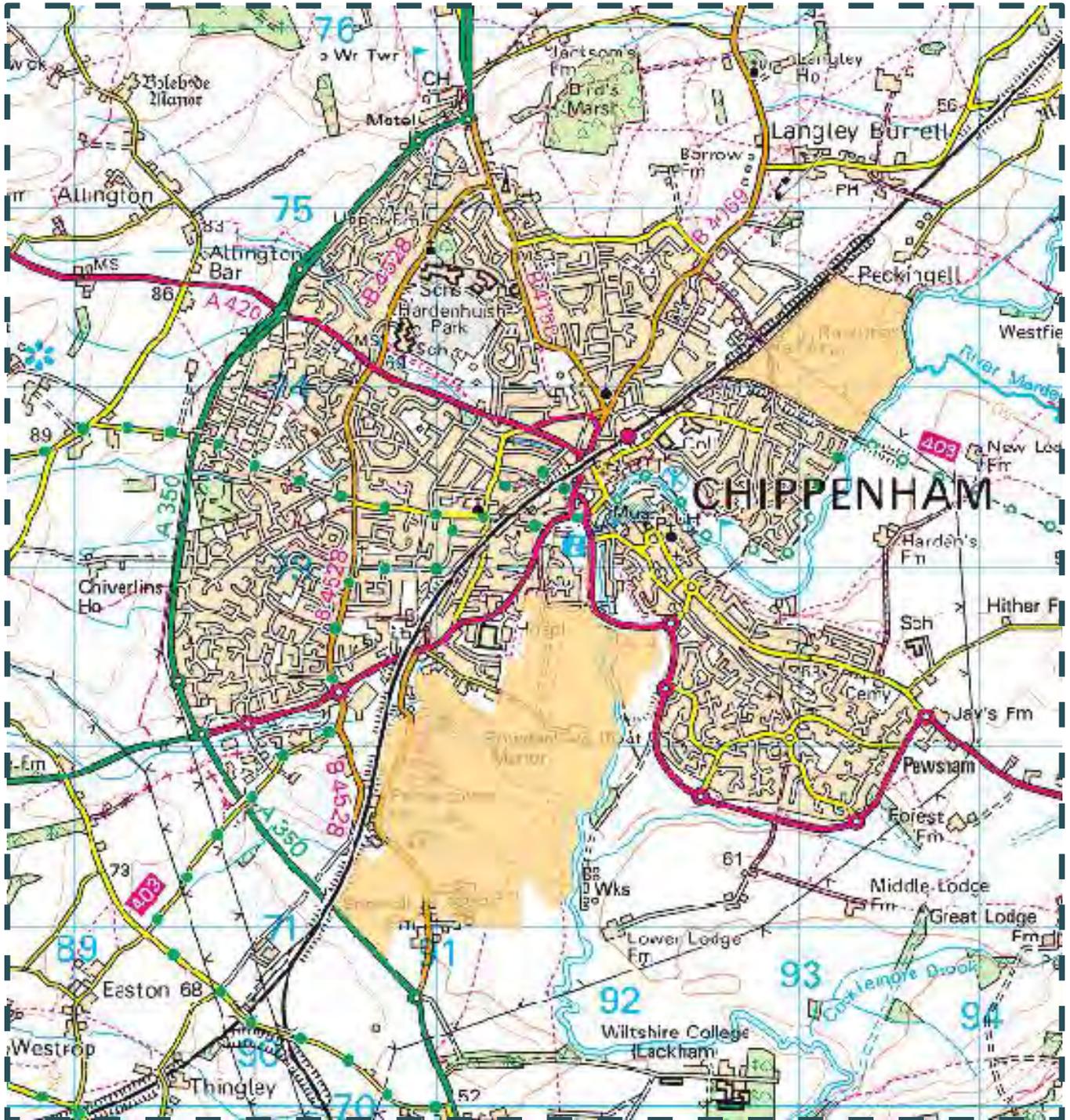


Fig. 4. Site allocations plan ref: Wiltshire Interactive Map, Adopted May 2017

Site Area Allocation CH1 and Country Park Proposed CH4

Movement Audit

Road

Both Bath and Swindon are connected to Chippenham along the M4. Bath also has a more direct route along the A4 Bath Road. Trowbridge also has a direct road link along the A350. Both of these roads border the Site. Junction 17 of the M4 can be reached from the Site within 8 minutes drive (5.4 miles). Further west along the M4 links to Bristol and South Wales and to the east Reading and London.

Rail

The nearest railway station to the site is Chippenham which operates on the Great Western Rail Line. It is situated between Bath Spa Station and Swindon. The average journey time from Chippenham to London Paddington is 1hr 17 minutes. The station is located in the centre of town and 7 minutes from the site (2.4 miles).

Trowbridge Train Station is 22 minutes (12 miles) from the site and operates along the Wessex Main Line. This provides direct trains to Bristol Temple Meads and Southampton.

Bus

The A4 Bath Road is an important existing bus corridor. There are bus stops located along the Bath Road adjoining the southern boundary of the site. Faresaver currently operate 3 routes accessible from the site: 10, X31, and X34.

The 10 operates between Chippenham and Corsham Town Centre.

The X31 operates from Chippenham Bus Station to Bath via Corsham and Box every 20-30 minutes throughout the day Monday to Friday with a reduced service on a Saturday and Sunday.

The X34 operates between Chippenham, Melksham, Trowbridge and Frome every half hour throughout the day Monday to Fridays with a reduced service on a Saturday and Sunday. The closest Bus Stop to the Site at Sainsburys. Its also provides a direct route to local amenities such as: Bus Station, train Station and Chippenham Hospital, Lackham Wiltshire College Campus.

B&NES are currently undertaking a study looking at an express bus service between Bath and Chippenham along the A4 which includes 'pocket' park and rides which has been considered as part of the site's strategy.

Footpaths / Cycling

The Site has two footpaths which currently cross it. The first goes from the A4 Bath Road south of the Site connecting to the second footpath which goes east to west across the site. To the west this path connects to an unnamed farm access lane, east of Chiverlins Farm. To the east the footpath comes out at the A350 opposite Drake Crescent. There is a footpath on the opposite side of the road which connects to the wider footpath network into Chippenham. Currently there is no formal crossing at this point.

Cycling access also provides connections into the centre of Chippenham with an existing cycle bridge crossing the A350.

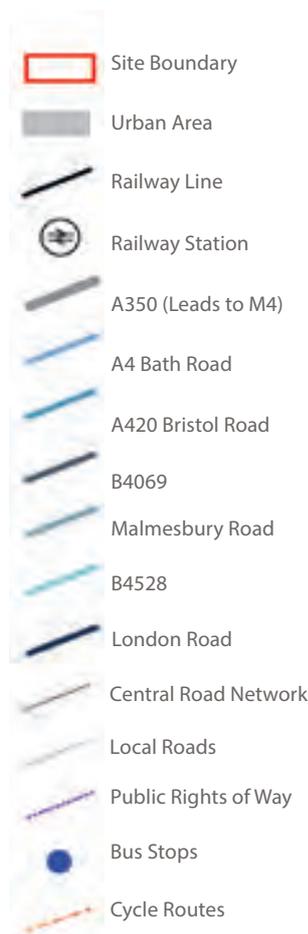


Fig. 5. Existing Movement Plan

Towards M4 Junction 17

In

A350

Malmesbury Road

BA069

Road

15 minute walk

10 minute walk

5 minute walk



Chippenham

A350

BA528

A4 Bath Road

London Road

A350

Transport Strategy

Clarkebond have undertaken an initial high-level feasibility study and transport review of the local area to determine how development could be supported.

Existing Highways / Access

The A350 is an important strategic route particularly given its role within the Western Gateway strategy as the key road link from the M4 to the south coast.

Transport Vision

Establish sustainable transport vision for the development in line with CIHT and TCPA best practice, considering the following elements:

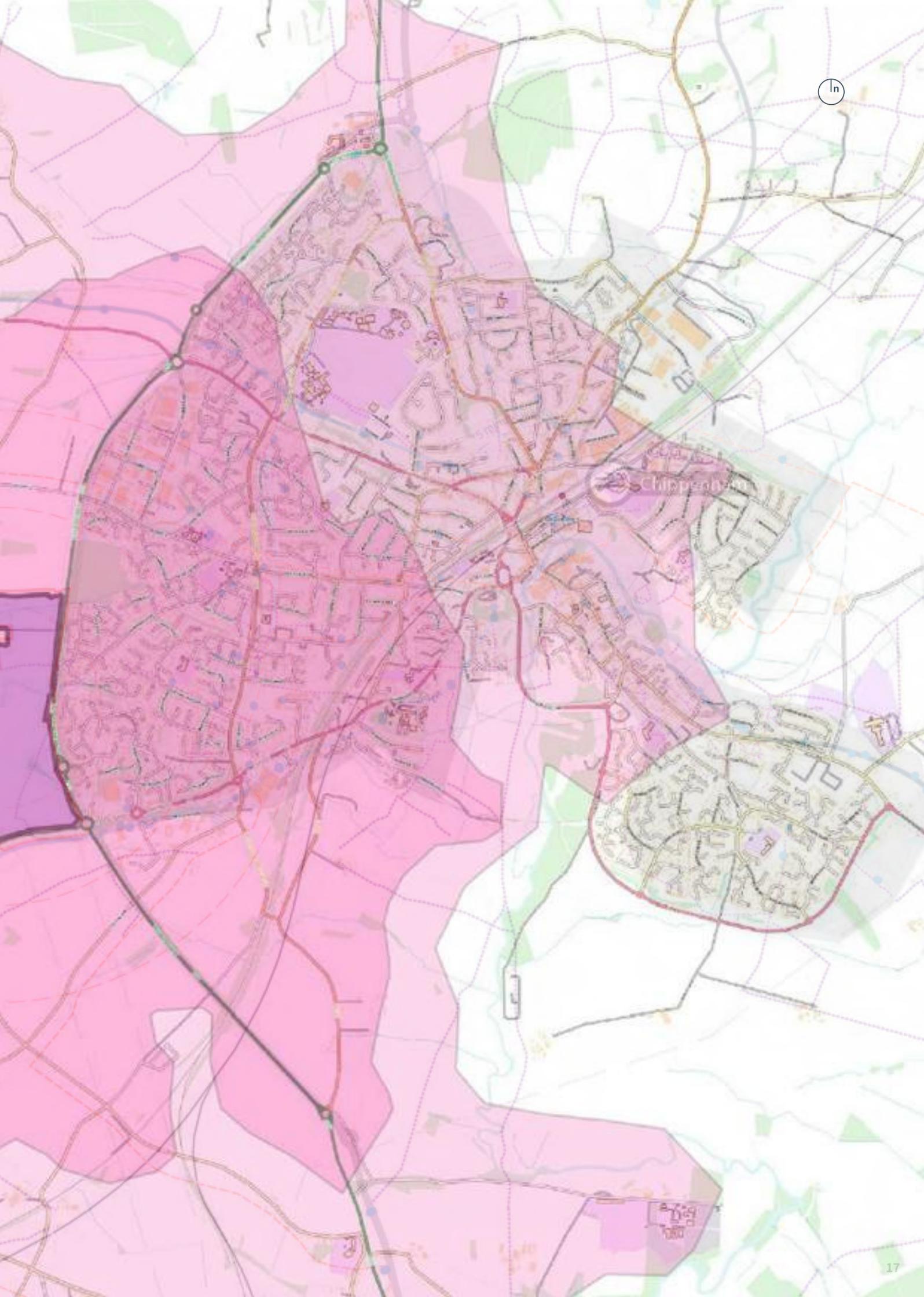
- Vision and validate approach to transport planning;
- Walking and cycling priority within masterplan;
- Public Transport, Cycling and Walking connections to key places;
- Mode Share targets – 50% sustainable modes;
- Mixed use to internalise trips (Education, Employment, Health, Leisure and Retail); and
- Home Working hub.

Highway Access Opportunities

- New access to A4 Bath Road for all modes;
- Access via improved A350/Drake Crescent left-in/left-out junction; and
- New A350 roundabout access (north of Drake Crescent junction)



Fig. 6. Cycling Isochrones



Walking & Cycling Distances

Pedestrian & Cyclist Opportunities

There are essentially three strategies for creating walking and cycling links across the A350:

1. Provide new footway/cycleway bridge/s over the A350;
2. Provide at grade signalised crossings at junctions with speed limit introduced on A350; or
3. Provide a combination of 1 and 2.

These options are explored further in the vision.

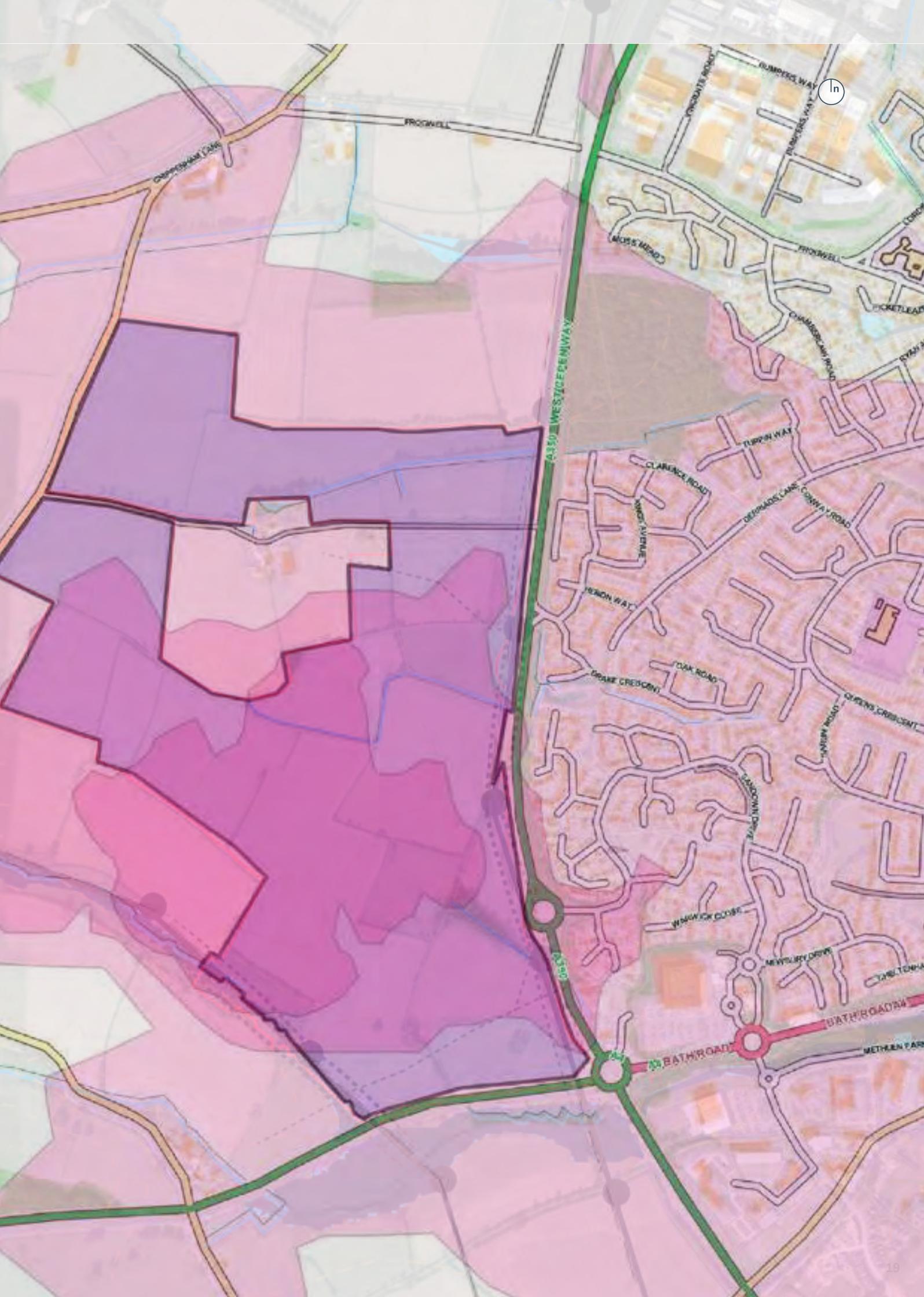
There is currently one ped / cycle bridge crossing the A350 north of the site which connects Frogwell with Bumpers Farm Employment / Industrial Estate. The site provides an opportunity to connect the existing western edge of Chippenham to the wider countryside and footpath links further to the west.

| Facility | Walking and Cycling Distances ¹ (metres) | Cycling Distances ² (metres) | Cycling Distances within 5km Threshold ³ (metres) |
|---------------------------------------|---|---|--|
| Public Transport | | | |
| Bus Stop – Sainsbury’s | 850 | | |
| Chippenham Rail Station | | | 3850 |
| Education | | | |
| Busy Bees Nursery | 850 | | |
| Queen’s Crescent School | 1850 | | |
| St Peter’s Academy | | 2250 | |
| Lords Mead Pre-school | | 2250 | |
| St Mary’s Catholic Primary School | | 2550 | |
| Redland Primary School | | 3050 | |
| Sheldon School (Secondary) | | | 3550 |
| Employment | | | |
| Bath Road Retail Park | 1200 | | |
| Bath Road Industrial Estate | 1750 | | |
| Bumper’s Farm Industrial Estate | | 2550 | |
| Health | | | |
| Chippenham Community Hospital | | 2650 | |
| Rowden Medical Partnership | | 2650 | |
| Leisure | | | |
| -Sport | | | |
| The North Wilts Indoor Bowls Club | 1850 | | |
| Sheldon Sports Hall | | | 3550 |
| Chippenham Town Football Club | | | 3650 |
| Chippenham Hockey Club | | | 3650 |
| Chippenham Sports Club Dome | | | 3650 |
| Chippenham Tennis Club | | | 3650 |
| Chippenham Cricket Club | | | 3650 |
| -Food & Drink | | | |
| McDonald’s Chippenham | 850 | | |
| Costa | 1200 | | |
| The Pheasant | 1450 | | |
| Rowden Arms | | 2050 | |
| The Fortune Inn | | 2250 | |
| The Kingfisher | | 2550 | |
| Sir Audley Arms | | 2950 | |
| -Other | | | |
| 3 rd Chippenham Scouts Hut | 1950 | | |
| Kingsley Road Community Hall | | 2350 | |
| Hungerdown Post Office | | 2850 | |
| Retail | | | |
| Sainsbury’s | 850 | | |
| Argos | 850 | | |
| M&S Foodhall | 1200 | | |
| TK Maxx | 1200 | | |
| Next | 1200 | | |
| Co-op Food | 1650 | | |
| Tesco Express | | 2150 | |
| Lidl | | 2850 | |

Notes: 1 - Walking and Cycling Distances (up to 2km shown), 2 - Cycling Distances (up to 3.2km shown), 3 - Key destinations within 5km cycling



Fig. 7. Walking Isochrones



In

Local Facilities

Chippenham is a well serviced town with a variety of sports, education, community, retail and employment offers. The site is in a key location to compliment these existing facilities ensuring good connectivity from new areas with existing Chippenham. The town centre is serviced with a main line train station with a good retail, leisure, museum and health practices centrally located. Chippenham Hospital to the west of the centre has a minor injury unit, care home and Rowden GP Surgery. Chippenham Sports Club to the south of Hardenhuish Park offers a covered sports dome, hockey club, tennis, and football facilities. Within walking distance of the site there are a range of facilities the site needs to deliver good connections with including the Sainsburys Local Centre and Vincient Woods.

- | | |
|--|--|
| 1 Chippenham Rugby Football Club | 26 Abbey Field School |
| 2 Allington Farm Shop | 27 Stanley Park Youth Football Club |
| 3 Garage (Texaco) | 28 Play Area |
| 4 Children's Pay Area | 29 St Mary's Catholic Primary School |
| 5 Hardenhuish Secondary School | 30 Chippenham Community Hospital |
| 6 St Nicholas' Church | 31 Garage (Esso) |
| 7 Hathaway Medical Centre | 32 Bath Road Industrial Estate |
| 8 Sheldon Sports Hall, School & Sixth Form | 33 Bath Road Retail Park |
| 9 Chippenham Sports Club | 34 Industrial Estate |
| 10 Cepen Park North, Morrisons Supermarket | 35 Butlers Hill Park & Garden |
| 11 Chippenham Ambulance Station | 36 Sainsburys Supermarket and Local Centre |
| 12 St Nicholas' Primary School | 37 Busy Bee's Children's Nursery |
| 13 Hathaway & Old College Dental Surgery | 38 Margaret's Meadow Park & Garden |
| 14 St Paul's Primary School | 39 Deriad's Pond Nature Reserve |
| 15 Monkton Park & Golf Course | 40 Queen's Crescent School |
| 16 Monkton Park Primary School | 41 Levi's Park |
| 17 Wiltshire College University Campus | 42 Children's Play Area |
| 18 Emery Gate Shopping Centre | 43 Vincients Wood |
| 19 Charter Primary School | 44 Frogwell Primary School |
| 20 Westmead Open Space | 45 St Peter's Academy School |
| 21 King's Lodge Community School | 46 Prior's Copse |
| 22 Pewsham Park | 47 Business & Employment Park |
| 23 Children's Community Centre | 48 Lords Mead Allotment |
| 24 Cricketts Lane Allotment | 49 Redland Primary School |
| 25 London Road Cemetery | 50 Corsham Court Park & Garden |



Fig. 8. Local Facilities Plan



-  Sport & Community
-  Education
-  Health
-  Parks & Green Spaces

Landscape & Visual Context

An initial landscape and visual appraisal of the site and its context has been undertaken by chartered landscape architects from Turley Landscape and LVIA.

Landscape Context

The Site is not covered by a landscape designation at either a national or local level and is at the lower end of the hierarchy of landscape value and landscape sensitivity (an area of higher landscape value and sensitivity lies to the west associated with the historic landscape of Corsham Park and the Cotswold AONB beyond).

Within the North Wiltshire Landscape Character Assessment, the Site is within the 'Hullavington Rolling Lowland' landscape character area. The main characteristics of this area are identified as:

- Rolling or lowland hills between 60-120m AOD, on Forest Marble limestone, Oxford Clay and Cornbrash
- Patchwork of irregular, medium sized fields, mainly pasture, and larger more recent enclosures used for arable, especially in on the richer soils.
- Continuous hedges with many mature oaks.
- Medium sized woodlands and deciduous copses.
- Fine stone villages with muted colours and dispersed farms.
- Historic Corsham Park.
- Use of undressed limestone to walls, ashlar quoins, lintels and mullions, and stone slates.
- Detractors of the M4, the edge of Chippenham and Hullavington airfield.

Key landscape features within and adjacent the site include: its undulating landform; strong network of hedgerows and hedgerow trees; high voltage power line and pylons; rural character of Sheldon Lane; pattern of small fields; valley and stream to the south marked by tree line; triangular tree copse; several significant individual trees (including two covered by a TPO) and two public bridleways.

The A350 and adjacent tree belt to the east currently forms a strong and well-defined settlement edge to the west side of Chippenham and the settlements of Cheltenham and Corsham currently have a clear sense of separation. Future development on the site would need to integrate with the existing settlement edge, form a positive frontage to the A350 and ensure the sense of separation from Corsham is maintained.

Visual Context

The site has a moderate level of visibility from the surrounding area due to surrounding mature vegetation, the built edge of Chippenham and variations in landform which provide some visual containment. Very few private residential properties have views across the site and views from the open countryside to the west are predominantly screened by landform and vegetation in the intervening area.

Key views into the site are from: A350; A4; bridle paths which crosses the site; Sheldon Lane and lane between Chequers and Biddestone. Views from the A4 are important gateway views on approach route to Chippenham from the west. (Southern boundary of site needs strong landscaped edge to maintain character of this approach.) Views from the A350 are also important and are experienced by large numbers of people.

From within the site, in higher parts on west side, there are attractive long distance views south and east to higher ground on the horizon.



Fig. 9. Landscape Considerations



Landscape Buffer

PRIORS COPSE

VINCIENTS WOOD

Queen's Crescent Primary School

Margaret's Meadow

Sainsburys Local Centre

A4 Bath Road

A350

A350

A350

In



Fig. 10. View north from byroad between Chequers Farm and Stowell Farm (glimpsed view of south-western edge of site beyond tree belt along stream)



Fig. 11. View west across site from A350 by roundabout junction with Sandown Drive



Fig. 12. View west across centre of site from A350 (close to junction with Drake Crescent)



Fig. 13. View north towards southern edge of site from A4 Bath Road



Fig. 14. Lane between Sheldon Corner and Stowell Farm (dense high hedges screen views towards the site)



Fig. 15. View south along A350 showing mature copse of trees on western side of site

Built Heritage Context

An initial heritage appraisal of the site and its heritage context has been undertaken by Turley Heritage and which has informed the proposals.

Built Heritage Context

The Site does not contain any designated or non-designated built heritage assets. At the centre but outside the boundary of the Site is Chiverlins Farm (Grade II Listed). In the surrounding area are a number of other heritage assets with the potential to be affected:

- Mynte Farmhouse, Cartshed and Loft and Barn (Individually Grade II Listed)
- Chequers Farmhouse (Grade II Listed)
- Old Road Cottage (Grade II Listed)
- Starveall Farmhouse and Barn Range (Individually Grade II Listed)
- Stowells Farmhouse (Grade II Listed)
- Sheldon Farmhouse (Grade II Listed)
- Corsham Court Registered Park and Garden (Grade II*)
- Medieval Settlement of Sheldon Scheduled Monument.

The Site forms part of the wider rural or agricultural setting of these heritage assets. With the exception of Chiverlins Farmhouse, research has not identified any known historic or functional connections between the other heritage assets and the Site. A Zone of Theoretical Visibility (ZTV) has been produced based on the emerging proposals (assuming maximum height across the developable areas) with no mitigation measures. The ZTV confirms that without mitigation, limited views of built form could be experienced within the wider setting of the above heritage assets. These are all secondary views either from the assets or alongside them.

The introduction of additional mitigation measures in the form of new woodland, planting and landscape buffers would assist in screening any built form from these views. This has the ability to sustain the significance of the identified heritage assets.

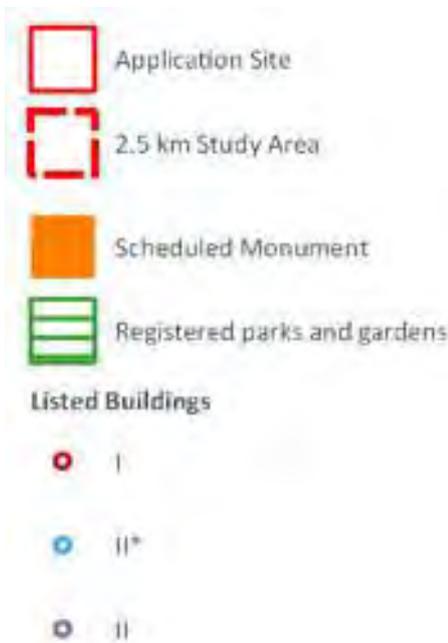
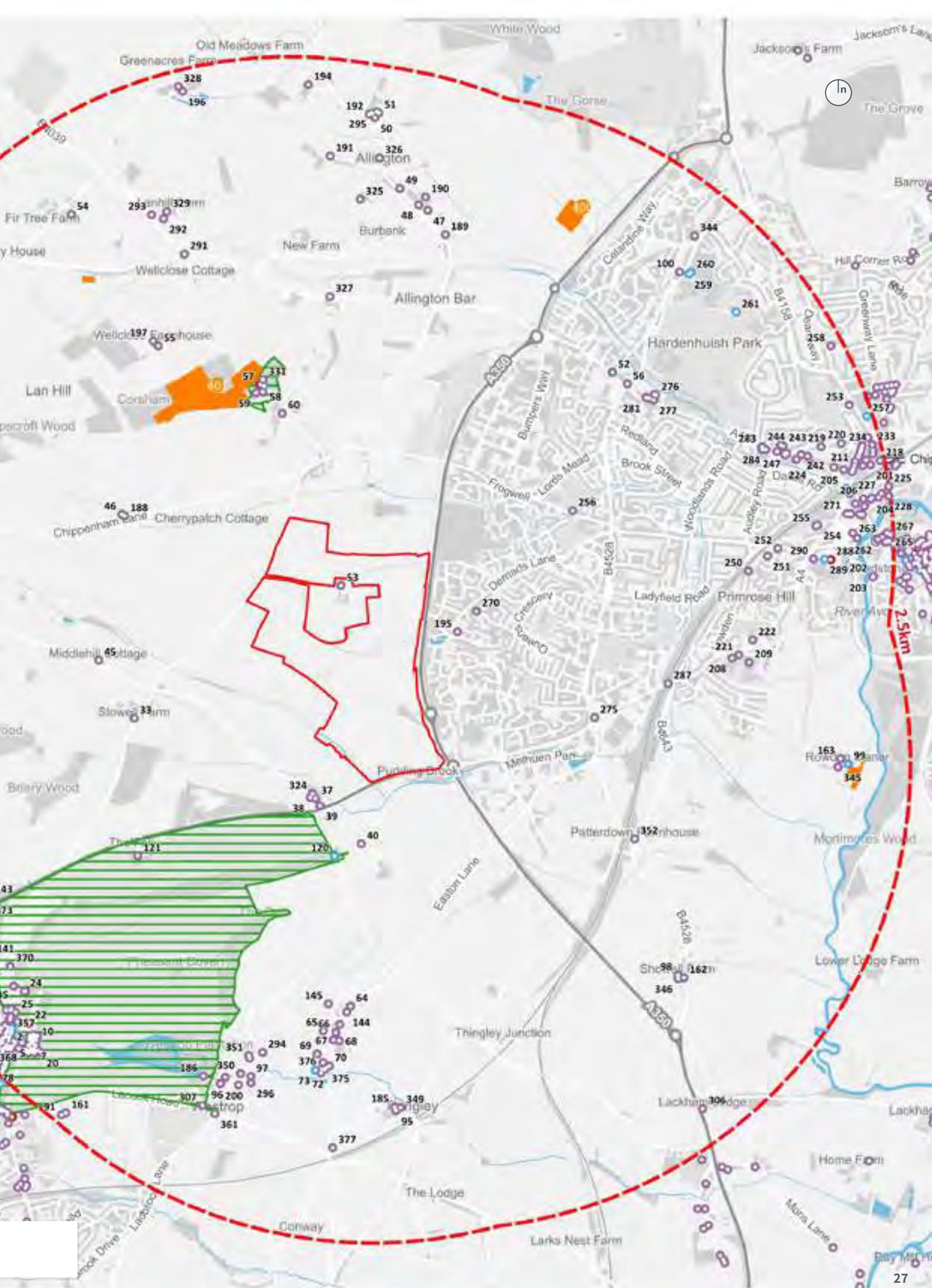


Fig. 16. Heritage Assets Plan



In

Topography, Utilities, Flooding & Drainage

Topography

This site slopes towards the south east. There is a valley that runs along the southern boundary of the site with a flood zone and water course located here. Ground levels are highest toward the north west towards the lane on the western boundary at 90-95 AOD. The lower part of the site to the east is 75-80 AOD along the A350.

Utilities

A utilities search has been undertaken in support of the proposal by Premier Energy. A key consideration of the site are the national grid power lines which run along the site's eastern and southern boundary. These have a sag and swing offset of 5.3m. An easement of 10.6 is recommended from development. There are also two lower voltage lines (11kv) which cross the site and these will be grounded is necessary. The site is well serviced by communication telecoms with lines within the A350 and A4 Bath Road, as well as an existing network for existing residents. There are Openreach lines up to parts of the site's boundary. There is an existing sewer network to the east of the A350.

Flooding and Drainage

There are three areas where surface water runs within the site along existing field boundaries and ditches. Along part of the site's southern boundary and to the southern side of the A4 Bath Road there is flooding mapped for zones 2 and 3. This is the lowest part of the site and along the existing valley.

Upgrade works to the existing sewer are expected to be required to serve a development of this size. This may require a capacity check and modelling of the network to be undertaken by Thames Water.

Surface Water

Surface water runoff from the proposed development should be managed in the following order of priority: rainwater re-use, infiltration to ground, controlled discharge to local watercourse, controlled discharge to surface water sewer and finally controlled discharge to combined sewer.



Fig. 17. Topo, Utilities, Drainage



A420 Bristol Road

A350

In

PRIORS COPSE

VINCIENTS WOOD

00153

00153

00153

A350

A4 Bath Road

A350

Highways and Access

Connecting the site to existing Chippenham is key. The following 6 concepts demonstrate how this is possible, with each option to be explored further as the site progresses. We aspire to have two vehicle access points and at least two pedestrian / cycle connections from the site to Chippenham. The view of the highway authorities will be crucial in agreeing the appropriate mix of measures moving forward as suggested in this vision document.

1. Existing Bridge

- Existing bridge north of the site connects over the A350 for pedestrians and cycles
- Connects Frogwell to employment area
- Potential to upgrade to green bridge and cycle route with landscaping and planting to improve green connections and route

2. New Roundabout

- Provide signalized at grade crossings for pedestrians and cyclists
- Multi modal access into the site with new roundabout providing a secondary access

3. Walking and Cycling Link - A350 / Drake Crescent

- Redesign A350/Drake's Crescent left in/left out junction to be signalized crossroads
- Access into development for pedestrians and cyclists and possibly buses
- Signalized at grade crossings for pedestrians and cyclists

4. Chequers Roundabout (A4 Bath Road)

- A new iconic cycle / pedestrian bridge over the roundabout
- Capacity Improvements / partial signalisation

5. New Access with Park and Change

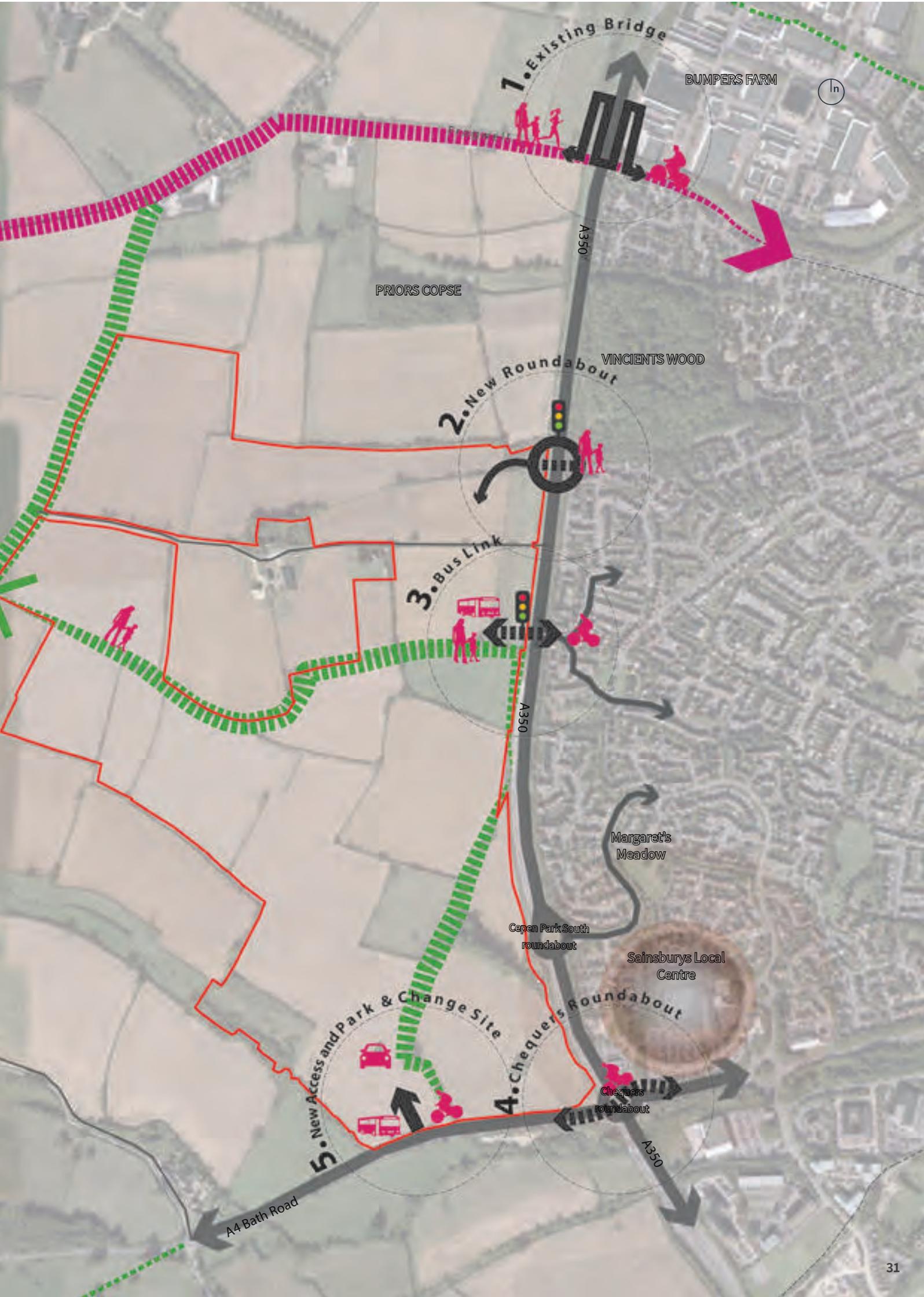
- Provide access into the site for all vehicles from the Bath Road with an right turn lane into the site
- Bus access from Bath Road providing Park and Ride service
- Operates both ways along the A4 to Chippenham centre and Bath City centre
- Park and Peddle into Chippenham
- Provide a bus link within the site

6. A350 Strategic Route Function

- The proposed development access strategy can deliver road safety improvements to the A350 corridor and improve journey time reliability through the use of speed limit reduction and signalization of junctions. The exact strategy would be agreed with the Highway Authority.



Fig. 18. Access Options



1. Existing Bridge

BUMPERS FARM

In

PRIORS COPSE

VINCIENTS WOOD

2. New Roundabout

3. Bus Link

Margaret's Meadow

Cepen Park South roundabout

Sainsburys Local Centre

5. New Access and park & Change Site

4. Chequers Roundabout

Chequers roundabout

A4 Bath Road

A350

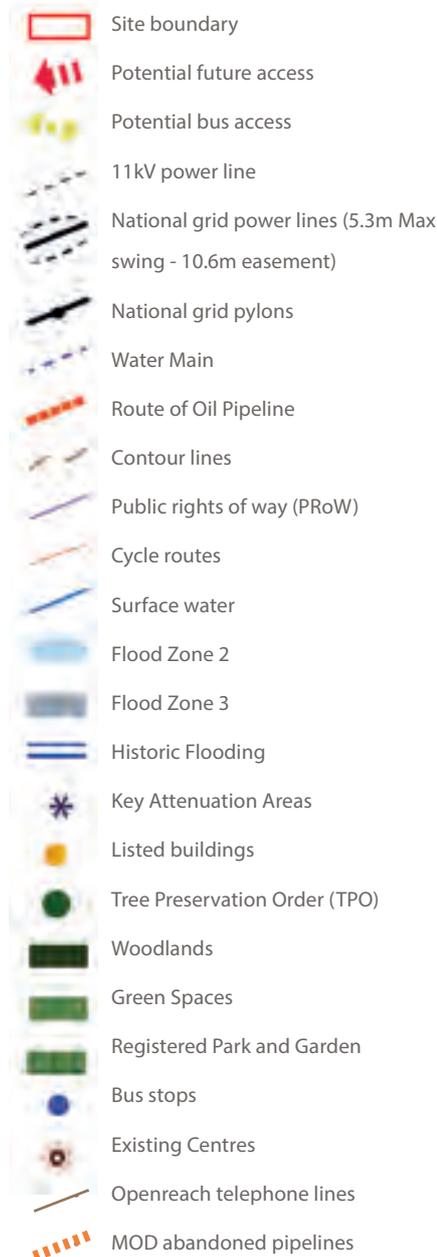
A350

A350

Key Design Considerations

A number of technical assessments have been undertaken identifying constraints and opportunities.

- The Site is to the west of the A350 which currently loops the western built edges of Chippenham. Parts of it have a mature tree belt screening the road.
- Potential future access will come off of the A350 and A4 with two access points being considered. Connections across the A350 are vital to ensure future development knits into the existing urban area.
- National grid power lines border the eastern boundary of the site between the site edge and A350. It has been assumed a 15m swing offset will be required at this stage. Another national grid power line crosses the site towards the western boundary. Lower voltage power lines cross parts of the site and it is thought these will be grounded at this stage.
- The site gradually rises to the north west with the lowest part of the site in the south east corner. There are watercourses that cross the site and flood zones 2 & 3 close the sites southern and western boundaries.
- Two PRoW cross the site and will be enhanced and retained where possible with further accessible connections.
- Chiverlins Farmhouse (Grade II Listed) is located outside the red line boundary but is proximate to the Site. There are also other heritage assets in the surrounding area (including Corsham Court and listed buildings at Mytne Farm). The significance and setting of these heritage assets should be taken into consideration as part of the scheme development.
- There are 2 TPO trees on site which are close to a natural valley and watercourse running through the site. This is an opportunity to make this a gateway green space.
- Green infrastructure should consider connections to surrounding green spaces and woodlands. Just south of the site Corsham Court is located which is a designated Park & Garden.
- Connections to existing facilities within Chippenham will need to be provided with potential for a bridge link across the A350.
- The proposed development area would need to allow a bus route to be created through the development and ensure emergency access requirements can be addressed.
- Most of Chippenham's urban area is within 5km cycle of the Site.



Listed Building Reference

- 1 Chiverlins Farmhouse Grade II Listed
- 2 Barn at Mynte Farmhouse Grade II Listed
- 3 Cart-shed & Loft at Mynte Farmhouse Grade II Listed
- 4 Mynte Farmhouse Grade II Listed
- 5 Chequers Farmhouse Grade II Listed
- 6 Sheldon Farmhouse Grade II Listed
- 7 Derriads & Wall Grade II Listed
- 8 Derriads Farmhouse Grade II Listed

Fig. 19. Site Considerations Plan



A420 Bristol Road

A350

BUMPERS FARM

In

PRIORS COPSE

VINCIENTS WOOD

A420

A420

A420

A350

7

8

Queen's Crescent Primary School

Margaret's Meadow

Sainsburys Local Centre

A4 Bath Road

A350

2
3
4
5





Masterplan & Vision

Design Principles

The following diagrams explore the overarching themes influencing future development of locating a new residential community at Chippenham.

1. Landscape enhancement and containment

- Historically Chippenham Forest covered this area and looking to reinstate woodland within the Site.
- Potential for woodland areas to be used for carbon offsetting.
- Development set back from the A4 Bath Road
- Provide a Green Corridor along the A350
- Retain and enhance existing green valley to the south of the site
- Provide effective landscape mitigation to screen views of built form within the setting of nearby heritage assets
- Retain existing PRoW as connecting green routes through the site



2. Access and connections

- Two vehicle access points are proposed connecting to the A350 and A4. This will form a looped access within the Site.
- Where possible access routes will respect the existing contours of the Site and run along these
- Existing PRoW will be retained with accessibility improved and new routes connecting to these.
- Green corridors will be formed along the routes of the existing power lines on site and will link into walking loops around the site accessing new green amenity spaces.
- Crossings are proposed between the Site and existing areas of Chippenham.
- A pedestrian and cycle crossing is proposed as part of an improved signaled Drake's Crescent junction. There is also the potential for bus access to the site.



3. Blue and Green Infrastructure

- There are three established surface water routes running across the site west to east. Where possible these will be retained and enhanced to respect the character of existing field boundaries and also protect & enhance ecological and biodiversity across the Site.
- Flood zones 2 & 3 run to the south of the site which is the lowest area. Primary attenuation corridor will be to the south and east of the site forming the development offset from the A4 and A350.
- Connections with existing green and blue corridors will be provided allowing for new amenity walking loops around the site.



4. Development Areas

Land uses that are being explored include:

- Residential areas set around new green infrastructure and woodland setting.
- Primary School
- Sports hub for use of existing and new residents.
- Employment complimenting existing facilities to the south west of Chippenham.
- Park and Change site providing direct bus and cycle links to the A4 / Chippenham
- The above uses to be centred around a local centre for future residents and users of the Site.



Masterplan Concept

The site provides an opportunity for around 1,403 new homes as well as new community uses and enhanced ecology, biodiversity and amenity green open space.

- 1 Significant open space created in the west of the site to form transition to the countryside
- 2 Key green corridors formed across site to retain existing public rights of way and hedgerows
- 3 Green infrastructure buffer to A350 to include various sports provision
- 4 Reinstating woodland planting
- 5 Opportunity for Park & Change site with direct access to the A4



Fig. 20. Design Concept

Wider Chippenham Vision

The site provides an opportunity for a vision for a wider strategic development for Chippenham for the next 30 years. New homes as well as new community uses and enhanced ecology, biodiversity and amenity green open space set around and complimenting the existing town. The strategic diagram opposite shows the site's wider context and possibility to provide a growth corridor north along the A350 with a clear landscaped edge to the west ensuring development is contained and connected to Chippenham with good pedestrian / cycle links across the A350.

Landscape Considerations

- Strong sense of settlement separation between Corsham and Chippenham needs to be maintained. Pull development edge away from A4 frontage and retain a strong green gap between the settlements.
- Pronounced undulating land form with valley and stream to the south marked by tree line. Valley feature should be retained and strengthened to form a green corridor along southern edge of development area and to form strong buffer between development edge, Corsham and cluster of listed buildings at Chequers.
- Green infrastructure on site should connect Priors Copse with Vincients Wood (nature reserve) on east side of A350 (partly ancient woodland) to form wildlife corridors and recreational route connecting to open countryside.
- Road on west side of site (Sheldon Lane) is narrow, enclosed by dense hedgerows and has strong rural character (important to maintain the character of this road)
- Within the North Wilts landscape Character Assessment, the Site is within the 'Hullavington Rolling Lowland' landscape character area.

The management guidelines for the area are:

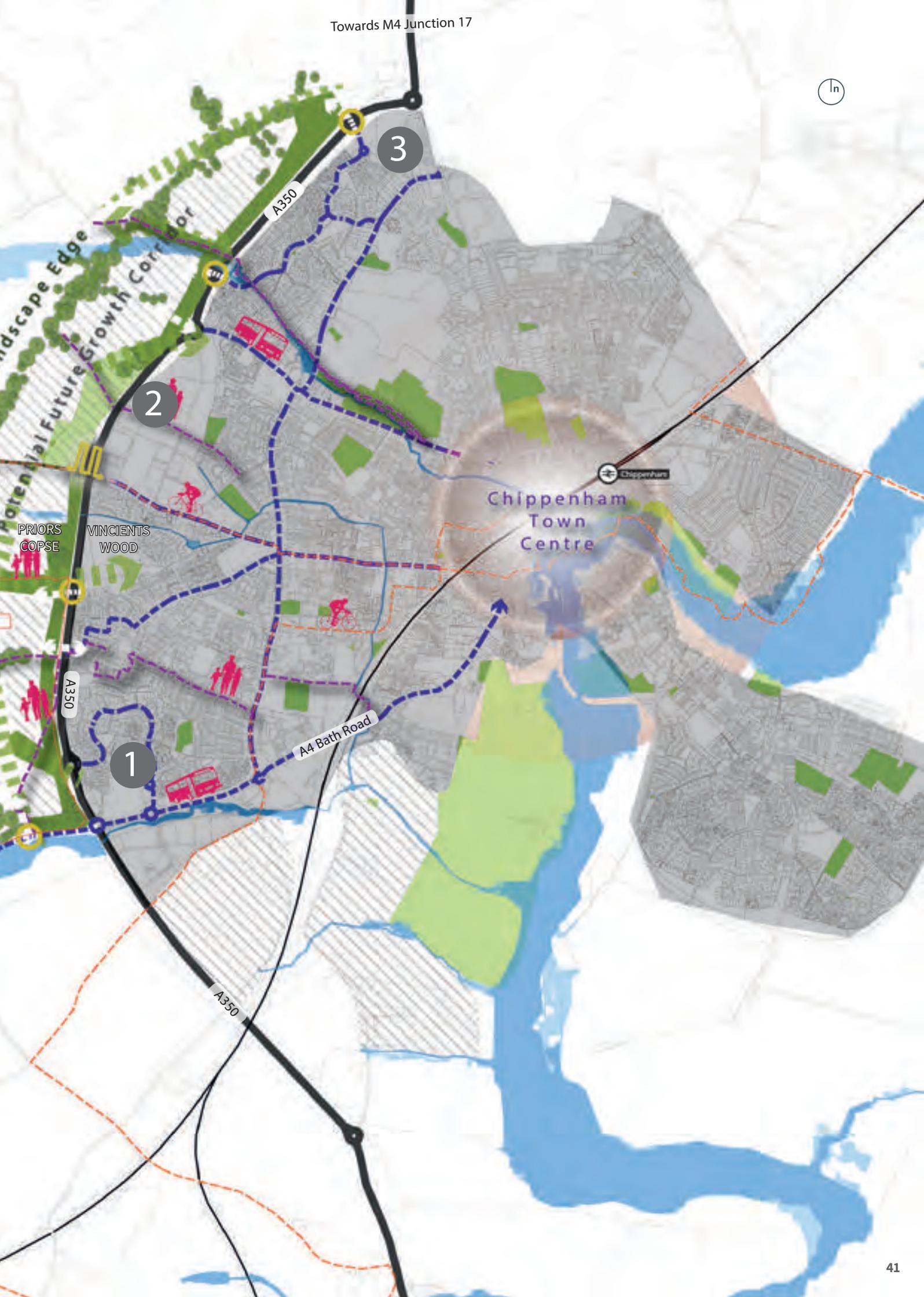
- Conserve and enhance its pastoral character, and to ensure that any new development respects the grain of the dispersed settlement in the area and the vernacular building materials.
- Preserve and enhance the continuity of hedgerows and mature oak trees
- River valleys should be enhanced by encouraging habitat creation and planting of riverside trees.
- Protect the setting and intrinsic character of Corsham Park.
- Minimise the landscape and visual effects of the expansion of Chippenham.

Landscape Enhancement and Containment

- Historically, Chippenham Forest covered this area. Proposals would look to reinstate woodland within parts of the Site including within the western Site boundary with green and ecological links to Priors Copse, Vincients Wood and other green links. This will also provide a screen and landscape buffer to future development.
- Potential for new woodland areas to be used for carbon offsetting.
- Existing tree belts, tree clumps and hedgerows to be retained where possible and integrated within development areas
- Three green crossings across the A350 for pedestrians and cycles.
- Development set back from the A4 Bath Road to main sense of separation when travelling between Corsham and Chippenham
- Green Corridor to be provided along the A350
- Existing green valley to the south of the site to be retained and enhanced as green corridor.



Fig. 21. Wider Vision



Proposed Masterplan

This Site provides the opportunity to vision a new complimentary community for Chippenham.

Development West of Chippenham will provide local benefits including the delivery of market and affordable homes, and provision of new high quality open space with a sports and primary school hub. The following diagram sets out a concept for this.

- 1 Significant open space to the west of the Site creating a landscape buffer and woodland setting with healthy living areas to include orchards and allotments
- 2 Key green and blue corridors formed to retain and protect hedgerows and ecological enhancements
- 3 Landscaped corridor along the A350 to offset development and provide a linear park & sports activities considering safe offset from power lines and buffering noise from the A350
- 4 A local centre and community / sports hub offering a key building at the southern gateway to the Site
- 5 Pedestrian / cycle access from A350 and A4.
- 6 Development offset from Chiverlin Farmhouse, retaining areas of open space and introduction appropriate landscaping/buffering
- 7 School and sports hub facilities located along the primary access road providing active uses along the route that are visible and accessible from the A350 (a) 2 Form Primary School (b) Central Sports Hub. This forms a central focus for development west of the A350.
- 8 Offset development from the A4 with landscaped valley
- 9 Introduction of landscaping and planting to screen views from heritage assets to the south including Mytne Farm and Corsham Court Registered Park and Garden
- 10 Introduction of landscaping and planting to screen views from heritage assets to the west and north west including Medieval Settlement at Sheldon Scheduled Monument and Sheldon Farmhouse
- 11 New access from A4 for vehicles, pedestrian and cyclists with a Park and Change site with car and cycle parking.



Fig. 22. Masterplan Strategy



A420 Bristol Road

BUMPERS FARM

In

PRIORS COPSE

VINCIENTS WOOD

Queen's Crescent Primary School

Margaret's Meadow

Sainsburys Local Centre

Corsham Court Park & Green Designation

10

1

2

10

2

3

10

1

6

7

(a)

5

A350

4

3

9

2

7

(b)

9

3

9

8

11

2

A4 Bath Road

2

5

A350

Land Budget

A site strategically placed between the A4 and A350 offering sustainable alternative transport links alongside business hub area, a new leisure offer for the town, and residential led community.

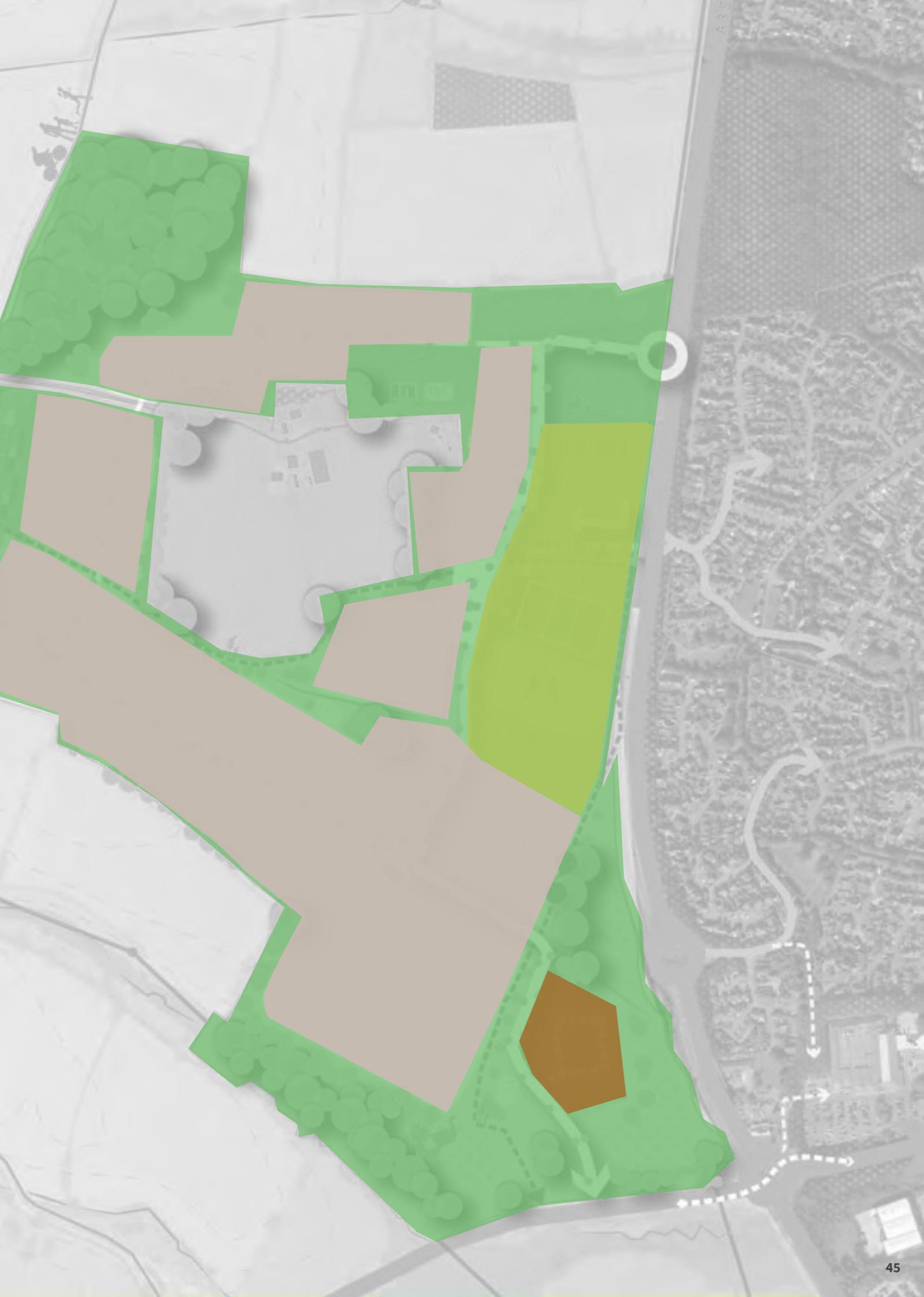
The proposals have been based on the following land uses with areas associated set out in the table below. This is indicative at this stage and will require further technical input and market testing.

| | | |
|--------------------------------------|---------------------------------|---|
| Residential Areas | 35.08 ha (1,403 homes at 40dph) | Range of residential areas offering a mix of house types and tenures within differing character areas responding to site context and future uses. |
| Sports and Primary School Hub | 7.0ha | <p>A 2FE primary school situated to the eastern edge of the site allowing accessibility for existing and future residents.</p> <p>A primary school with 2FE would usually take up 2.2ha. This allows a further 4.8ha to create a community sports hub. The illustrative masterplan shows this as having a local centre / leisure key building towards the centre of the site. Sport provision could include:</p> <ul style="list-style-type: none"> • Athletics track and facilities • Range of Sports pitches - junior through to adult • Tennis courts • Bowls club and green |
| Park & Change / Business Area | 1.64 ha | Within the south east corner of the site with direct access to the A4 a bus link with parking facilities for cycles and cars is proposed. Small scale business uses could also be developed in this area. |
| Infrastructure and Other Development | 36.5 ha | Western landscape buffer with new woodland planting, open space, attenuation, offset areas for power lines, road infrastructure, green links, allotments and orchards |

-  Residential Areas
-  Sports & Primary School Education Hub
-  Park & Change / Ride Scheme with Business Hub
-  Infrastructure and Other Development



Fig. 23. Land Areas



Masterplan Strategies

Land Use

The proposals are for a community led residential scheme, set within a landscaped areas with woodland planting. The site will have 4 key land use areas:

- Residential
- Primary School / Sports Hub
- Park & Change / Business
- Landscaping



Residential Density & Building Height

Higher density will be applied at the centre of the residential areas and towards the south. Lower density will be used as a transitional edge between development and open space. Development will vary in scale but generally be between 1 - 3 storeys.

- Residential: Higher density (Up to 35-45dph / 3 storeys)
- Residential: Lower Density (circa 30-35dph / 2 storeys)
- Community building (up to 3 storey)
- Primary School & Sports (up to 2 storey)
- Business Area (up to 2 storey)



Green & Blue Infrastructure

- 1 A key area for landscaping is the western edge where woodland planting is proposed to reflect the areas historical context as part of Chippenham's Forest.
- 2 This edge will soften the existing western development edge of Chippenham as well as provide opportunities for carbon offsetting, and varied green amenity space.
- 3 Allotments and a community orchard are proposed which will be part of the healthy living agenda.
- 4 Green links and rights of way will be retained and enhanced where possible.
- 5 Planting around the development edges will provide a green setting as well as street trees and planting along key routes.
- 6 Incidental spaces and parks will also be placed within residential areas.
- 7 Drainage is focused within the southern valley of the site and eastern edge.
- 8 The sport hub will provide a green buffer between the A350 and residential development.



Access

The primary route will provide an internal loop with a southern and northern site gateway connecting to the A350 and A4. A secondary loop will be provided through the residential areas. A hierarchy of streets will be implemented to provide street character and ensure pedestrians and cyclists have priority where necessary.

Key pedestrian footpaths will link into the existing PRow network and provide further connections to the existing community.

A bus only access point is also possible connecting the A4 into the site, and existing bus routes to Chippenham from the A350 opposite Drake Crescent .

-  Primary Access Loop
-  Secondary Access Loop
-  Internal Access Streets
-  Key Pedestrian / Cycle Green Routes
-  Pedestrian / cycle Streets
-  Bus Access (with cycle / pedestrian routes)



Character Areas

Local Centre & Community Leisure Vision

A new local centre to include a gateway building on the southern access primary route. This should be visible from the A350 and will be situated to the eastern side of the site. This will provide a focus to the proposed development west of the A350 and centred around a higher density development core, which could also include a mix of other leisure and community uses.





- 1 Local Centre
- 2 Opportunity for community sports facilities
- 3 Existing right of way set in green setting
- 4 Tree lined primary route
- 5 Bus & Cycle / Ped Link

Character Areas

Sports Hub & Primary School Vision

A new 2 Form Entry Primary School will be situated to the north east of the site. This will provide a focus to the northern gateway / access from the A350. The school can provide a wider range of services including extended uses of the hall and sports ground to facilitate the wider community. The larger sports hub area has 7ha of land to be used for wider community sport uses.



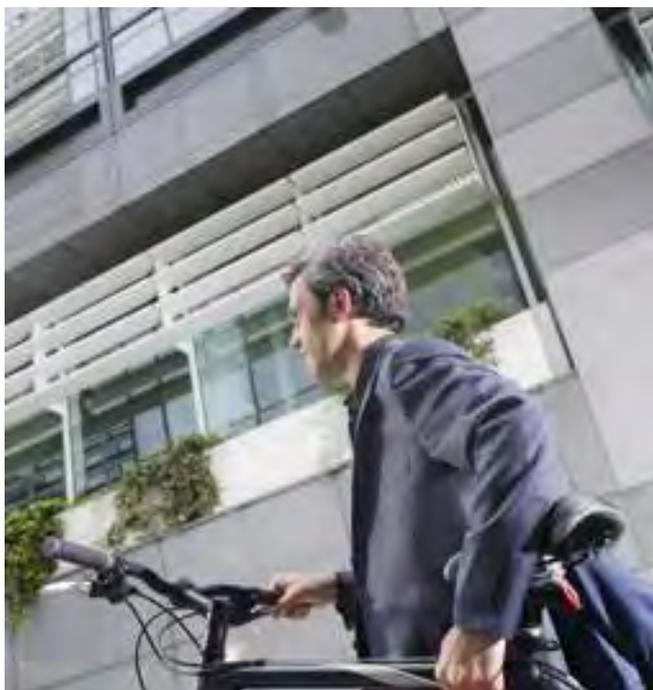


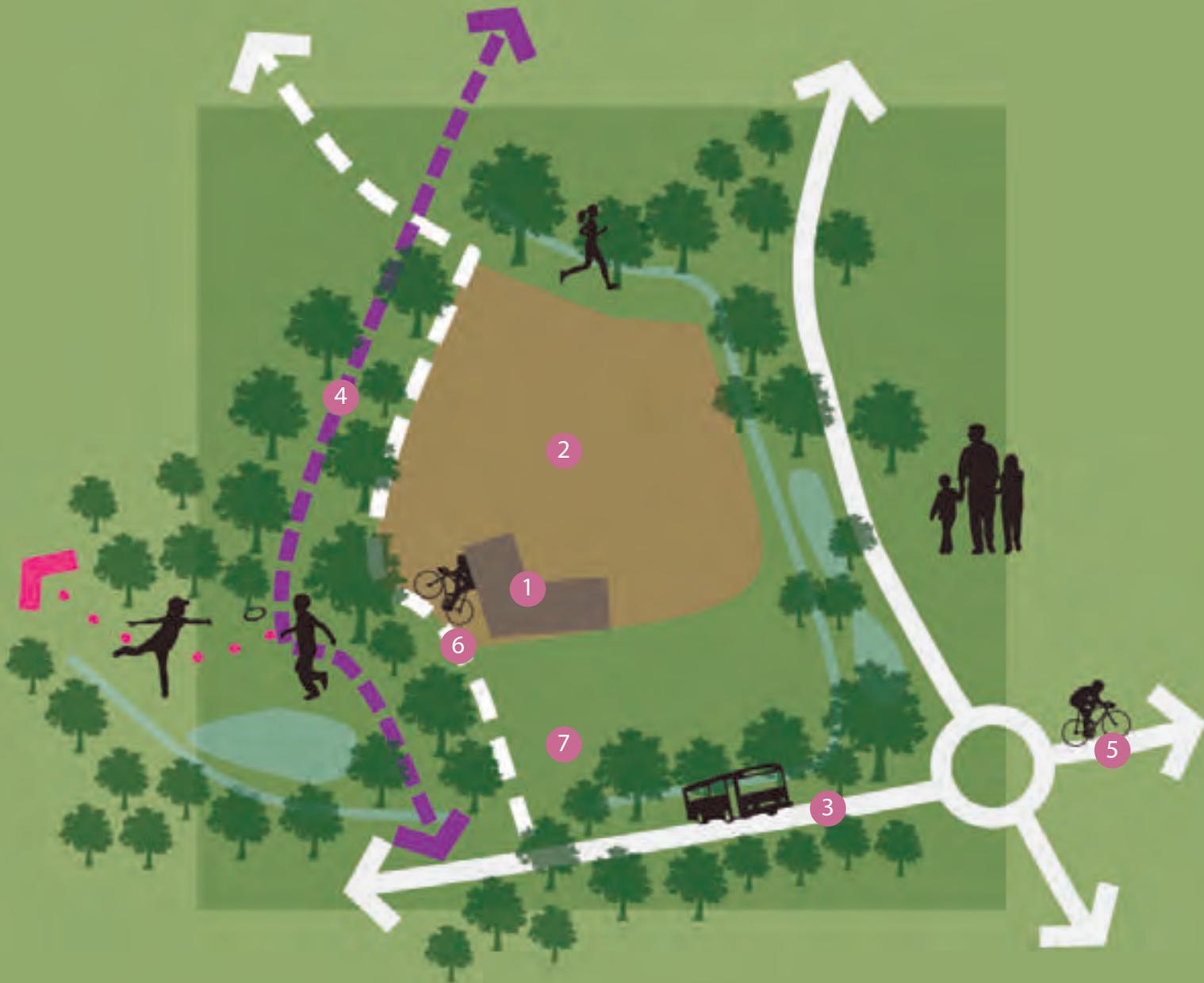
- 1 Primary School
- 2 Opportunity for community Sports pitches
- 3 Potential cycle route along existing track
- 4 A350
- 5 Tree lined primary route
- 6 Existing right of way set in green setting
- 7 Sports hubs with variety of sports provision for new and existing residents

Character Areas

Business Hub with Park and Change Scheme Vision

There is an opportunity for a new business hub to be situated within the south east corner of the site adjacent to the A4. This is a prime location to provide business uses and new employment to Chippenham. Pedestrian connections could connect the new business hub with the existing employment uses east of the A350. The business hub could also include a park and change scheme which would provide sustainable transport links to Chippenham town centre.





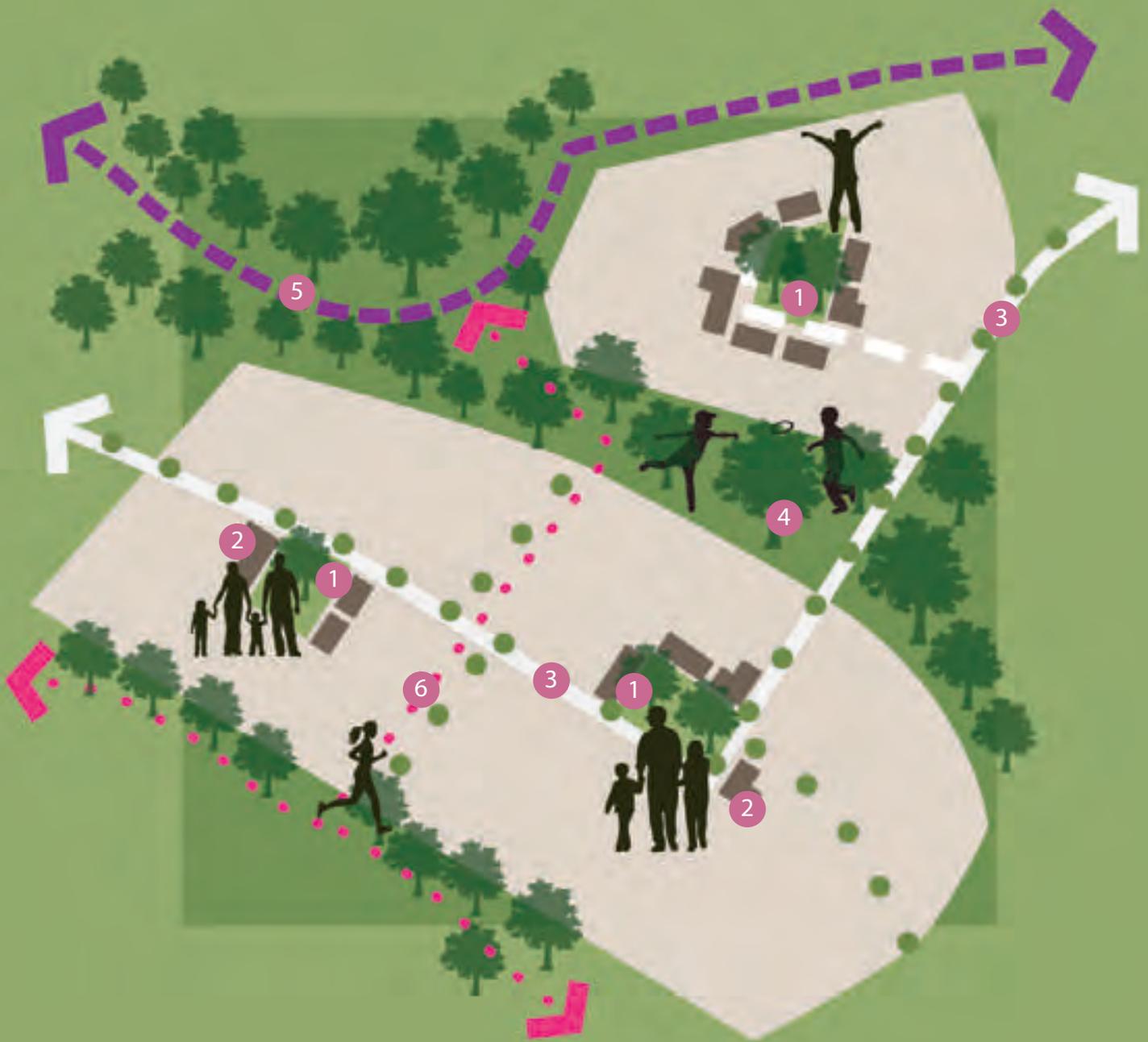
- 1 Business hub at gateway locations
- 2 Park and Change services location
- 3 A4
- 4 Existing right of way set in green setting
- 5 Direct sustainable modes of transport link into Chippenham
- 6 Cycleways provided through the development
- 7 Proposed parkland

Character Areas

Southern Residential Core Vision

Characterised by higher density and green streets with street tree planting and other green features such as rain gardens, planters and swales. The local centre creates a focus for this residential development area, within immediate proximity to green open space and outdoor sports facilities.





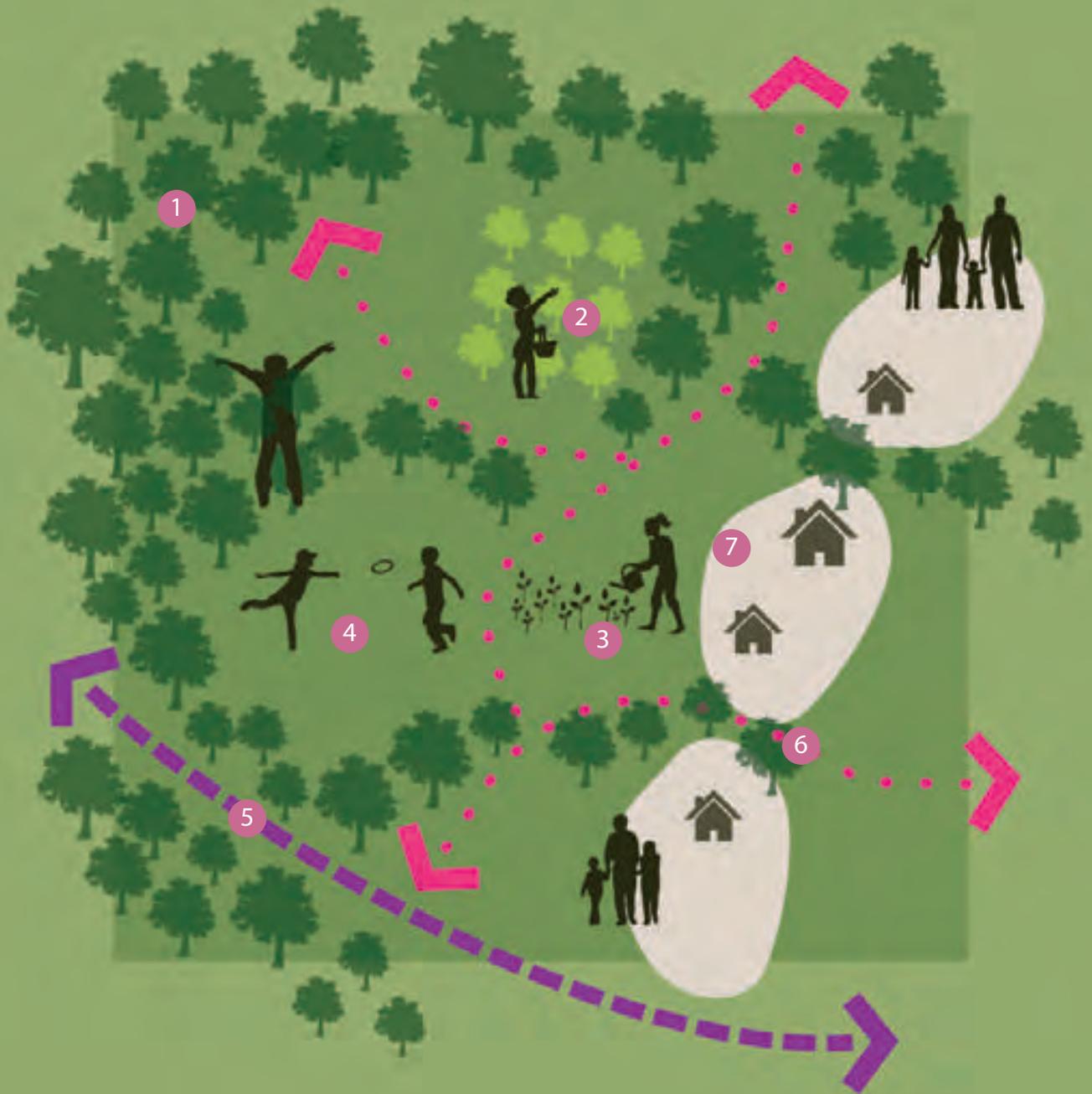
- 1 Pocket parks
- 2 Key building frontage
- 3 Tree lined primary route
- 4 Landscape integrated into the development
- 5 Existing right of way set in green setting
- 6 Pedestrian links provided through the development

Character Areas

Western Green Residential Edge Vision

New homes will be provided around a network of green spaces. With both streets and spaces that reflect a strong character. The development proposed at the green edges, where the dwellings will sit within a landscape setting of proposed new broadleaved tree planting will be lower density and overlook open space.





- 1 New woodland planting
- 2 Orchard planting
- 3 Allotments
- 4 Informal Play space
- 5 Existing right of way set in green setting
- 6 Pedestrian links provided through the development
- 7 Low density housing on development edge





Summary

Summary Conclusion

Land to the West of Chippenham has the potential to provide high quality residential living within the context of Chippenham's existing town and community.

The proposed masterplan has been generated through a clear understanding of the site, and its context. The design and development process presents the opportunity to implement a joined up approach to the masterplan and connected green infrastructure and new woodland, allowing for innovate and best practice approaches to placemaking.

The proposed masterplan has been generated by responding to the site, taking opportunities to provide, retain and enhance the existing context, and to implement green amenity space integrated with proposed drainage infrastructure.

The residential areas alongside public spaces will make use of strong and sustainable connections to both the wider footpath network and routes into the centre of Chippenham.

The new setting will provide a range of house types and tenures which will be supported by opportunities for community infrastructure, connected green infrastructure, and recreation.

This Vision demonstrates how Land at West of Chippenham can be developed to deliver a vibrant, sustainable new community, with its own distinctive identity including a sports hub destination, primary school, and woodland planted western edge.





Turley

**Appendix 2: TN02 - Future Development
Options In Chippenham
(Clarkebond, March 2021)**

TN02 - Future Development Options In Chippenham

Land West of A350 Chippenham



B05451

Bloor Homes

Report No.

B05451/TN01

Date.

04/03/21

Project

Land West of A350, Chippenham

Client Name

Bloor Homes

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1 Introduction

The purpose of this Technical Note (TN) is to review the highway infrastructure proposals for developments surrounding Chippenham, Wiltshire. This TN will focus on a review of developments proposed within the emerging Wiltshire Local Plan to support a new road to the east and south of Chippenham, and a new development proposed by Bloor Homes on land west of the A350.

The proposal for infrastructure improvements to the east and south of Chippenham has already been assessed in an options assessment exercise carried out to identify the most suitable options for alignment. From the data that is readily available from this options assessment, an analysis of the proposals for Land West of the A350 will be undertaken and compared to the other proposals to understand their relative merits.

A strategic site location plan can be seen in **Figure 1.1**.

2 Relevant Policy, Guidance and Documents

2.1 Local Transport Plan 2011

The Wiltshire Local Transport Plan is the third plan of its kind, covering a period between 2011-2026. Its role is to steer the implementation of national transport policies at a local level.

The vision of the plan is to develop a transport system that helps support economic growth across Wiltshire's communities, giving choice and opportunity for people to safely access essential services. Transport solutions will be sensitive to the built and natural environment with an emphasis on reducing carbon emissions.

The goals are to support economic growth, reduce carbon emissions, contribute to better safety, promote equality of opportunity, improve quality of life, and promote a healthy natural environment.

The proposed development is consistent with the vision and goals of the Wiltshire LTP.

2.2 Wiltshire Core Strategy 2015

The vision for Wiltshire is to create a stronger and more resilient community. The underpinning idea of the strategy is to strengthen communities, the underlying principle is to create a balance of jobs, services and facilities and homes. The strategy recognises that previous growth has not been delivered in a proportionate way, where housing has been delivered in locations where there are not enough employment opportunities, which has resulted in out-commuting.

There are several key principles that underpin the strategy including;

- Providing the most sustainable pattern of development that minimises the need to travel and maximises the potential use of sustainable transport.
- Creating the right environment to deliver economic growth, delivering the jobs that Wiltshire's population needs locally and taking a flexible and responsive approach to employment land delivery.
- Managing development to ensure that jobs and the right infrastructure are delivered at the right time to ensure that out-commuting, in particular to areas outside of Wiltshire, is not increasing and development does not have a detrimental impact on infrastructure.
- Working towards lowering Wiltshire's carbon footprint through the appropriate location of development and through renewable energy and sustainable construction.
- Protecting and planning for the enhancement of the natural, historic and built environments, including maintaining, enhancing and expanding Wiltshire's network of green infrastructure to support the health and wellbeing of communities.

The strategy identifies the Bumpers Farm industrial estate and the Methuen Park business park as two of the three Principal Employment Area of Chippenham. The proposed development is conveniently located to access these areas and is consistent with the principles identified.

2.3 Draft Chippenham Transport Strategy Refresh 2015

The Wiltshire Core Strategy identifies Chippenham as a Principal Settlement in Wiltshire and therefore a key location for future employment and residential development. The Chippenham Transport Strategy is Wiltshire Council's proposed long-term approach to meeting the transport needs of the town, within the context of housing and employment growth. The strategy outlines themes that are backed up with specific objectives, the themes of the strategy are as follows:

- Provide for strategic development sites;
- Maintain strategic function of the A350; and
- Improve the accessibility and attractiveness of the town centre.

The strategy is currently in draft form and will be finalised following the Chippenham Site Allocation Plan adoption.

The Chippenham Transport Strategy refresh takes place within a strategic policy framework that are produced for a wide range of purposes to address the overarching needs of Wiltshire. The strategy specifically addresses the need of Chippenham.

The proposed development supports the identified strategic themes – see section 5 for further details.

2.4 Wiltshire Council Local Plan – Site Selection Report for Chippenham 2021

The Wiltshire Core Strategy is the central strategic part of the development plan for Wiltshire. The Core Strategy is being updated with a plan period of 2016-2036. It is important to keep the development plan up to date and ensure that development needs are being met. Chippenham requires 9,225 new homes over the plan period. Considering developments that are already committed an extra 5,100 homes are required.

The site selection report sifts sites that have been proposed on accessibility, flood risk, heritage, landscape and traffic. After this another sift takes place assessing against policy requirements and the place shaping priorities (PSP) the PSPs are as follows.

PSP1 Employment – to provide new employment opportunities with a strong emphasis on timely delivery to redress the existing level of net out-commuting within the town.

PSP2 Town Centre – improve resilience to the town centre by serving as centre of sub regional public service, ensure the centre will be a vibrant meeting place, preserve historical characteristics, develop the bridge centre site, and improve Chippenham railway station.

PSP3 River Avon – To continue to improve access to the River Avon valley through Chippenham as an important green infrastructure corridor.

PSP4 Active Travel – Ensuring a network of well-connected footpaths and cycleways and connectivity for public transport across the town.

PSP5 Traffic – Linking to the A4 and A350 which will provide for a more resilient local network addressing traffic congestion within the town centre.

PSP6 Surrounding Countryside – Respect the individual identities of villages within the landscape setting.

The proposed development supports the place shaping priorities where relevant – see section 5 for further details.

2.5 Future Chippenham Road Design – Options Assessment Report 2021

Future Chippenham has appointed Atkins to support the delivery of the distributor road to the east and south of Chippenham, for this they have produced an Options Assessment Report (OAR) which includes an assessment of route options in terms of environmental impact, deliverability, transport network impact and value for money to identify the most appropriate route for the road.

The proposed alignment of the distributor road can be seen in **Appendix A**.

The OAR sought to sift options for the road in two phases to identify which options are the best fit. Strategic data for the sift has been obtained from the HIF Bid Options Assessment, Concept Framework Development Quantum, and Future Chippenham Spatial Framework. Data has been provided in the OAR that can be directly compared to the proposed site on Land West of the A350 will be used as a comparison.

The OAR calculates the scheme costs for the three route options, the calculations include construction cost, preparatory, supervision and Land, base cost, risk, inflation, and inflation due to COVID-19. The option costs are set out below.

Option A – Outer Route – £104,534,347 to £120,104,003

Option B – Middle Route - £96,826,723 to £112,253,026

Option C Inner Route - £93,345,096 to £108,567,012

The proposed development does not require this scale of infrastructure cost.

3 Existing Highway Conditions

3.1 Chippenham Highway Network

Chippenham is a market town in northern Wiltshire with approximately 45,000 residents as of the 2011 census. The town is located approximately three miles south of Junction 17 of the M4. The main routes through town are as follows.

The A350 is dual carriageway route that can be followed south from M4 Junction 17 that wraps around the western boundary of the town before continuing south towards Melksham and Trowbridge. The A350 is a dual carriageway for most of its length past Chippenham, with a small section of single carriageway between the Bumpers Farm Roundabout and the Cepen Park South Roundabout. As it passes Chippenham the A350 is known as the Western Bypass. South of Chippenham the A350 connects the Chequers roundabout to Lackham roundabout, which then travels south towards Melksham.

The A420 commences at the Bridge Roundabout in the centre of Chippenham and travels north west through the town towards the Bumpers Farm roundabout before continuing onto Bristol.

The A4 road runs east to west through Chippenham from the roundabout of London Road and Pewsham Way in east Chippenham to the Chequers Roundabout in west Chippenham. The road connects to the towns of Calne in the east and Corsham in the west. The A4 runs through the centre of Chippenham over the river Avon. All traffic travelling through Chippenham must cross the river at two locations, the High Street Bridge or through the signalised junction of Gladstone Road and Avenue-La-Fleche.

3.2 Existing Highway Constraints

The A350 is a main haulage route for HGVs into and through Chippenham. The A350 is mostly a dual carriageway past Chippenham however a section of the road only has one lane in either direction between Bumpers Farm roundabout and Cepen Park South roundabout.

As Chippenham High Street is closed to vehicle traffic between 9:30am and 7:30pm the junction of Gladstone Road and Avenue-La-Fleche can become congested as it must carry all traffic wishing to travel through the town. This has a knock-on effect at the bridge roundabout immediately north of the junction.

3.3 Recent Highway Development Scheme

Between July 2017 and August 2018, a £7.2 million highway improvement scheme was undertaken on junction 17 of the M4 and the A350 Western Bypass. The scheme involved:

- Signalised slip roads for traffic exiting the motorway at Junction 17 of the M4;
- Widening the A350 to dual carriageway between Badger and Brook roundabouts, as well as between Cepen Park South and Chequers roundabouts;
- Additional widening to allow for suitable merge lengths back to a single lane in either direction, and to allow for two lanes on the A350 approaches to the roundabouts.

- A new formal segregated layby on the northbound carriageway south of Chequers, to replace the existing unsegregated layby.
- Widening the A4 Bath Road westbound approach to Chequers, along with widening the A4 westbound exit, providing two lanes across the junction for A4 westbound traffic.

The scheme was funded via the Local Growth Fund which is operated by the Swindon and Wiltshire Local Enterprise Partnership. Wiltshire Council has improved the A350 Western Bypass as and when funding has become available.

A further funding bid for dualling between Chequers roundabout and Lackham roundabout was submitted in July 2016 however this was unsuccessful. Dualling the section between Bumpers Farm roundabout and Cepen Park South roundabout has not been progressed at this time due to funding and value for money considerations.

4 Proposed Developments to the East and South of Chippenham

4.1 Proposed Highway Routes

In March 2019 Wiltshire Council submitted a bid to the Housing Infrastructure Fund (HIF) provided by the Ministry of Housing, Communities and Local Government (MHCLG). In November 2019 Wiltshire Council was awarded £75 million to ensure that funding is available to contribute towards the cost of delivering longer-term growth.

In October 2020 the Council entered into a Grant Determination Agreement (GDA) with Homes England to secure the funding. The GDA allows Wiltshire Council to use any remaining funds to invest into other infrastructure to support the delivery of additional housing in Wiltshire.

The grant is proposed to support the delivery of a new distributor road to the east and south of Chippenham that will connect to the A350 at the northern end of the town.

The general alignment of the three proposed routes can be split into two sections:

- **East Chippenham** – From the Rawlings Green approved development, north of Monkton Park, across the river Avon eastward, then turning south towards the A4.
- **South Chippenham** – connecting the A350 to the A4 south of Pewsham and South West Chippenham, the route also crossing the river Avon.

The three possible routes can be seen in **Appendix A**. The following paragraphs include some key information about the two routes from the Wiltshire Council Options Assessment Findings Summary Report.

4.1.1 Route A – Outer Route

The outer link is likely to operate as a ring road, a bridge over the Wilshire and Berkshire canal will contribute to a high delivery cost. Route A has the highest impact on the environment and will be potentially visible by hamlets to the east. Route A requires an additional link road to access development areas at East Chippenham.

The OAR estimates the cost of delivering this route to be between £104,534,347 - £120,104,003. After the HIF funding is included there is a shortfall of £30-45 million.

4.1.2 Route B – Middle Route

The middle link is the second shortest road with the second lowest delivery cost estimate, Route B has a direct connection to the National Cycle Network Route 403 and therefore a link into town. Route B also requires an additional link road to access development areas at East Chippenham.

The OAR estimates the cost of delivering this route to be between £96,826,723 - £112,253,029. After the HIF funding is included there is a shortfall of £22-37 million.

4.1.3 Route C – Inner Route

Route C is the shortest and had the lowest delivery cost, it provides the highest quality connectivity from all type of transport networks. Route C will have an impact on the Rowden Park conservation area and Stanley Park recreational ground. The Inner route will provide the best potential for cycle routes to surrounding areas using existing Public Rights of Way, including National Cycle Network Route 403.

The OAR estimates the cost of delivering this route to be between £93,345,096 - £108,567,012. After the HIF funding is included there is a shortfall of £18-34 million.

A best fit route has been identified as mostly Route C with sections of Route B. This can be seen in **Appendix A**. The new distributor road will have a funding shortfall of at least £18 million that will have to be contributed by developers. Funding shortages could rise well beyond that which will increase risk associated with the viability of the development sites that the distributor road will unlock.

4.2 Associated Development

The proposed distributor road to the east and south of Chippenham will unlock land for up to 7,500 dwellings accessed along its route. The wider strategic function of the distributor road will alleviate pressure on the town centre and throughout the town, this will provide spare capacity to unlock developments elsewhere in the town.

While this will go a long way to meeting the needs for housing in Wiltshire it has been identified in the options assessment for the distributor road that a large environmental cost will be borne by these developments.

While careful consideration has been taken to assess the required cost of the implementation of this route, any funding shortfalls will require development contribution. This may impact the viability of certain developments due to the larger risk associated with projects such as bridge construction and environmental and ecological mitigation.

Due to the location of the development, new bus routes will be required to serve these communities and tie them into the wider area, this will dilute the patronage of existing services where the new bus will travel through existing routes in the town and reduce the sustainability of some public transport options.

Due to the distance from the town centre some sections of the proposed development will not have high quality accessibility to the rest of Chippenham for pedestrians and cyclists, delivering this infrastructure is in no way guaranteed with the delivery of the proposed distributor road. This may result in isolated communities and urban sprawl.

4.3 Options Assessment Sift

4.3.1 Methodology

Route options for the distributor road have been analysed through two rounds of sifting various data sources to identify the optimum route for the road. The analysis is taken over five zones, three in the eastern section and two in the southern section as follows:

- Zone One is defined a land to the west of Lackham College, which can be found directly south of the Pewsham estate;
- Zone Two is defined as land between zone one and the A4 London Road;
- Zone Three is land north of the A4 London Road and south of NCN Route 403;
- Zone Four is land to the north of NCN 403 and east of river Avon; and
- Zone Five is land to the north of NCN 403 and west of river Avon.

The first sift reviewed six alignment options and four links to Pewsham. The first sift resulted in discarding unsatisfactory routes to leave the three possible routes as defined in this chapter.

The criteria of the sift must be at least partially met, to do this a qualitative assessment was made on a three-point scale:

- 3 = Fully meets objectives
- 2 = Partially meets objectives
- 1 = Neutral/negative impact.

The first sift assessment criteria are as follows:

Strategic Case:

1. Enables the delivery of high-quality housing developments by unlocking development land, meeting pre 2036 (Local Plan) and post 0236 (HIF) housing quantum.
2. Improve traffic congestion and flow across the existing road network, ensuring the transport network has the capacity to accommodate growth.
3. Provide good connectivity for mutli-modal users at new centres and into Chippenham town centre, improving journey times and journey time reliability.

Deliverable Case

1. Environmental Review.
 - a. Flood Risk and Drainage
 - i. Flood Zone crossing up to 250 metres – Score 3.
 - ii. Flood Zone crossing between 250m and 500m – Score 2
 - iii. Flood Zone crossing greater than 500m – Score 1
 - b. Ecological Impact
 - i. Greater than 100m from national designated site/habitat records. Score - 3
 - ii. Within 100m of local or national designated site/habitat records. Score - 2
 - iii. Direct conflict with conservation area/within 500m of scheduled ancient monument. Score - 1

- c. Heritage and Archaeology
 - i. Greater than 100m from conservation area/listed building/heritage record. Score – 3
 - ii. Within 100m of local or conservation area/listed building/heritage record. Score – 2
 - iii. Direct conflict with conservation area within 500m of scheduled ancient monument. Score – 1
2. Engineer Assessment.
 - a. Total structural length up to 250m Score – 3
 - b. Total structural length between 250m and 500m. Score – 2
 - c. Total Structural length greater than 500m. Score – 1
3. Land Strategy
 - a. Full Wiltshire Council Land ownership/land allocated in Chippenham Site Allocation Plan/planning permission approved. Score – 3
 - b. Landowner/developer letter of support to HIF bid, and/ or land put forward for future development within Strategic Housing Land Availability Assessment. Score – 2
 - c. Objection to scheme/route option. Score – 1

Data that has informed the first options sift has been lifted from the OAR and can be seen in **Appendix B**.

4.3.2 Results

Below is an extract from the OAR that summarises the first sift of options for the new distributor road.

| Zone Reference | Strategic Case | Delivery Case | Taken forward to 2nd Phase? |
|------------------------|-----------------------------------|---|-----------------------------|
| | Overall Assessment | Overall Assessment | |
| ZONE 1: Option A | 2. Partially satisfies objectives | 2. Deliverable but high complexity/risk | Yes |
| ZONE 1: Option B | 3. Strongly satisfies objectives | 2. Deliverable but high complexity/risk | Yes |
| ZONE 1: Option C | 3. Strongly satisfies objectives | 2. Deliverable but high complexity/risk | Yes |
| ZONE 1: Option D | 3. Strongly satisfies objectives | 1. Unlikely to be deliverable | No |
| ZONE 2: Option A | 2. Partially satisfies objectives | 2. Deliverable but high complexity/risk | Yes |
| ZONE 2: Option B and C | 3. Strongly satisfies objectives | 2. Deliverable but high complexity/risk | Yes |
| ZONE 2: Option F | 1. Neutral / adverse | 2. Deliverable but high complexity/risk | No |
| ZONE 3: Option A | 2. Partially satisfies objectives | 2. Deliverable but high complexity/risk | Yes |
| ZONE 3: Option B and C | 3. Strongly satisfies objectives | 2. Deliverable but high complexity/risk | Yes |
| ZONE 3: Option F | 1. Neutral / adverse | 2. Deliverable but high complexity/risk | No |
| ZONE 4: Option A | 2. Partially satisfies objectives | 2. Deliverable but high complexity/risk | Yes |
| ZONE 4: Option B and C | 2. Partially satisfies objectives | 2. Deliverable but high complexity/risk | Yes |
| ZONE 4: Option E | 2. Partially satisfies objectives | 1. Unlikely to be deliverable | No |
| ZONE 5: Option A | 3. Strongly satisfies objectives | 2. Deliverable but high complexity/risk | Yes |
| ZONE 5: Option E | 2. Partially satisfies objectives | 1. Unlikely to be deliverable | No |

It can be seen that neutral/negative impacts have not been taken forward. There have been no zones that have high scores for both the strategic and deliverable case.

Three of these highest scoring zone options will be taken forward and compared with infrastructure proposals required for the delivery of Land West of A350 Chippenham.

These areas are as follows:

- Zone One – Option B;
- Zone Two – Options B and C; and
- Zone Three – Options B and C.

5 Land West of A350 Chippenham

5.1 Proposed Development

Bloor Homes are proposing a development on the western edge of Chippenham between the important economic corridors of the A350 and the A4 Bath Road. The site is approximately two miles from the centre of Chippenham, although the employment, leisure and retail facilities at Bumpers Farm industrial estate and Methuen Park business park are in the immediate vicinity of the site.

Bath is located 12 miles west following the A4 which forms the southern boundary of the site, Trowbridge is 14 miles south on the A350 which forms the eastern boundary of the site.

Importantly no new distributor roads or large, off site, infrastructure projects will be required to access this development which is already well connected to two major routes. The Wiltshire Council Site Selection report has concluded that this location has no significant harmful effects on congestion corridors.

New junctions will be required to serve the development, these will have to incorporate access for public transport, cycling and walking. Proposals may include bus gateways, and a new iconic cycle/pedestrian bridge over Chequers Roundabout. Providing high quality infrastructure for pedestrians, cyclists and public transport users will encourage a greater uptake of these modes. This will provide transport, environmental and health benefits. Improving active travel infrastructure is the aim of the Local Plans PSP4 and improving the A350 is the aim of PSP5.

As the site is located on the A350 and the development will provide infrastructure improvement some vehicle traffic will be drawn away from the town centre. While there will be a slight increase in traffic, the inclusion of a local centre will also reduce the need to travel into the town centre, and the location of the development will reduce the need to drive through the town centre. This can be delivered without new large off site infrastructure at greenfield locations.

The site does not have any effects on villages near to Chippenham and their landscape setting which accords with PSP6 of the Local Plan.

PSP3 of the Local Plan aims to improve access to the River Avon Corridor, the site does not have access to the River Avon Corridor however it is within the immediate vicinity of the Corsham Court estate which provides similar benefits for leisure and local ecology, Corsham Court is considered to meet the same needs as the River Avon Corridor.

5.2 Development of Land West of A350

The proposed site is located within the immediate vicinity of two of the three Principal Employment Areas of Chippenham identified in the Wiltshire Core Strategy. Methuen Park is accessible after a five minute walk from the southern extent of the site. Bumpers Farm industrial estate can be accessed after a 20 minute walk, or a five minute cycle from the Drakes Crescent access location. Supporting these developments will reduce the level of out-commuting and support businesses within the area, a key goal of the Core Strategy.

There is potential to incorporate existing bus services into the development proposal that will not dilute the patronage of existing services. The site is located on the A4 which is an existing high frequency bus corridor, there are also existing proposals to improve the corridor. There is a proposal for a new 'Wiltshire Whippet' service between Bath and Chippenham, an initiative led by Bath and North East Somerset (B&NES) Council, which will feature fewer stops and include 'pocket park and ride' interchanges. The proposed development will feature a park and change site with car and cycle parking. The 'Wiltshire Whippet' proposal, if it were to go ahead, would reduce the number of car trips along the A4, that could be directly tied into the site. The delivery of the proposal will be subject to a feasibility study.

Existing infrastructure such as the Chequers Roundabout and the Drakes Crescent junction onto the A350 can be upgraded to a higher quality which will benefit existing residents. The development will have to deliver improvements to the Chequers Roundabout which is already approaching capacity. There currently is no plan to upgrade the roundabout as part of the proposed distributor road, even though the route will increase traffic along the A350 to alleviate pressure on central Chippenham. This development will deliver these improvements.

The site will provide good connectivity to Corsham which would deliver one of the benefits of the distributor road without the construction of a new road.

The proposed access strategy for the Land west of A350 development consists of three access points as follows:

- Primary Vehicle Access – new 60m diameter roundabout on A350 approximately 200m north of Drakes Crescent;
- Secondary Vehicle Access - new ghost island priority junction on the A4 at the southern extent of the site; and
- Third Access – A350 road crossing opposite Drakes Crescent and for pedestrians and cyclists, there is also potential for this to offer bus access.

The proposed development on land to the west of the A350 can be considered to meet the objectives set out in the Chippenham Transport Strategy that can be seen in **Table 1**.

Table 1 Assessment of Proposed Site against Chippenham Transport Strategy Objectives

| | Objectives | Proposed Development |
|--|--|--|
| Providing for strategic development sites | Objective 1: Deliver a transport network for Chippenham that can support planned growth at development sites and minimise the impact of increased travel demand on existing residents | The proposed development will improve the A350 with high quality junctions. Local improvements to walking cycling and public transport will provide improvements for existing residents. |
| | Objective 2: Ensure development sites provide for necessary on-site, and appropriate off-site, transport infrastructure and services to accommodate and mitigate travel demand generated by the development. | Multiple site accesses will provide a high level of service to all users. Appropriate mitigation will be implemented at the Chequers roundabout and other junctions that require improvements. |
| Maintaining strategic function of A350 and key routes | Objective 3: Minimise current and future traffic delay and disruption on the Chippenham transport network and improve journey time reliability on the A350, A4, A420 and M4 Junction 17. | The proposed development can introduce measures to the A350 corridor consistent with access proposals to improve journey time reliability. |
| | Objective 4: Safeguard the role of the A350 as a strategic route to ensure vehicles, including freight, travel on the most appropriate route. | The proposed development access arrangements do not compromise the strategic role of the A350, development access is direct to it. |
| | Objective 5: Improve road safety for all transport network users and help reduce the number of casualties in Chippenham. | The proposed development access strategy to the A350 will deliver road safety improvements. |
| Improving the Accessibility & attractiveness of town centre | Objective 6: Support sustainable access to the town centre, railway station, healthcare facilities, employment, training and social opportunities across Chippenham, by delivering and promoting a transport network which makes walking, cycling and travelling by bus a safe and convenient option for shorter distance journeys. | Active travel and public transport will be central in the transport strategy with dedicated corridors connecting to existing routes. A Travel Plan will be promoted within the development that will reduce single occupancy car travel. |
| | Objective 7: Facilitate and promote convenient and safe sustainable transport (bus and rail) options for people travelling longer distances to the town, particularly for retail, leisure and employment purposes, and to assist residents who need to travel further for employment. | Existing public transport options will be promoted and improved, this will be supported by a Travel Plan, key employment sites are within walking and cycling distance of the proposed development. |
| | Objective 8: Improve connectivity and manage traffic to reduce the negative effects of congestion on Chippenham town centre. | Improvements for active travel and public transport will reduce the need for single occupancy car travel and reduce vehicle traffic pressure on the town centre. |

As can be seen in Table 1 above the proposed development site at Land west of A350 Chippenham will satisfy the objectives set for the Chippenham Transport Strategy.

The Wiltshire Local Plan recommends reviewed the proposed development against six place shaping priorities as can be seen in **Table 2**.

Table 2 Proposed development site place shaping priorities review – Local Plan

| PSP | Review | Comments |
|-------------------------------|----------|--|
| PSP 1 Employment | Strength | Could include employment land as part of a mixed-use development to enable people to live and work locally. The site benefits from a location adjacent to A350 which is an important economic corridor. The A350 is a barrier to linking any development with the town, however this severance can be overcome providing opportunities for people to travel to and from the site by foot or bicycle in particular. |
| PSP 2 Town Centre | Neutral | The town centre is accessible via the A350/A4 bus services as this site is on the western side of the A350. The issue of severance will be addressed for pedestrian and cyclists which will encourage active travel trips to the town centre. There are shops and facilities in the Cepen Park, Bumpers Farm, and Bath Road areas which will be attractive. |
| PSP 3 the River Avon Corridor | Neutral | The proposed development will not detract from people’s ability to access the amenity, nor will the development have a negative impact on the area by bringing and urban development onto its boundary. |
| PSP 4 Accessibility | Neutral | The Site is located adjacent to the A4/A350. This is a large site where there is the space to include a network of well-connected footpaths and cycleways and connectivity for public transport can be provided. A wide range of facilities are within walking and cycling distance. |
| PSP 5 New Infrastructure | Strength | The proposal does not require building of new roads and there will be improvements to the A350 to make the route more resilient. The development will have no adverse effects on congestion in the town centre. |
| PSP 6 Surrounding Villages | Strength | The site does not have any effect on villages near to Chippenham and their landscape setting. |

The proposed development on Land west of A350 Chippenham has been discounted within the emerging Local Plan site selection process due to PSP 3 and PSP 5 being perceived as weaknesses.

The Local Plan review states that PSP 3 is a weakness for the following reason,

‘This site is not located near to the River Avon and therefore does not provide the opportunity to improve access to the River Avon valley through Chippenham. It is not applicable.’

While the site is away from the River Avon Corridor the proposed development will not detract from people’s ability to access the amenity, nor will the development have a negative impact on the area by bringing and urban development onto its boundary, this site should be considered to have a neutral impact.

The Local Plan review also states that PSP 5 is a weakness for the following reason

‘The site is located adjacent to the A4/A350. It does not provide any opportunities to provide for a more resilient network addressing traffic congestions within the town.’

The proposed development will be accessed directly onto the A350 and A4 which will provide an opportunity to improve the operation and safety of these highway sections. Improving these

corridors will extract vehicle traffic from the town centre as these routes become more attractive to drive for existing road users. This will occur as the routes will flow more consistently improving journey time reliability. By delivering housing without new significant off-site infrastructure will prevent the induced demand brought on by developments which will have a positive impact of the wider environment.

Mitigation for severance by the A350 for the development will have an active travel emphasis to encourage walking and cycling and reduce the share of people undertaking single occupancy vehicle travel. The site should be considered a strength that major new infrastructure is not required.

5.3 Options Assessment Comparison

5.3.1 Methodology

There are currently three options for accessing the proposed site. These three options will be compared to the three highest scoring zones for the distributor road. The data that has informed the OAR sift will be used to review the access proposals for Land West of A350.

The strategic case (see section 4.3) will be set out against the objectives identified in the OAR sift (Section 4.3.1). The deliverable case (see section 4.3) uses a quantitative scoring system that is not fit for another site. The OAR defined its scoring system to help identify the key differences between the route options, as a result the grading does not apply to other environments well due to their concise nature.

Clarkebond has identified a Red Amber Green (RAG) 'Traffic Light' score that will be applied to the access proposals for Land West of A350 in comparison to the distributor road as follows:

- Green will be applied if the proposal is an improvement on the distributor road proposal;
- Amber will be applied if the case is broadly similar; and
- Red if the proposal is worse.

For the purposes of the analysis, Zone one will be compared to the proposed access roundabout to the north of the site, Zone two will be compared to the proposed access west of Drakes Crescent and Zone three will be compared to the access location on the A4. The terminology and approach used in the OAR sift has been applied.

5.3.2 Results

Northern Access

Strategic Case – The primary access roundabout would unlock land West of the A350 which currently cannot be accessed. The implementation of this junction will result in queuing at this location, this will reduce the pace at which vehicles arrive at associated junctions, alleviating pressure. The resulting reduction of vehicle speeds around this location will enable safer movements between the centre of the development and western Chippenham.

This can be considered to fully meet its objectives. In comparison to the strategic case for Zone One, Option B, which has considered to fully meet its objectives, this can be given an amber score.

Deliverable Case – The proposed access does not come into contact with any flood land, significant biodiversity or within the immediate vicinity of a listed building. There are no structural requirements, and the land is split between public highways and land available to Bloor Homes.

In comparison to the deliverable case for Zone One – Option B it can be considered green as there are no constraints associated with implementing this access from the available data. A summary of the scoring of the objectives can be seen in **Table 3** below.

Table 3 Northern Access Options Assessment Comparison

| Objectives | Distributor Road | Land West of A350 | RAG Score |
|----------------------------------|-------------------------|----------------------|-----------|
| Strategic Case | | | |
| Delivery of High Quality Housing | Satisfies objectives | Satisfies objectives | Amber |
| Improve Traffic Congestion | Satisfies objectives | Satisfies objectives | Amber |
| Provide Good Connectivity | Satisfies objectives | Satisfies objectives | Amber |
| Deliverable Case | | | |
| Flood Risk and Drainage | Deliverable but complex | Deliverable | Green |
| Ecological Impact | Deliverable but complex | Deliverable | Green |
| Heritage and Archaeology | Deliverable but complex | Deliverable | Green |
| Engineering Assessment | Deliverable but complex | Deliverable | Green |
| Land Strategy | Deliverable but complex | Deliverable | Green |

Middle Access

Strategic Case – accessing the site adjacent to Drakes Crescent would unlock land West of the A350 which currently cannot be accessed. Adding more junctions will redistribute queuing throughout the network and alleviate pressure from building up in problematic locations. This location is proposed to provide a high-quality connection for pedestrian and cyclists which will promote active travel throughout the site, higher levels of active travel will have a compounding effect on uptake in the wider area.

This can be considered to fully meet the strategic objectives at this location. In comparison to the strategic case for Zone Two - Options B and C, which is also considered to fully meet its objectives, this can be given an amber score.

Deliverable Case – The access location does not come into contact with any flood land or significant biodiversity, it is also not with the immediate vicinity of any listed buildings. There are no structural requirements, and the land requirements are a split of public highways and land available to Bloor Homes.

In comparison to the deliverable case for Zone Two – Option B and C, it has scored green as there are no constraints associated with implementing this access from the available data. A summary of the scoring of the objectives can be seen in **Table 4** below.

Table 4 Middle Access Options Assessment Comparison

| Objectives | Distributor Road | Land West of A350 | RAG Score |
|----------------------------------|-------------------------|----------------------|-----------|
| Strategic Case | | | |
| Delivery of High Quality Housing | Satisfies objectives | Satisfies objectives | Amber |
| Improve Traffic Congestion | Satisfies objectives | Satisfies objectives | Amber |
| Provide Good Connectivity | Satisfies objectives | Satisfies objectives | Amber |
| Deliverable Case | | | |
| Flood Risk and Drainage | Deliverable but complex | Deliverable | Green |
| Ecological Impact | Deliverable but complex | Deliverable | Green |
| Heritage and Archaeology | Deliverable but complex | Deliverable | Green |
| Engineering Assessment | Deliverable but complex | Deliverable | Green |
| Land Strategy | Deliverable but complex | Deliverable | Green |

Southern Access

Strategic Case – Accessing from the A4 Bath Road would unlock land West of the A350 which currently cannot be accessed. There is an opportunity to improve the two-lane roundabout exit at Chequers roundabout, the effect would improve traffic flow through the junction. There is also an opportunity to provide a high quality, iconic piece of cycling infrastructure at this location.

This can be considered to fully meet the strategic objectives at this location. In comparison to the strategic case for Zone Three, Options B and C, which has considered to fully meet its objectives, this can be given an amber score.

Deliverable Case – This access location does not come into contact with any flood land however it is within 100m of deciduous woodlands south of the A4. It is greater than 100m from any conservation area or listed building. There are no structural requirements, and the land requirements are a split of public highways and land available to Bloor Homes.

In comparison to the deliverable case for Zone Three – Option B and C, it has scored green. Even though there may be a small ecological impact development near a strip of deciduous woodland, the area scores highly for other deliverable criteria. A summary of the scoring of the objectives can be seen in **Table 5** below.

Table 5 Southern Access Options Assessment Comparison

| Objectives | Distributor Road | Land West of A350 | RAG Score |
|----------------------------------|-------------------------|-------------------------|-----------|
| Strategic Case | | | |
| Delivery of High Quality Housing | Satisfies objectives | Satisfies objectives | Amber |
| Improve Traffic Congestion | Satisfies objectives | Satisfies objectives | Amber |
| Provide Good Connectivity | Satisfies objectives | Satisfies objectives | Amber |
| Deliverable Case | | | |
| Flood Risk and Drainage | Deliverable but complex | Deliverable | Green |
| Ecological Impact | Deliverable but complex | Deliverable but complex | Amber |
| Heritage and Archaeology | Deliverable but complex | Deliverable | Green |
| Engineering Assessment | Deliverable but complex | Deliverable | Green |
| Land Strategy | Deliverable but complex | Deliverable | Green |

5.3.3 Summary

Table 6 presents a comparison of the sift for the proposed distributor road and the effects of development land west of the A350.

Table 6 Options Assessment Comparison

| Land east and south of Chippenham | | | Land to the west of A350 | | |
|-----------------------------------|--------------------------|-----------------------------|--------------------------|----------------------|------------------|
| Location | Strategic Case | Deliverable Case | Location | Strategic Case | Deliverable Case |
| Zone One – Option B | 3 – satisfies objectives | 2 – deliverable but complex | Northern Access | Satisfies objectives | Deliverable |
| Zone Two – Option B + C | 3 – satisfies objectives | 2 – deliverable but complex | Middle Access | Satisfies objectives | Deliverable |
| Zone Three – Option B + C | 3 – satisfies objectives | 2 – deliverable but complex | Southern Access | Satisfies objectives | Deliverable |

Table 6 demonstrates that the proposed development of Land to the west of A350 satisfies the strategic objectives equality as highly as the proposed Distributor Road. The Land to the west of A350 proposal has been found to be more deliverable across multiple objectives than the proposed Distributor Road.

6 Summary and Conclusions

6.1 Proposed Eastern and Southern Distributor Road

Wiltshire Council have been awarded a £75 million pound grant to improve infrastructure that will ensure that funding is available to contribute towards the cost of delivering longer-term growth. The grant is proposed to support the delivery of a new distributor road to the east and south of Chippenham that will connect to the A350 at the northern ends of the town.

The proposed distributor road to the east and south of Chippenham will unlock land for up to 7,500 dwellings. While this will go a long way to meeting the needs for housing in Wiltshire it has been identified that a large environmental cost will be borne by these developments that has been identified in the options assessment for the distributor road. There will be a significant funding shortfall from the HIF funding to the cost of delivering the road, at minimum £18 million.

Route options for the distributor road have been analysed through two rounds of sifting various data sources to identify the optimum route for the road in the Options Assessment Report.

6.2 Proposed Site to the West of A350

Bloor Homes are proposing a development on the western edge of Chippenham between the A350 and the A4 Bath Road. The site is approximately two miles from the centre of Chippenham, although the employment, leisure, and retail facilities at Bumpers Farm industrial estate and Methuen Park business park are in the immediate vicinity of the site.

New access junctions will be required to serve the development these will include good quality public transport, cycling and walking access. Proposals will overcome the severance of the A350 and offer the opportunity to improve safety and journey time reliability along the A350 corridor. The development could include a park and change site with car and cycle parking to maximise potential improvements to the A4 bus corridor and a new iconic cycle/pedestrian bridge over Chequers Roundabout. The site will provide good connectivity to Corsham which would deliver one of the benefits of the distributor road without having to undertake such an infrastructure project.

The proposed site is demonstrated to accord with local policy objectives for The Draft Chippenham Transport Strategy and the place shaping priorities of the Wiltshire Local Plan.

6.3 Options Assessment Sift

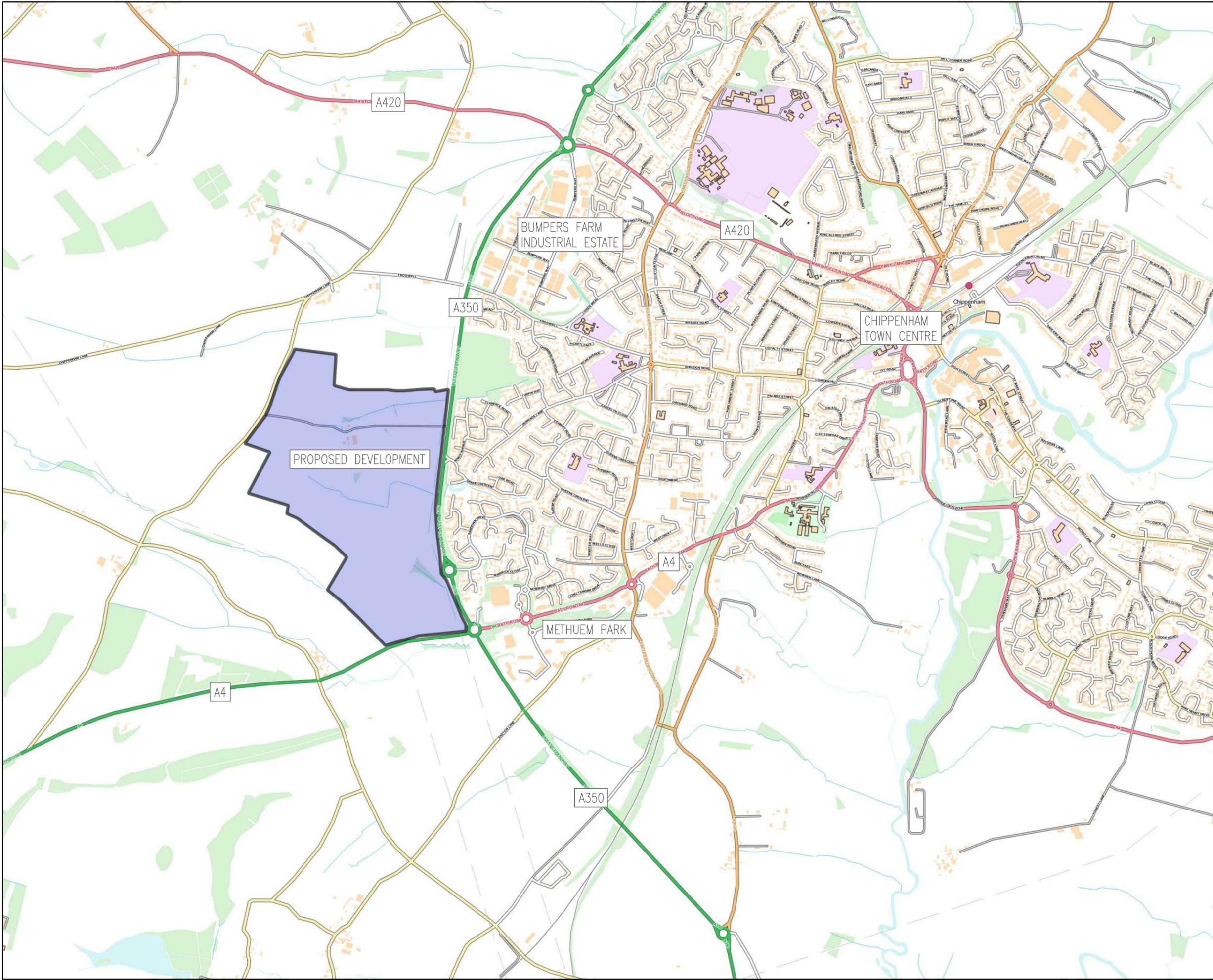
Three of the highest scoring zone options for the distributor road have been compared to three options for accessing the proposed site west of the A350. A traffic light grading system has been applied and this demonstrates that the proposed development access strategy is better than the distributor road proposal.

6.4 Overall Conclusion

While Land to the east and south of Chippenham may be developed to deliver improvements to the town, the proposed site on land to the west of A350 will be able to deliver an equally high-quality, if not better, development, without the requirements for a multimillion-pound infrastructure project.

Figures

DWG INFO: M:\BS1192\B05451 - LAND WEST OF A350 CHIPPENHAM\01_WIP\RP_REPORT\TRANSPORT PLANNING\WALKING AND CYCLING\ISOCHRONES\CAD\FRAMES



CDM RESIDUAL RISKS

The work shown on this drawing is both familiar to the designers and routinely safely built in similar circumstances by competent contractors.

Risks are not considered significant.

Relevant data is included in the Pre-Construction Information Pack

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* PRELIMINARY FIRST ISSUE.

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Revisions

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Project
 LAND WEST OF A350
 CHIPPENHAM

Drawing Title
 SITE LOCATION PLAN
 STRATEGIC CONTEXT

Drawing Status
 DRAFT

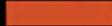
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Appendices

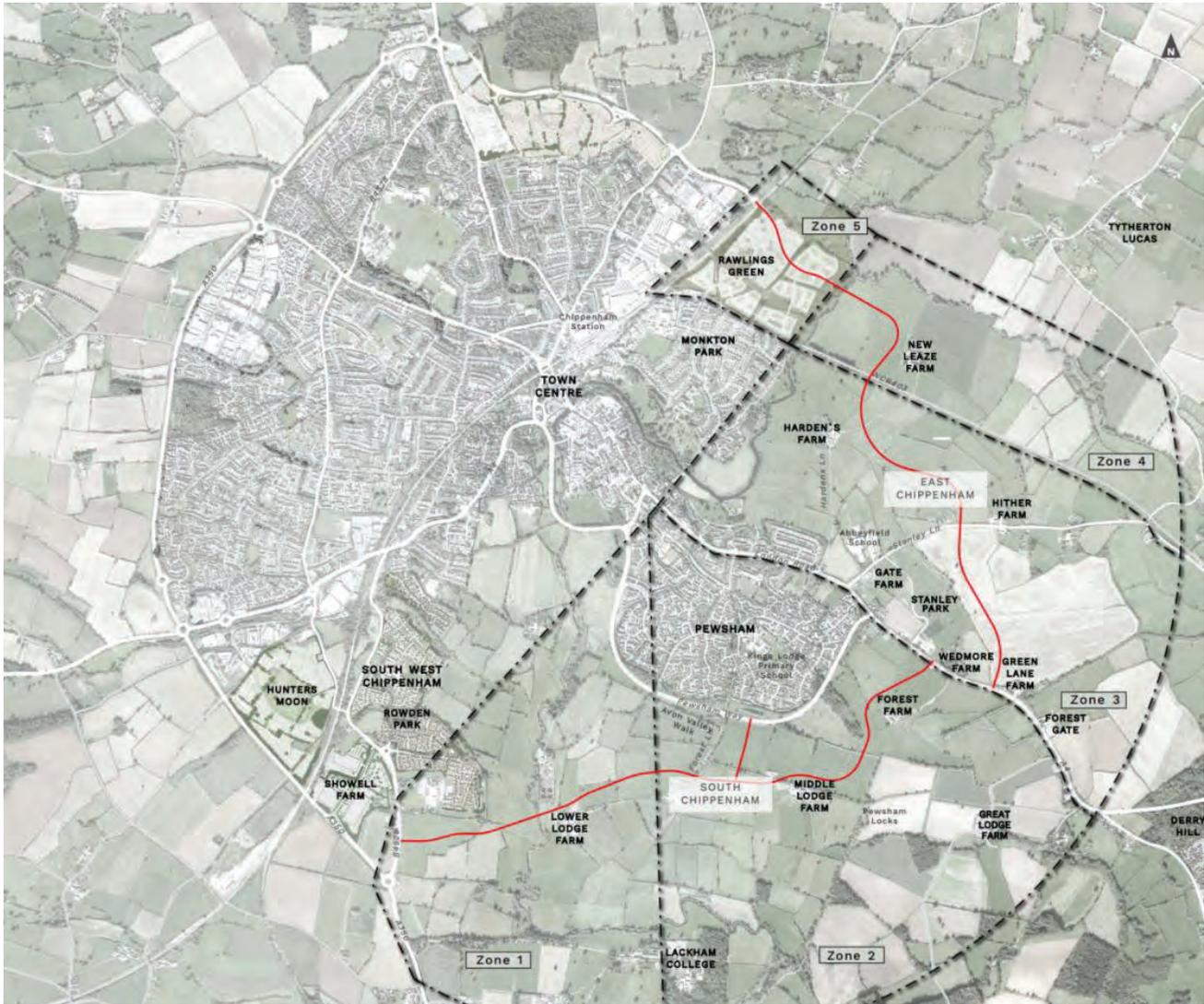
Appendix A: Proposed Distributor Road Alignment



-  Option A - Outer Route
-  Option B - Middle Route
-  Option C - Inner Route

Best fit option

- KEY
- Best Fit Distributor Road Option
 - Assessment Zone



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Appendix B: Options Assessment Data

9.3.2. Deliverability data

A review of the following data and mapping was undertaken to assess option deliverability using the following data sources:

- Environment
 - Flood data – Figure 9-5.
 - Ecology biodiversity reviews location of known habitat – Figure 9-6.
 - Heritage – Figure 9-7.
- Engineering
 - Refer to flood data – Figure 9-5. The area of the flood zone is important for determining the size of structure required to cross the zone.
- Land ownership
 - Majority landowners/developers (June 2020) – Figure 9-8.

Figure 9-5 - Option sift 1 - flood data

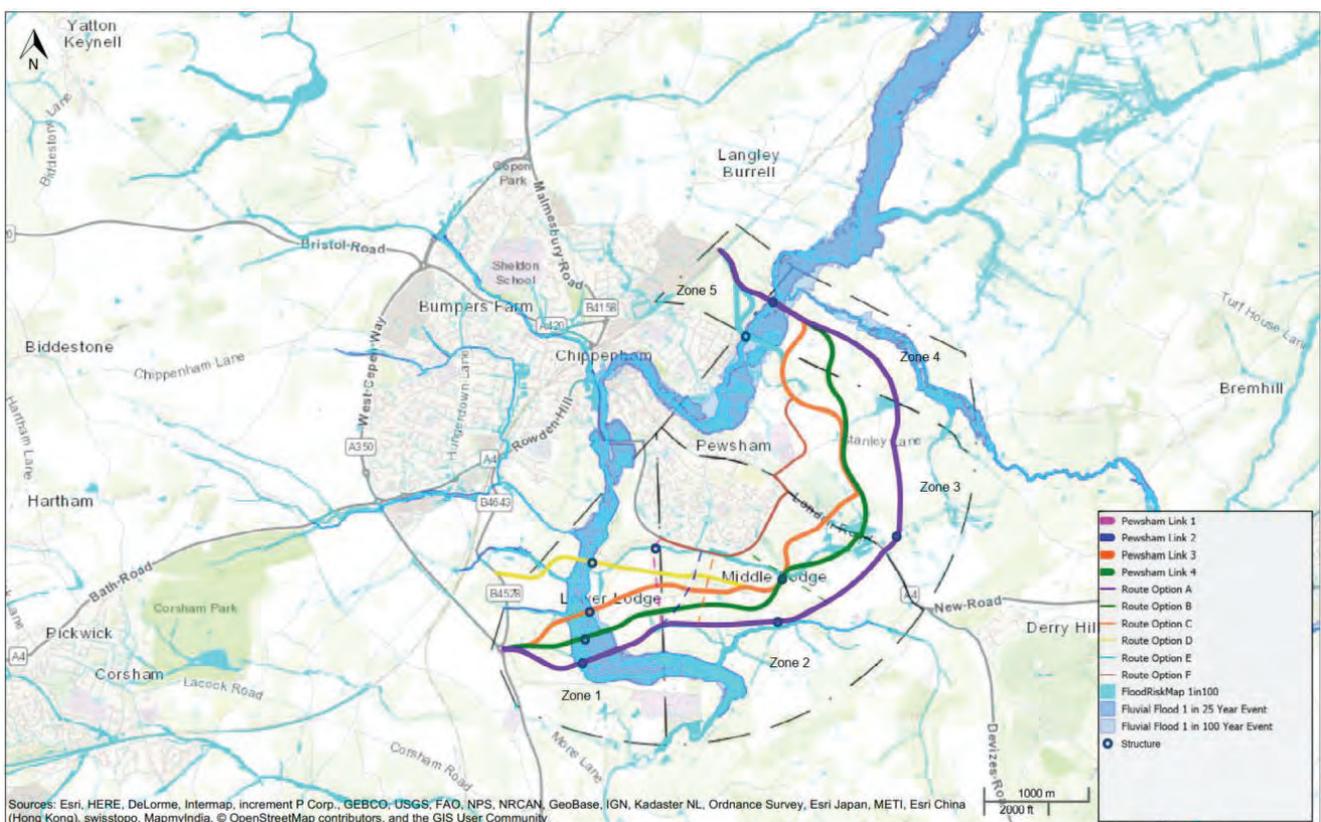


Figure 9-6 - Option sift 1 - biodiversity data

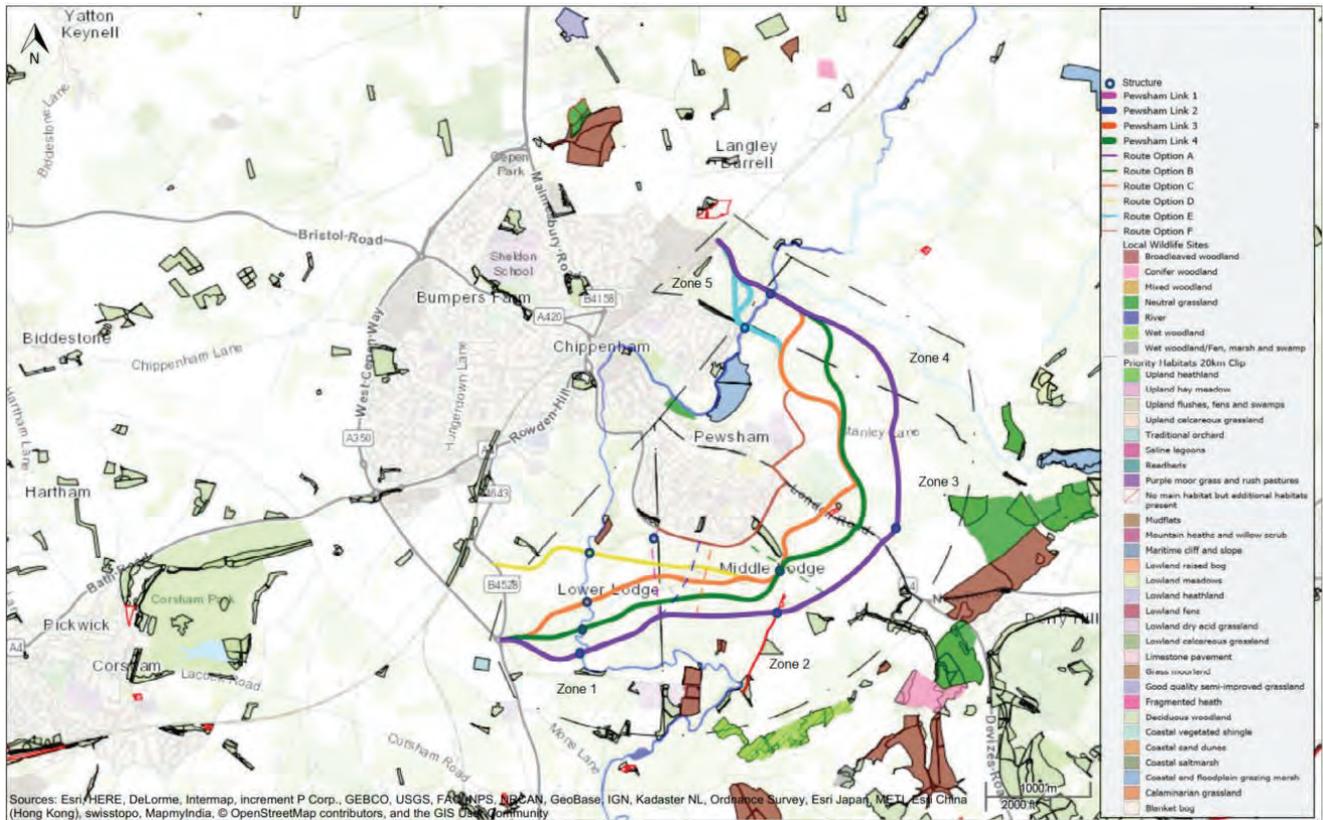
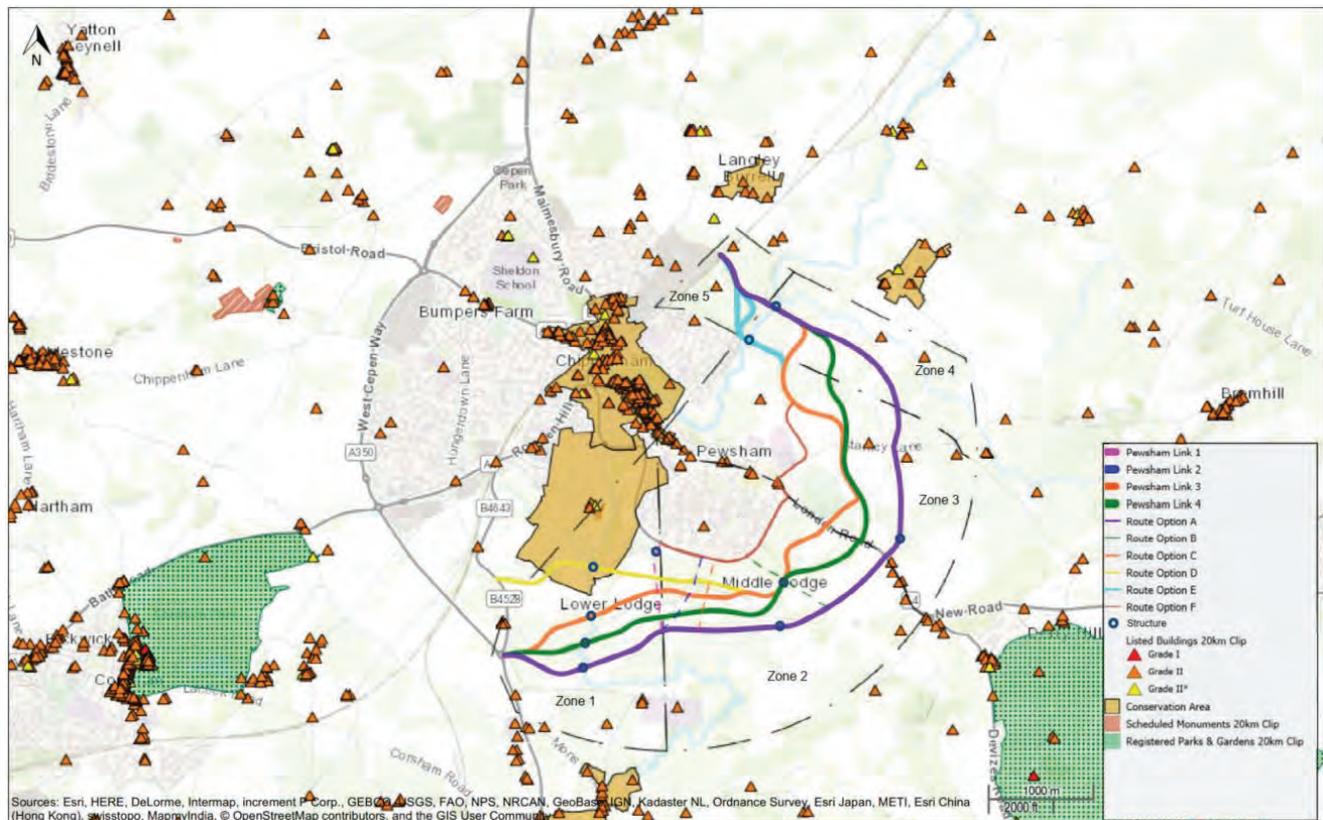


Figure 9-7 - Option Sift 1 - Heritage Data





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**Appendix 3: Initial Flood Risk Review Technical
Note (Jubb, February 2021)**



Title: Initial Flood Risk Review Technical Note

Date: 26th February 2021

1.0 Introduction

- 1.1 Jubb have been appointed by Bloor Homes to provide an initial review of flood risk to support the promotion of land to the west of Chippenham in the Wiltshire Local Plan.
- 1.2 The subject site is located on the western edge of Chippenham (refer to Figure 1), between the A350 and the A4 Bath Road. The site is approximately 77Ha in area and is currently used as agricultural fields and farmland. The site is bound by the A350 to the east, the A4 Bath Road to the south and adjacent agricultural fields to the west and north.

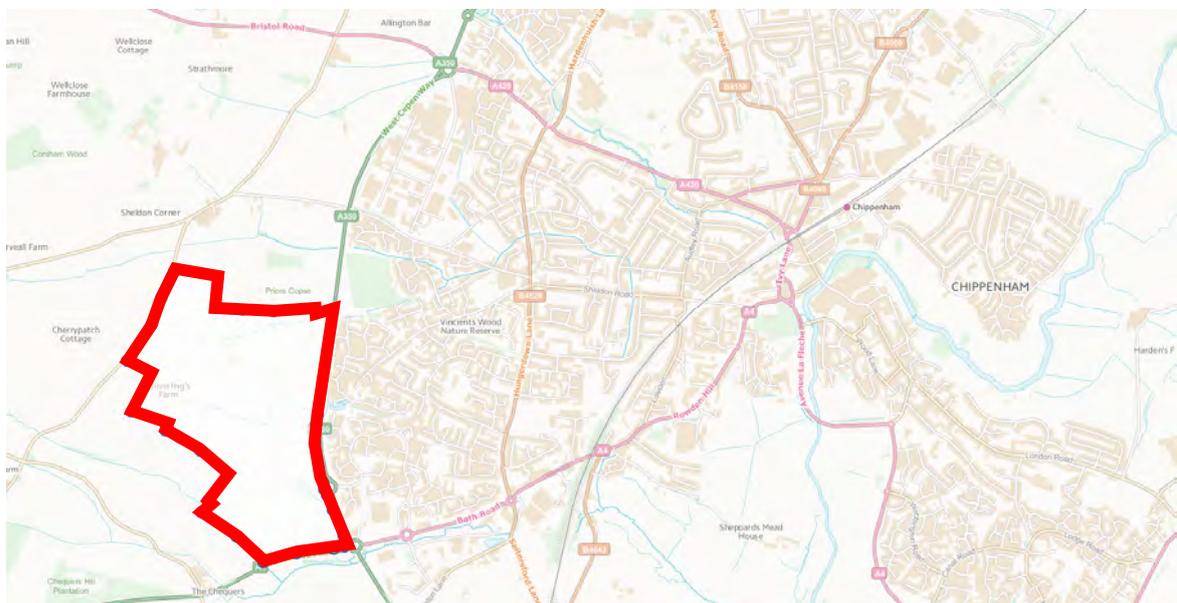


Figure 1 – Site Location Plan

- 1.3 The proposals consist of a mixed-use development of predominately residential uses with a local centre, community/ sports hub, school, business hub, transport infrastructure and areas of greenspace and landscaping.
- 1.4 The proposed site (Ref: 3666) was considered as part of the Wiltshire Local Plan Review – Chippenham Development Sites. As part of the site assessment the risk of flooding to the site was reviewed, with the site selection report concluding that the flood risk to the site should be considered as Medium.
- 1.5 It was considered that the risks to the site include surface water flooding in the north-east region adjacent to the A350, groundwater risk was identified as fairly consistent across the site and historic flooding which was recorded in the northern region of the site,
- 1.6 This technical note explores the primary sources of flooding to the site and identifies any constraints to the site, with potential mitigation or management measures recommended where necessary.

2.0 Flood Risk Review

2.1 Fluvial

2.1.1 The vast majority of the site is identified as lying outside of the fluvial flood risk zone according to the Environment Agency's published floodplain map (refer to Figure 2).

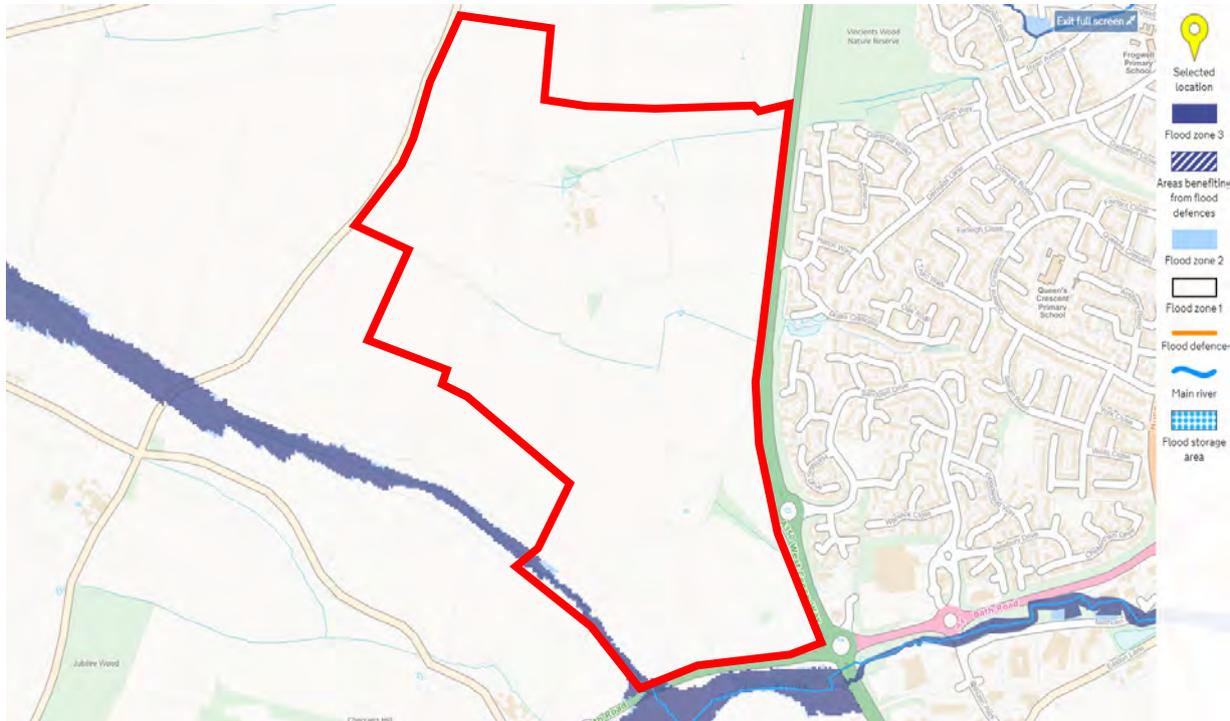


Figure 2 – Extract from Environment Agency Flood Map for Planning

2.1.2 The EA flood map indicates that the level of flood risk to this part of the site corresponds to Flood Zone 1 – Low Probability, this zone has less than a 1 in 1000-year annual probability of river or sea flooding.

2.1.3 The National Planning Policy Framework (NPPF) Planning Practice Guidance states that all types of development are suitable for this flood zone.

2.1.4 In the southern region of the site, a narrow band of Flood Zone 2 and 3 is shown running along the south-west boundary of the site.

2.1.5 These flood zones are classified as medium probability (Flood Zone 2) which is defined as an area with between 1 in 100 and 1 in 1000-year annual probability of river flooding, and high probability (Flood Zone 3) which is defined as an area with greater than a 1 in 100-year annual probability of river flooding.

2.1.6 The Flood Zone 2 and 3 extents are associated with the existing watercourse which runs along the south-west boundary of the site. These flood zones are shown contained within the watercourse channel and only encroach into the site by a minimal amount. It is proposed that the full extents of the development will be located within Flood Zone 1 and therefore be at low risk of fluvial flooding.

2.2 Overland & Surface Water Flooding

2.2.1 As shown on the EA risk of flooding from surface water map (refer to Figure 3), the site is predominately shown as an area at very low risk of overland and surface water flooding.

2.2.2 In the southern region of the site, a narrow band of flood risk is shown along the existing watercourse which runs along the south-western site boundary.

2.2.3 In the north-east region of the site, two small isolated areas of low-high risk of flooding are shown adjacent to the A350 on the eastern site boundary.

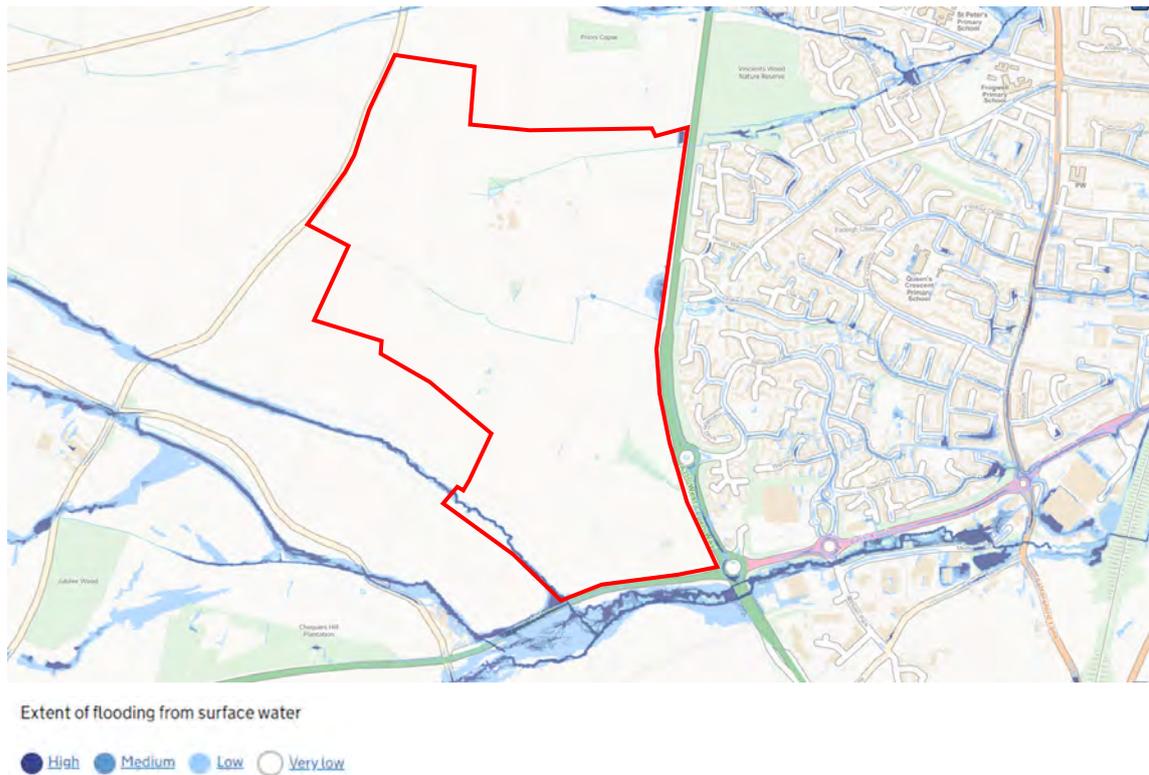


Figure 3 – Extract from Environment Agency Flood Risk from Surface Water Map

2.2.4 It appears that these areas shown at risk of flooding are caused by modelled flows being conveyed to localised low points due to the topography of the site. The existing levels of the A350 appear to be higher than the existing site levels in this area, which appears to result in flows being retained against the eastern site boundary as they are prevented from continuing to flow to the east.

2.2.5 It is anticipated that the development proposals including a new site wide drainage strategy will alleviate these areas of flood risk, with run-off from the site collected and conveyed to a suitable point of discharge.

2.2.6 Due to the topography of the site and the surrounding area, the site is protected from overland flooding from the north, east and south. To the west, levels of the adjacent fields fall in an easterly direction towards the site. However, it is anticipated that flows are intercepted and prevented from impacting the site due to the presence of existing drainage ditches which run adjacent to existing lane which bounds the site to the east.

2.2.7 It is therefore considered that flooding from surface water and overland flows does not pose a significant risk to the proposed development.

2.3 Flooding from Sewers

2.3.1 There is a very low risk of flooding from the existing public sewerage infrastructure impacting the proposed site due to the location of the existing apparatus and the topography of the surrounding area.

2.3.2 Wessex Water asset plans confirm there are no existing sewers located within the proposed site. The nearest sewers are located to the east of the site within the existing residential areas.

2.3.3 In the event of sewer incapacity or blockages occurring to the existing sewer network, flows would be conveyed to the east and away from the site due to the topography of the surrounding area and would therefore not impact the site.

2.4 Flooding from Groundwater

2.4.1 As part of the Wiltshire Council Strategic Flood Risk Assessment (SFRA) a groundwater flood map was produced which identifies the subject site within an area where there is the potential for shallow groundwater and consequently within an area where there is a risk of groundwater flooding.

2.4.2 The SFRA states that the understanding of the risks posed by groundwater flooding is limited and mapping of flood risk from groundwater is in its infancy. The SFRA map shows a significant area of west Chippenham to be at risk of groundwater flooding, which appears to correlate with the limestone bedrock underlying the site and the surrounding area.

2.4.3 Due to the topography of the site, it is anticipated that groundwater levels will vary across the site with shallower groundwater anticipated to be more prevalent in the lower lying areas. No ground investigation works have currently been undertaken across the site. However, available borehole data undertaken in close proximity to the site, to a depth of 4m below ground level, encountered groundwater at a depth of between 2-3mbgl.

2.4.4 The SFRA also states there are no records of flooding from groundwater occurring within the site or in the nearby vicinity.

2.4.5 Based on this initial information it is considered that flooding from groundwater does not pose a significant risk to the development. However, further onsite ground investigation including groundwater monitoring should be undertaken across the site to further assess the risk to the site. If shallow groundwater is encountered suitable mitigation/ management measures could be considered to limit any potential risk of flooding to the site.

2.5 Historic Flooding Events

2.5.1 The SFRA includes a detailed record and map of historic flooding events in Wiltshire going back as far as 1894. The map shows that a narrow section of recorded flood outline is shown in the north-east corner of the site. This previous flooding incident appears to have occurred between 1961 – 1970 and is associated with the small ordinary watercourse, known as Ladyfield Brook. This watercourse runs through the north-east region of the site, from Chiverling's Farm to the A350, before continuing to the south-east and converging with the Pudding Brook.

2.5.2 The records of historic flooding contained within the SFRA show there was a number of flooding events which affected Ladyfield Brook between the 1960's and 70's. These recorded events occurred a considerable time ago and there are no further records from the mid 70's onwards of flooding affecting the Ladyfield Brook.

2.5.3 It is therefore considered that since these historic flood events, improvements to flood defences and flood mitigation measures in the area have prevented similar flooding events from occurring within the site or the surrounding area since.

2.6 Other Sources of Flooding

2.6.1 No other sources of flood risk have been identified to the proposed site.

3.0 Conclusions

- 3.1 This initial review of flood risk to the subject site has considered a range of potential sources of flooding including fluvial, surface water, overland flows, sewers and groundwater.
- 3.2 Historical flooding events have also been investigated to obtain a better understanding of these events and the potential implications on the site in the future.
- 3.3 It is proposed that the full extents of the development will be located within Flood Zone 1 and therefore be at low risk of fluvial flooding.
- 3.4 The risk of flooding from other sources including surface water, overland flows, groundwater and sewers is considered low.
- 3.5 The development proposals including the site drainage strategy will be designed in a manner that does not increase the risk of flooding to the site or the surrounding area.
- 3.6 Based on this review of flood risk to the site and the various factors considered, the overall risk of flooding to the development should be considered as low or can be suitably managed.

**Appendix 4: Initial Heritage Appraisal (Turley,
February 2021)**

Initial Heritage Appraisal Land West of Chippenham

February 2021

Contents

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Appendix 1: Heritage Asset Plan

Appendix 2: Zone of Theoretical Visibility

Client
Bloor Homes
Our reference
BLOA3036

February 2021

1. Introduction

- 1.1 This Initial Heritage Appraisal (the 'Appraisal') is prepared by Turley Heritage on behalf of Bloor Homes in relation to Land West of Chippenham (the 'Appraisal Site'). The purpose of the Appraisal is to provide an initial understanding of the significance of nearby heritage assets and the key heritage considerations that should be taken into consideration in promoting the development of the Appraisal Site.
- 1.2 This Appraisal is structured as follows:
- Section 2 of the report provides an overview of the Appraisal Site and its historic development.
 - Section 3 identifies the heritage assets within or proximate to the Appraisal Site with potential to be affected.
 - Section 4 provides a broad assessment of the significance and setting of nearby heritage assets.
 - Section 5 of the report provides an overview of the relevant heritage legislation, national and local planning policy and guidance.
 - Section 6 concludes with key heritage considerations to be taken into consideration as part of the emerging proposals.
- 1.3 The Appraisal has been prepared using existing published information, initial archival research and a search of the Wiltshire and Swindon Historic Environment Record (HER) via Heritage Gateway.

2. The Appraisal Site

Context

- 2.1 The Appraisal Site (Figure 2.1) consists of a series of agricultural fields that abut the western settlement edge of Chippenham and residential area of Frogwell. It is separated from the built edge of the settlement by the A350. At the centre of the Appraisal Site but outside the red line boundary is Chiverlins House and Farm.



Figure 2.1: Satellite View of the Appraisal Site (2019)¹

Overview of Historic Development

- 2.2 The Appraisal Site is partially illustrated on Andrew's and Dury's 1773 Map of Wiltshire (Figure 2.2) which shows it as consisting of open land set around individual farmsteads and manor houses including Cheeveling (later 'Cheverdens' and 'Chiverlins'), Pilsmore

¹ Google (2021) Google Earth: Chippenham

(later 'Pipsmore') and Derrits (later 'Derriards'). To the north west is the former medieval settlement of Sheldon and manor house. The 18th century is noted as a fairly prosperous time for farming in this area, as evidenced by many farmhouses being built or rebuilt (including those set out above).² Farming was mixed with the emphasis on stock and dairy and with Wiltshire cheese made in the area.³



Figure 2.2: Andrew's and Dury's 1773 Map of Wiltshire⁴

- 2.3 The Appraisal Site is illustrated in more detail on the 1885 Ordnance Survey map (Figure 2.3) which shows the aforementioned farmsteads and Mynte Farm to the south. With the exception of field boundaries, there are no discernible features within

² Wiltshire Council (2021) Wiltshire Community History: Chippenham [URL: <https://history.wiltshire.gov.uk>]
³ Wiltshire Council (2021) Wiltshire Community History: Chippenham [URL: <https://history.wiltshire.gov.uk>]
⁴ Wiltshire Council (2021) Wiltshire Community History: Chippenham [URL: <https://history.wiltshire.gov.uk>]

the Appraisal Site. In the surrounding area, the map shows Upper and Lower Sheldon (with Sheldon Manor) to the north west, tree plantations to the north (Horse Leaze and Vincients Wood), Derriards House with its tree-lined avenue to the east and Corsham Court and its parkland to the south west.

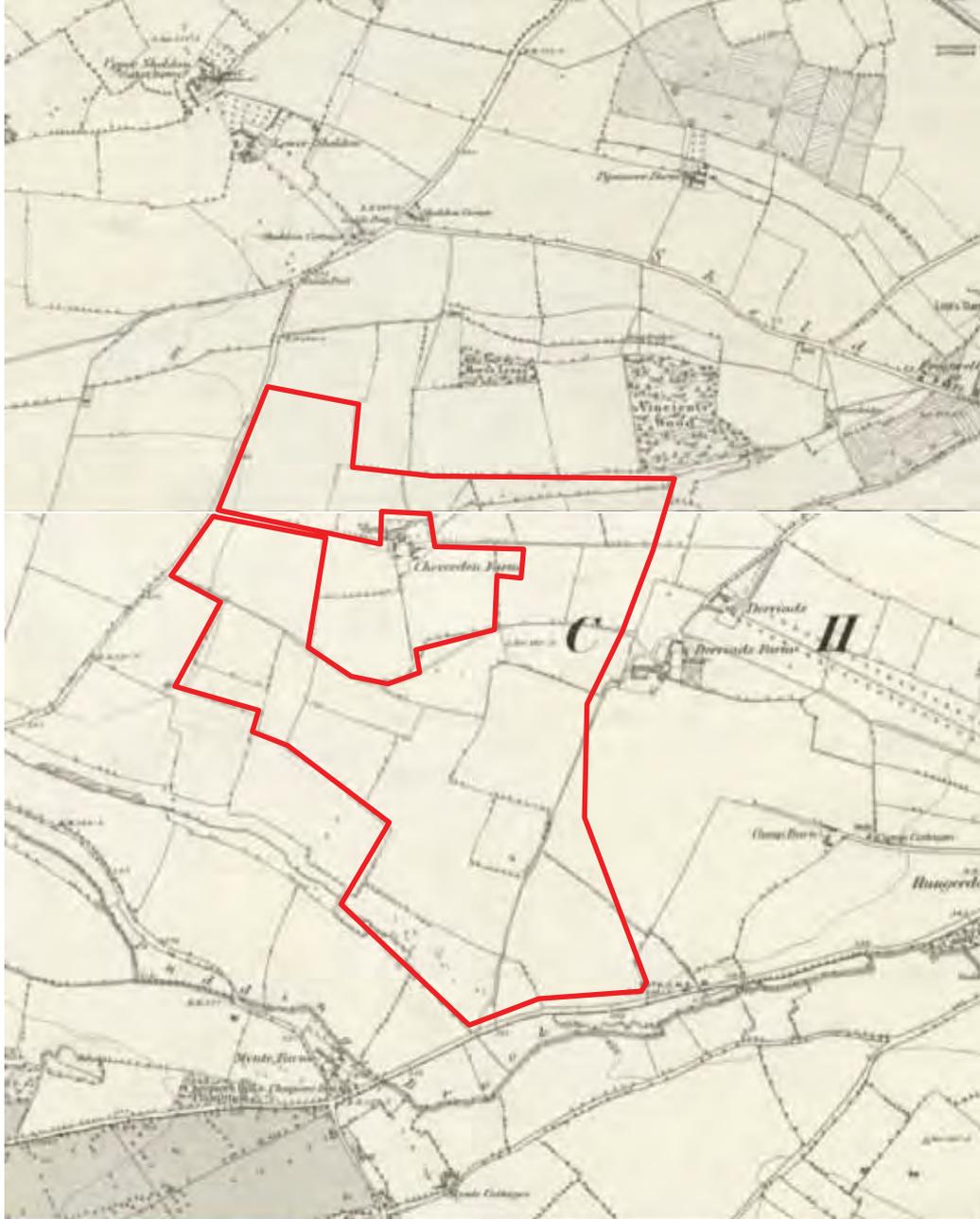


Figure 2.3: 1885 Ordnance Survey Map

- 2.4 The Appraisal Site formed part of the civil parish of 'Chippenham Without' (Figure 2.4) which was created by the Local Government Act of 1894, which divided the ancient parish of Chippenham into the municipal borough of Chippenham (Chippenham

Within) and Chippenham Without.⁵ Chippenham Without is described as mainly comprising farmland to the west of the town”.⁶

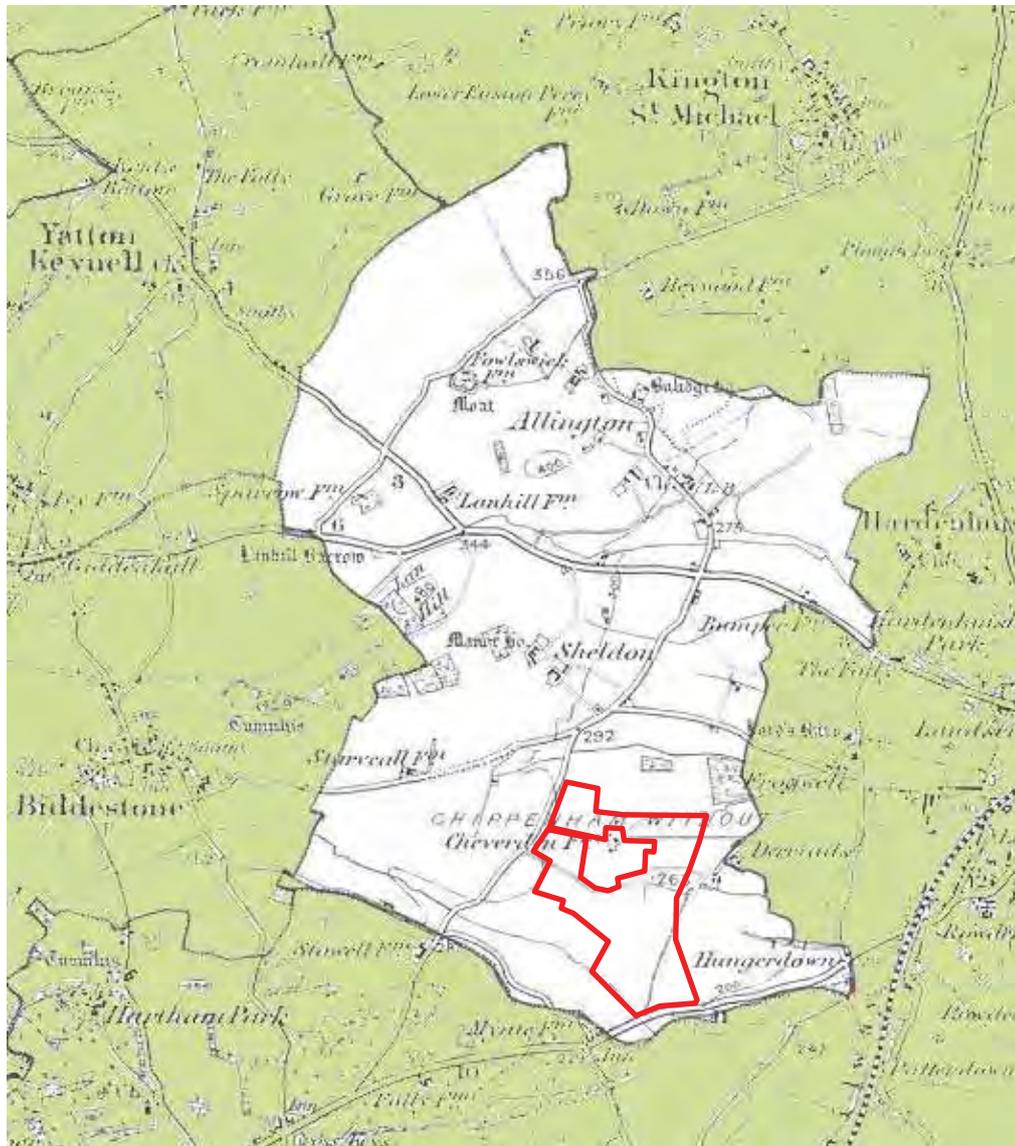


Figure 2.4: 1896 Map of the Civil Parish of Chippenham Without⁷

2.5 There are no significant changes to the Appraisal Site or the surrounding area by the early 20th century with the only noticeable change is that the grounds around Derriads House and Farm now laid out as parkland. Similarly, there were no changes to the Appraisal Site or the surrounding area by the 1938 Ordnance Survey map (Figure 2.5).

⁵ Wiltshire Council (2021) Wiltshire Community History: Chippenham [URL: <https://history.wiltshire.gov.uk>]
⁶ Wiltshire Council (2021) Wiltshire Community History: Chippenham [URL: <https://history.wiltshire.gov.uk>]
⁷ Wiltshire Council (2021) Wiltshire Community History: Chippenham [URL: <https://history.wiltshire.gov.uk>]

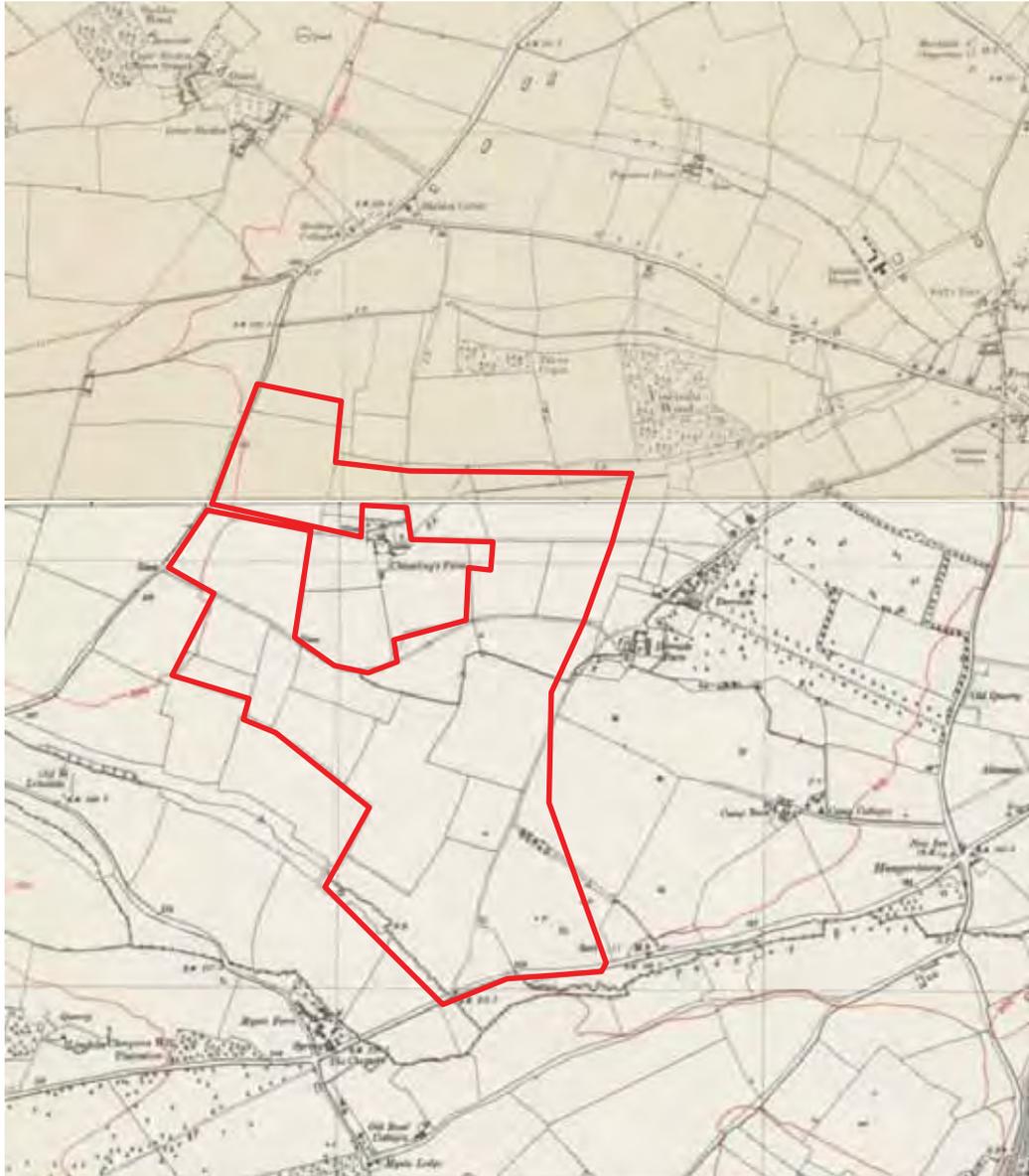


Figure 2.5: 1938 Ordnance Survey Map

- 2.6 From the mid-20th century onwards, the land to the east side of the Appraisal Site was gradually developed as part of the expanding settlement of Chippenham and the construction of the A350. This included the redevelopment of the grounds around Derriads House and Farm with modern residential development. As found today, the Appraisal Site remains as open agricultural fields.

3. The Heritage Assets

3.1 The NPPF (2019) defines a heritage asset as:

“A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest.”⁸

3.2 The setting of a heritage asset is defined by the NPPF as:

“The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral.”⁹

Designated Heritage Assets

3.3 All designated heritage assets within a 2.5km Study Area from the boundary of the Appraisal Site have been identified as illustrated on the Heritage Asset Plan at **Appendix 1**. These include:

- Listed Buildings;
- Conservation Areas;
- Registered Parks and Gardens; and
- Scheduled Monuments

3.4 A Zone of Theoretical Visibility (ZTV) (**Appendix 2**) has been prepared based on the emerging proposals (built form only) to understand those with potential to be affected by future development of the Appraisal Site. As illustrated on the ZTV, the majority are unlikely to experience any effects arising from the redevelopment of the Appraisal Site due to the following reasons:

- The nature and scope of the emerging proposals;
- The proximity of heritage assets to the Appraisal Site;
- The degree of inter-visibility between the heritage assets and the Appraisal Site taking into consideration, for instance, changes in topography as well as interposing townscape and landscape features (informed by the ZTV);
- The significance of the relevant heritage assets and the contribution made by their setting including any historic or functional relationships; and

⁸ MHCLG (2019) National Planning Policy Framework (NPPF) – Annex 2: Glossary

⁹ MHCLG (2019) National Planning Policy Framework (NPPF) – Annex 2: Glossary

- The existing residential context that characterises their setting and in which the redevelopment of the site would also be experienced.

3.5 The designated heritage assets with the potential to be affected, as based on the ZTV, are set out below and broadly assessed within this report.

Table 3.1: Designated heritage assets with potential to be affected

| Asset Type and HAP Ref | Name | Grade | Date of Designation |
|----------------------------|---------------------------------|-------|---------------------|
| Listed Building (53) | Chiverlins Farmhouse | II | 09 December 1985 |
| Listed Building (37) | Mynte Farmhouse | II | 01 August 1986 |
| Listed Building (38) | Cartshed and Loft at Mynte Farm | II | 01 August 1986 |
| Listed Building (324) | Barn at Mytne Farmhouse | II | 01 August 1986 |
| Listed Building (39) | Chequers Farmhouse | II | 01 August 1986 |
| Listed Building (40) | Old Road Cottage | II | 01 August 1986 |
| Listed Building (46) | Barn Range at Starveall Farm | II | 09 December 1985 |
| Listed Building (188) | Starveall Farmhouse | II | 09 December 1985 |
| Listed Building (33) | Stowells Farmhouse | II | 01 August 1986 |
| Listed Building (60) | Sheldon Farmhouse | II | 09 December 1985 |
| Registered Park and Garden | Corsham Court | II* | 01 September 1987 |
| Scheduled Monument | Medieval Settlement of Sheldon | n/a | 15 February 1999 |

Non-Designated Heritage Assets

3.6 The NPPF identifies that heritage assets include both designated heritage assets and assets identified by the local planning authority (including local listing).

3.7 GPA 2 produced by Historic England (2015) states that:

“Non-designated heritage assets include those that have been identified in a Historic Environment Record, in a local plan, through local listing or during the process of considering the application.”

3.8 A search of the Wiltshire and Swindon Historic Environment Record via Heritage Gateway¹⁰ in February 2021 has not identified any other buildings/structures in the surrounding area which have the potential to be considered non-designated heritage assets under Historic England guidance.

¹⁰ Heritage Gateway (2021) Wiltshire & Swindon HER [URL: <https://www.heritagegateway.org.uk>]

4. Broad Assessments of Significance

Significance and Special Interest

- 4.1 The NPPF (2019) defines the significance of a heritage asset as:

“The value of a heritage asset to this and future generations because of its heritage interest. That interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset’s physical presence, but also from its setting.”¹¹

Listed Buildings

- 4.2 Listed buildings are defined as designated heritage assets that hold architectural or historic interest. The principles of selection for listed buildings are published by the Department of Digital, Culture, Media and Sport and supported by Historic England’s Listing Selection Guides for each building type.

Scheduled Monuments

- 4.3 A Scheduled Monument is defined by the Ancient Monuments and Archaeological Areas Act 1979 as any structure, or site of a structure, above or below ground, which is considered by the Secretary of State to be of public interest by reason of its historic, architectural, traditional, artistic or archaeological importance.

Registered Parks and Gardens

- 4.4 The main purpose of the Register is to identify designed landscapes of special historic interest. Whilst there is no additional statutory protection arising from inclusion on the register it is a ‘material consideration’ in the planning process, meaning that planning authorities must consider the impact of any proposed development on the landscapes’ special character. In considering the potential special historic interest of a park or garden the principal overarching consideration is age and rarity.
- 4.5 To assist with consideration of potential special historic interest Historic England has produced a series of selection guides which set out in more detail the approaches to designating designed landscapes.

Setting

- 4.6 The NPPF (2019) defines the setting of a heritage asset as:

“The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral.”

¹¹ MHCLG (2019) National Planning Policy Framework (NPPF) – Annex 2: Glossary

- 4.7 Historic England has published guidance¹² in respect of the setting of heritage assets, providing detail on understanding setting and the associated assessment of the impact of any changes. The guidance confirms that setting is not a heritage asset, nor a heritage designation, rather its importance lies in what it contributes to the significance of the relevant heritage asset itself.

Assessments

- 4.8 The following broad assessments of significance have been prepared using existing published information, initial archival research and a search of the Wiltshire HER.

Chiverlins Farmhouse (Grade II Listed)

Summary of Significance and Setting

- 4.9 Chiverlins holds significance as a mid-18th century farmhouse (with earlier origins) designed in a broadly symmetrical composition of two storeys with projecting porch and consistent window openings. It is constructed from rubble stone with rough render and a stone tile roof. The building is decorated with moulded stone surrounds and ashlar pediment to the porch and projecting chimneystacks.
- 4.10 The setting of Chiverlins Farmhouse is defined to the immediate north, west and east by a tree plantation and a large pond, noted as a 'moat' on historic maps but sources¹³ indicate this was not likely. To the south are modern agricultural buildings and a modern residential building. The surrounding area consists of open agricultural fields (forming the Appraisal Site). The listed building is primarily experienced from its immediate south (the lane and two fields to the south) where the farmhouse and its context and historic use is appreciable. Due to topography, intervening buildings and tree plantation, the listed building is not readily experienced from the remainder of the surrounding area.

Contribution made by the Appraisal Site to Significance

- 4.11 The Appraisal Site principally consists of open agricultural fields which surround the listed building. Initial research suggests that parts of the Appraisal Site may have originally had a visual, functional and historic relationship with the listed building, forming part of its original agricultural landholdings. This relationship remains extant with the Appraisal Site still in use as agricultural fields and contributes towards the significance of the listed building.
- 4.12 The agricultural fields to the west and east, and to a lesser extent south of the Appraisal Site emphasise the former rural character of the farmstead and allow for an understanding of its role and function as a traditional farmstead. The extent of mature trees to the north limits the visual relationship between the northern part of the Appraisal Site and the listed building.

¹² Historic England (2017) Good Practice Advice Note 3: The Setting of Heritage Assets
¹³ Historic England (2021) Pastscape: Chiverlins Farmhouse (Monument No: 208402)

Mynte Farmhouse (Grade II Listed), Barn (Grade II Listed) and Cartshed and Loft (Grade II Listed)

Summary of Significance and Setting

- 4.13 The listed building holds significance as a mid-18th century farmhouse (with 17th century origins and later 19th century additions) designed in an asymmetrical composition of two storeys, in an L-shaped plan, with a mix of architectural details including mullioned windows, gables and large chimneystacks. It is constructed from rubble stone with rough render, ashlar dressings and a stone tile roof.
- 4.14 Both the Barn at Mynte Farm and the Cartshed and Loft are of significance as early 19th century agricultural buildings constructed from rubble stone with rough render, ashlar dressings and a stone tile roof. Both buildings are two storeys and include various details such as gables, arched openings and doorways. The Cartshed and Loft are noted in the list entry¹⁴ as being included for group value.
- 4.15 The setting of the listed buildings is largely defined by the road to the south, Bath Road to the east and a small brook/river to the north. The surrounding area largely consists of open fields, concealed or filtered by trees and planting with the topography rising to the north and south. They are collectively experienced from the road where their relationship and group value with one another is best appreciated. The mature trees and planting forms a backdrop to the building in views from the south. They are largely screened from view to the east by Chequers Farmhouse and west by mature planting.

Contribution made by the Appraisal Site to Significance

- 4.16 The Appraisal Site forms part of the wider agricultural context of the listed buildings but is not readily appreciable due to the topography of the land and existing mature planting. There is therefore a limited visual relationship. There are no known historic or functional associations between the listed buildings and the Appraisal Site.

Chequers Farmhouse (Grade II Listed)

Summary of Significance and Setting

- 4.17 Chequers holds significance as an early 19th century farmhouse of two storeys constructed from limewashed rubble stone and a stone tile roof. There is a consistent and ordered arrangement to the windows and doors on the principal elevation. The building is decorated with simple detailing including stone surrounds and a projecting overlight. To the rear is an L-shaped rear wing dating from the late 19th century.
- 4.18 The setting of the listed building is defined by Mytne Farmhouse (and associated buildings) to the west, the road to the south, Bath Road to the east and a small brook/river to the north. The surrounding area largely consists of open fields, largely concealed by trees and planting with the topography rising to the north and south. Chequers Farmhouse is primarily and directly experienced from Bath Road where it's architectural detailing and group value with other buildings and structures. Due to the topography, intervening planting and the orientation of the roads, there are limited areas in which to experience the listed building.

¹⁴ Historic England (1986) List Entry for the Cartshed and Loft

Contribution made by the Appraisal Site to Significance

- 4.19 The Appraisal Site forms part of the wider agricultural context of the listed building but is not readily appreciable due to the topography of the land and existing mature planting. There is therefore a limited visual relationship. There also does not appear to be any known historic or functional associations between the listed buildings and the Appraisal Site.

Old Road Cottage (Grade II Listed)

Summary of Significance and Setting

- 4.20 Old Road Cottage holds significance as a late 17th century farmhouse of two storeys constructed from rubble stone and a stone tile roof with end wall stacks. The building is double fronted with recessed ovolo-moulded mullion windows and hoodmoulds. The roof includes two gabled dormers. To one side is a rear wing with similar window and hoodmould detailing.
- 4.21 The setting of the listed building is characterised by its domestic garden enclosed by mature hedgerows and trees. In the surrounding area are open agricultural fields to the north, east and south. To the west is Corsham Court Registered Park and Garden. The building is primarily experienced in views from the private lane it fronts with the wider area to the north forming part of the backdrop, including the Appraisal Site. Due to the extent of mature trees and the topography of the land, there are limited views of the building from the surrounding area.

Contribution made by the Appraisal Site to Significance

- 4.22 The Appraisal Site forms part of the wider agricultural context of the listed building and is partially experienced in glimpsed and filtered views from the south. The site reinforces the rural character of the listed building and makes a contribution towards its significance as an isolated farmhouse. There are no known historic or functional associations between the site and the listed building.

Stowells Farmhouse (Grade II Listed)

Summary of Significance and Setting

- 4.23 Stowells Farmhouse holds significance as a late 18th century farmhouse constructed from rubble stone and a stone tile roof with end wall stacks. It is two storeys with mullion windows and decorated with flush ashlar quoining, first floor banding and two hipped dormers. The south west corner includes a stone inscribed 'TR 1774'.
- 4.24 The setting of the listed building is characterised by its domestic garden to the west (enclosed by mature planting) and modern and traditional agricultural buildings to the east. It is partially setback from the road to the south east and overlooks open agricultural fields, beyond which are the Appraisal Site and the edge of Chippenham. In the surrounding area are open agricultural fields to all sides. The building is primarily experienced in views from the road to the west where its function as a farmhouse, its architectural detailing and grouping with outbuildings can be appreciated together. Due to the raised topography of the land and open character of the field in front, the building has increased prominence from the south east.

Contribution made by the Appraisal Site to Significance

- 4.25 The Appraisal Site forms part of the wider agricultural context of the listed building and is partially experienced in glimpsed and filtered views from the south, away from Stowells Farmhouse. The site reinforces the rural character of the listed building and makes a contribution towards its significance as an isolated farmhouse. There are no known historic or functional associations between the site and the listed building.

Starveall Farmhouse (Grade II Listed) and Barn Range (Grade II Listed)

Summary of Significance and Setting

- 4.26 Starveall Farmhouse holds significance as an early 18th century farmhouse constructed from rubble stone and a stone tile roof with tall end wall stacks of ashlar. It is two storeys with three bays mullion windows and decorated with flush ashlar quoining (to front only) and stopped cyma-moulded stone mullion windows, dripstones and stone porch. The Barn Range at Starveall Farmhouse is of the same date and constructed utilising the same materials. It is decorated with flush quoins and projecting east side gabled cart entry with sundial finial. The list entry notes that the open-bay range to the east is 'not of special interest'.¹⁵
- 4.27 The setting of the listed buildings is characterised by a domestic garden to the front and side and a more informal courtyard to the north, enclosed by the barn range. It is set back from Chippenham Lane with a boundary wall and tall mature planting which screens much of the building. The surrounding area largely consists of open fields, largely concealed by mature hedgerows to the south. They are collectively experienced from within the eastern side of Chippenham Lane where their relationship and group value with one another is best appreciated. Their architectural detailing is experienced in more close range views from within the private garden.

Contribution made by the Appraisal Site to Significance

- 4.28 As with others, the Appraisal Site forms part of the wider agricultural context of the listed building but is not readily appreciable due to the extent of intervening planting to Chippenham Lane and the enclosed character and setting of the listed building. There is a limited visual relationship between the site and Starveall Farmhouse. There are no known historic or functional associations between the listed buildings and the Appraisal Site.

Sheldon Farmhouse (Grade II Listed)

Summary of Significance and Setting

- 4.29 Sheldon Farmhouse holds significance as a late 18th century farmhouse constructed from rubble stone and a stone tile roof with end wall stacks to both the main house and southern extension. It is two storeys (with attic) with a double fronted elevation with chamfered moulded window surrounds to each floor and central moulded flush doorcase with 6-panel door. The front doorcase has an inscription of '1785' and an Ashlar Tudor-style gabled porch dated 1860 with Methuen arms. The list entry notes that later extensions are '*not of special interest*'.¹⁶

¹⁵ Historic England (1985) List Entry for the Barn Range at Starveall Farmhouse

¹⁶ Historic England (XXXX) List Entry for Sheldon Farmhouse

- 4.30 The setting of the listed building is defined by its domestic garden to the south east (enclosed by mature planting) and modern and traditional agricultural buildings to the south west, north west and north east. In the surrounding area are open agricultural fields to the west, south and east. To the north is Sheldon Manor (Grade I Listed) and its Registered Park and Garden (Grade II). The building is primarily experienced from within its immediate grounds where its function as a farmhouse, its architectural detailing and grouping with outbuildings can be appreciated together. There are glimpsed and kinetic views of the farmhouse along the tree-lined avenue from the south east.

Contribution made by the Appraisal Site to Significance

- 4.31 The Appraisal Site forms part of the wider agricultural context of the listed building but is not readily appreciable due to the distance, extent of intervening planting and buildings and the enclosed character and setting of the listed building. There is a limited visual relationship between the site and Sheldon Farmhouse. There are no known historic or functional associations between the listed buildings and the Appraisal Site.

Corsham Court Registered Park and Garden (Grade II* Listed)

Summary of Significance and Setting

- 4.32 Corsham Court Registered Park and Garden consists of a predominantly mid-18th century parkland associated with the country house known as Corsham Court (Grade I Listed), which both have earlier medieval origins. It occupies approximately 188 hectares and is situated immediately to the east of the town of Corsham. The park is bounded by the A4 between Bath and Chippenham to the north and farmland to the east.
- 4.33 The significance of the parkland is derived from its medieval origins and connections with Corsham Court and its designs by Lancelot Capability Brown in c.1760 and later by Humphrey Repton in c.1800. In the 19th century, the parkland was extended to the north of the A4 but has since returned to farmland. There are numerous approaches to the house, principally via Corsham village, Mynte's Wood to the east and Lacock Road to the south. The pleasure grounds are situated immediately around the house with the remainder of the parkland separated by a ha-ha. The parkland to the north east, closest to the Appraisal Site, is less-sensitive due to later alterations and the diversion of Bath Road in the 19th century.

Contribution made by the Appraisal Site to Significance

- 4.34 The Appraisal Site forms part of the wider agricultural context of the registered park garden and is partially experienced in glimpsed and filtered views from limited areas to the north east corner of the park. The site forms part of the wider verdant and agricultural character of the park albeit this is limited by intervening buildings and mature planting. The appreciation from this area is partially diminished by later changes to the parkland and noise of the A4. There are no known historic or functional associations between the site and the registered park and garden.

Medieval Settlement at Sheldon Scheduled Monument

Summary of Significance and Setting

- 4.35 The medieval settlement at Sheldon is situated on a south east facing slope to the west of Sheldon Manor affording views over the low lying clay vale towards Salisbury Plain. The scheduling entry notes that it is *“linear in plan and two distinct centres of occupation can be identified”*. The medieval village is well preserved and is a good example of its type displaying particularly diverse and well defined features. It does not seem to have been ploughed since the village disappeared.
- 4.36 The setting of the medieval settlement is defined by Sheldon Wood, Sheldon Manor and the surrounding agricultural fields. The rural setting of the asset has a resonance with the former character of the setting of the settlement.

Contribution made by the Appraisal Site to Significance

- 4.37 The northern part of the Appraisal Site makes a minor contribution to the scheduled monument by being part of the open and rural landscape in which the site is experienced. It does not however make a discernible contribution to an understanding of the medieval settlement with the exception of its rural location. The remainder of the site makes no contribution to the significance of the scheduled monument.

5. Overview of Heritage Legislation, Planning Policy and Guidance

- 5.1 Below is an overview of the relevant heritage legislation, national and local planning policy and guidance.

Legislation

- 5.2 Under Section 66 of **The Planning (Listed Buildings and Conservation Areas) Act 1990**, the Local Planning Authority, in considering whether to grant planning permission for development which affects a listed building or its setting, has a statutory duty to have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.
- 5.3 Case law has confirmed that Parliament's intention in enacting section 66(1) was that decision-makers should give "considerable importance and weight" to the desirability of preserving the special interest and setting of listed buildings, where "preserve" means to "to do no harm". The presumption is therefore that development proposals should not give rise to harm to the special interest of a listed building.

National Planning Policy

- 5.4 The **National Planning Policy Framework (NPPF) (2019)** requires that great weight is given to the conservation of designated heritage assets and this reflects the statutory duty of the 1990 Act with respect to listed buildings and conservation areas. Conservation is defined by the NPPF as the process of maintaining and managing change to heritage assets in ways that sustain and where appropriate, enhance their significance.
- 5.5 Paragraph 192 of the NPPF elaborates that local planning authorities should take account of the desirability of sustaining and enhancing the significance of heritage assets, putting them into viable uses consistent with their conservation, as well as the desirability of new development making a positive contribution to local character and distinctiveness.
- 5.6 Paragraph 193 requires when considering the impact of a Proposed Development on the significance of a designated heritage asset, that great weight should be given to the asset's conservation and the more important the asset, the greater that weight should be. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. As heritage assets are irreplaceable, any harm or loss requires clear and convincing justification.
- 5.7 Paragraph 195 states that where a Proposed Development will lead to substantial harm to or total loss of significance of a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm and or loss is necessary to achieve substantial benefits that outweigh that harm or loss, or all of the following apply:

- *“the nature of the heritage asset prevents all reasonable uses of the site; and*
- *no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and*
- *conservation by grant-funding or some form of charitable or public ownership is demonstrably not possible; and*
- *the harm or loss is outweighed by the benefit of bringing the site back into use”*

5.8 Paragraph 196 requires that where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use.

5.9 Paragraph 200 requires local planning authorities to look for opportunities for new development within the setting of heritage assets to better reveal their significance. With respect to setting, the NPPF notes that proposals that preserve those elements of setting that make a positive contribution to or better reveal the significance of the asset should be treated favourably.

National Guidance

5.10 Historic England has published guidance ‘**Good Practice Advice Note 3: The Setting of Heritage Assets (2017)**’ which provides detail on understanding setting and the associated assessment of the impact of any changes. The guidance confirms that setting is not a heritage asset, nor a heritage designation, rather its importance lies in what it contributes to the significance of the relevant heritage asset itself.¹⁷

5.11 The guidance also notes that where the significance of a heritage asset has been compromised in the past, by unsympathetic development affecting its setting, consideration still needs to be given to whether additional change will further detract from, or can enhance, the significance of the asset. Furthermore, it states that: *“Negative change could include severing the last link between an asset and its original setting”*.¹⁸

5.12 Historic England identifies various options for reducing the harm arising from a development. This can include the relocation of a development, changes to its design and the creation of effective long-term visual screening. Historic England further state that good design may reduce or remove the harm, or provide enhancement, and that design quality may be the main consideration in determining the balance of harm and benefits.¹⁹

5.13 Whilst not planning policy, national **Planning Practice Guidance (2019)** provides a clear indication of the Government’s approach to the application of national policy

¹⁷ Historic England (2017) Good Practice Advice Note 3: The Setting of Heritage Assets

¹⁸ Historic England (2017) Good Practice Advice Note 3: The Setting of Heritage Assets

¹⁹ Historic England (2017) Good Practice Advice Note 3: The Setting of Heritage Assets

contained in the NPPF. Where there is conflict between the guidance in the PPG and earlier documents the PPG will take precedence.

Local Planning Policy

- 5.14 The **Wiltshire Core Strategy Development Plan Document** was formally adopted by Wiltshire Council on 20 January 2015. The Core Strategy contains a series of area strategies for each of the community areas of Wiltshire. In relation to the historic environment, Core Policy 58 states that:

“Development should protect, conserve and where possible enhance the historic environment.

Designated heritage assets and their settings will be conserved, and where appropriate enhanced in a manner appropriate to their significance, including:

- i. nationally significant archaeological remains*
- ii. World Heritage Sites within and adjacent to Wiltshire*
- iii. buildings and structures of special architectural or historic interest*
- iv. the special character or appearance of conservation areas*
- v. historic parks and gardens*
- vi. important landscapes, including registered battlefields and townscapes.*

Distinctive elements of Wiltshire’s historic environment, including non-designated heritage assets, which contribute to a sense of local character and identity will be conserved, and where possible enhanced. The potential contribution of these heritage assets towards wider social, cultural, economic and environmental benefits will also be utilised where this can be delivered in a sensitive and appropriate manner in accordance with Core Policy 57 (Ensuring High Quality Design and Place Shaping).”

6. Key Heritage Considerations

- 6.1 We would recommend the following key heritage considerations and design advice in developing emerging proposals for the Appraisal Site. It has been informed by the ZTV (**Appendix 2**) which assumes a ‘worst case scenario’ with maximum building heights, maximum developable areas and no proposed planting or mitigation (such as the proposed woodland).

Chiverlins Farmhouse

- 6.2 As set out within this report, initial research indicates that parts of the Appraisal Site have been in agricultural use since at least mid-18th century, linked to the grade II listed Chiverlins Farmhouse. A visual, functional and historic connection remains between parts of the site and the listed building. Based on the red line boundary, a large area of open space is to be retained to the south of the listed building which will assist in maintaining those elements of setting which contribute towards its significance. This open space would allow for a sense of openness, the agricultural character and the functional relationship between the farmhouse and the land to remain legible. It would also allow for the key views from the south to remain.
- 6.3 The redevelopment of the Appraisal Site will undoubtedly change the wider agricultural and rural character of the setting of the listed building and has the potential to reduce the ability to experience the former functional and historic relationship of the buildings with the surrounding agricultural land. The development of the Appraisal Site therefore has the potential to cause a level of harm to the significance and special interest of the listed building. Any harm is likely to be ‘less than substantial’ and would need to be weighed against the public benefits of any future scheme, bearing in mind the considerable importance and weight to be applied to the statutory duty of the 1990 Act.
- 6.4 As advocated by Historic England²⁰, this harm could be mitigated through good site design such as new tree planting to the boundaries of the Appraisal Site to filter and screen views towards new development. This could also include strengthening existing areas of planting. Any redevelopment should consider the use of bunding if it responds to the existing topography and doesn’t appear overly engineered and ‘man made’. The extent of developable area around the listed building could be explored further through the preparation of sections and wireframes to enable clearer understanding of the visual impact of the scheme from key views in the surrounding area.
- 6.5 Where less than substantial harm is identified, Paragraph 196 of the NPPF requires that this should be weighed against the public benefits of the proposal. PPG confirms that public benefits may follow from many developments and could be anything that delivers economic, social or environmental progress as described in the NPPF. Public benefits should flow from the proposals. They should be of a nature or scale to be of benefit to the public at large and should not just be a private benefit. Benefits do not

²⁰ Historic England (2015) Good Practice Advice Note 3: The Setting of Heritage Assets

always have to be visible or accessible to the public in order to be genuine public benefits and may include heritage benefits.

Corsham Court Registered Park and Garden

- 6.6 As described at Section 4, the north eastern corner of the Corsham Court Registered Park and Garden is of lesser interest when compared to the other aspects of the park (pleasure grounds, lake, tree avenues etc.) and has been subject to alteration. The ZTV indicates that built form may be visible from limited areas to the north eastern corner of the park. This has the potential to urbanise, to a minor degree, this part of the wider setting of the registered park and garden.
- 6.7 The introduction of planting and an appropriate landscape buffer to the southern boundaries of the Appraisal Site would screen any views of emerging proposals. The development of the site has the ability to sustain the significance of the Corsham Court Registered Park and Garden.

Medieval Settlement of Sheldon Scheduled Monument

- 6.8 The Medieval Settlement of Shelton Scheduled Monument is located to the north west of the Appraisal Site and its setting is largely characterised by tree plantations, open agricultural fields and the collection of buildings around Sheldon Manor. These all contribute to the significance of the scheduled monument. The ZTV indicates that built form may be visible in a number of views from the south of the scheduled monument due to the open nature of the site and the topography of the land. The development has the potential to urbanise, to a minor degree, the wider setting of the scheduled monument.
- 6.9 The introduction of planting and an appropriate landscape buffer to the north western boundaries of the Appraisal Site (such as the proposed woodland planting) could screen views of emerging proposals. The development therefore has the ability to sustain the significance of the Medieval Settlement of Shelton Scheduled Monument.

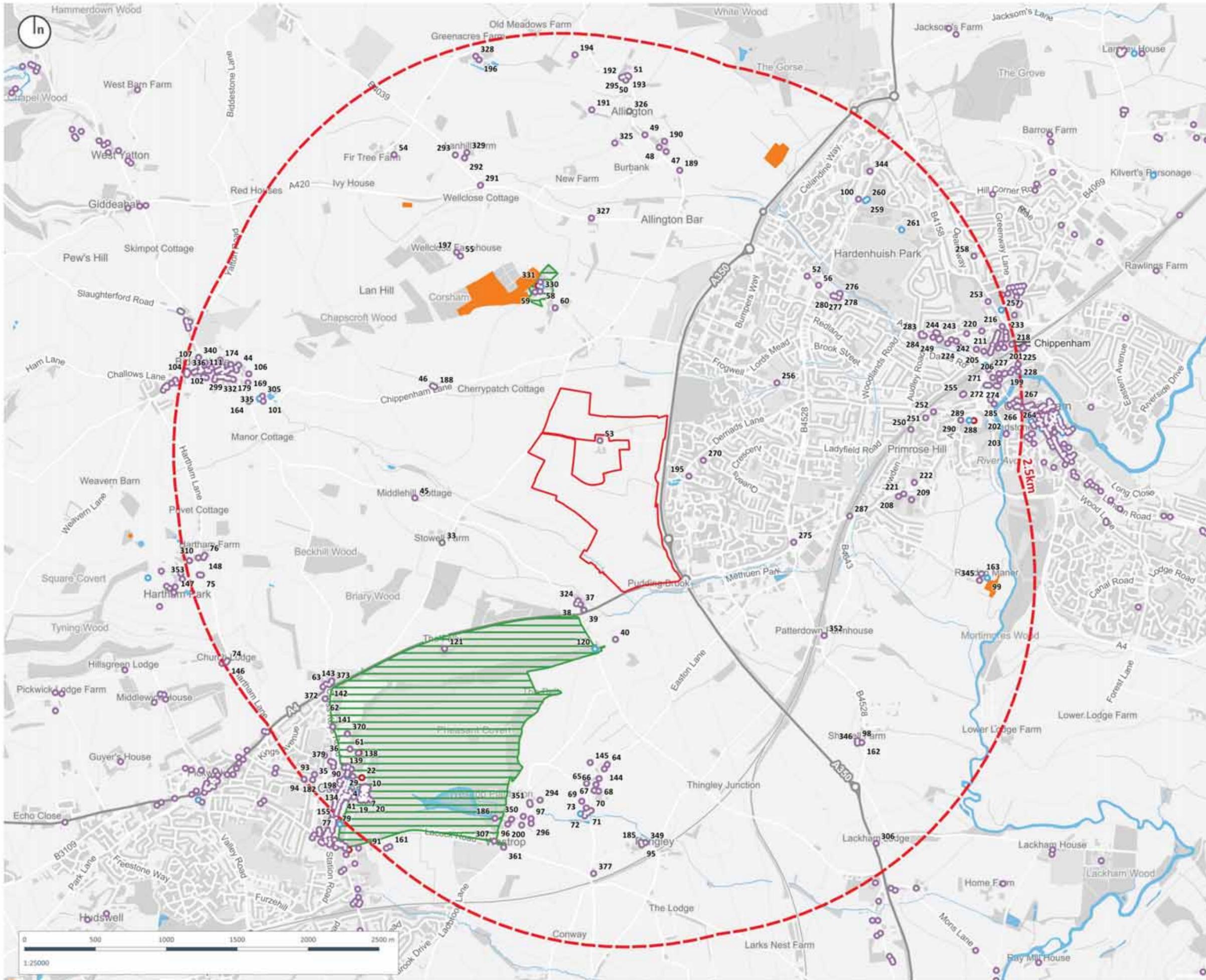
Other Listed Buildings

- 6.10 As set out earlier, the Appraisal Site forms part of the wider agricultural setting of numerous listed farmhouses in the surrounding area. Research has not identified any known historic or functional connections between these listed buildings and the Appraisal Site. From reviewing the ZTV (**Appendix 2**), it is anticipated that the redevelopment of the Appraisal Site has the potential to be visible and could urbanise, to a minor degree, the wider setting of these heritage assets. This will be in views from the listed buildings or views alongside them. In some cases, this could result in a minor harmful effect upon their significance.
- 6.11 Any potential harmful effect could be mitigated/avoided through planting and an appropriate landscape buffer to the relevant boundaries of the Appraisal Site. The extent of proposed planting and appropriate landscape buffers to the boundaries of the Appraisal Site could be explored further through the preparation of sections and wireframes to enable a clearer understanding of the visual impact of the scheme from key views in the surrounding area and appropriate mitigation approaches.

Summary

- 6.12 In summary, the redevelopment of the Appraisal Site has the potential to sustain the significance and setting of the majority of designated heritage assets within the surrounding area, subject to suitable mitigation measures such as planting and height of built form.
- 6.13 The proposals are likely to result in a degree of harm to the significance and setting of Chiverlins Farmhouse (Grade II listed) but this can be reduced through planting and an appropriate landscape buffer. Whilst this can be minimised, it is likely that any residual harm would be 'less than substantial' and would need to be considered and weighed in the wider planning balance.

Appendix 1: Heritage Asset Plan



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- Application Site
- 2.5 km Study Area
- Scheduled Monument
- Registered parks and gardens

- Listed Buildings**
- I
 - II*
 - II

CLIENT:
 Bloor Homes South West

PROJECT:
 Chippenham, Chiverlins Farm

DRAWING:
 Heritage Asset Plan

PROJECT NUMBER:
 BLDA3036

DRAWING NUMBER: GIS_101
CHECKED BY: JH

REVISION: 0
STATUS: Draft

DATE: February 2021
SCALE: 1:25000 @ A3

| Ref | Name | Grade |
|-----|---|-------|
| 1 | Unidentified Monument In Churchyard, About 2 Metres North Of West End Of North Aisle Of Church Of St Bartholomew | II |
| 2 | Howse Monument In Churchyard About 2 Metres North Of North Aisle First Buttress Of Church Of St Bartholomew | II |
| 3 | Unidentified Monument In Churchyard About 18 Metres North Of North Aisle Door Of Church Of St Bartholomew | II |
| 4 | Unidentified Monument In Churchyard About 19 Metres North Of North Aisle Door Of Church Of St Bartholomew | II |
| 5 | S. Guy Monument In Churchyard About 25 Metres North Of North Aisle Door Of Church Of St Bartholomew | II |
| 6 | Pocock Monument In Churchyard About 1 Metre East Of S. Guy Monument, North Of North Aisle Door Of Church Of St Bartholomew | II |
| 7 | M. Chanter Monument In Churchyard, About 2 Metres South Of Broome Monument, North East Of North Aisle Of Church Of St Bartholomew | II |
| 8 | Aust Monument In Churchyard About 6 Metres North North West Of Goddard Monument, North Of Transept Of Church Of St Bartholomew | II |
| 9 | Unidentified Monument In Churchyard About 5 Metres North North East Of Goddard Monument North Of North Transept Of Church Of St Bartholomew | II |
| 10 | Batchelor Monument In Churchyard About 5 Metres North East Of Newman Monument, North Of Chancel Of Church Of St Bartholomew | II |
| 11 | Isaac Monument About 4 Metres South Of North Boundary Wall, In North East Angle Of Churchyard Of Church Of St Bartholomew | II |
| 12 | Melrose Monument About 6 Metres East South East Of Isaac Monument At North East Angle Of Churchyard Of Church Of St Bartholomew | II |
| 13 | Townsend Monument In Churchyard About 9 Metres South Of South Porch Of Church Of St Bartholomew | II |
| 14 | Unidentified Monument In Churchyard About 9 Metres South Of Townsend Monument South Of Porch Of Church Of St Bartholomew | II |
| 15 | Hulbert Monument In Churchyard About 4 Metres South Of South Door Of Tower Of Church Of St Bartholomew | II |
| 16 | Morgan Monument In Churchyard About 7 Metres South Of South East Angle Of Church Of St Bartholomew | II |
| 17 | Brewer Monument In Churchyard About 1 Metre East Of Morgan Monument South Of South East Angle Of Church Of St Bartholomew | II |
| 18 | Ford Monument In Churchyard About 2 Metres South East Of South East Buttress Of South Aisle Of Church Of St Bartholomew | II |
| 19 | Unidentified Monument In Churchyard About 4 Metres South Of M. Hulbert Monument South East Of Church Of St Bartholomew | II |
| 20 | Brakspear Monument In Churchyard About 4 Metres From East Boundary Wall East Of South Aisle Of Church Of St Bartholomew | II |
| 21 | 3, Church Street | II |
| 22 | Corsham Court | I |
| 23 | The Coach House | II |
| 24 | The Bradford Porch In Garden To Rear Of Bath House | II |
| 25 | Barn In Estate Yard | II |
| 26 | Unidentified Monument In Churchyard About 1 Metre North East Of J. Chanter Monument North East Of North Aisle Of Church Of St Bartholomew | II |
| 27 | Cole Monument In Churchyard About 7 Metres North Of Reynolds Monument, By West Boundary Wall, North Of Church Of St Bartholomew | II |

| Ref | Name | Grade |
|-----|---|-------|
| 28 | Unidentified Monument In Churchyard About 1 Metre North Of G. Neale Monument North Of North West End Of Church Of St Bartholomew | II |
| 29 | Unidentified Monument In Churchyard About 4 Metres East Of S. Neale Monument, North Of North Aisle Of Church Of St Bartholomew | II |
| 30 | Sweatman Monument In Churchyard About 3 Metres South Of Churchyard North Wall, North Of North Transept Of Church Of St Bartholomew | II |
| 31 | Unidentified Monument In Churchyard About 7 Metres North Of Westfield Monument, North Of North Transept Of Church Of St Bartholomew | II |
| 32 | Unidentified Monument In Churchyard About 9 Metres North Of Westfield Monument, North Of North Transept Of Church Of St Bartholomew | II |
| 33 | Stowells Farmhouse | II |
| 34 | Priory Cottage | II |
| 35 | 6, Bences Lane | II |
| 36 | 10, Bences Lane | II |
| 37 | Mynte Farmhouse | II |
| 38 | Cartshed And Loft At Mynte Farm | II |
| 39 | Chequers Farmhouse | II |
| 40 | Old Road Cottage | II |
| 41 | Gatepiers At East End Of Church Street | II |
| 42 | Church Of St Bartholomew | I |
| 43 | The Coach House | II |
| 44 | Barn About 20 Metres To North Of Home Farmhouse | II |
| 45 | Middlehill Farmhouse | II |
| 46 | Barn Range At Starveall Farm | II |
| 47 | Allington Manor Farmhouse | II |
| 48 | Barn To North West Of Allington Manor Farmhouse | II |
| 49 | Ivy Cottage | II |
| 50 | Gate Lodges, Piers, Gatey And Wall To North Of East Lodge At Bolehyde Manor | II |
| 51 | Pair Of Summerhouses To East Of Bolehyde Manor | II |
| 52 | Milestone About 100 Metres North West Of Junction With Old Hardenhuish Lane | II |
| 53 | Chiverlins Farmhouse | II |
| 54 | Sparrow Farmhouse And Dovecote Cottage Attached | II |
| 55 | Cart Shed To South Of Wellclose Farmhouse | II |
| 56 | Turnpike Cottage | II |
| 57 | Sheldon Manor | I |
| 58 | Chapel To The South-east Of Sheldon Manor | II* |
| 59 | Converted Barn Range To West Of Sheldon Manor | II |
| 60 | Sheldon Farmhouse | II |
| 61 | Walls To Walled Garden And Gardener's House Attached | II |
| 62 | 2-4 | II |
| 63 | 11 | II |
| 64 | Barn To East Of Easton Farmhouse | II |
| 65 | Sparrows Barton | II |
| 66 | Easton Court Farmhouse | II |
| 67 | Barn To South Of Easton Court Farmhouse | II |
| 68 | Barn To South West Of Easton Court Farmhouse | II |
| 69 | Number 9, Easton | II |
| 70 | Number 15, Easton | II |
| 71 | Easton House | II* |
| 72 | Coach House At Easton House | II |
| 73 | Dovecote 30m West Of Easton House | II* |
| 74 | Gates, Piers And Railings Adjoining Church Lodge | II |
| 75 | Gates, Piers And Railings To Hartham House | II |
| 76 | Barn At Hartham Farm | II |
| 77 | Nos 42 And 42a And Cottage To Rear Of No 42 | II |
| 78 | 44, High Street | II |
| 79 | Rowan House | II |
| 80 | 54, High Street | II |
| 81 | Cheviot House | II |
| 82 | 78 And 78a, High Street | II |
| 83 | 92, 92a And 90a, High Street | II* |
| 84 | 110 And 112, High Street | II* |
| 85 | 35 And 37, High Street | II |
| 86 | 59, High Street | II |
| 87 | The Packhorse Inn | II |
| 88 | 69, High Street | II |

| Ref | Name | Grade |
|-----|---|-------|
| 89 | 75, High Street | II |
| 90 | 79, High Street | II* |
| 91 | South Bank Farmhouse | II |
| 92 | Ivy House | II* |
| 93 | Spring Gardens And Barn Attached | II |
| 94 | Corsham Baptist Church | II |
| 95 | Thingley Court Farmhouse | II |
| 96 | Park Farmhouse | II |
| 97 | Summerhouse In Walled Garden Of Old House | II |
| 98 | Showell Farmhouse | II |
| 99 | Rowden Farmhouse With Barn, Outbuildings And Gatepiers Attached | II* |
| 100 | The Old Rectory | II |
| 101 | Dovecote And Stable To South East Of Manor House | II |
| 102 | Wellhead | II |
| 103 | The Croft | II |
| 104 | Young Tomb In The Churchyard About 18 Metres South Of West End Of Church Of St Nicholas | II |
| 105 | Edwards Tomb In The Churchyard, About 14 Metres South Of Navis South East Angle Of Church Of St Nicholas | II |
| 106 | Outbuildings To North Of Manor Farmhouse | II |
| 107 | Outhouse 25 Metres To North Of The Little House | II |
| 108 | Gatepiers To Elm House Farmhouse | II |
| 109 | The Close | II |
| 110 | The Cottage | II |
| 111 | The Old Wool House | II |
| 112 | Lane House | II |
| 113 | Willow House With Gate Piers And Walls | II |
| 114 | Pool Farmhouse And Attached Outbuildings | II |
| 115 | The Green | II |
| 116 | Wickham Cottage | II |
| 117 | Gable Cottage | II |
| 118 | School Cottage | II |
| 119 | 3, Harts Lane | II |
| 120 | Gatepiers At North East Entrance To Corsham Park | II* |
| 121 | The Folly Farmhouse, Barn And Stable | II |
| 122 | Manley Monument In Churchyard About 4 Metres East Of Pocock Monument, About 19 Metres North Of North Transept Of Church Of St Bartholomew | II |
| 123 | Broome Monument In Churchyard About 1 Metre East Of Hayward Monument, North Of North East Angle Of North Aisle Of Church Of St Bartholomew | II |
| 124 | J. Chanter Monument In Churchyard About 1 Metre East Of M. Chanter Monument North East Of North Aisle Of Church Of St Bartholomew | II |
| 125 | Armstrong And Dickinson Monuments In Churchyard About 5 Metres North East Of Todd Monument, North Of North Aisle Of Church Of St Bartholomew | II |
| 126 | Unidentified Monument In Churchyard About 12 Metres South Of Sweatman Monument North Of North Transept Of Church Of St Bartholomew | II |
| 127 | Bayly Monument In Churchyard About 8 Metres North Of Westfield Monument, North Of North Transept Of Church Of St Bartholomew | II |
| 128 | Goddard Monument In Churchyard About 30 Metres North Of North East Angle Of North Transept Of Church Of St Bartholomew | II |
| 129 | Unidentified Monument In Churchyard About 7 Metres North North West Of Goddard Monument, North Of Transept Of Church Of St Bartholomew | II |
| 130 | Milcom Monument At North East Corner Of Churchyard Of Church Of St Bartholomew | II |
| 131 | Unidentified Monument In Churchyard About 22 Metres South Of South Aisle Of Church Of St Bartholomew | II |
| 132 | M. Hulbert Monument In Churchyard About 4 Metres South East Of East Hulbert Monument, South East Of South East Angle Of South Aisle Of Church Of St Bartholomew | II |
| 133 | Hulbert Monument In Churchyard By North Churchyard Wall About 26 Metres East Of South Aisle Of Church Of St Bartholomew | II |
| 134 | 2, Church Street | II |

| Ref | Name | Grade |
|-----|--|-------|
| 135 | 4 And 5, Church Street | II |
| 136 | 7-10, Church Street | II |
| 137 | Stables, Riding School And Entrance Archway To Corsham Court | II* |
| 138 | The Bath House | I |
| 139 | Timber Store On West Side Of Estate Yard | II |
| 140 | Rear Gatepiers And Wall Extending South East To No 112 High Street And North West To End Wall Of Timber Store In Estate Yard | II |
| 141 | Cheiltenham Cottage | II |
| 142 | The Cross Keys Inn | II |
| 143 | 14 And 15 | II |
| 144 | Easton Farmhouse | II |
| 145 | Smithfield Cottages | II |
| 146 | Church Lodge | II |
| 147 | The Gate Lodge | II |
| 148 | Cartshed With Loft At Hartham Farm | II |
| 149 | 80 And 82, High Street | II |
| 150 | Johnson's Bakery | II* |
| 151 | 84-100, High Street | II* |
| 152 | 106 And 108, High Street | II* |
| 153 | Porch House | II |
| 154 | K6 Telephone Kiosk | II |
| 155 | 45-9, High Street | II |
| 156 | 57, High Street (see Details For Further Address information) | II |
| 157 | 69a, High Street | II |
| 158 | 71 And 73, High Street | II |
| 159 | 77, High Street | II |
| 160 | 81, High Street | II |
| 161 | Barn Range To East Of South Bank Farmhouse | II |
| 162 | Barn To South East Of Showell Farmhouse | II |
| 163 | Stable At Rowden Farm | II |
| 164 | Gazebo And Garden Wall To West Of Manor House | II |
| 165 | The Old Bakehouse | II |
| 166 | Church Of St Nicholas | I |
| 167 | Alborn Tomb In The Churchyard, About 15 Metres South Of West End Of Church Of St Nicholas | II |
| 168 | Alborn Tomb In The Churchyard, About 19 Metres South Of West End Of Church Of St Nicholas | II |
| 169 | Manor Farmhouse | II |
| 170 | The Corner House | II |
| 171 | Barn To North Of Elm House Farmhouse | II |
| 172 | Garden Building To South Of The Close | II |
| 173 | Stonehaven | II |
| 174 | Field Farmhouse | II |
| 175 | The Old Fire Station | II |
| 176 | Willow Cottage | II |
| 177 | The Malthouse | II |
| 178 | The Old Forge | II |
| 179 | Twitten Bend | II |
| 180 | Quoin Cottage | II |
| 181 | 4 And 5, Harts Lane | II |
| 182 | The Duke Of Cumberland | II |
| 183 | Stable About 6 Metres To North Of Home Farmhouse | II |
| 184 | Bolehyde Manor | II* |
| 185 | Barn To Rear Of Thingley Court Farmhouse | II |
| 186 | Lake Cottage | II |
| 187 | Barn At Park Farm | II |
| 188 | Starveall Farmhouse | II |
| 189 | The Cottage | II |
| 190 | Barn To North Of Allington Manor Farmhouse | II |
| 191 | The Pitts | II |
| 192 | Dovecote To South West Of Bolehyde Manor | II |
| 193 | Converted Coach House To East Of Bolehyde Manor And Gatepiers To West | II |
| 194 | The Grange | II |
| 195 | Derlads Farmhouse | II |
| 196 | Fowlswick Farmhouse | II |
| 197 | Wellclose Farmhouse | II |
| 198 | K6 Telephone Kiosk Immediately East Of Town Hall | II |
| 199 | Ruskin Cottage | II |

ORIENT

Blair Homes South West

PROJECT

Chipperton, Chiverlins Farm

DRAWING

Heritage Assets Schedule

PROJECT NUMBER

BLOA3036

DRAWING NUMBER

G15_102

CHECKED BY

JH

REVISION

0

STATUS

Draft

DATE

February 2021

SCALE

1:25000 @ A3

| Ref | Name | Grade |
|-----|--|-------|
| 200 | 3 | II |
| 201 | 2 And 3, Union Road | II |
| 202 | 26, Westmead Lane | II |
| 203 | Westmead House And Attached Wall | II |
| 204 | Numbers 1-7 (consecutive) And Ruskin Cottage | II |
| 205 | 1 And 2, St Paul Street | II |
| 206 | Baptist Church And Attached Walls And Piers | II |
| 207 | 19, The Bridge (see Details For Further Address Information) | II |
| 208 | Wiltshire Area Health Authority Headquarters | II |
| 209 | Front And Main Rear Range Of St Andrews Hospital And Attached Walls | II |
| 210 | Number 38, 39 And 40 And Attached Walls And Gate Piers | II |
| 211 | Number 41, 42, And 43 And Attached Walls And Gate Piers | II |
| 212 | 44 And 45, New Road | II |
| 213 | 46 And 47, New Road | II |
| 214 | The Black Horse Public House | II |
| 215 | Railway Viaduct | II* |
| 216 | The Little George Hotel | II |
| 217 | Old Road Tavern | II |
| 218 | Mortimers Weighbridge Office, Chippenham Station Yard | II |
| 219 | 11-14, Park Lane | II |
| 220 | 26a, Park Lane | II |
| 221 | Number 31 And Attached Walls And Gate Piers | II |
| 222 | St Margarets Convent And Attached Walls | II |
| 223 | 73 And 74, Marshfield Road | II |
| 224 | 81 And 82, Marshfield Road | II |
| 225 | 6 And 7, Monkton Hill | II |
| 226 | Methodist Church And Attached Walls And Piers | II |
| 227 | Monkton Cottage | II |
| 228 | Three Gate Piers At Entrance Monkton House | II |
| 229 | 1 And 2, New Road | II |
| 230 | The Squire Restaurant | II |
| 231 | 19 And 20, New Road | II |
| 232 | 22 And 23, New Road | II |
| 233 | The New Inn | II |
| 234 | Number 30 And Attached Walls And Gate Piers | II |
| 235 | 31, New Road | II |
| 236 | Number 32 And Attached Walls And Gate Piers | II |
| 237 | Numbers 33 And 34 And Attached Walls And Gate Piers | II |
| 238 | Numbers 35 And 36 And Attached Walls And Gate Piers | II |
| 239 | Number 37 And Attached Walls And Gate Piers | II |
| 240 | Vine Cottage | II |
| 241 | Numbers 28 And 29 And Attached Wall And Gate Piers | II |
| 242 | Number 30 And Attached Walls And Piers | II |
| 243 | Verona Villas And Attached Front Walls And Gate Piers | II |
| 244 | Falstaff Villas And Attached Front Walls And Gate Piers | II |
| 245 | 52, 67, Marshfield Road | II |
| 246 | 68, Marshfield Road | II |
| 247 | 69, Marshfield Road | II |
| 248 | K6 Telephone Kiosk Adjacent To Number 69 | II |
| 249 | The Cottage | II |
| 250 | 81, 82 And 83, Lowden | II |
| 251 | Lowden Manor | II |
| 252 | Gate Piers And Walls To Lowden Manor | II |
| 253 | Parklands | II |
| 254 | 5 And 6, Ivy Lane | II |
| 255 | Ivy Cottages | II |
| 256 | Numbers 30 And 32 And Attached Garden Wall Church Of St Paul And Attached Walls, Gates And Piers | II* |
| 258 | Greystones | II |
| 259 | Church Of St Nicholas | II* |
| 260 | David Ricardo Monument In Churchyard Of Church Of St Nicholas | II* |
| 261 | Hardenhuish House (Chippenham Grammar School) | II* |
| 262 | 2 And 3, High Street | II |
| 263 | 4 And 5, High Street | II |
| 264 | 6, High Street | II |
| 265 | 7, High Street | II |

| Ref | Name | Grade |
|-----|---|-------|
| 266 | 10 And 11, High Street | II |
| 267 | Lloyds Bank | II |
| 268 | National Westminster Bank And Attached Walls | II |
| 269 | New Town Hall And Need Hall | II |
| 270 | Derriads And Wall Attached To Rear | II |
| 271 | 28-30, Foghamshire | II |
| 272 | 31 And 32, Foghamshire | II |
| 273 | 33, Foghamshire | II |
| 274 | Constitutional Club | II |
| 275 | The Pheasant Public House | II |
| 276 | The Folly | II |
| 277 | 25, 27 And 29, Bristol Road | II |
| 278 | 31, Bristol Road | II |
| 279 | 35, Bristol Road | II |
| 280 | 39, Bristol Road | II |
| 281 | 41, Bristol Road | II |
| 282 | Oak Cottage And Little Oak | II |
| 283 | Oak Lodge And Attached Yard Walls | II |
| 284 | Stable, Outbuildings And Attached Wall To The Rear (east) Of Oak Lodge | II |
| 285 | Avon Bridge House | II |
| 286 | Bank House | II |
| 287 | Railway Bridge Over Bath Road | II |
| 288 | The Ivy And The Ivy West Wing | I |
| 289 | The Ivy Longhouse And The Ivy Stables | II* |
| 290 | Garden Wall Attached To The West Of Ivy Stables And Extending To South | II |
| 291 | Direction Stone At Junction Of A420 And B4039 | II |
| 292 | Lanhill Farmhouse And Stables Attached | II |
| 293 | Lanhill Cottages | II |
| 294 | Rose And Unicorn House | II |
| 295 | Bolehyde Manor | II* |
| 296 | The Old House | II |
| 297 | 6 | II |
| 298 | The White Horse Inn | II |
| 299 | Hawthorne Cottage And Outbuildings | II |
| 300 | Elm Cottage | II |
| 301 | Shepherds Cottage | II |
| 302 | Unidentified Tomb In The Churchyard 3 Metres East Of South Porch Of Church Of St Nicholas | II |
| 303 | 7, The Green | II |
| 304 | Summerhouse And Garden Walls To Garden East Of Ivy House | II |
| 305 | Priest's House To East Of Manor House | II |
| 306 | Front Lodge, Lackham College | II |
| 307 | Westrop Lodge | II |
| 308 | The Old Bank House | II |
| 309 | Town Hall | II |
| 310 | Hartham Farmhouse | II |
| 311 | Number 6, Easton | II |
| 312 | The Old Laundry Cottage And Attached Range | II |
| 313 | Granary 77m Nw Of Corsham Court | II |
| 314 | The Sham Ruin | II* |
| 315 | Unidentified Monument In Churchyard About 13 Metres North Of Goddard Monument, North Of North Transept Of Church Of St Bartholomew | II |
| 316 | Newman Monument In Churchyard About 4 Metres North East Of Goddard Monument, North Of North East Chapel Of Church Of St Bartholomew | II |
| 317 | Unidentified Monument In Churchyard About 3 Metres North East Of S. Neale Monument, North Of North Aisle Of Church Of St Bartholomew | II |
| 318 | Arnold Monument In Churchyard About 1 Metre East Of Reynolds Monument, North Of North West End Of Church Of St Bartholomew | II |
| 319 | G. Neale Monument In Churchyard About 1 Metre North Of S. Neale Monument, North Of North West End Of Church Of St Bartholomew | II |
| 320 | West Monument In Churchyard About 5 Metres South East Of S. Neale Monument, North Of North Aisle Of Church Of St Bartholomew | II |
| 321 | Unidentified Monument In Churchyard About 2 Metres South East Of J. Chanter Monument, North East Of North East Angle Of North Aisle Of Church Of St Bartholomew | II |
| 322 | Lyne Monument In Churchyard About 2 Metres North West Of Mary Guy Monument, North Of North Aisle Of Church Of St Bartholomew | II |

| Ref | Name | Grade |
|-----|--|-------|
| 323 | Guy Monument In Churchyard About 3 Metres North Of S. Guy Monument, North Of North Aisle Of Church Of St Bartholomew | II |
| 324 | Barn At Mynte Farmhouse And Attached Stairs | II |
| 325 | Foxhill House | II |
| 326 | Ailington House | II |
| 327 | Milestone About 20 Metres South West Of Springfields | II |
| 328 | Barn To North West Of Fowiswick Farmhouse | II |
| 329 | Farmyard Buildings At Lanhill Farm | II |
| 330 | Gatepiers, Gate And Wall To Front Garden Of Sheldon Manor | II |
| 331 | Granary To North East Of Sheldon Manor | II |
| 332 | White Hart Cottage | II |
| 333 | 2, Haris Lane | II |
| 334 | Home Farmhouse And Attached Mathouse And Barn | II |
| 335 | The Manor House And Barn | II* |
| 336 | Turnpike Cottage | II |
| 337 | Unidentified Tomb In The Churchyard About 5 Metres South Of South Porch Of Church Of St Nicholas | II |
| 338 | Unidentified Tomb In The Churchyard, At South West Angle Of Churchyard Of St Nicholas | II |
| 339 | The Little House And Outbuildings | II |
| 340 | Biddestone Baptist Chapel | II |
| 341 | Elm House Farmhouse Home Place | II |
| 342 | Gazebo At Pool Farmhouse | II |
| 343 | Saw Mill Cottage | II |
| 344 | Lipper Farmhouse | II |
| 345 | Barn At Rowden Farm | II |
| 346 | Granary To South Of Showell Farmhouse | II |
| 347 | Ivy House Stables | II |
| 348 | Heywood House Preparatory School The Priory | II |
| 349 | Coach House At Thingley Court Farm | II |
| 350 | Westrop House | II |
| 351 | 8 And 9 | II |
| 352 | Patterdown Farmhouse | II |
| 353 | Home Farmhouse | II |
| 354 | 52, High Street | II |
| 355 | The Royal Oak Inn | II |
| 356 | Corsham Post Office | II |
| 357 | 102 And 104, High Street | II* |
| 358 | 51 And 53, High Street | II |
| 359 | 67, High Street | II |
| 360 | Mayo Fountain | II |
| 361 | Milestone To West Of Ladbroke Lane Junction | II |
| 362 | Westfield Monument In Churchyard About 13 Metres South South East Of Sweatman Monument North Of North Transept Of Church Of St Bartholomew | II |
| 363 | Taylor Monument In Churchyard About 3 Metres East Of Townsend Monument, South Of Porch Of Church Of St Bartholomew | II |
| 364 | Hawkins Monument In Churchyard About 12 Metres South Of Chancel Of Church Of St Bartholomew | II |
| 365 | Unidentified Monument In Churchyard About 1 Metre East Of South Aisle Of Church Of St Bartholomew | II |
| 366 | Dumison And Hulbert Monuments In Churchyard About 1.5 Metres North East Of Brewer Monument, South Of South East Angle Of South Aisle Of Church Of St Bartholomew | II |
| 367 | 1, Church Street | II |
| 368 | Ethelred House | II |
| 369 | Walls And Gates To Each Side Of South Garden At Corsham Court | II |
| 370 | Conduit House In Arboretum To North Of Kitchen Gardens | II |
| 371 | Workshop Range On South Side Of Estate Yard | II |
| 372 | The Lodge | II |
| 373 | 16 | II |
| 374 | Numbers 10-13, Easton | II |
| 375 | Porch To Easton House | II |
| 376 | Outbuilding To West Of Easton House | II |
| 377 | The Roebuck Inn | II |
| 378 | 2 And 3, Bence Lane | II |

| Ref | Name | Grade |
|-----|---|-------|
| 379 | 8 And 9, Bence Lane | II |
| 380 | Gatepiers To Churchyard Of Church Of St Bartholomew | II |
| 381 | Collett Monument In Churchyard About 1 Metre North Of North Aisle First Buttress Of Church Of St Bartholomew | II |
| 382 | Dancy Monument In Churchyard About 2 Metres North Of North Aisle First Window Of Church Of St Bartholomew | II |
| 383 | Unidentified Monument In Churchyard About 20 Metres North Of North Aisle Door Of Church Of St Bartholomew | II |
| 384 | M. Guy Monument In Churchyard About 4 Metres North Of S. Guy Monument, North Of North Aisle Door Of Church Of St Bartholomew | II |
| 385 | Hayward Monument In Churchyard About 10 Metres North Of North East Angle Of North Aisle Of Church Of St Bartholomew | II |
| 386 | Reynolds Monument In Churchyard By West Boundary Wall, About 41 Metres North Of North West End Of Church Of St Bartholomew | II |
| 387 | S. Neale Monument In Churchyard About 2 Metres North East Of Reynolds Monument, North Of North West End Of Church Of St Bartholomew | II |
| 388 | Todd Monument In Churchyard About 5 Metres East North East Of Cole Monument, North Of North Aisle Of Church Of St Bartholomew | II |
| 389 | War Memorial | II |
| 390 | Dovecote 75m North-west Of Corsham Court | II |
| 391 | Orwell House | II |

CLIENT
Bloom Homes South West

PROJECT
Chippenham, Chiverins Farm

DRAWING
Heritage Assets Schedule

PROJECT NUMBER
BLDA3036

DRAWING NUMBER
GIS_103

CHECKED BY
JH

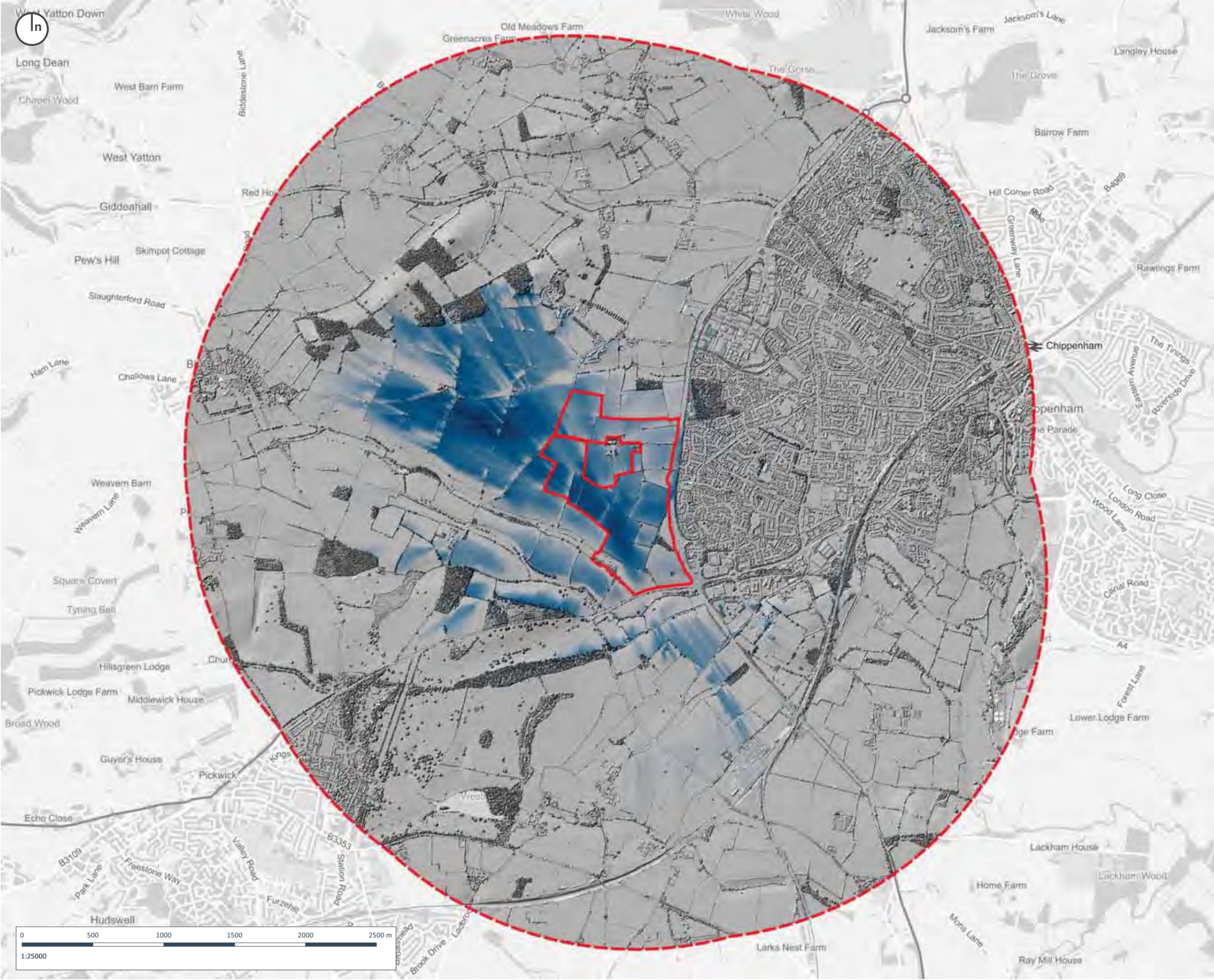
REVISION
0

STATUS
Draft

DATE
February 2021

SCALE
1:25000 @ A3

Appendix 2: Zone of Theoretical Visibility



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- Site Boundary
- 2.5 km Study Area

**LIDAR DSM 2019 1M
 Zone of Theoretical Visibility (ZTV)**

- Low potential visibility
- High potential visibility



CLIENT:
 Bloor Homes South West

PROJECT:
 Chippenham, Chiverlins Farm

DRAWING:
 Zone of Theoretical Visibility (ZTV)

PROJECT NUMBER:
 BLOA3036

DRAWING NUMBER: GIS_100 **CHECKED BY:** JH

REVISION: 0 **STATUS:** Draft

DATE: February 2021 **SCALE:** 1:25000 @ A3



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Spatial Planning
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By Email: spatialplanningpolicy@wiltshire.gov.uk

08 March 2021

Dear Sir/Madam

REPRESENTATIONS TO THE WILTSHIRE LOCAL PLAN REVIEW CONSULTATION MARCH 2021

On behalf of our client Langley Properties Limited (LPL), we write to submit representations to the Wiltshire Local Plan Review (the WLPR) which comprises the 'Emerging Spatial Strategy' consultation document (ESS) and the Planning for Chippenham (PFC) consultation document.

We set out below the background and context to this submission, before setting out our client's response to specific elements of the WLPR.

Background and context

LPL are the owners of the southern part of the Langley Park site (the Site), which is the land for the residential phase of the wider Langley Park development site in Chippenham. (see site location plan at Appendix A).

The Site lies within the urban area of Chippenham, approximately 0.5km north west of the town centre and is bordered by houses on its western and northern boundaries, the Siemens complex of buildings and car parks to the east, and to the south by an Aldi store, Travelodge Hotel, 22 residential units under construction, beyond which is the railway line. Chippenham Railway Station and station car park.

The Site comprises previously developed land made up of offices, industrial buildings and areas used for car parking and hardstanding. On the western boundary of this part of the Site are homes on Hawthorn Road and Tugela Road which lie within the Chippenham Conservation Area, however none of the Site is within the Chippenham Conservation Area.

The main accesses to the Site are from Westinghouse Way in the north and Foundry Lane in the south and Langley Park Way provides a north to south route through the Site. The accesses from Hawthorn Road and Tugela Road are gated and fenced off.

The site is strategically located within 4 miles of Junction 17 of the M4 motorway. It has a direct connection onto the A420 Bristol Road (main route into Bristol from Chippenham) and to the west to the A4 linking Chippenham to Bath. The Site is located next to Chippenham Railway Station and is on the main line providing services to London, Wales and the South West.

The Site is well served by buses with the nearest bus stop located on Langley Road, 100m from the entrance to Langley Park, which is the 44B Chippenham Town bus route. Several other bus stops are located within a short walk from the Site serving both local and town routes and more long-distance routes to centres such as Bath and Bristol, including the 35/35A, 91 and 635 services.

The wider Langley Park Site has a long and complex planning history; however, the following provides an overview of the recent history:

Outline planning permission (16/03515/OUT) was granted on 11 January 2017 for the following:

“Demolition of existing buildings and redevelopment to provide up to 400 units (C3); a 69 bed hotel (C1) with café (A3) up to 100 sqm; discount foodstore (A1) of up to 1,741 sqm; B1, B2 & B8 floorspace (up to 13,656 sqm) and highway improvements to the little George and the B4069/Pew Hill junctions with all matters (except access) reserved”.

An Aldi foodstore and a Travelodge Hotel were the subject of separate planning approvals (refs: 16/04269/FUL & 16/04272/FUL) and were completed in 2019. The Travelodge Hotel approval included the construction of 22 apartments, and these are currently under construction by Crest Nicholson.

In December 2019 a reserved matters application was submitted for the remaining residential development of the site pursuant to outline planning permission (16/03515/OUT). This reserved matters application (ref: 19/12100/REM) provides the details for 333 dwellings on the site and is currently under determination.

It is evident that the residential element of Langley Park is an important brownfield regeneration scheme in Chippenham town centre.

Emerging Spatial Strategy (ESS)

Chippenham is identified as a principal settlement along with Salisbury and Trowbridge within the draft ESS. Principal Settlements are the primary focus for development and will provide significant levels of jobs and homes.

Section 2 of the ESS deals with Growth and Climate Change and confirms that the aim is to focus growth on the main settlements and in particular the largest settlements, including Chippenham. Focusing new development within the County's main settlements reduces carbon in different ways, including:

- making best use of existing infrastructure;
- better supporting existing businesses;
- reducing the need to travel and supporting active means of travel (walking and cycling); and
- providing opportunities to design new neighbourhoods for renewable energy supply.

Paragraph 2.4 explains that maximising development that reuses previously developed land and limits the loss of countryside wherever possible remains a priority.

LPL strongly agree with the aim of focusing growth on the main settlements including Chippenham. The Site at Langley Park, Chippenham provides an excellent opportunity to help fulfil this aim. The Site is a previously developed site in a sustainable location close to Chippenham railway station and town centre. The Site benefits from outline planning permission for up to 400 new homes.

The aims and priorities detailed in Section 2 of the ESS are in line with the National Planning Policy Framework (NPPF). Paragraph 117 of the NPPF states that planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment. Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously developed or 'brownfield' land.

Paragraph 118 of the NPPF states that planning policies should give substantial weight to the value of using brownfield land within settlements for homes and other identified needs and should promote and support the development of under-utilised land and buildings.

The local housing need for the Wiltshire housing market areas is set out at paragraph 2.17 of the ESS and it is identified that the housing need for Chippenham is between 17,410 (Standard Method) and 20,400 (Local Housing Needs Assessment) additional dwellings over the period 2016-2036. At paragraph 2.24 it is confirmed that the interim sustainability appraisal concluded that there are no adverse effects of such significance that would prevent the higher housing need figure being progressed. It is also confirmed that the higher level would be more robust when planning for the longer term and does more to meet national and local needs for more homes. The higher level has been taken forward as the basis for developing the emerging spatial strategy. This approach is fully supported by LPL since it assists with the aim set out in the NPPF that plans should be prepared positively, in a way that is aspirational but deliverable (paragraph 16).

The three alternative development strategies for the Chippenham housing market area that were tested through the Sustainability Appraisal are set out on page 12 of the ESS. These are as follows:

- **Chippenham A (CH-A)** – Roll forward the core strategy pattern of distribution – 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;
- **Chippenham B (CH-B)** – Chippenham Expanded Community – More constrained settlements (Corsham, Clane, 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; and
- **Chippenham C (CH-C)** – Melksham Focus 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.

Whilst it is recognised that the emerging spatial strategy is not simply a choice of one of these alternatives, at paragraph 3.3 of the consultation document, it is concluded that of the alternatives, the Chippenham Expanded Community (Chippenham B) development strategy performed best in sustainability terms. The emerging strategy therefore has a strong focus on growth at Chippenham. This approach is fully supported by LPL.

The consultation document (paragraph 3.37) confirms that a focus on Chippenham provides opportunities on a scale to design new neighbourhoods which incorporate renewable energy, provide alternatives to the private car and make the best use of existing infrastructure. Employment evidence points to substantial interest and

good prospects for the town's economy to grow and growing local spending will help the town centre to serve its local community.

Whilst it is acknowledged that the scale of growth may need to be accommodated as a large urban extension, the Langley Park site, provides an excellent opportunity to help towards providing the housing growth identified for Chippenham. The Site is previously developed, benefits from outline planning permission and is in a sustainable location, close to the town centre and public transport links.

LPL strongly support the Chippenham B (CH-B) – Chippenham Expanded Community, spatial development strategy. Chippenham is best placed to accommodate the sustainable, growth required.

Planning for Chippenham (PFC)

The Planning for Chippenham (PFC) consultation document sets out some detail and asks some fundamental questions on how Chippenham could grow over the next 15 years.

Scale of growth

Paragraph 11 confirms that when the number of homes built and in the pipeline is deducted it leaves a further 5,100 homes to be accommodated up until 2036. Paragraph 13 states that the need for development land should be met as far as possible on brownfield sites in order to help minimise the loss of greenfield land. The Council suggests that a target of 240 homes could be built in Chippenham on brownfield sites over the next 10 years.

At paragraph 16 it is acknowledged that planning positively for brownfield sites, can work alongside allocations of greenfield land.

Consultation Question CP1 – What do you think to this scale of growth? Should there be a brownfield target? Should they be higher or lower?

LPL supports the scale of growth proposed and considers that in support of this, there should be a brownfield land target supported by sufficient brownfield land allocations for Chippenham. As acknowledged within the consultation document, positive planning for brownfield sites can work alongside the allocations of greenfield land that will be required to meet the identified growth strategy.

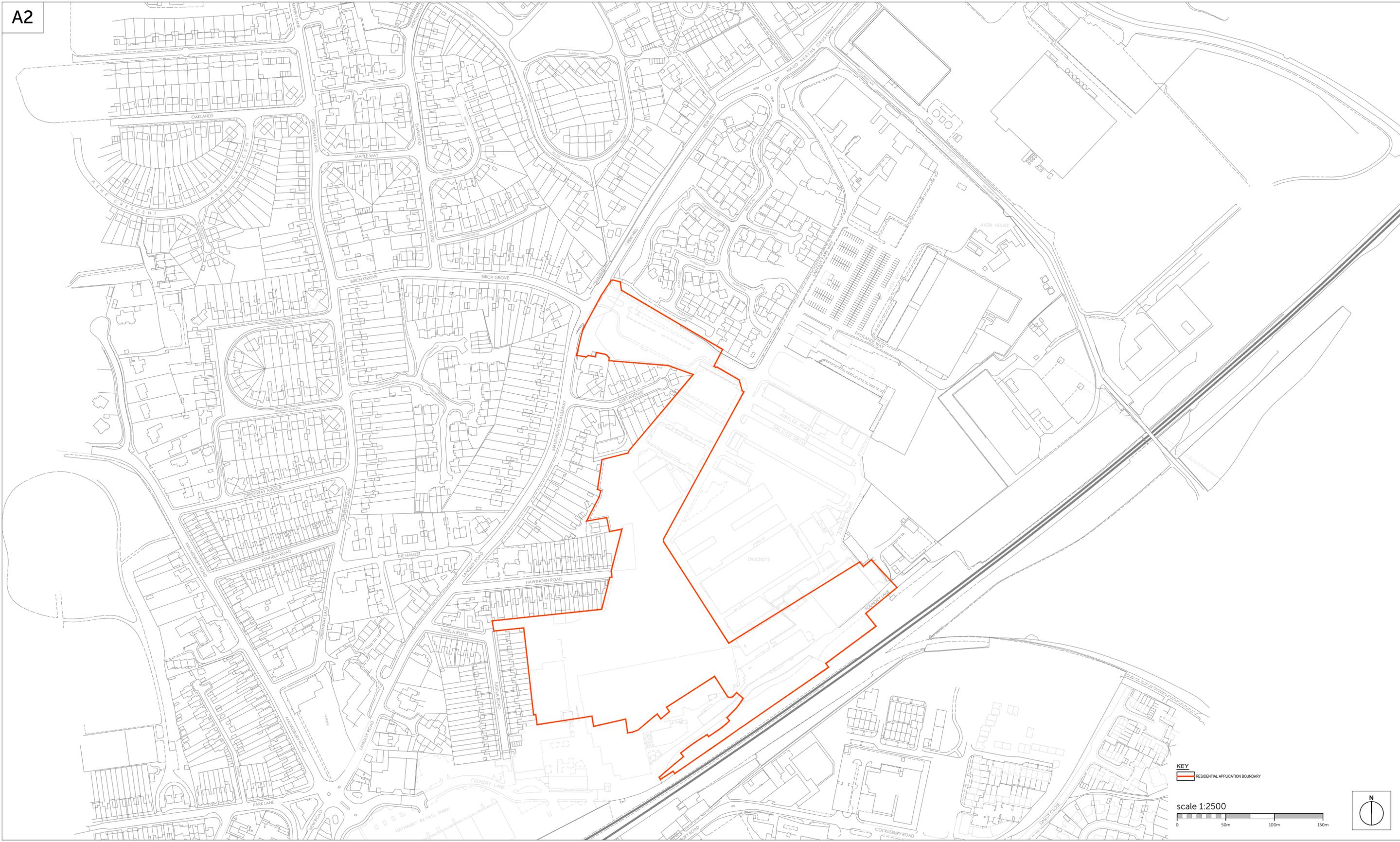
Place Shaping Priorities

The Local Plan will contain a set of place shaping priorities for each main settlement. These will form the basis for an overarching planning policy for Chippenham that will guide development and the direction of growth. The Council is seeking views on the draft priorities for Chippenham, which include the following:

- Improving the resilience of the town centre by – continuing to make improvements to Chippenham Railway Station and Cocklebury Road area to attract inward investment to this area; and
- Ensuring a network of well-connected footpaths and cycleways and connectivity for public transport across the town, to/from the town centre and through into the surrounding countryside, so that more people can choose active travel and public transport as a means of getting around.

Consultation Question CP2 - Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?

LPL supports the draft place shaping priorities for Chippenham since they are positive and a core element of them is aimed at improving the resilience of the town centre, which is essential for the continued sustainable development of the town. This priority is best achieved by focussing on the sustainable development of previously developed land within the urban area.



KEY
 RESIDENTIAL APPLICATION BOUNDARY

scale 1:2500
 0 50m 100m 150m



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| Rev | Description | Date | Au | Ch |
|-----|-------------|------|----|----|
| | | | | |

Project **LANGLEY PARK, Chippenham**
 Drawing **Location Plan**

| | | | |
|-------------|---------------------------|---------|---------------------|
| Client | Langley Properties | Date | 05.03.21 |
| Job no. | LANG191053 | Rev. | A |
| Dwg no. | LP.03 | Scale | 1:2500 at A2 |
| Author | VN | Checker | |
| Status | | Office | Romsey |
| Client ref. | | | |

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